

OCCUPATIONAL HEALTH & SAFETY MANAGEMENT PLAN

Policy, Procedures & Safe Work Practices

ISO 45001:2018 Equivalent Framework

LINDIZWE SCRAP METALS

80 Radio Road, Alberton North, Gauteng, South Africa

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CONFIDENTIAL — CONTROLLED DOCUMENT

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1. INTRODUCTION & ORGANISATION PROFILE

1.1 Purpose

This Occupational Health and Safety Management Plan (OHSMP) establishes the health and safety management framework for Lindizwe Scrap Metals ("the Company"). It is structured to be equivalent to the requirements of ISO 45001:2018 — the international standard for Occupational Health and Safety Management Systems — and is designed to comply fully with the South African Occupational Health and Safety Act 85 of 1993 (OHS Act) and its regulations.

This document provides a systematic approach to identifying hazards, assessing and controlling risks, preventing injury and occupational illness, and continually improving OHS performance across all site operations at 80 Radio Road, Alberton North.

1.2 Organisation Details

Field	Detail
Company Name	Lindizwe Scrap Metals
Physical Address	80 Radio Road, Alberton North, Gauteng, South Africa
Industry Sector	Scrap Metal Collection, Processing & Recycling
Business Activity	Purchase, sorting, processing, storage and sale of ferrous and non-ferrous scrap metal
OHSMP Reference	LSM-OHS-001
Issue Date	April 2026
Next Review	April 2027
OHS Representative	To be appointed — see Section 5

1.3 Scope

This OHSMP applies to all activities conducted on the site at 80 Radio Road, Alberton North, and covers:

- All permanent, part-time, and casual employees of Lindizwe Scrap Metals
- Contractors, visitors, and members of the public accessing the site
- All operations including intake, sorting, processing, storage, dispatch, and maintenance
- All plant, equipment, machinery, vehicles, and substances used on-site

2. OHS POLICY STATEMENT

LINDIZWE SCRAP METALS — OCCUPATIONAL HEALTH & SAFETY POLICY

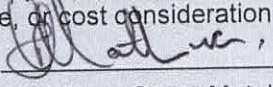
Lindizwe Scrap Metals is unconditionally committed to providing a safe and healthy working environment for all employees, contractors, and visitors. We believe that all work-related injuries, occupational illnesses, and unsafe incidents are preventable.

We recognise that the scrap metal processing industry carries inherent hazards — including manual handling risks, machinery and cutting equipment, hazardous substances, and vehicle movement — and we commit to managing these hazards systematically and proactively.

Lindizwe Scrap Metals commits to:

- Complying with the Occupational Health and Safety Act 85 of 1993 and all applicable regulations, without exception
- Identifying all workplace hazards and implementing effective risk controls in accordance with the hierarchy of controls
- Consulting with workers on OHS matters and encouraging active participation in maintaining a safe workplace
- Providing adequate information, instruction, training, and supervision to ensure employees can perform their work safely
- Providing and maintaining a safe plant, safe equipment, and safe systems of work
- Ensuring that all substances are safely used, handled, stored, and transported
- Setting measurable OHS objectives and targets and reviewing performance annually
- Investigating all incidents and near-misses to identify root causes and prevent recurrence
- Continuously improving this OHS Management Plan and our overall OHS performance

This policy is personally endorsed by the Director and is non-negotiable. No production target, deadline, or cost consideration will be allowed to compromise the health and safety of our people.

Signed:  Date: 29 JUNE 2026
Director, Lindizwe Scrap Metals



3. LEGISLATIVE & REGULATORY FRAMEWORK

3.1 Primary Legislation

All operations of Lindizwe Scrap Metals are conducted in compliance with the following legislation and regulations. This register is reviewed annually (see Section 14).

Legislation / Regulation	Key Requirement	Applicability to LSM
OHS Act 85 of 1993	Employer duty of care; safe plant, systems, and environment; incident reporting	All operations — primary framework
General Safety Regulations (R.1031)	General workplace safety requirements; housekeeping; PPE	All areas and activities
Driven Machinery Regulations	Safe use of powered machinery; guarding; maintenance	Shears, balers, cranes, forklifts
General Machinery Regulations	Inspection and maintenance of mechanical equipment	All powered equipment
Electrical Installation Regulations	Safe electrical installations; competent persons	All electrical infrastructure
Facilities Regulations	Welfare facilities — toilets, washing, first aid	Site welfare facilities
Hazardous Chemical Substances Regulations (HCS Regs)	Identification, assessment, and control of HCS exposure	Cutting fumes, oils, acids, solvents
Environmental Regulations for Workplaces	Lighting, ventilation, temperature, noise	Processing and storage areas
Construction Regulations 2014	Safe construction and maintenance work on-site	Contractors performing civil/structural work
Lifting Machine Regulations	Safe use and inspection of cranes and lifting equipment	Overhead crane; forklift; chain blocks
Major Hazard Installation Regulations	Threshold quantities of hazardous substances	Review if bulk fuel/chemical storage exceeds thresholds
Compensation for Occupational Injuries and Diseases Act (COIDA) 130 of 1993	Workers compensation; injury reporting to DoEL within 7 days	All employees
Mine Health and Safety Act 29 of 1996	May apply to specific processing activities — review with DoEL	Confirm applicability with Department

4. CONTEXT OF THE ORGANISATION (ISO 45001 Clause 4)

4.1 Internal and External Issues Affecting OHS

4.1.1 External Issues

- Regulatory environment — active enforcement by the Department of Employment and Labour (DoEL) inspections
- Proximity to residential areas — noise, dust, and vehicle movement affecting community health
- Weather conditions — heat stress risk in summer; wet surfaces increasing slip/fall risk
- Supply chain variability — different types and conditions of incoming scrap introduce variable hazards
- Contractor and labour supply — varying competency levels of contractors and casual workers

4.1.2 Internal Issues

- Diverse hazard profile — manual handling, machinery, cutting, vehicle movement, chemical exposure, working at heights
- Workforce composition — varying literacy and language levels affecting training effectiveness
- Equipment condition — ageing plant introduces elevated mechanical failure risk
- Site layout — coexistence of pedestrians and vehicles in the same yard
- Housekeeping standards — metal offcuts, spills, and uneven surfaces create trip and slip hazards

4.2 Workers and Other Interested Parties

Interested Party	OHS Needs & Expectations
All Employees	Safe workplace; adequate PPE; proper training; right to refuse dangerous work
Contractors	Site induction; clear OHS rules; access to emergency facilities
Visitors & public	Safe access routes; supervision; visitor PPE where required
Department of Employment & Labour	Full compliance with OHS Act and regulations
Compensation Fund (COIDA)	Accurate incident reporting within prescribed timeframes
Workers' families	Confidence that loved ones will return home safe and healthy
Medical / Emergency services	Known site hazards; accessible emergency points; chemical register

5. LEADERSHIP, PARTICIPATION & CONSULTATION (ISO 45001 Clause 5)

5.1 OHS Roles and Responsibilities

Role	OHS Responsibilities	Accountable For
Director / Employer	Appoint Section 16(2) nominee; allocate OHS resources; approve policy; review OHS performance annually; ensure legal compliance	Ultimate OHS accountability under OHS Act
Section 16(2) Nominee / OHS Manager	Day-to-day OHS management; maintain OHS files; liaise with DoEL; manage contractor OHS; co-ordinate training	OHS system implementation
OHS Representative (elected)	Conduct monthly workplace inspections; investigate incidents; represent workers on OHS matters; attend OHS committee	Worker health and safety representation
Yard Supervisor / Foreman	Enforce safe work procedures; ensure PPE worn; stop unsafe work; conduct pre-shift safety checks; supervise visitors	Day-to-day operational safety
All Employees	Follow safe work procedures; wear PPE; report hazards and incidents; attend training; do not endanger others	Personal safety and safety of others
Maintenance Technician	Ensure equipment is maintained and guarded; apply lockout/tag out; manage electrical safety	Plant and equipment safety
First Aider (designated)	Provide first aid; maintain first aid kit; record first aid treatment in register	Immediate injury response

5.2 Statutory Appointments Required

The following appointments are legally required under the OHS Act and must be documented, signed, and filed:

Appointment	Legal Basis
Section 16(1) — Employer Accountability	OHS Act Section 16(1) — Director automatically accountable
Section 16(2) Nominee	OHS Act Section 16(2) — written appointment to assist with OHS duties
OHS Representative(s)	OHS Act Section 17 — 1 rep per 20 workers; elected by workers
OHS Committee (if 20+ employees)	OHS Act Section 19 — at least one management member + elected reps
First Aider(s)	First Aid Regulations — 1 per 50 workers on each shift; valid certificate
Incident Investigator	OHS Act Section 24 — appointed person to investigate incidents
Stacking Supervisor	General Safety Regs — supervision of all stacking activities
Lifting Machine Inspector	Lifting Machine Regs — competent person for all lifting inspections
Risk Assessor	OHS Act and relevant regulations — conduct and document risk assessments

5.3 Worker Participation and Consultation

Worker participation is a cornerstone of ISO 45001 and the OHS Act. The Company commits to:

- Consulting with workers before implementing any change that may affect their health and safety
- Including worker representatives in OHS Committee meetings (held quarterly minimum)
- Providing workers with access to OHS policies, procedures, risk assessments, and investigation reports
- Encouraging hazard reporting without fear of victimisation — a Hazard Report Form is available to all workers
- Workers have the right to refuse dangerous work — no disciplinary action shall be taken for good-faith refusal

6. PLANNING — HAZARD IDENTIFICATION & RISK ASSESSMENT (ISO 45001 Clause 6)

6.1 Hazard Identification Methodology

Lindizwe Scrap Metals identifies hazards through the following methods:

- Baseline Risk Assessment (BRA) — comprehensive assessment of all tasks and work areas (see Section 15)
- Issue-Based Risk Assessment (IBRA) — triggered by new activities, equipment changes, incidents, or regulatory changes
- Pre-task (Dynamic) Risk Assessment — daily pre-shift hazard identification by supervisors and workers
- Monthly OHS Inspections — systematic inspection using the approved checklist (OHS-FORM-001)
- Incident and near-miss investigation findings
- Worker hazard reports

6.2 Risk Assessment Methodology

Risk is evaluated using a 5x5 Likelihood x Severity matrix. Each identified hazard is scored, and controls are applied according to the hierarchy of controls until residual risk is acceptable (Low or Medium).

Likelihood \ Severity	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic
5 Almost Certain	5 LOW	10 MED	15 HIGH	20 CRITICAL	25 CRITICAL
4 Likely	4 LOW	8 MED	12 HIGH	16 CRITICAL	20 CRITICAL
3 Possible	3 LOW	6 MED	9 MED	12 HIGH	15 HIGH
2 Unlikely	2 LOW	4 LOW	6 MED	8 MED	10 MED
1 Rare	1 LOW	2 LOW	3 LOW	4 LOW	5 LOW

6.3 Hierarchy of Controls

Controls are applied in the following order of preference (most to least effective):

Control Level	Description & Examples
1. ELIMINATION	Remove the hazard entirely — e.g., discontinue use of a hazardous substance; redesign process to remove manual handling
2. SUBSTITUTION	Replace with something less hazardous — e.g., replace solvent-based degreaser with water-based product
3. ENGINEERING CONTROLS	Physical barriers between worker and hazard — e.g., machine guarding, extraction ventilation, bunding, interlocks
4. ADMINISTRATIVE CONTROLS	Safe work procedures, training, signage, job rotation, permit systems — e.g., lockout/tag out, hot work permits
5. PPE (LAST RESORT)	Personal protective equipment — e.g., hard hat, steel-toed boots, cut-resistant gloves, respiratory protection

6.4 OHS Objectives & Targets

Annual OHS objectives are set and monitored. Refer to Section 13 for the full register. Key objectives include:

- Zero fatalities and zero Lost Time Injuries (LTIs) per year
- First Aid Injury (FAI) rate reduction of 20% year-on-year
- 100% of risk assessments reviewed and updated annually
- 100% of legally required statutory appointments documented and current
- Monthly OHS inspections completed with findings closed out within agreed timeframes
- 100% of employees to complete annual OHS training

7. SUPPORT & COMPETENCE (ISO 45001 Clause 7)

7.1 OHS Training Programme

Training Topic	Target Audience	Frequency / Trigger
OHS Induction — Site Rules & Hazards	All new workers and contractors	On first day; before any work commences
Hazard Identification & Risk Assessment	...	Annually; on process change
Safe Work Procedures — task specific	Workers performing relevant tasks	On appointment; on procedure change; annually
PPE Selection, Use & Care	All workers	On appointment; when PPE changes; annually
First Aid (Level 1 FAASA certificate)	All designated first aiders	Every 3 years (re-certification)
Fire Prevention & Extinguisher Use	All workers	Annually; on change of fire equipment
Emergency Evacuation Drill	All workers	Bi-annually (minimum)
Forklift / Crane Operator Training	Designated operators only	On appointment; certificate renewal as required
Lockout/Tag out (LOTO) Procedure	Maintenance; supervisors	On appointment; annually

Hazardous Chemical Substances (HCS)	Workers handling HCS	Before initial exposure; annually
Incident Reporting & Investigation	Supervisors; OHS Rep; management	Annually
OHS Act — Worker Rights & Responsibilities	All workers	Annual refresher; rights card issued

7.2 PPE Requirements by Task

Work Activity	Minimum PPE Required	Additional PPE Where Required
All yard activities (general)	Safety boots (steel toecap), hard hat, high-visibility vest	Sunscreen; hearing protection in noisy zones
Manual handling of scrap metal	Cut-resistant gloves (EN388 Level D+), safety boots, hard hat, Hi-Vis	Eye protection if edges present
Torch cutting / grinding / welding	Welding shield/face shield, cut-resistant gloves, leather apron, respiratory protection (P100 + OV/P), hearing protection, spats	Fire-resistant overalls; welding boots
Battery handling (lead-acid)	Chemical-resistant gloves, face shield, rubber apron, eye wash nearby	Acid-resistant boots if risk of acid splash
Forklift / crane operation	Hard hat, Hi-Vis, safety boots, seat belt	Hearing protection in forklift operating areas
Chemical handling (oils, solvents)	Chemical-resistant gloves, safety glasses/goggles, steel-toed boots	Respirator if vapours exceed OEL
Maintenance and electrical work	Insulated gloves, safety glasses, hard hat, LOTO lock and tag	Arc flash PPE if live electrical work (permit required)
Visitors to site	Hard hat, Hi-Vis vest, safety boots or overshoes	Supervised at all times; no entry to processing areas

7.3 Communication

- OHS information is communicated via toolbox talks (minimum weekly), safety notice boards, and induction
- Safety signage shall be posted in all work areas in accordance with SANS 11684 (ISO 7010 equivalent)
- OHS Committee meeting minutes shall be posted on the notice board within 5 working days of the meeting
- Workers are encouraged to report hazards using Hazard Report Forms available at the supervisor's office

8. OPERATIONAL CONTROLS & SAFE WORK PROCEDURES (ISO 45001 Clause 8)

8.1 General Site Safety Rules

The following rules apply at all times to all persons on-site:

1. No person shall work on-site without completing the site OHS induction
2. All required PPE must be worn at all times in designated areas — no exceptions
3. No person shall operate plant or equipment without authorisation and demonstrated competency
4. Alcohol and drugs are absolutely prohibited on-site — zero tolerance policy applies
5. No smoking except in designated smoking areas, which shall be away from flammable materials
6. All injuries, near-misses, and unsafe conditions must be reported immediately to the supervisor
7. No horseplay, fighting, or dangerous conduct on-site
8. Pedestrians must use designated walkways; no shortcuts through vehicle operating areas
9. Housekeeping is everyone's responsibility — clean as you go; remove tripping hazards immediately

8.2 Vehicle and Pedestrian Traffic Management

- A site Traffic Management Plan (OHS-DOC-007) shall be maintained and reviewed annually
- Dedicated pedestrian walkways shall be clearly marked with painted lines and signage
- Maximum vehicle speed on-site is 10 km/h — signage to be posted at all entry points
- A banksman/spotter shall be used when reversing large vehicles in areas where pedestrians may be present
- Forklift operators must sound horn at all blind corners and intersections
- No pedestrian shall walk behind a reversing vehicle
- All vehicle operators must be in possession of a valid licence appropriate to the vehicle operated
- Forklifts shall be inspected daily using the pre-operation checklist (OHS-FORM-004) before use

8.3 Machine Guarding & Mechanical Safety

- All machines shall have fixed guards on all rotating, reciprocating, and shearing parts before operation
- Guards shall not be removed for any reason while machinery is in operation
- Maintenance work on machinery must follow the Lockout/Tag out procedure (OHS-SWP-003)
- A Machinery Register shall list all plant/equipment with service dates and inspection records
- No person under 18 years of age shall operate any powered machinery
- All overhead crane operations require a current inspection certificate and trained operator



8.4 Torch Cutting & Hot Work Procedure

Torch cutting is one of the highest-risk activities on-site. The following controls are mandatory:

10. A Hot Work Permit (OHS-FORM-005) must be issued by the supervisor before any torch-cutting begins
11. The work area must be cleared of all flammable materials within a 5-metre radius before cutting
12. A fire extinguisher (CO2 or dry powder) must be immediately available at the cutting location
13. A designated fire watch must remain at the cutting area for 30 minutes after cutting is complete
14. Gas cylinders must be properly secured upright, stored in a ventilated cage, and never stored in enclosed spaces
15. Oxygen and acetylene/LPG cylinders must be stored a minimum of 3 metres apart
16. All hoses and connections shall be inspected before use — damaged hoses must be replaced immediately
17. Cutting shall not take place on materials known or suspected to contain residual fuel, gases, or pressurised contents

8.5 Manual Handling & Ergonomics

- Workers shall be trained in safe manual handling techniques as part of OHS induction
- Maximum individual manual lift is 25 kg without mechanical assistance
- Team lifts (2 persons) for loads between 25–50 kg
- Mechanical lifting aids (forklifts, chain blocks, crane) must be used for loads exceeding 50 kg
- Cut-resistant gloves must be worn when handling all scrap metal by hand
- Anti-fatigue matting shall be provided at workstations where prolonged standing is required

8.6 Electrical Safety

- All electrical work must be performed by a registered electrician (Certificate of Compliance required for new installations)
- Lockout/Tag out (LOTO) procedure (OHS-SWP-003) must be applied before any maintenance on electrical equipment
- Extension cords must be approved for industrial use; no domestic extension cords in the workplace
- All portable electrical equipment shall be included in the Portable Electrical Equipment register and inspected every 3 months
- Electrical panels and distribution boards must be accessible and must not be used as storage
- Any electrical fault, spark, shock, or trip must be reported immediately and investigated

8.7 Hazardous Chemical Substances (HCS)

- A Chemical Register listing all hazardous substances present on-site shall be maintained (OHS-DOC-005)
- Current Safety Data Sheets (SDS) must be accessible for all HCS at all times
- Workers must be trained on HCS hazards, SDS interpretation, and correct PPE before handling any HCS
- HCS shall be stored according to their SDS requirements and in accordance with SANS 10234/GHS labelling
- Occupational Exposure Levels (OELs) shall be considered when evaluating chemical risks; biological monitoring may be required for lead, chromium, and other heavy metal exposures
- Exposure to welding and cutting fumes must be controlled below the relevant OEL through ventilation and respiratory protection

8.8 Working at Heights

- Any work at height above 1.5 metres from the ground requires a Working at Heights Permit (OHS-FORM-006)
- Scaffolding must be erected and inspected by a competent person; inspection certificate required
- Portable ladders must be inspected before use and secured at top and/or bottom to prevent movement
- Full-body harness and lanyard must be worn where fall risk cannot be eliminated by other means
- No person shall work at heights alone — a standby person must be present

8.9 Noise Management

- Noise surveys shall be conducted annually to identify high noise areas (>85 dBA)
- Areas exceeding 85 dBA shall be demarcated as Hearing Protection Zones with mandatory signage
- Hearing protection (minimum SNR 27 dB muffs or earplugs) must be worn in all Hearing Protection Zones
- Workers with regular exposure to noise above 85 dBA shall be enrolled in the annual audiometric testing programme
- Engineering controls (enclosures, silencers, anti-vibration mounts) shall be considered to reduce noise at source

8.10 Housekeeping Standards

- All work areas shall be swept and cleared of metal offcuts, fines, and debris at the end of each shift
- Walkways and emergency exits shall be kept clear at all times — no temporary storage
- Spills of oil, fuel, or chemicals shall be cleaned up immediately using appropriate absorbent materials
- Adequate lighting shall be maintained in all work areas (minimum 200 lux for general work; 500 lux for detailed work)
- Waste and scrap storage shall be organised to prevent collapse and facilitate safe movement



8.11 Contractor Management

Contractors performing work on-site present a significant OHS risk. The following controls apply:

18. All contractors must provide proof of their own OHS policy, risk assessments, and relevant competencies before commencing work
19. All contractors must attend the site OHS induction before starting any work on-site
20. A contractor OHS file must be maintained for every contractor containing their documentation
21. The Site OHS Manager must approve all contractor risk assessments and method statements before work begins
22. Contractors are subject to all site OHS rules; they may be removed from site for non-compliance
23. The site shall retain liability for contractor OHS where the contractor is working under the direction of site management (as per OHS Act Section 37(2) agreement)

9. EMERGENCY PREPAREDNESS & RESPONSE (ISO 45001 Clause 8.2)

9.1 Identified Emergency Scenarios

Emergency	Immediate Response Action
Serious injury / collapse	Call 10177/112; do not move victim unless secondary danger; first aider to respond; contact DoEL if serious injury
Fire	Activate fire alarm; evacuate to assembly point; contact 10111 / 112; attack with extinguisher only if safe to do so
Gas cylinder fire or explosion risk	EVACUATE immediately; call 10111; do not approach; isolate area; notify fire brigade of gas cylinder location
Chemical spill (HCS)	Evacuate immediate area; ventilate; deploy spill kit (if safe); prevent entry to drains; refer to SDS; notify supervisor
Electrical shock	Do NOT touch victim while source is live; isolate power; call 10177; trained first aider to assist
Vehicle accident on-site	Stop all other vehicle movement; secure scene; call 10177; secure CCTV footage; notify OHS Manager
Worker missing / entrapment	Alert supervisor immediately; do not operate machinery until location confirmed; call 10111 if not found
Violent incident / armed robbery	Do not resist; call 10111 after threat has passed; trauma support for affected workers

9.2 Fire Prevention & Firefighting

- Fire risk assessment to be conducted and reviewed annually
- Fire extinguishers must be inspected monthly (by responsible person) and annually (by accredited service agent)
- Fire extinguisher types on-site: CO2 (electrical areas), dry powder (general), foam (fuel stores)
- Fire assembly point(s) to be clearly marked; all workers to know the assembly point location
- Emergency evacuation drills to be conducted bi-annually; results documented and reviewed
- Flammable and combustible materials to be stored in designated, clearly marked areas away from ignition sources

9.3 First Aid

- At least one trained first aider (valid FAASA Level 1 certificate) must be present during all working hours
- First aid kit(s) must comply with First Aid Regulations; contents checked monthly and replenished as used
- First Aid Register to record every treatment given (OHS-FORM-007)
- Location of first aid kit and emergency contact numbers to be posted on all notice boards

9.4 Emergency Contact Numbers

Contact	Number
National Emergency / Ambulance	10177 / 112
South African Police Service (SAPS)	10111
Ekurhuleni Fire & Rescue Services	011 458 0911
Netcare 911	082 911
ER24	084 124
DoEL – Ekurhuleni Labour Centre	011 748 0800
Nearest hospital (Alberton area)	To be inserted by site
OHS Manager (emergency)	To be inserted by site
Director (after hours)	To be inserted by site



10. PERFORMANCE EVALUATION — MONITORING & INSPECTION (ISO 45001 Clause 9)

10.1 OHS Monitoring Programme

Parameter	Method	Frequency
Workplace inspections	Formal inspection using OHS-FORM-001; all areas covered	Monthly by OHS Rep
Noise levels	Sound level meter survey; compare to 85 dBA OEL	Annually; after equipment changes
Airborne dust & fumes	Personal air monitoring; compare to OELs in HCS Regs	Annually or after process change
Audiometric testing	Baseline and periodic testing for noise-exposed workers	Annual for all noise-exposed workers
Forklift/crane inspections	Pre-operation checklist (OHS-FORM-004) + annual inspection by competent person	Daily + Annual
First aid kit contents	Physical check against required contents list	Monthly
Fire extinguisher condition	Physical inspection; pressure gauge; pin and seal	Monthly + Annual service
PPE condition audit	Supervisor check; replacement of defective PPE	Monthly; after each use if damaged
Statutory appointment validity	Review all appointment letters and certificates	Annually
Training records	Review training register completeness	Quarterly
Legal compliance	Legal register review against current OHS legislation	Annually
Incident rate statistics	Calculate LTIFR, FIFR, and severity rate	Monthly trending; annual review

10.2 Key OHS Performance Indicators

KPI	Formula / Measure
Lost Time Injury Frequency Rate (LTIFR)	$(\text{Number of LTIs} \times 1,000,000) / \text{Total hours worked}$
Fatal Injury Frequency Rate (FIFR)	$(\text{Number of fatalities} \times 1,000,000) / \text{Total hours worked}$
Disabling Injury Severity Rate (DISR)	$(\text{Total days lost} \times 1,000,000) / \text{Total hours worked}$
First Aid Injury Rate	Total first aid cases per month; track trend
Near-miss Reporting Rate	Number of near-misses reported per month; benchmark vs incidents
Training Completion Rate	% of planned training completed on schedule
Inspection Compliance Rate	% of monthly inspections completed with findings closed within agreed timeframe
Statutory Compliance	% of required appointments, certificates, and registers in place and current

10.3 Internal OHS Audits

A formal internal OHS audit shall be conducted annually by the OHS Manager or a competent person. The audit shall assess compliance with:

- This OHSMP
- Applicable OHS Act regulations
- ISO 45001:2018 requirements

Audit findings shall be categorised as Major Non-Conformance, Minor Non-Conformance, or Observation, and corrective actions assigned with deadlines.

10.4 Management Review

The Director shall conduct an annual OHS Management Review. Inputs include OHS statistics, audit results, legal compliance status, training records, incident trends, and resource requirements. Outputs include decisions on objectives, resources, and any required changes to this OHSMP.

11. INCIDENT INVESTIGATION & REPORTING

11.1 Definitions

Term	Definition
Accident	An unplanned event resulting in injury, illness, or damage to property
Incident	Any unplanned event that did or could have resulted in injury, illness, or damage (includes near-misses)
Near-miss	An incident where no injury or damage occurred but could have under slightly different circumstances
Lost Time Injury (LTI)	An injury that results in the worker being unable to return to their normal duties on the following shift
First Aid Injury (FAI)	An injury that requires only first aid treatment and allows the worker to return to normal duties
Occupational Disease	A disease contracted as a result of exposure to hazardous conditions in the workplace

11.2 Incident Reporting Requirements

Incident Type	Reporting Requirement
All injuries (any severity)	Report to supervisor immediately; First Aid Register entry; Incident Register entry within 24 hours
First Aid Injury (FAI)	Supervisor report to OHS Manager within 24 hours; FAI form completed (OHS-FORM-008)
Medical Treatment Injury (MTI) / LTI	OHS-FORM-008 completed; notify DoEL within 7 days (W.Cl.2 form via COIDA)
Fatality or serious bodily harm	Notify DoEL immediately (DoEL Alberton: 011 748 0800); preserve scene; conduct formal investigation
Near-miss	Report to supervisor on same day; formal investigation if High/Critical risk potential
Dangerous occurrence (explosion, structural collapse, etc.)	Notify DoEL immediately; preserve scene; formal investigation required

11.3 Incident Investigation Procedure

24. IMMEDIATE RESPONSE — ensure scene is safe; provide first aid; preserve evidence
25. NOTIFY — inform OHS Manager and Director immediately; notify DoEL if required
26. INVESTIGATE — appointed incident investigator to conduct investigation within 48 hours of incident
27. ROOT CAUSE ANALYSIS — apply 5-Whys or Fault Tree Analysis to identify root causes
28. CORRECTIVE ACTIONS — identify actions to prevent recurrence; assign responsible person and deadline
29. REPORT — complete the Incident Investigation Report (OHS-FORM-009); submit to Director and OHS Committee
30. CLOSE OUT — verify effectiveness of corrective actions; close NCR in register
31. SHARE LEARNINGS — communicate lessons learned to all workers via toolbox talk

12. IMPROVEMENT & CORRECTIVE ACTION (ISO 45001 Clause 10)

12.1 Non-Conformance & Corrective Action

Any non-conformance with this OHSMP, an OHS regulation, or an approved safe work procedure shall be managed as follows:

32. Identify and record the non-conformance in the NCR Register (OHS-FORM-010)
33. Implement immediate corrective measures to prevent injury
34. Conduct root cause analysis
35. Develop corrective action plan with owner and deadline
36. Implement and verify effectiveness of corrective actions
37. Close out NCR; communicate outcome to relevant parties

12.2 Continual Improvement

The Company actively seeks opportunities to improve OHS performance through:

- Analysis of incident and near-miss trends
- Worker suggestions and hazard reports
- OHS inspection and audit findings
- Management review outputs
- Monitoring of industry best practice and new OHS technologies
- Changes in applicable legislation or new guidance from the DoEL

13. OHS OBJECTIVES & TARGETS REGISTER

The following objectives and targets apply for the current review period (April 2026 – March 2027):

Objective	Target	KPI / Measure	Responsible	Review Date
Zero fatalities	0 fatalities	Incident Register	Director	Ongoing
Zero LTIs	0 lost-time injuries	LTIFR = 0	OHS Manager	Mar 2027
Reduce FAI rate	20% reduction vs prior year	Monthly FAI count	OHS Manager	Mar 2027
100% statutory appointments	All appointments signed & current	Appointments file review	OHS Manager	Apr 2026
Training completion	100% of staff trained	Training Register	OHS Manager	Dec 2026
Monthly inspections	12 inspections documented	Inspection records on file	OHS Rep	Monthly
Risk assessments current	All RAs reviewed annually	RA register dates	OHS Manager	Mar 2027
Near-miss reporting	Min. 2 near-misses reported per month	Near-miss register	All supervisors	Monthly
Legal compliance	Full compliance — zero DoEL notices	Annual legal review; inspection records	Director	Mar 2027

14. LEGAL REGISTER SUMMARY

The full OHS Legal Register (OHS-DOC-006) is maintained separately and reviewed annually. A summary of key obligations is provided below:

Legislation	Key Obligation	Status
OHS Act 85 of 1993 — Section 8	Employer duty to ensure safe environment; Section 16 appointment	Comply — immediate
OHS Act — Section 24	Incident reporting to DoEL — serious injuries within 7 days	Comply — ongoing
General Safety Regulations	PPE; housekeeping; stacking; safety signs	Comply — ongoing
Driven Machinery Regulations	Machine guarding; competent operators; maintenance records	Comply — ongoing
Lifting Machine Regulations	Annual inspection of all lifting equipment by approved inspection authority	Arrange — annual
HCS Regulations	Chemical register; SDS; OEL monitoring; medical surveillance if required	Comply — ongoing
Environmental Regs for Workplaces	Lighting, ventilation, noise, sanitation	Comply — ongoing
COIDA 130 of 1993	Register with Compensation Fund; submit annual returns; report injuries	Comply — annual returns
Facilities Regulations	Adequate sanitation, wash facilities, change rooms, eating area	Comply — review facilities



15. OHS RISK REGISTER

This is a summary Baseline Risk Register. A full working risk register (OHS-DOC-003) is maintained separately. Residual risk ratings below assume all controls are in place and effective.

Activity / Area	Hazard	Potential Harm	Controls Required	Residual Risk	Risk Owner
Metal intake / receiving	Sharp edges; falling objects	Lacerations; crush injury	Cut-resistant gloves; hard hat; safety boots; organised intake area	MEDIUM	Yard Sup.
Manual handling of scrap	Overexertion; sharp edges; dropped loads	Musculoskeletal injury; cuts; crush	Training; max 25kg rule; mechanical aids; cut-resistant gloves	LOW	Yard Sup.
Torch cutting / hot work	Burns; fire; explosion; fumes	Burns; respiratory disease; fire	Hot work permit; fire watch; PPE; ventilation; gas cylinder safety	MEDIUM	OHS Mgr
Grinding / angle grinder use	Disc failure; sparks; noise	Eye/face injury; lacerations; NIHL	Face shield; guard; hearing protection; anti-vibration gloves	MEDIUM	Supervisor
Forklift operations	Collision; tip-over; falling loads	Crush; fatal injury	Traffic management; trained operator; daily inspection; speed limit	MEDIUM	OHS Mgr
Battery handling (lead-acid)	Acid burns; toxic lead exposure	Chemical burns; lead poisoning	Chemical gloves; face shield; bunted store; LOTO; hygiene training	LOW	OHS Mgr
Electrical equipment	Contact with live parts; faulty equipment	Electric shock; cardiac arrest	LOTO; licensed electrician; portable tool register; inspections	LOW	Maintenance
Vehicle movement in yard	Struck by vehicle; collision	Fatal/serious injury	Pedestrian walkways; 10km/h limit; Hi-Vis; banksman for reversing	MEDIUM	Yard Sup.
Noise from operations	Prolonged exposure to high dBA	Noise-induced hearing loss	Hearing zones marked; ear protection mandatory; audiometry	LOW	OHS Mgr
Chemical exposure (oils/fumes)	Inhalation; skin contact	Dermatitis; respiratory disease	SDS available; appropriate PPE; ventilation; OEL monitoring	LOW	OHS Mgr
Working at heights	Fall from height	Fatal/serious injury	Permit; harness; inspected ladder/scaffold; no solo work at height	LOW	Yard Sup.
Fire	Ignition of fuel/gas/scrap	Burns; fatalities; asset loss	Hot work permit; extinguishers; no smoking policy; fire drills	LOW	OHS Mgr
Heat stress (outdoor work)	High ambient temperature	Heat exhaustion; heat stroke	Water; shade; rest breaks; buddy system; acclimatisation	MEDIUM	Supervisor
Housekeeping deficiencies	Slip/trip hazards; poor lighting	Falls; injuries	Shift-end clean-up; clear walkways; adequate lighting (200+ lux)	LOW	All staff

16. DOCUMENT CONTROL & REVIEW

16.1 OHS Document Register

Document	Reference No.	Custodian
OHS Management Plan (this document)	LSM-OHS-001	Director / OHS Manager
OHS Policy (signed)	LSM-OHS-002	Director
OHS Risk Register (full)	OHS-DOC-003	OHS Manager
Statutory Appointments File	OHS-DOC-004	OHS Manager
Chemical / HCS Register & SDS File	OHS-DOC-005	OHS Manager
OHS Legal Register	OHS-DOC-006	OHS Manager
Traffic Management Plan	OHS-DOC-007	OHS Manager
Monthly Workplace Inspection Checklist	OHS-FORM-001	OHS Rep
Toolbox Talk Register	OHS-FORM-002	Supervisor
OHS Training Register	OHS-FORM-003	OHS Manager
Forklift / Crane Pre-operation Checklist	OHS-FORM-004	Operators / Supervisor
Hot Work Permit	OHS-FORM-005	Supervisor
Working at Heights Permit	OHS-FORM-006	Supervisor
First Aid Treatment Register	OHS-FORM-007	First Aider
Incident Report Form (FAI/MTI/LTI)	OHS-FORM-008	OHS Manager
Incident Investigation Report	OHS-FORM-009	OHS Manager
Non-Conformance & Corrective Action Register	OHS-FORM-010	OHS Manager
Hazard Report Form	OHS-FORM-011	All workers
OHS Committee Meeting Minutes	OHS-FORM-012	OHS Manager

16.2 Document Control Rules

- The current version of this OHSMP is the controlled version. Printed copies are uncontrolled unless stamped CONTROLLED COPY.
- Amendments require Director Approval and shall be recorded in the amendment log below.
- Superseded versions shall be archived and retained for a minimum of 5 years.
- This OHSMP shall be reviewed annually, or following any significant incident, regulatory change, or material change to operations.



16.3 Amendment Log

Version	Date	Amendment Description
1.0	April 2026	Initial issue of OHSMP for Lindizwe Scrap Metals

END OF DOCUMENT

Lindizwe Scrap Metals | 80 Radio Road, Alberton North | LSM-OHS-001 v1.0 | April 2026