



# **Environment, Health and Safety Management System Manual**

# **EH&S Organization Environment, Health and Safety Management System Standard**

## **4.1 General Requirements**

AT&T shall establish, document, implement, maintain and continually improve an Environment, Health and Safety (EHS) Management System and its subparts based on the principles of ISO 14001 and OHSAS 18001 and determine how it will fulfill the applicable requirements. AT&T shall define and document the scope of its EHS management system.

## **4.2 Environmental, Health and Safety Policy**

AT&T's senior leadership shall define, document and authorize its EHS policy and ensure that, within the defined scope of its EHS Management System, it:

- a. is appropriate to the nature, scale and EH&S impacts/ aspects/risks of AT&T's activities, products and services,
- b. includes a commitment to continual improvement in EH&S management and performance; and prevention of pollution, injury and ill health,
- c. includes a commitment to comply with applicable legal requirements and with other requirements to which AT&T subscribes, which relate to its EH&S impacts/aspects/risks,
- d. provides the framework for setting and reviewing EH&S objectives and targets,
- e. is documented, implemented and maintained,
- f. is communicated to all persons working for, under the control of, or on behalf of AT&T with the intent that they are made aware of their individual EH&S obligations,
- g. is available to the public and interested parties, and
- h. is reviewed periodically to ensure that it remains relevant and appropriate to AT&T.

## **4.3 PLANNING**

### **4.3.1 Environmental, Health and Safety Aspect/Hazard Identification, Risk Assessment and Determining Controls**

AT&T shall continually and proactively identify, document, establish, implement and maintain procedures for determining environment, health and safety:

- aspects/impacts,
- hazards,
- risks,
- controls,
- operational changes,

taking into account its current operations/activities, applicable legal obligations as well as the following:

- a. aspects/resources that it can control/influence,
- b. aspects that have or can have significant impact(s),
- c. planned or new developments,

- d. new or modified products and services,
- e. new, modified, routine and non-routine activities,
- f. activities of persons having access to the workplace (including contractors and visitors),
- g. changes or proposed changes in AT&T, its activities, materials, or modifications to management systems,
- h. human behavior, capabilities and other human factors,
- i. hazards originating outside the workplace capable of adversely affecting the health and safety of persons under the control of AT&T within the workplace,
- j. hazards created in the vicinity of the workplace by work-related activities under the control of AT&T,
- k. infrastructure, equipment and materials at the workplace, whether provided by AT&T or others,
- l. design of work area processes: installations, machinery/equipment, operating procedures and work organization, including their adaptation to human capabilities.
- m. Risks are to be prioritized, documented, and communicated before determining and implementing controls.

When determining controls or considering changes to existing controls, the following shall be considered:

- a. Elimination,
- b. Substitution,
- c. Engineering controls,
- d. Administrative controls,
- e. Personal protective equipment (PPE), and
- f. Others, as applicable.

AT&T shall document and keep the results of identified environment, health and safety aspects/ hazards, risks, risk assessments and ensure that controls are up to date. The results and control information shall be taken into account when establishing, implementing and maintaining AT&T's management systems.

#### **4.3.2 Legal and Other Requirements**

AT&T shall establish, document, implement and maintain a procedure(s):

- a. to identify and have access to applicable legal and other requirements to which AT&T subscribes related to its environment, health and safety aspects/ risks, and
- b. to determine how these requirements apply to its environment, health and safety aspects/risks.

AT&T shall ensure that applicable legal and other requirements to which AT&T subscribes are taken into account when establishing, implementing and maintaining its environment, health and safety management system.

AT&T shall document this information and keep it up to date.

AT&T shall communicate applicable legal and other requirements to persons working under the control of AT&T and other relevant interested parties.

#### **4.3.3 Objectives, Targets and Program(s)**

AT&T shall establish, implement and maintain documented environment, health and safety objectives and targets.

The objectives and targets shall be measurable, where practicable, and consistent with AT&T's environment, health and safety policy, including a commitment to continual improvement, prevention of pollution and compliance with applicable environment, health and safety requirements.

When establishing and reviewing environment, health and safety objectives and targets, AT&T shall take into account:

- a. legal and other requirements to which AT&T subscribes,
- b. significant environment, health and safety aspects/risks,
- c. technological options,
- d. financial, operational and business requirements, and
- e. the views of relevant interested parties
- f. AT&T shall establish, implement and maintain a system/program(s) for achieving objectives and targets. System/program(s) shall include at a minimum:
- g. designation of responsibility and authority for achieving objectives and targets at relevant functions and levels of AT&T, and
- h. the means and time-frame by which they are to be achieved.
- i. The system/program(s) shall be reviewed at regular and planned intervals and adjusted, as necessary, to ensure that objectives are achieved.

#### **4.4 IMPLEMENTATION AND OPERATION**

##### **4.4.1 Resources, Roles, Responsibility, Accountability and Authority**

AT&T's top management shall take ultimate responsibility for environment, health and safety and its environment, health and safety management system.

AT&T shall document/establish how to maintain resources essential to implement, maintain and improve its environment, health and safety management system.

These resources include:

- financial and human resources,
- specialized skills,
- organizational and physical infrastructure, and
- technology.

A member(s) of top management will be identified and communicated to all persons working under the control of AT&T. This person(s) will have specific responsibility for environment, health and safety with clear and defined roles and authority for:

- a. ensuring that an environment, health and safety management system is established, implemented and maintained in accordance with the requirements of this standard,
- b. defining roles, allocating responsibilities and accountabilities, and delegating authorities to facilitate an effective and efficient environment, health and safety management system. Roles, responsibilities, accountabilities, and authorities shall be documented and communicated,

- c. ensuring that reports on the performance of AT&T's environment, health and safety management system are presented to appropriate AT&T top management for review, including recommendations for improvement, and used as a basis for improvement of its environment, health and safety management system.

All those with environment, health and safety management responsibility shall demonstrate and document their commitment to the continual improvement of environment, health and safety performance.

AT&T shall require that all persons working under its control take responsibility for identified environment, health and safety aspects/risks in their workplace and adhere to AT&T's applicable environment, health and safety requirements.

#### **4.4.2 Competence, Training and Awareness**

AT&T shall require that any person(s) performing tasks on its behalf or under its control, demonstrate competence on the basis of appropriate environment, health and safety education, training or experience and retain associated records.

AT&T shall identify and document training needs associated with its environment, health and safety aspects/risks and environment, health and safety management system.

AT&T shall require that training or other action is taken to meet these needs, verify that required training or action has been taken, and retain associated records.

Training procedures shall take into account differing levels of:

- a. responsibility, ability, language skills and literacy, and
- b. risk

AT&T shall establish, document, implement and maintain program(s) to make persons working on its behalf or under its control aware of:

- a. the adverse environment, health and safety consequences, actual or potential, of work activities, behavior, and/or departure from AT&T's procedures,
- b. the benefits of improved environment, health and safety personal performance,
- c. roles and responsibilities and the importance of conformity with AT&T's environment, health and safety policy, procedures, and requirements of its environment, health and safety management system,
- d. the significant environment, health and safety aspects/risks and related actual or potential impacts associated with work.

#### **4.4.3 COMMUNICATION, PARTICIPATION AND CONSULTATION**

##### **4.4.3.1 Communication**

With regard to AT&T's environment, health and safety aspects/hazards and its environment, health and safety management system, AT&T shall establish, implement, and maintain a procedure(s) for:

- a. internal communication among the various levels and functions of AT&T,
- b. communication with contractors and other visitors to the workplace,
- c. receiving, documenting and responding to relevant communication from external interested parties.
- d. AT&T shall decide whether to communicate externally about its significant environment, health and safety aspects/hazards, and shall document its decision. If the decision is to communicate, AT&T shall establish and implement a method(s) for this external communication.

#### **4.4.3.2 Participation and Consultation**

AT&T shall establish, implement and maintain a procedure(s) for the participation of workers by their:

- a. involvement in:
  - o environment, health and safety aspect/hazard identification, risk assessments and determination of controls,
  - o incident investigation, and
  - o development and review of AT&T environment, health and safety policies and objectives
- b. consultation (including contractors, as applicable) where there are any changes that affect environment, health and safety and objectives,
- c. representation on environment, health and safety matters

AT&T shall require that, when appropriate, relevant external interested parties are consulted about pertinent environment, health and safety matters.

#### **4.4.4 Documentation**

AT&T's environment, health and safety management system documentation shall include documents, including records, determined by AT&T to be necessary to ensure the effectiveness, planning, operation and control of processes that relate to the management of significant environment, health and safety aspects/ risks.

#### **4.4.5 Control of Documents**

Documents required by AT&T's environment, health and safety management system shall be controlled.

Records are a special type of document and shall be controlled in accordance with the requirements given in Section 4.5.4

AT&T shall establish, document, implement and maintain a procedure(s) to:

- a. approve documents for adequacy prior to issue,
- b. review and update as necessary and reapprove documents,
- c. require that changes and the current revision status of documents are identified,
- d. require that relevant versions of applicable documents are available at points of use,
- e. require that documents remain legible and readily identifiable,
- f. require that documents of external origin determined by AT&T to be necessary for the planning and operation of its environment, health and safety management system are identified and their distribution controlled, and
- g. create controls intended to prevent the use of obsolete documents and apply suitable identification to them if they are retained for any purpose

#### **4.4.6 Operational Control**

AT&T shall plan, create, document and implement controls for those operations/activities that are associated with the identified significant environment, health and safety aspects/risks consistent with AT&T's environment, health and safety policy, objectives & targets and shall include management of change.

AT&T shall establish, implement and maintain:

- a. documented procedure(s) and stipulated operating criteria to control situations where their absence could lead to deviation from AT&T's environment, health and safety policy, objectives and targets,
- b. procedures/controls related to the identified significant environment, health and safety aspects/risks regarding goods, equipment and services used by AT&T,
- c. operational controls related to contractors and other visitors to the workplace,
- d. communication of applicable procedures and requirements to employees and suppliers (including contractors and other visitors to the workplace).

#### **4.4.7 Emergency Preparedness and Response**

AT&T shall establish, document, implement and maintain a procedure(s) to identify potential emergency situations and/or accidents that could have an impact(s) on the environment and/or associated adverse health and safety consequences and how to respond to them.

In planning its emergency response AT&T shall take into account the needs of relevant interested parties, e.g., involving emergency services and neighbors.

AT&T shall respond to emergency situations and accidents and prevent or mitigate associated adverse environment, health and safety impacts/consequences.

AT&T shall periodically review and, where necessary, revise its emergency preparedness and response procedures/plans, particularly after the occurrence of accidents or emergency situations.

AT&T shall also periodically test such procedures/plans where practicable.

### **4.5 CHECKING**

#### **4.5.1 Performance Measurement and Monitoring**

AT&T shall establish, document, implement and maintain a procedure(s) to monitor and measure, on a regular basis, environment, health and safety performance identifying key characteristics of its operations that could have a significant environment, health and safety impact.

This procedure(s) shall provide for:

- a. both quantitative and qualitative measures appropriate to the needs of AT&T,
- b. monitoring of the extent to which AT&T's environment, health and safety objectives are met,
- c. monitoring the effectiveness of controls (for environment and health as well as for safety),
- d. recording of monitoring and measurement data and results to facilitate subsequent corrective/preventive action analysis.
- e. proactive measures of performance that monitor conformance with its environment, health and safety program(s), controls and operational criteria, and
- f. reactive measures of performance that monitor ill health, incidents (including accidents, near-misses, environmental releases, etc.), and other historical evidence of deficient environment, health and safety performance.

#### **4.5.2 Evaluation of Compliance**

Consistent with its commitment to compliance, AT&T shall establish, document, implement and maintain a procedure(s) for periodically evaluating EH&S compliance with applicable regulatory and legal requirements, as well as other requirements to which it subscribes.

All compliance evaluation results shall be documented and maintained.

### **4.5.3 Incident Investigation, Nonconformity, Corrective Action and Preventive Action**

#### **4.5.3.1 Incident Investigation**

AT&T shall establish, document, implement and maintain a procedure(s) to identify, record, investigate, and analyze relevant incidents in order to:

- a. determine underlying factors that might be causing or contributing to the occurrence of incidents using direct investigations, root cause analysis, etc.,
- b. identify the need for corrective action,
- c. identify opportunities for preventive action,
- d. identify opportunities for continual improvement, and
- e. communicate the results of such investigations.

The investigations shall be performed in a timely manner.

Any identified need for corrective action or opportunities for preventive action shall be dealt with utilizing the relevant parts of Section 4.5.3.2.

The results of incident investigations shall be documented and maintained.

#### **4.5.3.2 Nonconformity, Corrective Action and Preventive Action**

AT&T shall establish, document, implement and maintain a procedure(s) for dealing with actual and potential nonconformity(ies) and for taking corrective/preventive action.

The procedure(s) shall define requirements for identifying, investigating, evaluating, and correcting nonconformity(ies) and taking action(s), as appropriate, to:

- determine cause,
- mitigate EH&S consequences (enforcement action, unsafe work environment, illness/injuries, etc.),
- implement appropriate actions to avoid occurrence/recurrence,
- record and communicate the results of corrective/ preventive action(s) taken, and
- review the effectiveness of corrective/ preventive action(s) taken.

AT&T shall require that any necessary changes arising from corrective/ preventive action are made to its EH&S management system and related documentation.

Where the corrective/preventive action identifies new or changed hazards or the need for new or changed controls, the procedure shall require that new hazards or proposed controls be evaluated through an assessment process (e.g. risk assessment, etc.) prior to implementing the controls.

#### **4.5.4 Control of Records**

AT&T shall establish and maintain records as necessary to demonstrate conformity to the requirements of its Environment, Health and Safety Management System, AT&T Records & Information Management (AT&T - RIM) requirements, and results archived.

AT&T shall establish, document, implement and maintain a procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records.

Records shall be and remain legible, identifiable and traceable.

#### **4.5.5 Internal Environment, Health and Safety Management System Audit (Conformance)**



AT&T shall require that internal audits of its environment, health and safety management system are conducted and documented at planned intervals to determine whether its environment, health and safety management system:

- a. conforms to plans and directions as defined by EH&S management, including the requirements of this standard,
- b. has been properly implemented, documented, and maintained,
- c. is effective in meeting AT&T's policy and objectives, and
- d. provides information on the results of audits to AT&T's management.
- e. Audit program(s) shall be planned, established, implemented and maintained by AT&T, taking into consideration the environment, health and safety importance of the operation(s) concerned, the results of risk assessments of AT&T's activities, and the results of previous audits.

Audit procedure(s) shall be established, documented, implemented and maintained that address:

- responsibilities, competencies and requirements for planning and conducting audits, reporting results and retaining associated records, and
- determination of audit criteria, scope, frequency and methods.

#### **4.5 MANAGEMENT REVIEW**

A documented process shall be established for AT&T's senior leadership to review the environment, health and safety management system, at planned intervals, ensuring its continuing suitability, adequacy and effectiveness.

Reviews shall be documented and include assessing opportunities for improvement and the need for changes to its environment, health and safety management system, including environment, health and safety policy and environment, health and safety strategic objectives and targets. Records of AT&T's management reviews shall be retained.

Input to management reviews shall include:

- a. results of internal audits and evaluations of compliance with applicable legal and other requirements to which AT&T subscribes,
- b. results of relevant participation and consultation,
- c. relevant communication(s) from external interested parties, including complaints,
- d. environment, health and safety performance of AT&T,
- e. the extent to which environment, health and safety strategic and tactical objectives and targets have been met,
- f. status of significant incident investigations and corrective/ preventive actions,
- g. follow-up actions from previous management reviews,
- h. changing circumstances, including developments in legal and other requirements related to AT&T's environment, health and safety aspects/ hazards, and
- i. recommendations for improvement.
- j. The outputs from AT&T management reviews shall be consistent with AT&T's commitment to continual improvement and shall include decisions and actions related to possible changes to:
- k. environment, health and safety performance

- l. environment, health and safety policy, objectives, targets, and resources, and
- m. other identified elements of the environment, health and safety management system.

Relevant outputs from AT&T's management review including agenda, attendance, and meeting notes shall be made available for communication and consultation to appropriate impacted parties.