

# ATLAS INTERNATIONAL TRANSPORT & GENERAL CONTRACTING LLC

## HEALTH, SAFETY & ENVIRONMENT POLICY

*Committed to Zero Harm — On Water, On Land, In Every Operation*

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<b>Prepared By</b>	HSE Manager
<b>Reviewed By</b>	Operations Director / Manager
<b>Approved By</b>	Chief Executive Officer
<b>Classification</b>	Company Controlled Document

**Atlas International Transport & General Contracting LLC**  
Abu Dhabi, United Arab Emirates



*Atlas International Transport & General Contracting LLC*

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## 1.0 Purpose & Scope

This Health, Safety and Environment (HSE) Policy establishes the framework, principles, and commitments of Advanced International Marine Company LLC (hereinafter "the Company") for managing health, safety, and environmental performance across all its operations.

### This policy applies to:

- All permanent and temporary employees of the Company.
- All subcontractors, vendors, and third-party personnel working on Company projects.
- All marine and onshore construction activities including dredging, piling, jetty and berth construction, offshore installations, subsea pipeline works, and coastal protection.
- All vessels, barges, equipment, and facilities owned or operated by the Company.
- All geographic locations where the Company conducts business.

This policy is aligned with and supports compliance with ISO 45001:2018 (Occupational Health & Safety Management Systems), ISO 14001:2015 (Environmental Management Systems), and the ISM Code (International Safety Management Code) as applicable to marine operations.

## 2.0 Company Background

Atlas International Transport & General Contracting LLC is a specialist marine and coastal construction company operating across the Middle East, with headquarters in Abu Dhabi, UAE. The Company provides a full range of marine construction services including:

ATLAS CORE ACTIVITIES	
<ul style="list-style-type: none"> <li>• <b>Dredging &amp; Reclamation</b></li> <li>• Capital &amp; Maintenance Dredging</li> <li>• Port, Marina &amp; Harbour Dredging</li> <li>• Land Reclamation</li> <li>• Beach Renourishment</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Beach &amp; Shore Protection</b></li> <li>• Environmental Mitigation Works</li> <li>• Rock Breakwater &amp; Revetment Construction</li> <li>• Gas/Oil Dredging &amp; Pipeline Installation</li> <li>• Marine Civil Engineering Projects</li> </ul>

Our operations involve complex environments — open sea, tidal zones, confined spaces aboard vessels, and simultaneous land-sea interfaces — presenting unique hazards that demand the highest standards of HSE management.

### 3.0 HSE Vision, Mission & Values

<b>HSE Vision</b>	<i>Zero harm to people, zero damage to the environment — every project, every day.</i>
<b>HSE Mission</b>	To protect our people, communities, and natural environment through a proactive, risk-based HSE culture that is embedded at every level of our organisation.
<b>Core HSE Values</b>	<ul style="list-style-type: none"> <li>• <b>Leadership Commitment</b> — HSE is a management priority, not a department function</li> <li>• <b>Personal Accountability</b> — every individual is responsible for their own and others' safety</li> <li>• <b>Continuous Improvement</b> — we learn from incidents, audits, and best practice</li> <li>• <b>Respect for Environment</b> — we minimise our environmental footprint on every project</li> </ul>



## 4.0 Policy Statement

*Atlas International Transport & General Contracting LLC is committed to conducting all marine construction operations in a manner that protects the health and safety of our employees, contractors, clients, and the public, and that preserves and respects the marine and coastal environment in which we work.*

In fulfilment of this commitment, the Company pledges to:

- Comply with all applicable local, national, and international laws, regulations, standards, and codes governing health, safety, and environmental performance, including UAE Federal Law No. 8 of 1980, UAE Federal Law No. 24 of 1999 on Environmental Protection, ADNOC HSE regulations, IMO conventions, and MARPOL requirements.
- Identify, assess, and control risks associated with marine construction activities to eliminate or reduce hazards to the lowest practicable level.
- Prevent work-related injury, ill-health, and occupational disease through robust occupational health programmes and hazard elimination.
- Prevent marine pollution and minimise emissions, waste, noise, turbidity, and other environmental impacts from our operations.
- Establish and pursue measurable HSE objectives and targets that drive continual improvement.
- Allocate adequate human, financial, and technical resources to implement and sustain this policy.
- Foster an open HSE culture where all personnel are encouraged and empowered to raise concerns, report hazards, and stop unsafe work without fear of reprisal.
- Consult and communicate with workers and their representatives on HSE matters that affect them.
- Ensure all personnel are competent, trained, and equipped to perform their duties safely.
- Apply international best practices and industry standards including IMCA, IOGP, and CIRIA guidelines for marine construction safety.
- Review this policy at least annually and update it to reflect changes in operations, legislation, or organisational context.

*This policy is communicated to all personnel, displayed prominently at all project sites and vessels, made available to stakeholders upon request, and is reviewed by Senior Management at defined intervals.*

## 5.0 HSE Objectives & Targets

The Company establishes annual HSE objectives and targets consistent with this policy. Current strategic HSE objectives include:

Objective	Target	KPI
Zero fatalities and Life-Altering Injuries	0 fatalities or permanent disability	TRIR, LTI Frequency Rate
Reduce Total Recordable Incident Rate	TRIR < 0.5 per 200,000 manhours	Monthly TRIR reporting
Eliminate Marine Pollution Incidents	0 MARPOL reportable spills	Spill frequency & volume
100% HSE Induction Compliance	100% of workers inducted before mobilisation	Induction completion records
Near-Miss Reporting Culture	Minimum 10 near-miss reports per month	Near-miss reports logged
Environmental Legal Compliance	Zero environmental enforcement notices	Regulatory audit results
HSE Training Completion	100% of planned training delivered on time	Training matrix completion %



## 6.0 Roles & Responsibilities

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### 6.1 Chief Executive Officer (CEO)

- Holds ultimate accountability for HSE performance across the Company.
- Approves and endorses this HSE Policy.
- Ensures adequate resources are allocated to HSE functions.
- Promotes HSE leadership and visible commitment at all levels.
- Reviews HSE performance through quarterly management reviews.

### 6.2 Operations Director / Manager

- Ensures HSE requirements are incorporated into all project planning and execution.
- Reviews and approves project-specific HSE plans and method statements.
- Monitors compliance with this policy across all projects.
- Supports the HSE Manager in implementing corrective actions.

### 6.3 HSE Manager

- Develops, implements, and maintains the Company HSE Management System.
- Provides HSE guidance, advice, and support to all departments and projects.
- Coordinates incident investigation and corrective action tracking.
- Ensures legal and regulatory compliance is maintained and monitored.
- Prepares and submits HSE performance reports to senior management.
- Conducts and coordinates internal HSE audits and inspections.
- Manages HSE training programmes and competency frameworks.

### 6.4 Project Managers

- Responsible for implementing this policy on their assigned projects.
- Ensure HSE is integrated into project programmes, budgets, and risk registers.
- Chair project HSE meetings and conduct regular site HSE inspections.
- Enforce stop-work authority when life-threatening conditions are observed.
- Report all incidents to the HSE Manager within required timeframes.

### 6.5 Marine Superintendents / Vessel Masters

- Responsible for the safety and environmental compliance of all vessel operations.
- Ensure compliance with ISM Code, SOLAS, MARPOL, and flag state requirements.
- Conduct pre-departure safety briefings and emergency drills.
- Maintain vessel safety management system documentation.
- Report near misses, hazardous conditions, and environmental incidents immediately.

### 6.6 All Employees, Subcontractors & Visitors

- Take reasonable care of their own health and safety and that of others.
- Follow all HSE rules, procedures, and safe work practices.
- Use personal protective equipment as required.
- Report all incidents, near misses, and unsafe conditions without delay.
- Exercise stop-work authority and refuse to perform unsafe work.
- Participate in HSE meetings, toolbox talks, and training as required.
- Not operate any equipment for which they have not received authorisation.

## 7.0 Legal & Regulatory Compliance

The Company is committed to identifying and complying with all applicable legal, regulatory, and other requirements. Key legislation and standards governing our operations include:

### UAE National Legislation

- UAE Federal Law No. 8 of 1980 — Labour Law and Amendments
- UAE Federal Law No. 24 of 1999 — Protection and Development of the Environment
- UAE Cabinet Resolution No. 37 of 2009 — HSE Regulations in Industrial Facilities
- Abu Dhabi Law No. 21 of 2005 — Environmental Affairs
- ADNOC Group HSE Standards (where applicable as client/project requirement)

### International Maritime Standards

- ISM Code (International Safety Management Code) — IMO Resolution A.741(18)
- SOLAS Convention — Safety of Life at Sea
- MARPOL 73/78 — Prevention of Marine Pollution
- MLC 2006 — Maritime Labour Convention (for seafarers)
- STCW Convention — Standards of Training, Certification & Watchkeeping

### International HSE Standards

- ISO 45001:2018 — Occupational Health & Safety Management Systems
- ISO 14001:2015 — Environmental Management Systems
- ISO 9001:2015 — Quality Management Systems
- IMCA (International Marine Contractors Association) guidelines and guidance notes
- IOGP (International Association of Oil & Gas Producers) Safety Standards

## 8.0 Risk Management

The Company applies a systematic risk management approach based on the Hierarchy of Controls to all activities. All significant hazards must be assessed before work commences.

### 8.1 Hazard Identification & Risk Assessment

- Formal risk assessments (Job Safety Analysis / HAZID / HAZOP) are mandatory for all marine construction activities
- Risk assessments must be reviewed before any scope change, new hazard identification, or incident occurrence
- Dynamic risk assessment must be applied when conditions change unexpectedly
- Risk matrices are used to classify risks as Low, Medium, High, or Critical, with intolerable risks requiring immediate controls before work proceeds

### 8.2 Critical Controls

- Safe Work Permits are mandatory for all high-risk activities including hot work, confined space entry, work at height, diving operations, and lifting operations
- Simultaneous Operations (SIMOPS) assessments are required wherever two or more potentially conflicting activities occur concurrently
- Management of Change (MOC) procedures are applied to any change in equipment, personnel, scope, or procedure that could affect HSE

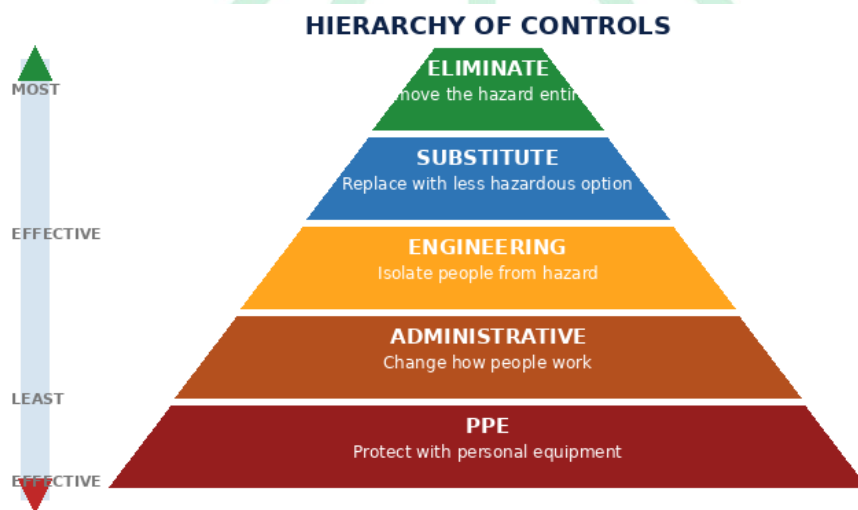
### 8.3 Life-Saving Rules

The following Life-Saving Rules are absolute requirements — violation of any rule is grounds for immediate removal from site and disciplinary action:

- Work at height: always use fall protection above 1.8 metres.
- Confined space: never enter without a valid permit and atmospheric testing.
- Lifting: never stand under a suspended load.
- Vessel safety: always wear a Personal Flotation Device (PFD) on open decks at sea.
- Diving: never dive without a fully equipped standby diver in the water.
- Alcohol & drugs: never work under the influence of any substance.
- Driving: always wear a seatbelt; never use a mobile phone while driving.



Atlas International Transport & General Contracting LLC — Life-Saving Rules Summary



Hierarchy of Controls — Preferred Approach to Risk Elimination

## 9.0 Marine-Specific Hazard Controls

Marine construction operations present unique and elevated hazards compared to conventional construction. The following hazard control requirements are specific to marine operations:

Man Overboard (MOB) Prevention & Response
<ul style="list-style-type: none"> <li>■ Guardrails and safety nets to be installed on all vessel deck edges and work platforms over water.</li> </ul>
<ul style="list-style-type: none"> <li>■ Personal Flotation Devices (PFDs) mandatory on all open decks during vessel transit and marine construction operations.</li> </ul>
<ul style="list-style-type: none"> <li>■ MOB rescue equipment (life rings, throw bags, rescue boat) to be ready and accessible at all times.</li> </ul>
<ul style="list-style-type: none"> <li>■ MOB drills to be conducted monthly on all crewed vessels.</li> </ul>
<ul style="list-style-type: none"> <li>■ Personnel accountability through muster lists and headcounts at defined intervals.</li> </ul>



*Man Overboard — Emergency Response Sequence*

Diving Operations
<ul style="list-style-type: none"> <li>■ All diving operations to comply with IMCA D 014 and UAE Federal Law requirements.</li> </ul>
<ul style="list-style-type: none"> <li>■ Minimum crew: Diving Supervisor, Diver, Standby Diver, Dive Tender, and Diving Medic for saturation operations.</li> </ul>
<ul style="list-style-type: none"> <li>■ Pre-dive planning, risk assessment, and dive plan approval required before every dive.</li> </ul>
<ul style="list-style-type: none"> <li>■ Diving medical fitness certificate required for all divers (valid within 12 months).</li> </ul>
<ul style="list-style-type: none"> <li>■ Surface Decompression (SDC) and recompression facilities to be available for deeper diving operations.</li> </ul>

### Vessel & Barge Safety

- All vessels to hold valid flag state, classification society, and port state certificates.
- Safe manning documents to be complied with at all times.
- ISM Safety Management System to be maintained and audited in accordance with the ISM Code.
- Pre-departure safety checks, weather monitoring, and passage planning mandatory for all transits.
- Drug and alcohol testing programme to be maintained for all vessel crew.

### Heavy Lifting & Marine Crane Operations

- All lifts over 1 tonne to have a Lift Plan prepared by a competent Lifting Supervisor.
- Critical lifts (load > 75% SWL, tandem lifts, lifts over personnel) require a Lifting Engineer sign-off.
- Cranes and rigging equipment to be inspected by a third-party competent person annually.
- Exclusion zones to be enforced beneath all suspended loads.
- Marine crane operations subject to sea state, wind speed, and vessel motion limitations defined in the Lift Plan.

### Working in Extreme Heat (UAE Climate)

- Summer Working Hours Ban: no outdoor heavy work between 12:30 PM and 3:00 PM (June 15 – September 15) in accordance with UAE Ministry of Human Resources directive.
- Heat stress risk assessment mandatory for all outdoor marine operations above 35°C WBGT.
- Rest, rehydration, and shade stations to be provided at all marine construction sites and work barges.
- Workers to be trained in recognition and response to heat exhaustion and heat stroke.
- Buddy system mandatory during high-heat operations.

### MANDATORY PPE — ALL MARINE CONSTRUCTION SITES

							
<b>Hard Hat</b> Class E rated	<b>Safety Glasses</b> ANSI Z87.1	<b>Hi-Vis Vest</b> Class 3	<b>Safety Gloves</b> Cut-resistant	<b>Safety Boots</b> Steel-toed	<b>Life Jacket</b> On open decks	<b>Hearing Protection</b> 85 dB+ zones	<b>Respirator</b> Confined spaces

Mandatory PPE Requirements — All Marine Construction Sites & Vessels

## 10.0 Environmental Management

The Company recognises that marine construction activities can significantly affect the marine and coastal environment. We are committed to minimising our environmental impact through proactive management of the following:



*Environmental Protection Commitments — Atlas International Transport & General Contracting LLC*

### 10.1 Marine Pollution Prevention

- Zero discharge policy for all oil, fuel, and hazardous substances into the marine environment
- All vessels to maintain MARPOL Oil Record Books and Garbage Management Plans
- Spill response kits to be maintained on all vessels and marine worksites
- Secondary containment to be provided for all fuel and chemical storage on barges and pontoons
- Bilge water to be treated and disposed of in accordance with MARPOL Annex I requirements

### 10.2 Dredging & Turbidity Management

- Turbidity monitoring to be conducted throughout dredging operations
- Silt curtains to be deployed to limit turbidity plume spread where required by environmental permits
- Dredge disposal sites to be authorised by competent authorities and disposal records maintained

### 10.3 Waste Management

- Waste minimisation hierarchy (reduce, reuse, recycle, recover, dispose) to be applied on all projects
- Waste segregation at source: general waste, hazardous waste, recyclables, food waste
- Waste manifests and disposal records to be maintained for all hazardous waste streams

### 10.4 Biodiversity & Protected Species

- Environmental Impact Assessments to be reviewed before commencing work in environmentally sensitive areas
- Marine mammal and turtle watch protocols to be followed during piling and dredging operations
- Artificial reef and habitat mitigation measures to be implemented where required by permits

### 10.5 Carbon & Emissions Management

- Fuel consumption monitoring on all vessels and equipment to track and reduce carbon emissions
- Engine idling reduction measures to be implemented on all project sites
- Preference for low-emission equipment and vessels during procurement where technically feasible

## 11.0 Emergency Preparedness & Response

The Company maintains comprehensive Emergency Response Plans (ERPs) for all its operations. ERPs address the following scenarios as a minimum:

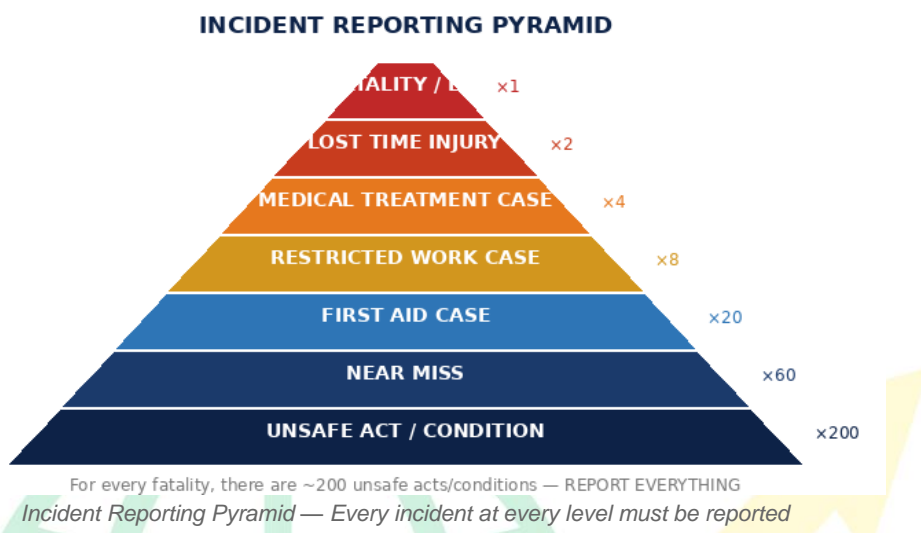
Marine Emergency Scenarios	Onshore / General Emergencies
<ul style="list-style-type: none"> <li>• Man Overboard (MOB)</li> <li>• Vessel collision or grounding</li> <li>• Fire aboard vessel or barge</li> <li>• Flooding and vessel sinking</li> <li>• Diving emergency / decompression sickness</li> <li>• Oil / fuel spill at sea</li> <li>• Severe weather / storm response</li> </ul>	<ul style="list-style-type: none"> <li>• Serious injury / medical emergency</li> <li>• Structural collapse</li> <li>• Fire at onshore yard or office</li> <li>• Hazardous material release</li> <li>• Security threats / piracy</li> <li>• Pandemic / mass casualty event</li> <li>• Power / utility failure</li> </ul>

- Emergency drills to be conducted as required by flag state requirements and project-specific ERPs.
- Emergency contact lists and muster stations to be posted on all vessels and project sites.
- First aid equipment and trained first-aiders to be available on all worksites and vessels.



## 12.0 Incident Reporting & Investigation

The Company promotes a transparent incident reporting culture. All incidents, near misses, and unsafe conditions must be reported.



### 12.1 Incident Classification & Reporting Timelines

Classification	Initial Notification	Full Investigation Report
Fatality / Life-Altering Injury	Immediate (verbal) + 2 hours written	Within 10 calendar days
Lost Time Injury (LTI)	Within 4 hours	Within 7 calendar days
Medical Treatment Case (MTC)	Within 24 hours	Within 5 calendar days
Restricted Work Case (RWC)	Within 24 hours	Within 5 calendar days
First Aid Case (FAC)	Within 48 hours	Within 3 calendar days
Near Miss (High Potential)	Within 24 hours	Within 5 calendar days
Environmental Spill (Reportable)	Immediate + 2 hours written	Within 10 calendar days

### 12.2 Root Cause Analysis

- All LTIs, High-Potential Near Misses, and environmental incidents require formal Root Cause Analysis (RCA).
- RCA methodology to be applied (e.g. Bowtie, TapRoot, 5-Why analysis as appropriate).
- Corrective and Preventive Actions (CAPAs) to be tracked to closure with verified effectiveness.

## 13.0 Training & Competence

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All personnel must demonstrate competence before undertaking safety-critical tasks. The Company maintains a Training Matrix aligned to all job roles.

- HSE Induction: mandatory for all personnel before site mobilisation (minimum 4 hours).
- Marine Safety Induction: mandatory for all personnel embarking on Company vessels.
- Mandatory certificates: BOSIET/FOET (offshore workers), STCW (vessel crew), Diving Medical (divers).
- Toolbox Talks: minimum daily frequency for marine construction activities.
- First Aid at Work: minimum 1 trained first aider per 10 workers on site and per vessel.
- Emergency Response Team (ERT) training: annual for all designated ERT members.
- HSE Manager and Site HSE Officers: NEBOSH/IOSH or equivalent qualification required.
- Training records maintained in the Company HR / HSE Management System and available for audit.

## 14.0 Monitoring, Audit & Review

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- Weekly HSE inspections on all active project sites and vessels by Project HSE Officers.
- Monthly HSE performance reports to be submitted by Project Managers to HSE Manager.
- Quarterly internal HSE audits against ISO 45001, ISO 14001, and ISM Code requirements.
- Annual third-party HSE audit by an approved independent certification body.
- Annual Management Review of HSE performance, objectives, policy adequacy, and system effectiveness.
- HSE leading and lagging indicators to be tracked and reported monthly to the Board.

## 15.0 Communication & Consultation

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- Monthly HSE Committee meetings chaired by the HSE Manager with worker representative participation.
- HSE performance data and statistics to be communicated to all staff via notice boards, email, and the Company intranet.
- HSE Alert bulletins to be issued within 48 hours of significant incidents for Company-wide lessons-learned sharing.
- Workers are entitled to refuse unsafe work, and report concerns without fear of reprisal.
- Anonymous HSE reporting channels to be available to all personnel.

## 16.0 Contractor & Supplier Management

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- All contractors and subcontractors must meet the Company's minimum HSE qualification requirements before engagement.
- Contractor HSE prequalification to include review of HSE policy, statistics, procedures, and past performance.
- Contractors are required to comply with this policy and all project-specific HSE requirements as a contractual obligation.
- Company HSE Officers have the authority to stop contractor work for unsafe practices.
- Contractor HSE performance to be monitored, evaluated, and recorded throughout the project lifecycle.

## 17.0 Document Control

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- This policy document is version-controlled and maintained by the HSE Manager.
- The HSE Manager is responsible for reviewing this policy at least once every 12 months or following significant organisational, operational, or regulatory changes.
- Controlled copies are distributed to all Department Heads and Project Managers.
- Obsolete versions are to be archived and removed from active use immediately upon issue of a new revision.
- This policy is available on the Company intranet for access by all employees.



## 18.0 Authorisation & Sign-Off

This Health, Safety & Environment Policy has been reviewed and approved by the undersigned senior management of Atlas International Transport & General Contracting LLC. It is effective from the date of signature below.

Prepared By	Reviewed By	Approved By
<b>Name:</b> _____	<b>Name:</b> _____	<b>Name:</b> _____
Title: Operation Manager	Title: Operation Manager	Title: Chief Executive Officer
<b>Signature:</b> _____	<b>Signature:</b> _____	<b>Signature:</b> _____
Date: ____ / ____ / ____	Date: ____ / ____ / ____	Date: ____ / ____ / ____



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