



# ENEOS SAFETY MANAGEMENT SYSTEM

## Internal Manual

<b>Validity</b>		
<input checked="" type="checkbox"/> Permanent		<input type="checkbox"/> Temporary up to
Page 13	Validation	Approval
Fonction	Quality, Health, Safety and Environment Director	Chief Executive Officer
Name	Mary NTANTANG	Patrick ECKELERS
Date		
Signature		

March 2022 Edition  
EO MA QHSE QAC 008

### i) TABLE OF UPDATE OF THE DOCUMENT

Version	Effective Date	Nature of revision
1.0	25 January 2011	Creation
2.0	March 2022	Revision to align with ISO 45001:2018 and DFI Requirements including those of the AfDB Integrated Safeguards System (ISS).

**ii) CONTRIBUTIONS**

Name and first name	Responsibility	Contribution
Mary Ntantang	Quality, Health, Safety and Environment Director	Revision
Jacky Eoga	Quality Audit and Continuous Improvement	Compliance
Dulcy Tebu	Standards and Procedures Analyst	Compliance

## CONTENTS

1. BACKGROUND.....	4
2. SCOPE.....	5
3. NORMATIVE REFERENCES.....	5
4. TERMS AND DEFINITIONS .....	6
5. CONTEXT .....	8
6. LEADERSHIP.....	12
7. PLANNING .....	19
8. SUPPORT .....	22
9. OPERATION.....	24
10. PERFORMANCE EVALUATION .....	28
11. IMPROVEMENT.....	30
12. ANNEX 1.....	32



## 1. Introduction to ENEO

Energy of Cameroon S.A. (ENEO) is Cameroon's national electricity utility, operating under a 30-year concession running until 2031. ENEO owns and operates 1,000 MW of generating capacity, as well as the country's distribution networks while the transmission network was transferred to the transmission company, Société Nationale de Transport de l'Électricité (SONATREL) in 2018.

ENEO was privatized in 2001, when 56% of its shares were acquired by AES with the remaining 44% held by the Government of Cameroon. In 2014, AES sold its shares to Actis. In 2017 ENEO underwent a restructure, with the entry of employees into the shareholding structure. Today, 51% of its capital is held by Actis group, 44% by the State of Cameroon and 5% by its employees. ENEO employs around 3,700 people (of which 26% women) spread across five departments as follows: i) Corporate Development, ii) Generation, iii) Distribution & Commercial, iv) Operations, and v) Compliance.

ENEO's generating facilities consist of a total of 37 power stations, including 13 interconnected and 24 remote thermal power plants. ENEO's energy sources consist of 73.30% hydro, 26.60% thermal and 0.04% solar. ENEO is also the off-taker of IPPs, including Kribi (216 MW) and Dibamba (86MW), which were financed by the Bank. As per the latest concession amendment, ENEO is due to create in 2021 a subsidiary ("Eneo Genco") dedicated to generation. ENEO's distribution network consists of 11,450 kilometers of lines from 5.5 to 33 kilovolts, and 11,158 kilometers of lines from 220 to 380 volts. As of December 31, 2020, ENEO had more than 1,483,940 customers, of which approximately 45% were located in the cities of Douala and Yaoundé.

## 1. BACKGROUND to ENEO's OHSMS

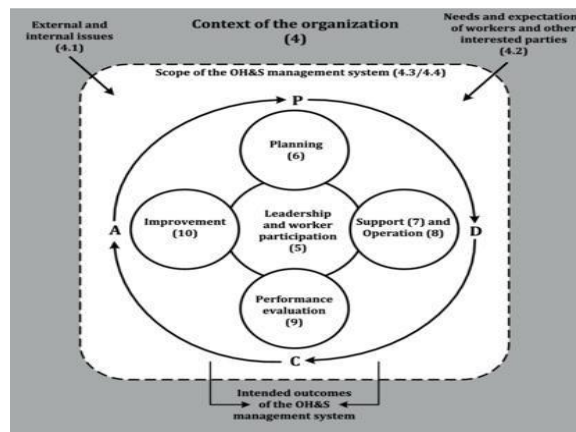
As a principle of our business activities, we consider it is our responsibility to ensure the Health and Safety of our employees, contractors and the public. This responsibility includes promoting and protecting their physical and mental health. This Occupational Health & safety (OH&S) Manual is written in sufficient detail to enable Eneo provide safe and healthy workplaces, prevent work-related injury and ill health, protect the general public and continually improve OHS performance.

The Eneo Occupational Health & Safety Management System (OHSMS) was established in 2011, in compliance with the requirements of OHSAS 18001 :1999 Occupational Health and Safety Management System and OHSAS 18002 :2000 Guidelines for the Implementation of OHSAS 18001.

Recently, Eneo decided to migrate to ISO 45001 :2018. Therefore, the current OHSMS of Eneo considers elements within the framework of the National Regulations, IFC Standards ISO 45001 :2018 and the African Development Bank's Integrated Safeguards System (ISS) and relevant Good International Industry Practice (GIIP) guidelines.

The System described in this manual is designed as basis for the continuous improvement of activities and compliance with the requirements for the protection of persons, assets and Safety Policy set by the company.

This system must be respected and maintained by all Eneo and Contractor personnel, given that their actions directly or indirectly affect the OHSMS.



The Eneo OH&S Manual is based on the Plan-Do-Check-Act model.

Note : The numbers given in brackets refer to the clause numbers in this document

## 1.0 PRODUCTS & SERVICES

Eneo's product is safe, affordable and reliable electrical energy. Eneo provides quality service while maintaining and operating its generation and distribution facilities.

## 2. SCOPE

This Occupational Health & Safety Management System Manual contains the Safety requirements that apply to each of the activities performed by Eneo and its Contractor and sub-contractors Companies including to all employees and visitors either working for and on behalf of ENEO as well as its assets and public.

## 3. NORMATIVE REFERENCES

The Manual is built around the following requirements:

- ISO 45001 :2018
- ACTIS ESG Code
- Eneo OH & SP Rev. 22 09/20
- National Legislation
- International Finance Corporation (IFC) Performance Standards (PS)
- International Legislation

African Development Bank's Integrated Safeguards System (ISS)



**Table A. IFC Standards and AfDB ISS Operational Safeguards benchmarked against each other**

IFC performance standards	AfDB ISS Operational Safeguards
Performance Standard 1 (PS 1): Assessment and Management of Environmental and Social Risks and Impacts	Operational Safeguards 1 (OS1): Environmental and Social Assessment
Performance Standard 2 (PS 2): Labour and Working Conditions	Operational Safeguards 5 (OS5): Labour Conditions, Health and Safety
Performance Standard 3 (PS 3): Resource Efficiency and Pollution Prevention	<u>Operational Safeguards 4 (OS4): Pollution Prevention and Control, Greenhouse Gases, Hazardous Materials and Resource Efficiency</u>
Performance Standard 4 (PS 4): Community Health, Safety and Security	Operational Safeguards 1 (OS1): Environmental and Social Assessment
Performance Standard 5 (PS 5): Land Acquisition and Involuntary Resettlement	Operational Safeguards 2(OS2): Involuntary Resettlement: Land Acquisition, Population Displacement and Compensation
Performance Standard 6 (PS 6): Biodiversity Conservation and Sustainable Management of living Natural Resources	Operational Safeguards 3 (OS3): Biodiversity and Ecosystem Services
Performance Standard 7 (PS 7): Indigenous Peoples	Operational Safeguards 1 (OS1): Environmental and Social Assessment <sup>1</sup>
Performance Standard 8 (PS 8): Cultural Heritage	Operational Safeguards 1 (OS1): Environmental and Social Assessment

In cases where the national legislation, IFC performance standards and AfDB ISS requirements, guidelines and documents do not address some specific environmental and/or social aspect, other applicable international standards will be considered (e.g. those of the World Health Organization (WHO), International Labour Organization (ILO)).

## TERMS AND DEFINITIONS

### 4.1 Abbreviation:

N°	Acronym	Description
1	MD	Managing Director
2	MR	Management Representative
3	DQHSE	Directorate of Quality, Safety and Environment
4	OH&SP	Occupational Health and Safety Policy
5	OHS	Occupational Health & Safety
6	OHSMS	Occupational Health and Safety Management System
7	QER	Quick vent Report
8	LOTO	Lock Out Tag Out

## 4.2 Definition

1. **Safety:** A condition of being free from unacceptable risk of harm.
2. **Worker:** person performing work or work-related activities that are under the control of Eneo:
  - Persons perform work or work-related activities under various arrangements, paid or unpaid, such as regularly or temporarily, intermittently or seasonally, casually or on a part-time basis.
  - Workers include top management, managerial and no managerial persons.
  - The work or work-related activities performed under the control of the organization may be performed by workers employed by the organization, workers of external providers, contractors, individuals, agency workers and by other persons to the extent the organization shares control over their work or work related activities, according to the context of the organization.
3. **Contractor:** external organization providing services to Eneo in accordance with agreed specifications, terms and conditions o Services may include construction activities, among others.
4. **Workplace:** place under the control of the organization where a person needs to be or to go for work purposes
  - The organization's responsibilities under the OH&S management system for the workplace depend on the degree of control over the workplace.
5. **Consultation:** seeking views before making a decision o Consultation includes engaging health and safety committees and workers' representatives, where they exist.
6. **Participation:** Involvement in decision-making o Participation includes engaging health and safety committees and workers' representatives, where they exist.
7. **Acceptable risk:** risk that has been reduced to a level that can be tolerated by Eneo having regard to legal obligations and the company's Health and Safety Policy.
8. **Audit:** Systematic, independent and documented process for obtaining 'audit evidence' and evaluating it objectively to determine the extent to which 'audit criteria' are fulfilled.
9. **Continual improvement:** year on year improvements in both Eneo's health and safety performance and the Health and Safety System.
10. **Corrective action:** action to eliminate the cause of a nonconformity or other undesirable situation.
11. **Document:** hard copy or electronic information in written, diagrammatic or pictorial form.
12. **Dangerous Situation:** A condition or behavior with potential to cause harm (Dangerous Situation is either an Unsafe Act or an Unsafe Condition)
13. **Hazard:** source, situation or act with a potential for harm in terms of injury or ill health.
14. **Hazard identification:** the process of recognizing that a hazard exists and defining its characteristics.
15. **Ill health:** identifiable, adverse physical or mental condition arising from and/or made worse by a work activity and/or work-related situation.
16. **Relevant Interested Parties:** Individuals or groups concerned with or affected by the safety performance of the company.
17. **Incident:** work-related event in which an injury or ill health or fatality occurred or could have occurred.
  - An accident is an incident which has given rise to injury, ill health, or fatality. o An incident where no injury, ill health or fatality occurred is referred to as a near miss. o Dangerous occurrence is a particular type of near miss.



- An emergency situation is a particular type of incident.
- 18. **Near Misses:** An unintended, unplanned and unexpected event that could have but did not result in personal injury. A near-miss may also be an action or condition that left unaddressed could result in a personal injury or property damage. A near-miss is an opportunity to improve environmental, health, and safety practices.
- 19. **Interested party:** person or group outside the workplace concerned with or affected by the OH&S performance of the company.
- 20. **Non-conformity:** non-fulfillment of a requirement.
- 21. **Occupational health and safety (OH&S):** conditions and factors that affect, or could affect, the health and safety of employees or other workers (including temporary workers and contractor personnel), visitors or any other person in the workplace.
- 22. **OH&S management system:** part of an organization's management system used to develop and implement its OH&S policy and manage its OH&S risks.
- 23. **OH&S objective:** OH&S goal, in terms of OH&S performance set annually by Eneo in order to achieve one of its Health and Safety Policy commitments.
- 24. **OH&S performance:** measurable results of Eneo's management of its OH&S risks.
- 25. **OH&S policy:** overall intentions and direction of the company related to OH&S performance as expressed by the Managing Director.
- 26. **Risk:** The combination of the probability and consequence of a specified hazardous event occurring. (Risk = Probability x Consequence).
- 27. **Risk Assessment:** Overall process of estimating the magnitude of a risk and decide whether this is tolerable or not.

## 4. CONTEXT

### 5.1. Understanding Eneo and Its Context

The internal & external issues that are relevant and can affect Eneo's ability to achieve intended results of the OHSMS are identified and documented by the respective departments with proposed actions. Information about these external and internal issues are regularly monitored and reviewed.

**Moral** – Eneo believes in the Principle of 'All workers have a right to work in places where risks to their health and safety are properly controlled. Health and safety are about stopping workers getting hurt at work or ill through work.'

To materialize this principle, Eneo has four Safety Beliefs as follows:

- All accidents, injuries or illness - caused by work activities can be prevented,
- All works must be carried out safely, no matter how important or urgent they are,
- It is a condition of employment to follow and comply with safety procedures,
- All employees and contractors have the right and obligation to stop work as soon as they identify a situation they believe to be unsafe

**Legal** – There is a wealth of health and safety legislation and codes of practice covering work both within offices and industrial sites. Without a formal system in place it will be difficult for Eneo to ensure comprehension and compliance with all their legal obligations.

**Financial** – In many cases there is often no conflict between what is good for business and what is good for health and safety management. Improved health and safety performance leads to increased productivity, reduced insurance premiums, improved morale and increases the Eneo's chances of growth and excellence.

The Eneo determines the external and internal issues that are relevant to its purpose and strategic direction and that affect its ability to achieve the intended results of the OSHMS. Consideration is given to the:

1. Positive and negative factors or conditions.
2. External context and issues, such as legal, regulatory, technological, competitive, cultural, social, political and economic environments.
3. Internal context and issues, such as values, culture, organization structure, knowledge and performance of the business.
4. Determination and requirements of the needs and expectations of interested parties relevant to the OSHMS.
5. Authority and ability to exercise control and influence.
6. Activities, products and services relevant to the business.
7. Documented information is retained as evidence to support that the context of Eneo has been taken into account in the OSHMS.



## 5.2. Understanding the Needs and Expectations of Interested Parties

The interested parties for Eneo include Clients, Contractors/Service Providers, Employees, Higher Management, Government / Regulatory Bodies. The needs and expectations of interested parties are identified and taken care by the departments. Management of Eneo is always committed to fulfill the needs and expectations of all interested parties. All workers have an expectation that neither their health nor their safety will be at risk as a result of their employment with Eneo. The main needs and expectations of the interested parties are given below:

No.	Relevant Interested Parties	Needs and expectations of the Interested Parties
1	Clients/OHSMSs	<ul style="list-style-type: none"> <li>• Access to electricity</li> <li>• Steady supply of good quality electricity</li> <li>• Good customer experience</li> <li>• A simple solution that manages compliance easier.</li> <li>• Generation and distribution and sale of electricity in-line with OHSMS and Regulatory requirements</li> <li>• Receive responsive support</li> <li>• Delivery of free content to educate around compliance</li> </ul>
2	Suppliers / Contractors	<ul style="list-style-type: none"> <li>• Good relationship.</li> <li>• On-going and secure workplace.</li> <li>• To be paid on time.</li> <li>• Clear understanding of requirements.</li> <li>• Constructive feedback.</li> <li>• Want to provide services/products to a reliable, reputable and financially viable business</li> </ul>
3	Eneo Employees	<ul style="list-style-type: none"> <li>• Job security.</li> <li>• Salary for work performed.</li> <li>• Flexible work hours.</li> <li>• Clear understanding of their role and responsibilities.</li> <li>• Able to raise issues of concern and provide constructive feedback.</li> <li>• Good, friendly and safe work environment.</li> <li>• To feel valued and appreciated.</li> <li>• Opportunities for personal development.</li> </ul>
4	Eneo Top Management/ Investor/ Shareholders	<ul style="list-style-type: none"> <li>• Have a growing business that provides profit.</li> <li>• Be well governed and well managed.</li> <li>• Want staff to enjoy their work, be challenged, perform their job competently and meet the company, regulatory and OHSMS Requirement</li> </ul>
5	Government & Regulatory Bodies	<ul style="list-style-type: none"> <li>• Follow the rules &amp; regulations laid down by the Government and Public authorities and meeting the Legal requirements.</li> <li>• To submit all tax obligations accurately and on time.</li> <li>• To maintain high standards of corporate governance.</li> </ul>
6	Visitors	<ul style="list-style-type: none"> <li>• Environment friendly workshop design with no emissions. Good, friendly and safe work environment.</li> </ul>
7	Community i.e. society at large	<ul style="list-style-type: none"> <li>• Good corporate citizen.</li> <li>• Diversity of employees</li> </ul>
8	Lenders	<ul style="list-style-type: none"> <li>• Compliance with their standards</li> <li>• Have a growing business that provides profit.</li> </ul>



### 5.3. Occupational Health and Safety Management System and its Processes

Eneo's Health & Safety System has been based on the format of the new International Standard ISO 45001:2018. Processes for Eneo with inputs, outputs and sequences are given in **Annex - II**. Processes include:

#### Generation Management:

- Production system operation
- Construction and rehabilitation of power plants and dams
- Operation of power plants and dams
- Maintenance of power stations and dams

#### Network Management :

- Electrical Systems Operation
- Construction of Substations and Lines
- Network operation
- Maintenance of Substations and Lines

#### Business Management

- Loss Reduction
- Subscription
- Meter Reading
- Billing
- Cash Collection
- Reconciliation
- Termination

Necessary resources for the processes are provided by the management through HR and their responsibilities & authorities are defined and documented. Risks and opportunities for each process are determined and necessary actions are planned to enhance desirable effects and eliminate/reduce undesired effects. The OSHMS consists of the following levels of documented information:

1. Policy: The Eneo Safety Policy demonstrate the overall commitment to improving quality performance and is authorized by the Managing Director.
2. Our 10 Life Saving Rules: These are clear and simple rules based on our experience
3. System procedures: high-level procedures that define the activities that are to be fulfilled to ensure that the OSHMS complies with standards.
4. Module workflows, operational procedures and work instructions. Control and operational procedures:
  - Meet OHSMS requirements.
  - Provide supplementary guidance and instructions to support the intent of the OSHMS.
  - Ensure that the requirements of the OSHMS will be adequately addressed within the organization.
5. Forms, and records are evidence to prove the OSHMS is operational.



## 5. LEADERSHIP & Commitment

### 6.1. Leadership & Commitment : General

Eneo Top Management demonstrates its leadership & commitment with respect to Occupational Health and Safety Management System (OHSMS), through:

- Assigning responsibility and accountability for effectiveness of the OHSMS.  
Roles and responsibilities are defined, documented and communicated to all staff involved in the Safety Management System and their relationships/interactions in order to facilitate an effective OHSMS.
  - A Directorate in charge of Quality, Health & Safety and Environment has been created in Eneo with the responsibility and authority to:
  - Ensure that the Safety Management System requirements are established and implemented and are maintained according to ISO 45001, National legislation and Lenders' Requirements
  - Report the Performance of the Safety Management System to the Managing Director to review and take it as a basis for improvement.
- Taking overall responsibility for the prevention of work-related injury and ill health and provision of safe and healthy workplaces and activities.  
Workers risk profiles are defined and measures are taken to ensure their safety.
- Protecting workers from reprisals when reporting incidents, hazards, risks and opportunities. A system is put in place to ensure free reporting and workers are encouraged to report less severe accidents from where lessons learnt can be shared in order to avoid accidents
- Ensuring Eneo establishes and implements a process for consultation and participation of workers.  
Engaging with social partners is at the center of our communication at all levels of the company. A participatory approach is used for decision making related to changes in equipment and materials to integrate workers' opinion.
- Supporting the establishment and functioning of Health and Safety Committees.  
Safety committees are established throughout the national territory with staff representatives as members
- Ensuring that Health and Safety Policy & Health and Safety Objectives are established and are compatible with strategic direction of Eneo.  
Health and Safety objectives and key Performance indicators are defined for all functions aligned with company strategy
- Ensuring that resources needed for the OSHMS are available.  
Adequate resources and staff are provided to implement the OHSMS. The Directorate in Charge of Safety has been provided essential resources for the implementation of the OHSMS with specialized skills, technology and financial resources.
- Communicating on importance of effective OSHMS to all concerned. Guiding and supporting personnel to contribute to the effectiveness of OSHMS.
- Promoting Risk Based and Process approach.
- Promoting improvements



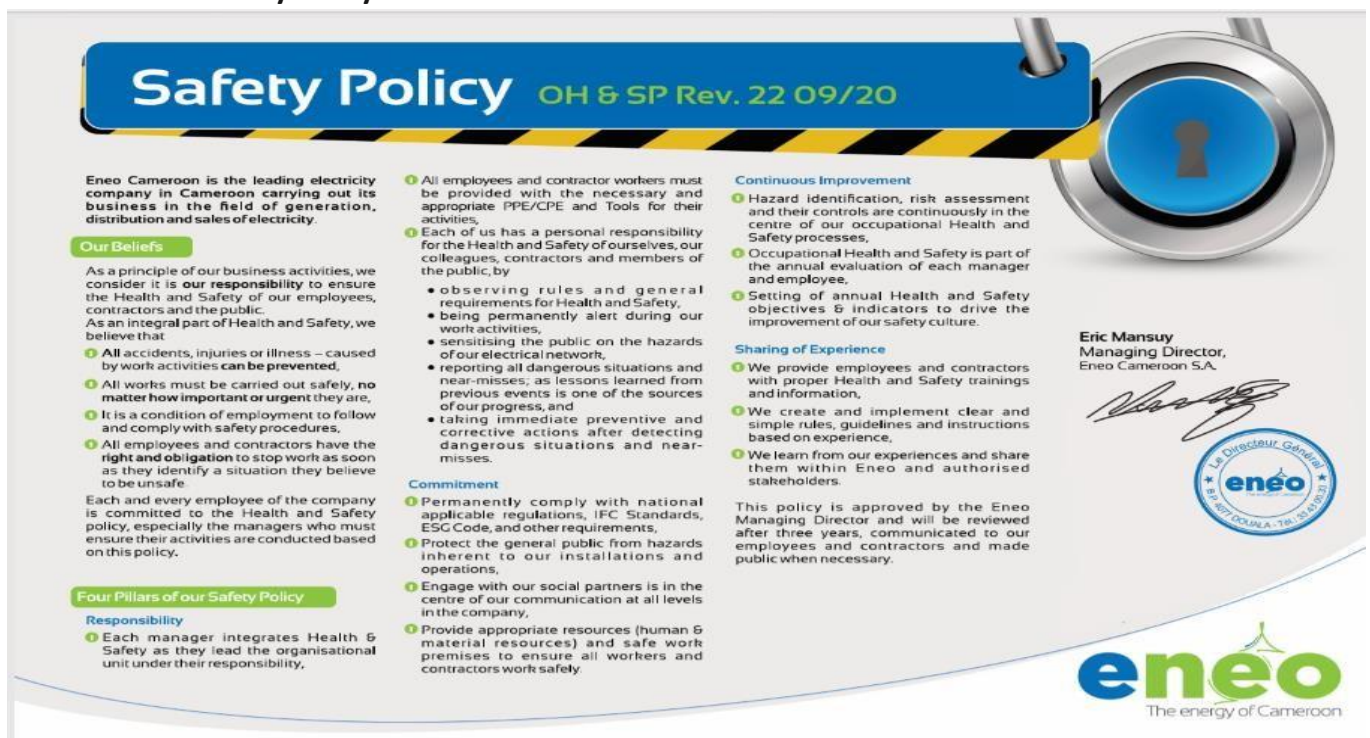
- Ensuring that OHSMS achieves its intended results by periodic review.
- Monthly, Quarterly and Annual reviews of the OHSMS are carried out with corrective actions to ensure continuous improvement.

## 6.2. Health and Safety Policy

The top management of Eneo has established, implemented and maintained a Health and Safety Policy, which is appropriate to the purpose and context of the organization. It provides commitment to satisfy applicable requirements and continual improvements of the Occupational Health and Safety Management System. The Health and Safety policy is communicated, displayed, understood and applied within the organization and made available to the relevant interested parties when necessary.

The policy, which has been approved by the Managing Director, is reproduced below

### Eneo Health & Safety Policy



**Safety Policy** OH & SP Rev. 22 09/20

Eneo Cameroon is the leading electricity company in Cameroon carrying out its business in the field of generation, distribution and sales of electricity.

**Our Beliefs**

As a principle of our business activities, we consider it is our **responsibility** to ensure the Health and Safety of our employees, contractors and the public. As an integral part of Health and Safety, we believe that

- 1 All accidents, injuries or illness – caused by work activities **can be prevented**,
- 1 All works must be carried out safely, no matter how important or urgent they are,
- 1 It is a condition of employment to follow and comply with safety procedures,
- 1 All employees and contractors have the **right and obligation** to stop work as soon as they identify a situation they believe to be unsafe

Each and every employee of the company is committed to the Health and Safety policy, especially the managers who must ensure their activities are conducted based on this policy.

**Four Pillars of our Safety Policy**

**Responsibility**

- 1 Each manager integrates Health & Safety as they lead the organisational unit under their responsibility,

**Commitment**

- 1 All employees and contractor workers must be provided with the necessary and appropriate PPE/CPE and Tools for their activities,
- 1 Each of us has a personal responsibility for the Health and Safety of ourselves, our colleagues, contractors and members of the public, by
  - observing rules and general requirements for Health and Safety,
  - being permanently alert during our work activities,
  - sensitising the public on the hazards of our electrical network,
  - reporting all dangerous situations and near-misses, as lessons learned from previous events is one of the sources of our progress, and
  - taking immediate preventive and corrective actions after detecting dangerous situations and near-misses.

**Continuous Improvement**

- 1 Hazard identification, risk assessment and their controls are continuously in the centre of our occupational Health and Safety processes,
- 1 Occupational Health and Safety is part of the annual evaluation of each manager and employee,
- 1 Setting of annual Health and Safety objectives & indicators to drive the improvement of our safety culture.

**Sharing of Experience**

- 1 We provide employees and contractors with proper Health and Safety trainings and information,
- 1 We create and implement clear and simple rules, guidelines and instructions based on experience,
- 1 We learn from our experiences and share them within Eneo and authorised stakeholders.

This policy is approved by the Eneo Managing Director and will be reviewed after three years, communicated to our employees and contractors and made public when necessary.

Eric Mansuy  
Managing Director,  
Eneo Cameroon S.A.

*[Signature]*

**eneo**  
The energy of Cameroon

## 6.3. Health and Safety Policy

Responsibilities and authorities are defined in Job Descriptions. These are communicated to the relevant functions. Organization Chart for Eneo showing the authority and hierarchy of various roles is given in **Annex – I**.

### Management Representative

The Director of Quality, Health & Safety and Environment is the currently appointed Management Representative and has responsibility and authority for ensuring that the:



- OHSMS is established, implemented and maintained in accordance with the requirements of ISO 45001:2018 and the AfDB ISS requirements
- OHSMS processes are delivering their intended outputs.
- Reporting performance of the OSHMS and opportunity for improvements to the management.
- Integrity of the OHSMS is maintained when changes to the OHSMS are planned and implemented.
- Reporting on the performance of the OHSMS to top management for review and as a basis for improvement.

#### 6.4. Consultation and Participation of Workers

Eneo has put in place a process for consultation and participation of workers. This is carried out through the Health & Safety Committees put in place across the organization as one of our four pillars described in the Safety Policy. This committee takes place once a quarter and is attended by staff delegates and external parties. The following events may be used as well:

##### 6.4.1. The Corporate Health and Safety Steering Committee

- The Meeting is chaired by the Managing Director and holds on a monthly basis
- Health and Safety Meeting committee is made up of Regional Directors and Directors with Support Functions from all levels within the organization.
- The safety policy and 10 Life Saving Rules were established with input from workers through this Committee
- The meetings are minuted with action points clearly identifying responsibility with target date for completion. The following items will be discussed:
  - Safety Moment
  - Previous minutes and actions taken
  - Reviews of performance and trend analysis
  - Focus Topics (new laws and legislative requirements, accidents, new category of hazards and Risks etc.)

##### 6.4.2. Regional Health and Safety Steering Committee

- The Meeting is chaired by the Regional Director
- This committee is made of regional leadership, technical managers and staff representatives
- The non-managerial staff are represented in these committees by the staff representatives
- The Meeting holds once a month
- All employees and contractors invited as resource persons MUST attend unless excused by hierarchy for an extraordinary reason.
- The QHSE Regional Coordinator will prepare the minutes of the meeting:

- o Names of all attendees
- o Concerns or hazards raised/status of closure of corrective actions
- o Accident investigation
- o A brief summary of specific topics covered or instructions given
- o Changes that affect workplace safety
- o General business Excellence

Completed meeting records are shared at regional and head office levels.

Members of the committee are trained and they follow up on closure of corrective actions

### **Public safety sensitization programme and Consultation**

Eneo extends their awareness raising program to the population. As part of this program, all Eneo and Contractor workers undertake face-to-face safety talks on electrical hazards in schools and communities. Safety messages are also broadcast by community radio stations in local dialects under the supervision of Eneo. This programme is driven by specific safety KPIs and goals set at the beginning of each year and monitored throughout the year. Gadgets like posters, exercise books, flipcharts, rulers, flyers and pens are printed with safety messages.

Safety messages are also shared with the public at large on SMS, Facebook, twitter and WhatsApp fora.

Eneo evaluates the public sensitization programme once every three years to get the views of the members of the public which are integrated in an action plan to ensure the effectiveness of the programme.

As part of the environmental and social impact assessment, Eneo organizes public consultations to inform the population within the project area and get their views as well.

### **ROLES & RESPONSIBILITIES**

This Safety Management System is a detailed description of the means to help achieve its goals (behavior detailed requirements regarding safety) applicable to all areas of activity of the Company arising from the Safety Objectives that are necessary to establish and achieve them.

They are defined, documented and communicated to all staff involved in the Safety System (who controls, perform and verify issues and tasks that affect the safety of workers and the public), their roles, responsibilities and relationships in order to facilitate an effective management, particularly in cases where it needs freedom and authority.

The following section describes the roles and responsibilities within the safety management system:

#### Managing Director

- Ensure the allocation of human, technical and financial resources to effectively implement and maintain the OHSMS.
- Approve, adopt, sign and date the OH&S Policy
- Manage external communications

#### Chief Operational Officer



- Approve and adopt the OHSMS Manual
- Actively communicate to personal the business expectations for good safety performance.
- Measure and track progress against safety goals and objectives.

Directors, Regional Directors and Sub Directors:

- Actively communicate to personal the business expectations for strong safety performance.
- Ensure that safety operational control procedures are implemented.
- Designate the person or group suitable to close the non-conformities, monitor performance and propose necessary changes to procedures and documents.
- Measure and track progress against safety goals and objectives.

QHSE Director:

- Review and approve the OHSMS.
- Monitor the implementation of the OHSMS.
- Ensure the compliance of the findings from Internal Audits.
- Propose the safety indicators and goals in accordance with the Policy

Sub Director QHSE Filed Operations

- Develop the OHSMS
- Ensure the implementation of the OHSMS within the Company.
- Follow up the implementation of the Internal Audits Findings.
- Develop and update the safety Indicators and Goals
- Identify, track and communicate the issues and implications of new or modified regulations.
- Manage the interface with the regulatory agency.
- Support the efforts of safety communications.
- Consolidate the performance and report of the safety management program.
- Ensure that changes resulting from the management review are incorporated into the OHSMS.
- Develop training materials.
- Coordinate trainings for all Eneo and Contractor workers.

Regional/Unit QHSE Coordinators:

- Implement the OHSMS in the Region/Units.
- Communicate the issues and implications of new or modified regulations in the Region.

- Manage the interface with the regional regulatory agency.
- Support the Regional Directors in the implementation of the OHSMS
- Tracking the Safety Performance and report progress
- Deploy Safety Trainings to all Eneo and Contractor workers.
- Conduct and Safety Internal Audits and Register the Findings Identified.
- Conduct site inspections to verify the compliance of the OHSMS

#### Supervisors

- Implement the OHSMS within the teams.
- Ensuring that all personnel has the necessary tools to control and mitigate risk
- Ensure that all personnel participate in safety training
- Ensure improvements to implement safety control in all the field activities performed by the personnel.
- Ensure the reporting of any safety incident using the Quick Event Report Form.
- Ensure the implementation of any recommendations resulting from the safety inspections findings carried at worksite, equipment and facilities.
- Guarantee the PPE/CPE/Tools management in accordance with the procedure

#### All operational Personnel:

- Undertake risk assessment and address the issues / findings.
- Implement Control of Safety Records and Documents in their Units.
- Report all incidents and / or near miss occurring during work activities.
- Monitor and report any potential hazards identified on the field to your immediate superior.
- Actively participate in all training on safety procedures.
- Integrate safety in daily activities.

The document SGD 4.4.1 describes the involvement of each position in the OHSMS.



# **ENEO OPERATING SITES AND FACILITIES (as of April 2022)**

Area	Facility/Equipment	Quantity	Observation
<b>Generation (984MW installed Capacity)</b>	Hydro	03	
	Mini Hydro	1	200kw in Mape
	Grid Connected Thermal	11	3 HFO, Mamfe (5MW) in progress
	Hybrid Solar Thermal	02	
	Remote Thermal	25	Nguti (3MW) in progress)
<b>Distribution</b>	Substation	24	
	MV Lines	22608 km	11 450 km lines of 5.5 to 33 KV 11 158 km lines of 220 to 380 KV
	LV Lines	15081 km	
	Operational Regions	09	
	Localities	250	
	Operating Units (Technical Bases/Centres)	75	
	Customers	1700000	About 50% in Douala & Yaoundé
<b>Commercial</b>	Agency	176	
<b>Head Count</b>	Eneo	3700	
	Contractors	4000	
<b>Support Services</b>	Warehouses	31	
	Workshops	02	
	Vehicles	1727	
	Pole Treatment Unit	01	



## 6. PLANNING

### 7.1. Addressing Risks and opportunities

#### 7.1.1. General

Eneo has put in place a process to identify and manage risks. The following have been considered in the development of the Health & Safety System:

1. Hazards.
2. OH&S risks and other risks.
3. OH&S opportunities and other opportunities.
4. Legal and other requirements

All Department heads have identified risks for individual processes and controls are developed for all the identified risks. The risks and the issues are addressed with a view to:

- enhance desirable effects
- reduce or prevent undesired effects
- achieve improvements

The control actions are implemented considering potential impact on the conformity of products and services. Actions taken to address the risks and issues are regularly monitored by the Department Heads for strict implementation. The risks, issues and the controls thereof are maintained as Documented Information by the department heads. Opportunities for achieving desired improvements are identified by the Department heads and implemented to the extent possible. The results of such implementations are reviewed and achieved improvements are assessed on a quarterly/monthly basis.

#### 7.1.2. Hazard identification and assessment of risks and opportunities

##### 7.1.2.3. Hazard Identification

Eneo has established, implemented and maintained a process of Job Safety Analysis for proactive identification of hazards arising and mitigation measures. The process has taken into account but not limited to:

1. Routine and non-routine activities and situations, including consideration of infrastructure, equipment, materials, substances and the physical conditions of the workplace;
2. Hazards that arise as a result of product design including studies, development, testing, production, assembly, construction, service delivery, maintenance or disposal;
3. Human factors;
4. How the work is actually done; Emergency situations;
5. People, including consideration of those with access to the workplace and their activities, including workers, contractors, visitors and other persons;
6. Those in the vicinity of the workplace that can be affected by the activities of the organization;
7. Workers at a location not under the direct control of the organization;



8. The design of work areas, processes, installations, machinery/equipment, operating procedures and work organization, including their adaptation to human capabilities;
9. Situations occurring in the vicinity of the workplace caused by work-related activities under the control of the organization;
10. Situations not controlled by the organization and occurring in the vicinity of the workplace that can cause work-related injury and ill health to persons in the workplace;
11. Actual or proposed changes in the organization, its operations, processes, activities and Occupational Health and Safety Management System;
12. Changes in knowledge of, and information about, hazards;
13. Past incidents, internal or external to the organization, including emergencies, and their causes;
14. How work is organized and social factors, including workload, work hours, leadership and the culture in the company.

The process can be found in Procedure **SGP 4.4.6/24**

#### **7.1.2.2. Assessment of OH&S Risks and Other Risks to the OH&S Management System**

Eneo has established, implemented and maintained processes to:

1. Assess OH&S risks from the identified hazards taking into account applicable legal requirements and other requirements and the effectiveness of existing controls;
2. Identify and assess the risks related to the establishment, implementation, operation and maintenance of the OH&S management system that can occur from the issues identified in the organization context and the needs and expectations of the interest parties.

The organization's methodology and criteria for assessment of OH&S risks is defined with respect to scope, nature and timing, to ensure it is proactive rather than reactive and used in a systematic way. These methodologies and criteria are maintained and retained as documented information.

#### **7.1.2.3. Identification of OH&S Opportunities and Other Opportunities**

Eneo has established, implemented and maintained processes to identify:

1. Opportunities to enhance OH&S performance taking into account planned changes to the organization and its processes or its activities;
2. Opportunities to eliminate or reduce OH&S risks;
3. Opportunities to adapt work, work organization and work environment to workers;
4. Opportunities for improving the OH&S management system.

### 7.1.3 Determination of Legal and other Requirements

Eneo has :

1. Determined and access to the up to date legal requirements to which the organization subscribes / compliance obligations related to its Hazards and OH&S risk;
2. Determined how these legal and other requirements / compliance obligations apply to the organization and what needs to be communicated;
3. Take these legal and other requirements / compliance obligations into account when establishing, implementing, maintaining and continually improving its OH&S management system.

The organization has maintained documented information of its applicable legal and other requirements / compliance obligations and has ensure that it is updated to reflect any changes.

### 7.1.4 Planning Action

Eneo has planned to take actions to address its:

1. Significant environmental aspects, and address these risks and opportunities;
2. Compliance obligations / applicable legal and other requirements;
3. Risks and opportunistes;
4. Integrate and implement the actions into its OHSMS processes or other business processes;
5. Evaluate the effectiveness of these actions;

The organization has taken into account the hierarchy of controls and outputs from the Occupational Health and Safety Management System when planning to take action. The organization has considered its best practices, technological options and its financial, operational and business requirements.

## 7.2. Occupational Health and Safety Objectives and planning to achieve them

Occupational Health and Safety objectives for all processes are defined and are available with the respective department heads. These are consistent with the Occupational Health and Safety policy and measurable. Occupational Health and Safety Objectives are defined with focus to maintain and improve the OHS and to achieve continual improvement. Objectives are monitored and communicated. Documented information of Occupational Health and Safety Objectives are maintained. Planning for achievements of the Objectives is done covering the action plan, resources responsibility and time period. Management Representative in consultation with the Department heads determines fulfilment of the Occupational Health and Safety objectives periodically and puts forward the results of achievements for Management Review. While planning how to achieve its Occupational Health and Safety objectives, Eneo has considered;

1. What will be done;
2. What resources will be required;
3. Who will be responsible;
4. When it will be completed;



5. How the results will be evaluated;
6. How it will be measured through indicator (if practicable) and monitored, including frequency;
7. How the actions to achieve Occupational Health and Safety objectives will be integrated into the organization's business processes.

The organization has maintained and retains documented information on Occupational Health and Safety objectives and planning to achieve them.

- Operational procedures and work instructions including:
  - Work at Height and Rescue Procedure
  - Generation LOTO Procedure
  - Distribution LOTO Procedure
  - Accident / Incident Management Procedure
  - Traffic Control in Work Zones
  - PPE/CPE/Tools Management Procedure
  - Confined space entry procedure
  - Electrical Licence Procedure
  - Risk Assessment procedure
  - Hot Works Procedure
  - Defensive Driving and Vehicle Safety Procedure
  - Job Safety Analysis and Pre-Job Briefing Procedure
  - Contractor Management Procedure
  - Communication of monthly safety performance procedure
  - Recognition program
  - Safety Meetings Procedure
  - Safety Walk, work site visit, inspection procedure
  - Document Control Procedure
  - Our 10 Life Saving Rules
  - Safety Instruction Booklet for technical commercial activities
  - Public safety sensitization programme
  - etc.

## 7. SUPPORT

### 8.1. Resources

The organization has determined and provides the resources needed for the establishment, implementation, maintenance and continual improvement of the Occupational Health and Safety Management System. Resources needed, which include people, infrastructure, environment, monitoring & measuring resources are determined by the respective Department heads and approved by the Managing Director. For determining the resources, capabilities and constraints of internal resources and required competency are considered. Requirement of



personnel and the infrastructure are identified by departmental heads for effective operation and control of OHSMS and are approved by the Managing Director. Personnel could be internal or through external providers. Infrastructure includes:

- Systems used for planning & recording (such as ERP in progress) including hardware and software
- Processing and testing equipment at power plants and workshop
- Information and communication technology

## 8.2. Competence

Any person with a role concerning the OHSMS shall have the necessary underpinning knowledge and skills to be competent to assess and manage the respective OHS risks and to define and implement the associated control measures.

Management ensures that the personnel performing work which affects the performance and effectiveness of the OHSMS management system and its ability to fulfill its compliance obligation are competent on the basis of education, training, skills and experience. Where necessary, initial training or refresher is provided to personnel to acquire necessary competence and the effectiveness is evaluated. Documented information is maintained as evidence of competence.

## 8.3. Awareness

Personnel of each department are made aware of Health and Safety policy, and objectives for the department and their contribution to effective Occupational Health and Safety Management System. They are also made aware of:

1. Related actual or potential OH&S hazards and risk that are relevant for them.
2. The implications of not conforming to the Occupational Health and Safety management system requirements, including not fulfilling the organization's compliance obligations, also includes the consequences, actual or potential, of their work activities.
3. Information and outcome of the investigation of relevant incidents.

## 8.4. Communication

8.4.1 Mode of internal and external communications is informed to the personnel by the Communication Department. It includes what to communicate, whom to communicate and when.

8.4.2 Eneo communicates internally information relevant to the Occupational Health and Safety management system among the various levels and functions of the organization, including changes to the Occupational Health and Safety management system, as appropriate. Eneo ensure its communication process enables persons doing work under the organization's control to contribute to continual improvement.

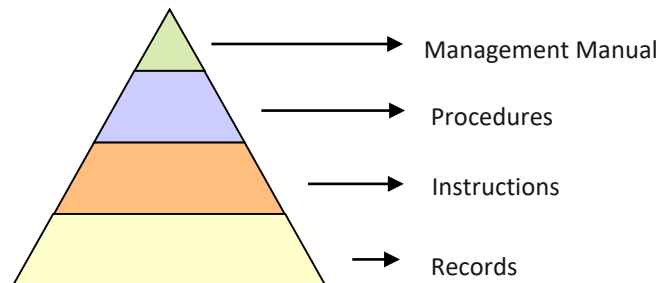
8.4.3 Eneo communicates externally information relevant to the Occupational Health and Safety management system, as established by the organization's communication process and as required by its compliance obligations. Procedure SGD 4.5.1/1 contains details of this process.



## 8.5. Documented Information

Documented information includes manual, procedures, records, information received or communicated by e-mail etc. Documented information is maintained as required by the Occupational Health and Safety Management System and those determined by the Eneo for effective operations.

Eneo has established a documentary structure for its OHSMS consisting of:



The above document structure describes the documents and records of the OHSMS.

### Creating & updating documented information

Following are ensured while creating & updating documented information.

- Identification & description (title, date, reference no.); Format is maintained in system or as hard copy.
- Reviewed and approved by authorized person (MD or Department head, as applicable).

### Control of documented information

Documented information is controlled so that these are available and suitable for use. Those are protected from improper use, loss of confidentiality, as applicable. For control of documented information, following are ensured:

- Approval for adequacy prior to issue & Distribution to concerned functions.
- Ensuring accessibility and retrieval when required.
- Ensuring storage and preservation
- Version or revision control after changes
- Defining retention period and disposition methods.
- Ensuring that documents of external origin are identified and their distribution controlled

## 8. OPERATION

### 9.1. Operation Planning & Control

#### 9.1.1. General

Operational planning is carried out by Individual departments of Eneo so that OHSMS requirements are met. The Planning covers :

1. Health and Safety requirements of product/services to be provided.
2. Processes, documents / documented information and resources needed for the product & services
3. Verification, inspection and measurement activities as applicable.
4. Acceptance criteria for the products
5. Adapting to work to workers.
6. On multi-employer workplaces, Eneo has implemented a process for coordinating the relevant parts of the OH&S management system with other organizations.

Eneo has controlled and planned the changes and reviews the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary. The organization has ensured that outsourced processes are controlled or influenced. The type and extent of control or influence to be applied to the process has been defined within the OHSMS management system. Eneo has maintained documented information to the extent necessary to have confidence that the processes have been carried out as planned.

### 9.1.2. Eliminating Hazards & Reducing OH&S Risks

Elimination of hazards and reduction of risks is carried out in line with the following hierarchy of controls:

1. Eliminate the hazard.
2. Substitute with less hazardous process, operations, materials or equipment.
3. Use engineering controls (guards) and reorganization of work.
4. Use administrative controls, including information, instruction and training.
5. Use adequate PPE.

### 9.1.3. Management of Change

Eneo has established a process for the implementation and control of planned changes that impact OH&S performance

1. New products, services and processes will be reviewed and changes made to the Health & Safety System as necessary.
2. Changes to work processes, procedures, equipment, or organizational structure will be reviewed and changes made to the Health and Safety System as necessary
3. Changes to legal and other requirements will be reviewed and changes made to the Health & Safety System as necessary.
4. Changes in knowledge or updated information about hazards and risks will be reviewed and changes made to the Health & Safety System as necessary.
5. Changes in technology will be reviewed and changes made to the Health & Safety System as necessary.

Eneo has controlled temporary and permanent changes to promote OH&S opportunities and to ensure they do not have an adverse impact on OH&S performance. The organization will review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary, including addressing potential opportunities.



## 9.1.4. Procurement

### 9.1.4.1 General

Procurement of products and services is carried out in line with the requirements of the company's Health & Safety System. Eneo has established controls to ensure that the procurement of services conform to its OH&S management system requirements.

### 9.1.4.2 Contractors

Eneo has established processes to identify and communicate the hazards and to evaluate and control the OH&S risks, arising from the:

1. Contractors' activities and operations to the organization's workers;
2. Organization's activities and operations to the contractors' workers;
3. Contractors' activities and operations to other interested parties in the workplace;
4. Contractors' activities and operations to contractors' workers.

The Organization has established and maintained processes to ensure that the requirements of the organization's OH&S management system are met by contractors and their workers. These processes include the OH&S criteria for selection of contractors. Suppliers and Contractors are to:

1. Comply with the requirements of the OHSMS and participate in OHSMS promotions.
2. Promptly report any unsafe working conditions, faulty equipment, hazards/risks, injuries or incidents

Details of the contractor management process are found in **SGP 4.4.6/3**

### 8.1.4.3 Outsourced Processes

Calibration of equipment is outsourced to external calibration agency. Transportation / delivery of products are often outsourced if necessary. The performance of the outsourced agencies is monitored and controlled. Necessary resources for the processes are provided by the management through HR and their responsibilities & authorities are defined and documented. Risks and opportunities for each process are determined and necessary actions are planned to enhance desirable effects and eliminate/reduce undesired effects. The Safety Director ensures that outsourced processes are consistent with legal and organization requirement so that OHSMS requirements are met. The Safety Director co-ordinates with the outsource provider to assist Eneo to address any impact that outsourcing has on its OHSMS performance.

## 9.2. Emergency Preparedness and Response

Eneo has established, implemented and maintained the process(s) needed to prepare for identify and respond to potential emergency situations and maintain a process to prevent or minimize OH&S risks from potential emergencies, including;

1. Preparing to respond by planning actions to prevent or mitigate adverse OH&S impacts from emergency situations;
2. Responding to actual emergency situations;
3. Taking action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact;
4. Periodically testing the planned response actions, where practicable;
5. Periodically reviewing and revise the process and planned response actions, in particular after the occurrence of emergency situations or tests;
6. Providing relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including persons working under its control.
7. The establishment of a planned response to emergency situations and including first aid;
8. The periodic testing and exercise of emergency response capability;
9. The evaluation and, as necessary, revision of emergency preparedness processes and procedures including after testing and in particular after the occurrence of emergency situations;
10. The communication and provision of relevant information to all workers and at all levels of the organization on their duties and responsibilities;
11. The provision of training for emergency prevention, first aid, preparedness and response;
12. The communication of relevant information to contractors, visitors, emergency response services, government authorities, and, as appropriate, the local community.

Eneo has maintained documented information to the extent necessary to have confidence that the processes are carried out as planned. In all stages of the process the organization has taken into account the needs and capabilities of all relevant interested parties and ensures their involvement. The organization has maintained and retains documented information on the process and on the plans for responding to potential emergency situations.




## 9. PERFORMANCE EVALUATION

### 10.1. Monitoring, measurement, analysis and evaluation

#### 10.1.1. General

Eneo has planned and implemented the monitoring, measurement, analysis and evaluation processes needed:

- Applicable legal requirement and other requirements;
- Its activities and operations related to identified hazards and OHSMS risks and opportunities;  To continually improve the effectiveness of the Occupational Health and Safety Management Systems.
- Operational Controls;
- Organization's OHSMS Objectives and KPIs;

Eneo has determined:

1. The criteria against which the organization will evaluate its OHSMS performance;
2. The methods for monitoring, measurement, analysis and evaluation, as applicable, needed to ensure valid results;
3. When the monitoring and measuring shall be performed;
4. When the results from monitoring and measurement shall be analyzed and evaluated and communicated.

Eneo has evaluated the performance and the effectiveness of the OHSMS management system. The organization has retained appropriate documented information as evidence of the monitoring, measurement, analysis and evaluation results. The organization has ensured, as applicable that calibrated or verified monitoring and measurement equipment is used and maintained, as appropriate. The organization is communicating relevant environmental performance information both internally and externally, as identified in its communication processes and as required by its compliance obligations. The organization has retained appropriate documented information as evidence of the monitoring, measurement, analysis and evaluation results.

#### 10.1.2. Evaluation of Compliance

Once the application of a particular requirement has been defined, the means of how compliance to the requirement is going to be ensured is to be established by Eneo, in consultation with appropriate personnel. Various means of ensuring compliance are available and include, but are not limited to the following:

1. Policies and/or procedures being established documented and implemented.
2. Training being provided.
3. Engineered solutions being implemented.
4. Instructional signs being displayed.

Details of the means of ensuring compliance are to be entered into the Legal and Other Requirements.

### Means of Verifying Compliance

1. Eneo uses leadership safety walks, site inspections and audits to ensure compliance has been determined, the means of how compliance to each requirement is to be verified on a continuous basis is to be established by the Eneo, in consultation with appropriate personnel.
2. Various means of verifying compliance are available and include, but are not limited to the following:
3. Internal auditing. (To verify compliance to the corresponding policies and/or procedures).
4. Periodic workplace inspections
5. Periodic review of records.
6. Periodic safety walks

### 10.2. Internal Audit

Eneo conducts internal audits at planned intervals to determine the Occupational Health and Safety Management System conforms to the planned arrangements, to the requirements of ISO 45001:2018 and to the Occupational Health and Safety Management System requirements including OH&S policy and objective established by the Organization, and that it is effectively implemented and maintained.

An audit program is planned, taking into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits. The audit criteria, scope, frequency, consultation and methods are defined through documented procedures and relevant records. Selection of Competent auditors and conduct of audits ensure objectivity and impartiality of the audit process. Auditors do not audit their own work.

The responsibilities and requirements for planning and conducting audits, and for reporting results and retaining documented information are defined in a documented procedure. The management responsible for the area being audited ensures that corrections and corrective actions are taken without undue delay to eliminate detected nonconformities and their causes and continually improve its OHSMS performance. Follow-up activities include the verification of actions taken and the reporting of verification results.

Documented information is retained by Management Representative as evidence of implementation of audit programs and audit results. Results of internal audits are reported to the higher management in review meetings.

### 10.3. Management Review

Top management of Eneo reviews the Organization's Occupational Health and Safety Management System annually, to ensure its continuing suitability, adequacy, and effectiveness. This review includes assessing opportunities for improvement and the need for changes to the Occupational Health and Safety Management System, including the quality policy and quality objectives.

The inputs to management review shall include information on

- Status of actions from previous management review
- The needs and expectation of interested parties, including compliance obligations / applicable legal requirements and other requirements. <sup>2</sup> External & internal issues and their changes
- Hazards, OHS Risk and opportunities.
- Performance & effectiveness of the OSHMS, covering:



- ✓ Extent to which OHS objectives are met
  - ✓ Process performance & conformity of products & services
  - ✓ Non-conformities and corrective actions
  - ✓ Monitoring & measurement results
  - ✓ Results of audits (internal & external) ☐ Performance of external providers.
- Adequacy of resources
  - Effectiveness of the actions taken on risks & opportunities
  - Fulfilment of its compliance obligations / results of evaluation of compliance ☐ Opportunities for improvement

The output from the management review will include any decisions and actions related to

- Opportunities for improvement,
- Any need for changes to the OSHMS
- Resource needs

Management Review minutes are generated as documented information and distributed to all concerned for review and necessary actions.

## 10. IMPROVEMENT

### 11.1. General

Management of Eneo determines opportunities for improvements and implements necessary actions thereof. These include:

1. Improvement in the products & services for meeting the requirements effectively and also considering future needs and expectations.
2. Implementing corrective actions and preventive measures to eliminate or reduce undesired effects.
3. Improving performance and effectiveness of Occupational Health and Safety Management System.

### 11.2. Incident, Nonconformity and Corrective Action

Eneo has planned, established, implemented and maintain a process to manage incidents and nonconformities including reporting, investigating and taking action, when an incident or a nonconformity occurs. A Quick Event Report (QER) SAR 10.2 Rev. 3 is used for incident or nonconformity notification by any worker or contractor who observes as soon as they observe one. When an incident or nonconformity occurs, including any arising from complaints, the organization:

1. Reacts in a timely manner to the nonconformity and, as applicable:
2. Takes action to control and correct it;
3. Deals with the consequences ;

4. Evaluates with the participation of workers and the involvement of other relevant interested parties, the need for action to eliminate the cause(s) of the incident or nonconformity, in order that it does not recur or occur elsewhere, by:
5. Reviews and analyzes the incident or nonconformity;
6. Determines the causes of the incident or nonconformity;
7. Determines if similar incident or nonconformities exist, or could potentially occur;
8. Reviews the assessment of OH&S risk as appropriate.
9. Determines and implement any action needed, including corrective action, in accordance with the hierarchy of controls and the management of change.
10. Reviews the effectiveness of any corrective action taken;
11. Updates risks and opportunities determined during planning, if necessary;
12. Makes changes to the QHSE management system, if necessary.

**Procedure SGP 4.5.2** sets out the different steps in the incident management process.

Corrective actions shall be appropriate to the significance of effects or potential effects of the incidents or nonconformities encountered including environmental impact(s).

The organization retains documented information as evidence of:

1. The nature of the incidents or nonconformities and any subsequent actions taken (Investigation reports, safety alerts etc.).
2. The results of any corrective action, including the effectiveness of the actions taken.

The organization communicates this documented information to relevant workers, and where they exist, workers' representatives, and relevant interested parties.

### 11.3. Continual Improvement

The organization has continually improved the suitability, adequacy and effectiveness of the OHSMS management system to.

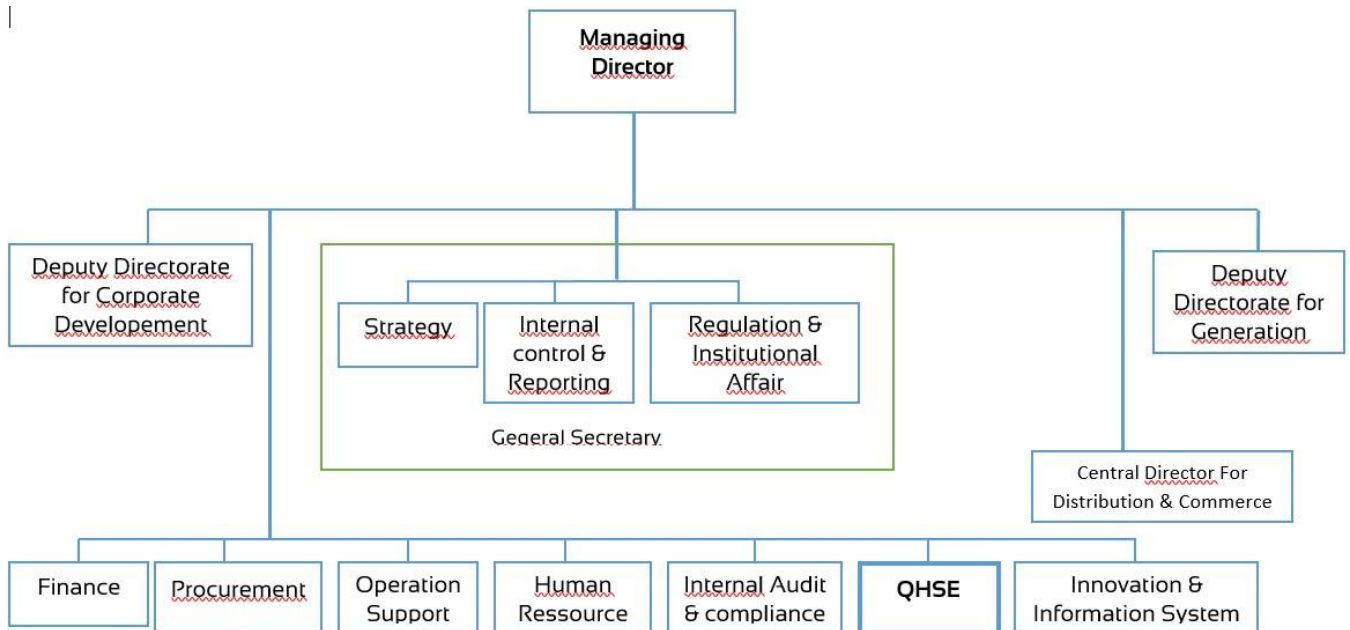
1. Prevent occurrence of incidents and nonconformities;
2. Promote a positive occupational health and safety culture;
3. Enhance QHSE performance.

The organization has ensured the participation of workers, as appropriate, in the implementation of its continual improvement objectives. The organization has considered the results of analysis and evaluation, and the outputs from management review, to determine if there are needs or opportunities that shall be addressed as part of continual improvement.

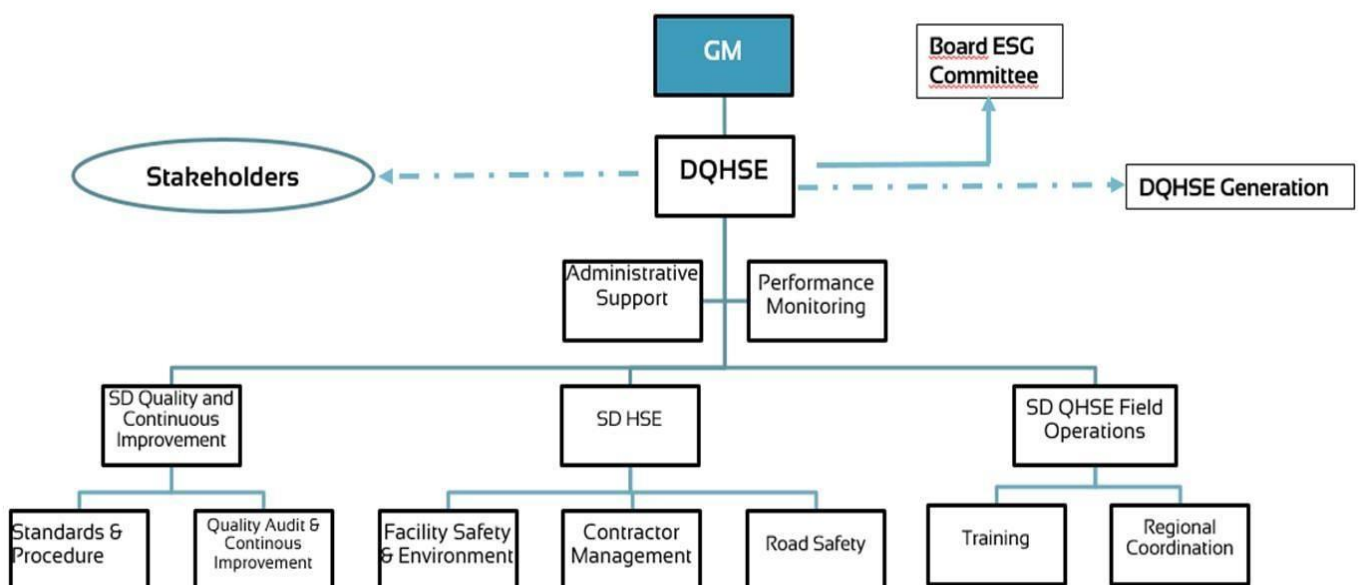


## 11. ANNEX 1

## Eneo Organisational Chart



## QHSE Organisational Chart



## ANNEXE 2: Eneo Process Mapping



## Process approach

