

PLENSER WASTE MANAGEMENT LIMITED

Healthcare, Industrial & Specialised Waste Solutions

HEALTH & SAFETY POLICY

Protecting Our People, Our Clients, and Our Communities

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Applies To	All PWML staff, contractors, and visitors to PWML sites and vehicles
Classification	Internal Policy – to be made available to staff, clients, and regulatory bodies on request

Plenser Waste Management Limited is committed to providing a safe and healthy workplace for all employees, contractors, clients, and visitors. This policy sets out our obligations, standards, and responsibilities under the Occupational Safety and Health Act (OSHA) 2007 and all applicable Kenyan regulations.

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1. CEO / Management Commitment Statement

A Message from Leadership

At PWML Waste Management Limited, we handle some of Kenya's most hazardous materials — every single day. Infectious waste. Sharps. Pharmaceutical chemicals. Pathological tissue. Industrial by-products that can cause serious harm if mishandled.

That reality makes Health & Safety not simply a regulatory obligation for us — it is the moral foundation of everything we do. Our people go home safely every evening. Our clients trust us to protect their staff and communities. Our operations do not harm the environment we are committed to protecting.

This policy is our formal commitment to that standard. It applies to every person who works for, with, or visits PWML — without exception, without compromise, and without negotiation.

We provide the training. We provide the equipment. We set the standards. And we hold ourselves and every member of this team accountable to them.

Management — Plenser Waste Management Limited

2. Scope & Application

This Health & Safety Policy applies to:

- All permanent and temporary employees of Plenser Waste Management Limited
- All contractors, subcontractors, and service providers working on behalf of PWML
- All visitors to PWML's incineration facility, offices, and operational sites
- All activities carried out in PWML's name – including waste collection, transport, incineration, site assessments, training, and advisory services
- All PWML vehicles during operational use

This policy applies across all locations where PWML operates – including client facilities during collection visits, public roads during waste transport, and the PWML incineration and treatment facility.

  No Exceptions
• There are no exceptions to this policy based on seniority, urgency, convenience, or client pressure.
• If a safe method of completing a task does not exist or is not available, the task must stop until it can be done safely.
• Any instruction to bypass this policy – from any person at any level – must be refused and reported immediately to the Operations Manager or BDM.

3. Legislative Framework

Plenser Waste Management Limited operates in full compliance with the following Kenyan legislation and regulatory frameworks. This policy is designed to meet or exceed the requirements of all applicable laws:

Legislation / Regulation	Relevance to Plenser Waste Management Ltd
Occupational Safety & Health Act (OSHA) 2007	Primary legislation governing workplace safety in Kenya. Sets out employer and employee duties, workplace inspections, and enforcement powers of DOSH.
Environmental Management & Coordination Act (EMCA) Cap 387	Governs environmental protection, waste management obligations, and NEMA licensing requirements for waste treatment facilities.
Sustainable Waste Management Act 2022	Updated framework for waste classification, treatment, transport, and disposal obligations for all waste management operators in Kenya.
Work Injury Benefits Act (WIBA) 2007	Provides for compensation and benefits to employees who suffer work-related injuries or occupational diseases.
Public Health Act Cap 242	Governs public health standards relevant to the handling of infectious and hazardous biological materials.
Radiation Protection Act Cap 243	Applicable to any radioactive waste or equipment encountered in healthcare settings.
Pharmacy & Poisons Board (PPB) Regulations	Governs the handling and disposal of pharmaceutical products and controlled substances.
Kenya Traffic Act & NTSA Regulations	Governs the safe operation of PWML's waste transport vehicles on public roads.
NEMA Waste Management Regulations	Specific regulations for the collection, transport, treatment, and disposal of regulated waste categories.
KEBS Standards for Incineration Equipment	Technical standards that PWML's incineration equipment must meet and maintain.

4. Health & Safety Objectives

PWML's health and safety objectives are specific, measurable commitments that guide our daily operations and annual improvement planning. These objectives are reviewed at least annually by management.

#	Objective	How We Measure It
1	Zero lost-time injuries among all PWML staff in any rolling 12-month period	Incident log – monthly review by Operations Manager
2	100% of staff complete mandatory HSE induction before commencing any operational duties	Training records – verified by Admin before first shift
3	100% PPE compliance on every waste collection, incineration session, and handling activity	Random spot-checks by Operations Manager – weekly
4	Zero regulatory non-compliance incidents with NEMA, DOSH, or KEBS	Compliance calendar – monthly review by BDM
5	All incidents reported within the same working day – no delayed or unreported incidents	Incident register – reviewed monthly by management
6	100% of vehicles pass pre-departure safety inspection every operating day	Signed vehicle inspection logs – reviewed weekly
7	Annual HSE audit completed and corrective actions closed within 30 days	Audit report and action tracker – reviewed by CEO
8	All emergency response equipment inspected monthly and confirmed serviceable	Equipment inspection log – monthly sign-off by Operator

5. Roles & Responsibilities

Health and safety is everyone's responsibility at PWML. The following table defines specific obligations by role. Ignorance of these responsibilities is not an acceptable defence in the event of an incident.

Role / Position	Health & Safety Responsibilities
Group CEO (GCEO) & CEO	Ultimate responsibility for health and safety across the entire organisation. Approve this policy and all major HSE investments. Ensure adequate resources – financial, human, and equipment – are provided to maintain the highest safety standards. Conduct annual policy review.
Business Development Manager (BDM) / Operations Manager	Day-to-day accountability for HSE compliance across all operations. Ensure all staff are trained and equipped. Conduct weekly safety spot-checks. Manage all incident investigations. Maintain the compliance calendar. Represent PWML in all DOSH, NEMA, and regulatory inspections.
Incinerator Operators	Follow incineration SOP (SOP 003) at all times. Complete pre-incineration safety checklist before every session. Wear full PPE – no exceptions. Monitor and record operating temperatures throughout every burn. Report any equipment fault or abnormality immediately. Never leave the incinerator unattended during operation.
Drivers	Complete and sign vehicle pre-departure checklist every operating day. Ensure waste is correctly loaded, contained, and secured before moving the vehicle. Never leave the vehicle unattended with waste on board in a public location. Report all road incidents – including minor ones – to the Operations Manager immediately. Obey all traffic laws and NTSA requirements.
Loaders	Wear full PPE at all times during waste handling – donned before approaching any waste. Handle containers carefully – no dragging, throwing, or overloading. Never handle waste without the Driver present. Report any spillage, injury, or equipment failure immediately.
Sales Representatives	Wear appropriate PPE during facility site assessments. Follow client facility safety instructions at all times. Never enter restricted clinical or industrial areas without an escort. Report

	any HSE concerns observed at client facilities to the Operations Manager.
All Staff	Read, understand, and follow this policy and all related SOPs. Use PPE correctly at all times. Report hazards, near-misses, and incidents immediately – same day, no exceptions. Participate in all mandatory HSE training. Refuse to carry out any task that presents an uncontrolled risk to their safety or the safety of others.
Contractors & Visitors	Follow all PWML HSE rules while on PWML premises or in PWML vehicles. Wear required PPE – provided by PWML if not available. Report any hazard or incident to the Operations Manager. Comply with the instructions of PWML staff at all times.

6. Hazard Identification & Risk Assessment

PWML conducts formal risk assessments for all operational activities. These are documented, reviewed at least annually, and updated whenever a process, equipment, or working environment changes. All risk assessments are maintained in the HSE file held by the Operations Manager.

Key Hazard Categories at PWML

Hazard Category	Examples	Primary Controls
Biological / Infectious	Infectious waste, sharps, pathological tissue, blood, bodily fluids	PPE, correct packaging, colour-coded segregation, incineration
Chemical	Pharmaceutical waste, laboratory reagents, industrial solvents, disinfectants	Chemical-resistant PPE, SDS sheets, proper containment, incineration
Physical – Sharps	Needles, blades, lancets, broken glass	Rigid sharps containers, puncture-resistant gloves, no recapping of needles
Thermal	High-temperature incinerator surfaces, hot ash, exhaust gases	Heat-resistant gloves and coveralls, cool-down periods, temperature monitoring
Ergonomic	Manual handling of heavy waste containers, repetitive lifting	Two-person lifts for heavy loads, training, weight limits per container
Road & Transport	Vehicle accidents, vehicle breakdown with waste on board	Pre-departure checks, safe driving standards, emergency contacts
Fire & Explosion	Fuel, flammable waste, incinerator fuel systems	Fire extinguishers, no smoking policy, emergency shutdown procedures
Psychological	Exposure to distressing waste types, work pressure	Staff support, supervision, open reporting culture, welfare provisions

Risk Assessment Process

1. Identify all hazards associated with the task or work area
2. Assess the likelihood and severity of harm – assign a risk rating (Low / Medium / High / Critical)
3. Implement controls to eliminate or reduce risk to the lowest reasonably practicable level
4. Document the assessment, controls, and residual risk in the Risk Assessment Register
5. Communicate the assessment to all staff performing the relevant task
6. Review after any incident, near-miss, or significant change to operations

7. Personal Protective Equipment (PPE)

PPE is the last line of defence — not the first. PWML first eliminates or minimises hazards through safe systems of work, engineering controls, and training. Where residual risk remains, PPE is mandatory. **PWML** provides all required PPE to staff free of charge.



ABSOLUTE PPE RULE

- No PWML staff member may handle, collect, load, or incinerate any waste without wearing the correct PPE for that task.
- Damaged, missing, or ill-fitting PPE must be reported before the task begins — not after.
- A line manager or client instructing staff to skip PPE must be refused and reported to the Operations Manager immediately.
- PPE is not optional. It is not a suggestion. It is mandatory.

PPE Item	When Required	Standard Required
Nitrile or heavy-duty rubber gloves	All waste handling, collection, and loading activities	Puncture-resistant, minimum 8-mil nitrile or equivalent
Heat-resistant gloves	All incineration operations, ash handling	Rated for minimum 250°C
Coveralls / Overalls	All waste handling and incineration operations	Disposable or washable, worn over personal clothing
Fire-retardant coveralls	All incineration operations	FR-rated, worn over personal clothing
Safety boots (steel-toed)	All operational areas — collection, loading, incineration facility	EN ISO 20345 or equivalent Kenyan standard
High-visibility vest	All collection activities at client sites and outdoor facilities	Minimum Class 2 reflectivity
Surgical face mask	All waste collection and handling activities	Minimum ASTM Level 2 or equivalent

N95 / FFP2 respirator	Pathological waste, pharmaceutical waste, ash handling, incineration	NIOSH-approved N95 or equivalent
Safety goggles / face shield	All waste handling, incineration, chemical waste	Indirect-vent goggles or full face shield where splash risk exists
Hard hat	Loading operations, incineration facility during maintenance	EN 397 or equivalent

PPE Management

- Operations Manager maintains a PPE inventory — stock levels checked monthly
- All PPE inspected before use — damaged items removed from service immediately
- Disposable PPE disposed of in designated waste stream after each use
- Reusable PPE cleaned and stored correctly after each use
- Staff sign a PPE receipt log when issued new PPE

8. Waste Handling & Collection Safety

The collection of hazardous waste from client facilities is one of **PWML**'s highest-risk activities. The following requirements apply to every collection – no exceptions based on time pressure, client relationships, or convenience.

Waste Segregation Standards

Waste Category	Container / Bag Colour	Handling Requirement
Sharps	Yellow rigid sharps container	Never recap needles. Always upright. Never compress or overfill beyond the fill line.
Infectious waste	Yellow biohazard bag	Double-bag if the bag is damaged. Seal securely before handling. Minimum N95 PPE.
Pathological waste	Red biohazard bag	Full PPE including N95 respirator. Handle minimally. Seal and label clearly.
Pharmaceutical waste	Purple/violet bag or labelled container	Keep separate from all other waste streams. Full PPE. Document batch details.
Confidential documents	Secure sealed bags/boxes	No tearing or opening of sealed bags. Maintain chain of custody.
Chemical / Laboratory waste	Approved chemical-resistant containers	Check SDS before handling. Chemical-resistant gloves and goggles mandatory.
General infectious PPE	Yellow biohazard bag	Seal securely. Do not compress by hand.

Manual Handling Safety

- No single person should lift a waste container exceeding 25kg – use two-person lift for heavier loads
- Bend at the knees, not the waist – correct lifting technique is mandatory
- Do not drag containers across surfaces – use trolleys or lifting aids where available
- Sharps containers must never be laid on their side or compressed
- Report any musculoskeletal pain or discomfort related to manual handling to the Operations Manager

9. Incineration Facility Safety

The PWML incineration facility is a controlled, access-restricted area. The following rules apply at all times to protect operators, visitors, and the surrounding community.

Access Control

- Only trained, authorised personnel may enter the incineration operation area
- All visitors must be accompanied by a member of PWML staff at all times – no unescorted access
- Appropriate PPE must be worn by all persons in the operational area – including visitors
- 'No Entry – Authorised Personnel Only' signage must be clearly displayed at all entry points

Incineration Operation Safety Rules

- The incinerator must NEVER be left unattended during an active burn – at any time, for any reason
- Incinerator must reach minimum operating temperature (850°C primary / 1,000°C secondary) before waste loading begins
- Never exceed the incinerator's rated load capacity – overfilling causes incomplete combustion and equipment damage
- Waste must be loaded in accordance with the approved waste types list – never incinerate unknown or unapproved materials
- All incineration temperature data must be recorded every 30 minutes during operation
- Allow complete cool-down before opening the chamber for ash removal – never rush the cool-down phase

Fire Safety at the Facility

- Minimum two dry-powder fire extinguishers stationed at the incineration area – inspected monthly
- Fire assembly point clearly marked – all staff must know the location and route
- No smoking anywhere within the facility boundaries
- Flammable materials stored separately from the incineration area in a designated flammables store
- Fire escape routes kept clear at all times – no storage in corridors or stairways
- Annual fire drill conducted and logged

 FACILITY SAFETY INSPECTION SCHEDULE
• Daily: Visual inspection of incinerator, PPE stock, fire extinguishers, and receiving area by Operator
• Weekly: Full facility walkthrough by Operations Manager – documented in HSE inspection log
• Monthly: PPE inventory, fire equipment inspection, emergency exit check
• Quarterly: Professional equipment service by KEBS-certified engineer
• Annually: Full NEMA compliance audit – all records available for inspection

10. Vehicle & Transport Safety

The transport of hazardous waste on public roads carries significant risk to PWML staff, other road users, and the public. Every PWML vehicle must meet and maintain the following standards.

Vehicle Requirements

- Valid NTSA inspection certificate at all times
- Valid insurance covering hazardous waste transport
- PWML waste transport permit displayed
- Clearly marked 'HAZARDOUS WASTE – DO NOT OPEN' signage on the waste compartment
- Locked waste compartment – lockable with key held by Driver at all times
- Spill kit on board: absorbent materials, biohazard bags, containment trays, disposal supplies
- First aid kit on board – inspected monthly
- Fire extinguisher accessible from the cab – inspected monthly

Driver Standards

- Valid driving licence for the vehicle class at all times
- Zero tolerance for driving under the influence of alcohol, drugs, or any substance that impairs judgment
- No mobile phone use while driving – hands-free only
- Adherence to all speed limits – PWML vehicles are not to exceed 80km/h on open roads regardless of road conditions
- Driver must not carry unauthorised passengers in the vehicle
- Vehicle must never be left unattended with waste on board in a public place



ROAD INCIDENT PROCEDURE

- Stop safely. Do not move the vehicle if it has been in a collision.
- Ensure personal safety. Call 999 or police if required.
- Call the Operations Manager immediately – before speaking to third parties.
- Do not discuss the contents of the vehicle with third parties.
- Complete a Vehicle Incident Report Form the same day.
- Do not drive a vehicle that has been in an incident until cleared by Operations Manager.

11. Infection Prevention & Control

Given the nature of PWML's work — daily contact with infectious, pathological, and biological waste — infection prevention is a core operational discipline, not an afterthought.

Standard Precautions — Mandatory for All Staff

- Treat all waste as potentially infectious at all times — regardless of its source or appearance
- Never touch your face, eat, drink, or smoke while handling waste or in operational areas
- Wash hands thoroughly with soap and water immediately after removing gloves — minimum 20 seconds
- Use hand sanitiser as a supplement to handwashing — not a replacement
- Cover all cuts and abrasions on skin with waterproof dressings before starting work
- Report any skin conditions, open wounds, or illness that may compromise safety to the Operations Manager before starting work

Sharps Safety

- Never recap used needles under any circumstances
- Report any needlestick injury immediately — same moment, not later
- First response to needlestick: encourage bleeding, wash with soap and running water, do not suck the wound
- Seek medical attention the same day for post-exposure assessment — Operations Manager to arrange
- Complete Incident Report Form and Needlestick Injury Form on the same day

Decontamination

- All reusable PPE decontaminated with appropriate disinfectant after every use
- Vehicle waste compartment cleaned and disinfected after every collection run
- Receiving area at the incineration facility disinfected after every waste intake session
- Spillage of infectious material: treat as a biological hazard — use spill kit, contain, collect, disinfect, and report

12. Emergency Preparedness & Response

PWML maintains documented emergency procedures for all foreseeable emergency scenarios. All staff must be familiar with these procedures before commencing operational duties.

Emergency Type	Immediate Action	Who to Call
Hazardous waste spillage	STOP all activity. Contain spillage using spill kit. Prevent spread. Do not clean up without correct PPE. Secure the area.	Operations Manager immediately, then NEMA if significant
Fire at facility	Raise alarm. Evacuate to assembly point. Call 999. Do not re-enter. Use extinguisher only if safe and trained to do so.	999 (Fire), then Operations Manager
Staff injury / exposure	Provide immediate first aid. For needlestick: wash wound, seek medical attention same day. For chemical exposure: rinse affected area for minimum 15 minutes.	Operations Manager, then medical facility
Vehicle accident	Stop safely. Call 999 if injury. Do not move vehicle. Secure waste compartment. Do not discuss contents with third parties.	999 (Police/Ambulance), then Operations Manager
Incinerator malfunction	Stop loading waste. Do not shut down abruptly if burning. Follow manufacturer emergency procedure. Ventilate the area.	Operations Manager immediately
Regulatory inspection visit	Do not obstruct or mislead inspectors. Remain professional and cooperative. Direct inspector to Operations Manager or BDM immediately.	Operations Manager / BDM immediately

Emergency Contact Card

The following emergency contact card must be posted at the incineration facility, in every PWML vehicle, and distributed to all staff:

Contact	Number
Kenya Police / Ambulance / Fire	999 / α /0202100981
PWML Operations Manager	+254 XXX XXX XXX
PWML BDM	+254 XXX XXX XXX
PWML CEO	+254 XXX XXX XXX
Nearest Hospital A&E	
NEMA Emergency Line	
DOSH Regional Office	
Poison Control	+254

13. Incident Reporting & Investigation

PWML operates a zero-blame incident reporting culture. The purpose of reporting and investigating incidents is to prevent recurrence – not to punish the individuals involved. Staff who report incidents or near-misses in good faith will not face disciplinary action for doing so.

✓ WHAT MUST ALWAYS BE REPORTED
• Any injury to a member of staff, contractor, or visitor – however minor
• Any needlestick or sharps injury
• Any spillage of hazardous, infectious, or chemical waste
• Any vehicle accident or damage – including in the facility grounds
• Any near-miss – a situation where an injury or incident nearly occurred
• Any equipment malfunction or failure – including the incinerator
• Any fire, smoke, or unusual odour at the facility or in a vehicle
• Any contact from a regulatory authority (NEMA, DOSH, KEBS, Police, Ministry of Health)
• Any illness that may be work-related – even if the connection is uncertain

Reporting Procedure

- Report the incident verbally to your line manager immediately – same hour, not the next day
- Make the situation safe – contain spillage, provide first aid, secure the area
- Complete the PWML Incident Report Form (Form F-14) on the same day
- Line manager countersigns and adds their observations and immediate actions taken
- Operations Manager reviews all incident reports within 24 hours
- For serious incidents – injury, significant spillage, fire – Operations Manager initiates formal investigation within 48 hours
- Root cause analysis and corrective action plan produced within 5 working days of serious incidents
- All incidents logged in the Incident Register – reviewed monthly in management meeting

DOSH Notifiable Incidents

The following categories of incident must be reported to DOSH under the Occupational Safety & Health Act 2007. The Operations Manager is responsible for making this notification:

- Any fatality occurring in connection with work activities
- Any injury causing hospitalisation for more than 24 hours
- Occupational disease or work-related illness confirmed by a medical practitioner
- Dangerous occurrence as defined under OSHA 2007

14. Training & Competency

No member of PWML staff may carry out any operational task without completing the mandatory training for that role. Training is not optional, and completion is verified before operational duties begin.

Training Programme	Who Must Complete	When	Refresh
HSE Induction – PWML Policies & Procedures	All staff – before first operational day	Before commencing duties	Annually
Waste Segregation & Handling	Drivers, Loaders, Operators	Before first collection or incineration shift	Annually
PPE Correct Use & Fitting	All operational staff	HSE induction	Annually or when new PPE introduced
Manual Handling & Safe Lifting	Drivers, Loaders	Before first shift	Annually
Incinerator Operation – Certified Training	Incinerator Operators only	Before operating incinerator	Per NEMA/KEBS requirement
Infection Prevention & Control	All operational staff	HSE induction	Annually
Emergency Response & Evacuation	All staff	HSE induction + annual drill	Annual drill mandatory
Needlestick Injury Response	All operational staff	HSE induction	Annually
Vehicle & Road Safety	All Drivers	Before first collection run	Annually
Hazardous Spill Response	Drivers, Loaders, Operators	HSE induction	Annually

Regulatory Awareness – NEMA, DOSH, OSHA	All staff	HSE induction	When regulations change
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- Training records maintained by Admin in each staff member's personnel file
- Staff receive a participation certificate for all completed training programmes
- Failure to complete mandatory training before commencing operational duties is a disciplinary matter

15. Welfare & Mental Health

PWML recognises that working with hazardous, distressing, and biologically risky materials every day can take a physical and psychological toll. We take staff welfare seriously – not as a compliance exercise, but because our people are our most important asset.

Physical Welfare

- Clean toilet and handwashing facilities provided at the PWML facility – with soap and hand sanitiser at all times
- Clean drinking water available in the workplace at all times
- Rest area separate from operational areas – staff must have a clean, safe space to take breaks
- Working hours monitored – no staff member expected to work shifts that compromise safety through fatigue
- Appropriate clothing and PPE provided – staff should never be cold, wet, or unprotected in the course of their duties

Mental Health & Psychological Safety

- Staff who handle distressing waste categories (pathological, paediatric waste) may request to speak with management about concerns – no request will be dismissed
- Open-door policy: any member of staff may raise a welfare, safety, or personal concern with the Operations Manager or BDM at any time without fear of negative consequence
- Staff experiencing post-incident stress following serious incidents will be supported – Operations Manager to provide referral to appropriate support services
- No member of staff will be ridiculed, dismissed, or penalised for raising a genuine safety or welfare concern

Work-Related Illness

- Any staff member who develops symptoms that may be related to their work – skin conditions, respiratory issues, gastrointestinal illness – should report to the Operations Manager immediately
- PWML will arrange appropriate medical assessment for any suspected work-related illness
- WIBA 2007 coverage applies to all staff – Operations Manager to provide details on request

16. Contractor & Visitor Safety

All contractors and visitors to PWML's facility or vehicles are subject to the same health and safety standards as PWML staff. The Operations Manager is responsible for ensuring all contractors and visitors are properly briefed before accessing operational areas.

Before a Contractor or Visitor Arrives

- Operations Manager assesses the purpose of the visit and any associated risks
- Appropriate PPE identified and arranged — PWML will provide if not available
- Visitor informed of relevant safety rules by phone or email before arrival

On Arrival

- All visitors sign in at reception and read the PWML Visitor Safety Briefing card
- Visitor is accompanied by a PWML staff member at all times in operational areas
- PPE donned before entering any waste handling or incineration area
- Any visitor who refuses to follow safety instructions will be politely asked to leave

Contractors Carrying Out Work at the Facility

- All contractors must provide evidence of their own HSE policy and relevant liability insurance before commencing work
- Contractors working in or near operational areas must follow all PWML HSE rules in addition to their own
- Any contractor-caused incident must be reported to the Operations Manager immediately

17. Monitoring, Audit & Review

PWML monitors health and safety performance continuously and conducts formal reviews on a scheduled basis. The goal is not to pass audits – it is to continuously improve the safety of our people and operations.

Activity	Description	Frequency	Owner
Daily HSE check	Operational site walkthrough: PPE availability, waste area safety, vehicle readiness, incinerator condition	Daily	Operator / Driver
Weekly management inspection	Formal inspection by Operations Manager covering all operational areas, vehicle fleet, and PPE stocks – documented and signed	Weekly	Ops Manager
Incident register review	All incidents, near-misses, and corrective actions reviewed – trends identified and addressed	Monthly	Ops Manager + BDM
Training records audit	Verification that all staff training is current and no mandatory programmes are overdue	Monthly	Admin + Ops Manager
Compliance calendar review	Check all NEMA, DOSH, KEBS, and licence renewal dates are on track – escalate anything at risk	Monthly	BDM
Internal HSE audit	Full review of this policy and all HSE procedures against actual practice – gaps identified and corrected	Annually	BDM + Ops Manager
Policy review	This Health & Safety Policy formally reviewed, updated, and reissued by management	Annually or after any significant incident	CEO + BDM
NEMA annual inspection	Full regulatory inspection of the incineration facility – all records and documentation prepared in advance	Annually	BDM + Ops Manager

18. Policy Communication & Acknowledgement

This policy is effective from the date of management sign-off and applies immediately to all staff, contractors, and visitors. It must be communicated as follows:

- Every new member of staff reads and signs the acknowledgement form (below) before commencing duties
- The policy is reviewed with all existing staff annually — at the annual HSE briefing
- A printed copy is posted in the PWML facility in a clearly visible location at all times
- A digital copy is stored in the shared PWML staff folder and accessible to all staff
- Contractors are provided with a summary of relevant sections before commencing work at PWML
- The policy is made available to clients, NEMA, DOSH, and any regulatory body on request

Management Sign-Off

This policy has been approved and is effective from the date signed below

Position	Name	Signature & Date
Group CEO (GCEO)		
CEO		
Business Development Manager / Operations Manager		

Staff Acknowledgement Form

To be completed by every member of staff before commencing operational duties

I, the undersigned, confirm that:

- I have read and understood the Plenser Waste Management Limited Health & Safety Policy (Version 1.0, 2026)
- I understand my personal responsibilities under this policy

- I have had the opportunity to ask questions about any part of this policy
- I commit to following the requirements of this policy in all aspects of my work for PWML
- I understand that failure to comply with this policy may result in disciplinary action

Full Name	Role / Position	Date	Signature

"Safe disposal. Zero stress. Certified."