

STD-SSD-SHE-17

SITE RULES AND REGULATIONS

ISSUE 4





02/07/2025

THIS DOCUMENT IS APPLICABLE TO ALL DEBSWANA OPERATIONS

**SAFETY AND
SUSTAINABLE
DEVELOPMENT
DEPARTMENT**

APPROVAL

The following signatories approve this Site Rules and Regulations for Business Partners

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1. PURPOSE AND OBJECTIVES

In pursuit of its vision of Zero Harm and aim to make a lasting, positive contribution to the communities in which it operates, Debswana is committed to implement the highest standards of safety, health, environmental care and protection, and social performance. Debswana considers Business Partner Business partner's employees as its own and expects similar commitment from all companies that perform work at its operations.

This document provides Business Partners with an overview of Safety, Health, Environment (SHE) and Social Performance (SP) requirements that are required when they carry out work in areas managed by Debswana.

The requirements within this document should not be considered exhaustive and Debswana reserves the right to add, delete or modify conditions where it is considered appropriate.

The purpose of this document is to ensure that:

- Business Partners are aware of the SHE and Social Performance requirements of Debswana over and above legal requirements,
- Business Partners plan for Safety, Health, Environmental, and Social Performance prior to establishing themselves on site, and budget accordingly in their tender or service provision submissions.
- Business Partners have the required resources and competencies to carry out the work safely.

Business Partners are required to study, and take note of, and understand these rules and regulations, price their tenders, framework and work orders accordingly to ensure all costs they may incur related to compliance with the site rules and regulation, are included. Business Partners must take the opportunity during the tendering or initial engagement process to clarify any items.

2. SCOPE

The requirements outlined in this document apply to all Business Partner and sub-contractor that perform work in any area managed by Debswana. This includes the DCC, Jwaneng Mine, Orapa Letlhakane and Damtshaa Mines.

3. DEFINITIONS

- Business Partner: means a group or individual that contracts with a Debswana Operation (or Project) for the delivery of services based on a Scope of Work, at the operation or elsewhere at a site under control of the Operation or Project.

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- Sub-Contractor: means any person or company that has been contracted by a Business Partner.
- Debswana Contract Manager: is a Debswana employee appointed by Debswana to provide guidance and direction on management of Contracts
- Debswana Representative is a Debswana employee appointed by Debswana to manage the contract.
- Senior Business Partner Manager: Senior Business Partner Official providing direction and control of the Business Partner site.
- Site Manager: A Business Partner Official responsible for the day-to-day management, direction and control of the Business Partner site and activities.
- Socially material contracts: Contracts with ability to cause adverse or positive impact in the communities, Debswana business and Business Partner's reputation, including human rights impacts, or significant positive development opportunities. For example, this would include contracted activity which would have a significant workforce on site.
 - Social impacts: this includes core labour rights such as payment of fair wages, provision of decent housing/accommodation, health and safety practices, access to a grievance mechanism, freedom of association and prohibition of forced labour and child labour.
 - Positive development opportunities include skills transfer through the localized business and entrepreneurs to support delivery of the overall contract.

4. RESPONSIBILITIES

- The Debswana Supply Chain Manager must ensure that this document is sent to the Business Partner as part of the enquiry. This document is available on the Debswana website - www.debswana.com
- Before submitting a bid to Debswana, Business Partners must make themselves familiar with the content of this document and ensure that enough resources are provided to implement the requirements.
- The Debswana Representative must review this document with the Business Partner before costing for the works during tendering or before engagement and ensure that the Business Partner understands the requirements.
- Business Partners must ensure that they adhere to the requirements in this document and comply with Botswana legislation.

5. LEADERSHIP COMMITMENT AND MANAGEMENT SYSTEMS

5.1. Leadership Commitment

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5.1.1. Strong and visible leadership from management is key to promote a safety culture. Business Partner Managers are required to provide a leading role towards positive Safety, Health, Environment, and Social Performance by:

- Practicing Visible Felt Leadership.
- Ensuring that SHE issues are discussed on the agenda of every meeting.
- Championing SHE activities such as training, carrying out risk assessments, incident (including social incidents) investigations and safe work award schemes.
- Delivering lasting positive contribution to communities.
- Including SHE and Social Performance statistics and activities in reports to stakeholders.

5.2. SHE Policy

5.2.1. One of the core values of Debswana is to uphold the safety and health of employees, to protect the environment, and make positive contributions to communities in which we operate.

5.2.2. The company therefore commits to:

- Continually improve safety, occupational health, environmental and social performance.
- Comply with all applicable laws, regulations and other commitments.
- Prevent work-related diseases, injuries and damages to property.
- Prevent pollution of the environment.
- Conserve natural and other resources.
- Carry out progressive rehabilitation to restore the natural environment.
- Treat the protection of safety, occupational health, the community and the environment as the responsibility of everyone working at Debswana.

5.2.3. Business Partners are expected to follow practices that are consistent with Debswana's Health, Safety, Environment and Social Performance commitments.

5.2.4. Business Partners must have a SHE and a Social Performance policy that demonstrate Business Partner management's leadership and commitment to SHE and Social Performance requirements.

5.3. ISO 45001 and ISO 14001 management systems

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- 5.3.1. Debswana has implemented management systems that meet the requirements of the international ISO 45001:2018 and ISO 14001:2015 standards (for Safety and Health and Environmental Management respectively).
- 5.3.2. Business Partners on site must comply with the requirements of these standards and must participate in activities that are needed to maintain certification to the standards.
- 5.3.3. Business Partners with the already existing SHE management systems must ensure that they align their processes to the client requirements to avoid parallel implementation of management systems.
- 5.3.4. Internal assessments shall be conducted by the client for the adoption of any management system process that might benefit the organisation from the business partner's side.

5.4. Social Performance Management Systems

5.4.1. Debswana has implemented a Social Performance management system that meet the requirements of the Anglo Social Way. The Anglo Social Way consists of ten requirements, as follows:

- Social Risk and Impact Management: proactively identify, assess and manage social impacts and risks.
- Social Performance Strategy and Social Management Plan: strategic social performance planning which aligns with Life of Mine, including closure planning.
- Stakeholder Engagement: proactively communicate, engage with and respond to stakeholders.
- Socio-economic development: pro-actively seek to deliver a lasting socio-economic benefit to communities over the project lifecycle and beyond through leveraging of our core business in employment and procurement in addition to social investment.
- Compliance with social commitments: proactively manage commitments to stakeholders.
- Social Incident Management: proactively manage and respond to social incidents, complaints and grievances.
- Community Health, Safety and Security Management: identify, prepare for and have the capability to respond appropriately to emergency and crisis situations that have the potential to impact associated communities.
- Business Partner, suppliers and business partners: ensure that social performance requirements are integrated into Business Partner and business partner arrangements as appropriate.

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- Resourcing and Capacity Development: ensure sufficient human and financial resourcing and capacities to deliver strategic objectives.
- Cultural Heritage: protect and, where possible, enhance the value of cultural heritage in accordance with the Monuments and Relics Act.

5.4.2. Business Partner must comply with the requirements of these systems and must participate in activities that are needed to maintain compliance to them.

6.

7. PLANNING AND DESIGN

7.1. Assignment of the Debswana Representative

7.1.1. The Debswana Representative assigned to oversee the work and/or in whose area and under whose jurisdiction the work is to take place will be the Business Partner's point of liaison on all matters related to Safety, Health, Environment and Social Performance.

7.2. Social Performance

7.2.1. All Business Partners doing work for or on behalf of Debswana shall commit through their response to tenders/proposals and contracts abide by the spirit and intent of CEEP (Debswana Citizen Economic Empowerment Policy) and demonstrate through monthly performance reporting of their CEEP KPIs.

7.2.2. Before the contractor comes to site visit, the social materiality of the project will be determined by the Social Performance team.

7.3. Development of SHE Plan and Social Performance Plan

7.3.1. A SHE plan will be developed by each Business Partner for the scope of works they have contracted to perform as guided by the Business Partner Categorisation table - Appendix C. The SHE plan will be presented with the bid documents and will be updated as the work progresses until contract completion. The plan will only be done once at tender or at proposal submission stage and improved when offered the job to update the SHE plan to the existing risks and operational requirements.

7.3.2. Depending upon the scope of work and as determined by the Debswana Representative, and with consultation with relevant departments, such as Corporate Affairs (Social Performance section) a Social Performance Plan may be required. The Social Performance plan shall be undertaken as guided by the Social Performance management plan guideline – appendix F.

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7.3.3. The Business Partner SHE plan and Social Performance plan shall be reviewed and approved by the Debswana Representative, Debswana Contract Manager, the Debswana SHE department and the Corporate Affairs department.

7.4. SHE File

- 7.4.1. Prior to the start of works, the Business Partner must prepare a SHE file that contains the SHE requirements in line with the Business Partner categorisation table. The file is to be kept updated with SHE records as required.
- 7.4.2. The SHE file must be kept in the Business Partner's site office with easy access for all interested parties.

7.5. Project Risk Assessment

- 7.5.1. Prior to the start of works, the Business Partner must perform a project-based risk assessment for the scope of work to identify the major risks associated with the work and these shall feed into the overall risk assessment for the department in which work is carried out.
- 7.5.2. The risk assessment should be in the Debswana template and must be approved by Safety and Sustainability Development and Corporate Affairs.
- 7.5.3. The risk assessment must identify potential unwanted events that can result in property damage, injury, illness, negative environmental impacts, and negative social or community impacts, and must give due regard to vulnerable groups (such as pregnant women)
- 7.5.4. The project-based risk assessment must be updated when major changes occur, and after incident investigations and or as the operations procedure states.
- 7.5.5. The Business Partner and the Debswana representative must identify the control measures to control all risks, and the person responsible. This includes emergency preparedness. When determining controls the Business Partner must apply the hierarchy of controls:
 - Elimination - Where possible, remove the hazard or the need to complete tasks at risk (e.g., eliminating toxic substances, hazardous equipment or processes that are not necessary).
 - Substitution – Complete the task in a less hazardous location or manner (e.g., building as much of a structure on the ground in preference to at height).
 - Engineered Solutions – Engineer or redesign the structure or equipment to reduce the hazard involved in the task (e.g., move valves from height to a lower level for operation or install remote valve operation devices).

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- Administration – Establish policies, procedures and work practices to reduce employees' exposure to risk (e.g., provide training, use warning signs, perform job and task risk analysis, and reduce time spent in noisy areas).
- Personal Protective Equipment (PPE) – The provision of personal protective equipment does not eliminate the hazard but only shields the individual. Such action will have to be coupled with training in the correct use of the equipment. PPE should be used only as a last resort

7.6. Legal and other Requirements

7.6.1. Debswana requires all Business Partners to fully comply with Botswana legislation and other requirements to which Debswana has subscribed.

7.6.2. Botswana Acts and Regulations can be purchased from the Botswana Government printers and include, but are not limited to:

- Mines, Quarries, Works and Machinery Act – Cap 44:02
- Factories Act – Cap 44:01
- Worker's Compensation Act – Cap 47:03
- Employment Act – Cap 47:01
- Explosives Act – Cap 24:02
- Environmental Assessment Act – Cap 65:07
- Water Act – Cap 34:01
- Atmospheric Pollution (Prevention) Act – Cap 65:03
- Monuments and Relic Act – Cap 59:03
- Public Health Act - Cap 63:01
- Radiation Protection Act –Cap 24:03
- Building Control Act – Cap 65:02
- Precious and Semi-precious stones (Protection) Act – Cap 66:03
- Mines and Minerals Act – Cap 66:01
- Fire Services Act – Cap 40:04
- Electricity Act – Cap 70:01
- Telecommunications Act, 1996
- Waste Management Act – Cap 65:06

7.6.3. The Business Partner must also comply with local authority requirements such as the Township by-laws when work is performed in a township.

7.6.4. The Business Partner must comply with the Environmental Management Plan (EMP) that has been developed for the project and the EMP for the mine.

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7.6.5. The Business Partner must comply with the Social Management Plan (SMP) that has been developed for the project and the SMP for the mine.

7.6.6. The Business Partner must comply with relevant Debswana requirements as outlined in standards, guidelines and other documents. These can be obtained from the Debswana representative and include (but are not limited to):

7.6.6.1. Technical requirements that cover the following processes and equipment:

- Lifting Operations
- Water Management
- Prevention of Underground Gas and Coal dust Explosion
- Shaft Management
- Effects of Blasting - Minimizing Impact
- Geotechnical Standard for Underground Excavations and Slope Stability
- Hazardous Materials Management
- Mineral Residue Facilities and Water Management Structures
- Mine Closure
- Structural Integrity
- Working at Heights
- Surface Traffic Management
- Safeguarding
- Confined Spaces
- Isolation of Energies Standard
- Light Vehicles and Buses
- Fire Prevention
- Explosives Handling
- Piping Standard
- Pressure Vessels
- Underground Mobile Equipment
- Aviation
- Emergency Management
- Surface Mobile Equipment
- Surveying
- Security Management
- Fatigue Management
- Processing Safety
- Ventilation
- Use of Firearms and Force

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7.6.6.2. Other process requirements:

- Air Quality
- Biodiversity
- Energy & GHG Emissions
- Decommissioning and Rehabilitation
- Workplace Health
- Operational Risk Management
- LFI (Learning from Incidents)
- Management of Change
- Debswana / relevant site Public Complaints Procedure
- Debswana / relevant site Chance Finds Procedure
- Debswana/relevant site Commitment Procedure
- Safe Working for Excavation Involving Building or Trenches

7.6.7. Debswana Occupational Health and Safety Agreement: this document governs the relationship between management and employees in respect of matters relating to Occupational Health and Safety. It describes roles and responsibilities of Health and Safety Stewards and SHE committees.

7.6.8. The Business Partner must ensure that he obtains copies of applicable requirements prior to the start of works and relevant copies must be kept in the Business Partner's site office.

7.7. Commercial / Contractual Issues

7.7.1. All expenses, which result from conforming to legislation as well as Debswana standards, will be for the Business Partner's account.

7.7.2. Debswana reserves the right to stop work whenever SHE and Social Performance violations are observed.

7.7.3. The expense of such work stoppage and resulting standing time shall be for the Business Partner's account.

7.7.4. Where the Business Partner does not perform as per the Debswana Safety, Health and Environmental Standard or the Social Performance Standard, Debswana reserves the right to appoint SHE and Social Performance personnel to assist the Business Partner in meeting the required standard. The cost of such intervention will be back-charged to the Business Partner.

7.7.5. The Business Partner must obtain copies of applicable requirements prior to the start of works and relevant copies must be kept in the Business Partner's site office.

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- 7.7.6. No claim will be accepted as a result of any costs or delays being incurred due to the Business Partner or sub-contractor not complying with the site rules and regulations.
- 7.7.7. Business Partner will not be allowed to work outside the working limits shown on the scope unless specifically required to do so and agreed with the Debswana representative.
- 7.7.8. All expenses, which result from conforming to legislation as well as Debswana standards, will be for the Business Partner's account.

7.8. Kick-off meeting – objectives and targets

- 7.8.1. Before the start of works the Business Partner will have a kick-off meeting with the Debswana Representative to ensure that the relevant aspects of the contract risk assessment and any other SHE and Social Performance aspects of the contract are communicated and understood by all parties.
- 7.8.2. The Debswana Representative and the Business Partner will finalise and jointly agree on SHE and Social Performance programme and detailed procedures.
- 7.8.3. The Debswana Representative will define SHE and Social Performance objectives and targets for the contract, including measurement of leading and lagging indicators.

7.9. Materials Requisitioning from Debswana Stores

- 7.9.1. Issue of goods to Business Partner from Debswana SCM is restricted to protective clothing to ensure compliance with MQWM Act requirements and consumables such as diesel, petrol and gas. Issue of goods however is at the discretion of Debswana.
- 7.9.2. These will be issued at cost plus a handling fee.
- 7.9.3. No other items will be issued to Business Partner from Debswana SCM unless covered in the contract document or allowed by Debswana.

8. IMPLEMENTATION AND MANAGEMENT

8.1. Start-up Requirements

- 8.1.1. Prior to starting work, Business Partners are to complete and get approval of a SHE Plan and associated SHE File in line with the Business Partner categories.
- 8.1.2. A proper site set up in line with the number, duration and equipment/ materials to be stored on site.

8.2. Task Planning and Continuous Risk Assessments

- 8.2.1. The Business Partner will be required to ensure that activities are continuously assessed for hazards and managed accordingly.

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- 8.2.2. For all significant tasks (tasks with consequences rate of 3 and above), a Safe Work Procedure (SWP) has to be developed which will detail the steps to be followed to ensure that work will be completed safely.
- 8.2.3. Where no SWP is available, or the SWP is not adequate, a Job Risk Analysis must be carried out.
- 8.2.4. Debswana JRA template must be used.
- 8.2.5. The SWP or JRA must be reviewed with all employees involved in the task:
- At the beginning of the work shift or start of a new task.
 - After any change in personnel.
 - When there is a change of task, hazards, or work conditions.
 - At the completion of the task to review the JRA for improvements.
- 8.2.6. Business Partner management must participate in the review of SWPs and JRAs to assist in identifying hazards and mitigating risks.
- 8.2.7. The Business Partner must ensure that the workers are conversant with the hazards in their workplace and that they are aware of the hazards generated from other Business Partner or operations in the vicinity.
- 8.2.8. Employees must continuously (before, during and after the task) look out for hazards and apply the SLAM principle:
- Stop
 - Look for hazards
 - Assess the risk
 - Manage the situation – if they cannot address the hazard then they must report to their supervisor.
- 8.2.9. Failure to execute tasks according to their risk assessment will be seen as a contractual deviation and standing time due to stoppage of work shall be on the Business Partner's account, no time or cost to be added to the contract price or schedule.

8.3. Work and Residence permits

- 8.3.1. Work and residence permits are required for persons that are not citizens of Botswana.
- 8.3.2. The Business Partner is responsible for obtaining the necessary permits from the Department of Labour (work permits) and Immigration (residence permits).
- 8.3.3. Copies of the permits must be kept on site for inspection by Debswana.

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8.3.4. Botswana citizens are required to produce national ID card (Oman) as and when required.

8.3.5. Engineers Registration (A Practicing Engineering Certificate) from ERB (Engineers Registration Board) is required for all Engineers engaged by the Business Partner.

8.4. Legal Appointments

8.4.1. Legal Appointments – Responsible Persons

8.4.1.1. The Business Partner shall not start work until applicable legal appointments have been made.

- 8.4.1.2. A Business Partner site manager must be appointed in terms of the MQWM Act:
- A site manager is responsible for the control, management, and direction of the site as outlined in the appointment letter.
 - A site manager appointment will be initiated by the Debswana representatives and 9.4 appointee for the area

8.4.1.3. The Mine 9.4 appointee may appoint one or more competent persons to assist him in ensuring that all SHE requirements, legal statutes, policies and procedures are complied with.

8.4.1.4. The Mine 9.4 may appoint one or more competent persons under regulations 17 or 18 to assist him in ensuring that all safety, health and environmental, standards and regulations are complied with.

- 17.1 - Plant general foremen, shift foremen, shift boss, deputy shift boss – as per MQWM regulation 17(1).
- 18.1 - Person in charge (first line supervisor) - as per MQWM regulation 18(1).

8.4.1.5. The Business Partner will use the standard appointment letter for appointing competent or responsible persons and Debswana representative shall assess the requirements for the number of Responsible Persons, their duties and their competency.

8.4.2. Legal Appointments – Engineering Appointments

8.4.2.1. Business Partner Electrical Personnel must be appointed in terms of the MQWM Act regulation 13(2):

- The Mine Electrical Engineer (13(1) appointee) will appoint the Subordinate electrical engineer, electrician in-charge, and electrician.

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8.4.2.2. The required qualifications are:

- Subordinate Electrical Engineer: at least 1st degree in electrical engineering from an accredited university.
- Electricians in charge: diploma in relevant engineering field with 5 years industrial experience or National Craft Certificate in relevant field with 8 years of experience.
- Electricians: National Craft Certificate in the relevant field.

8.4.2.3. Semiskilled and trainee electricians do not qualify to be appointed.

8.4.2.4. Business Partner Mechanical Personnel must be appointed in terms of the MQWM Act regulation 14(2)

- The Mine Mechanical Engineer (14(1) appointee) will appoint the mechanics.
- Mechanics include artisan riggers, fit and turners, fitters, millwrights, boilermakers, mechanical charge hands, mechanical foremen, auto-mechanics, diesel mechanics, mechanical/ hydraulics/ pneumatics/ instrumentation/testing (mechanical) technicians or technologists, first line maintenance superintendent, etc.

8.4.2.5. The required qualifications are:

- Subordinate Mechanical Engineer at least 1st degree in mechanical engineering from an accredited university
- Mechanics in charge: diploma in relevant engineering field with 5 years of industrial experience or National Craft Certificate in relevant field with 8 years of experience
- Mechanics: National Craft Certificate in the relevant field

8.4.2.6. Semi-skilled and trainee mechanics do not qualify to be appointed.

8.4.3. Legal Appointments – Other

8.4.3.1. Depending on the project other legal appointments may be required, such as:

- Surveyor, ventilation officer or process engineers – as per MQWM Act regulation 15(1)
- Person responsible for the control, management and direction in the use of explosives shall be appointed as per regulation 10(1) of the Explosives regulations and the Magazine master – as per regulation 46 of the Explosives regulations.
- Persons responsible for demolitions shall be appointed under regulation 270.

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- Persons responsible for construction shall be appointed under regulation 250.
- Fire Co-ordinators (as per regulation 151(1) of the MWQM Act)

8.4.4. Business Partner must submit copies of CVs and qualification certificates for those persons that need to be legally appointed.

8.4.5. The responsibilities of the legal appointees will be detailed in the letter of appointment.

8.5. Internal Appointments

8.5.1. Appointment of Safety, Health and Environmental Official

8.5.1.1. Where a Business Partner has more than 25 personnel on the construction site and the duration of the contract is more than 3 months the Business Partner must employ a full time, SHE official

8.5.1.2. The Business Partner is also expected to submit a SHE Structure to Debswana for approval in line with the risks for the work to be undertaken. The number of SHE Officers on site will be determined by the nature of the activities, risk profile and the scope of work to enable a SHE officer to effectively cover the areas of work as similar to that of 17.1 appointee (5 hours). Where the hazards and risks pertaining to the work are significant. Debswana reserves the right to request the appointment of a SHE Officials irrespective of the number of employees at site and or duration.

8.5.1.3. The Business Partner SHE official must be approved by the Debswana Safety and Health Manager and will be expected to be suitably qualified and experienced.

8.5.1.4. The minimum qualification for the official is a Diploma in Safety management, environmental health, environmental science, occupational health, safety and environment or equivalent plus two years' experience in the relevant field.

8.5.1.5. The SHE official shall be expected to assist the site manager with the implementation and management of safety, health and environmental programmes and management systems in line with the mine's SHE policies requirements and standards.

8.5.1.6. The Business Partner must provide the SHE official with the necessary resources (such as transport and means of communication) to effectively perform their duties.

8.5.1.7. The SHE Official must be trained on ISO 45001 and ISO 140001 auditing to ensure seamless implementation of the standards in area of operation

8.5.2. Appointment of Safety, Health and Environmental Representative

8.5.2.1. Where a Business Partner employs 10 or more persons on site, the Business Partner shall appoint a Safety, Health and Environmental representative that is elected by the Business Partner employees.

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8.5.2.2. The Safety, Health and Environmental representative must be able to read and write and must have at least 12 months experience (Not necessarily with Debswana) and be familiar with the work that the Business Partner Company performs on site.

8.5.2.3. The duties and responsibilities of the Safety, Health and Environmental representative shall include the following:

- To represent employees in discussions with the employer on health and safety and environmental issues.
- To conduct at least one safety, health and environment inspection per month or as and when prompted by arising business needs i.e. scheduled statutory inspections, regulators body visits.
- To report immediately any Health and Safety hazards and environmental aspects within the Business Partner site to the immediate responsible supervisor and/or to the Health, Safety and Environment Officer.
- To consult, discuss and record issues raised by employees, and to notify supervisors or SHE Committees as required.
- To ensure that results of these inspections, complaints, observations, suggestions, etc. are recorded and effective corrective actions are identified for implementation
- To record matters pertaining to safety and health and environment in an inspection checklist - a copy of such record shall be handed to the Supervisor of the workplace, and to the Debswana Representative for logging into portals i.e. Isometrix, SAP.
- To attend Safety, Health and Environment (SHE) meetings.
- To assist in the investigation of incidents and causes of occupational illnesses and participate in investigations and enquiries.
- To participate in workplace inspections conducted by government inspectors.
- To participate in health, safety and environment audits.

8.5.3. Internal Appointments

8.5.3.1. The Business Partner should have a senior member of staff on site responsible for issues of social performance, public safety, public liaison, land issues and community complaints.

8.5.3.2. Depending upon the nature of the work and the size of the Business Partner staff, the Business Partner may have to make additional appointments such as:

- Social Performance Officer and/or Community Relations Manager
- Occupational Hygiene representative.
- First Aiders
- Excavation supervisor

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- Scaffolding supervisor
- Explosives supervisor
- Demolition Supervisor
- Construction vehicle & mobile equipment Operators
- Lifting Machine Operators
- Lifting tackle and equipment Inspectors
- Fall Protection Plan Coordinator
- Formworks Supports Supervisor
- Critical Lift Supervisor

8.5.3.3. Records of all appointments are to be kept by all Business Partner and copies forwarded to the Debswana Representative as required.

8.6. Medicals and Inductions

8.6.1. Medicals

- 8.6.1.1. All persons that work for the Business Partner must undergo a pre-employment medical examination to be conducted by a Debswana medical practitioner (or a medical practitioner authorised by Debswana) who will issue a Certificate of Fitness.
- 8.6.1.2. The pre-employment medical examination shall be completed before going for induction.
- 8.6.1.3. When a Business Partner employee ceases to work on the contract, the employee must undergo an exit medical examination to be conducted by a Debswana medical practitioner (or a medical practitioner authorised by Debswana) who will issue an Exit Certificate
- 8.6.1.4. Medicals will be done periodically as per the Similar Exposure Groups.
- 8.6.1.5. Business Partner are responsible for making bookings for the medical examinations.
- 8.6.1.6. The cost of all medical examinations and services will be for the Business Partner's account and shall compile monthly compliance report.
- 8.6.1.7. The contractor shall allow time in the work schedule for all personnel to go through the medical process

8.7. Inductions

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- 8.7.1.1. It is the responsibility of the Business Partner to ensure that all his personnel are inducted before being allowed on the work site and suitable records must be maintained of all inductions.
- 8.7.1.2. It is the Business Partner' responsibility to allow time in the work schedule for all personnel to go through the induction process and to receive any task specific training that may be required.
- 8.7.1.3. The inductions comprise of the following:
- General SHE and Security induction - to give all employees guidance and direction as to the general SHE, Security requirements of Debswana.
 - The general induction is offered on specific days. The Business Partner is to liaise with the Debswana representative to determine the time and dates for inductions.
 - The Medical Certificate of Fitness must be presented at the SHE induction room at the start of the general induction.
 - Site Specific SHE- to cover site rules and regulations and the hazards and controls associated with the operation.
 - Supervisors may be required to attend an additional induction training session for safety leadership.
 - Some contracts require an additional social performance induction for specific staff around the project's social context and Debswana's Social Performance approach.
- 8.7.1.4. The inductions must be repeated annually and when the employee has been absent for more than 2 weeks.
- 8.7.1.5. Debswana reserves the right to conduct tests after the inductions to gauge understanding and knowledge of the material covered during the inductions. If a Business Partner employee fails, the test he/she will be required to undergo the induction again before starting work.

8.8. Employee Recruitment, Training and Awareness

8.8.1. Employee Responsibilities

- 8.8.1.1. In accordance with regulation 30 (c) of the Botswana Mines, Quarries, Works and Machinery Act, employees are responsible for their own safety and that of their co-workers in their work area.

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8.8.1.2. Employees must be made aware of their responsibilities during induction and awareness sessions. Some of these responsibilities are:

- Familiarizing themselves with their workplace and safety procedures.
- Working in a manner, which does not endanger themselves or others.
- Keeping their work area tidy (Housekeeping).
- Reporting all injuries.
- Protecting fellow workers from injuries.
- Reporting unsafe acts, conditions, near hits, property damages and incidents.
- Reporting any situation, which may become dangerous.
- Carrying out lawful orders and obeying safety rules.
- Behaving in an appropriate way when in, or dealing with, the local community.
- If they become aware of any person disregarding a safety notice, instruction or regulation, they shall immediately indicate this to the person concerned, if he/she persists the matter must be reported to the supervisor.

8.8.2. Labour practices

8.8.2.1. The hours worked by the Business Partner and sub-contractor must comply with the Botswana Employment Act particularly as regards the limit on overtime and work on Sunday and public holidays.

8.8.2.2. Requests for exemptions must be submitted to the Debswana Representative not later than end of business hours on the Thursday preceding the weekend on which the work is intended to be carried out.

8.8.2.3. If a person is over the age of 60, the Business Partner must notify the Debswana representative of the duties of such person.

8.8.2.4. All Business Partners are required to have a disciplinary policy and procedures in place and are expected to enforce them as and when necessary, in accordance with the Botswana Employment Act and labour practices.

8.8.3. Training and Awareness

8.8.3.1. The Business Partners must ensure that all employees and sub-contractors are competent and adequately trained to perform the tasks allocated to them. The Business Partners shall ensure that the Supervisors satisfy themselves that the employees are conversant with all hazards with any work to be performed.

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8.8.3.2. The Business Partner must have a daily safety meeting.

- This will include the discussion of any standard task procedures or hazardous operational procedures to be performed by the employee, as outlined in the Job Risk Analysis (JRA).
- The JRA must be discussed as a toolbox talk topic at least once a week provided the activity has not changed.
- A copy of the items discussed with signatures of all employees present is to be kept on file.
- The Business Partner will be expected to promote safety by displaying safety slogans, logos, achievements, bulletins, etc.

8.8.4. Language

8.8.4.1. All communications which include regulations, instructions, signage etc. pertaining to the work must be communicated in a language understood by all persons on site.

8.8.4.2. This language will be either English or Setswana or both.

8.8.5. Human Relations and Community Issues

8.8.5.1. The Business Partner shall respect people's land and property and not enter without prior permission.

8.8.5.2. All conflicts, disagreements and any agreements, or any resolutions no matter how trivial, shall be logged and dated, with details of persons involved and subject matter, in a book for this purpose at the site office.

8.8.5.3. The Business Partner shall have adequate personnel to manage human relations on site (see section below on nominated person).

8.8.5.4. The Business Partner shall set up regular liaison meetings with representatives of SHE and Social Performance and the Debswana representative

8.8.5.5. Plant operators and drivers of trucks should have due respect for the sensitive township area near which they are working. Routes should be carefully planned and designed to ensure minimum disruption.

8.8.5.6. The Business Partner must enforce careful and responsible driving on public highways, especially in residential areas. National speed limits must be obeyed.

8.8.5.7. Outside the site proper signage must be erected for diversions, warning of heavy plant, etc. and the road maintained and cleaned at all times to prevent any risk to public safety.

8.8.5.8. Local residents should be made aware of the dangers of the construction site and plant, especially on haul routes.

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8.9. Site Establishment, Housekeeping and Hygiene

8.9.1. Site Establishment

- 8.9.1.1. Sites for the establishment of Business Partners will be allocated by the Debswana representative in the area where the work is to be undertaken.
- 8.9.1.2. Where the Business Partner has to establish a contractor's camp, it should be suitably positioned within the site to avoid unnecessary loss of vegetation, to reduce pollution potential, and away from drainage lines. It should also be located so that noise affects neighbouring residents as little as possible.
- 8.9.1.3. The construction site should be closed to public access at all times
- 8.9.1.4. Where possible Business Partner will demarcate and fence off their work site, and display "NO unauthorised access" signs. The Business Partner is expected to strategically provide a board with necessary information pertaining to the Business Partner itself. Such information includes but is not limited to:
 - The name of the Business Partner prominently displayed by the main entrance
 - Names and contact telephone numbers of responsible persons
 - Symbolic safety signs relevant to the undertaking works
 - All symbolic safety signs must be visible and readable to customers.
 - Business Partner SHE Performance.
- 8.9.1.5. All workshops are to have an impermeable surface sloped to an oil trap that gets emptied regularly.
- 8.9.1.6. The Business Partner is required to keep his site tidy and free of debris at all times.
- 8.9.1.7. Waste must be classified and separated into domestic, metal, hazardous, oily rags & contaminated sand prior to disposal into waste skips / bins in accordance with site waste management procedure
- 8.9.1.8. Sufficient waste containers are to be placed at appropriate areas and are to be cleaned regularly.
 - All debris generated by the Business Partner must be collected and taken to a designated area at least on a weekly basis for onward disposal to an approved licensed disposal area in accordance with Botswana legislation.
 - The Debswana Representative must be consulted for the disposal of hazardous waste such as chemical products, fuels and lubricants.
 - All fluorescent tubes are to be disposed of as per the Debswana's standard.
 - Sale of waste is not permitted on site.

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- Adequate care must be taken by the Business Partner to ensure that storage and stacking is correctly and safely carried out to allow free movement of personnel to improve housekeeping.
- 8.9.1.9. Flammable substances (stored oils, lubricants) must be properly stored in designated areas or cabinets that are adequately ventilated and not exposed to any source of flame or heat.
 - All storage areas of flammable substances shall be signposted accordingly (e.g. “no smoking”, “no naked flames”).
 - All fuel and oil storage areas must be on an impermeable surface within a bund to hold the necessary quantity of liquid should there be a spillage. The bund must meet the sites procedural requirements for bund walls
 - All necessary firefighting equipment and signage shall be in place as well.
 - The Business Partner must clean up spillages in line with the site procedure without delay to the approval of the Debswana Environment Office.
- 8.9.2. Hygiene
 - 8.9.2.1. The Business Partner will provide temporary ablution and welfare facilities shall be provided for employees in areas where company facilities authorised by Debswana representative are not available.
 - The ablution and welfare facilities shall be maintained in a clean and hygienic condition by the Business Partner.
 - Temporary toilets should be self-contained units, emptied regularly and serviced in accordance with Department of Sanitation and Waste Management (DSWM) Department of Waste Management and Pollution Control regulations and requirements.
 - All temporary ablution and shower facilities effluent shall be disposed off into a collection tank.
 - Emptying of collection tanks will be coordinated through the Debswana representative taking in considerations the security requirements
 - No food will be allowed in the workplace except in designated areas.
 - Water for drinking purposes shall be provided by the Business Partner from sources indicated to the Business Partner by the Debswana representatives
 - 8.9.2.2. No equipment or system shall be connected to the drinking water system without the permission of the Debswana representative
 - 8.9.2.3. Good Hygiene standards shall be maintained in line site requirements
 - 8.9.2.4. Fire-fighting equipment shall not be used for any other purpose then fire fighting.

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- 8.9.2.5. In the event of carrying out their activities during the night, Business Partner must ensure that lighting is adequate in all areas of work.
- 8.9.2.6. Furniture shall be aligned to site standards and Ergonomics procedures, no defective and worn-out furniture to be allowed on site.

8.10. Security

8.10.1. General

- 8.10.1.1. Business Partners are required to comply with the Debswana security requirements.
- 8.10.1.2. Prior warning must be given, and clearance obtained before any person can be allowed into the mine.
- 8.10.1.3. Debswana reserves the right to inspect any item at any time when on company premises.
- 8.10.1.4. Debswana also reserves the right to search any person at any time when the person is on company premises.
- 8.10.1.5. Business Partner's vehicles are also subject to search prior to leaving the area.
- 8.10.1.6. The removal of goods from Debswana premises or from the mining area must be accompanied by a valid waybill describing the items being transported.
 - The waybill must be signed by the authorised senior Debswana officials
 - The Site manager must ensure that he knows which equipment may enter or exit the Mine security area through liaison with the relevant security officials

8.10.2. Security at Diamond Mine Sites

- 8.10.2.1. For security purposes Debswana has 4 colour codes indicating levels of security:
 - Red and Pink: High security areas. The movement of goods and persons into the red and pink areas is strictly controlled and close liaison with the security department is required
 - Blue: Mining areas
 - Green: All other areas accessible through the check point next to security offices.
 - White: Township areas
- 8.10.2.2. Should a diamond be found, the matter should be reported to the finder's supervisor as per the diamond pick-up procedure which entails that the finder must remain at the spot, guarding the diamond until the arrival of a security

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official who shall remove the diamond and follow the pick-up procedure. The Finder may be entitled to reward as per the pickup procedure.

8.10.2.3. Searching and scratching for diamonds is not permitted.

8.10.3. Intoxicating Liquor and Drugs

8.10.3.1. Intoxicating liquor and narcotic drugs are not permitted on the mine and Debswana premises, and any person found in possession of, under the influence or appears to be under the influence of these substances will be removed and not be permitted back in the mine.

8.10.3.2. Debswana will carry out testing for alcohol and drug intake for the following reasons

- When an employee voluntarily seeks help
- When it is reasonably suspected that the employee is under the influence of alcohol
- Mandatory testing after an accident involving company vehicles/machinery.
- Follow up testing upon return to duty after a previously positive test.
- Routine testing to detect the presence of alcohol or narcotics drugs.
- Mandatory alcohol test for anybody going into the blue area.

8.11. Emergency Preparedness

8.11.1. The Business Partner must ensure that his personnel are familiar with the Debswana emergency preparedness systems (including fire alarms, location of assembly points and emergency procedures).

8.11.2. If an audible fire alarm is activated, all persons are required to leave their place of work and assemble at the designated emergency assembly area in their respective work areas.

8.11.3. The Business Partner must conduct a fire evacuation exercise at intervals not exceeding six months and keep a record of the results of the exercise in line with Debswana requirements

8.11.4. Wide fire paths should be retained throughout the site at all times during the construction.

8.11.5. Where necessary the Business Partner will provide additional emergency preparedness systems, which may include:

- The provision of an emergency contact board with the Business Partner and the mine emergency contact numbers

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- First aid equipment (complying to mine standard) and trained first aid personnel (at least 1 per 50 employees)
- Fire-fighting equipment at strategic points and trained fire-fighting personnel. The equipment must be inspected by a competent person (recognised by Debswana) at intervals not exceeding 30 days.
- A fire alarm in the Business Partner's premises and a suitable emergency assembly point.

8.12. Occupational Health Hazards

8.12.1. Occupational Hygiene

8.12.1.1. The mine operates an Occupational Hygiene programme and the Business Partner is expected to comply with the monitoring requirements (e.g. noise, vibration, airborne pollutants). Business Partner employees are required to comply with a request for personal monitoring.

8.12.1.2. The Business Partner has the responsibility to ensure that health stressor levels are within the Occupational Exposure Limit (OEL) and do not pose an unacceptable risk to the workforce. Areas posing a risk to the employees' health or above the recommended limit must be zoned and properly demarcated (noisy/dusty areas)

8.12.1.3. The Business Partner will put programmes in place to manage health hazards (as informed by the risk assessment):

- Hearing conservation: to protect the hearing of Business Partner employees that are exposed to high noise levels:
 - procurement of less noisy equipment to prevent exposure to noise (buy quiet equipment)
 - Reduce noise levels at the source (reduction of vibration, insulation, ...)
 - Monitoring of noise levels
 - Provision of PPE (hearing protection)
- Respiratory protection: to protect Business Partner employees from respiratory hazards.
 - Reduce sources of air pollutants (management of chemicals)
 - Ventilation
 - Air Quality monitoring

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- Provision of PPE and guidance on the respirator selection, use, maintenance and care, fit testing, storage and training
- Vibration: to provide guidance to control health stressors associated with employee exposure to whole body vibration and hand arm vibration.
 - Monitoring of vibration
 - fitting of suspension seating on vibrating equipment such as Earth moving vehicles
- Thermal stress - to mitigate against risk of exposure to cold or hot temperatures:
 - Access to clean water at all times in hot environments
 - Health Education and Promotion, where employees are trained about the health effects of such (causes, identification of signs/symptoms, preventative and first aid measures)
 - Provision appropriate personal protective clothing as applicable

8.12.2. Hazardous chemicals/substances

8.12.2.1. The Business Partner must maintain an inventory/register of all hazardous materials.

8.12.2.2. The Business Partner shall be licensed to trade in chemicals by requiring clearance certificate from the Ministry of health [Industrial chemicals] and Agriculture [Pesticides]

8.12.2.3. All hazardous chemicals and substances required to be brought on site shall be examined and cleared by the Standards Officer in advance and it should go through the hazardous chemicals committee

8.12.2.4. All Hazardous substances shall be accompanied with the 16-point MSDS sheet upon first delivery. The Business Partner must keep the MSDS sheet on record and must inform and train the employees, who will be exposed to the product, accordingly.

8.12.2.5. All containers shall be properly labelled with the manufacturers or distributor's warning labels and that all employees are provided with the required PPE as per the instructions on the MSDS sheet.

8.12.2.6. When not in use, these chemicals / substances shall be stored in suitable storage facilities that must be approved by the Debswana Contract manager. Business Partner are to ensure that chemicals are disposed of as per MSDS.

8.12.3. Protection of pregnant and nursing employees

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8.12.3.1. Business Partner should ensure that risks of exposure to pregnant and nursing employees are assessed and managed. Measures should be put in place to remove pregnant and breastfeeding employees from risk that can impact on their health, safety and well-being.

8.12.4. Fatigue Management

8.12.4.1. For safety-critical jobs (where fatigue result in serious incidents, such as drivers of mobile equipment) the Business Partner shall develop a fatigue management programme in line with Debswana's fatigue management standard.

8.12.4.2. Employees that are fatigued shall be encouraged to self-report to their line manager who shall address the risk as outlined in the programme

8.12.5. Personal Protective Equipment

8.12.5.1. Business Partner shall ensure that their employees wear appropriate protective clothing,

8.12.5.2. The Business Partner is responsible for providing staff with the necessary and correct protective clothing and equipment as per Debswana site PPE Procedures. The procedures can be obtained from the Debswana representative.

8.12.5.3. All PPE must be approved by the Botswana Department of Mines and a copy of the certificate must be on file with the Business Partner. Business Partner should request for proof of certification by Department of Mines from the PPE retailers

8.12.5.4. Following PPE is required on mining sites:

- Shirts (long sleeve mandatory)
- Hard hat
- Safety glasses
- Steel cap safety footwear (boots covering ankles)
- High visibility vest or high visibility clothing (e.g. overalls with reflective stripes on arms and legs).

8.12.5.5. On construction sites, gloves and hearing protection must be carried by all workers at all times so that they are available when required.

8.12.5.6. In certain areas or for certain activities, other PPE may be required, such as hearing protection, chin straps, fall protection, face shields, specialized gloves, welding shields, etc.

8.12.5.7. Persons working near stagnated water or pool of slimes and slurry wastes where the risk of fall exists must wear life belts/jackets.

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8.12.5.8. The Business Partner shall ensure that workers are issued with a sufficient number of overalls in line with the procedure to ensure that they always have a clean PPE in good condition to wear.

8.12.5.9. The Business Partner shall ensure that his employees understand why the personal protective clothing is necessary and that they use and maintain them correctly.

8.13. Driving, Transportation and Accommodation

8.13.1. Vehicle Drivers

8.13.1.1. All drivers are required to be in possession of a valid Botswana's driver's license. Foreign drivers' licenses can be used up to 30 days

8.13.1.2. All persons driving a Business Partner vehicle must have an authorisation from the Business Partner's representative.

8.13.1.3. All drivers of Debswana vehicles must also be in possession of a valid Debswana authorisation permit, which requires passing a Debswana test.

8.13.1.4. Operators of mobile equipment must undergo a Debswana evaluation to obtain the required on-site operator authorisation.

8.13.1.5. No person is allowed to drive in the Blue security areas unless he/she is in possession of a valid open pit driving authorisation permit issued by the particular mine training section.

8.13.1.6. Business Partners are required to obey traffic rules and regulations and to enforce compliance by their staff.

8.13.2. Light Vehicles

8.13.2.1. The Business Partner must maintain his vehicles in a roadworthy condition.

8.13.2.2. Light Vehicles must comply with Technical Standard for Light Vehicles. These include passenger vehicles, all-wheel drives, SUV's, pick-ups, minibuses, buses etc.). This includes (but is not limited to) the following requirements:

- Seat belts for all occupants (including at the back of the vehicle)
- No passengers can be transported at the back of a Light Duty Vehicle (pick-up or bakkie) unless the LDV has been fitted with seats and seat belts
- Each Business Partner vehicle must have reflective strips on the bull bars and sides of the vehicle
- Each vehicle to have emergency triangles, first aid kit and fire extinguisher
- Each vehicle to have a logbook, to be completed daily by the driver prior to use

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- Mobile phones and radios shall only be used by the driver when the vehicle is stationary, unless fitted with a hands-free kit.
- 8.13.2.3. Material transported in the load box of vehicles shall be secured to prevent it from dislodging and falling accidentally
- 8.13.2.4. All light duty vehicles entering Blue Security areas must be fitted with a red whip flag, visibility aids frame fitted with two revolving lights and chevron boards and other requirements stipulated in the Technical Standards.
- 8.13.2.5. Vehicles must not be parked within 25 meters from earthmoving machines.
- 8.13.2.6. Light vehicles having positive interaction with mobile equipment will have to install Collision Avoidance Technology.

8.13.3. Earthmoving equipment

8.13.3.1. Earthmoving equipment shall comply with Technical Standard for Mobile Equipment. This includes, but is not limited to, the following:

- Seat belts for all occupants
- Audible reverse alarms
- adequate walkways and railings
- chock blocks for rubber tired mobile equipment
- signage that allows clear and easy identification
- approved or certified roll-over protection
- operator overhead protection system
- fire suppression system being capable of being activated from both ground and cabin levels
- A method for transporting supplies and personal items to and from the operator cabin whilst maintaining 3-point contact (e.g. backpack or shoulder strap bag).
- Adequate collision avoidance technology or procedures must be in place.
- Earthmoving equipment has the right of way at all times.
- Following distances of earthmoving machinery of at least 50m (as prescribed by Debswana policies and procedures) shall be adhered to.

8.13.4. Accommodation and Transport to Site

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- 8.13.4.1. Where possible, the Business Partner shall provide suitable accommodation for all employees and where not possible the Business Partner will provide suitable accommodation allowance.
- 8.13.4.2. If the standard of accommodation is deemed to be unsuitable, the Business Partner will be required to take the necessary remedial action.
- 8.13.4.3. Business Partner should plan work in such a manner as to minimize travelling after dark, due to increased hazards on the road.
- 8.13.4.4. Personnel should only be transported by means of vehicles designed for the purpose (buses etc.). Transport of personnel on open LDV's, tipper trucks or other open vehicles is not permitted.
- 8.13.4.5. Where the Business Partner is given a site to develop a camp it should be inspected and approved by a Debswana representative to be deemed suitable.
- 8.13.4.6. Contactor must provide transport to and from the mine for all its employees that need transport

8.14. Electrical Safety, Permits and Management of Key Risks

8.14.1. Electrical Installations

- 8.14.1.1. All temporary electrical installations are to be inspected at least once a week by a competent person and the records of these inspections are to be recorded in a register to be kept on site.
- 8.14.1.2. All extension cords are to be safely hooked away from traffic areas and or lying on the ground where they may cause a tripping hazard.
 - When suspended, they must be suspended in such a manner that they do not cause a secondary hazard,
 - They must be situated neatly; clear of stairs and walkways, and no strain is to be placed on connection points at any time.
- 8.14.1.3. A Business Partner requiring high tension switching should liaise with the Debswana Contract Manager. Business Partners are not permitted to effect the switching of any devices without authorisation.
- 8.14.1.4. If a portable generator is providing electric power to a structure by connection via a transfer switch to a structure (home, office, shop, trailer, or similar) it must be connected to a grounding electrode system, such as a driven ground rod.

8.14.2. Overhead High voltage (HV) Services

- 8.14.2.1. Unless otherwise stipulated, a minimum 10-meter exclusion zone exists around any overhead power line.

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8.14.2.2. In all cases where equipment must operate within this exclusion zone, a permit with an isolation of that power source will be required.

8.14.3. Lock Out Procedures

8.14.3.1. Business Partner must comply with the Debswana site specific lockout procedure and with the Technical Standard on Isolation to ensure that all machinery or equipment with the potential of unexpected operation, movement, release of energy or the release of hazardous materials, have been locked out prior to work being performed on it.

8.14.3.2. Padlocks and tags used for lock-out/tag-out must meet Debswana requirements including prescribed colour (procedure can be obtained from the Debswana representative)

8.14.4. Permit to Work

8.14.4.1. The Business Partner must ensure that the proper permit is on hand and duly authorised by the relevant official before commencing the work in question.

8.14.4.2. Some of the activities that require a permit to work are:

- Hot work (for activities such as burning, welding, grinding, etc.)
- Excavation
- Working at heights (any work where there is potential to fall)
- Working in confined spaces
- Removal of any part of any access walkway
- Working near High Tension services

8.14.5. Working at Heights

8.14.5.1. Work at heights must comply with the Technical Standards on Working at Heights

8.14.5.2. The guideline applies Any work in any place, including at, above, or below ground level, where a person could be injured if they fell from that place

8.14.5.3. The fall hazards must be controlled as per the fall protection hierarchy:

- Eliminate fall hazards: remove the need for work to be done at height
- Prevent the fall by guarding (walking platforms, scaffolds)
- Restrain the fall: use fall restraint equipment such as inertia reel.
- Arrest the fall: catch the worker (fall arrest systems)
- Administrative measures: warn, control, train

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- 8.14.5.4. Anchor points must be able to withstand 22kN (about 2200 kg), designed and approved by a competent person
- 8.14.5.5. Where dedicated anchor points are not available, anchor points shall be identified through a risk assessment process and shall be approved by a competent person prior to the start of work.
- 8.14.5.6. The risk assessment must also consider the fall clearance and the provisions for rescue.
- 8.14.5.7. Where the use of personal fall arrest equipment is required, a person shall not work alone.
- 8.14.5.8. There shall be other personnel in the vicinity that can raise the alarm immediately should a person fall.
- 8.14.5.9. Persons working at height shall ensure that their safety helmets are secured by using a helmet chinstrap to retain their helmet on the head.

8.14.6. Machinery, Tools and Equipment

- 8.14.6.1. The Business Partner is responsible for supplying and maintaining all the machinery (including cranes), tools and equipment that he may require to perform work.
- 8.14.6.2. All rock drilling, rock boring and portable rock-breaking equipment (e.g. drill rigs) shall be pre-approved by the Department of Mines
- 8.14.6.3. All equipment (mobile and other) must be inspected by a Debswana appointed engineer before being allowed on site.
- 8.14.6.4. The engineer will issue a letter of inspection that the Business Partner must keep on record.
- 8.14.6.5. All equipment must comply with the requirements of the Debswana Technical Standards.
- 8.14.6.6. The Business Partner shall ensure that all machinery, tools and equipment are used and maintained in a good condition, and that they are inspected as required by legislation and Debswana standards.
- 8.14.6.7. Machinery, tools or equipment that is of a sub-standard nature or poses a threat to the health and safety of persons will not be allowed into Debswana premises.
- 8.14.6.8. No unapproved “site fabricated purpose made tools” will be allowed on site.
- 8.14.6.9. Tags or other similar identifications must allow monitoring regarding inspections.
- 8.14.6.10. In exceptional circumstances, the Business Partner may be authorized to hire equipment or a machine from Debswana at a specified rate.

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- If such authorization is given, no claim will be entertained as a result of any delay or additional cost that the Business Partner might incur due to the mine equipment or machine not being available for any reason whatsoever.
- The Business Partner will be liable for the repair of any damage to equipment or machinery which occurs whilst it is being hired by the Business Partner, fair wear and tear excluded

8.14.7. Scaffolding

- 8.14.7.1. Scaffolds must comply with South African standard SANS 10085-1 (The design, erection, use and inspection of access scaffolding Part 1: Steel access scaffolding) and MQWM Part XVIII
- 8.14.7.2. Scaffolding shall be erected, altered or dismantled under the supervision of a competent person who has been appointed in writing for this purpose.
- 8.14.7.3. Working platforms of scaffolds shall be fully planked (tied or locked decking) and fitted with a kick-plate that is at least 150mm high.
- 8.14.7.4. Substantial guardrails and knee-rails must be provided on all sides except the side facing the structure.
- 8.14.7.5. The scaffold must have a safe means of access (stair or ladder that extends 1 meter past the landing).
- 8.14.7.6. Once erected, inspected and approved for use by the competent person, a green "safe for use" tag is to be placed at the access point.
- 8.14.7.7. The reverse side of the tag must be signed and dated by the competent person.

8.14.8. Excavations

- 8.14.8.1. The Business Partner shall ensure that all excavation work is carried out under the supervision of a competent person who has been appointed in writing.
- 8.14.8.2. The Business Partner shall evaluate the stability of the ground before excavation work begins and shall adequately secure the walls of the excavation by shoring, bracing or providing the maximum angle of repose.
- 8.14.8.3. No material shall be stored within 1 meter of the edge of the excavation.
- 8.14.8.4. A safe means of access must be provided within 6m of the persons working in the excavation.
- 8.14.8.5. The competent person must inspect the excavation daily (prior to each shift), after blasting, after unexpected fall of ground, after rain, and after substantial damage to supports.
- 8.14.8.6. The excavation area must be hard barricaded to prevent accidental access.

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8.14.8.7. Excavation of trenches, pipe laying and backfilling should be co-ordinated and managed in such a way that open trenches do not become conduits for stormwater. This will reduce the potential for erosion and trench collapse. Crucial to this is minimising the length of trenches open at one time. It is recommended that no more than 50m of trench is left open at any one time.

8.14.9. Lifting Machinery and Tackle

8.14.9.1. Lifting operations must comply with the Technical Standard on Lifting Operations.

8.14.9.2. A register of all lifting equipment is to be maintained.

8.14.9.3. A system of periodic inspection shall be in place for all cranes and lifting equipment.

8.14.9.4. Lifting tackle must be color-coded to confirm compliance with certification and inspection requirements.

8.14.9.5. Operators, supervisors and inspectors must be competent, and competency must be assessed by an approved examiner.

8.14.9.6. The Business Partner shall ensure that every lifting machine is operated by an operator specifically trained for the particular type of lifting machine and who is in possession of a certificate of training.

8.14.9.7. Working under suspended loads shall be avoided.

8.14.10. Machine Guarding

8.14.10.1. Equipment safeguarding must comply with the Technical Standard on Equipment Safeguarding.

8.14.10.2. Guards shall only be removed for maintenance and repair after plant and equipment have been isolated, locked out, tagged and tested in line with the Technical Standard on Equipment Safeguarding.

8.14.10.3. Equipment safeguarding must be provided wherever people are exposed to:

- Moving parts of plant
- Mobile machines
- Equipment and power tools
- Moving equipment
- High pressure equipment
- Electrical

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- Any energy source with the potential to move, as well as objects falling or projecting from moving parts.

8.14.11. Safe Start Alarms

- Where possible, before a machine is started, an alarm must sound to give warning.
- All persons are required to avoid contact with machinery that is being started.

8.14.12. Blasting Operations

- Normal operations require that blasting take place on a regular basis.
- Prior to blasting, a siren will sound continuously, warning flags will be displayed, and certain roads in the vicinity of the blast site will be cordoned off.
- The Business Partner may be required to vacate certain areas during blasting activities and any instructions in this regard must be obeyed.
- Business Partner are not permitted to carry out any blasting activities without permission from the Debswana Contract Manager.
- Evacuations will be done as per communication sent from Blasting Department
- It is the responsibility of the Business Partner to ensure that all its employees vacate

8.14.13. Working Alone and Working in Remote Areas

- Business Partner should avoid having their employees working alone.
- Where a person is working alone on a task, he should have either visual contact or radio communications with other employees at all times.
- If continuous visual contact is not maintained, a regular communication check must be in place and a physical check must be done at least once every hour.
- All Business Partner working in remote areas such as slimes dam, Game Park, etc. shall always be required to have:
 - Fully equipped first aid box
 - Qualified first aider
 - Two-way communication e.g. radio, cell phone
 - Transport readily available on site
 - A supervisor or his designate on site

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8.14.14. Removal of Existing Structures

- Prior to removal of any part of any access walkway (floor or railing), a permit must be obtained from the Debswana representative.
- A substantial barricade with appropriate signs shall be erected at all approaches to the area where grating or handrails are to be removed.
- Any person working inside the barricaded area shall wear appropriate fall protection.
- The area below the intended opening that may be affected by overhead hazards shall be barricaded and sign-posted to prevent access.
- Machine guards of existing equipment may not be removed without authorisation of the Debswana representative

8.14.15. Confined Space Entry

- A confined space is any space that is not designed for continuous employee occupancy, is large enough and so configured that an employee can bodily enter, has limited or restricted means for entry or exit.
- Prior to entering any confined space, a permit must be obtained from the Debswana representative including by an Occupational Health Practitioner

8.14.16. Radiation Sources

- The locations of all existing radiation sources must have standard radiation warning signs.
- If a Business Partner has to perform work near a source he must liaise with the Debswana Contract manager to establish the precautions to be taken.
- Compliance to the Botswana Radiation Protection Act will have to be adhered to including licensing of the radiation source.

8.15. Environmental Management

8.15.1. General

- 8.15.1.1. The Business Partner is to reduce waste by re-using or recycling material wherever possible.
- 8.15.1.2. Adequate care shall be taken by the Business Partner to prevent pollution of the environment in any way whatsoever
- 8.15.1.3. All plant and machinery should be regularly serviced to reduce emissions. The Business Partner Operations Manager has the power to stop the Business Partner operating polluting vehicles.

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8.15.2. Hydrocarbon Management

- 8.15.2.1. No hydrocarbons to be drained into the ground by the Business Partner.
- Precautions need to be taken to ensure that oil spillages are contained.
 - In the event of oil spillage clean up kits need to be readily available with appropriate trained personnel from the relevant Business Partner.
 - Spillages from batch plants are to be avoided and when occurring, the concrete silt is to be trapped and prevented from polluting the environment.

8.15.3. Dust Management

- 8.15.3.1. Dust production from the work area must be minimised by regular watering. Temporary stockpiled material, which could be blown by the wind, must be covered. Total dust levels in the air should be maintained below 10 mg/m³.
- 8.15.3.2. Erosion control measures are to be practiced on site.
- 8.15.3.3. No open fires should be allowed on site

8.15.4. Vegetation Management

- 8.15.4.1. Unnecessary vegetation stripping shall be avoided:
- 8.15.4.2. The Business Partner shall remove as little vegetation as possible and only where shown on the scope. This will avoid unnecessary exposure of bare soil and will maintain vegetative screen.
- 8.15.4.3. Business Partner to protect and monitor large tree specimens. If trees are liable to be damaged by machinery, protective fencing should be erected around the tree(s), following the outer limit of the tree canopy. No vehicles should pass under nor should any storage be permitted under any part of the canopy of any retained tree.
- 8.15.4.4. The Business Partner shall not remove or damage any tree unless with prior approval of an environmental practitioner
- 8.15.4.5. The Business Partner shall be responsible for remedial action or like-for-like replacement should any trees be damaged, felled or removed (excepting those trees designated for removal). This will be at the Business Partner's own cost. If remedial action or replacements are required, the Business Partner must seek advice from a qualified landscape architect on how this should be done (i.e. which species to use, plant size, and planting method).
- 8.15.4.6. Business Partner shall protect and monitor large tree specimens. If trees are liable to be damaged by machinery, protective fencing should be erected around the tree(s), following the outer limit of the tree canopy. No vehicles should pass

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under, nor should any storage be permitted under any part of the canopy of any retained tree.

8.15.4.7. The Business Partner shall not fell or damage any tree unless specifically told to do so by the Debswana Contract Manager and in accordance with contract documentation. Financial penalties shall be imposed on the Business Partner for noncompliance (the penalty shall be the amount deemed necessary to reinstate all damage caused).

8.15.4.8. The Business Partner shall be responsible for remedial action or like-for-like replacement should any trees be damaged, felled or removed (excepting those trees designated for removal). This will be at the Business Partner's own cost. If remedial action or replacements are required, the Business Partner must seek advice from a qualified landscape architect on how this should be done (i.e. which species to use, plant size, and planting method).

8.15.4.9. The Business Partner shall be responsible for remedial action or like-for-like replacement should any trees be damaged, felled or removed (excepting those trees designated for removal). This will be at the Business Partner's own cost. If remedial action or replacements are required, the Business Partner must seek advice from a qualified landscape architect on how this should be done (i.e. which species to use, plant size, and planting method).

8.15.5. Soil Management

8.15.5.1. During site clearance, topsoil will be managed as per Debswana Topsoil Stripping Guideline. It should be stripped and stockpiled on site, at a predetermined area as indicated by the Client, for re-use later in the contract. It must be kept separate from sub-soils and it must be kept clear of builder's rubble and clean of fuels, lubricants and other contaminants. Stockpiles should be protected from storm water erosion, if necessary, with geotextile sheeting or seeding.

8.15.5.2. Re-vegetation and rehabilitation are to be done in areas where instructed to do so.

8.15.5.3. The Business Partner shall avoid import and export of soils to/from the site to minimise vehicle movements outside the site. Importing soils increases construction costs and is not environmentally sustainable

8.15.5.4. Where gravel and soil are transported by truck on and off the site, the loads are appropriately covered to prevent spillage and dust generation.

8.15.5.5. All building rubble is to be disposed of using the mine's dedicated disposal site.

8.15.6. Procedure for Granting of Borrow Pits

8.15.6.1. When a Business Partner needs to extract ground or filling material from the Mines registered borrow pits for construction of mine infrastructure, the Business

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Partner shall obtain prior permission from the Debswana Contract Manager in writing.

8.15.6.2. Permission to open or extract from borrow pits should be obtained from the relevant authorities and they should not be opened until permission is granted.

8.15.6.3. Borrow pits shall strictly be operated in accordance with mine procedures.

8.15.6.4. Under no circumstance will the dumping of any type of material be allowed at borrow pits or any area not approved by the Debswana Contract Manager.

8.16. Social Performance

8.16.1. There are certain fundamentals that apply to all Business Partner irrespective of the severity of the risks or impacts. These include:

- Social risk and impact management.
- Stakeholder engagement.
- Commitments management.
- Grievance and incident management.

8.16.2. The extent of implementation of the other requirements will depend on the context, in particular the risks and impact.

8.16.3. All discussions with the community should be made through the CA (Corporate Affairs) and Debswana Representative.

9. PERFORMANCE MONITORING

9.1. Non-Conformances and Rectification

9.1.1. Debswana reserves the right to inspect the Business Partner work area at any time and without prior notice to ensure compliance to legal requirements and Debswana SHE and Social Performance procedures and standards.

9.1.2. The Debswana representative, the Safety and Sustainable Development Department, and the Corporate Affairs Department (Social Performance) have the authority to issue a non-conformance notice to any Business Partner not complying with the SHE and Social Performance requirements on the site.

9.1.3. Any expense incurred due to non-conformances shall be for the Business Partner's account.

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9.1.4. Any person has the authority to stop work if there is a life-threatening situation and/or the danger of substantial material loss/damage and should immediately inform the Debswana representative.

9.1.5. Authority to resume work after a stoppage caused by a SHE and/or Social Performance violation is the sole responsibility of the Debswana representative.

9.2. Inspections and Observations

9.2.1. Inspections and Planned Task Observations as required must be conducted by competent persons and records kept thereof.

9.2.2. The Business Partner will have to cooperate with the Behaviour-Based Safety programs that are implemented as part of the Debswana SHE and Social Performance management system.

9.3. Registers, Checklists and Site Instruction Books

9.3.1. Registers and checklists must be kept for the following categories

- Mobile Equipment and LDV inspections
- Tools Inspections
- Equipment Inspections
- Regulatory Inspections
- PPE Inspections
- Registers can be obtained from the SHE department.

9.3.2. Business Partner are also required to maintain a site instruction book on the construction site to facilitate formal communication and issuance of instructions by Debswana representatives.

9.3.3. The format can be obtained from the Debswana Representative.

9.4. Incident Reporting

9.4.1. It is important that incidents (including social incidents, complaints or grievances) and near-hits are promptly reported and actioned upon so that deviations are corrected and recurrence can be prevented.

9.4.2. An incident is the realisation of a Safety, Health or Environmental risk – an unwanted event which caused adverse consequences in any of the following categories:

- Safety: injury or acute illness
- Occupational Health: deterioration of health due to repetitive exposure to health hazards

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- Environment: spillages, air pollution, harm to animals and plants, wastage of energy and water, uncontrolled waste
 - Damage and Loss: property damage, product loss or loss of productive time
 - A near hit is. any occurrence or a situation which potentially could have caused adverse consequences to people, the environment, property, reputation or a combination of these, but which did not. Near hits include all substandard behaviours and substandard conditions observed which may lead to the occurrence of an incident/accident. It represents an opportunity to learn and improve at-risk condition and or behaviour
 - A High-Potential incident is the uncontrolled release of energy or the integrity failure of critical control with the potential to result in a fatality or multiple fatalities
- 9.4.3. All incidents (including near-hit incidents) must be reported to the Debswana representative and Safety Department as per the Debswana procedure and on the prescribed form and Isometrix system
- 9.4.4. Incidents must be reported within following timelines as guided by the site Incident reporting procedure:
- For all incidents: email notification to be sent within 2 hours (where possible) to the SHE department
 - For serious incidents (Lost Time Injuries, Restricted Work Injuries and High-Potential Incidents): An Incident Notification flyer must be sent within 24 hours to the SHE department. These incidents must be investigated with the Debswana ICAM incident investigation method.
 - Incident Investigation Summary flyer to be sent within 1 day or within 5 days for incidents that required a full ICAM investigation
- 9.4.5. In the event of a serious incident where a person has died or was injured to such an extent that he is unlikely to continue with his normal duties on the following shift, the incident site shall not be disturbed without consent of the Debswana Representative General Manager and /or Department of Mines; provided that such action may be taken as is necessary to prevent a further accident, to remove the injured, or to rescue persons from danger.
- 9.4.6. The activities may not continue until reasonably agreed upon remedial measures are in place to prevent a recurrence of the incident.
- 9.4.7. The Business Partner shall not issue any communication to the public on incidents that occur without approval from the Debswana representation General Manager.

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- 9.4.8. All injury on duty incidents shall be reported to the labour office as per the provisions Workers Compensation Act (WCA) after liaising with S&SD and proof shall be submitted to S&SD
- 9.4.9. Where there has been an injury (FAI MTI LTI RWI) the Business Partner rep is to liaise with the Debswana (Occupational Health Medicine Practitioner) OHMP to ensure that impairment ratings are done for the injured within 6 months of injury occurring or at such time recommended by OHMP. The Business Partner shall submit to the labour commissioner the documentation for finalising / closure of the WCA process

9.5. Reporting to the Department of Mines

- 9.5.1. The following incidents shall be reported to the Department of Mines through the office of the General Manager:
- Injuries resulting in the death of a person
 - where a person becomes unconscious or is incapacitated for 48 hours from heatstroke, heat exhaustion, electric shock or burns, the inhalation of blasting fumes or the inhalation of any poisonous gas or fumes.
 - where the injuries sustained by a person are so serious that it is possible they may prove fatal.
 - Any accident in which any person sustains serious bodily harm or is incapacitated for more than three days, excluding the day of the incident but including weekends or official holidays.
 - Dangerous occurrences must be reported to the Department of Mines within 24 hours through the office of the General Manager:
- 9.5.2. The fracture or failure of any part of any machinery, whereby the safety of any persons has been or may have been endangered.

9.6. Incident Investigation

- 9.6.1. All incidents will be investigated as per the Debswana Learning from Incident procedures.
- 9.6.2. The Business Partner will be required to avail his management and employees to the investigating team and to provide all information requested during the investigation.
- 9.6.3. The Business Partner must ensure that the preventative/corrective actions recommended by the investigating team are actioned within the quickest time reasonably possible.

9.7. Audits

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- 9.7.1. Business Partner are expected to cooperate and comply with any SHE and Social Performance audits (internal and external audits).

9.8. Reporting

- 9.8.1. The Business Partner is to submit to the Debswana representative and SHE department a comprehensive monthly SHE report ("labour return") within the first week of the cut-off date as determined by Debswana, which shall contain at least the following information:

- Hours worked for the previous month and the contract to date (employees and sub-Business Partner)
- Brief description of incidents (accidents, property damage, near-hits, complaints, grievances) for the month.
- Manpower on site
- Medical surveillance report
- Non-conformances issued or received
- Housekeeping status
- Forthcoming hazardous activities
- Training done for the month
- Training program for the month
- Safety inspection done for the month (to include all legally required inspections such as cranes, lifting equipment and pressure vessels, inspections of First Aid equipment, Fire Fighting Equipment, critical equipment, Safety Representative etc.)
- General issues
- Social Performance reporting information as required under the social management or community plans (such as CSI spend)

- 9.8.2. The return must be submitted on a form prescribed by Debswana.

10. PROJECT CLOSURE

10.1. Project closure

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- 10.1.1. At the end of the project the Business Partner will have a close-out meeting with the Debswana Contract Manager to evaluate project statistics, identify lessons learnt and hand over the contract SHE file in an electronic format.
- 10.1.2. All persons that work for the Business Partner must undergo an exit medical examination to be conducted by a Debswana medical practitioner (or a medical practitioner authorised by Debswana) who will issue an Exit Certificate. The certificates must be included in the SHEP file.
- 10.1.3. The Business Partner will be required to demonstrate that all personnel injured on duty have been compensated as per the WCA by submitting to (Occupational Medical Practitioner (OMP) for sign off.

10.2. Site clean-up and/or rehabilitation.

- 10.2.1. At the end of the project, the project site must be cleaned up and any unwanted material and scrap must be removed.
- 10.2.2. On completion of the project the camp shall be suitably decommissioned and all construction debris, wastes, scrap etc. removed. As a rule, the construction camp must be returned to the state in which it was found and the landscape fully reinstated unless otherwise directed by the Debswana representative
- 10.2.3. All the areas where pollution or contamination occurred during the project implementation must be rehabilitated
- 10.2.4. An Environmental Official from the mine must verify the adequacy of clean-up and/or rehabilitation.
- 10.2.5. If clean-up was not done or properly done, the cost of cleaning the site shall be back-charged to the Business Partner.
- 10.2.6. A decommissioning certificate must be signed by environmental personnel before the final payments can be made to the Business Partner. The certificate must be included in the SHE file

Note: Pollution and or contamination must be prevented and if it happens it should be dealt with immediately and not wait for the project to complete

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APPENDIX A: REFERENCED DOCUMENTS

- Debswana Technical Standards
- Debswana Safety and Sustainable Development Standards
- Debswana Occupational Health and Safety Agreement
- Botswana Mines, Works, Quarries and Machinery Act (MWQM Act)
- ISO 45001 – Occupational Safety and Health Management System
- ISO 14001– Environmental Management System
- Debswana Social Performance Policy
- Debswana Citizen Economic Empowerment Policy (CEEP)
- Anglo Social Way
- Debswana contractor management standard

APPENDIX B: RECORD OF AMENDMENTS

Issue No.	Effective Date	Date Last Revised	Amendment Details
1		13/12/2012	New document
2		08/03/2021	Clarifications
3		14/10/2017	Number of SHE officers changed from 1 per 50 employees to 1 per 25 employees
4		31/11/2021	Adapted to new Debswana standards and ISO 45001 management system Formatted in Debswana standards format
5	01/10/2024	18/10/2024	Incorporated the new Debswana technical standards Incorporated requirements from the Occupational Health requirements

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APPENDIX C: BUSINESS PARTNER CATEGORIES AND MINIMUM REQUIREMENTS

Description (duration, risk, exposure)	Examples	SHE Pre –Requirements (SHE plan and SHE File)	SHE File Post - Requirements
Category 1 (Low Risk)	Visitors, Delivery vehicle drivers, Consultants and trainers	<ul style="list-style-type: none"> General Induction, PPE Compliance and Medical Exams For delivery vehicles: Relevant permits and licenses, completion of delivery vehicle checklists as per the applicable Mine Delivery Vehicle Procedures 	<ul style="list-style-type: none"> N/A
Category 2 (Low Risk) Work that involves hazards such that if an accident occurs the likely outcome is a minor injury and/or negligible environmental, public perception or regulatory impacts.	Less than 1-month jobs not involving any of the Technical Standards and having 10 employees or less.	<ul style="list-style-type: none"> Business Partner's SHE policy and Social Performance policy or COMBINED HIV/AIDS policy Proof of worker's compensation insurance for all workers (citizen and non-citizen workers) Proof of medical insurance for employees Evacuation insurance for repatriation to country of origin after an injury. The SHE and Social risk assessment for the scope of works Register of PPE that will be required Equipment maintenance records and inspection records. List of personnel and their job titles, organogram Legal and first aider appointments Medical examinations Training records 	<ul style="list-style-type: none"> Records of SHE talks. Records of PPE provided

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Description (duration, risk, exposure)	Examples	SHE Pre –Requirements (SHE plan and SHE File)	SHE File Post - Requirements
		<ul style="list-style-type: none"> Equipment registers and Debswana's fit-for-use inspection register Permits and licenses as applicable SHE Representative needed General and site-specific induction Chemical inventory and MSDs briefings where applicable 	
Category 3 (Moderate Risk) Work that involves hazards such that if an accident occurs the likely outcome is a temporary disability (e.g., broken bones, muscle or ligament damage) and/or limited and reversible environmental impacts, regulatory non-compliance and negative public perception.	1–6 months jobs not involving any of the Technical Standards and having 10–25 employees	<ul style="list-style-type: none"> Business Partner's SHE policy and Social Performance policy or COMBINED HIV/AIDS policy Proof of worker's compensation insurance for all workers (Botswana and expatriate workers) Proof of medical insurance for employees Evacuation insurance for repatriation to country of origin after an injury. Environmental aspects and impacts of all activities The SHE and Social risk assessment for the scope of works Safe Work Procedures for critical tasks Register of PPE that will be required and records Equipment maintenance plan and inspection plan and associated records List of personnel and their job titles, organogram Legal and internal appointments as applicable Medical examinations certificates 	<ul style="list-style-type: none"> Training plan and records Records of SHE talks, SHE meetings etc. Equipment registers and Debswana's fit-for-use inspection letters

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Description (duration, risk, exposure)	Examples	SHE Pre –Requirements (SHE plan and SHE File)	SHE File Post - Requirements
		<ul style="list-style-type: none"> Equipment register and Debswana's fit-for-use inspection register Records of inspections, observations and audits Permits and licenses as required SHE Officer required General and site-specific induction Chemical inventory and MSDs briefings where applicable Competency profile of appointed persons (CVs, certified copies of qualifications, copies of driver licenses, etc.) Emergency preparedness Action Plan Waste Management Plan 	
Category (Significant) 4	Jobs Over 6 months, invoking any of the Technical Standards	<ul style="list-style-type: none"> Business Partner's SHE policy and Social Performance policy or COMBINED HIV/AIDS policy Proof of worker's compensation insurance for all workers (Botswana and expatriate workers) Proof of medical insurance for employees Evacuation insurance for repatriation to country of origin after an injury. Social and community aspects and impacts of all relevant activities Environmental aspects and impacts of all activities The SHE and Social risk assessment for the scope of works Safe Work Procedures for critical tasks (SOPs ad JRAs) Register of PPE that will be required and records 	<ul style="list-style-type: none"> Records of training Records of inspections, observations and audits Records of SHE talks, SHE meetings etc. Training records Incident and grievance / complaint records Job Risk Analysis and Pre-Task Risk Assessments

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Description (duration, risk, exposure)	Examples	SHE Pre –Requirements (SHE plan and SHE File)	SHE File Post - Requirements
Work that involves hazards such that if an accident occurs the likely outcome is a fatality or permanent disability and/or widespread or long-term environmental impacts, legal liability and significant negative public perception.		<ul style="list-style-type: none"> Equipment maintenance, inspection plan and associated records Regulatory and Operational Equipment inspection List of personnel and their job titles, organogram Legal and internal appointments as applicable Medical examinations certificates Training plan and applicable records Permits and license Equipment registers and self-check Debswana's fit-for-use inspection register Permits and licenses and other authorisations as required SHE Officer required General and site-specific induction Social and community aspects and impacts of all relevant activities Competency profile of appointed persons (CVs, certified copies of qualifications, copies of driver licenses, etc.) Emergency preparedness Action Plan Waste Management Plan 	<ul style="list-style-type: none"> Records of inspections, observations and audits Records of SHE talks, SHE meetings etc. Discussions of community interactions and Social Performance issues
NB: Where the Business Partner is working under an existing Business Partner (Sub-Business Partner) or as part of Debswana departments this requirement must be included in the existing SHE File and submitted for approval by A SHE Official. Trainers, visitors and Consultants are exempted from requirements except for Medical Exams, PPE compliance and general induction			

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APPENDIX D: DEBSWANA SAFETY AND SUSTAINABLE DEVELOPMENT POLICY

Refer to document: GSD-SSD-01

APPENDIX E - TEMPLATE OF A SHE PLAN

SAFETY HEALTH AND ENVIRONMENT

PROJECT SHE PLAN

Project Title: INSERT

Project Number: INSERT

Business Partner Name:
INSERT

Name	Signature	Date
Prepared By:	INSERT	
Checked By:	INSERT	
Approved By:	INSERT	

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The SHE Plan is intended to provide detailed requirements for Debswana project specific SHE aspects for Business Partner. Once completed the Business Partner should be able to provide clear statements of their work plan to organize, perform, and execute the SHE responsibilities of the project. It identifies the processes and procedures for ensuring that activities, including engineering, design, design, construction and management are undertaken safely.

The primary purpose of this Plan is to ensure proper management of project SHE risks. The designated Debswana Representative or Debswana SHE Official/Manager is responsible for determining the level of SHE risk associated with the scope of work detailed in the contract terms. Based on the level of risk, the SHE Official in collaboration with the Debswana Representative shall establish the SHE arrangements to be documented within the project SHE Plan guided by Business Partner categorisation table.

1. Business Partner's SHE policy and Social Performance policy or COMBINED

- i. The following SHE Policies will be developed, displayed and communicated throughout the project;
 - The Site SHE/ECOHHS Policy
 - The Debswana Drug and Alcohol Policy
 - Business Partner HIV Policy
 - Any other project specific Policies as required.
- ii. Policies will be prominently displayed on noticeboards and will be brought to the attention of all staff during inductions.

2. Proof of worker's compensation insurance for all workers (Botswana and expatriate workers) – To be included in the SHE File

3. Proof of medical insurance for employees – To be included in the SHE File

4. Evacuation insurance for repatriation to country of origin after an injury – To be included in the SHE File

5. SHE, Social and community aspects/hazards and impacts/risks of all relevant activities

The hazard identification and risk assessment process is applied to both routine and non-routine activities. It covers identification of hazards, assessments of risks and determination of the necessary controls.

The Business Partner detailed risk assessment shall be documented covering all Business Partner Facilities, Activities, Processes, Equipment and Services that the

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Business Partner interacts with. Debswana templates for carrying Risk Assessments are available and can be sourced from the Debswana Representative. Determination of Controls shall be guided by the hierarchy of Controls:

- **Elimination** – Where possible, remove the hazard or the need to complete tasks at risk (e.g., eliminating toxic substances, or hazardous equipment, or processes that are not necessary).
- **Substitution** – Complete the task in a less hazardous location or manner (e.g., building as much of a structure on the ground in preference to working at height).
- **Engineered Solutions** – Engineer or redesign the structure or equipment to reduce the hazard involved in the task (e.g., move valves from height to a lower level for operation or install remote valve operation devices).
- **Administration** – Establish policies, procedures, and work practices to reduce employees' exposure to risk (e.g., provide training, use warning signs, and reduce time spent in noisy areas).
- **Personal Protective Equipment (PPE)** – The provision of personal protective equipment does not eliminate the hazard but only shields the individual from it. Such action will have to be coupled with training in the correct use of the equipment. PPE should be used only as a last resort

6. Safe Work Procedures/Safe Operating Procedure for critical tasks

Business Partner shall develop Safe Work Procedures/Safe Operating Procedure for critical tasks.

A Safe Operating Procedure (SOP) is a document which describes how work is to be carried out in a safe and standardised process. SOPs outline the hazards, risks and associated controls measures to be applied to ensure the task/activity is conducted in a way to reduce the risk of injury.

SOPs provide information to assist workers to perform tasks safely. They include:

- Describing how the work is carried out
- Identifying the work activities assessed as having SHE risks
- Stating what the SHE risks are
- Describing the control measures that will be applied to the work activities
- Describing how measures will be implemented to undertake the work in a safe and environmentally sound manner
- Outlines the legislation, standards and codes to be complied with and

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- Describing the equipment used in the work, the qualifications of the personnel undertaking the work and the training required to undertake the work in a safe manner.

7. Register of PPE that will be required and records - To be included in the SHE File

8. Equipment maintenance, inspection plan and associated records

- Workplace Inspections are carried out to ensure all work areas are kept free from hazards or potential hazards that may lead to injury, illness, near miss, property damage or adverse environmental impact.
- Business Partner are expected develop an Equipment and Workplace inspection plan in line with the risk and equipment used on site.
- All equipment to be used shall be inspected by a Debswana Official or as required by regulatory requirements prior to use. Business Partner shall make arrangements for such inspections.
- Inspection templates are available from Debswana for most equipment and workplaces. Where such do not exist Business Partner shall develop an inspection template in line with sites document control protocols.
- Equipment requiring regulatory inspections shall be inspected at appropriate intervals and up to date records maintained in the Business Partner SHE File. Such include as examples; pressurised vessels and lifting equipment.
- Business Partner shall also indicate the maintenance plans for all equipment for equipment on site. Up to date records for maintenance shall be kept in the SHE file.
- An up-to-date list of equipment shall be maintained.

9. List of personnel and their job titles, organogram

- Business Partner shall maintain their SHE File a list of personnel their job titles and a Business Partner organogram.
- The Organogram shall detail appointable position and regulation under which such people
- shall be appointed in line with applicable legislation
- Competency profile of appointed persons (CVs, certified copies of qualifications, copies of driver licenses, etc.)

10. Legal and internal appointments as applicable - To be included in the SHE File using Debswana templates

11. Medical examinations certificates - To be included in the SHE File – To be done by Debswana Occupational Health Dr or approved Service Provider.

12. Training plan and applicable records

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Providing Safety Health and Environmental information and training helps you to:

- Ensure that people who work for you know how to work safely and without risks to health.
- Develop a positive health and safety culture, where safe and healthy and Environmental working becomes second nature to everyone.
- Meet your legal duty to protect the health and safety of your employees
- Meet Environmental and Social Performance requirements

Business Partner shall develop a training plan and implement it in line with SHE risks that employees will be exposed. The following guidelines shall be considered in the development of training needs, training plans and implementation of train.

- New recruits need basic induction training into how to work safely, including arrangements for first aid, fire and evacuation.
- People changing jobs or taking on extra responsibilities need to know about any new health and safety implications.
- Young employees are particularly vulnerable to accidents, and you need to pay particular attention to their needs, so their training should be a priority. It is also important that new, inexperienced or young employees are adequately supervised.
- Employee representatives or safety representatives will require training that reflects their responsibilities.
- Some people's skills may need updating by refresher training.
- An up-to-date record of implementation of training shall be maintained.

13. Communication

A Business Partner shall develop and Communication plan to be implemented using formal arrangements such as meetings, forums, and a communications network to transmit and share SHE information.

- These would include:
- Debswana and Business Partner progress meetings
- Scheduled SHE meetings
- Tool box talk meetings
- Safety stand downs -

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- A stand down is carried out by stopping the relevant work and gathering workers for a discussion.
 - A safety stand down will be undertaken in response to any SHE related issue deemed appropriate by the project SHE Manager in conjunction with the Project Manager.
 - SHE notice boards - Notice boards will have the Debswana and Business Partner SHE Policy statements, SHE objectives/targets, SHE performance, Emergency numbers and actions as well as any other SHE topic that relates to the project.
- SHE notice boards are restricted to SHE information and topics only

14. Legal Register, Permits and licenses

The Business Partner shall

- Develop legal register of applicable regulations and associated clauses for the Business Partner activities
- Identify and review legal and other requirements relevant to identified impacts and their implications on the proposed Business Partner activities
- High-level outline of applicable project permitting processes and likely time, resources requirements.
- Develop a schedule for obtaining the necessary approvals and a summary of the process for approval;
- Develop an action plan required to close out identified gaps

15. Site specific induction – The Business Partner shall develop an induction plan covering as a guide

Facilities (as appropriate)	The Organisation	Policies, Systems and Procedures	Personal Development
<ul style="list-style-type: none"> ▪ Car parking ▪ Kitchen/canteen facilities ▪ Fire extinguishers ▪ First aid boxes 	<ul style="list-style-type: none"> ▪ What we do? ▪ History of the organisation and future plans 	<ul style="list-style-type: none"> ▪ Safety and Health Procedures ▪ Codes of Practice ▪ Environmental awareness 	<ul style="list-style-type: none"> ▪ Training ▪ Mentoring, where appropriate

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<ul style="list-style-type: none"> Health and safety notice boards procedures Utilities, e.g. lighting, heating, water Access to buildings, security Notice boards Computer system, internet access Photocopier Toilets Smoking areas 	<ul style="list-style-type: none"> Organisational structure Other aspects of the organisation, as relevant Products/services Significant customers Where/How to find more SHE information 		<ul style="list-style-type: none"> New Employee Programme
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16. Emergency preparedness Action Plan

The Business Partner shall

- Identify possible emergencies associated with the Business Partner activities and activities around their site through the risk assessment process.
- Develop an end to end emergency response plan (from scene of incident to recovery) for all emergencies including crisis situations as identified in the risk assessment;
- Develop a program for testing the effectiveness of emergency controls on site.

17. Traffic Management Plan

The operation of workplace transport vehicles and equipment is among the highest risks on construction sites. To minimize this risk a project specific Traffic Management Plan must be created.

This Plan is to include:

- Design and planning for traffic/pedestrian segregation on site.
- Provisions to manage and change traffic routing during project progression.
- Maintenance programs/schedules for routine vehicle/plant inspections.

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- Driver and Traffic Flag persons Training
- Signage required
- Any other traffic management concern, topic or issue as dictated by the scope of work.

18. Waste Management Plan

The waste management plan should cover the following

- Specify who is responsible for managing waste on site.
- Estimate the waste types and amounts involved.
- Set targets for reducing the amount of each waste sent to landfill.
- Describe recycling/reuse methods for each material.
- Identify the waste destinations and transport modes, including what materials are being segregated on site for reuse or recycling.
- Track progress and how the reporting will be done
- Describe special measures for material use and handling.
- Describe communication and training to support and encourage participation from everyone on site

19. Monitoring and Reporting

- Two KPI monitoring systems shall utilised for Business Partner SHE information and analysis purposes - Leading and Lagging indicators.
- Leading indicators/monitoring measures compliance with standards, regulations and achievement of objectives through audits, inspections and reviews.
- Lagging indicators/monitoring measures accident rates, incident reports, hazard reports and non-conformance reports.
- The results of all indicators will be organized, charted and communicated at the regularly scheduled progress meetings, on weekly and monthly SHE reports.

20. Project Close out

- At the end of the product, the project site, the camping site and any other site that was directly under the control of the project or its Business Partner must be cleaned up and rehabilitated. All areas where pollution or contamination occurred during the project must be rehabilitated and authorized

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environmental personnel must verify the adequacy of clean-up and/or rehabilitation.

- A decommissioning certificate must be developed with a provision for environmental personnel to sign before the final payments can be made to the Business Partner.
- Note: Pollution and or contamination must be prevented and if it happens it should be dealt with immediately and not wait for the project to complete.
- The Business Partner shall detail a Project close out plan covering but not limited to;
 - Demobilisation and Rehabilitation where required
 - Submission of the Electronic version of the SHE File to the Debswana Representative

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**APPENDIX F: SOCIAL PERFORMANCE MANAGEMENT PLAN GUIDELINE – TO BE COMPLETED
BY SOCIALLY MATERIAL CONTRACTS**

Social Management Plan						
Risk / Impact						
Issue/Impact: Phase	Lifecycle Phase during which issue/impact occurs				Operation	
Duration of impact if unmanaged	Temporary	Short-term (2-5 years)	Long-term (5-25 years)	Permanent		
Geographical Scope of Impact	Zones of Influence Communities	Sub-District	District	National		
Potential Impacts (negative)						
Management Objectives						
Key Affected Stakeholders						
Management Actions	Performance Target	Person or Team Responsible: Organization Individual	Timelines: Implementation Interim milestones Completion	Key Performance Indicators	Monitoring & Evaluation: Method, Frequency/ Timing, Responsibility	Required Resources: Human Financial Material In-kind