**PROCEDURE FOR CONSULTATION, PARTICIPATION AND COMMUNICATION**

<table>
<thead>
<tr>
<th>REV. NO.</th>
<th>DATE</th>
<th>BRIEF RECORD OF REVISIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>15-03-2011</td>
<td>Communication to other interested parties (Section 4.6.4)</td>
</tr>
<tr>
<td>0</td>
<td>16-04-2008</td>
<td>First issue</td>
</tr>
</tbody>
</table>

**REV. NO.**

**DATE**

**BRIEF RECORD OF REVISIONS**

**PREPARED BY** : HEAD - HSE

**SIGNATURE** : [Signature]

**NAME** : S N NARAYANAN

**APPROVED BY** : DIRECTOR (OPERATIONS)

**SIGNATURE** : [Signature]

**NAME** : V G JANARTHANAM
1.0 OBJECTIVE

To ensure pertinent information with respect to HSE related issues is communicated to/from employees & interested parties.

2.0 SCOPE

This procedure covers all activities performed at project sites and offices.

3.0 RESPONSIBILITY

As defined in the procedure.

4.0 PROCEDURE

Communication from various channels of Management are addressed as follows:

4.1 Communication is recognized as one of the key tools for the effective implementation and maintenance of a HSE Management System.

4.2 There are two types of communication in HSE Management:

a) Internal Communication
b) External Communication

4.3 Internal Communication

4.3.1 Information about HSE Policy will be distributed to all employees. The policy will be prominently displayed at key work places and Project Site Main gate. Important safety instructions will be prominently displayed in the passages and escape routes.

4.3.2 Information is shared in the Management Review Meetings. Minutes of MRM shall be distributed to concerned HODs and Safety Committee Members (OH & S relevant decisions) to make them aware of their roles in HSE MS. Results of external and internal Audits will be communicated to concerned HOD, Task & Support Task Force Members for corrective and preventive actions.
4.3.3. Latest notifications on safety & environment and legal aspects of CCCL operations will be communicated to all concerned. These are done by means of circulars issued by the Legal in-charges as well as through Intranet.

4.3.4. In addition to the MRMs, Safety Committee Meetings are held as per the requirements of OHS MS.

4.3.5. Half Yearly MRMs are held to review the status of minutes of previous MRMs, status of MPs, status of internal Audit and status of non conformities.

4.4 External Communication

4.4.1 Legal in-charges will deal with Environmental, Labour Inspectorates to address occupational Health, Safety and Environment related issues.

4.4.2 Sales/Purchase Department will undertake the following with regard to Customer communication :

a. Send customer feedback form to all customers once in 6 months to obtain their feedback. Specimen customer feedback form is at QMS.

b. In case customer feedback is not received, pursue with customer and obtain the same.

c. Collect customer opinion at the time of periodical meetings.

d. Analyse the customer feedback received immediately.

e. Initiate corrective and / or preventive actions immediately to eliminate the deficiency in service as pointed out by the customer.

f. Report actions taken on customer feedback analysis in the MRM.

g. Advise customers on actions taken to remove deficiency where appropriate.

4.4.3 On request from the public, a copy of HSE Policy is given by the security in-charge.
4.5 PARTICIPATION AND CONSULTATION

4.5.0 Ensuring the participation of workers and appropriate involvement in hazard identification, risk assessments, determination of controls, incident investigation, development & review of policy & objectives and consultation & representation on OH & S matters affecting their OH & S and also consultation with contractors where changes could affect their OH & S.

4.5.1 A Safety Committee has been constituted by drawing members from Managerial & Worker cadre, with a fixed tenure of 3 years or site life period. Apart from this, a Safety Stewards were drawn representing various areas, whose primary focus is to identify unsafe practices and unsafe conditions. Both these teams address OH & S related needs in “Bottom-Up” approach basis to the Top Management.

4.5.2 Head – HSE and PM evolves structured training plan and conduct periodically the required training in linguistic language for workers familiarity towards hazard identification, risk assessment, risk control methods and reporting of incidents. The proactive and reactive performance of OH & S system is also shared in such training delivery.

4.5.3 Site Safety Department conducts periodic toolbox meetings with contract workmen for enabling better work practices

4.5.4 The MRM minutes, particularly related to OH & S decisions are communicated to Safety Committee and Safety Stewards, so that the implementation is effective.

Top Management is also involved declaring safety award once in Quarter based on criteria such as

a. Safety Award Checklist 
b. Accidents at site 
c. Labour / Staff ratio

This approach is primarily adopted for creating competitive environment among the project sites in HSE at sites.

4.5.5 Site HSE Committee

Site HSE Committee consists of PM/SE and employees representatives as its members and PM as the convener.
4.5.6 Site HSE Committee discusses the following issues in its agenda:

   a) Development & review of HSE policy and procedures
   b) Changes that affect work place health & safety.
   c) Suggestions / complaints from employees.
   d) Status of HSE performance.
   e) Salient features of changes in the statutory & regulatory requirements.

4.5.7 SE to record the proceedings and communicate to all Site HSE – committee members and other concerned persons for necessary suitable action.

4.6 Communication to Interested parties

4.6.1 PM/SE to communicate the Interested parties with respect to;

   a) HSE Policy.
   b) HSE Procedures & operation control procedure.
   c) Emergency preparedness & responses

   PM/SE may communicate the above through display of posters.

4.6.2 PM to organize for providing a Register at the office / site office for enabling interested parties to record their concerns / suggestions. PM/SE to respond and initiate necessary actions.

4.6.3 PM/SE to organize for reply (as needed) to concerns/suggestions within a month and forward a copy to Head Office, Head - HSE management.

4.6.4 PM to communicate significant environmental aspects to the customer prior to start of the activity. Communication with respect to other interested parties on significant aspects arrived upon the discussion with Management on need basis. Modality of communication will also be decided.