

## 1. PURPOSE AND COMMITMENT

At Shou'alah, health, safety, environmental protection and quality are core conditions of how we operate. They are not separate activities. They are built into the way we plan, procure, operate, maintain, monitor and improve the Dubai Waste-to-Energy facility.

As one team, Shou'alah operates as a Joint Venture between Kanadevia Inova and BESIX. We are united by a shared purpose to deliver reliable, sustainable waste-to-energy for Dubai, and to do it safely, compliantly and right first time.

This policy defines top management's commitment to an Integrated Management System that supports safe and healthy workplaces, prevention of pollution, reliable service delivery, customer and stakeholder satisfaction, legal compliance and continual improvement.

## 2. SCOPE

This policy applies to all Shou'alah employees, contractors, suppliers, service providers and visitors working for or on behalf of Shou'alah, including activities under Shou'alah control at the Dubai Waste-to-Energy facility and associated business activities.

This policy shall be communicated within Shou'alah, made available to workers, contractors and relevant interested parties, retained as documented information, and made publicly available where required or appropriate.

## 3. INTEGRATED POLICY COMMITMENTS

Shou'alah commits to the following requirements across all activities and decisions:

### 3.1. Leadership, accountability and culture

- Demonstrate visible leadership in health, safety, environment and quality through our decisions, behaviours, planning and performance reviews.
- Set clear roles, responsibilities, authorities, objectives and performance indicators so expectations are understood from senior management through to employees, contractors and suppliers.
- Promote a culture where people take ownership, speak up early, challenge unsafe, non-compliant or poor-quality work, and act before issues become failures.

### 3.2. Health, safety and wellbeing

- Provide safe and healthy working conditions for the prevention of work-related injury and ill health.
- Eliminate hazards and reduce health and safety risks using the hierarchy of controls.
- Maintain competent people, safe systems of work, effective risk assessment, operational controls, emergency preparedness and welfare arrangements that protect employees, contractors, visitors and neighbours.

| Document No.       | Revision | Page |
|--------------------|----------|------|
| DUB-SW-QHSE-PO-022 | 1        | 1/4  |

### 3.3. Stop Work Authority

- Every person on site has the authority and responsibility to stop work if they believe it is unsafe, environmentally uncontrolled, non-compliant or not in line with approved requirements.
- Work shall only restart when the risk is understood, the required controls are in place, and the responsible person has confirmed that it is safe and compliant to proceed.
- No person shall be penalised for stopping work in good faith. Stopping the job is not the end of the matter, the expectation is that the team makes the job safe, controlled and ready to continue in the right way.

### 3.4. Environmental protection and pollution prevention

- Protect the environment, including the prevention of pollution and other site-relevant environmental commitments, by maintaining disciplined controls for emissions, wastewater, chemicals and fuels, residues, odour, noise, litter, stormwater, resource use and other environmental aspects under Shou'alah's control or influence.
- Manage waste, residues and by-products through approved routes with correct classification, secure storage, full traceability and compliant off-takers only.
- Use energy, water and raw materials responsibly, and drive practical improvements that reduce environmental impact without compromising safety, compliance or operational integrity.

### 3.5. Quality and operational discipline

- Deliver reliable, safe and sustainable operations that meet applicable statutory, regulatory, contractual, client, customer and management system requirements.
- Understand customer, client and stakeholder expectations and work to meet agreed requirements consistently and right first time.
- Invest in quality assurance, effective planning, controlled documents, accurate data, clear handovers and robust checks to prevent defects, rework, delays and avoidable cost of poor quality.

### 3.6. Compliance obligations and governance

- Identify, maintain, evaluate and fulfil applicable compliance obligations, including laws, permits, consents, regulatory requirements, contractual obligations and other requirements accepted by Shou'alah.
- Maintain controlled registers of obligations, risks, objectives, nonconformities and corrective actions with clear ownership and review.
- Escalate early where legal, permit, environmental, safety, quality or operational control may be lost. We will not normalise drift or accept informal workarounds.

### 3.7. Risk, opportunity and asset integrity

- Identify and manage risks and opportunities that may affect safety, environmental performance, service conformity, operational reliability, compliance or customer satisfaction.
- Maintain the integrity of critical assets, systems and controls to support clean energy production while preventing harm to people, the environment and the community.
- Plan changes, shutdowns, maintenance and abnormal operations with adequate risk assessment, coordination, communication and control.

| Document No.       | Revision | Page |
|--------------------|----------|------|
| DUB-SW-QHSE-PO-022 | 1        | 2/4  |

INTEGRATED QUALITY, HEALTH, SAFETY AND ENVIRONMENTAL POLICY

**3.8. Competence, awareness and consultation**

- Provide competent people, appropriate training, awareness, instructions and supervision to support safe, compliant and efficient work.
- Consult with and encourage participation of workers and, where applicable, worker representatives in hazard identification, risk assessment, incident learning, environmental control and continual improvement
- Encourage constructive feedback and challenge on the implementation and effectiveness of this policy and the Integrated Management System.

**3.9. Contractor, supplier and service provider control**

- Select, qualify and monitor contractors, suppliers and service providers against technical, commercial, health, safety, environmental, quality and contractual requirements.
- Hold contractors and suppliers to Shou'alah expectations as a condition of working for or on behalf of the organisation.
- Intervene immediately where work, materials, waste, documentation, competence or controls do not meet approved requirements.

**3.10. Incident, nonconformity and corrective action**

- Report, investigate and learn from incidents, near misses, environmental events, nonconformities, audit findings, customer or stakeholder concerns and other system weaknesses.
- Assign corrective actions with owners and due dates, verify effectiveness and share lessons learned to prevent recurrence.
- Use inspections, audits, trend analysis, management review and performance data to strengthen routine control and reduce repeat failures.

**3.11. Objectives, monitoring and continual improvement**

- Establish, monitor and review measurable health, safety, environmental and quality objectives that are consistent with this policy and support Shou'alah's strategic direction.
- Maintain robust monitoring, measurement, calibration, verification and data integrity arrangements, including clear response rules for alarms, deviations, exceedances and abnormal conditions.
- Continually improve the suitability, adequacy and effectiveness of the Integrated Management System and our health, safety, environmental, quality and operational performance.

**4. INDIVIDUAL RESPONSIBILITY**

Every person working for or on behalf of Shou'alah is responsible for complying with this policy, following approved requirements, protecting themselves and others, preventing environmental harm, delivering quality work and escalating concerns immediately.

Managers and supervisors are accountable for implementing this policy in their areas, providing the resources and controls required, and ensuring that performance is reviewed and improved.

| Document No.       | Revision | Page |
|--------------------|----------|------|
| DUB-SW-QHSE-PO-022 | 1        | 3/4  |

## 5. APPROVAL

This policy is approved by the General Manager and shall be reviewed at least annually, or sooner following significant legal, organisational, operational, incident, audit or stakeholder changes.



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**Daniel Peters**  
**General Manager**