



HSE Document and Record Control Procedure

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1 General Provisions

1.1 Purpose

To establish a standardized and unified control mechanism for Health, Safety and Environment (HSE) documents and records; ensure full-process control of HSE documents throughout their lifecycle (including preparation, review, approval, issuance, use, revision and obsolescence); guarantee that current and valid versions of documents are promptly accessible and used at all relevant locations to prevent the misuse of obsolete documents; meanwhile, ensure that the filling, collection, cataloging, storage, review, access and disposal of HSE records comply with regulatory requirements and management needs. This procedure provides objective evidence for HSE risk control in business links such as material procurement, equipment supply, warehouse management and transportation logistics, and ensures the continuous and effective operation of the HSE management system. It is formulated in accordance with the *Work Safety Law of the People's Republic of China*, *Archives Law of the People's Republic of China*, and the requirements of PIPING SYSTEM PTE LTD and COMPANY's HSE management systems.

1.2 Scope of Application

This procedure applies to all HSE documents and records of Pipeline Materials and Equipment Co., Ltd. and its subordinate departments, branches and project departments (hereinafter collectively referred to as "all units"), covering their full-lifecycle management:

1. HSE Documents: Including HSE Management Manual (programmatic document), procedure documents (cross-departmental activity documents), operational documents (management systems, operating procedures, technical plans, emergency plans, HSE clauses in contracts, supplier HSE requirements) and external documents (government regulations, industry standards, superior documents);
2. HSE Records: Including HSE inspection records, training records, hidden hazard rectification records, supplier audit records, warehouse safety records, transportation safety records, accident/incident records, occupational health monitoring records, etc., covering all carriers such as paper, electronic media, audio and video;

3. Control Links: Applicable to the entire process of HSE documents and records, including planning, preparation, review, approval, issuance, distribution, use, revision, change, obsolescence and destruction of documents, as well as filling, collection, cataloging, storage, review, borrowing and disposal of records.

1.3 Referenced Documents

1. *Work Safety Law of the People's Republic of China*
2. *Archives Law of the People's Republic of China*
3. *Occupational Disease Prevention and Control Law of the People's Republic of China*
4. *HSE Management System Requirements (Q/SY1002.1)*
5. *HSE Document and Record Control Specifications*
6. *COMPANY HSE Document Management Measures*
7. *Pipeline Bureau HSE Record Management Regulations*
8. *Company HSE Risk Management Procedure*
9. *Company HSE Organization Setup and Responsibility Management Procedure*
10. *Company HSE Communication, Participation and Consultation Management Procedure*
11. *Company Record Control Procedure (General)*
12. *Company Archives Management Measures*

1.4 Terms and Definitions

1. HSE Documents: Refers to various carriers bearing HSE management information, divided into four levels:
 - Level 1: HSE Management Manual (programmatic document, elaborating policies, objectives and system structure);
 - Level 2: HSE Procedure Documents (cross-departmental activity documents, such as this procedure);
 - Level 3: HSE Operational Documents (departmental business documents, such as operating procedures and management systems);
 - Level 4: HSE Records (objective evidence documents, such as inspection records);

Classified into controlled documents (requiring version control for internal management) and uncontrolled documents (provided to external parties without update tracking) based on control requirements.

1. HSE Records: Refers to objective evidence formed to prove the implementation of HSE management activities, compliance with regulatory requirements and effectiveness of system operation, with traceability. They include paper records, electronic records (system ledgers, QR code scanning records), audio and video records, etc.

2. **Controlled Documents:** Refers to HSE documents requiring strict control over distribution scope, version updates and obsolete recovery. They are marked with "Controlled" identifier, version number (format: V Major Version No. Minor Version No., e.g., V1.0) and document number, and used for internal management.
3. **External Documents:** Refers to HSE-related documents issued by external entities of the Company, including government laws and standards, Group/Pipeline Bureau documents, supplier HSE qualification documents (work safety licenses, MSDS), etc.
4. **Document Change:** Refers to the modification, supplementation or deletion of HSE document content, which requires approval and retention of change records to ensure simultaneous updates at all usage locations.

2 Responsibility Assignment

2.1 Company Top Management

1. Approve programmatic documents such as the Company's HSE Management Manual and major HSE emergency plans;
2. Approve major resource investments for HSE document and record control (e.g., construction of electronic document management systems, procurement of archive storage facilities);
3. Approve document revisions involving adjustments to the Company's HSE management system structure.

2.2 Company Management Representative (HSE-in-Charge Leader)

1. Review the Company's HSE Management Manual, procedure documents, annual HSE document list and record template system;
2. Supervise the implementation of the HSE Document and Record Control Procedure, and coordinate cross-departmental document management disputes (e.g., document clause conflicts);
3. Approve the obsolescence and destruction of company-level HSE documents (e.g., major procedure documents).

2.3 Quality, Safety and Environmental Protection Department (HSE Centralized Management Department)

1. Act as the centralized management department for this procedure, responsible for the formulation, revision, interpretation and supervision of the procedure's implementation;
2. Take the lead in preparing the Company's HSE Management Manual and procedure documents, organize cross-departmental reviews, and establish and maintain the *Controlled HSE Document List* and *Applicable External HSE Document List*;

3. Uniformly design the Company's general HSE record templates (e.g., *HSE Hidden Hazard Investigation Record*, *Document Review Record*), and establish and maintain the *Company HSE Record List*;
4. Supervise the review, update and obsolescence of HSE documents by all departments, conduct special inspections on HSE documents and records every six months, and verify document validity and record standardization;
5. Be responsible for the maintenance of the HSE electronic document management system and unified management of company-level HSE record archives (e.g., major accident records, annual audit records);
6. Guide all departments and units in HSE document and record management, and provide training support (e.g., document preparation specifications, record filling requirements).

2.4 All Business and Functional Departments

2.4.1 Procurement Department

1. Prepare departmental HSE operational documents: *Supplier HSE Access Standards*, *HSE Clause Template for Procurement Contracts*, *Operating Procedures for Hazardous Material Procurement*, and submit them to the Quality, Safety and Environmental Protection Department for review and filing;
2. Identify and obtain external documents related to procurement business (e.g., *Hazardous Chemical Procurement Management Measures*, *Supplier Qualification Review Standards*), and establish the department's *Applicable External HSE Document Ledger*;
3. Fill in and maintain departmental HSE records: *Supplier HSE Audit Record*, *HSE Acceptance Record for Procured Materials*, *Document Change Application/Approval Form*, and regularly archive them to the archives management department;
4. Ensure that department employees use current and valid versions of HSE documents, and promptly recover obsolete documents (e.g., old-version supplier audit standards).

2.4.2 Logistics and Transportation Department

1. Prepare departmental HSE operational documents: *Transportation Vehicle Safety Management Regulations*, *Hazardous Material Transportation Plan Template*, *Carrier HSE Management Measures*, and submit them to the Quality, Safety and Environmental Protection Department for review and filing;
2. Identify and obtain external documents related to transportation business (e.g., *Rules for Road Transportation of Dangerous Goods*, *Vehicle Safety Inspection Standards*), and track document updates;
3. Fill in and maintain departmental HSE records: *Daily Inspection Record for Transportation Vehicles*, *Carrier HSE Performance Evaluation Record*, *Record Borrowing Registration Form*, and ensure that records are traceable in association with GPS monitoring data and driving recorder data;

4. Review departmental HSE documents (e.g., transportation regulations) regularly (quarterly), and promptly revise inappropriate clauses (e.g., adding safety requirements for new transportation routes).

2.4.3 Warehousing Center

1. Prepare departmental HSE operational documents: *Safety Storage Regulations for Warehoused Materials*, *Warehouse Fire Safety Management Measures*, *Emergency Disposal Plan for Hazardous Material Warehousing*, and submit them to the Quality, Safety and Environmental Protection Department for review and filing;
2. Manage HSE identification documents in the warehousing area (safety warning signs, material classification signs), and ensure that signs are consistent with current document requirements;
3. Fill in and maintain departmental HSE records: *Warehouse Fire-Fighting Facility Inspection Record*, *Hazardous Material Inbound/Outbound Ledger*, *Record Disposal Approval Form*, and ensure records are clear and complete;
4. Cooperate with the Quality, Safety and Environmental Protection Department in special document inspections, and provide evidence of document implementation related to warehousing (e.g., regulation training records).

2.4.4 Other Departments (Engineering Technology Department, Human Resources Department, Office, etc.)

1. Prepare HSE operational documents related to their business (e.g., *Equipment Safety Operation Technical Regulations* by the Engineering Technology Department, *HSE Training Management Measures* by the Human Resources Department), and submit them to the Quality, Safety and Environmental Protection Department for review and filing;
2. Identify and obtain external documents related to their business, fill in and maintain departmental HSE records, and regularly archive them;
3. Ensure that departmental documents are consistent with the Company's general documents (e.g., training record templates comply with the Company's unified requirements), and promptly update document versions.

2.5 All Units (Branches, Project Departments)

1. Based on the Company's HSE document list, prepare local supplementary HSE operational documents (e.g., *Interim Warehousing HSE Management Rules for Project Departments*), and submit them to the Company's Quality, Safety and Environmental Protection Department for review and filing;
2. Fill in local HSE records according to the Company's unified templates (e.g., *On-Site Operation HSE Supervision Record*, *Local Hidden Hazard Investigation Record*), and regularly submit them to the Company's corresponding departments and archives management department;

3. Be responsible for the controlled distribution and recovery of local HSE documents (e.g., issuing operational safety regulations to contractors), supervise the authenticity and completeness of record filling, and prevent the use of obsolete documents.

2.6 Archives Management Department

1. Be responsible for archiving and managing HSE records requiring permanent or long-term preservation (e.g., occupational health monitoring archives, major accident investigation reports) in accordance with the *Archives Management Measures*;
2. Provide HSE archive storage locations, and ensure that the storage environment meets requirements for moisture resistance, fire prevention, theft prevention and deterioration prevention (e.g., constant temperature and humidity warehouses, anti-magnetic cabinets);
3. Manage the review and borrowing of HSE archives, establish the *HSE Archive Review/Borrowing Ledger*, and supervise the use of confidential records (e.g., supplier audit records involving commercial secrets);
4. Assist all departments in evaluating the disposal of expired HSE records, and supervise the destruction process (e.g., participating in the destruction of major records as a supervisor).

2.7 All Employees

1. Use controlled HSE documents (e.g., operating procedures, emergency plans) as required, and shall not copy or disseminate uncontrolled versions or obsolete documents without authorization;
2. Fill in post-related HSE records standardizedly, ensure content is true, accurate and clear, and handwritten revisions require signature confirmation (only for clerical errors) without altering substantive content;
3. Promptly report outdated document versions, lost or damaged records to the department's HSE administrator or the Quality, Safety and Environmental Protection Department;
4. Participate in the review of HSE documents related to their posts (e.g., providing comments on operating procedure revisions), and put forward suggestions for improving record filling.

3 Work Procedures

3.1 HSE Document Control

3.1.1 Document Planning and Classification

1. Planning: In December each year, the Quality, Safety and Environmental Protection Department takes the lead in organizing all departments to conduct the next year's HSE

document planning, and determines the list of documents requiring addition or revision based on the following factors:

- Regulatory updates (e.g., new environmental protection standards), changes in Group/Pipeline Bureau document requirements;
- Company business changes (e.g., adding overseas procurement, warehouse expansion);
- Document defects identified in HSE system audits and management reviews;
- Document inappropriateness exposed by major accidents/incidents;

The planning results form the *Annual HSE Document Control Plan*, which is submitted to the Management Representative for review.

1. Classification: Conduct hierarchical control according to document levels to ensure a clear structure:

Document Level	Type Examples	Compiling Department	Approving Department	Control Focus
Level 1	HSE Management Manual	Quality, Safety and Environmental Protection Department	Top Management	System structure, policies and objectives
Level 2	HSE Procedure Documents (e.g., this procedure)	Quality, Safety and Environmental Protection Department	Management Representative	Cross-departmental processes, responsibility assignment
Level 3	Operational Documents (operating procedures, systems)	All business departments	Department Head + Quality, Safety and Environmental Protection Department (review)	Business details, operation steps
Level 4	HSE Record Templates	Quality, Safety and Environmental Protection Department	Management Representative	Evidence completeness, traceability

3.1.2 Document Preparation, Review and Approval

1. Preparation Requirements:

- Compliance: Comply with national laws and regulations, Group/Pipeline Bureau requirements, and align with business realities (e.g., procurement documents shall include HSE qualification review clauses for suppliers);
- Clarity: Use standardized terminology, avoid ambiguous expressions (e.g., "regular inspection" specified as "once a week", "qualified" with clear criteria);
- Uniform Format: Adopt the Company's unified template (font: Song Typeface 小四 [12pt], header: Company LOGO + document name, footer: version number + page number), and mark the document number (format: HSE-Level-Department Code-Year-Sequence No., e.g., HSE-3-CG-2026-01, where "3" represents Level 3 documents and "CG" represents the Procurement Department);
- Consistency: No conflicts with existing documents (e.g., consistent material handover requirements between warehouse regulations and transportation regulations).

1. Review:

- Level 1/Level 2 Documents: The Quality, Safety and Environmental Protection Department organizes cross-departmental reviews (e.g., reviewing this procedure requires soliciting opinions from the Procurement Department and Logistics Department), and forms the *Document Review Record* to record review comments and adoption status;
- Level 3 Documents: The compiling department organizes internal reviews, and solicits opinions from relevant departments if necessary (e.g., *Hazardous Material Warehousing Regulations* require soliciting opinions from the Engineering Technology Department), and submits them to the Quality, Safety and Environmental Protection Department for review.

1. Approval:

- Level 1 Documents (Management Manual): Approved by the Top Management;
- Level 2 Documents (Procedure Documents): Approved by the Management Representative;
- Level 3 Documents (Operational Documents): Approved by the Department Head and filed with the Quality, Safety and Environmental Protection Department;

After approval, the effective date is marked, and the document is included in the *Controlled HSE Document List*.

3.1.3 Document Distribution and Use

1. Distribution Scope:

- Controlled Documents: Determine distribution departments/posts based on the document's applicable scope (e.g., *Safety Storage Regulations for Warehoused*

Materials distributed to the Warehousing Center, Quality, Safety and Environmental Protection Department, and warehouse teams of all units);

- Uncontrolled Documents: Determine distribution objects based on external needs (e.g., *Supplier HSE Notification Letter* distributed to cooperative suppliers, not included in the controlled list).

1. Distribution Process:

- Paper Documents: The compiling department fills in the *Document Issuance/Recovery Record* (recording document name, number, version, receiving department/person, date), the Office prints uniformly, and controlled documents are stamped with the "Controlled" seal;
- Electronic Documents: Distributed through the Company's OA system and HSE electronic document management system; controlled documents are set with access permissions (only authorized personnel can view and download), and uncontrolled documents are marked with "Uncontrolled".

1. Use Requirements:

- Employees shall store current and valid versions of controlled documents at their workplaces, and shall not copy, alter or disseminate them without authorization;
- When documents are damaged or lost, apply to the distributing department for reissue and return the old versions (e.g., damaged *Transportation Vehicle Safety Regulations*);
- When employees are transferred from their posts, they shall return the controlled documents they hold (paper documents/electronic permission cancellation), and the department's HSE administrator shall record the recovery in the *Document Issuance/Recovery Record*.

3.1.4 Document Review and Update

1. Regular Review: In June each year, the Quality, Safety and Environmental Protection Department organizes all departments to conduct document reviews, and determines whether updates are needed based on the following contents:
 - Regulatory Compliance (e.g., compliance with the latest *Regulations on the Safety Management of Hazardous Chemicals*);
 - Business Alignment (e.g., adaptation to new equipment procurement and cross-border transportation business);
 - Implementation Effectiveness (e.g., presence of operational difficulties, clause conflicts, and high employee feedback);

After review, the *Document Review Record* is formed, determining three conclusions: "No Update Needed", "Partial Revision Needed", "Major Revision Needed".

1. Immediate Update: Immediate update is initiated when the following situations occur:
 - Major changes in national laws and regulations or Group/Pipeline Bureau requirements;

- Adjustments to the Company's organizational structure or business scope (e.g., adding branches, discontinuing procurement of certain materials);
 - Occurrence of major HSE accidents/incidents indicating document defects (e.g., revising *Warehouse Fire Safety Management Measures* after a warehouse fire);
 - Update requirements proposed in internal audits, management reviews or external audits.
1. Update Process: Implement in accordance with "Prepare Revision Draft → Review → Approve → Distribute → Recover Old Versions"; version numbers are upgraded (partial revision: V1.0→V1.1; major revision: V1.1→V2.0); revision pages shall indicate revision content, reasons, reviser and date; old versions are obsolete in accordance with Clause 3.1.6.

3.1.5 Document Change Control

1. Change Application: When partial modifications to documents are needed (e.g., adjusting audit frequency, supplementing operation steps), the change applicant (department HSE administrator) fills in the *Document Change Application/Approval Form*, explaining the change reason, content and involved clauses, and attaches the revision comparison draft.
2. Change Approval:
 - Changes to Level 1/Level 2 Documents: Approved by the original approving department (e.g., changes to the Management Manual approved by the Top Management);
 - Changes to Level 3 Documents: Approved by the Department Head and reviewed by the Quality, Safety and Environmental Protection Department;

When approved by a department other than the original approving department, document background materials (e.g., original approval opinions, current regulatory requirements) shall be provided.

1. Change Implementation:
 - Electronic Documents: Directly update the system version and notify all users to view the updated content;
 - Paper Documents: Handwritten changes are allowed (only for partial changes), requiring signatures of the changer and authorized person for confirmation, and recorded in the *Document Change Application/Approval Form*; major changes require reprinting and distribution, and old versions are recovered.
1. Change Verification: Within 1 month after the change, the Quality, Safety and Environmental Protection Department or the compiling department verifies the change effect (e.g., checking whether employees operate in accordance with the changed clauses) to ensure no implementation deviations.

3.1.6 Document Obsolescence and Destruction

1. Obsolescence Conditions:

- Documents have been replaced by new versions and the new versions have taken effect (e.g., Version V1.1 of *Supplier HSE Access Standards* is obsolete after Version V2.0 takes effect);
- The business corresponding to the document is cancelled (e.g., *Hazardous Material Procurement Regulations* are obsolete when procurement of certain hazardous materials is discontinued);
- Documents do not comply with current laws and regulations/standards (e.g., old-version *Environmental Protection Management Measures* do not meet the requirements of the new *Environmental Protection Law*).

1. Obsolescence Process:

- The compiling department fills in the *Document Obsolescence Application Form* (explaining the obsolescence reason, document name, number and version), and submits it to the original approving department for approval;
- The Quality, Safety and Environmental Protection Department marks "Obsolete" in the *Controlled HSE Document List*, notifies all distributing departments to recover old versions, and records the recovery in the *Document Issuance/Recovery Record*.

1. Destruction Management:

- **Obsolete Documents to Be Destroyed:** The compiling department fills in the *Document Destruction Record* (recording document name, number, quantity, destruction date, executor and supervisor); the Office uniformly destroys them (paper documents shredded by a paper shredder, electronic documents permanently deleted); the Archives Management Department supervises as a supervisor;
- **Obsolete Documents to Be Retained** (e.g., for legal traceability, knowledge preservation): Stamped with "Obsolete for Retention", stored separately in the Archives Management Department, isolated from current documents, and not used in daily operations.

3.1.7 External Document Control

1. Identification and Acquisition:

- Each department designates a dedicated person (HSE administrator) to identify external documents related to its business, and acquires them through channels such as government official websites, Group platforms and supplier provision (e.g., the Procurement Department obtains the updated version of *Hazardous Chemicals List* from the official website of the Emergency Management Bureau);
- For documents provided by external entities (e.g., suppliers' work safety licenses, MSDS), the receiving department shall verify their authenticity and validity (e.g., checking the validity period of licenses).

1. Registration and Distribution:

- Each department establishes the *Applicable External HSE Document Ledger* (recording document name, issuing unit, effective date, acquisition date, distributing department/person);
- Company-wide general external documents (e.g., *Group HSE Management System Requirements*) are uniformly registered by the Quality, Safety and Environmental Protection Department, included in the *Applicable External HSE Document List*, and distributed to relevant departments.

1. Update Tracking:

- Each department checks the update status of external documents quarterly (e.g., whether government regulations are revised, whether Group documents are revised); the Quality, Safety and Environmental Protection Department summarizes the update status every six months;
- After discovering document updates, promptly acquire the new versions, distribute them in accordance with Clause 3.1.3, and obsolete the old versions in accordance with Clause 3.1.6.

1. Control Requirements: If external documents are used as the basis for internal management (e.g., citing industry standards to formulate operating procedures), they shall be managed as controlled documents and marked with the "External Controlled" identifier.

3.2 HSE Record Control

3.2.1 Record Planning and Template Formulation

1. Planning: The Quality, Safety and Environmental Protection Department takes the lead in formulating the *Company HSE Record List* based on the following factors, clarifying record name, purpose, filling department, storage department and retention period:
 - Management Needs (e.g., inspection records used to verify risk control effects);
 - Regulatory Requirements (e.g., occupational health examination records shall be retained for 5 years after the employee's departure);
 - Business Characteristics (e.g., procurement requires supplier audit records, transportation requires vehicle inspection records).
1. Template Formulation:
 - General Record Templates (e.g., *HSE Hidden Hazard Investigation Record*, *Record Borrowing Registration Form*): Uniformly designed by the Quality, Safety and Environmental Protection Department, including record name, number, filling date, filler, reviewer, core content columns (e.g., hidden hazard location, description, rectification responsible person) and remarks column;
 - Department-Specific Templates (e.g., *Supplier HSE Performance Evaluation Form*): Designed by the department, submitted to the Quality, Safety and Environmental

Protection Department for review and filing to ensure consistency with general templates in format;

Templates are included in the *Company HSE Record List* and marked with version numbers.

3.2.2 Record Filling and Requirements

1. Filling Principles:

- Authenticity: Content shall objectively reflect actual situations (e.g., hidden hazard descriptions shall be accurate, not exaggerating "minor leakage" as "serious leakage");
- Accuracy: Data, dates and names shall be accurate (date format uniformly YYYY-MM-DD, full names for names without abbreviations);
- Completeness: All mandatory items shall be filled (e.g., hidden hazard rectification records shall include pre-rectification photos, rectification measures and post-rectification verification; if no photos, note "No on-site photos, with written explanation attached");
- Clarity: Handwritten records shall be neat; electronic records shall be free of garbled characters; revisions shall be crossed out (single horizontal line), with the reviser's signature and date noted (only for clerical errors, e.g., "2025" mistakenly written as "2024").

1. Filling Methods:

- Paper Records: Filled in with blue/black fountain pens or signature pens; no pencils or fading pens (e.g., ballpoint pens) shall be used;
- Electronic Records: Filled in through the Company's HSE record system, OA forms or Excel spreadsheets, with electronic signatures or filler names, and regularly backed up (once a week);
- On-Site Real-Time Records (e.g., warehouse patrols, transportation inspections): Filled in by scanning QR codes with mobile devices (e.g., HSE Hidden Hazard APP), automatically synchronized to the background system to avoid post-filling.

1. Review and Confirmation: After completing record filling, the department's HSE administrator or post supervisor shall review (e.g., the warehouse team leader reviews the *Warehouse Patrol Record*); after passing the review, sign for confirmation; if problems such as "incomplete filling" or "false content" are found during the review, return the record for re-filling.

3.2.3 Record Collection, Cataloging and Storage

1. Collection Frequency:

- Daily Records (e.g., daily inspection records for transportation vehicles): Collected daily and summarized by the department's HSE administrator;
- Regular Records (e.g., monthly HSE training records, quarterly document review records): Collected within 3 working days after the period expires;

- Special Records (e.g., supplier HSE audit records, accident investigation records): Collected within 5 working days after the completion of the special activity.

1. Cataloging Management:

- Each department catalogs records according to "Year-Record Type-Sequence No." (e.g., 2025-Warehouse Patrol-001), establishes the *Departmental HSE Record Catalog Ledger*, and notes record name, number, filing date and custodian;
- Cataloging shall facilitate retrieval (e.g., sorted by date, classified by record type); electronic records shall be set with retrieval keywords (e.g., "Supplier Audit-202503").

1. Storage Requirements:

- Paper Records:
 - Stored in designated storage locations by the Archives Management Department; the environment shall be moisture-resistant (humidity ≤60%), fire-proof (equipped with fire extinguishers), theft-proof (equipped with door locks) and pest-proof (equipped with insect repellents);
 - Important records (e.g., occupational health archives, accident records) shall be stored separately in anti-magnetic cabinets and constant temperature and humidity boxes, with restricted access permissions;
- Electronic Records:
 - Stored in the Company's HSE electronic document management system and dedicated servers, with access passwords and operation logs (recording operators and times of viewing, modifying and deleting) set;
 - Regularly backed up (incremental backup once a week, full backup once a month); backup media (hard disks, USB drives) shall be stored off-site (e.g., mutual backup between the Company headquarters and branches) to prevent data loss.

1. Custodian Responsibility: Each department designates a dedicated person as the HSE record custodian; when personnel change, handover procedures shall be conducted, and the *HSE Record Handover Ledger* shall be filled in (recording the name, quantity, date, handover person and supervisor of the handover records); the Archives Management Department shall supervise the handover.

3.2.4 Record Review, Borrowing and Confidentiality

1. Internal Review:

- When employees need to review departmental records for work purposes, they shall register in the *Record Borrowing Registration Form* (recording reviewer, record name, number, date and purpose), and review them at the storage location without taking them out;
- For cross-departmental reviews (e.g., the Quality, Safety and Environmental Protection Department reviews supplier audit records of the Procurement

Department), approval from the record custodian department head shall be obtained, and registration shall be made in the *Record Borrowing Registration Form*.

1. External Borrowing:

- When external entities (e.g., government regulatory authorities, audit units) need to borrow records, they shall provide valid certificates (e.g., inspection notices, audit letters), which shall be reviewed by the Quality, Safety and Environmental Protection Department and approved by the Management Representative;
- Only uncontrolled copies (marked with "For Review Only, No Other Use") shall be provided, not original records; the *Record Borrowing Registration Form* shall be filled in, with a clear borrowing period (generally no more than 7 working days).

1. Confidentiality Requirements:

- Records involving the Company's commercial secrets (e.g., HSE costs in supplier quotations) and employee privacy (e.g., occupational health examination reports) shall be marked with the "Confidential" identifier, and only authorized personnel can review them;
- When reviewing/borrowing confidential records, a *Confidentiality Commitment* shall be signed, and no copying or dissemination shall be allowed; violators shall be dealt with in accordance with the Company's confidentiality regulations.

3.2.5 Record Retention Period and Disposal

1. Retention Period: Determined by record importance level, clarified in the *Company HSE Record List*:

- General Records (e.g., daily patrol records, training attendance records): Retained for 3 years;
- Important Records (e.g., hidden hazard rectification records, supplier audit records, document review records): Retained for 5 years;
- Major Records (e.g., accident investigation records, occupational health monitoring archives, HSE management review records): Retained in accordance with national regulations or long-term (over 10 years); occupational health archives of employees shall be retained for 5 years after the employee's departure.

1. Disposal Process:

- Evaluation: When records reach the retention period, the custodian department fills in the *Record Disposal Approval Form*, explaining the record name, year, quantity, retention period and disposal suggestion ("Destroy" or "Extend Retention"), and attaches the *Record Disposal List*;
- Approval: Disposal of general records shall be approved by the department head; disposal of important/major records shall be reviewed by the Quality, Safety and Environmental Protection Department and approved by the Management Representative;
- Destruction:

- Paper Records: Uniformly destroyed by the Archives Management Department; the *Record Destruction Record* shall be filled in (recording the name, quantity, date, executor and supervisor of the destroyed records); methods such as shredding by a paper shredder or destruction by professional institutions shall be adopted;
- Electronic Records: Permanently deleted by the IT Department, with all backups cancelled; the *Electronic Record Destruction Record* shall be filled in to ensure irrecoverability;
- Extended Retention: Records requiring extended retention due to legal disputes or historical traceability shall be marked with "Extended Retention" and the extended period (e.g., "Extended to 2030"), stored separately, and included in the next disposal evaluation;
- Post-Disposal Archiving: The *Record Disposal Approval Form* and *Record Destruction Record* shall be retained for 3 years; records with extended retention shall be re-included in the *Departmental HSE Record Catalog Ledger*.

3.3 Abnormal Situation Handling

1. Document Version Errors: When outdated or incorrect document versions are found in use (e.g., warehouse staff using Version V1.0 of *Hazardous Material Storage Regulations*), immediately stop using them; the department's HSE administrator applies to the Quality, Safety and Environmental Protection Department for the latest version, recovers the old versions, and records the recovery in the *Document Issuance/Recovery Record*; analyze the error causes (e.g., distribution omissions, failure to promptly communicate update notifications), and take corrective measures (e.g., supplementary distribution, organizing document update training).
2. Record Loss/Damage: When record loss (e.g., lost transportation inspection records) or damage (e.g., blurred paper records due to moisture) is found, the custodian department immediately reports to the Quality, Safety and Environmental Protection Department:
 - Supplementary Filling Allowed: For daily patrol records, the filler shall supplement the filling based on memory of actual situations, note "Supplementary Filling" and the reason (e.g., "Original record lost, supplementary filling based on memory"), confirm with the reviewer, and attach supporting materials (e.g., colleague confirmation, system backup screenshots);
 - Supplementary Filling Not Allowed: For accident on-site records, collect supporting materials (photos, witness testimonies, videos), form the *HSE Record Loss Explanation*, and submit it to the Quality, Safety and Environmental Protection Department for filing; prevent similar situations from recurring (e.g., strengthening record backup).
1. Electronic Document System Malfunction: When the HSE electronic document management system is inaccessible or data is damaged, the IT Department immediately activates the emergency plan (switching to the backup system, restoring the latest backup data); the Quality, Safety and Environmental Protection Department coordinates

all departments to temporarily use paper documents/records; after the malfunction is resolved, synchronize the data (e.g., entering temporary paper records into the system); form the *System Malfunction Handling Report*, analyze the malfunction causes (e.g., server downtime, hacker attacks), and formulate preventive measures (e.g., server upgrade, strengthening network protection).

4 Relevant Documents and Records

4.1 Relevant Documents

1. *HSE Management Manual*
2. *HSE Risk Management Procedure*
3. *HSE Organization Setup and Responsibility Management Procedure*
4. *HSE Communication, Participation and Consultation Management Procedure*
5. *Supplier HSE Management Measures*
6. *Contractor HSE Management Measures*
7. *Record Control Procedure (Company General)*
8. *Archives Management Measures*
9. *Company Confidentiality Management Regulations*

4.2 Record List

Record No.	Record Name	Filling Department	Storage Department	Retention Period
HSE-JL-001	<i>Document Preparation/Revision Approval Form</i>	All compiling departments	Quality, Safety and Environmental Protection Department	5 years
HSE-JL-002	<i>Document Issuance/Recovery Record</i>	All compiling departments	Quality, Safety and Environmental Protection Department	5 years
HSE-JL-003	<i>Document Review Record</i>	All compiling departments	Quality, Safety and Environmental	5 years

			Protection Department	
HSE-JL-004	<i>Document Change Application/Approval Form</i>	All compiling departments	Quality, Safety and Environmental Protection Department	5 years
HSE-JL-005	<i>Document Obsolescence Application Form</i>	All compiling departments	Quality, Safety and Environmental Protection Department	5 years
HSE-JL-006	<i>Document Destruction Record</i>	Office	Archives Management Department	5 years
HSE-JL-007	<i>Controlled HSE Document List</i>	Quality, Safety and Environmental Protection Department	Quality, Safety and Environmental Protection Department	Long-term
HSE-JL-008	<i>Applicable External HSE Document List</i>	Quality, Safety and Environmental Protection Department	Quality, Safety and Environmental Protection Department	Long-term
HSE-JL-009	<i>Company HSE Record List</i>	Quality, Safety and Environmental Protection Department	Quality, Safety and Environmental Protection Department	Long-term
HSE-JL-010	<i>Record Borrowing Registration Form</i>	Record custodian departments	Record custodian departments	3 years
HSE-JL-011	<i>Record Disposal Approval Form</i>	Record custodian departments	Archives Management Department	5 years

HSE-JL-012	<i>Record Destruction Record</i>	Archives Management Department	Archives Management Department	5 years
HSE-JL-013	<i>HSE Record Handover Ledger</i>	Record custodian departments	Record custodian departments	5 years
HSE-JL-014	<i>Supplier HSE Audit Record</i>	Procurement Department	Archives Management Department	5 years
HSE-JL-015	<i>Daily Inspection Record for Transportation Vehicles</i>	Logistics and Transportation Department	Archives Management Department	3 years
HSE-JL-016	<i>Warehouse Fire-Fighting Facility Inspection Record</i>	Warehousing Center	Archives Management Department	3 years
HSE-JL-017	<i>HSE Hidden Hazard Investigation Record</i>	All departments/units	Archives Management Department	5 years

5 Appendix

Appendix A Explanation of HSE Document Numbering Rules (Including Level and Department Code Comparison Table)

Appendix B HSE Document Preparation Template (Including Templates for Management Manual, Procedure Documents and Operational Documents)

Appendix C Templates of *Document Issuance/Recovery Record* and *Document Change Application/Approval Form*

Appendix D General HSE Record Templates (Including Templates for *HSE Hidden Hazard Investigation Record* and *Record Disposal Approval Form*)

Appendix E Operation Guide for HSE Electronic Document Management System (Including Permission Setting and Backup Process)

Appendix F Requirements for HSE Record Storage Locations (Moisture-Proof, Fire-Proof and Theft-Proof Technical Standards)

Appendix G Template of *Confidentiality Commitment* (For External Review of Confidential Records)