



Our QHSE Policy is;

“We are committed to establish and develop Quality, Health and Safety and Environment system. Our Quality Management System is to ensure that our products are services are consistently suited to the requirements of our customers and delivered in a way that increases their satisfaction.

Our Environment Management system is committed to comply with relevant environmental legislation and regulations of Syrian Government as well as our customers.

Our OHSAS policy is to ensure that we adhere to the strictest practices of safety for all including our employees as well as all other stakeholders.

We are committed to establish and review core objectives in the area of QHSE (Quality, Health, Safety and Environment) and broadcast to all, monitor these objectives on a quarterly basis.

We shall also commit to review our policy and plans related to QHSE annually in the framework of changing requirements and modify the same to make it relevant and useful.”

Our core values are;

1. Belief in our human resource
2. Commitment to our promises
3. Investment in R & D
4. Customers first, forever
5. Satisfaction by being more accountable than profitable
6. Comply with applicable legal requirements
7. Prevent pollution by minimizing and managing waste
8. Prevent injury and ill health by minimizing and managing risks
9. Continually improve the effectiveness of integrated management system



5.4.3 Identification of Environmental Aspects

IFTT has established a documented procedure **“EHS MANAGEMENT OCP-01”** to identify the environmental aspects of its activities, products and services within the

defined scope of the IMS that it can control and those it can influence taking in to account planned or new development or new or modified activities, products and services and to determine those activities that can have significant impact(s) on the environment (significant environmental aspects).

These significant aspects are considered while establishing the objectives, targets, EMP's and operational control procedure in order to control them. The analysis results are documented in **“EHS-01 Aspect Impact Analysis”**.

Planning for Hazard Identification, Risk Assessment and Risk Control

IFTT has established a documented procedure **“EHS MANAGEMENT OCP-01”** for the ongoing identification of hazard, assessment of the risks and implementation of necessary risk control measures. It includes;

- a) Routine and non-routine activities;
- b) Activities of all persons having access to the workplace (including contractors and visitors);
- c) Human behavior, capabilities and other human factors;
- d) Identified hazards originating outside the workplace capable of adversely affecting the health and safety of persons under the control of the organization within the workplace;
- e) Hazards created in the vicinity of the workplace by work-related activities under the control of the organization;



- f) infrastructure, equipment and materials at the workplace, whether provided by the organization or others;
- g) Changes or proposed changes in the organization, its activities, or materials;
- h) Modifications to the OH&S management system, including temporary changes, and their impacts on operations, processes, and activities;
- i) Any applicable legal obligations related to risk assessment and implementation of necessary controls
- j) Design of work areas, processes, installations, machinery/equipment, operating procedures and work organization, including their adaptation to human capabilities.

The results of these assessments are considered when determining controls. These risks and controls are considered while establishing the objectives, targets and operational control procedure in order to control them. The analysis results are documented in **“EHS-02 Hazard Identification and Risk Analysis”**.

This documented procedure is established in line with the following guidelines;

- a) Define the scope, nature and timing to ensure that it is pro-active rather than reactive
- b) Provide the classification of risks and identification of those that need to be eliminated or controlled by objectives and targets or operational control measures
- c) Be consistent with operating experience and the capabilities of risk control measures employed
- d) Provide input to training need assessment
- e) Define the monitoring mechanism of the required actions to ensure both the effectiveness and timelines of their implementation

This procedure also ensures that when determining controls considering changes to existing controls, consideration shall be given to reducing the risks according to the following hierarchy:

- a) elimination;
- b) substitution;



- c) engineering controls;
- d) signage/warnings and/or administrative controls;
- e) personal protective equipment

OHSAS – Participation and Consultation

IFTT has established and implemented a procedure “**EHS MANAGEMENT OCP-01**” which describes the participation of workers by their:

- a) Appropriate involvement in hazard identification, risk assessments and determination of controls;
- b) Appropriate involvement in incident investigation;
- c) Involvement in the development and review of OH&S policies and objectives
- d) Consultation where there are any changes that affect their OH&S;
- e) Representation on OH&S matters.

Workers are informed about their participation arrangements, including who is their representative on OH&S matters.

This procedure also includes methods for consultation with contractors where there are changes that affect their OH&S and also ensures that, when appropriate, relevant external interested parties are consulted about pertinent OH&S matters.

Operational Control – EMS / OHSAS

IFTT has determined those operations and activities that are associated with the identified significant aspects and hazards where the implementation of controls is necessary to manage the IMS which include the management of change in order to ensure that they are carried out under specified conditions. IFTT has also established and implemented the necessary controls for those operations and activities and the controls include:



- a) Operational controls, as applicable to the organization and its activities
- b) Controls related to purchased goods, equipment and services
- c) Controls related to contractors and other visitors to the workplace
- d) Documented procedures with respect to the identified significant aspects and hazards, to cover situations where their absence could lead to deviations from the IMS policy and the objectives;
- e) Stipulated operating criteria where their absence could lead to deviations from the IMS policy and objectives.
- f) Methods for communicating the applicable procedures and requirements to suppliers, including contractors.

Refer **“OCP-01 EHS Management”** and **“MMP-01 Monitoring and Measurement Plan”**.

Emergency Preparedness and Response

IFTT has established and implemented through a documented procedure **“OCP-02 Emergency Preparedness and Response”**, the methods to:

- a) Identify the potential for emergency situations, potential accidents that can have an impact on the environment and health & safety of the personnel and to respond to such emergency situations.
- b) Respond to actual emergency situations and prevent or mitigate associated adverse consequences with respect to environment, health & safety.
- c) Consider the needs of relevant interested parties, e.g. emergency services and neighbours for planning its emergency response
- d) Periodically test its procedure to respond to emergency situations, where feasible, involving relevant interested parties as appropriate.



- e) Periodically review and, where necessary, revise its emergency preparedness and response procedures, in particular, after periodical testing and after the occurrence of emergency situations.

MEASUREMENT, ANALYSIS AND IMPROVEMENT

General

IFTT has established and implemented the Monitoring, Measurement, Analysis and Improvement processes through a documented procedure for demonstrating conformity of product, environment, health & safety requirements and continually improving the effectiveness of IMS. These processes include;

- a) Key characteristics of its operations which include both qualitative and quantitative measures
- b) Performance of IMS which include the effectiveness of controls
- c) Conformity with IMS objectives and targets
- d) Proactive measures of performance that monitor conformance with the management programmes, operational controls and operational criteria;
- e) Reactive measures of performance that monitor ill health, incidents (including accidents, near-misses, etc.), and other historical evidence of deficient OH&S performance;

Refer **“SOP-02-Operations”, “SOP-04 Purchase & Stores”, “SOP-07 After Sales Service” and “MMP-01 Monitoring and Measurement Plan”**.

Control of Nonconforming Products and Incident Investigation

IFTT has established documented procedure **“Control of Non Conformance and Corrective & Preventive Action IMS-04”** to ensure that products / services which do not conform to its specified requirements are suitably identified and controlled to prevent their unintended use or delivery. The procedure includes the controls and related responsibilities and authorities for dealing with the non-conforming products / services.

The organization ensures that the non-conformities are dealt in one or more of the following ways and maintains relevant records by;

- a) Taking action to eliminate the detected nonconformity
- b) Authorizing its use, release or acceptance under concession by a relevant authority and, where applicable, by the customer;



- c) Taking action to preclude its original intended use or application;
- d) Taking action appropriate to the effects, or potential effects, of the nonconformity when nonconforming product is detected after delivery or use has started.

When nonconforming product is corrected it shall be subject to re-verification to demonstrate conformity to the requirements.

IFTT has established and implemented a procedure to record, investigate and analyses incidents in order to:

- a) Determine underlying OH&S deficiencies and other factors that might be causing or contributing to the occurrence of incidents;
- b) Identify the need for corrective action;
- c) Identify opportunities for preventive action;
- d) Identify opportunities for continual improvement;
- e) Communicate the results of such investigations.

IFTT also ensures that the investigations are performed in a timely manner and any need identified for corrective action or opportunities for preventive action are dealt with as per the procedure. The results of incident investigations are documented and maintained.

Analysis of Data

IFTT determines, collects and analyses appropriate data to demonstrate the suitability and effectiveness of the Integrated Management Systems and evaluates the continual improvement of IMS. The data is collected at periodic intervals which is then analyzed and trends are identified. The results form as input and are reviewed during management review for identifying corrective and preventive action for improving the effectiveness of IMS. These data include;



- a) Data generated as a result of product / process monitoring and measurement which include conformance to product requirements, characteristics and their trends in processes and products
- b) Data generated as a part of monitoring the objectives and targets
- c) Feedback received from the customers which include customer satisfaction and complaints
- d) Accident / Incident trends
- e) Occupational health and related medical history
- f) Regulatory compliance status and emergencies

Improvement

Continual Improvement

IFTT has determined the scope for Continual Improvement in the Integrated Management System by establishing various methods. Continual Improvement is ensured by reviewing the results of IMS objectives, internal audits, analysis of data, corrective and preventive action and the performance of IMS during the Management review meeting. These results provide the scope to continually improve the effectiveness of the Integrated Management system.

Corrective Action

IFTT has established a documented procedure “**Control of Non Conformance and Corrective & Preventive Action IMS-04**” for taking actions to eliminate the root causes of non-conformities in order to prevent their recurrence. This procedure includes the methods for analyzing and taking corrective action on the trends in non-conformities observed during internal audits, incoming inspections, installation process, final inspection, customer complaint, delivery performance,



process capability, supplier performance, customer satisfaction, accidents, variations observed in environmental characteristics, emergencies etc. to eliminate root causes of non-conformities. It also facilitates to make changes in the procedure if necessary after taking corrective action.

The controls established include;

- a) Reviewing the non-conformities (including customer complaints) / EHS non-conformances,
- b) Determining the causes for non-conformities,
- c) Evaluating the need for action based on criticality of the activities, magnitude of the problems, magnitude of the environmental impacts & risks encountered to ensure that non-conformities do not recur,
- d) Determining, deciding the corrective action needed based on the root cause analysis and implementing the same in order to prevent the recurrence of product non-conformities and to mitigate the OH&S consequences and environmental impacts
- e) Maintaining the records of the results from the action taken and
- f) Reviewing corrective action taken for their effectiveness.

Preventive Action

IFTT has established a documented procedure “**Control of Non Conformance and Corrective & Preventive Action IMS-04**” for taking actions to eliminate the causes of potential non-conformities in order to prevent their occurrence. This procedure includes the methods for analyzing and taking preventive action on the trends in non-conformities observed during internal audits, incoming inspections, installation process, final inspection, customer complaints, delivery performance, process capability, supplier performance, customer satisfaction, accidents, variations observed in



environmental characteristics, emergencies etc. to eliminate potential causes of non-conformities. It also facilitates to make changes in the procedure, if necessary, after taking preventive action.

The controls established include;

- a) Determining potential product / EHS non-conformities and their causes,
- b) Evaluating the need for action based on potential problems in the activities to ensure that non-conformities may not occur,
- c) Determining the causes of non-conformities by using problem solving techniques,
- d) Evaluating the need for action based on criticality of the activities, magnitude of the problems, magnitude of the environmental impacts & risks encountered to ensure that non-conformities do not occur.
- g) Determining, deciding the preventive action needed based on root cause analysis and implementing the same, in order to prevent the occurrence of product non-conformities and to mitigate the OH&S consequences and environmental impacts
- e) Maintaining the records of the results from the action taken and
- f) Reviewing preventive actions taken for their effectiveness.

IFTT has also established methods for intermittent risk assessment of proposed actions, whenever the corrective action and preventive action identifies new or changed hazards or the need for new or changed controls, prior to implementation. It also ensures that any necessary changes arising from corrective action and preventive action are made to IMS documentation.
