

Technical Standard – Safety Management

Vedanta Resources Plc

Sustainability Governance System


Technical Standard

Safety Management

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Standard Title:	Safety Management	Date of Revision	21/10/2011
Standard:	VED/CORP/SUST/TS 10	Revision:	v.1

Document Issue and Revision History		
DATE	REVISION NUMBER	CHANGE SUMMARY
21/10/2011	1	Initial issue.

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Position:	Chief Sustainability Officer

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1. INTRODUCTION

The purpose of this Technical Standard is to ensure that Vedanta effectively manages the safety of employees and third parties (e.g. Contractor Employees and Affected Communities) and builds a positive safety culture through effective management systems. This Standard supports Vedanta's *HSE Policy*.

2. SCOPE

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

3. DEFINITIONS

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

Term	Definition
Affected Community	Local communities directly affected by the new or existing project/operation.
ALARP (As Low as Reasonably Practicable)	Consideration of the risk against the benefits or non-benefits that are needed to implement measures/controls to avoid the risk – where the cost (not just financial) of implementation of the measures is disproportionate to the benefits, it is not consider to be reasonably practicable.
Competent Person	An individual who has the necessary knowledge, skills and experience to complete their responsibilities safely, effectively and consistently.
Continual Improvement	A recurring process of enhancing safety governance systems in order to achieve improvements in overall performance consistent with Vedanta Mission, Values and Code of Conduct.
Contractor	Any third party organisation which is engaged or commissioned by Vedanta to undertake work or provide services.
Contractor Employee	An employee of a contracted company engaged or commissioned by Vedanta to undertake work or provide services, but who are not directly employed by Vedanta. For example, contractor employees working on Vedanta operations, persons working for Vedanta through staff/employment agencies, contract cleaners etc.
Confined Space	Is a wholly or partially enclosed space not designed or intended for human occupancy and in which a hazardous atmosphere could develop as a result of the contents, location or construction of the confined space or due to work done in or around the confined space.

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Term	Definition
Employee	An individual who is engaged to work directly for Vedanta on either a part-time (including hourly paid) or full-time basis and for a fixed period or on permanent basis and is salaried. By virtue of the individual's contract of employment, the employee is obliged to adhere to Vedanta's terms and conditions of employment (specific to Group or the subsidiary employing the individual), and is protected by national (where it exists) and international laws concerning labour and working conditions.
Emergency Preparedness and Response	A procedure that allows for quick and efficient response to accidents that may result in injury or environmental damage.
Hazardous Materials	Materials that represent a Hazard due to their physical or chemical characteristics.
Hazard	A situation which has the potential to cause harm to people, equipment or the environment.
ICMM (International Council on Mining and Metals)	The International Council on Mining and Metals (ICMM) was established in 2001 and seeks to drive performance improvement through its members which comprise 20 mining and metals companies, as well as 30 national and regional mining associations and global commodity associations.
IFC (International Finance Corporation)	Member of the World Bank that finances and provides advice to private sector ventures and projects in developing countries.
Operation(s)	A location or activity that is operated by a Vedanta Company and is part of the Vedanta Group. Locations could include mines, refineries, ports or transportation activities, wind farms, oil and gas development sites, offices including corporate head offices, and research and development facilities.
Risk	Combination of probability or frequency of certain hazardous occurrences and severity of impacts resulting from an occurrence.
Lone and Isolated Working	Someone working out of verbal and line of sight communication with a supervisor, other workers, or other persons capable of providing aid and assistance, for continuous periods exceeding one hour.
Standard Operating Procedures	This is a clearly laid down instruction for operation of, for example, a process plant, which takes into consideration general SHE requirements. The procedure represents good or best practice that should be inherited to at all times.
Risk Assessment	The identification, evaluation, and estimation of the levels of risks involved in a situation, their comparison against benchmarks or standards, and determination of an acceptable level of risk.

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Term	Definition
Stakeholder	Persons or groups that are directly or indirectly affected by a project as well as those that may have interests in a project and/or the ability to influence its outcome, either positively or negatively. This can refer to shareholders, lenders, employees, communities, industry, governments and interested third parties.
Stakeholder Engagement	An umbrella term encompassing a range of activities and interactions between Vedanta and its stakeholders over the life of a project that are designated to promote transparent, accountable, positive, and mutually-beneficial working relationships. Stakeholder engagement includes stakeholder identification and analysis, information disclosure, problem/conflict anticipation and prevention, ongoing consultation, formation of partnerships, construction of grievance resolution mechanisms, negotiated problem solving, employee involvement in project monitoring, regular reporting forums and procedures, and other related management activities.
UNEP	United Nations Environment Programme, coordinates the United Nations environmental activities, assisting developing countries in implementing environmentally sound policies and practices.
Vedanta Company	A subsidiary of Vedanta Group either fully or majority owned that has its own management structure (e.g. Hindustan Zinc Limited, Vedanta Aluminium Limited, Sterlite Industries limited, etc.)

4. PROGRAMME REQUIREMENTS

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

4.1. General Requirements

- a) Safety management programmes shall meet the requirements of the *IFC Performance Standards, the IFC EHS General Guidelines and the IFC Sector Guidelines*. These requirements are summarised as follows:
 - *Performance Standard 2 – Labour and Working Conditions*. This includes the requirement for the protection for basic rights of workers, treating the workforce fairly and providing them with safe and healthy working conditions.
 - *Performance Standard 4 – Community Health, Safety, and Security*. This includes the recognition that project activities, equipment and infrastructure often bring benefits to communities, including employment, services and opportunities for economic development, however, increased community exposure to risks and impacts arising from the project activities may occur. Hence the requirement to avoid or minimize risks and the impacts on the health and safety of Affected Communities, and the safeguarding of personnel and property.

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- *IFC EHS Guidelines.* The EHS Guidelines contain the performance levels and measures that are normally acceptable and applicable to projects or operations. Vedanta operations are expected to refer to these Guidelines (or other internationally recognised sources, as appropriate) when identifying hazards and risks associated with new projects or general operations. Applying the EHS Guidelines for existing operational activities may involve the establishment of operation-specific targets and a timetable for achieving the Guideline requirements. The applicability of the EHS Guidelines will be tailored to the nature and scale of the hazards and risks presented by the Vedanta operation.
- *IFC Sector Guidelines.* These Guidelines provide the performance levels and measures that are normally acceptable and applicable to projects or operations in specific industry sectors. Industry sector guidelines that may apply to Vedanta Operations include mining, base metal smelting and refining, wind power and thermal energy.

4.2. Safety Management System

- a) Operations management shall assess the work place and the potential hazards associated with the safety aspects. Operations management shall ensure the safety management system minimises, as low as is reasonably practicable (ALARP), the hazards and risks to employees and third parties (including Affected Communities) as outlined in this Standard and the suite of Vedanta Management Standards. The management system shall include the following methodology:
 - i) 'Plan' – establish objectives and processes required; specifically to identify and manage the risks of injury from Hazards
 - ii) 'Do' – implement the processes that are designed minimise exposure to the hazards and risks identified in order to prevent personal injury
 - iii) 'Check' – measure and monitor the processes and report results against the objectives
 - iv) 'Act' – take action to improve performance of the management system based on results; and
 - v) Adopt a continual improvement process.
- b) Operations management shall aim to reduce the number of accidents to a rate of zero.
- c) Operations management shall ensure there is a system in place for reporting, investigating and communicating lessons learnt from accidents/incidents.
- d) Operations management shall ensure facility-specific occupational health and safety hazards are identified based on job safety analysis or comprehensive hazard or risk assessment using established methodologies such as a hazard identification study [HAZID], hazard and operability study [HAZOP], or a quantitative risk assessment [QRA].
- e) Operations management shall ensure as a general approach, health and safety management planning should include the adoption of a systematic and structured approach for prevention and control of physical, chemical, biological, and radiological health and safety hazards.

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- f) Operations management shall implement all reasonable precautions to protect the safety of Employees, Contract Employees and third parties affected by the work activities and introduce preventative and protective measures (with a preference of the avoidance of risks and impacts over minimisation) according to the following order of priority:
 - i) Hazard elimination by removing the activity from the work process;
 - ii) Hazard control at the source through the use of engineering control mechanism;
 - iii) Hazard minimization through the design of safe systems of work, and administered control measures; and
 - iv) Provision of appropriate Personal Protective Equipment (PPE) in conjunction with training, use and continual maintenance. The provision and use of the personal protective equipment shall be managed and monitored by operational management.
- g) Operations management shall ensure the risks and impacts to the health and safety of Affected Communities prior to and during the lifecycle of the project/operation and addressing the identified risks and impacts in a manner proportionate with their nature and size.
- h) Operations management shall avoid and minimise the potential for community exposure to hazardous situations that may result from on-site project/operation activities.
- i) Operations management shall ensure as part of the risk management process, risk assessments are performed by recognised and qualified specialists, with a thorough risk assessment taking into consideration political, economic, legal, military and social developments, any patterns and causes of violence and potential for future conflicts that may arise, depending on the region.
- j) Operations management shall implement a process for identifying and reducing hazards associated with work activities carried out on a day to day basis.
- k) Operations management shall seek to obtain, and maintain, external certification of the safety management system to the internationally-recognised Health and Safety management system standard OHSAS 18001 through a third party. The management system will form part of Vedanta's risk management strategy to address changing legislation and protect the workforce.
- l) Operations management shall ensure all occupational health and safety practices and procedures comply with the *Vedanta Health, Safety and Environment Policy*.

4.3 Equipment Safety

- a) Operations management shall identify, assess and minimise the hazards and risks relating to rotating and moving equipment through the application of controls following the order of priority set out in section 4.3d.
- b) Operations management shall ensure all protective measures (e.g. guards), where fitted are designed and installed in conformance with appropriate machine safety standards.

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4.4 Electrical Safety

- a) Operations management shall identify, assess and minimise the hazards and risks posed by fixed electrical wiring and by portable devices (eliminating faulty or exposed electrical hazards).
- b) Operations management shall ensure service rooms housing high voltage equipment ('electrical hazard') are appropriately labelled and entry is controlled or prohibited.
- c) Operations management shall ensure all electrical equipment is designed such that it is able to be isolated "Locked Out" for maintenance to be performed.

4.5 Working at Heights

- a) Operations management shall have in place a safe system of work that identifies, assesses and minimises the hazards and risks in relation to working at height.
- b) Operations management shall ensure fall prevention measures (e.g. fixed guardrails) are implemented, so far as reasonably practicable, and in preference to fall arrest (e.g. harnesses) or fall mitigation (e.g. inflatable cushions) arrangements.
- c) Operations management shall make sure that Employees and Contractor Employees are made aware of the danger of working at heights.

4.6 Special Hazard Environments

- a) Operations management shall ensure a permit to work system is required for potentially hazardous activities and ensure measures are put in place to eliminate, as low as is reasonably practicable, the existence and adverse character of such activities, examples of which are listed but not limited to those below:
 - i) confined space work activity;
 - ii) working with high voltage electricity;
 - iii) working with pressure vessels, tanks, piping systems;
 - iv) working at heights (e.g. roof areas);
 - v) excavation
 - vi) hot work activities e.g. welding, cut and heating; and
 - vii) working over or by water.

Measures shall be implemented for the elimination or prevention of accidents and damage to people or property where foreseeable hazardous work is envisaged.

- b) Operations management shall ensure, prior to work or entry into a confined space, or in any of the areas listed above in 4.6 a), adequate and appropriate training has been received by all workers involved and potential rescue operation developed.
- c) Operations management shall have in place a system of work that identifies, assesses and minimises the hazards and risks in relation to lone working.
- d) Operations management shall ensure the system of work of lone and isolated workers includes standard operating procedures (SOPs) designed to ensure all the necessary PPE and safety measures, including rescue are in place before and during lone working.

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4.7 Driving and Vehicle Safety

- a) Operations management shall identify, assess and minimise the hazards and risks associated with travel, e.g. to and from the workplace; during the operation of project equipment/machinery on public or private roads.
- b) Operations management shall ensure traffic safety is promoted by all personnel during travel to and from the workplace and during the operation of equipment on private and public roads. This should include for example commencing the journey only when occupants are fully seated and have a seat belt fastened.
- c) Operations management shall ensure arrangements are established and maintained, as far as reasonably practicable, to segregate pedestrians from vehicles within or outside the buildings to ensure easy, safe and appropriate access.
- d) Operations management shall ensure vehicle driving and traffic safety practices promote the need for drivers to undergo periodic medical surveillance, the improvement of rear and frontal driving visibility using headlights, driving rights-of-way, the direction of traffic, site speed limits, circulation of delivery and private vehicles to defined routes and areas.
- e) Operations management shall ensure a road safety initiative appropriate to the scope and nature of Vedanta activities is developed and includes the adoption of best transport practices, regular maintenance of vehicles, minimization of pedestrian interaction with construction vehicles, coordination with emergency services and using locally sourced materials to minimize travelling distances.
- f) Operations management shall ensure all industrial vehicle drivers are adequately trained and experienced.

4.8 Emergency Preparedness and Response

- a) Operations management shall ensure there are documented measures in place to control an unplanned event resulting from activities undertaken by the organisation, or events out of the control of the organisation (e.g. flood, pandemic), which could impact on an individual's safety, and /or health within the facility or in the local community, lead to loss of life or damage to property, or lead to damage to the environment (See Vedanta *Emergency and Crisis Management Technical Standard* and the UNEP publication '*Good Practice in Emergency Preparedness and Response 2005*').
- b) Operations management shall ensure emergency preparedness and response plans are in place and tailored to the risks faced by the organization. The plans shall include an integrated approach to address emergency needs and protect the health and safety of workers, the public and the environment - inside and outside the physical project or operation boundary.
- c) Operations management shall document their emergency preparedness and response plans, resources and responsibilities and ensure relevant information is communicated to Employees, Affected Communities, relevant government organizations and other relevant parties (e.g. contractors, visitors etc).

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- d) Operations management shall ensure that, as far as is reasonably practicable, all possible communication aids are utilized in notifying workers in the event of an emergency and practice exercises and other training programs are undertaken and provided to test that an adequate level of emergency preparedness is implemented.
- e) Operations management shall ensure emergency response plans are reviewed and updated accordingly to reflect changes in equipment, processes, employees and facilities.
- f) Operations management shall ensure Standard Operating Procedures (SOPs) are developed for project or process shut-down, and an evacuation plan and drills are executed annually or more frequently as deemed necessary.
- g) Operations management shall ensure there is a system for notifying the local community should an emergency arise as a result of activities at the Operation..
- g) Operations management shall ensure a process is in place for interacting with the media and communicating information emergency information to the relevant media sector.
- h) Operations management shall ensure a mechanism providing or dealing with organisations that provide the following services are identified, implemented and kept current:
 - i) Fire Services – consider level of fire service capacity; response time; limitations
 - ii) Medical Services – fully trained first aiders, prior to transportation to the hospital;
 - iii) Availability of Resources (internally or externally) – personnel with specialist knowledge and experience;
 - iv) Mutual Aid – a clear and concise agreement on how to respond in the even of an emergency; and
 - v) Contact List – details of internal and external resources and personnel.

4.9 Fire and Explosion

- a) Operations management shall ensure control and prevention strategies are implemented to minimise or eliminate the hazards and risks of fire and/or explosions as a result of activities undertaken.
- b) Operations management shall ensure that, during the use of explosives, blasting activities are well managed, coordinated and effective communication procedures are in place.
- c) Operations management shall ensure the blasting site is secured and access and egress to the site is adequately controlled.
- d) Operations management shall identify, assess and minimise the hazards and risks resulting from welding and/or hot work activities.
- e) Operations management shall ensure fire precautions and standard operating procedures are implemented were activities such as hot cutting are undertaken.

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- f) Operations management shall ensure facilities that face fire risk have evacuation plans that are understood and have been rehearsed periodically (at least annually) by all workers to mitigate the consequences to people and the environment.

4.10 Safety in Building Design

- a) Operations management shall design, construct, operate and decommission the structural elements or components of a project in a way which minimises the hazards and risks to employees and third parties.
- b) Operations management shall ensure the general public while accessing the facilities are not exposed to hazards or put at risks.
- c) Operations management shall ensure opportunities have been identified during the design stage of the building/structure to eliminate or reduce to as far as is reasonably practicable the consequences of an accident.
- d) Operations management shall ensure all new buildings and facilities are designed, constructed and managed in full compliance with local regulations and internationally recognized and accepted life and fire safety standards.
- e) Operations management shall ensure life and fire safety systems are implemented, and where necessary a master plan identifying major fire risks is prepared. The plan should adequately address the following issues:
 - i) Fire prevention identifying ignition sources and fire risks;
 - ii) Means of escape adequately designed to facilitate safe evacuation;
 - iii) Fire detection systems and alarm;
 - iv) Prevention of the spread of fire through compartmentation;
 - v) Fire suppression and control;
 - vi) Emergency response; and
 - vii) Operation, maintenance, and testing of mechanical, electrical, life and fire safety systems.
- g) Operations management shall ensure work areas are designed in a way so as to prevent the start or spread of fire e.g. fire fighting or suppression systems.
- h) Operations management shall ensure a full assessment of an existing buildings life and fire safety system is undertaken by a qualified professional before occupation.
- i) Operations management shall identify, assess and minimise the hazards and risks from forces of nature e.g. floods, lightning strike, fires from surrounding areas, etc.

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4.11 General Workplace Safety Provisions

- a) Operations management shall ensure there is adequate work space for safe execution of all activities and clear passage to emergency exits.
- b) Operations management shall ensure all recurrent and permanent places of work are designed and equipped to protect occupational safety and health.
- c) Operations management shall ensure buildings are structurally safe, and provide appropriate protection against the climate, and have acceptable light, temperature and noise conditions.
- d) Operations management shall ensure all workplace structures are designed and constructed to withstand the expected elements, and have an area designated for safe refuge, if appropriate.
- e) Operations management shall ensure contingency measures are in place to address business continuity in an event of an emergency which may result in the loss of property, data/critical information, supplies of water, electricity, etc.
- f) Operations management shall ensure the provision of easy, safe and appropriate access for pedestrians and vehicles within and outside the building. This also applies to installations requiring servicing, inspections; prevention of unauthorized access to dangerous areas, etc.

4.12 Personal Protective Equipment (PPE)

- a) Operations management shall ensure Personal Protective Equipment (PPE) is actively used where alternative methods such as engineering controls, procedures and work plans cannot eliminate or sufficiently reduce the hazard. Operational management shall ensure PPE is issued and used by the relevant parties.
- b) Operations management shall ensure that PPE users are trained in the use of PPE and that suitable arrangements are in place for the storage and maintenance of PPE.
- c) Operations management shall identify, assess and minimise the hazards and risks to the eye that a variety of industrial processes including chemical sprays/splashes may cause.

4.13 Communication and Training

- a) Operations management shall ensure employees are committed to achieving a good safety performance through employee involvement, good communications, supportive leadership and, if necessary, the use of discipline to ensure compliance with standards.
- b) Operations management shall ensure provisions are in place to deliver adequate occupational health and safety training to all employees, and ensure all employees receive basic health and safety and adequate training relevant to their work activity.
- c) Operations management shall ensure all sites of activities have a fully functioning visitor's control system in place and all visitors and employees receive orientation training.

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- d) Operations management shall ensure all workers and contractors receive adequate training and information prior to commencement of work activities. This would allow them to understand the risks and hazards associated with the work activity.
- e) Operations management shall ensure training programmes are in place for employees (e.g. for the delivery of specialist occupational health and safety related courses). This will be implemented based on roles, responsibilities and capabilities of the individuals.
- f) Operations management shall ensure all hazardous areas are appropriately marked, the signage should be easily understood, and in accordance with international safety standards (e.g. IFC EHS Guidelines, OHSAS), and comply with local regulations, language and customs.
- g) Operations management shall ensure any of its vessels containing hazardous substances are labelled as to its contents and hazard, and include the appropriate colour coding and MSDS are available.
- h) Operations management shall ensure any hazard coding systems are easily accessible and understood, and made available to all including emergency services personnel.

4.14 Monitoring and Review

- a) Operations management shall ensure monitoring programmes are implemented to verify the effectiveness of prevention and control strategies.
- b) Operations management shall have procedures for periodic inspections of the workplace to ensure that the appropriate safety standards are maintained. In addition to workplace inspections, operations management shall ensure workplace audits are undertaken that focus on the behavioural aspects of employees at work to identify both safe and unsafe work acts.
- c) Operations management shall ensure monitoring and analysis are conducted in accordance with internationally recognised methods and standards (e.g. as set out in the IFC EHS General Guidelines and Performance Standards Guidance).
- d) Operations management shall periodically review their safety management system and incident performance. Reviewing performance shall be based on information from measuring activities (including both proactive and reactive monitoring) and from auditing activities in which independent assessments are made of the safety management system. In the event of a potentially serious incident a review should be undertaken in the relevant area.

4.15 Accident Investigation

- a) Operations management shall ensure all accidents resulting in the death or injury requiring first aid, medical treatment, restricted work or lost time, comply with the Vedanta *Incident Reporting and Investigation* Management Standard and guidelines.

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5. ROLES AND RESPONSIBILITIES

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

6. COMPLIANCE AND PERFORMANCE

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

- a) A documented and current risk assessment is available.
- b) All safety-related operational permits and safe systems of work are in place and permit requirements are complied with;
- c) Occupational health and safety evaluation against internationally published exposure guidelines;
- d) Fatality and accident rates benchmarked against the performance of facilities in the particular industry sector in countries through consultation with published sources e.g. the UK Health and Safety Executive (HSE) or USA OSHA;
- e) Monitoring programme designed and implemented by safety professionals. This could be monitoring hazards on specific projects; and
- f) The Safety Management System has been, and continues to be, certified to the OHSAS 18001 internationally-recognised health and safety management system standard.

7. SUPPORTING INFORMATION

Reference	Description
ICMM (International Council of Mining and Metals)	The ICMM has produced and published good practice guidance on a range of health, safety, environment and community issues relating to mining. http://www.icmm.com/library
International Finance Corporation Performance Standards Guidance Notes	The IFC has published Guidance Notes to guide the implementation of the full range of performance standards. These are available on the website. The guidance is currently being updated and draft versions are available however these have not yet been finalised and formally published. http://www.ifc.org/ifcext/sustainability.nsf/Content/PerformanceSt

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Reference	Description
	Standards
OHSAS 18001	Guidelines for occupational health and safety management systems. http://shop.bsigroup.com/en/ProductDetail/?pid=000000000030148086#
UNEP	Good Practice in Emergency Preparedness and Response 2005 http://www.unep.fr/shared/publications/pdf/WEBx0118xPA-GoodPracticeEN.pdf

8. REVIEW

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

9. RELATED DOCUMENTATION

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

Doc. Ref.	Document name
	Vedanta Code of Conduct
POL 06	HSE Policy
MS 02	Stakeholder Materiality and Risk Management
MS 06	Competency, Training and Awareness
TS 12	Occupational Health Management
TS 13	Emergency and Crisis Management