1 INTRODUCTION

Occupational Safety, health and environmental compliance audit examines the legal compliance of an organization or operation with applicable legislation regulations and licenses and other requirements to which the organization subscribes to. Compliance audits are applicable at project, site and organizational level and any other areas where the activities of the organization are taking place.

The legal compliance audit forms part of fulfilling the requirements of the organization to ISO 14000:2015, ISO 45001:2018 and ISO 9001:2015 management systems. This requires the services of a competent service provider to guide and advise on relevant occupational health, safety and environmental legislation.

2 OBJECTIVE

The objective of this SHE Legal Audit is to verify Eskom Rotek Industries compliance with applicable **Occupational Health & Safety** and **Environmental** legal requirements, where applicable internal policies, procedures, and management system commitments in line with ISO 45001:2018, ISO 14001:2015 and ISO 9001:2015 standards.

3 PURPOSE OF THE SHE LEGAL AUDITS

3.1 Identify gaps in legal compliance and risk exposure.

3.2 Provide recommendations for corrective and preventive actions.

3.3 Strengthen Eskom Rotek Industries Safety Health and Environmental management system and ensure continual improvement by the organisation.

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4 ESKOM ROTEK INDUSTRIES SCOPE OF OPERATION

Eskom Rotek Industries is made up of five Product Groups / Business Units and Support Functions. Namely Bulk Material services, Turbo Gen Services, Transformer and Switchgear Service, Logistics Services and Construction Services. Support Services function is made up of Human capital, Finance, Risk and Strategy and Governance and Compliance.

ERI has a total staff compliment of approximately 6500 employees and 7000 contractors. The following provides a brief outline of service offerings.

4.1 Bulk Materials Services Product Group Outline

The group manages bulk material handling activities such as ash, coal and water which is handled from a central place. It offers a wide range of services from delivering coal via road to power stations, to provision and maintenance of coal conveyer. The following are Bulk Material Services' core product offerings.

4.1.1 Bulk Water Supply Infrastructure Operations

Contracted to manage the Komati Water Scheme, a network of pipes originating at the reservoir in Mpumalanga and supplying water to various Eskom power stations. Part of the core function is the mechanical and electrical maintenance of three Pump Stations through engineering processes.

4.1.2 Coal and Ash Handling Operations

These coal operations focus on operation, maintenance and reclaiming of coal stockyards; screening and crushing of coal; operation and maintenance of ash dumps; rehabilitation of ash dumps; moving of conveyor structures.

4.1.3 Power Station Maintenance

Bulk Material Services offers electrical and mechanical maintenance to coal fired power stations including maintenance on transformers, generators, and motors ensuring.

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4.2 Turbo Gen Services

Turbo Gen Services is a turbine generator maintenance service provider. This division is uniquely positioned within the organisation because of its capability to refurbish large power generation turbines, generators and related equipment, with a special focus on the maintenance engineering of the turbine and the generator island.

4.2.1 Turbine and Generator Refurbishment

This process that takes place either on-site, or in the Turbo Gen Services Rosherville based workshops. The services offered refer to all maintenance, refurbishment, modification and repair of power generating and auxiliary equipment.

4.2.2 Power Station Maintenance

Turbo Gen Services manages turbine, generator and auxiliary specialised and first line maintenance on all Eskom power stations. Services include the executing of preventative and corrective maintenance, continuous standby assistance and call-out services on strategic plant.

4.2.3 Condition Monitoring

This service is rendered through condition monitoring by remote, on-line, as well as manual plant assessment.

4.3 Transformer and Switchgear Services

Transformer and Switchgear Services, a division of Eskom Rotek Industries, offers maintenance, refurbishment, repair and modification services for transformers and switchgear, both on site and at workshop facilities in Rosherville.

4.3.1 Transformer Services

On-site transformer services range from loading and off-loading, transporting, installation and commissioning, treatment of oil with mobile oil plants and performing various transformer tests together with technical assessments to determine the condition and general health of the transformer. Testing, servicing, repairs and replacement is performed in the field on tap-changers, bushings and auxiliary equipment.

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4.3.2 Switchgear Services

Switchgear maintenance involves work on all types of circuit-breakers, disconnectors and isolators, both AC and DC equipment of voltages from 11kV to 765kV. Switchgear services include installation and removal, routine maintenance, as well as refurbishment and repairs on site.

4.3.3 Engineering Services

Transformer and switchgear engineering services perform investigations into plant failure or poor performance; advise on repair strategies and provide cost versus benefit analyses.

4.4 Logistics Services Product Group Outline

Logistics Services offers road transport, materials handling, warehousing and road logistics services. These include the transport of boilers and turbines to and from power stations, transformers and switchgear from substations, poles and pylons to remote sites, as well as all power generation and distribution equipment.

4.4.1 Transport Services

Logistics Services ship anything from 1 kg to 500 tons anywhere in South Africa. It operates from its main yard in Rosherville, but has a wide network of depots in Johannesburg, Polokwane, Durban, Richards Bay, Cape Town, Middelburg and East London.

4.4.2 Materials Handling and Consolidation

In addition to transport services, Logistics Services offers the consolidation or breaking of bulk materials, not only for full utilisation of loads. The division also offers warehouse management services to its clients.

4.4.3 Waste Management

The management, collection, transport and disposal of waste as per the client’s requirements,

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4.5 Construction Services Product Group Outline

Construction Services (CS) specializes in both civil and electrical construction, from constructing conveyor systems at coal stockpiles; to terracing and reticulation in preparation for building new power stations; building and cabling sub-stations and erecting towers for power lines. The following are CS core product offerings:

4.5.1 Infrastructure Construction

CS constructs new substations of up to 765 kV and upgrade existing substations of all voltages. With a specialist road building team, CS construct all types of roads from gravel to regional and provincial black topped roads.

4.5.2 Cable Installation and Green Power Services

The service includes the installation and maintenance of underground cables in residential areas with specialist teams having been developed to operate under these unique conditions.

4.5.3 Power Line Construction and Electrification

Eskom Rotek Industries Construction Services is involved with installation of rural overhead reticulation networks. This includes erecting of wood or concrete pole structures; stringing of conductors; installation of all auxiliary equipment; and installation of meters and airdac in houses.

4.6 Support Services

The Support Services entails Business unit with specialised knowledge and expertise and provides standardised and consistent services to the whole organisation or the product groups. The support services are made up of: Human Capital Management, Risk & Strategy, Information management, Investigations and Loss control, and Finance, Commercial & Shared Services, Governance and Compliance. These business units perform centralised and sustained supporting activities in order for the operational areas to focus on the business at hand.

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5 SCOPE OF WORK

5.1 The SHE legal audit will cover:

5.1.1 Legal & Other Requirements

a) Review of compliance all applicable OHS and environmental legislation, regulations, standards, permits, and licenses as per the scope of the department/site/project.

b) Verification of recent updates, applicability, and alignment with business activities

c) The final audit sample will be agreed upon between the ERI and the service provider before the commencement of the contract.

5.1.2 ISO 45001:2018 (OHSMS) Requirements

a) Legal and other requirements identification (Clause 6.1.3).

b) Evaluation of compliance and evidence of compliance (Clause 9.1.2).

c) Operational controls for worker health and safety.

5.1.3 ISO 14001:2015 (EMS) Requirements

a) Compliance obligations (Clause 6.1.3).

b) Evidence of compliance evaluation (Clause 9.1.2).

c) Waste management, emissions control, and resource use compliance.

d) Permit and license conditions related to environmental management.

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6 DELIVERABLES

6.1 Audit Plan

Detailing timelines, sites to be visited, and key stakeholders to be engaged.

6.2 Audit Report /Checklist

Based on ISO 45001:2018 & ISO 14001:2015 legal and other compliance requirements.

6.3 Compliance Report

6.3.1 Detailed findings indicating compliant, partially compliant, and non-compliant areas.

6.3.2 Risk rating of findings as per the ERI auditing procedure.

6.3.3 Recommendations and required corrective actions.

6.3.4 Audit findings tracking register.

6.3.5 Close-Out Presentation: Present key findings and improvement actions to ERI management per site.

Note: The auditors will be expected to travel to ERI sites as per the final agreed scope. Therefor it will be advantageous to have a foot print in all provinces

7 METHODOLOGY

7.1 Document Review: Legal register, permits, risk assessments, procedures, records of compliance evaluation.

7.2 Onsite Verification: Physical inspection of facilities, observation of activities, sampling where necessary.

7.3 Interviews: Engagement with SHEQ personnel, line managers, and employees to confirm implementation.

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7.4 Compliance Evaluation: Compare current practices to legal and ISO requirement.

8 MINIMUM QUALIFICATIONS OF AUDITOR(S)

The auditor (s) shall have the following qualification as a minimum.

8.1 Bachelor of Laws LLB, B Tech Degree / B degree or equivalent in Environmental Health/Environmental managemnet/Safety management and 10 yrs experience in implementing and managing OHS systems and programmes.

8.2 SHE legislation training will be advantageous.

9 CONFIDENTIALITY OBLIGATIONS

The Service Provider shall treat as strictly confidential all information, data, documents, records, and materials (whether written, electronic, or verbal) obtained or accessed during the execution of this contract, including but not limited to company-sensitive, proprietary, legal, operational, and personal information ("Confidential Information"). The Service Provider shall not disclose, reproduce, or use such Confidential Information for any purpose other than fulfilling its obligations under this contract without prior written consent from the Client.

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10 BELOW IS THE LIST OF AREAS WITHIN ERI TO BE AUDITED:

Below is the list of areas within ERI to be audited:

Note: Sites may decrease, or increase based on project duration and new projects acquired at the time of the time of the audit.

Reports must be prepared/compiled and submitted on a site-specific basis rather than by department. E.g Majuba PS inclusive of all the departments on site.

No	Site	PG/SS	Departments
1	Majuba	BMS	Ash Handling Coal handling Coal Maintenance
		TGS	Maintenance Valves Service
2	Kusile	BMS	Ash & Coal Handling Coal and Maintenance Operation & Cleaning
		TGS	Maintenance Valves Service

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No	Site	PG/SS	Departments
		LS	Waste Management services
		CS	Cabling Dust Handling Plant Coal truck offloading facility
3	Medupi	BMS	Ash & Coal Handling Maintenance & Cleaning Auxiliary Plant
		TGS	Maintenance Valves Service
		LS	Waste Management Services
		CS	Medupi Substation Civil, Cabling and Stringing
			Medupi Rehabilitation P31c
			Medupi ADF P42
			Medupi P37a
4	Arnot	BMS	Ash Operations Ash Maintenance Coal Handling

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No	Site	PG/SS	Departments
			Coal Operations Coal Logistics
		TGS	Maintenance Valves Service
		LS	Waste Management Services
		CS	Arnot Storm Water Drainage.
5	Hendrina	BMS	Coal Operations Ash Dam & Maintenance Coal Logistics
		TGS	Maintenance
6	Matimba	BMS	Ash & Ash Handling
		TGS	Maintenance Valves Service
		CS	Matimba Substation Civil, Cabling and Stringing
7	Matla	BMS	Operating Ash Dam Operation
		TGS	Maintenance

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No	Site	PG/SS	Departments
			Workshop
		CS	Matla Unit 6 project
8	Grootvlei	BMS	Ash & Coal Handling Coal Logistics
		TGS	Maintenance Valves Service
9	Lethabo	BMS	Ash Operation
		TGS	Maintenance
10	Kendal	BMS	Ash & Coal Handling Operations Coal Logistics
		TGS	Maintenance Valves Service
11	Kriel	BMS	Ash Handling Coal Handling Coal Logistics
		TGS	Maintenance Valves Service

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No	Site	PG/SS	Departments
		CS	Kriel refurbishment project
12	Duvha	BMS	Ash Dam Coal Handling Conveyor maintenance Water treatment plant Ops & Cleaning
		TGS	Maintenance Valves Service
		LS	Waste Management Services
		CS	Duvha refurbishment project
			Duvha Emergency coal supply Project
13	Tutuka	BMS	Ash handling Operation Maintenance Coal Handling Operations

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No	Site	PG/SS	Departments
			Coal Logistics
		TGS	Maintenance
		CS	Tutuka refurbishment project
14	Camden	BMS	Ash Dams Coal Handling Operations Coal Logistics
		TGS	Maintenance Valves Service
15	Koeberg	TGS	Maintenance
		CS	Maintenance
16	Rosherville and Gauteng areas	TGS	Rosherville Workshop NDT Gen Services Mechanical services Balancing plant Bearing and on-site machining,

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No	Site	PG/SS	Departments
			RMF
		LS	Operations and Brokerage
			Warehouse
			Waste Management Services
			Multi-axle and Lowbed
			Technical
			Fleet Management including Facilities / Finance Services
			LS Supporting department
		SS	Strategy and Architecture
			Shared Services Office Services)
			PAS maintenance
			Materials Management
			Talent and Learning
			Medical Centre

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No	Site	PG/SS	Departments
			CCFME
			Security Risk Management
			Investigations and Loss Control
		CS	Apollo Substation
			Etna Substation
			Olympus Substation
			Pieterboth Substation
		T&SS	Switchgear - Site Services
			Transformer Site - Site Services
			SHEQ
17	Other Areas BMS	Mobile Plant	Mechanical and Electrical
		Ingula	Care & Maintenance
		Kilbarchan	Rehabilitation of the mine
		BMS KWS	Bulk Water Handling

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No	Site	PG/SS	Departments
		BMS Coal Logistics	Coal Logistic Operation
18	Other Areas LS	Operations and Brokerage	Polokwane
		Operations and Brokerage	Durban
		Operations and Brokerage	Kings Williams Town
19	Substations/Projects: Construction Services	Grassridge 3rd 400-132kV TrFr Project	EC
		Bufalo Substation Security project	EC
		Chivelston Ingangane Refurbishment Project	KZN
		Dedisa 3rd and 4th TrFr project	EC
		East Grid Silicon Coating Project	KZN
		Matla TrFr & Installation of FCLR project	MP
		Rockdale TrFr 12 Replacement and Emergency	MP
		Pembroke Refurbishment Project	EC
		Acacia Substation Refurbishment	WC
		Aurora Substation Refurbishment	WC

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No	Site	PG/SS	Departments
		Muldersvlei Substation Refurbishment	WC
		Ferrum Stringing and Cabling Work	NC
		Ferrum Refurbishment of Transmission Assets	NC
		Witkop Substation Cabling and Stringing	LP
		KWS (Wintershoek and Nooitgedatch Pumpstations)	MP
		KWS (Bosloop Pumpstation)	MP
		KWS (Vygeboom Pumpstation)	MP
		Prairie Substation High Risk TrFr Phase 3	MP
		Scafell Substation Refurbishment project	FS
		Hermes Substation Cabling and Stringing project	NW
		Balkfontein Substation	FS
		Sorata Substation	FS

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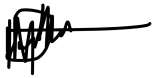

Diane Maunatlala

Acting SHEQ HOD

2026/11/05

Date

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