

## Operational Energy Group India Limited

### **Personal Protective Equipment Policy**

#### **Policy:**

Management of OEG assumes responsibility for designing, planning and arranging work processes within the company so that safety hazards are eliminated or minimized. Where hazards cannot be completely eliminated through engineering controls and substitution of materials, management will provide the appropriate personal protection to the workers. Management will ensure that each worker is properly trained in and knowledgeable of the hazards associated with his/her work, the type of PPE required and its proper maintenance, care and use. OEG knows that safe employees and improved employee morale are but a couple of the many benefits of working safely and having an effective safety program. Personal Protective Equipment (here after called PPE) is one tool OEG uses in their effort to eliminate on the job injuries and illnesses. Our standards require that PPE be used by employees whenever workplace hazards are discovered that could damage any part of the body. In addition, OEG requires all employees to wear PPE, such as but not limited to, safety glasses, face shields, safety shoes, hearing protection (ear plugs/ear muffs), gloves, etc. as required by their job duties. PPE is to be used as a tool to eliminate and/or reduce the hazards employees face in their daily job duties.

All employees of The Company have and assume the responsibility of working safely.

The objective of this program is to:

- Provide safety standards specifically designed to cover Personal Protective Equipment (PPE).
- Ensure that each employee is trained and made aware of the safety procedures which are associated with Personal Protective Equipment (PPE).

  
**S. Ramesh**  
**Managing Director**



Page 1 of 9

**Registered Office :**  
A, 5th Floor, Gokul Arcade - East Wing,  
No. 2 & 2A, Sardar Patel Road, Adyar, Chennai - 600 020.  
Tel. : 044 - 4394 9300 (50 Lines)  
Fax : +91 - 44 - 2442 4156 [www.oegindia.com](http://www.oegindia.com)  
CIN : U40100TN1994FLC028309



NOTE: PPE is not to be used and will not be used as a substitute for safe work practices, machine guards, or other controls designed by equipment manufacturers or other engineering sources. PPE is to be used in conjunction with these controls to increase employee protection.

This program serves as a reinforcement of OEG commitment to the safety and health of its employees. Again, PPE is a tool, which when used correctly, reduces the hazards employees face on the job.

## Purpose

The purpose of the Personal Protective Equipment Policies is to protect the employees of OEG from exposure to work place hazards and the risk of injury through the use of personal protective equipment (PPE). PPE is not a substitute for more effective control methods and its use will be considered only when other means of protection against hazards are not adequate or feasible. It will be used in conjunction with other controls unless no other means of hazard control exist.

Personal protective equipment will be provided, used, and maintained when it has been determined that its use is required to ensure the safety and health of our employees and that such use will lessen the likelihood of occupational injury and/or illness.

This section addresses general PPE requirements, including eye and face, head, foot and leg, hand and arm, body protection.

OEG Personal Protective Equipment Policies includes:

- Responsibilities of supervisors and employees
- Hazard assessment and PPE selection
- Employee training
- Cleaning and Maintenance of PPE



**S. Ramesh**  
**Managing Director**



## Scope

The use of personal protective equipment (PPE) to reduce injuries is an important component. PPE includes all clothing and accessories designed to create a barrier against workplace hazards. PPE should be considered a means of minimizing the hazards after engineering controls, administrative controls, and safe work practices have been implemented.

## Responsibilities

It is the responsibility of each manager, supervisor, and employee to ensure implementation of the department policy on PPE. It is the responsibility of the department to provide and maintain equipment that is adequate and is safe in design and construction.

HSE Department/Department Managers is responsible for the development, implementation, and administration of OEG PPE policies. This involves

1. Conducting workplace hazard assessments to determine the presence of hazards which necessitate the use of PPE.
2. Selecting and purchasing PPE.
3. Reviewing, updating, and conducting PPE hazard assessments whenever
  - a job changes
  - new equipment is used
  - there has been an accident
  - a supervisor or employee requests it
4. Maintaining records on hazard assessments.
5. Maintaining records on PPE assignments and training.
6. Providing training, guidance, and assistance to supervisors and employees on the proper use, care, and cleaning of approved PPE.

  
**S. Ramesh**  
**Managing Director**



Page 3 of 9

7. Periodically re-evaluating the suitability of previously selected PPE.
8. Reviewing, updating, and evaluating the overall effectiveness of PPE use, training, and policies.

Supervisors have the primary responsibility for implementing and enforcing PPE use and policies in their work area. This involves

1. Providing appropriate PPE and making it available to employees.
2. Ensuring that employees are trained on the proper use, care, and cleaning of PPE.
3. Ensuring that PPE training certification and evaluation forms are signed and given to HSE Department.
4. Ensuring that employees properly use and maintain their PPE, and follow PPE policies and rules.
5. Notifying OEG management and the Safety Department when new hazards are introduced or when processes are added or changed.
6. Ensuring that defective or damaged PPE is immediately surrender to HSE Department and replaced.

## Employees

The PPE user is responsible for following the requirements of the PPE policies. This involves

7. Properly wearing PPE as required.
8. Attending required training sessions.
9. Properly caring for, cleaning, maintaining, and inspecting PPE as required.
10. Following OEG PPE policies and rules.
11. Informing the supervisor of the need to repair or replace PPE.

Employees who repeatedly disregard and do not follow PPE policies and rules will be given disciplinary action.

  
**S. Ramesh**  
**Managing Director**



Page 4 of 9

## Procedures

### A. Hazard Assessment for PPE

HSE Department/Department Manager/Plant Manager in conjunction with Supervisors, will conduct a walk-through survey of each work area to identify sources of work hazards. Each survey will be documented using the Hazard Assessment Certification Form, which identifies the work area surveyed, the person conducting the survey, findings of potential hazards, and date of the survey.

HSE Department/Department Manager/Plant Manager will conduct, review, and update the hazard assessment for PPE whenever

- a job changes
- new equipment or process is installed
- there has been an accident
- whenever a supervisor or employee requests it
- or at least every year

Any new PPE requirements that are developed will be added into written accident prevention program.

The following safety guidelines should be adhered to, to maximize worker health and safety:

1. Always inspect the personal protective equipment prior to use.
2. Wear only the type of PPE your supervisor specifies as appropriate for the job. Inappropriate and improperly worn PPE can result in injury, illness and damage to equipment resulting in high costs to both you and the company.
3. Be certain your PPE fits properly, especially in the case of hearing or respiratory protection.
4. Keep personal protective equipment clean and store in designated container or location when not in use.

  
**S. Ramesh**  
**Managing Director**



5. If you are uncertain as to how to wear or operate the required personal protective equipment, immediately ask your supervisor for assistance.

## B. Selection of PPE

Once the hazards of a workplace have been identified HSE Dept./Department Managers will determine if the hazards can first be eliminated or reduced by methods other than PPE, i.e., methods that do not rely on employee behavior, such as engineering controls.

If such methods are not adequate or feasible, then HSE Dept./Respective Department will determine the suitability of the PPE presently available; and as necessary, will select new or additional equipment which ensures a level of protection greater than the minimum required to protect our employees from the hazards. Care will be taken to recognize the possibility of multiple and simultaneous exposure to a variety of hazards. Adequate protection against the highest level of each of the hazards will be recommended for purchase.

All personal protective clothing and equipment will be of safe design and construction for the work to be performed and will be maintained in a sanitary and reliable condition. Only those items of protective clothing and equipment that meet ANSI (American National Standards Institute) standards will be procured or accepted for use. Newly purchased PPE must conform to the updated ANSI standards which have been incorporated into the PPE regulations, as follows:

- Eye and Face Protection ANSI Z87.1-1989
- Head Protection ANSI Z89.1-1986
- Foot Protection ANSI Z41.1-1991
- Hand Protection (There are no ANSI standards for gloves, however, selection must be based on the performance characteristics of the glove in relation to the tasks to be performed.)

Affected employees whose jobs require the use of PPE will be informed of the PPE selection and will be provided PPE by OEG at no charge. Careful consideration will be given to the comfort and proper fit of PPE in order to ensure that the right size is selected and that it will be used.



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## C. Training

Any worker required to wear PPE will receive training in the proper use and care of PPE before being allowed to perform work requiring the use of PPE. Periodic retraining will be offered to PPE users as needed. The training will include, but not necessarily be limited to, the following subjects:

- When PPE is necessary to be worn
- What PPE is necessary
- How to properly don, doff, adjust, and wear PPE
- The limitations of the PPE
- The proper care, maintenance, useful life, and disposal of the PPE

After the training, the employees will demonstrate that they understand how to use PPE properly, or they will be retrained.

Training of each employee will be documented using the Personal Protective Equipment Training Documentation Form and kept on file. The document certifies that the employee has received and understood the required training on the specific PPE he/she will be using.

## Retraining

The need for retraining will be indicated when

- an employee's work habits or knowledge indicates a lack of the necessary understanding, motivation, and skills required to use the PPE (i.e., uses PPE improperly)
- new equipment is installed
- changes in the work place make previous training out-of-date
- changes in the types of PPE to be used make previous training out-of-date



**S. Ramesh**  
**Managing Director**



## D. Cleaning and Maintenance of PPE

PPE is not to be used for purposes other than its intended use. For example, do not use a hard-hat as a hammer or a fall-protection harness as a tow-rope. Employees must inspect each piece of equipment to make sure it is free of cracks, broken components or damaged components before and after each use. Store PPE in safe locations so that the PPE will not be damaged when it is not in use. PPE used properly, maintained properly, stored properly, and taken out of service when its useful life has expired will be more beneficial to the wearer.

It is important that all PPE be kept clean and properly maintained. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. Employees must inspect, clean, and maintain their PPE according to the manufacturers' instructions before and after each use. Supervisors in respective departments are responsible for ensuring that users properly maintain their PPE in good condition.

Personal protective equipment must not be shared between employees until it has been properly cleaned and sanitized. PPE will be distributed for individual use whenever possible.

Defective or damaged PPE will not be used and will be immediately discarded and replaced.

**NOTE:** *Defective equipment can be worse than no PPE at all. Employees would avoid a hazardous situation if they knew they were not protected; but they would get closer to the hazard if they erroneously believed they were protected, and therefore would be at greater risk.*

It is also important to ensure that contaminated PPE which cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.



**S. Ramesh**  
**Managing Director**





## E. Safety Disciplinary Policy

OEG believes that a safety and health Accident Prevention Program is unenforceable without some type of disciplinary policy. Our company believes that in order to maintain a safe and healthful workplace, the employees must be aware of all company, safety and health regulations as they apply to the specific job duties required. The following disciplinary policy is in effect and will be applied to all safety and health violations.

The following steps will be followed unless the seriousness of the violation.

1. A first-time violation will be discussed orally between company supervision and the employee. This will be done as soon as possible.
2. A second time offense will be followed up in written form and a copy of this written documentation will be entered into the employee's personnel folder.
3. A third time violation will result in time off or possible termination, depending on the seriousness of the violation.

## Replacement of PPE

There are however some basic warning signs that PPE needs replacing such as, rips, tears, holes, discoloration, degrading and soiling. As an employer it's also your responsibility to train your staff about how to use, care and store their PPE, to ensure optimal safe usage and disposal of the product.

In the event that PPE does need to be replaced it's a good idea to have suitable replacement PPE on hand. It may also be useful to have disposable PPE available for any visitors that may also require protecting.

PPE is there to minimize any risks to your staff so it's best to keep a close eye on how your employees treat, care for and use their PPE.

  
**S. Ramesh**  
**Managing Director**

