

Technical Standard – Occupational Health Management

Vedanta Resources Plc

Sustainability Governance System


Technical Standard

Occupational Health Management

Technical Standard – Occupational Health Management

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1. INTRODUCTION

The purpose of this Technical Standard is to ensure that Vedanta effectively manages the occupational health of the global workforce and contractors and to build a positive health and safety culture through effective management systems. This Standard supports Vedanta's *HSE Policy*.

2. SCOPE

This Technical Standard is mandatory and applies to all Vedanta subsidiaries, operations and managed sites, including new acquisitions, corporate offices and research facilities and to all new and existing employees and contractor employees. This Standard is applicable to the entire operation lifecycle (including exploration and planning, evaluation, operation and closure).

3. DEFINITIONS

Definitions of key terms used in this document are shown in the following table.

Term	Definition
Affected Communities	Local communities directly affected by the new or existing project.
ALARP (As Low as Reasonably Practicable)	Consideration of the risk against the benefits or non-benefits that are needed to implement measures/controls to avoid the risk – where the cost (not just financial) of implementation of the measures is disproportionate to the benefits, it is not considered to be reasonably practicable.
Competent Person	An individual who has the necessary knowledge, skills and experience to complete their responsibilities safely, effectively and consistently.
Continual Improvement	A recurring process of enhancing the health governance system in order to achieve improvements in overall health performance consistent with Vedanta Mission, Values and Code of Conduct.
Contractor	Any third party organization which is engaged or commissioned by Vedanta to undertake work or provide services.
Contractor employee	An employee of a contracted company engaged or commissioned by Vedanta to undertake work or provide services, but who are not directly employed by Vedanta. For example, contractor employees working on Vedanta operations, persons working for Vedanta through staff/employment agencies, contract cleaners etc.
Employee	An individual who is engaged to work directly for Vedanta on either a part-time (including hourly paid) or full-time basis and for a fixed period or on permanent basis and is salaried. By virtue of the individual's contract of employment, the employee is obliged to adhere to Vedanta's terms and conditions of employment (specific to Group or the subsidiary employing the individual), and is protected by national (where it exists) and international laws

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Term	Definition
	concerning labour and working conditions.
Ergonomic Factors	Include repetitive motion, overexertion, and manual handling. Injuries or ill-health associated with ergonomic factors take prolonged and repeated exposures to develop, and typically require periods of weeks to months for recovery.
Hazardous Materials	Materials that represent a hazard due to their physical or chemical characteristics.
Hazard	A situation which has the potential to cause harm to people, equipment or the environment.
Health Surveillance	The systematic and regular medical assessments of a person's health to detect for the early signs of potential exposure.
ICMM (International Council on Mining and Metals)	The International Council on Mining and Metals (ICMM) was established in 2001 and seeks to drive performance improvement through its members which comprise 20 mining and metals companies, as well as 30 national and regional mining associations and global commodity associations.
IFC (International Finance Corporation)	Member of the World Bank that finances and provides advice to private sector ventures and projects in developing countries.
ISO (International Standards Organization)	A non-governmental organization that sets voluntary standards at an international level covering a variety of industry sectors.
Manual Handling	Any transporting or supporting of a load (including the lifting, putting down, pushing, pulling, carrying or moving thereof) by hand or bodily force.
Noise Induced Hearing Loss or Damage	The temporary or permanent loss of hearing due to exposure to noise. Other conditions resulting from exposure to noise are also included (such as tinnitus).
Occupational Exposure Limit	A concentration of a substance hazardous to health to which most workers can be exposed repeatedly (8 hours/day, 40 hrs/week) without sustaining adverse health effects.
Occupational Illness	Any illness, disability or other physical/mental problem caused or made worse by current or past work.
Operation(s)	A location or activity that is operated by a Vedanta Company and is part of the Vedanta Group. Locations could include mines, refineries, ports or transportation activities, wind farms, oil and gas development sites, offices including corporate head offices, and research and development facilities.
Risk	Combination of probability or frequency of certain hazardous occurrences and severity of impacts resulting from an occurrence.

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Term	Definition
Vector Borne Disease	A disease that is transmitted between hosts by a vector organism such as mosquitoes that carry malaria and dengue fever.
Vedanta Company	A subsidiary of Vedanta Group either fully or majority owned that has its own management structure (e.g. Hindustan Zinc Limited, Vedanta Aluminium Limited, Sterlite Industries limited, etc.)
Young Person	A person below the age of 18 years. Whilst Vedanta does not typically or routinely employ or contract persons under the age of 18 years, there may be occasions when they are appointed, for example as part of an apprenticeship or work experience placement. Young persons below the age of 16 years are not permitted in any Vedanta workplace.

4. PROGRAMME REQUIREMENTS

This Technical Standard aims to outline the requirements in order to avoid (or if not possible), minimise, the adverse impact of Vedanta operations on the occupational health of its workforce. The requirements described below shall be followed by all Vedanta subsidiary companies and operations with regards to safety management

4.1. General Requirements

- a) Occupational health management programmes shall meet the requirements of the *IFC Performance Standards, the IFC EHS General Guidelines and the IFC Sector Guidelines*. These requirements are summarized as follows:
- *Performance Standard 2 – Labour and Working Conditions*. This includes the requirement for the protection for basic rights of workers, treating the workforce fairly and providing them with safe and healthy working conditions.
 - *IFC EHS Guidelines* - the EHS Guidelines contain the performance levels and measures that are normally acceptable and applicable to projects or operations. Vedanta operations are expected to refer to these Guidelines (or other internationally recognized sources, as appropriate) when identifying hazards and risks associated with new projects or general operations. Applying the EHS Guidelines for existing operational activities may involve the establishment of operation-specific targets and a timetable for achieving the Guideline requirements. The applicability of the EHS Guidelines will be tailored to the nature and scale of the hazards and risks presented by the Vedanta operation.
 - *IFC Sector Guidelines* - these Guidelines provide the performance levels and measures that are normally acceptable and applicable to projects or operations in specific industry sectors. Industry sector guidelines that may apply to Vedanta operations include mining, base metal smelting and refining, and wind energy.

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4.2. Occupational Health Management System

- a) Every Vedanta Operation shall establish and maintain a health management system that minimizes, as low as is reasonably practicable, the hazards and risks to employees and third parties. The management system shall include the following methodology:
- ‘Plan’ – establish objectives and processes required, specifically to identify and manage the risk of exposure to occupational illness and to exceedance of any applicable Occupational Exposure Limits (see also the requirements of the Vedanta Management Standard on *Leadership, Responsibilities and Resources*);
 - ‘Do’ – implement the processes that are designed minimise exposure to the risks identified in order to prevent the occurrence of Occupational Illness;
 - ‘Check’ – measure and monitor the processes and report results against the objectives;
 - ‘Act’ – take action to improve performance of the management system based on results, and
 - Adopt a continual improvement process.
- b) Operations shall aim to reduce the number of ill-health related incidents to a rate of zero.
- c) Operations shall ensure there is a system in place for reporting, investigating and communicating lessons learnt from health-related accidents/incidents.
- d) Operations shall implement all reasonable precautions to protect the health of employees and third parties and introduce preventative and protective measures according to the following order of priority:
- Hazard elimination by removing the activity from the work process;
 - Hazard control at the source through the use of engineering control mechanism;
 - Hazard minimization through the design of safe systems of work, and administered control measures; and
 - Provision of appropriate Personal Protective Equipment (PPE) in conjunction with training, use and continual maintenance of the personal protective equipment.
- e) Operations shall seek to obtain, and maintain, external certification through a third party of the health management system to the internationally-recognized Health and Safety management system standard OHSAS 18001. The management system will form part of Vedanta’s risk management strategy to address changing legislation and protect the workforce.
- f) Operations shall ensure the risks and impacts to the health and safety of Affected Communities prior to and during the lifecycle of the project/operation and addressing the identified risks and impacts in a manner proportionate with their nature and size.
- g) Operations shall avoid and minimise the potential for community exposure to hazardous situations that may result from on-site project/operation activities.

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- h) Operations shall ensure all occupational health and safety practices and procedures comply with the *Vedanta HSE Policy, Leadership, Responsibilities and Resources Management Standard and the Emergency and Crisis Management Technical Standard*.
- i) Medical records (such as those arising from health monitoring and surveillance) shall be kept in a secure and confidential manner and shall be retained for a minimum of 40 years. Disclosure of medical information is made in accordance with internationally accepted medical protocol.

4.3. Occupational Health Risk Assessment

- a) Each Vedanta Company shall undertake an occupational Health Risk Assessment (HRA) to systematically and proactively identify health hazards in the workplace, assess their potential health effects, measure exposures and characterize the risks, and determine appropriate control measures to protect the health and wellbeing of those who may be affected.
- b) Where a significant risk is identified, a quantitative assessment shall be conducted which shall include personal exposure monitoring to determine the employee exposure in relation to occupational exposure limits (OELs) as defined by relevant national legislation or by international standards, where OELs are absent in national legislation.
- c) The health risk assessment shall consist of a medical examination and testing and functional capacity assessment.
- d) The purpose of all the examinations described above is to determine whether the person being assessed is fit for the position. Following completion of the health assessment the examining medical officer shall complete a Fitness for Work Certificate. Should the individual be unfit for the role, or fit with restrictions, action shall be taken as appropriate.
- e) All significant exposures shall be managed in accordance with the provisions described in Section 4.2 (*Occupational Health Management System*).
- f) The occupational HRA shall be conducted in accordance with national or regional legal requirements and shall be aligned to the international best practice guidance issued by the ICMM (*Good Practice Guidance on Occupational Risk Assessment*).
- g) The occupational HRA is a living document and it shall be reviewed on a regular basis as well as following any accident, incident or changes in processes, tasks or workplace areas.

4.4. Workplace Exposure Monitoring

- a) The working environment shall be monitored for occupational hazards relevant to the specific activities.
- b) Employees exposed to health risks shall be monitored in accordance with relevant legislation or against the IFC EHS General Guideline OELs, whichever is the more stringent.
- c) The sampling and monitoring programme shall be designed and implemented by accredited professionals (such as an occupational hygienist or physician) as part of an occupational health and safety monitoring programme with recognition for acute and chronic health concerns.

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- d) All exposures to health risks in exceedance of relevant legal limits or those referenced in (b) shall be reported to the regulatory authorities (if and as required) and in all cases to the Group Manager responsible for Health and Safety.

4.5. Occupational Health Surveillance

- a) A health surveillance programme shall be implemented to monitor the health condition of all exposed employees both prior to employment, periodically as required on the basis of the HRA and key functional requirements of the individual's role, and upon termination of employment.
- b) Data collected from the health surveillance programme shall facilitate appropriate management decisions to be made through the application of evidence based effective control measures.
- c) Individual data obtained during a health assessment shall be used to facilitate occupational rehabilitation and shall be used in a confidential manner to reinforce specific preventive measures and safe work practices.
- d) Medical examinations shall be conducted by a registered medical officer who shall be either the person's own doctor or who is provided by the Operation. In the case of the person being examined by their own doctor, additional testing may be required by a medical officer approved by the Company to validate the results. Any necessary additional medical testing shall be conducted by a medical specialist approved by the Company as required.
- e) The frequency of the health surveillance shall be based on consideration of the level of health risk, the speed of progression of any potential illness and the requirements of regulatory obligations.

4.6. Noise and Vibration

- a) Every Vedanta facility shall assess the risk of exposure to noise and vibration levels in the workplace and shall implement controls to manage and mitigate this risk in order to protect against the risk of noise induced hearing loss or damage
- b) No employee shall be exposed to a noise level, a peak sound pressure level (instantaneous) or vibration levels greater than those levels specified by national legislation or by IFC EHS Guidelines, where such standards are more stringent than national legislation.
- c) Exposure to elevated noise and / or vibration levels shall be managed through a hierarchical approach comprising:
 - i) Implementation of engineering control measures including the use of acoustic insulating materials and isolation of the noise source, where feasible.
 - ii) Selection of tools and equipment that have been designed to meet current and internationally-recognized standards and guidelines for noise and vibration control.
 - iii) Establishment of systems of work that minimise the use of all tools and equipment that emit elevated levels of noise and vibration.

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- iv) Implementation of planned maintenance programmes that reduce unnecessary noise and vibrations;
 - v) Task and shift design incorporating rest and stretch breaks in work processes, and job rotation;
 - vi) Keeping the number of employees exposed, or likely to become exposed, to a minimum;
 - vii) Provision of personal protective equipment for noise and vibration, where feasible, and
 - viii) Provision of visible information, instruction and training in an easily understood language regarding noise and vibration risks and control measures.
- d) The use of personal hearing protection shall be enforced actively when the equivalent sound level over 8 hours reaches the specified upper action limit, or when the average maximum sound level reaches the level, as specified by national legislation or by international standards, where such standards are more stringent in national legislation.
- e) Hearing protective devices shall be designed to international standards and shall be capable of reducing sound levels at the ear to at least 80 dB(A).

4.7. Hazardous Substances

- a) Every Vedanta facility shall assess the risk of exposure to substances hazardous to health and shall implement controls to manage and mitigate this risk. This assessment shall consider the principle pathways of exposure including inhalation (of particulates, gas and vapour), absorption and ingestion.
- b) Vedanta Companies shall establish measures to minimise exposure to employees and contractors to as low as is reasonably practicable (ALARP), and to ensure that all personnel are protected from any adverse health effects from these hazardous substances.
- c) The use of substances hazardous to health shall be eliminated wherever possible and any internationally banned substances shall not be used under any circumstances. Where elimination is not currently feasible the facility shall have in place a documented phase-out plan.
- d) Exposure to substances hazardous to health shall be managed through a hierarchical approach comprising:
 - i) Replacement of the hazardous substance with a less hazardous substitute;
 - ii) Implementation of engineering and administrative control measures to avoid or minimize the release of hazardous substances into the work environment keeping the level of exposure below internationally established or recognized limits;
 - iii) Keeping the number of employees exposed, or likely to become exposed, to a minimum;
 - iv) Communication of chemical hazards to workers through labelling and marking according to national and internationally recognized requirements and standards,

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- including the International Chemical Safety Cards (ICSC), Materials Safety Data Sheets (MSDS), or equivalent;
- v) Any means of written communication should be in an easily understood language and be readily available to exposed workers and first-aid personnel, and
 - vi) Training workers in the use of the available information (such as MSDSs), safe work practices, and appropriate use of PPE.
- e) Working areas shall be provided, as low as is reasonably practicable, with adequate ventilation and dust / fume extraction systems to ensure that inhalation exposure levels for potentially corrosive, oxidizing, reactive or siliceous substances are maintained and managed to relevant ensure OELs can be met.
 - f) Where mechanical air extraction or local exhaust ventilation systems are provided they shall be appropriately selected, fitted and maintained in good working order.
 - g) Emergency and first aid provision e.g. eye wash and emergency shower systems shall be provided in areas where there exists the possibility of chemical contamination or exposure of workers and the need for rapid treatment.
 - h) Material Safety Data Sheets (MSDS) shall be available for all hazardous materials held on site.
 - i) Personal respiratory protection equipment shall be provided, and its use enforced in all work areas where all other options for eliminating or reducing the risk of exposure have been considered in order to protect exposed personnel against a significant risk of exposure.
 - j) Respiratory protective equipment shall be designed to the International Standards issued by the International Standards Organization, the European standards, or alternative equivalent.

4.8. Asbestos Containing Materials

- a) Asbestos containing materials (ACMs) shall not be used in new buildings or as a material in refurbishment or renovation of existing buildings and infrastructure.
- b) Existing facilities with ACMs shall develop an asbestos management plan which clearly identifies the locations where ACMs are present, its condition; control of access, and any other work that may be required to manage and monitor it.
- c) The plan shall be made available to all persons involved in operations and maintenance activities.
- d) Repair or removal and disposal of existing ACMs in buildings should only be performed by personnel licensed to the standard imposed by the UK HSE and/or the US OSHA, whichever is the more stringent and more relevant to the nature of the work required.
- e) The emergency response plan prepared for the Operation shall include arrangements for dealing with accidental exposure to ACMs.
- f) Operations shall ensure that where ACMs are present, all staff that can potentially come into contact with ACMs are trained to understand the risks of exposure to ACMs, to prevent such

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exposure, to avoid damage and to be familiar with the emergency procedure to be followed in the event of exposure.

4.9. Ergonomics, Repetitive Motion, Manual Handling

- a) Every Vedanta facility shall assess the risk of injury or ill-health associated with ergonomic factors, repetitive motion and manual handling in the workplace and shall implement controls to manage and mitigate this risk.
- b) Exposure to substances hazardous to health shall be managed through a hierarchical approach comprising:
 - i) Implementation of engineering control measures including provision of manual handling aids, adjustable work stations to avoid or minimize ergonomic issues, and the need for repetitive motion and manual handling in the carrying out of tasks and activities;
 - ii) Selection and design of tools that reduce force requirements and holding times, and improve postures;
 - iii) Consideration where feasible of special conditions such as left handed persons;
 - iv) Implementation of planned maintenance programmes that reduce unnecessary forces and exertions;
 - v) Task and shift design incorporating rest and stretch breaks in work processes, and job rotation;
 - vi) Multi-person lifts in the absence of suitable mechanical aids;
 - vii) Keeping the number of employees exposed, or likely to become exposed, to a minimum, and
 - viii) Provision of information, instruction and training in an easily understood language regarding safe manual handling techniques, safe work practices, and appropriate use of PPE.

4.10. Ionising and Non-Ionising Radiation

- a) Operations shall identify, assess and minimise the hazards and risks of exposure to ionising and non-ionising radiation.
- b) Operations shall establish and maintain control measures to avoid or reduce the exposure to radiation. The control measures should be operated in accordance with recognized international safety standards and guidelines.
- c) Every Vedanta facility shall establish a radiation dosimetry monitoring programme for all employees potentially exposed to natural or artificial sources of ionising radiation.
- d) Emergency arrangements shall be implemented and maintained to ensure an appropriate response to an incident of over-exposure to a source of ionising radiation.

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- e) Arrangements for the protection of employees exposed to sources of non-ionising radiation shall be established and maintained and shall include provision of suitable protective clothing; management of work-rest regimes to control exposure; education and awareness campaigns.
- f) Personnel shall be provided with information, instruction and training in an easily understood language regarding risks and control measures associated with sources of ionising and non-radiation.

4.11. Thermal Stress

- a) Every Vedanta Operation shall assess the risk of exposure to thermal stress and shall implement controls to manage and mitigate this risk.
- b) The following exposure controls shall be implemented to protect personnel working in hot/cold temperatures:
 - i) Acclimatisation of personnel arriving from cooler/warmer climates;
 - ii) Use of mechanical aids to reduce the physical workload (hot climates);
 - iii) Unlimited provision of potable drinking water;
 - iv) Means of heating food / water when working in cold temperatures and of keeping food/water cool when working in hot temperatures;
 - v) Monitoring weather forecasts for outdoor work to provide advance warning of extreme weather and scheduling work accordingly;
 - vi) Appropriate design of work-rest regime to allow for sufficient rest breaks particularly when undertaking physical and strenuous work;
 - vii) Provision of a cool / warm and sheltered shaded rest environment, and
 - viii) Selection of work attire and personal protective equipment suitable for the work environment;
- c) Provision of information, instruction and training to maintain awareness of the risks, early warning signs and symptoms, and the emergency measures to be taken.

4.12. Fitness for Work

- a) Operations shall conduct a risk assessment to identify its safety critical roles and shall implement a programme to manage the fitness for work of those personnel involved in these roles. Special consideration shall be given to shift and night workers; and those engaged in physical or strenuous work; or machine-paced, complex or monotonous work.
- b) Operations that operate a night shift shall ensure that the shift pattern is appropriately designed to manage fatigue and other sources of ill-health exposure and that the shift system regularly reviewed.

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- c) Every Vedanta Company shall establish and maintain an alcohol and other drugs policy and management programme which shall include periodic testing to be applied as appropriate across its operations on the basis of an assessment of risk.
- d) Operations shall establish a healthier life-style promotion programme such that workers can maintain a level of health and fitness that reduces the incidence of fatigue and facilitates individual fitness for work.
- e) Personnel shall be provided with information, instruction and training in an easily understood language regarding risks and control measures associated with fitness for work.
- f) A pre-placement medical assessment shall be conducted on all new employees/new starters that is appropriate to the role for which they are being recruited and periodic surveillance shall be performed on the basis of the assessment of risk associated with that role.
- g) A post-employment medical assessment shall be conducted on all employees.

4.13. Travel and Remote Site Health

- a) To minimise risk from health impacts associated with frequent travel to and extended stays in remote sites the following mitigation measures shall be established:
 - i) Integrated management programmes and controls to prevent both chronic and acute illnesses through appropriate sanitation, vector borne disease, and protection against harmful flora and fauna;
 - ii) Management of risks associated with operating at altitude;
 - iii) Design, management and maintenance of facilities and practices for food preparation, storage and disposal to minimize risk of illness;
 - iv) Sourcing of food products from reliable suppliers which meet international standards for food safety, sanitation and hygiene so as to ensure that food provided by Vedanta Operations is free from harmful contaminants;
 - v) Procedures to ensure that the production, transportation, storage and preparation of food is carried out in hygienic conditions without risk;
 - vi) Arrangements to provide healthier foods as part of a broader health and wellbeing programme;
 - vii) Personnel shall be provided with information, instruction and training in an easily understood language regarding risks and control measures associated with travel and remote site health, and
 - viii) Persons travelling to foreign countries shall conduct a risk assessment and be supplied with the recommended vaccinations to prevent contraction of illness local the point of destination.

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4.14. Young Persons at Work

- a) Operations shall establish and maintain arrangements for the protection of the health of young persons at work.
- b) The arrangements referred to in (a) shall include an appropriate health risk assessment as well as regular monitoring of the young person's health, working conditions, and hours of work.
- c) Young persons shall not be permitted to work in a hazardous or unhealthy work environment or under difficult conditions such as long hours or night shift work.
- d) Young persons shall be provided with at least one key point of contact that will be responsible for their health and safety on a day to day basis, and shall receive information, instruction and training pertaining to their work activities, and the health and safety hazards, risks and controls in the workplace.

4.15. New and Expectant Mothers

- a) Operations shall establish and maintain arrangements for the protection of women of child-bearing age where the work is of a kind which could involve risk to the health and safety of a new or expectant mother, or to that of her baby.
- b) An employee shall notify local Vedanta management in writing that she is pregnant, has given birth within the previous six months, or is breastfeeding.
- c) The arrangements referred to in (a) shall include an appropriate and specific health risk assessment as well as regular monitoring of the person's health, working conditions, and hours of work.

4.16. General Workplace Health and Welfare Provisions

- a) The temperature in work areas, rest rooms and other welfare facilities shall during working hours be maintained at a level appropriate for the purpose of the facility.
- b) Where there is potential for exposure to substances poisonous by ingestion, suitable arrangements shall be made for provision of clean eating areas where workers are not exposed to the hazardous or noxious substances.
- c) Sufficient fresh air shall be supplied for indoor and confined work spaces. Factors to be considered in ventilation design include physical activity, substances in use, and process-related emissions. Air distribution systems shall be designed so as not to expose workers to draughts.
- d) Heating, ventilation and air conditioning (HVAC) and industrial evaporative cooling systems shall be equipped, maintained and operated so as to prevent growth and spreading of disease agents (e.g. Legionella pneumophila) or breeding of disease vectors (e.g. mosquitoes). Air inlet filters should be kept clean and free of dust microorganisms.

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- e) Lighting levels shall be appropriate for the nature of the work being undertaken and shall comply with national or regional legal requirements or the provisions of the IFC General EHS Guidelines – Occupational Health and Safety (Table 2.3.3) whichever is the more stringent.
- f) Adequate lavatory facilities (toilets and washing areas) shall be provided for the number of people expected to work in the facility and allowances made for segregated facilities. Toilet facilities shall be provided with adequate supplies of hot and cold running water, soap, and hand drying devices.
- g) Where workers may be exposed to substances hazardous to health and there is the risk of contamination of the skin, hair or clothing, facilities for showering and changing into and out of work clothes shall be provided along with a laundering service for used work clothes.
- h) Emergency first aid and medical treatment provisions shall include the following provisions:
 - i) Qualified first-aid shall be provided at all times. Appropriately equipped first-aid stations shall be easily accessible throughout the place of work;
 - ii) Eye-wash stations and/or emergency showers shall be provided close to all workstations where immediate flushing with water is the recommended first-aid response;
 - iii) According to the scale of work or the type of activity being carried out, dedicated and appropriately equipped first-aid room(s) shall be provided. First aid stations and rooms shall be equipped with gloves, gowns, and masks for protection against direct contact with blood and other body fluids;
 - iv) Remote sites shall have written emergency procedures in place for dealing with cases of trauma or serious illness up to the point at which patient care can be transferred to an appropriate medical facility, and
 - v) Where more than five hundred workers are employed, a certified Medical Officer shall be provided or as per local regulations.

5. ROLES AND RESPONSIBILITIES

Vedanta Resources, subsidiaries, businesses, operations and sites shall ensure that roles and responsibilities for implementing and complying with this Standard are allocated. Key responsibilities shall be included in job descriptions, procedures and/or other appropriate documentation.

6. COMPLIANCE AND PERFORMANCE

Each Vedanta operation shall ensure it complies with the requirements of this standard. Performance against meeting the requirements of this Standard shall be assessed periodically, documented and, where necessary, reported to Vedanta Group. The assessment of performance shall include setting and reporting on key performance indicators (KPIs) where these have been established at Vedanta Group, Company or local level. The evaluation of performance shall include, as a minimum, confirmation that:

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- A written Health Risk Assessment no more than 24 months old is in place.
- Conformance to internationally published occupational health exposure guidelines;
- Regular inspection and testing of all safety features and hazard control measures;
- Calibration of occupational hygiene monitoring equipment (if owned by Vedanta) or validation of calibrations performed on contractors' equipment;
- Regular review of occupational health risk assessments;
- Occupational health monitoring / surveillance of exposed staff;
- Monitoring of occupational ill-health and disease, and
- Regular monitoring of training activities for employees and visitors.

7. SUPPORTING INFORMATION

Reference	Description
ICMM (International Council of Mining and Metals)	The ICMM has produced and published good practice guidance on a range of health, safety, environment and community issues relating to mining. http://www.icmm.com/library
ICMM Good Practice Guidance on Occupational Health Risk Assessment	This Good Practice Guidance on Occupational Risk Assessment has been developed by ICMM to provide those practitioners with the information and tools they need to assess the health and wellbeing of employees and contractors. http://www.icmm.com/page/14660/
IFC Performance Standards Guidance Notes	The IFC has published Guidance Notes to guide the implementation of the full range of performance standards. These are available on the website. The guidance is currently being updated and draft versions are available however these have not yet been finalised and formally published. http://www.ifc.org/ifcext/sustainability.nsf/Content/PerformanceStandards
IFC General EHS Guidelines - Occupational Health and Safety	The IFC has published General EHS Guidelines which contain information on cross-cutting environmental, health, and safety issues potentially applicable to all industry sectors. They are designed to be used together with the relevant industry sector guideline(s). http://www.ifc.org/ifcext/sustainability.nsf/Content/EHSGuidelines

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8. REVIEW

This Technical Standard shall be periodically audited and reviewed to determine its accuracy and relevance with regard to legislation, education, training and technological changes. In all other circumstances, it shall be reviewed no later than 12 months since the previous review.

9. RELATED DOCUMENTATION

A summary of the references and supporting documents relevant to this document is provided in the following table.

Doc. Ref.	Document name
	Vedanta Code of Conduct
POL 06	HSE Policy
MS 01	Leadership, Responsibilities and Resources
MS 02	Stakeholder Materiality and Risk Management
MS 09	Document and Records Management
TS 10	Safety Management