QEHS PLAN & PROCEDURE

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1. SCOPE

This R K Insulation QEH&S Plan& Procedure shall encompass:

- R K Insulation Employees
- All Subcontractors
- All lower tier subcontractors
- Vendors and suppliers as defined within the work scope.

This R K Insulation QEHS Plan & Procedure applies to:

- All Branch Offices.
- All Temporary Project Site Offices.
- All Material Storage Facilities.

2. TERMS AND DEFINITIONS

- QEH&S Plan & Procedure is Quality, Environment, Health& Safety Plan.
- BO is Branch offices in other cities in India or Abroad
- TPSO is Temporary Project Site Offices set up at various clients' premises to execute Projects.

3. **REFERENCES**

Space Matrix Design Consultants Pvt. Ltdshall comply with the following regulations and standards:

- ISO 9001: 2008 Quality Management System.
- OHSAS 18001: 2007 Occupational Health and Safety Assessment Series.
- ISO 14001 : 2004 Environmental Management System
- ANSI, BS or Clients approved standards for Personal Protective Equipment (PPE)

4. METHODOLOGY

The R K Insulation QEH&S Policy is the primary document of theQEH&S Plan& Procedure, for this document provides the commitment of management by leadership. The QEH&S Plan by describing the production of associated plans and procedures explains the mechanism for achievement of the R K Insulation Engineers &Contractors goals utilizing a pro-active risk based process.

5. PROJECT QEH&S COMMITMENT POLICY

5.1 PROJECT DISTRIBUTION AND PUBLICIZING EH&S POLICY,

The Project QEH&S Commitment Policy document as described at Annexure 01 of the R K Insulation QEH&S Plan & Procedure shall be prominently displayed in all Branch Offices, Temporary Project Site Offices and Head Office, meeting rooms, senior management offices, and all engineering offices.

6. QEH&S MANAGEMENT SYSTEM

The principal of As Low as Reasonably Practicable (ALARP) is recognized by R K Insulation Engineers & ContractorsManagement and shall be adopted by R K Insulation Engineers & ContractorsManagement during design, procurement and construction, in order to minimize the risk of an occurrence.

R K Insulation Engineers & ContractorsManagement has the concept that all accidents are preventable for which R K Insulation Engineers & ContractorsManagement shall adopt a robust pro-active safety management program in order to achieve ZERO accident/incident performance.

The R K Insulation Engineers & ContractorsQEH&S Plan is based on the 10 principals these principal philosophies are:

- Encourage Positive Behavior.
- Plan, Organise and Communicate.
- Apply Standards and Procedures.
- Develop Competency and Well-being.
- Manage Subcontractors and External Relations.
- Manage Hazards and Risks.
- Manage Change.
- Manage Incident Response.
- Learn from Experience.
- Audit and Review.

6.1 R K INSUATION EXPECTATION AND GOAL FROM THIS APPROACH IS:

- Zero (0) injuries to all who work for R K Insulation Engineers & Contractors
- Zero (0) accidents in the execution of the PROJECT
- Zero (0) environmental cases or Loss of Primary Containment (LOPC)
- Zero (0) Motor Vehicle Incident (MVI)

7. ENCOURAGE POSITIVE BEHAVIOUR

R K Insulation Engineers & ContractorsDirectors assumes ultimate accountability forQEH&S Plan and Management System effective implementation.

R K Insulation Engineers & ContractorsManagement recognizes positive behavior is driven from the TOP DOWN. It shall be an overriding principal of R K Insulation Engineers & ContractorsQEH&S Management that the goals of R K Insulation Engineers & Contractorsto achieve ZERO Accident/Incident performance shall be reflected in every aspect of all functions and work activities

7.1 R K INSULATION ENGINEERS & CONTRACTORS SHALL ACHIEVE THIS GOAL BY:

- Minimization of EH&S risks to personnel.
- Maximize staff involvement in developing and implementing theQEH&S Plan utilizing a strong management system and facilitate QEH&S training through participation.
- Implement a People Based Safety program, providing ownership and accountability of QEH&S by employees and workers.
- Use well-defined methods, procedures, instructions and guidance for achieving the above.
- Provide incentives to encourage strong QEH&S ownership performance.

7.2 QEH&S COMMITMENT.

The Project QEH&S Commitment Policy is integral to this document and shall be prominently displayed at locations where the work is performed as described in Annexure 01.

7.3 MOTIVATION AND INCENTIVES

R K Insulation Engineers & ContractorsManagement recognises that positive behavior in itself is difficult to sustain without encouragement and incentivesR K Insulation Engineers & Contractorsalso recognise that there is a clear requirement for these encouragements and incentives to reflect the literacy and activity of the employees and personals to which they are directed.

R K Insulation Engineers & Contractorsshall encourage the commitment of all subcontractors, Suppliers to the achievement of ZERO Accident/Incident performance at all levels of management.

7.4 POSITIVE EH&S INFORMATION.

At all locations where work is executed, QEH&S information shall be tailored to the type of work executed in consideration of the risks identified at the location of the work performance.

In particular, QEH&S shall be the first point of discussion at all formal meetings within R K Insulation Engineers & ContractorsTopics for the discussion will be based on identification of monthly QEHS Key Issues based on schedule of activities.

7.5 QEH&S SELF ASSESSMENT

R K Insulation Engineers & Contractorsshall incorporate a method of check and balance through selfassessment to ensure that the 10 Key Elements of the R K Insulation Engineers &ContractorsQEH&S Plan are adhered to and opportunities to improve identified, assessed and documented.

The assessment shall be the 10 Key Elements of the R K Insulation Engineers & ContractorsQEH&S Plan.

- Encourage positive behavior.
- Plan, Organise and Communicate.
- Apply Standards and Procedures.
- Development of competence and well-being.
- Management of contractors and external relations.
- Management of hazards and risk.
- Manage Change.
- Manage Incident Response.
- Learn from Experience.
- Audit & Review programs.

Assessment shall be by way of a set of pre-determined questions relative to the discipline activity, relative to theR K Insulation Engineers & ContractorsQEH&S Plan.

7.6 ORGANISATION

Appendix 1

7.6.1 Organisation Responsible Personnel

The R K Insulation Engineers &Contractorsmanagement shall organize resource and empower QEH&S organisation to ensure implementation of the R K Insulation Engineers & ContractorsQEH&S Plan& Procedure.

QEH&S is an integrated responsibility crossing all department boundaries. The R K Insulation Engineers & ContractorsManagement is responsible for developing criteria that will be implemented and cascaded down by line management, the subcontractors and through contract language.

Of key importance is that the R K Insulation Engineers & ContractorsQEH&S Management and organization shall have direct control and responsibility for these key EH&S functions.

- The R K Insulation Engineers & ContractorsQEH&S Management shall nominate a senior QEH&S Manager on the project reporting directly to the R K Insulation Engineers & Contractors Project Co-Ordinator
- Trainings of Space Matrix DCPL personnel shall be conducted and facilitated by the R K Insulation Engineers & Contractorsprior to deployment to Clients Site. Shall conduct prestart indoctrination in a dedicated training facility.

7.7 SPACE MATRIX DCPL QEH&S ORGANIZATION

7.7.1 QEH&S Organization.

7.7.1.1 Project Manager

The Project Manager shall:

- Assure that R K Insulation Engineers &ContractorsQEH&S Plan is implemented throughout all phases of the Project.
- Assure that project management personnel take ownership of the R K Insulation Engineers &ContractorsQEH&S Plan.
- Assure that suitably competent QEH&S personnel are assigned to the project
- Assure that sufficient resources, human and material are allocated for all QEH&S requirements.
- Monitor the Project QEH&S Performances.

7.7.1.2 PROJECT QEH&S Manager

The PROJECTQEHS Manager reports directly to the Project Manager The Space Matrix DCPL PROJECT QEHS Manager shall:

- Provide QEH&S guidance to the Project Manager and senior level management
- Assume the overall responsibility and accountability for the integration of the company QEH&S Plan and management system and documentation
- Provide strategic direction to the Project QEH&S program and QEH&S teams
- Manage and co-ordinate the preparation and subsequent review of the Project QEH&S Plan.
- Verify that QEH&S personnel assigned to the Project are suitably qualified by education, training, competence, and experience in the type of work involved in this Project

7.7.2 <u>Responsibilities</u>

Responsibilities are as follows:

Project ManagerShall :

- Assure that QEH&S Management System is implemented throughout all phases of the Project
- Assist the Project Manager in assuring that suitably competent QEH&S personnel are assigned to the Project
- Assist the Project Manager in assuring that sufficient resources, human and material are allocated for all QEH&S requirements
- Assist the Project Manager in monitoring the Project QEH&S Performances center wise
- Ensure that all local applicable laws and regulations are made available to the Project QEHS Personnel.

Project QEH&S Manager shall:

- Implement Project QEH&S Management system and QEH&S Plan.
- Provide QEH&S guidance to the Project Manager and senior level management
- Ensure that all local applicable laws and regulations are made available to the Project QEHS Personnel.
- Evaluate and manage all changes as relating to QEH&S issues and documents centerwise
- Supervise Project QEH&S reviews performed center-wise
- Reduce risk to ALARP.

7.7.3 <u>QEH&S Supervisor/Officer</u>

The QEH&S Officer/Supervisor reports to the Project QEH&S Manager.

Roles and responsibilities:

- Participate in monitoring the QEH&S activities including auditing, sampling and inspection.
- Inspect the construction area daily
- Participate in the investigation of all incidents, accidents and near misses.
- Take action and report immediately to the Project QEH&S Manager in case of dangerous actions and/or situations.
- Advise in the field for any problem related to QEH&S for all the personnel.
- To participate to the toolbox meeting held by the foremen and support them during this activity
- To actively participate in the investigation of all incidents accidents and near messes
- To ensure that Fire Fighting and Safety equipment is regularly inspected and serviced.

7.7.4 <u>Superintendents and Supervisors</u>

Roles and responsibilities:

- Participate in the scheduled work area audits or inspections and implement and document required corrective actions.
- Be familiar with and enforce QEH&S rules, regulations, and laws and document all actions taken to ensure compliance with those.

- Attend, actively participate in, and consistently demonstrate strong leadership at Toolbox Safety Meetings.
- Actively participate in pre-job planning activities. Specifically Job Hazard Analysis and Job Safety Analysis.
- Be thoroughly familiar with this procedure and with their individual responsibilities regarding its implementation and enforcement.
- Supervisor shall ensure that only competent persons are assigned work tasks. This includes confirming and ensuring the worker has the skills, physique and knowledge to safely execute the work task.

7.7.5 <u>Employee</u>

Roles and responsibilities:

- Employees must know, understand and comply with the health, safety and environmental requirements as applicable to the work they perform.
- Employees must report to their Supervisor any equipment malfunction that may effect the safe operation of the equipment.
- Employee must advise their immediate Supervisor whenever unsure of the instructions for a task or where concerned about the safety status of any task.
- Employees are required to use PPE as provided and directed, to use it correctly, and to report any malfunction in the PPE supplied.
- Employees are required to report any unsafe condition or act observed.
- Verify that inspection and audit follow up actions are fully and timely taken

8. DEVELOPMENT OF COMPETENCY AND WELL-BEING

8.1 **RESOURCES**

R K Insulation Engineers & Contractorsshall engage an experienced QEH&S Manager to undertake the execution of the Clients and CompanyQEH&S Management System.

The QEH&S organisation shall be staffed with qualified and skilled personnel who shall be adequately resourced in order to carry out the obligations of QEH&S management as committed within the QEH&S Plan.

QEH&S personnel shall be comprehensively trained and encouraged to identify risks and highlight the solution for mitigation of the risks to line management and the workforce in general.

8.2 HEALTH AND WELL-BEING

8.2.1 Personal Protective Equipment (PPE)

R K Insulation Engineers &Contractors and subcontractors shall ensure the PPE provided to personnel meets or exceeds agreed International Standards. In addition to the MANDATORY projects, Allocation of PPE shall be based on the risk assessments related to the particular tasks to be undertaken.

R K Insulation Engineers &Contractorsmay stipulate particular color-coding of hard-hat for specific work disciplines dependant on information received from Client

8.3 MANDATORY PPE:

The MANDATORY PPE for the R K Insulation Engineers & Contractorsidentified below is the minimum acceptable standard

- Construction hard Hat International approved (with suitable locations fort attachment of chin straps and hearing protection.)
- Eye Cover/shields (Term GLASS is not used, shields shall be clear as minimum, if dark shields are provided then clear are also to be provided. Personnel requiring optical corrective glasses are to be provided with suitable cover shields or strengthened glasses with certificate of proof. Shields are to be fitted with side entry protection).
- Clothing suitable for the working environment is required to be provided. Clothing should protect the body and extremities, long leg is minimum standard. No short pants will be permitted under any circumstances. (Long sleeve flame retardant clothing will be required in designated areas at hydrocarbon entry phase.) Long sleeves may be a requirement in PTW or JHA relevant to certain tasks.
- Capped footwear (approved alternative cap to steel is suitable with documentary proof of acceptance at international standard). Footwear upper is to be of a standard able to protect from penetration injury.

8.4 **QEH&S INDUCTION**

Prior to entry Projects, all personnel must undergo Induction (orientation) training, provided R K Insulation Engineers & ContractorsThis induction shall identify the specific and general requirements and hazards of the Project

8.4.1 <u>MAJOR Induction Definition</u>

- R K Insulation Engineers & ContractorsCommitment to QEH&S policies.
- Client &R K Insulation Engineers & Contractorsexpectations.
- Employee responsibilities, proactive safety performance.
- PROJECT overview.
- Identified EH&S risks.
- Environmental requirements & responsibilities.
- Accident prevention involvement.
- Incident investigation (root cause analysis) and reporting
- People Based Safety (PBS) program.
- Job Hazard Analysis (JHA).
- Emergency Communications Systems/Evacuation procedures.
- Medical Management.
- Permitting System, General & Hot Work.
- Specific Safety & Health Requirements.
- Security Program.
- Disciplinary Program.
- Vehicle Safety.
- Back Injury Prevention.
- Personal Protective Equipment (PPE).

- Fall Prevention/Protection.
- Fire Prevention/Protection.
- Basic Hazard Communication.
- Ladder and Scaffolding Safety.
- Perimeter Guarding/Floor Openings.
- Housekeeping.
- Welding and Burning.
- Gas Cylinders.
- Pressure Testing.
- Signs Barricades & Flagging.
- Tag out Lock Out.
- Electrical Safety.
- Rigging/Crane Safety.
- Confined Space Requirements.
- Excavation/Trenching/Shoring.
- Smoking policy.
- Drugs & Alcohol policy
- Hand Tool Safety
- Tailgate meetings

Other content as determined appropriate to the Clients Project Site and the hazards and risks tobe encountered.

8.4.2 OFFICE Induction Definition

Specific to all personnel engaged R K Insulation Engineers & Contractorsoffices.Shall conduct an office safety induction process, which shall be undertaken by all engineering office staff involved in the project. Visitors to offices shall be given information pamphlets.

Office Induction will consist of as a minimum.

- Commitment to QEH&S policies.
- Client R K Insulation Engineers &Contractorsexpectations.
- Visitor responsibilities, proactive safety performance.

8.5 SPECIFIC QEH&S PROGRAMS

In conjunction and in guidance with Client, Space Matrix DCPL shall implement proactive field safety management including People Based Safety (PBS), Safety Leadership Training, , Job Hazard Analysis (JHA)

8.5.1 People Based Safety (PBS)

PBS encourages observation of work activity and behavior that is contributory to causes of injuries (i.e. body mechanics, use of PPE, use of tools). Immediate feedback is given to positively reinforce safe behavior and coaching to correct at-risk behavior. Increasing employee involvement increases ideas for process/behavior improvement and leads to a reduced occurrence of at-risk behavior and challenges employees to achieve 100% safe behavior.

8.5.2 Safety Leadership Training

Is designed to train supervisors in ways to develop an ongoing awareness and appreciation of safety in the workplace. The Safety Leadership Training program should offer both practice and theory.

Topics covered should include Leadership Qualities, Behavior and Responsibility, Zero Incident Philosophy, Safety Culture, Impact of Injuries, cause and Effect, Behavior-Based Safety and Personal communications. Participants should develop a personal Leaders Plan for Change, taking on the challenge of at least one change or improvement. The training emphasizes that for an improvement in safety performance to occur change is necessary.

8.5.3 Job Hazard Analysis (JHA)

(Synonymous with Job Safety Analysis or JSA) divides the job into steps. The specific steps of the job that pose a hazard, risk will analysed, the hazards and risks evaluated, and controls proposed.

The JHA may be included as part of a work plan or work package and the requirements of the JHA may be incorporated into hazardous work permits. A JHA of jobs or operations is required, but not necessarily limited to, high risk jobs, new jobs or tasks that present an unknown or unspecified hazard; jobs or tasks involving new machinery or equipment; jobs involving high pressure, heavy rigging, deep excavations, physical or chemical exposures.

EH&S risks and control measures are identified and discussed by a multi-disciplinary team (Safety, Industrial Hygiene, Engineering etc). The Job Hazard Analysis is displayed in the working area.

8.6 DRIVING AND TRANSPORTATION

R K Insulation Engineers & Contractors recognize the inherent risks concerning transportation and driving on the project site for the transportation of personnel from accommodation locations, and the transfer of equipment and materials.

R K Insulation Engineers &Contractorsshall prepare a Journey Management Plan that shall address as a minimum.

- Driving Policy
- Types of Transportation utilised.
- Medium of transportation (personnel, material, equipment & special case)
- In country laws, identified habits and CLIENT requirements
- Reference to vehicle maintenance policies & procedures.
- Journey characteristics (night time, road conditions).
- Frequency and Extent of travel (regular and special)
- Potential Hazards.
- Associated Risks.
- Appropriate precautions.
- Disciplinary measures. (As identified in the security plan).

9. MANAGE INCIDENT RESPONSE

9.1 EMERGENCY ACTION PLAN

R K Insulation Engineers &Contractorsshall develop an Emergency Response Action Plan (ERAP). The ERAP shall be based upon on the information provided R K Insulation Engineers & Contractorsthrough the CLIENT Emergency Plan, which may be made available to R K Insulation Engineers & Contractors

R K Insulation Engineers &ContractorsEmergency Response Action Plan shall be based on the premise that all Emergency Response Action plans shall link to or from the CLIENT Emergency Action Plan.

9.2 THE ERAP SHALL CONSIST OF.

- 9.2.1 Scenario Considerations.
 - Personal Injury and outbreak of disease.
 - Motor Vehicle, aviation or marine accidents.
 - Fire.
 - Explosion.
 - Toxic and Flammable Gas release.
 - Loss of Containment.
 - Major Utility Outage.
 - Adverse weather. (Storm, earthquake or Natural Events).
 - Security breaches, sabotage, civil disorder, war.
 - Unexploded ordinance.
 - Environmental Emergencies.
 - Missing persons.

9.2.2 Key Elements.

- Identification with the CLIENT ERAP Plans from R K Insulation Engineers & Contractorsup to CLIENT and down to R K Insulation Engineers & Contractors
- Call tree identifying who contacts whom in the event of an occurrence that requires activation of ERAP.
- Identification R K Insulation Engineers & ContractorsERAP management process/personnel.
- Scenario development for ERAP including gaseous emissions from neighboring facilities.
- Sensor type and location
- Wind Direction warning locations.
- Emergency Evacuation Assembly Area (minor and major occurrence)
- Definition of Minor & Major Occurrence.
- Drills and training
- Means and Methods of communication.
- Location and resourcing of ERAP control center
- Co-ordination with Project Security Plan (PSP).
- Crowd and vehicular control.
- Co-ordination with Journey Management Plan (JMP). Evacuation resourcing.
- Co ordination with Health Management Plan (HMP). Triage and stabilization evacuation.
- Emergency Response Team (ERT) Composition, Resourcing, Training.

The R K Insulation Engineers &ContractorsERAP is a document that shall be regularly reviewed and updated and communicated with the nominated CLIENT representative, and through CLIENT to emergency services and global response support as identified within the CLIENT ERAP.

9.3 LEARN FROM EXPERIENCE.

R K Insulation Engineers &Contractorsshall develop and implement a system to report, analyse and remedy QEH&S related events. The premise shall be PLAN, DO, CHECK and REVIEW.

The process shall also be utilised to track performance of requirements on Management & Administration offices as well as Project Sites.

10. KEY PERFORMANCE INDICATORS

R K Insulation Engineers & Contractorssets key performance indicators in all its activities in the field of Safety, Health, Environment, & Quality by: -

- I. Continual improvement in proactive targets and objectives by creating positive awareness among the workmen & people in the vicinity of the working place.
- II. Imparting induction, refresher & specialized health & safety courses among the workmen so as to comply with safe operating procedures & avoid any mistakes that can cause untoward incidents.
- III. Insisting projects & operating plants to comply with all the prescribed safety & health measures as required by laws, standards & best practices in the world.
- IV. Asking the industries to conserve energy consumption so as to avoid overburdening of green house gases in the environment.
- V. Cutting down emissions of NO_X, SO₂, H₂S, CO & other harmful effluents by adopting suitable technological processes & conforming to right operational regimes.
- VI. Maintaining safe & health working conditions at the workplace to avoid health damage to the people & there by increasing the productivity in industry &well being of the people.
- VII. Taking particular care for occurrence of notifiable diseases and other non-recoverable health problems.

Annexure - 01

Quality, Environment, Health & Safety Commitment Policy

R K Insulation Engineers & Contractorsrecognizes Quality, Environment, Health and Safety as amongst the highest corporate priorities, as an integral part of its business performance, and as a key determination to sustainable development. The QEH&S Management system is therefore integrated into each business as a prime responsibility and as an essential element of management.

R K Insulation Engineers & Contractors, during all it's business activities, endeavors to:

- Add Quality element in all its services to the Customers, People, Value generation systems & processes.
- Provide a safe working environment for all personnel involved in the work.
- Comply with the requirements of all applicable Local laws and standards, and Customer's needs.
- Take all the measures for prevention of ill-health & injury to working people.
- Prevent any loss of production or damage to equipment or property, third parties included.
- Adopt the measures to prevent and reduce the environment impacts on air, water, soil & land during
 our activities so as to maintain & sustain eco-friendly surroundings for all the people.
- Pursue continual improvement of the QEH&S management and QEH&S performance.
- Perform QEH&S training programs and promote the awareness of the personnel at every level to work in a QEH&S responsible manner and to develop their QEH&S knowledge and skills.
- Assure the co-operation with public Authorities, customers, suppliers, local communities and other stakeholders on QEH&S issues.
- Require subcontractors to manage the QEH&S issues in an appropriate way, consistent with the requirements of the Space Matrix Design Consultants Pvt. Ltd QEH&S plan and management system.
- Promote the purchase and use of materials and equipment with a higher environmental compatibility and quality conformance.
- Regularly conduct audits on QEH&S management system and on the legal compliance.
- Apply the principle of pollution prevention and control on all the activities and services carried out.
- Promote a culture in which all project employees share this commitment.
- Provide energy, resources, product and services consistent with these aims.

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