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	ALBA Code of Practice (ACOP)		025

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1 PURPOSE



The purpose of this procedure is to provide general guideline to contractors as well as the subcontractors for safe working at Alba facilities. The procedure addresses the health, safety and environment and social expectation from contractors whom are engaged with Alba in terms of adhering to Alba SHE and social procedure.



2 SCOPE

1. This procedure applies to all activities performed by contractors and sub-contractors at Alba smelter, Calciner and Marine and any ongoing construction areas, this procedure is also applicable for decommissioning/demolition activities at Alba site.
2. This procedure shall assist all contractor's and sub-contractors persons within Alba premises to meet their legal obligations to safe working from hazards without any risk to the safety and health of workers and the community/stakeholder as well as our surrounded neighbours.
3. The Contractor and Sub-Contractor shall abide by the detailed Safety and Health requirements listed in Project SHE Guidelines to Contractors Ref No.10-G-237 at all times. A copy of this book must be on each work site, readily available, at all times.
4. Alba retains the right to stop work at any time should any unsafe conditions or unsafe acts exist.
5. This procedure is not applicable for EPCM and EPC contractors as this particular categories are covered through Alba Environmental and Social Governance Framework and procedures associated with it.

3 COMPLIANCE OBLIGATION

1. Labour Law for the Private Sector (36) of 2012
2. Ministerial Order (8) of 2013 with respect to regulating occupational safety and health in establishments.
3. Ministerial Order (34) of 1977 with respect to Determining and Regulating Necessary Services and Precautions for the Protection of Workers from the Hazards of Repair and Demolition of Tanks, Drums and Work in Confined Spaces.
4. OHSAS18001:2007 Health and Safety Management System.
5. ISO14001:2015 Environmental Management System
6. Ministerial Order No.(3) of 2013 with respect to Banning Work During Noon Time
7. International Finance Corporation (IFC) Environmental, Health, and Safety (EHS) Guidelines for Environmental, Base Metal Smelting and refining, Community Health;
8. International Finance Corporation (IFC) Environmental, Health, and Safety (EHS) Guidelines for Environmental, Occupational Health and Safety;

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4 RESPONSIBILITIES AND ACCOUNTABILITIES

4.1 MANAGEMENT REPRESENTATIVE

Management Representatives is responsible for approving and confirming that all relevant departments are following the Contractors' Safety Health and Environment Management procedures.

4.2 CXOs/DIRECTORS



CXOs/ Directors are responsible for ensuring that all relevant departments are following the Contractors' Safety Health and Environment Management procedures.



4.3 SHE MANAGER

The SHE, Fire and Security manager is responsible for maintaining this procedure and ensure that it reflects the exact requirement for the fulfilment of the procedure purpose. Audit the system and comment on the practicality and effectiveness of these procedures.

4.4 DEPARTMENT MANAGERS

1. All department Managers and their supervisor's shall assume routine compliance to this Contractors' Safety Health and Environment Management procedures.
2. They shall ensure all contractors and sub-contractors within their area are aware of the Contractors' Safety Health and Environment Management procedures.
3. All department Managers and supervisors shall be obliged to implement all reasonable precautions to protect the health and safety of contractors workers.
4. Before hiring the Contractors, Procurement Manager shall be responsible to review the Contractor's technical capabilities, specifically on how they manage the occupational health and safety issues of their employees, extending the application of the hazard management activities.
5. As a process of prequalifying assessment on contracts, department Managers and Superintendents shall review the contractors and subcontractors SHE performance records.
6. Department Managers and Superintendents shall be review contractors experience in decommissioning and demolition work, before signing the contract.
7. Alba Medical Centre shall be responsible to Undertake health awareness and education initiatives by person-to-person counselling, a way to address a systemic factors that can influence individual behaviour as well as promoting individual protection, and protecting others from infection.

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- To protect workers from biological hazards (likely to cause disease), department Managers and Superintendents shall ensure that the contractor's workers working amenities are provided with sufficient engineering and administrative controls to avoid or minimize release of biological agents into the working environment.

4.5 DEPARTMENT SUPERINTENDENTS AND COORDINATORS

The department's Superintendents and Coordinators are responsible to ensure Contractors' Safety Health and Environment Management procedures are effectively implemented.



4.6 CONTRACTORS AND SUB-CONTRACTORS



The Contractors and sub-contractors are responsible to ensure this procedure is fully implemented as minimum requirement to perform his contract safely.

5 PROCEDURES

5.1 GENERAL REQUIREMENTS

- In these Rules and Regulations the term Alba's Aluminium Bahrain B.S.C. or its designated representative applies for the purpose of the work in question.
- Project SHE Guidelines to Contractors Ref No.10-G-237 shall form part of the bid / tender document sent to all, and any contractor, by the Purchasing department.
- The Contractor must inform Alba of any Sub-contractors to be employed by him, and will also be responsible for passing copies of these Rules and Regulations and the in Project SHE Guidelines to Contractors to such sub-contractors and for ensuring that they follow them.
- These Safety Rules and in the Project SHE Guidelines to Contractors Ref No.10-G-237 must be adhered to at all times. Any failure to comply fully with the safety rules may result in the immediate removal of the contractor from the site.
- As per law 36/2012 article 53, worker's actual hours of work shall not be more than 10 hours a day. This should be from the punching in to punch out and not more than 48 hours per week.
- The employee should not work under direct sunlight between 12:00pm to 4:00pm during the month of July and August which is peak summer.
- Contractor must submit a copy of his safety system and safety record along with the Tender.
- Contractor must submit method statement before carrying out any work.
- Risk assessment must be done as per Alba risk assessment ACOP-42A before any job.

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10. Alba has the right to penalize the contractor for committing repetitive safety violations. If the contractor fail to demonstrate the compliance of safety requirements, Alba may block contractor's vendor number for an appropriate period, during which time no new enquires will be sent.
11. Contractor must operate and use proven hand tools at site.
12. In case contractor wishes to carry out any work outside Alba normal working hours, then he shall:
 - a. Obtain written approval and right permits from Alba responsible department.
 - b. Provide full time site supervision.
 - c. Provide full time safety supervisor.

5.2 TRAINING

1. Contractor to ensure that his staff are fully aware and updated with hazards in the Alba specially hazards in the department area where the worker will be working.
2. Smelting facilities Managers shall provide a comprehensive environmental, health, and safety program through a cooperative process involving all interested parties, including community residents.
3. Reduction Line Manager shall provide training to the contractors and communities with regarding the health risks associated from smelter operations.
4. To provide refresher training on the Heat stress related hazards in annual basis.
5. Provide the employees with all training needed to perform their job safely that include as example but not limited to (D.C Hazard annually, Working at Height, Confined space, general knowledge about Isolation, general incidents review).
6. All rules related to work inside Alba such as the speed, molten metal Hazards, working hours limits.
7. Working under direct sun light during summer from 12 pm to 4 pm July & August.
8. Provide copy of licensure and training records to area owner to conform his legal position to safely carry required job in Alba.
9. Baseline medical assessments shall be conducted to contractors and sub-contractors in accordance with the ALBA Pre-placement Medical Assessment Standard and the ALBA Periodic Medical Assessment Standard.
10. Alba SHE training shall include an investigation of legacy issues for contaminated sites, including evaluation and remediation strategies.
11. Alba SHE training shall provide training and mock drills to contractors and sub-contractors for emergency preparedness and response plan. If required, with the participation of affected communities and relevant regulatory agencies.

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12. In coordination with Industrial Hygiene and Medical Centre, all the contractors' workers shall be provided with health training in disease treatments. This training program shall include immunization programs for workers to improve health and protection against infections.



5.3 SAFETY COORDINATOR

1. The contractor shall appoint a full-time Safety Officer (s) or Supervisor(s) as per the requirements set out by the Ministry of Labour and Social Development in article 30 of the no. 8 of 2013.
2. His full time function shall be to coordinate and manage the safety activities on the site, and shall be present at site at all times.
3. The Safety Coordinator shall hold the NEBOSH/National General Certificate, or a recognized Diploma in Safety and Health Management. The Manager: SHE will verify in case of other equivalent qualifications submitted.
4. Sufficient number of qualified & valid First Aiders must be available on site during all operations minimum of 5% of total manpower as per ACOP-016.
5. The contractor site manager and the Safety Coordinator shall attend the monthly Alba / Contractor SHE committee meeting.
6. Copies of the contractor's monthly safety meeting minutes are to be submitted to the Manager SHE at the end of each month.

5.4 ACCESS TO ALBA SITES

1. All contractors' personnel who need to enter Alba shall have a valid gate pass. Requirements of the job in question shall be discussed with Alba Project Engineer prior to the commencement of work and at agreed intervals.
2. All contractors' personnel shall be under surveillance and active screening, and supervision on treatment of workers.
3. The Contractors and Sub-Contractor's employees must attend the Alba Safety Induction Program before passes can be issued allowing them to start any work activity on any Alba site. It shall be the Contractors and Sub-Contractor's responsibilities to forward to the Alba Project Coordinator the names of all employees he intends to employ on this project.
4. A period of up to one month may be required for the induction program and issue of valid passes.
5. The departments shall make 'Request for Contractor badges' providing full details of contractors name, project title, name of employee, copies of smart card (ID) for Bahrain residents or copy of valid passport for non-residents, original medical fitness certificate and period of the project.

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6. For subcontractor employees, in addition to the above an original no objection from subcontractor including employees name and CPR number. The mentioned documents shall be submitted with the Request for contractors' badges by the contractor, four weeks prior to the date that badges are required
7. The Security and Fire Superintendent shall verify the correctness of details and will arrange to provide 'contractor's badges' with a serial number and with an expiry date. The expiry date should correspond with the date of the completion of the project or at maximum of one year.
8. These ID Badges will be given the computer code to work within Alba's P.T.R system.
9. All contractor employees must attend the safety and security induction, before issuing them the badges. The contractor shall pay an amount of BD 8 for Issuing new badges to account department, and amount of BD 3 for renewal, as for lost or damaged badges an amount of BD 5 to be paid.



5.5 DISPOSAL OF WASTE MATERIALS

1. The Contractor shall maintain a high level of good housekeeping at their work sites acceptable to Alba.
2. The Contactor shall not remove any effluent, scrap or surplus materials without obtaining material gate pass authority from Engineering/SHE department in which it will be indicated with destination of deposal.
3. Waste materials, scrap and rubbish must be removed immediately from the plant on a daily basis.
4. The contractor shall separate/segregate all usable land fill and/or any other recyclable materials from other non-usable wastes. Usable materials may be used at Alba/or outside the plant.
5. Usable landfill material can be deposited in specially designated areas, but only with written approval from the concerned Alba Departments.
6. Any contractor caught dumping (or proven) to have dumped waste material anywhere on the plant will be required to clear the area and surrounding area immediately and will be subjected to investigation.
7. Any further violation will result in being removed from site at his own expense and also the contractor will be suspended and or removed from the Alba approved list of suppliers for future projects.
8. All wastes to per dumped in agreed and approved locations. Any violation to that, the contractor will be held responsible.

5.6 USE OF ASBESTOS AND OTHER BANNED MATERIAL

Use of any asbestos material or its compounds or any other banned material is forbidden. Asbestos removal must be done according to the Alba asbestos removal procedure.

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5.7 PERSONAL PROTECTIVE CLOTHING (PPC) AND SAFETY EQUIPMENT

The Contractor shall ensure that his employees, and all the people for whom he is responsible, wear as per Alba Approved Standards:



1. Safety footwear which is nonconductive and which complies with ANSI Z41.4
2. Hard Hats to comply with British standard BSI 2826 or other approved authorized standards.
3. Approved Safety Glasses, British standard BSI 2092 or other approved standard, in all areas of the sites. The white clear glasses are to be used in indoors and low lighting areas.
4. Other protective clothing, gloves, Alba-approved full body safety harnesses, with shock absorbing lanyard and hearing protection as required or specified by Alba.
5. Alba will notify the Contractor of any special items of equipment's and clothing that may be required.
6. Contractor's employees working in port room's area shall have thorough knowledge and understanding of D.C. Hazards. The contractor shall verify with Alba project Engineer, regarding special needs such as D.C. hazard training, PPE, tools, tackles, lifting equipment's etc., applicable to the work.



5.8 PROVISION OF FRPPC TO CONTRACTOR'S

1. Contractors who are required to work in Hot Metal Areas will be required to ensure that their employees are equipped with approved FRPPC, (Fire Retardant Personal Protective Clothing) at the Contractor's cost.
2. Failure to comply with Alba's requirements regarding Personal Protective Clothing (PPC) and Personal Protective Equipment (PPE) will result in the Contractor's staff being refused entry to the Alba site.

5.9 USE OF POWER HAND TOOLS

1. Portable electrical tools will be restricted to operating at a voltage not exceeding 110 volts AC, 50 Hz. The power shall be supplied through a 220/110 Volt isolating transformer, having a centre tapping to earth, and the transformer shall be located near to the main power supply to keep the 220 Volt lead as short as possible.
2. Where necessary, low voltage extension leads may be used and these shall have three cores and terminate in approved connectors, which maintain earth continuity. The use of bare conductors pushed into open sockets is strictly forbidden. All electrical leads and portable tools must have proper connections fitted.

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3. All portable electrical and apparatus should be suitable for operating at a voltage not exceeding 110 Volt AC, except where the device is double insulated and is protected by an in-line earth leakage protection device (ground fault interrupter) with sensitivity not more than 30 milliamps.
4. The Contractor should arrange for an inspection to be carried out on all the electrical equipment that he intend to use on the projects before and during to check for possible insulation failures or cracks.
5. No joints are allowed without approval from Alba concerned personal.
6. The inspection will be carried out by the ALBA Project Engineer, or his representative, and the Contractor's site supervisor, prior to the commencement of the work.
7. Special regulations are applicable in the Reduction area, and site visit should be made at the time of tendering and to be checked prior to carrying out any work in this area.



5.10 PERMITS TO WORK

1. To ensure safe working under certain conditions it is necessary to obtain a 'Permit to Work system' from Alba's Project Engineer/area owner.
2. A Permit to Work system is designed to:
 - a. Ensure that all persons directly or indirectly involved with the operations are made fully aware of the work to be undertaken and its implications
 - b. Detail safeguards deemed necessary to ensure the work is carried out in the safest possible manner.
 - c. Contractor shall nominate his competent staff for the receipt of work permits. The authorization will be issued only upon successful completion of relevant training followed by tests and interview.
 - d. Contractor shall nominate his competent staff for fire watch which is a must for any hot work. He should be approved by Alba and shall always available at work site while hot work is being done.
 - e. An approved fire extinguisher shall be maintained at work site.

5.11 SAFETY SYSTEMS

1. Following are samples of the safety systems contactors need to adhere and respect:
2. General Permit to Work
3. COI & lock off/tag off by area approved certificate of isolation issuer
4. Permit procedures exists and must be complied with:
5. Hot Work
6. Confined Space Entry
7. Certificate of isolation
8. Access Permit (Power)

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9. Work-at-height
10. Excavation permit
11. Radio-active Materials handling
12. Mechanical/Electrical/Instrument-Isolations
13. Explosive Cartridge Tools are not allowed unless special permission obtained in righting.

5.12 WELFARE FACILITIES

Contractors shall provide descent welfare facilities for their employees. The location can be verified with the Alba Project Engineer, and the area will be allocated based on the project site. Facility provided shall include for the following minimum requirements:

1. Eating rooms, changing rooms, toilets.
2. All facilities shall be Air-conditioned, supplied with cool water and reasonable furniture.
3. Facilities must be maintained regularly and kept in good housekeeping standard.
4. Adequate fire prevention and fighting resources to be provided.

5.13 MOBILE PHONES



1. Mobile phones must not be used while driving.
2. Only authorized person may use mobile phone inside the plant.
3. For authorization must use form through Engineering or relevant Manager.
4. Once the authorization obtained SHE department will issue necessary badge.
5. Unauthorized persons shall not carry mobile phones inside Alba.



5.14 SITE CHECKING

The contractor is must to cooperate and implement all safety observation or comments raised by Alba during the normal safety checking and safety observation sessions.

5.15 CONTRACTOR EVALUATION PROGRAM

In order to provide a safe and healthy work environment for all contract and company employees, Alba will evaluate the safety performance and programs of contract companies prior to awarding bids. In making this evaluation, Alba will take into consideration the type of work to be conducted in the facility, how the work might impact the safety and environmental aspects of the facility, and the size of the Contractor Company. The

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evaluation will consist of two part, the first will be based on safety performance evidence provided by the contractor in light of Annual Requalification Assessment Sheet and the second part will be evaluation by the ALBA management evaluation to the contractor safety performance on site.

In the event a Sub Contractor is working for a General Contractor, it is the General Contractor's responsibility to ensure that the Sub Contractor meets all the requirements of the General Contractor's Safety programs and policies along with the Alba requirements. For further details, please contact purchasing department.



5.16 VEHICLES



The Contractor will ensure that:

1. All vehicles and mobile plant belonging to him or his people, the contractor is responsible for, possess the necessary Road Traffic Licenses and are fully insured against third party liability.
2. The contractor employees must not use forklift trucks for carrying personnel. In the pot rooms area forklift's fork must be electrically insulated from the body.
3. The personnel must not sit on the sideboards or tailboards of pick-up, forklift or other vehicles.
4. All drivers observe the plant speed limits displayed 40, 20, 15 or less at turns and congested plant areas, must wear seat belts and drive carefully at all times.
5. All cranes and lifting appliances have current valid test certificates in accordance with their rated capacity and are fully insured against third party.
6. All lifting equipment's and loose lifting tackles slings to be approved by area concerned lifting tackles inspector and coded with current Alba 6 monthly lifting tackle colour.
7. All vehicles emission shall comply with Bahrain road directorate's regulations.
8. The contractor shall abide with Bahrain Ministry of Labour order that regulates the usage of lifting equipment, lifting gear, and hoist. The contractor shall maintain valid records for all equipment and submit to Alba prior to the use by minimum of two weeks.

5.17 PORTABLE LADDERS

1. All ladders used in Alba should have stickers on them showing maximum safe load.
2. Workers should only use ladders that have a duty rating higher that the total weight to be supported by that ladder.
3. Supervisors should ensure that all ladders used by workers are rated appropriately for the workers and the tasks to be performed.
4. No metallic ladders are allowed to be brought in Alba unless a special request is made to the area Manager.

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5. Scaffold shall be provided whenever work needs safe access.
6. Only approved Scaffolding Contractor can erect, modify and/ or approve the use of any scaffolding work.
7. For Approved scaffolding contractors refer to workshop or area owner where the work will be done.
8. Scaffolding contractor shall
9. Erect, check and approve the scaffold
10. Inspect/ revalidate tags every week
11. Carry out any necessary changes, modifications or extension to an existing scaffold and to retest it for tagging.
12. Appoint full time sit supervisor to oversee works at site.
13. Alba has the right to order the removal of any faulty or defective equipment of contractor that may endanger life of the users. It is a must that all contractors shall be inspected prior to use or entering Alba.

5.18 ASSISTANCE



Alba will be pleased to assist contractors in any way to facilitate the execution of their work in safe manner to ensure a speedy and safe completion of their contract with Alba. As long as it is practical and safe to do so.

5.19 MSDS

1. Contractor to review and follow MSDS whenever required for all material that he will be using.
2. Contractor shall provide a copy and record of all MSDS applicable to the project and ensure the site staff understand and follow the MSDS and area owner informed.

6 REVIEW

This procedure will be reviewed, when and as per required, by the inception of new or amended ongoing legislation, request by the external/internal auditors, as a result of the management review committee or when a significant change is required to be made on the current health and safety management system.

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