

# EHS Guidelines for S&S Subcontractors





This document applies to all Signify Subcontractors engaged in Systems & Services deals.

It defines environmental, health and safety management code of practice for Signify Subcontractors working on Customer sites. It is issued in support of the Subcontractors and is aimed at establishing and maintaining a high degree of EHS consciousness in the mind of every Subcontractor employee.

This code of practice is imposed by Signify and does not relieve Subcontractors from adhering to their general, legal, or contractual responsibilities.

It is required the leaders at all levels of the Subcontractor company are familiar with the content of these EHS Guidelines and will ensure the requirements outlined in this document are covered by Subcontractor company EHS organization/system and Subcontractor EHS Plan.

**Regulations issued by local authorities will always prevail if they are stricter than the requirements of these Guidelines. Compliance to local regulations is managed by Signify S&S and Market organizations.**

Signify Systems & Services and Market organizations are expected to deploy the content of these Guidelines to their Subcontractors. The manual may be translated into local language for ease of use at the country level or during execution at Customer sites.

Ver.	Title	Date	Notes
1.0	Philips Lighting EHS Handbook	2016-06-01	First edition.
2.0	QS-012375 Health & Safety Manual Field Projects	2019-02-19	Upgrade based on the Benelux document. Release of the document in the Quality System.
3.0	QS-012375 EHS Guideline for S&S Subcontractors	2021-04-15	Signify version. Revised and adjusted with QS-016515 Health & Safety Manual Systems & Services.

Credits: This publication is the result of the joint efforts of the Systems and Services Procurement and EHS Corporate at Signify

Dear Subcontractor,

At Signify, we relentlessly strive to create brighter lives and a better world. To realize responsibly this ambition, we have defined a number of injury prevention requirements for our activities in the field and we have put controls in place to minimize our environmental impact.

Whether you are an installer or components supplier, working for us you have a right to and you are responsible for a safe workplace. This EHS Guideline contains basic information for working safely and healthy. Reading through the manual you will build awareness required from you. So, to sustainably safeguard, in field projects and field services, injury free work without negative environmental impact, let us start with... ourselves.

We expect you to study the requirements included in this manual and to comply with the legal safety regulations of the country where you execute a field project or field service work. You need to comply with all requirements without exceptions when you are working for Signify. If in doubt, we expect you to seek for additional information by speaking up to your Supervisor or Safety Representative. Adopt a proactive position. Work safely yourself, ensure the safety of your colleagues and anyone else being present at as well as nearby your workplace.

In Signify we do not leave any chance to injury hazards when it comes to a daily work execution. Therefore, we want your focus on the three pillars of the injury prevention:

1. Attitude and behavior. Safety begins with yourself, your mindset, habits, behavior of yours and your co-workers. A lot depends on your attitude not to tolerate risky activities or situations.
2. Explicit safety standards obligatory for everyone. Understood and practiced daily. The same rules for everyone and no tolerance for bypassing or shortcutting.
3. Open and effective cooperation across the activity chain. It does not matter, a customer or a contractor, a designer or an installer, a project manager or a service engineer, everyone shares responsibility to contribute to the injury free workplace.

This EHS Guideline for S&S Subcontractors forms part of the overall Signify injury prevention system.

I ask you to use the guideline as a reference volume. We have compiled it, so that you can refer quickly to all the basic information and that you can execute the work safely and healthy without negative impact on the environment, with high respect for the risks in your workplace. Above all, with your engagement you can contribute to your own safety and that of others in the field project or field service workplace.

We depend on everyone's dedication for this! Can I also count on you?

Yours sincerely,

Nicola Kimm



Head of Sustainability, Environment, Health & Safety

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# I. Environment, Health and Safety at Field

## 1.1. Guiding principles

Safe and healthy work. With respect for people and the environment, with strict control of hazards to health and life. This is what Signify represents. This is what we want to achieve together with you.

In Signify we do our very best to secure safety of everyone. We invest in system of rules, training, engagement, and supervision. We create dedicated Health & Safety system. Acting always responsibly and rigorous execution in line with the established rules makes the system effective and ensures injury and illness free projects or services delivery.

Signify Health & Safety system focuses on strong injury prevention processes, addressing early identification and elimination of hazards in the workplace. The same time STOP-THINK-ACT-REFLECT is our fundamental approach for residual hazards in at-risk situations.

The objectives of the injury prevention processes are:

- ensuring adequate prevention and supervision resources are deployed,
- defining H&S Plan before project or service starts,
- organizing field workplace to minimize the risk for injury and illness as low as reasonably predictable,
- ensuring that all tools and equipment are regularly inspected,
- ensuring all involved parties and individuals are capable to meet safety requirements,
- engaging and executing injury prevention on daily basis,
- open, non-blaming dialogue to address residual risks and opportunities for improvement,
- acting always in full compliance with regulatory requirements.

Constructive communication and cooperation in the total chain of the field project or field service activities are essential enablers for effective daily injury prevention execution.

**Signify 10 Golden Safety Rules** outline our injury prevention principles for attitudes and behaviors of everyone involved in the delivery of a project or a service. Every Subcontractor employee is always expected to live up to these rules.

### **Safer work... starts with you**

Perhaps this sounds obvious, but... safer work starts with you. We expect you to strictly follow the rules included in this guideline and to **Speak Up** if you experience a hazardous situations. Seek out for additional explanation if this is required for your work or task. Address constructively your **colleagues** if they are exposing themselves to injury or illness risks.

# 10 golden safety rules

1



I am committed to my own safety and the safety of those around me, at work and at home

6



I speak out by reacting to hazards and escalating to my manager if needed

2



I follow safety instructions by understanding what is required

7



I stop risky activities as no unsafe activity should jeopardize our health

3



I know the risks of glass, heat, stairs, heights, chemicals, lifting and poor ergonomics

8



I travel safely by applying our safe driving rules or taking public transport

4



I respect machines & tools and never interfere with moving parts and equipment

9



I use electronic devices responsibly by not letting my mobile phone or laptop distract me

5



I learn to see by identifying safety risks before they turn into injuries

10



I manage occupational stress by ensuring a healthy work life balance and an open dialogue



Environmental incidents may occur in the project site in many forms:

- leakage of the chemical substance,
- spill of the chemical substance,
- damage to flora or fauna,
- polluted emission to the air,
- soil contamination,
- water contamination.

Prevention of the environmental incident is of the same importance as the injury or illness prevention. Any environmental incident identified in the project site must be internally reported and followed up. Reporting, investigating, and countermeasure process is the same as for injury or illness cases.

## 1.2. Framework and scope

Signify engages Subcontractors to deliver field projects or field services to its customers<sup>1</sup>. New lighting system installations, street lighting replacement projects, testing and commissioning are typical examples of a field activity. They are always carried out on customer premises, in many cases on construction sites.

Signify targets zero injuries and zero occupational illnesses during execution of the field projects and field services through strong injury prevention attitude and high employee engagement. The same expectation applies to Subcontractors providing their services to Signify.

This guideline is applicable to all Subcontractors for their contracted work within the scope of field project or field service. It outlines minimum requirements for injury, illness, and environmental impact prevention that Subcontractor must implement and adhere to in daily work execution.

The guideline is not intended as a sole training guide for Subcontractors, it does not eliminate the need for Subcontractors to apply their own EHS systems of work, ensuring compliance with local legislations.

The requirements defined in this Guidelines are referred to in written sub-contractual agreements. By signing off the sub-contractual agreement Subcontractor acknowledges the understanding of the Signify EHS requirements and commit to adhere to them without exceptions. Subcontractor EHS Plan must address further details of execution and adherence control processes.

In addition to the requirements outlined in this document, regulatory requirements of the country where the service is provided apply. They must be obligatory met by Subcontractor during field project or field service activities.

Each subcontractor undergoes qualification process for their capability to meet Signify EHS requirements prior the service is granted. Qualification process assures Subcontractor has adequate potential and maturity to meet the requirements during daily work execution.

Subcontractor is responsible to define and implement **Subcontractor EHS Plan** that will address in detail potential hazards and relevant countermeasures, including control of compliance to country regulatory requirements. Subcontractor must appoint **Subcontractor EHS Officer** who

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<sup>1</sup> In the context of these guidelines, the term “customer” will always refer to Signify’s customers.

will be overall responsible for the definition of Subcontractor EHS Plan and supervision of its daily adherence on the project or service site.

To ensure effective implementation of the Subcontractor EHS Plan following must be considered by Subcontractor EHS Officer.

- Signify may not be the sole definer of the working environment and safety requirements. Requirements imposed by local authorities, customer, or other contractors present at the customer site must be addressed and implemented.
- Work environment and corresponding safety risks always differ per site location. Subcontractor EHS Plan must define how specific risks of every new location where the project or service is delivered are assessed and managed.
- Legal regulatory requirements differ from country to country.

**In case Signify Subcontractor engages other Subcontractors within the scope of the agreed service, the prime Signify Subcontractor remains solely responsible for adherence of its Subcontractors to Subcontractor EHS Plan, including liabilities legally imposed in the contractual agreement.**

Signify Subcontractor must implement at customer site their own On-site Supervisors for the period when service is provided. Subcontractor Supervisors must be present all the time during the execution of subcontractor activities.

Subcontractor on-site supervision must ensure that:

- countermeasures defined in Subcontractor EHS Plan are met in daily work practice,
- any deviations from Subcontractor EHS Plan and/or residual hazards are identified and addressed timely,
- task is STOPPED and not continued until the EHS requirements are fully met.

Identified EHS performance gaps and opportunities for improvement must be discussed during regular safety review meetings and addressed with adequate countermeasure actions.

### 1.3. Subcontractor EHS Officer

Signify requires Subcontractor to formally appoint **Subcontractor EHS Officer** who will be overall responsible for the definition of Subcontractor EHS Plan and for the control of its daily adherence at the Customer site.

Subcontractor EHS Officer must have EHS educational degree or be certified for EHS competences relevant to the EHS risks in the scope of work agreed contractually.

The name of the Subcontractor EHS Officer shall be formally communicated to Signify Project Manager or Field Service Manager.

Subcontractor EHS Officer shall liaise on a frequent basis with Signify Project Manager or Field Service Manager. The officer will regularly participate in the Project or Service Safety Review meetings and will report Subcontractor EHS performance.

Subcontractor EHS Officer has an essential role to ensure disciplined execution of Subcontractor EHS Plan.

## Tip

**In doubt about the safety measures** when conducting the work or in a situation you are in?

Are you unable to **organize** proper measures yourself?

Directly ask your **Subcontractor EHS Officer** for assistance.



Subcontractor EHS Officer **will support** you and raise your safety awareness through:

- engaging with you in open dialogue about safety,
- drawing the attention of supervisors to observed safety issues,
- eliminating the issues by initiating actions to make your work safer,
- sustaining the solutions by deploying enhanced safety rules.



Subcontractor EHS Officer  
Opens the dialogue on safety concerns

## 1.4. Continuous improvement strategy

Whatever control measures are implemented, at some point you might be confronted with at-risk behavior, at-risk workplace condition, dangerous situation (near-miss), employee injury, or environmental incident. To address this, Subcontractor Supervisors are expected to engage employees in workplace hazards identification on daily basis and to relentlessly undertake actions to eliminate them.

Signify wants all Subcontractor employees to co-share fundamental philosophy that **every injury, illness, or environmental incident can be prevented**.

To capture as many as possible improvement opportunities Subcontractor is required to implement as part of their daily management the following continuous injury prevention processes.

- Daily Safety Talk routine.
- Daily Workplace Inspection.
- Hazard, spill, near miss or opportunity for improvement reporting practice.
- First aid, occupational injury and illness, environmental incident reporting.

It must be ensured that these prevention processes are location specific, conducted in local language for ease of use by on-site employees.

Implemented injury prevention processes are defense lines aiming to capture and eliminate injury, illness, or environmental incident hazards in the workplace before the hazards lead to incidents. When injury, illness or environmental incident occurs during Subcontractor work execution, it indicates gap in the defense lines.

Subcontractor EHS Officer must investigate occupational injuries, occupational illnesses, and environmental incidents to identify root cause, defense lines gaps and address relevant countermeasure actions to sustainably eliminate identified root cause and close defense lines gaps. Management of the Subcontractor is expected to review the investigation reports and to control completion of countermeasure actions.

Subcontractor EHS performance, closure of identified defense line gaps and other opportunities for improvement are discussed with Signify Project Manager or Field Service Manager during regular safety review meetings to ensure and drive the overall continuous improvement process.

## 2. Subcontractor qualification and contracting

### 2.1. Qualification and validation

Together with our Subcontractors we ensure that our services fulfill our brand promise as well as comply with local regulatory and environmental requirements. We develop, educate, coach, motivate, challenge, and support each other to achieve this objective.

At the initial phase, Subcontractors undergo a qualification process to verify their capability to implement the Signify injury prevention requirements. Amongst others, the qualification process assures that a Subcontractor is adequately resourced to define the Subcontractor EHS Plan and to ensure rigorous daily execution of the requirements outlined in the plan. During the qualification process it is also verified that the Subcontractor poses legally required licenses and certifications for the specific type of work to be conducted. The qualification is done by Signify Procurement Managers.

Without positive qualification, outcome a Subcontractor will not be considered as the potential partner for field project or field service execution.

Signify management system is based on ISO9001, ISO14001 and ISO45001 standards, supporting company to reach world class performance for our products and services. Subcontractors having their management system certified with one of these standards present higher potential for positive qualification.

### 2.2. Sub-contractual agreement

Every Subcontractor must ensure health and safety of their employees at work as well as must protect the environment from negative impact of the work conducted. These duties oblige not only to ensure safe workplace conditions but also to implement safe systems of work, including an effective processes for employee information, instruction, training, and supervision.

In this respect, Subcontractor obligation is regulated by written sub-contractual agreement. The agreement usually consists of following parts:

- Framework Subcontract, including Annex IV: Environmental Health and Safety Schedule,
- Project Subcontract.

The framework subcontract regulates in the content of “Annex IV: Environmental Health and Safety Schedule” specific Signify EHS requirements. Amongst others the Annex IV refers directly to the requirements outlined in these EHS Guidelines for S&S Subcontractors.

Project sub-contract regulates location specific scope of work and detailed description of subcontracted activities, including applicable main contract provisions

By signing the sub-contractual agreement, the Subcontractor confirms understanding of the Signify/Customer/Country Regulatory EHS requirements and legally agrees to comply with them.

Appointed Subcontractor EHS Officer must formally confirm in writing the understanding of contractually agreed EHS requirements, acknowledging responsibility for their implementation.

Breach of the EHS requirements defined in the signed sub-contractual agreement may lead to legal action undertaken by Signify. Sanctions related with deficiencies and violations identified during on-site EHS audits or in the accident investigations and provisions for their application are specified in Schedule I to the Annex IV.

### 3. Risk management

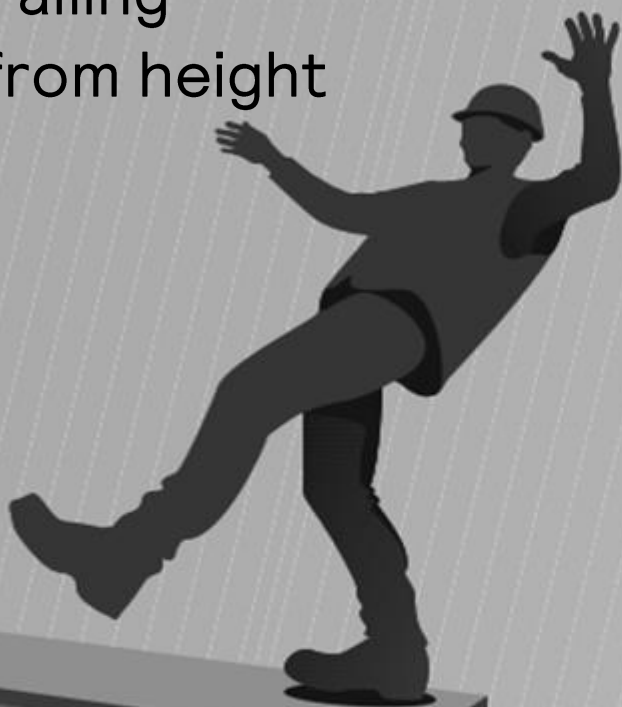
#### 3.1 Most frequent risks

Though measures are taken, incidents still occur in the workplace. We expect Subcontractors relentlessly strive to prevent them. There are no two workplaces that are the same. It makes big difference whether you are working alongside a road, at height, or in an enclosed space. We must be sharp and speak up on the following six most frequent injury hazards contributing significantly to workplace injuries. Include them in the initial safety training.



Tripping

Falling  
from height



Falling  
objects



Hit by  
flying objects



Crushing



Hit against  
projecting objects



## Tip

Do you want to **minimize** these six and other risks?

**Discuss** them regularly during your daily workplace **inspections** and in your daily **safety talks**.

## 3.2 Hazardous tasks

Some of the tasks conducted in the workplace pose specific high-risks to the life and health of the employee engaged in the task and the other persons in the vicinity of the place where the task is carried out. These are hazardous tasks and Subcontractor must ensure they are executed in a safe and controlled manner.

To achieve effective level of control for hazardous tasks, Signify requires implementation of a dedicated Work Permit procedure as part of the Subcontractor EHS Plan.

Signify requires the following, but not limited to, tasks to be covered by Work Permit procedure.

- Work at height
- Work with electricity
- Hot work
- Confined space entry
- Lone working
- Hoisting
- Excavation/Trenching
- Gas cylinders handling
- Hazardous chemicals handling
- Work with asbestos

Subcontractor On-site Supervisors must control strict adherence to specific requirements of applicable Work Permits in daily execution.

The list of hazardous tasks must be included in Subcontractor EHS Plan.

Working on or nearby a road or highway entails specific hazards that carry severe injury and fatality potential. Rigorous systematic rules for traffic control must be applied. Signify requires Subcontractor to set up the following zones when working on or nearby a road or highway.

- Advanced warning area with “work ahead” signaling, flashing arrow/lights.
- Transitional area.
- Buffer zone, including safety truck with TMA (Truck Mounted Attenuator).
- Work area.
- Termination area.

Subcontractor EHS Plan or dedicated method statement must define the set up of the zones in detail. The set up must every time reflect the characteristic of the project location.

Subcontractor EHS Officer is responsible to ensure that deployed traffic control rules are compliant with local regulatory requirements (e.g. Local Governmental Permit). In case of difference between Subcontractor EHS Plan and Local Governmental Permit the stricter control rules must apply.

## 3.3 Work Permit system

Work Permits are an essential part of safe working practice for construction and maintenance operations. The permit specifies the task to be done, identifies the foreseeable hazards, and defines precautions that must be taken in carrying out the task. It allows to start the task only after defined precautions have been implemented.

Signify requires Subcontractor to implement Work Permit procedures for the hazardous tasks listed in the previous section as the minimum requirement. Work Permit procedure is also in many cases required by customers as a method for control of subcontractors work at the customer sites.



Work Permits may be also regulated by local authorities. The regulatory requirements will always prevail if they are stricter than the requirements outlined in this document. Compliance to local regulations is managed by Subcontractor EHS Officer.

Work Permit procedures content and related system of handling them, including daily authorizations, must be defined in Subcontractor H&S Plan.

While designing and implementing the permits, it is very important to consider hazards, not only for employees directly involved in the tasks, but also for other employees, visitors, public citizens potentially present in the vicinity of the location where the task is conducted.

### 3.4 Last Minute Risk Analysis (LMRA)

Although there are many risk control measures taken in the workplace, Subcontractor employees might be exposed to non-routine activities that pose residual uncontrolled safety risks. If this situation occurs, ultimately the employee themselves must take responsibility to safeguard their safety. This is where the Last Minute Risk Analysis (LMRA) practice must be utilized. The LMRA is the risk control assessment to conduct as a final safety self-check before engaging in a non-routine task.

The following questions ensure that an employee can work through a LMRA process properly:

- Do I know exactly what to do and am I capable to do it?
- Have I had an orientation done by my supervisor in which all the risks for my task were discussed?
- Do I recognize possible hazards and how I can prevent them?
- Are there other activities in the vicinity of my work area that can jeopardize my safety?
- Do I know what equipment, tools, and personal protection I need to perform my task safely and are they available?
- Are workplace condition and weather conditions such that I can perform my work safely?
- Do I know what to do in case of emergency?

Signify strongly encourages LMRA practice be implemented in the Subcontractor EHS Plan and deployed to Subcontractor employees as the control measure for possible non-routine activities occurring at the job site.

### 3.5. Weather conditions

Weather conditions influence the work environment. Cold, heat, hard wind, sun, rain, and snow increase the risks addressed in the method statements and introduce weather specific hazards. Consider slippery surfaces, cold stress, or heat stress. In a thunderstorm, you can be exposed to a lightning strike.

Subcontractor EHS Plan must address the controls for adverse weather conditions. Below you will find examples of required measures per specific weather condition at the workplace.

#### Cold

- Wear protective workwear covering all body parts.
- Schedule “cold tasks” for the warmer part of the day.
- Reduce the physical demands of employees.
- Provide warm liquids to workers.
- Provide warm areas for use during break periods.

### Heat

- Keep regular rest breaks. The breaks should be taken in a cool area.
- Assure easy access to the drinking water. Advise employees to drink a lot of water.
- Increase air circulation. Use fans or air conditioning.
- Ensure new employees have time to get acclimatized. They should not work full time in a high heat area. It takes about one week for the body to adjust to working in the heat.
- Ensure that employees recognize the effects of heat exposure (heat exhaustion, sun stroke, dehydration, etc) and related effective prevention measures.

### Wind

- Prevent light materials from blowing away by securing them.
- Consider that large surfaces (materials) are susceptible to wind.
- Additional regulations and instructions apply for specific type of work.

### Bright sunshine

- Require employees cover their head.
- Require employees to regularly apply sunscreen protection lotion with a high protection factor.
- Assure easy access to the drinking water. Advise employees to drink a lot of water.
- Wear protective workwear: at least long trousers and preferably a long-sleeve shirt, safety glasses with UV filters of degree appropriate for the sunshine exposure.
- Work according to an adapted work (heatwave) schedule.
- Ensure that employees recognize the effects of heat exposure (heat exhaustion, sun stroke, dehydration, etc) and related effective prevention measures.

### Thunderstorm

- Subcontractor Supervisor must communicate to the employees response action.
- Use shelters in a building or metal cabins, like a car or digging machine.
- Do not take shelters in the vicinity of metal objects such as fences, light masts, building lifts and scaffolding.
- Do not take shelters under single trees, along the edge of woods, or in an open field.
- Do not touch metal parts, cables, or pipes.

## 4. Subcontractor EHS Plan

### 4.1 General requirements and safety organization

Scope of mandatory countermeasures required in Subcontractor EHS Plan is based on the EHS risk categorization for specific field project or specific field service. Categorization criteria are outlined in the table below.

Service scale and duration	Hazardous tasks	Are hazardous tasks in the scope of the subcontractor service?	EHS risk category
Subcontractor service with a scheduled volume of work equal or <b>more than 500 person-days</b> on a project site.	Classification not used	Classification not used	HIGH
Subcontractor service with a scheduled volume <b>less than 500 person-days</b> on a project site.	Work at height. Work with electricity. Hot work. Confined space entry. Lone working. Hoisting. Excavation/Trenching. Gas cylinders handling. Hazardous chemicals handling. Work with asbestos.	Yes	HIGH
		No	MEDIUM

Mandatory list of countermeasures included in Subcontractor EHS Plan per EHS risk category are listed in the table below.

EHS risk	Mandatory countermeasures in Subcontractor EHS Plan
HIGH	Prevention of work-related ill health. Statement on the applicable governmental permits, licenses, certifications. Task risk analysis and safe work method statements. Permission to work system for hazardous tasks. Requirements for vehicles and site traffic rules (if applicable) Daily safety talk. Daily project site inspections. Weekly project safety review meeting.
MEDIUM	Prevention of work-related ill health. Statement on the applicable governmental permits, licenses, certifications. Task risk analysis and safe work method statements. Requirements for vehicles and site traffic rules (if applicable). Daily safety talk. Weekly project site inspections. Monthly or milestone-based project safety review meeting.

In case of Subcontractor conducts similar activities in a different location, Subcontractor EHS Plan must address the risks related to different characteristics of the workplaces in the specific locations. Usually, the plan refers to method statements that are revised and re-defined per location.

The content of Subcontractor EHS Plan must be deployed to all Subcontractor Supervisors. The Subcontractor Supervisors must be competent and adequately trained to control Subcontractor EHS Plan execution. They must be present all the time at the customer site

location when subcontractor activities are delivered. The Subcontractor Supervisors are responsible for rigorous daily execution of the controls defined in the plan.

**No activity or task must be undertaken with an unacceptable risk (STOP-THINK-ACT-REFLECT).** Only, if evaluated risk is reduced through the relevant countermeasures to acceptable level, activity or task can be conducted.

The execution of Subcontractor EHS Plan and the quality of the supervision must be continuously controlled by Subcontractor EHS Officer.

Subcontractor EHS Officer is responsible to document the Subcontractor EHS Plan in the Subcontractor EHS Plan file and provide relevant information on request to Signify.

## 4.2 “Fit to work” medical assessments

To be sure an employee can safely conduct a job and do specific tasks, it must be controlled that all employees engaged in the contracted activities went through “fit to work” medical assessment and were allowed to work with no work-related health restrictions. The purpose of the assessment is to determine if medically the employee can perform the job or tasks in the foreseeable working conditions.

Hazardous tasks planned in the scope of work may require additional, specific medical assessment of the involved employee health.

Subcontractors are required to ensure within their management system to identify and secure relevant medical assessments of Subcontractor employees.

Specific considerations must be given to control the work exposures for:

- pregnant women,
- employees with identified health restrictions (e.g. heart patients),
- young employees of age 16 – 18.

Subcontractor EHS Officer is required to control local regulatory requirements of work related general and specific (hazardous tasks) medical assessments. Regulatory requirements always prevail if they are stricter than the requirements outlined in this document.

Documented evidence confirming positive work-related medical assessments for all Subcontractor employees involved in the contracted activities must be archived in the Subcontractor EHS H&S Plan file.

## 4.3 Task risk analysis and method statements

Signify requires high standards regarding Environmental, Health & Safety conditions of work for all employees working at customer sites on behalf of Signify. This includes Subcontractor employees.

In many countries local legislation requires employers to assess the risks to which their employees are exposed and to implement adequate measures to mitigate and control identified risks.

Subcontractor management and all levels of Subcontractor supervision must understand they are, as the employer, responsible to meet this requirement.

High standard of work starts with rigorous task risk analysis and implementation of safe systems of work in line with known best practices. Implementation of the safe systems of work aims to ensure during daily execution safe workplace for all the Subcontractor employees, co-workers from other companies and other people close by.

Signify requires all tasks in the scope of the subcontracted service to be listed and task risk analysis followed with method statements to be completed for all the tasks before work commences.

Undertaking risk analysis in essence requires to critically look at task content executed in the workplace and to identify where involved employees or other people can be harmed. Then countermeasure actions must be defined to prevent the specified harm from happening.

Follow five basic steps:

1. Identify hazards that are in your work area
2. Describe who may be harmed and how
3. Evaluate the risk level (exposure x likelihood x severity)
4. Define and detail control measures that must be put in place
5. Ensure the control points are clearly written down in the method statement

Due to severity some hazards will pose high risk, e.g. when working at height. Other hazards will be a lower risk. Typically for the high risk tasks a Work Permission system must be implemented. Where it is relevant, a local authority will be involved in issuing a written Work Permission.

For similar tasks that are carried out repetitively at a variety of customer sites, a generic risk assessment can be developed. However, it is always necessary to revise if the circumstances of the work environment at particular site do not present additional or changed hazards.

Revision of the risk assessment for the particular site must be documented in the Subcontractor EHS Plan file.

Based upon a task risk analysis, a safe system of work must be defined and documented in a method statement.

Signify requires Subcontractors must have in advance, a written method statements for the tasks in the scope of subcontracted service.

Method statements must, in a short and simple form, highlight the employee risk related to a particular task and relevant control elements that must be put in place to ensure safe system of work. It is a document describing exactly how a task is to be carried out in a manner which is safe and without risk to health or environment. It should be structured to be easily comprehensible and enable employees to carry out the work in line with the information provided.

During method statement definition a consideration should be given to the following elements that secure a safe system of work:

- emergency contact,
- a safe place of work,
- a safe work equipment and tools,
- managing potentially hazardous substances,
- STOP-THINK-ACT-REFLECT rule,
- information, instruction, Speak Up communication, training, and supervision,
- provision of welfare facilities at our customer's site for toilet/washing facilities and eating/resting facilities,
- adequate information, instruction, training and supervision; including non-native speaking employees.

Content wise a method statement shall include as minimum:

- Basic information
  - The name of the project and the customer.
  - Subcontractor information
  - Reference document number and issue date.
  - A summary of what the work is.
  - Location where the work is taking place, including address.
  - Start and expected completion dates.
  - Names and phone numbers of Environment Health & Safety contacts
- Detailed information
  - First aid procedures, including the qualified first aider on site.
  - Work Permits any other legal requirements.
  - Required staff training.
  - All equipment that will be used (e.g. boom lifts, scaffolding, etc.), and who is qualified to use it
  - Required Personal Protective Equipment.
  - The arrangements for sustainable waste disposal.
  - General Safety rules, including STOP-THINK-ACT-REFLECT.
- Order of operations

This section should be the most thorough and detailed. Step-by-step instructions must be provided as to how the task should be carried out. Based on task risk analysis, it must be clearly outlined what hazards will be present during the work execution and what controls are mandatory to follow.

For similar tasks that are carried out repetitively at a variety of customer sites a generic method statement can be developed. However, it is always necessary to revise if the circumstances of the work environment at particular site do not present additional or changed hazards.

The revision of the method statement for particular site must be documented in the Subcontractor EHS Plan file.

Subcontractor employees must be trained from the content of method statement. The employees sign off is required as read and understood the content of the method statement. Sign off sheets must be documented in the Subcontractor EHS Plan file.

The adherence to the rules defined by method statement by every Subcontractor employee is fundamental to ensure the injury free environment for all employees and other people present at customer site. Subcontractor Supervisors are responsible to manage this adherence in daily execution. Important is to engage employees and create culture of speaking up about hazards in the workplace directly to Supervisors or during Daily Safety Talks. Bottom up inputs will make the task risk assessment and method statements sustainably reliable.

## Stop-Think-Act-Reflect

Unsafe situation, potential spill, or near miss? Report it!

Encountered or experienced a near miss, a potential spill, a fire incident? You are obliged to report this, so we can learn from it.

Stop the work. Report it to your supervisor and wait for further instructions.



Subcontractor EHS Officer is overall responsible to ensure task risk analysis and method statements are completed and form part of Subcontractor EHS Plan. Typically, the Subcontractor EHS Officer will involve Supervisors to compile their content and ensure effective execution.

Subcontractor EHS Officer must ensure compliance of the task risk analysis and method statements content with local regulatory requirements.

#### 4.4 Workplace organization and daily inspections

Organization of the site and housekeeping management is an essential part of the injury prevention practice. Keeping site in order is important not just for safety of the workers and visitors, but for productivity and simplicity.

Site organization involves:

- Barricading and appropriate signage to ensure restricted access,
- layout plan for incoming and outgoing materials,
- proper use and storage of machines and tools,
- hazardous materials handling,
- disposal of waste,
- site information and signs,
- first aid and fire-fighting facilities,
- site security measures.

Subcontractor Supervisors must manage the required site conditions. It must be ensured that the space, light, site accessibility, and general facilities are available on site and sufficiently enabling to conduct the work safely. If applicable, it is important to verify energy outlets provided by the site host are in good conditions and meeting specific technical standards for safe use.

Working areas must be kept clean and tidy. Clean and tidy work area reduces the risk of accidents and improves fire safety.

Signify requires Subcontractor to follow these housekeeping rules in daily on-site work execution:

1. Stack and store materials safely. Poorly stacked materials can block access routes or topple over causing crushing injuries or damage to property.
2. Maintain a work area tidy. Check your work area at regular intervals throughout the day and clear up as you go along. Sort out trip hazards and piling material sooner rather than later.
3. Don't let cables trip you up. Make sure you route the lead away from walkways or access routes.
4. Keep access/egress routes clear. Don't leave materials/tools/equipment in gangways and corridors where they might cause a trip or hit against hazards.
5. Put tools away when task is done. Don't leave tools lying around. If it's out of use, it should be put in its designated place, or at least out from under feet.
6. If it is broken, fix it. Damaged tools or equipment must be taken out of use so that they can either be repaired or replaced.
7. Designate an area for rubbish and waste. Create an area for separated waste to go and remove it regularly. A best practice solution is to segregate waste types for reuse, upcycle, recycle or incineration.

Good housekeeping requires commitment from everyone. Subcontractor Supervisors are required to raise awareness on good housekeeping during Daily Safety Talks. A good housekeeping requires engagement from everyone. If there is any object lying on floors, stairways, or passages that could cause people to trip and fall, they need to be picked up and put it in a safe place regardless of who's responsibility it belongs to. Waiting for someone else to move it, might cause the next person to get hurt.

To ensure the effective site organization and housekeeping Signify requires Subcontractor Supervisors to conduct daily workplace inspections and Subcontractor EHS Officer to conduct regular workplace inspections. It is good practice that Subcontractor Leaders are also involved to conduct workplace inspections.

Dedicated location specific checklist must be used to facilitate workplace inspections. In case check point is not met immediate action must be put in place to solve the issue or temporary countermeasure must be installed until permanent fix is implemented. In case identified gap can't be solved it is Subcontractor Supervisor responsibility to stop the concerned task and to escalate the issue to Subcontractor EHS Officer as well as Subcontractor Project Manager.

**No activity or task must be undertaken with an unacceptable risk.**

Subcontractor EHS Officer is responsible to ensure the structure of workplace inspections along with corresponding workplace inspection checklist is defined, implemented, and documented as part of Subcontractor EHS Plan. The filled in workplace inspection forms must be archived in the Subcontractor EHS Plan file.

## **4.5 Machines and tools (working equipment)**

Machines or common tools such as small hand tools, drills, grinders, voltmeters, etc..., must be suitable and appropriate for the purpose defined in the method statement. They must conform to required (local) standards and regulations. They must also be maintained throughout their lifecycle as per manufacturers recommendations. Measuring equipment must be calibrated.

Subcontractor employees must visually inspect equipment prior of use. Any defects, faults or damages, invalid period of technical inspection or certification must be reported to the Subcontractor Supervisor. A defective equipment must be tagged out, removed from the workplace, and secured from unintended use.

Subcontractor employees must be trained and competent to use the equipment. Operating manuals must be available in the language of the users. They should only use them for their intended purpose. Subcontractor Supervisors are responsible to ensure equipment is not misused.

The use of improper equipment increases the chance of all kinds of injuries. Consider physical injuries, electrocution, hearing damage, harmful substances inhalation, excessive heat, or fire incident.

Several simple equipment safety rules can considerably limit any risks.

- Only use safe, undamaged, calibrated, and approved machines, tools, and equipment.
- Use the right equipment for the right job.
- Be trained to use the equipment.
- Always read manufacturer manual or instruction before using an equipment. Make sure you know what to control and how to control.
- Wear the appropriate Personal Protective Equipment.

- Ensure that the inspection sticker is legible and valid.
- STOP-THINK-ACT-REFLECT when suddenly a non-routine activity occurs (machine jammed, strange noise).
- Perform maintenance of equipment only by qualified personnel.
- Keep your equipment clean and stored safe from possible damage.

In general, Signify requires Subcontractor to use only equipment owned by the Subcontractor and refrain from using equipment owned by any third party. If this is not possible a dedicated equipment safety protocol must be implemented ensuring the proper safety validation of the third party equipment and adequate training of Subcontractor employees.

Subcontractor EHS Officer is responsible to ensure the list of equipment in use along with corresponding training requirements are part of the Subcontractor EHS Plan. In the list of equipment an indication must be given which equipment must be calibrated and PAT (Portable Appliance Test) tested.

The list of equipment, calibration/testing/inspection/maintenance records, and training records must be archived in the Subcontractor EHS Plan file.

## 4.6 Vehicles and traffic rules

Specific requirements for vehicles and traffic rules apply when vehicles use is planned in the scope of the subcontracted work.

As minimum requirement Subcontractor must ensure all vehicles entering a site must be equipped with:

- Fire extinguishers. Size and type of a fire extinguisher shall depend on the type of the vehicle (trucks, busses, autobusses).
- Reverse motion alarm (back-up beeper).
- Safety triangle.
- Spare tyre(s), hydraulic jack.
- Windscreen wipers.
- Horn.
- Flashing beacons.
- Front and rear headlights in good operating conditions.
- Three-point safety belts for driver and passengers.

The vehicles must hold an applicable valid registration and technical inspection certificate. Drivers must hold valid driving license.

Driver and passengers must fasten safety belts at all times when vehicle is in motion.

Traffic rules are always site specific. Subcontractor EHS Officer is responsible to ensure that traffic rules are included in the Subcontractor EHS Plan and rigorously implemented on-site. Deployed traffic rules must be compliant with local regulatory requirements.

In case of working on public roads, all require governmental traffic rules, including speed limits, signaling and barricading, safe working distances, etc. must be strictly adhered to.

## 4.7 Emergency response and warning signs

As part of the safe workplace organization Signify requires Subcontractor to ensure a visual safety information, warning notices and mandatory signs are displayed at the job sites.

The information must be provided in a native language of the employees to ensure it is possible to read and understood. Where an information board is impossible to set up the information must be provided via leaflets or mobile phone applications.

See below example of site safety information board.



When working on the sites managed by main investors Subcontractor Supervisors must deploy to the employees emergency response procedures of a main investor relevant to the area in which they will be working.

During site safety induction training every employee and visitor must mandatorily receive following information.

- Emergency alarms, evacuation signs and routes, extinguishers, assembly points.
- First aid facilities and access to First Aiders (Emergency Response Team – ERT).
- External emergency services.
- Who to contact and what to do in case of accidents, including location of accident register.
- Security controls and out of regular hours rules.

Subcontractor EHS Officer is responsible to include emergency response protocol and related information in safety induction training content and document it in a Subcontractor EHS Plan file.

Safety signs must be implemented and recognized to effectively communicate about safety risks. Everyone can understand the signs quickly, they continuously remind and drive attention to specific risks. Set of colors and shapes define following categories of signs.

- Yellow color indicates a warning – be careful! Warning signs are always triangular.
- Sign with a red edge means that something is prohibited. These prohibition signs are always round.
- Blue indicates a command that obliges you to strictly follow. Mandatory signs are always round.
- Green color means emergency and first aid information. The signs are rectangular.
- Firefighting equipment is indicated with a red square sign.
- There are also signs that provide information or instructions. These signs are always blue and square.

Refer to ISO 7010 “Graphical symbols – Safety colours and safety signs – Registered safety signs” for the complete set of the standardized signs and to check the latest updates.

## Warning signs



Corrosive  
substance



Non-ionizing  
radiation



Electricity



Biological  
hazard



Explosive  
material



Danger



Toxic  
material



Overhead  
load



Low temperature /  
Freezing conditions



Laser  
beam



Flammable  
materials



Oxidizing  
substance



Radioactive material /  
ionizing radiation



Harmful  
substances



Magnetic field



Floor level  
obstacle



Industrial  
vehicles



Drop / fall

## Prohibition signs



Not drinking  
water



Do not touch  
Electrical hazard



Do not touch



Power cable touching  
prohibited



No access for  
unauthorized persons



Do not extinguish  
with water



Smoking  
prohibited



No access for  
industrial vehicles



No access for  
pedestrians



No open flame  
Fire, open ignition source,  
and smoking prohibited

## Mandatory signs



Wear respiratory  
protection



Wear face  
shield



Wear ear  
protection



Wash your  
hands



Wear eye  
protection



Take care





Wear safety harness



Wear protective gloves



Wear head protection



Wear protective clothing



Wear safety footwear



Use this walkway

### Emergency and first aid signs



Stretcher



First aid



Doctor



Safety shower



Emergency exit



Eyewash station



Direction to follow



Emergency telephone



Emergency assembly point

## Firefighting equipment signs



Fire  
extinguisher



Fire  
blanket



Fire alarm  
call point



Fire hose  
reel



Fire  
ladder



Direction  
arrow



Fire emergency  
telephone

## Information and instruction signs



Drinking  
water



Lift



Telephone



Access for  
wheelchair users



Exit

## 4.8 Environmental aspects

Signify requires Subcontractor to always dispose waste using the correct waste streams and secure recycling to the maximum possible extent. Waste should be removed regularly to secure good housekeeping and to minimize potential negative impact to Subcontractor employees as well as reduce fire hazards.

Hazardous waste streams must be identified and the handling of hazardous waste must be controlled with task risk assessment and method statement. Specific focus is required to

products containing hazardous materials. The handling of products with potential breakages and their disposal must be defined and conducted in a safe way.

Subcontractor EHS Officer is responsible to define and implement waste handling rules at the job site. The waste handling rules must form part of Subcontractor EHS Plan and be documented in Subcontractor EHS Plan file.

Subcontractor EHS Officer must ensure compliance to local regulatory requirements relevant to environmental protection.

## 4.9 Personal Protective Equipment

Personal Protective Equipment (PPE) is very important. It must be used if the source of hazard cannot be fully eliminated in the workplace. Task risk analysis and methods statements must mandatorily indicate required Personal Protective Equipment.

Essential is to consider that PPE does not prevent incidents and must never be used as a substitute for control measures eliminating hazards from the workplace. PPE is last line of defense and only limit the possible consequences of an incident.

Personal Protective Equipment typically include but not limited to:

- Safety shoes
- Hard Hat
- Safety glasses
- Ear protection
- High visibility workwear
- Cut resistant gloves
- Fall arrest equipment
- Respiratory Protective Equipment

The responsibility lies with the employer ... responsible to:

- define adequate type of PPE
- provide PPE to the employee
- provide instruction on how to use PPE
- supervise the correct use of PPE

... and the employee ... who is responsible to:

- inspect PPE before use
- use provided PPE at all times in line with method statement requirements
- maintain it in a good condition
- regularly check the fit of the PPE

Personal Protective Equipment must itself be safe for use. It must be approved and comply with specific regulatory safety requirements.

It is important also that PPE fit comfortably. Oversized overalls or safety shoes that are too tight do not necessarily contribute to safety of employee.

### Tip

Always try on **personal protective equipment** for **size** before you start to use them.

Signify requires Subcontractor to implement following PPE as minimum when working on construction sites and alongside roads:

- safety shoes,
- fluorescent workwear or vest,
- safety glasses,
- hard hat.

Above requirements set the minimum level of protection and may not be sufficient for all circumstances. Task risk analysis and method statements must define additional or modified PPE requirements for specific workplaces and tasks. (e.g. fall arrest equipment).

Subcontractor EHS Officer is responsible to ensure that PPE requirements defined in the Subcontractor EHS Plan are compliant with local regulatory requirements.

## Tip

Specific **requirements and norms** apply to PPE. Do not purchase any PPE yourself, but order them through your employer. **Use and maintain** PPE according to the instructions provided.



## Construction site

- Safety shoes
- Fluorescent workwear or vest
- Safety glasses
- Hard hat

#### What must PPE additionally comply with?

For the proper type of Personal Protective Equipment always refer to the outcomes of a Task Risk Analysis (TRA) and method statement defined for the specific scope of the activities. Additionally, consider specifications outlined below.

Hard hat: Check the validity of the hard hats regularly from date of manufacture. Replace your hard hat in due time, even if it appears to be perfectly ok. Through exposure to light the hard hat material becomes porous and may not withstand the forces initially designed for.

Safety shoes: Wear safety shoes in all construction workplaces with a minimum of protection class S3. Wear ESD approved shoes with antistatic soles in buildings with electronic components operations. Wear shoes that are properly insulated for tasks with electricity.

Reflective workwear: When working along roads the reflective clothing must comply with ISO 20471 class 2 standard. In poor visibility (evening, night, mist, or rain) the reflective clothing must meet class 3 (safety trousers and jacket).

Safety glasses: In the bright sunshine wear safety glasses with UV filters of degree appropriate for the sunshine exposure.

Subcontractor EHS Officer is responsible to ensure safety induction training encompasses proper use of PPE and communication of employee's responsibilities regarding PPE. The content of the safety induction training must be documented in the Subcontractor EHS Plan file.

Subcontractor EHS Officer must ensure PPE requirements are compliant with local regulatory requirements.

## **4.10 Induction and on-the-job training**

Signify requires Subcontractor to implement effective safety training system for Subcontractor employees. The training must ensure the Subcontractor employees are competent to carry out the assigned tasks in a safe manner and to operate safely any tool or equipment associated with completion of the task.

The safety training for the employees shall include:

- Site safety induction, including emergency procedures, employee safety duties, PPE use,
- Task Risk Analysis and method statement training, including on-the-job training
- Training in the use of tools and equipment required for the task
- Specialized training (work at height, hazardous substances handling, asbestos), if applicable.

Subcontractor is required to ensure the content of the induction training includes the right of the Subcontractor employee not to start the assigned task if in doubt of having less than adequate training to ensure a task can be completed safely. STOP-THINK-ACT-REFLECT principle applies in such case.

Subcontractor Supervisors shall additionally be trained on:

- Subcontractor EHS Plan content,
- Conducting workplace EHS inspections,
- Conducting Daily Safety Talk.

Training conducted by the Subcontractor must be carried out in the native language of the Subcontractor employees.

Some countries require basic training certificate for safety in a construction field when conducting work activities at a construction site. The type/level of training will depend on the specific requirements of the particular country where the work activities are executed.

Safety passports might be required in case Subcontractor will conduct the work at site where vast array of Subcontractors will be present at any given time. Safety passport proves that an individual possessing it undergone an internationally recognized standard of health and safety training and assessment.

Signify requires all Subcontractor employees to have valid identification card with them at all times while working on a job site. The documented training records and certificates shall link with the personal data on the identification card.

Subcontractor EHS Officer is responsible to define training requirements of Subcontractor employees engaged in the scope of the contracted activity. Training requirements must be met before a task is assigned to an employee. Meeting training requirements must be proven with certificates and training records. The training requirements, content of the safety training modules, certificates and training records must be documented in the Subcontractor EHS Plan file.

Subcontractor EHS Officer must ensure training requirements comply with local regulatory requirements.

Subcontractor Supervisors are responsible to control the Subcontractor employee training record and capability before a job task is assigned to the employee.

**Tasks must not be assigned to the Subcontractor employees who are not properly trained to execute the task.**

## 4.11 On-site employee safety rules

Every employee has a duty, while at work, to take reasonable care for their own health and safety and of other persons who may be affected by their acts or omissions at work. The duty extends to taking care of the environment they are working in.

Signify recommends Subcontractors to deploy in every project site a set of fundamental life-saving rules. Signify 10 Golden Safety Rules provided in the section 1.1 may serve as reference. Every person who stays on-site must rigorously adhere to the comply with the fundamental life-saving rules.

Additionally the following practical safety rules shall be communicated during safety induction training and shall be sustained during Daily Safety Talks.

### Prior to start

- Report to your supervisor every day when beginning the work. Always ensure you have a valid identification card or badge with you.
- Be aware of the safety rules and evacuation procedures of the site. Ensure you know the person(s) to contact in an emergency, including out-of-hours if you may be working late.
- Make sure to have an easy access to a first aid kit.
- Read through method statements. They describe the measures you must take to work safely.
- Check with your supervisor, if you have adequate training, knowledge and experience for the tasks assigned to you. You have a right not to start the task if lacking the adequate training.
- Make sure you participate in daily safety talk. Be active. Speak up when you are aware of the hazards in your workplace or at the site.
- Always use defined Personal Protective Equipment. And keep them well maintained.
- Prior to use, make sure to visually inspect equipment and tools.
- **Never start hazardous work without valid Work Permit.**
- Prepare to use Lock Out / Tag Out / Try Out (LOTOTO) for the energy shutdowns. Only engage energy systems and machines if you are authorized to do so.



- If you anticipate you will be a lone worker on the site you must make sure to know local procedure concerning lone workers and follow it strictly.

#### During your work

- Use and maintain safety systems correctly. And never change or remove them.
- Comply with the safety rules imposed by customer or other companies working on their premises or under their supervision.
- Do not access areas you are not authorized to.
- Keep access roads to your workplace clean and keep your workplace tidy.
- Never leave machines or equipment to run unnecessarily or unattended.
- Do not make unnecessary noise while working.
- Do not leave heating or lighting on when unnecessary.
- Observe the traffic and road signs. Respect the traffic rules and never exceed the maximum speed. Only park in the places where this is permitted. As pedestrian always give the right of way to the mobile equipment.
- STOP your work immediately if there is a threat of danger. Report hazard to your supervisor. Return to work only when it is safe.
- STOP the work of your colleagues if you see a threat of danger or at-risk behaviors. Inform the area supervisor.
- Limit the amount of waste you produce. Separate the waste and deposit it in the appropriate containers or waste bins. It is never permitted to burn waste.
- Prevent leakages of oil or fuel. Avoid damage and spills to the environment.
- Clean up spilled waste immediately with adequate means. If you spill substances that are hazardous for people or the environment, report this immediately to your supervisor.
- Perform repairs, maintenance, and cleaning work in the designated places.
- At your workplace, only use your mobile phone to report accidents or dangerous situations. Make other calls in a safe environment, preferably in the break room.
- If there is no smoking policy, obey it. Smoke only in designated places.
- It is STRICTLY FORBIDDEN to work under the influence of alcohol or drugs. Non-compliance will lead to immediate dismissal from site.
- Always wash your hands thoroughly before eating, drinking, or smoking and do not eat, drink, or smoke in any work area.
- Keep break rooms, restaurants, and toilets clean.
- If emergency alarm is activated proceed in an orderly manner to an assembly point. Remain there until the further instructions are given.
- Report to your supervisor all accidents and near misses no matter how trivial they appear to be.

#### After work is completed

- Always clean up your workplace. Put equipment and tools away in the storage place. Secure them from any accidental damage.
- Reflect on any hazardous situations you faced during your work. Inform supervisor and discuss ideas how to prevent them.
- Report to your supervisor that you are leaving the workplace.



### **Not yet 18?**

Then stricter rules at work apply to you. You are not permitted to perform certain tasks. Consult your supervisor for rules applicable for you and additional break time you are entitled to.

## 4.12 Daily Safety Talks

Regular safety talk (or Toolbox meeting) builds strong injury prevention engagement of the participants and in consequence reduces likelihood of safety accidents occurring on a site premises. A safety talk is a short maximum 10-minute, face to face, meeting conducted at the beginning of the shift in a workplace where employees and/or subcontractor employees do their work. The location for the talk should be comfortable enough for the participants, preferably with limited background noise to enable the discussion can flow freely.

A daily safety talk is usually focused on a few topics, including the following items:

- recognition to the participants for doing work safely, engaging employees to work safer,
- promoting Site Safety Rules,
- dialogue on identified workplace hazards and at-risk behaviors.
- addressing specific injury hazards (e.g. work at height, traffic safety, electrical safety, ...),
- communication about injuries and their root causes.

Employees shall be encouraged to be proactive in the meeting. The success of a meeting is strongly dependent on the engagement of the participants.

Signify require Subcontractor EHS Officer and Subcontractor Supervisors to conduct Daily Safety Talks. Subcontractor EHS Officer must define Daily Safety Talk structure as part of the Subcontractor EHS Plan and document it in the Subcontractor EHS Plan file.

## 4.13 Visitors

Subcontractor EHS Officer is required prepare visitor safety procedure as the part of the Subcontractor EHS Plan. The procedure shall include:

- Reporting and reception at Subcontractor Supervisor,
- Safety induction,
- Ensuring use of required PPE,
- Registering presence of visitors, they entry and exit from the site.

All visitors must always comply with the site safety rules and be during their visit accompanied by the Subcontractor Supervisor until they leave the site.

It is good practice to provide a small leaflet with safety rules and emergency information.

## 4.14 Strict enforcement rules

Everyone wants to return home safely at the end of the workday. Reason enough to relentlessly strive for a safe working environment and for strong injury prevention culture at the job site.

The success or failure in substantial extent depends on the appropriate attitude and behavior. If someone does not observe the safety rules a verbal warning shall be given ultimately followed up with formal disciplinary action in case sustainable improvement is not observed.

### Opening the dialogue on safety...

Everyone can miss something or make a mistake. Therefore, it is important people present at the job site watch out for each other and address respectfully at-risk behaviors. This applies to everyone: to managers, supervisors, employees, visitors, other contractors. If we open up a constructive dialogue on safety, we will together create a safer working environment.

Signify assumes that Subcontractor employees commit to perform their work safely. And that this commitment is very strong not only for own safety, but also safety of the co-workers. If any co-worker behaves at-risk, address him/her about this. Stepping in the dialogue about safe and at-risk behaviors improves safety of everyone in the workplace.

#### Warning and disciplinary procedure

Signify requires Subcontractor to set up a warning and disciplinary procedure as the part of Subcontractor EHS Plan. Any individual not complying with safety requirements as outlined in the Subcontractor H&S Plan and method statements shall be subjected to disciplinary action. Depending on the nature and repeatability of the safety violation, it is recommended disciplinary actions may be deployed the following levels:

- verbal warning,
- written warning,
- employment termination.

#### Deliberately dangerous working practice

If an individual deliberately endanger themselves or co-workers, this individual does not belong to Signify partners. We want to offer a safe workplace and dangerous behavior has no place here. If this is the proven case, the individual will be banned from the workplace Signify is responsible for and Subcontractor company will be asked for the termination of the employment contract. In worst case it might also endanger the service contract Signify has with the Subcontractor. It is contractually agreed that the cost incurred for any loss in the contracted project or service due to at-risk act of a Subcontractor employee (including any business interruption costs) will be charged to the Subcontractor.

The above procedure also applies if an individual:

- repeatedly ignore received warnings,
- use alcohol and/or drugs on job site or is under the influence of them,
- fights or show aggressive behavior,
- is part of horseplay event,
- is guilty of stealing.

Subcontractor EHS Officer is responsible to ensure disciplinary procedure is part of Subcontractor EHS Plan and it is communicated to Subcontractor employees during the safety induction training. PPE. The content of the safety induction training must be documented in the Subcontractor EHS Plan file.

Subcontractor EHS Officer must ensure disciplinary procedure is compliant with local regulatory labor law requirements.

## 5. Case based continuous improvement process

### 5.1 Near miss and first aid cases

Continually improving based on occurring first aid or near miss cases are essential in zero injury job site strategy. In this type of cases hazard that has existed in the workplace materialized but due to “a luck” there was limited (first aid treatment) or no impact (near miss) on human health.

Investigation of the root causes enable to capture residual risks in the workplace that were not eliminated by implemented injury prevention defense lines. Understanding of the residual risks allows to close the gaps and further strengthen existing defense lines.

Signify requires reporting and registration system for first aid cases and near misses to be part of Subcontractor EHS Plan. Reporting and registration system must be set up in native language of Subcontractor employees with no difficulty to report a first aid or a near miss case.

Subcontractor EHS Officer must on daily basis analyze reported cases, ensuring investigation unveils the gaps in the injury prevention defense lines. Addressed countermeasure actions shall be documented. Subcontractor Management is expected to resource and control execution of defined countermeasures to sustainably eliminate identified injury prevention defense lines from the workplace.

Subcontractor EHS Officer is required to report during weekly Project Safety Review meetings led by Signify Project Manager the following information:

- number of registered first aid cases,
- number of registered near miss cases,
- number of defined countermeasure actions,
- countermeasure actions completion percentage.

In case first aid or near miss cases in their nature are characterized with serious injury or fatality potential this must be reported to the Signify Project Manager who will initiate Safety Alert process within Signify.

### 5.2 Injury and illness cases

Every recordable occupational injury and illness case occurring to the Subcontractor employee or any other person affected by the activity of the Subcontractor in the job site must be internally reported and registered.

Recordable occupational injury and illness cases include:

- fatalities,
- severe injury and severe illnesses,
- lost workday cases,
- restricted work cases,
- medical treatment cases,
- occupational illness cases.

Signify requires reporting and registration system for recordable occupational injury and illness cases to be part of Subcontractor EHS Plan. Subcontractor employees shall be made aware to report any injury or illness immediately to their Supervisor. Reporting and registration system must be set up in native language of Subcontractor employees with no difficulty to report an injury or an illness case.

Subcontractor EHS Officer **reports immediately fatalities or severe cases** to Signify Project Manager.

The remaining recordable cases are reported by Subcontractor EHS Officer during weekly Project Safety Review meetings led by Signify Project Manager.

Each recordable case must be investigated by Subcontractor EHS Officer. Investigation process must ensure that injury prevention defense lines gaps are established and adequate countermeasure actions are addressed to effectively eliminate the gaps. The investigation process must be documented in the investigation report.

Fatality and severe cases are followed in Signify with Safety Alert. Safety Alert provides structured and standardized information about the case circumstances, root causes for defense lines failures and addressed countermeasure actions. Subcontractor EHS Officer is required to co-operate with Signify Project Manager and Signify EHS Officers to prepare high quality, reliable Safety Alert. In this process, openness and non-blaming culture are the key success factors. Essential is to focus on what happened and not on where or to whom happened.

Subcontractor Management is expected to resource and control execution of defined countermeasures to sustainably eliminate identified injury prevention defense lines from the workplace.

Country regulations may impose specific requirements for injury and illness case reporting process, including notification of the local authorities. Subcontractor EHS Officer is responsible to ensure country regulatory compliance is met. If regulatory requirements are stricter than requirements stated in this document, the regulatory requirements prevail.

Template of the investigation report as well as every completed investigation report must be included in the Subcontractor EHS Plan file.

Subcontractor EHS Officer is required to report during weekly Project Safety Review meetings led by Signify Project Manager the following information:

- number of registered recordable cases,
- status of investigations,
- number of defined countermeasure actions,
- countermeasure actions completion percentage.

## Tip

You have not seen a project emergency information yet?

**Request this immediately** through your Supervisor.

So, you know what to do and who to approach in the emergency event.

## 5.3 Environmental impact cases

Contractor shall inform Signify of any environmental impact incidents which have occurred on the job site. Environmental incidents may occur in many forms:

- leakage of the chemical substance,
- spill of the chemical substance,
- damage to flora or fauna,
- polluted emission to the air (gas leaks),
- soil contamination,
- water contamination,
- waste disposal issues.

Signify requires reporting and registration system for environmental impact incidents to be part of Subcontractor EHS Plan. Subcontractor employees shall be made aware to report any incident immediately to their Supervisor, who shall inform Subcontractor EHS Officer. Reporting and registration system must be set up in native language of Subcontractor employees with no difficulty to report a case.

Subcontractor EHS Officer and Subcontractor supervisors have joint responsibility to:

- secure health & safety of the persons in the vicinity of the environmental incident,
- limit further damage to the environment.

Environmental impact case must be investigated by Subcontractor EHS Officer. Investigation process must ensure that root causes of the case are established and adequate countermeasure actions are addressed to effectively eliminate the root causes. The investigation process must be documented in the investigation report.

Subcontractor Management is expected to resource and control execution of defined countermeasures to sustainably eliminate root causes of the environmental impact incident from the workplace.

Country regulations may impose specific requirements for environmental impact reporting process, including notification of the local authorities. Subcontractor EHS Officer is responsible to ensure country regulatory compliance is met. If regulatory requirements are stricter than requirements stated in this document, the regulatory requirements prevail.

Template of the investigation report as well as every completed investigation report for environmental case must be included in the Subcontractor EHS Plan file.

Subcontractor EHS Officer is required to report during weekly Project Safety Review meetings led by Signify Project Manager the following information:

- number of registered environmental impact cases,
- status of investigations,
- number of defined countermeasure actions,
- countermeasure actions completion percentage.

## 5.4 Project safety review meetings

Signify will monitor EHS performance of Subcontractor. Subcontractor is ensured that all related information will be shared only internally in Signify.

Signify Project Manager will install and chair Project Safety Review meetings on weekly basis to analyze and discuss EHS performance with Subcontractor EHS Officer. The agenda of the review meeting will be standardized with Terms of Reference that Signify Project Manager will share with Subcontractor EHS Officer.



On top of information related with the safety and environmental cases (sections 5.1 – 5.3), Subcontractor EHS Officer is required to provide:

- number of conducted daily safety talks,
- number of conducted workplace inspections,
- **information on the proposed changes to agreed Subcontractor EHS Plan.**

As the result of the analysis and discussion Signify Project Manager may impose an improvement action to be executed by the Subcontractor. Subcontractor EHS Officer and Subcontractor Management are expected to resource and control execution of such action at the Subcontractor side. At the same time improvement action to be executed by Signify might be defined. Signify Project Manager will resource and control execution of the action by Signify.

**Subcontractor is not permitted to implement any change to the agreed Subcontractor EHS Plan without formal approval from Signify Project Manager.**

Signify will also regularly (planned and random) conduct site inspections to verify Subcontractor adherence to contractually agreed EHS requirements. Signify representatives may stop work if unsafe practice is observed. Doing so, Signify will not accept responsibility for any increase in cost arising out of such an action.

In certain extreme non-compliance situations Signify Project Manager and Signify Procurement Manager may start contractually agreed penalty procedure.

Signify Project manager will document Project Safety Review with minutes and will archive them in Signify Project EHS Plan file.

## **5.5 Signify EHS audits**

The Subcontractor is expected to accept that during work execution Signify's representatives may perform on-site EHS audits in order to verify the compliance of the work with the Subcontractor EHS Plan and other relevant regulations. The Subcontractor EHS Officer and Subcontractor Supervisors shall cooperate during such audits. These audits are focusing on injury and illness prevention, including environmental preventive measures, and overall compliance with the requirements specified in the locally relevant laws.

Signify is entitled to impose the following, but not limited to, sanctions for events of noncompliance identified and documented during the on-site audits, subject to the weight of the given event of non-compliance:

- to call upon for supplementing the missing documentation,
- to order extraordinary EHS training,
- to cancel/withdraw the permit to work,
- to impose a EHS penalty,
- to take disciplinary action towards an Subcontractor employee(s),
- to ban the Subcontractor's employee(s) from entry into Site for a definite period,
- to terminate the Subcontract or Purchase Order(s), totally or partially, with immediate effect.

Sanctions related with deficiencies and violations identified during on-site EHS audits or in the accident investigations and provisions for their application are specified in Schedule I to the Annex IV.



## 6. Other information and contact

If there is any doubt or misunderstanding of the Signify EHS code of practice then the Subcontractor must bring this to the attention of the Signify Project Manager. Further advice will be obtained from the Signify Project Manager after consultation with representative of Signify Regional/Global EHS Community of Experts.

Signify EHS system is certified against ISO 45001:2018 and ISO 14001 :2015 standards.

Do you have suggestions for improvements?

**Let us know!**

Send an email to:

Americas: [andrew.mckenzie@signify.com](mailto:andrew.mckenzie@signify.com)

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