Vedanta Resources Plc

Sustainability Governance System

Management Standard

Competency, Training and Awareness

Management Standard – Competency, Training and Awareness

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Management Standard – Competency, Training and Awareness

1. PURPOSE

Vedanta Group shall ensure all employees including front-line leaders, senior managers and including contractor employees working on Vedanta sites are competent to carry out their work activities effectively and manage the associated risks and impacts appropriately. Employees shall be equipped with the necessary knowledge, skills and behaviours to provide a basis for continuous improvement, to protect the day-to-day health and safety of employees and contractors and to contribute to the long-term sustainability of the Vedanta Group, the environment and communities in which the business operates.

2. SCOPE

This Management Standard is mandatory and applies to all Vedanta subsidiaries, operations and managed sites, including new acquisitions, corporate offices and research facilities and to all new and existing employees and contractor employees. This Standard is applicable to the entire operation lifecycle (including exploration and planning, evaluation, operation and closure).

3. DEFINITIONS

Definitions of key terms used in this document are shown in the following table.

Term	Definition
Coach	Someone who supports an individual, referred to as a coachee, through the process of achieving a specific personal or professional result. The structure and methodologies a coach may adopt are numerous but are predominantly facilitation in style; that is to say that the coach mainly asks questions and challenges the coachee.
Coaching	The practice of supporting an individual towards a specific personal or professional result.
Competency	A combination of knowledge, skills and behaviours which enable individuals to undertake responsibilities and perform activities to a recognised standard and quality on a consistent basis.
Competent Person	An individual who has the necessary and sufficient knowledge, skills and behaviours as well as the necessary experience (practice) to complete their responsibilities safely, effectively and consistently.
Competency Gap	This is the difference (gap) between an individual's current knowledge, skills and behaviours, and that of the knowledge, skills and behaviours that they require to fulfil a task safely and effectively.
Competency Assessment	An evaluation of whether the participant has achieved the learning outcomes through demonstrating knowledge, skills or appropriate behaviours.
Employment	A group of employees who have a similar role, responsibilities or exposure

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Term	Definition
Group	to risk and therefore have comparable competency requirements. This is often also linked to leadership level.
Formal Training	Recognised, accepted and prescribed training with a set and replicable structure.
Informal Training	Training which does not necessarily have a specific structure, curriculum or formalised trainer such as on-the-job training. This can be a very effective form of training through providing a positive example, guidance and practical experience in context of the activity in question.
Mentor	A more experienced or more knowledgeable person who helps a less experienced or less knowledgeable person (the mentee).
Mentoring	A strategy that matches a more experienced worker with a less experienced worker to provide regular opportunities for sharing of advice and knowledge.
Operation(s)	A location or activity that is operated by a Vedanta Company and is part of the Vedanta Group. Locations could include mines, refineries, ports or transportation activities, wind farms, oil and gas development sites, offices including corporate head offices and research and development facilities.
Training Service Provider	A company which provides contractors to deliver training to an approved standard.
Training Needs Analysis	A process for identifying the training requirements (or needs) for different roles and risks.
Vedanta Company	A subsidiary of Vedanta Group either fully or majority owned that has its own management structure (e.g. Hindustan Zinc Limited, Vedanta Aluminium Limited, Sterlite Industries limited, etc.)

4.   PROGRAMME REQUIREMENTS

All Vedanta subsidiary companies and operations are required to have a Competency, Training and Awareness programme which contains the following elements. The management of these elements is described in detail below.

4.1.   Training Principles

Training is intended to develop appropriate *knowledge*, *skills* and *behaviours* which will enable individuals to become competent in their roles, to fulfil their responsibilities and required activities in their specific environment whilst remaining safe, healthy and simultaneously contributing to the overall long-term sustainability of the Vedanta Group. In this way, training is a key risk mitigation method for the business. Training shall be based on the following principles:

a)   Training shall be provided to both employees and contractors based on role, risk, and responsibilities;

b) The training programme shall seek to ensure competency and quality outcomes rather than only training attendance;

c) The training programme shall focus on the needs of the audience and use different learning methods to cater for differing needs, and

d) Training shall be an ongoing and iterative process.

4.2. Competency Framework

Competency derives from the three elements of knowledge (through provision of information) which over time becomes skill (through coaching and practice) and leading on from this, the ability to demonstrate positive behaviours (through acting out the correct messages and responsibilities). Training shall target all three elements cumulatively in order to achieve competency.

In order for the business to understand what competencies are required as well as a current state of the existing competencies within the business, a Competency Framework shall be created.

a) The first stage of the Competency Framework is to identify the knowledge, skills and behaviours required per job function, taking into consideration associated risks and activities, legal and regulatory requirements and leadership level and responsibilities;

b) Competency frameworks shall be designed on a stepped scale for example competency levels 1-3 or 1-5 to reflect the different competency requirements of different employee groups for each subject area. The following example is based on a management of change:

Change Management Competency Level 1	Change Management Competency Level 2	Change Management Competency Level 3
Knowledge that a change in person, equipment, process or environment can increase risk. Understanding that many incidents occur as a result of poorly managed changes. Awareness that any changes which affect a person or process needs to be communicated to all affected parties	Ability to identify needs for change management and communicate this to staff. Ability to be involved in a Change Management processes and organise associated people and resources. Will raise awareness of the importance of Change Management with peers and reports	Champions the importance of Change Management at an operational level. Assesses the effectiveness of change management at an operational level. Seen as a subject matter expert and can provide advice and expertise to operations in implementing Change Management processes.

c) The second stage of the Competency Framework is to identify which existing competencies individual employees and contractors have. Existing education, training, qualifications and experience shall be considered in context of the skills required to fulfil their role, however it is advised that baseline training is repeated for high risks. This process will confirm what skills

are currently in place for the existing workforce and gaps which need addressing through the Training Needs Analysis, and

d) Specific competencies for the Vedanta Group Sustainability Programme shall be developed which will include Stakeholder Management, Human Rights, Community Consultation, Environmental Impacts and Controls, Health and Safety Hazards and Controls.

4.3. Training Needs Analysis

The Competency Framework will dictate Competency Requirements, and when these are mapped against existing employee and contractor skills, a Training Needs (or Gap) Analysis will result. Where gaps are identified, these must be addressed through a defined training plan stating who requires training in which areas, to which competency level, and who will provide this training.

A Training Needs Analysis shall be completed as follows:

a) For all employees and contractors as a baseline. Training needs must be created on a yearly basis for each operation based on risk;

b) For new employees and contractors. This must address the risks and responsibilities including appropriate induction and skills building. Training requirements for new starters must be identified with a development plan to address the increased risk of their presence due to inexperience;

c) Within Change Management Processes. If there are any planned or unplanned changes to scope, environment, legislation, equipment, personnel, operational conditions or processes, training must be provided to ensure any additional risk is mitigated, and

d) When an incident has occurred and training is identified as either a contributing or causal factor.

High risk groups must be identified, such as new starters, who require additional and immediate mitigations such as additional supervision alongside a coaching and training plan to address competency gaps.

4.4. Training Delivery

Training Delivery is a critical consideration to ensure the effectiveness of learning and competency. Training programmes must be developed and delivered based on the outcome of the Training Needs Analysis. Training can be delivered in-house and/or through external training providers, however the following shall be considered as a minimum for both types of training:

a) Consideration of the audience being trained, including language and literacy abilities;

b) Setting objectives (goal, purpose and intent) of the training based on the required competencies;

c) Use of the most appropriate (and varied) training methods for the required competencies;

d) Ensure that the trainers or facilitators are experienced and/or qualified to deliver training. Checks must be made on external trainers, such as asking for copies of relevant training certificates and references;

e) Where internal courses are deployed by internal staff, 'Train the Trainer' courses shall be provided to equip trainers with the skills necessary to train on internal Vedanta requirements and practices, and

f) Training for significant risks shall be repeated every year as a minimum for all employees and contractors.

4.5. Training Design & Content

In order to be effective, trainers must spend time planning training sessions to ensure that learning objectives are clear, achievable and that training is pitched at the appropriate level, speed and tone using the appropriate style for the audience and environment. The following elements shall be considered during training:

- Existing knowledge of the audience;

- Learning objectives;

- Appropriateness of training method(s);

- Variety of training methods;

- Communication style, both verbal and non-verbal;

- Cultural awareness;

- Energy level and engagement with the audience;

- Competency verification, and

- Ability to respond to questions and misunderstandings.

4.6. Training Methods

Training can comprise both formal and informal training methods for example:

Formal	Informal
E-Learning	Coaching
PowerPoint	Mentoring
Classroom Training	Background Reading
Flip Chart sessions	On-the-job learning

Formal	Informal
Learning based games	Focused discussions
Toolbox Talks	Leading by Example

Using a combination of these methods, effective trainers, both internal and external to the organisation will be able not only to transfer knowledge and tangible skills, but also behaviours, organisational culture and values. It is in influencing this culture where Vedanta can achieve long-term risk reduction.

4.7. Inductions

Inductions for new employees (to their role, responsibilities, site and relevant risks), contractors (to their role, responsibilities, site and relevant risks) and visitors (to the site and relevant risks) must be provided. Inductions will be maintained and delivered consistently by competent personnel and should cover as a minimum:

a)   Induction to site;

- Site orientation, site rules and no-go areas;

- Emergency procedures and medical facilities;

- Site hazards and associated risk controls;

- Incident reporting procedures, and

- An overview of group and site-level Sustainability Policies.

b)   Induction to Role and Responsibilities

- Requirements and risks associated with the role;

- Expectations and responsibilities;

- Company and site Policies, Systems and Standards;

- Integrated Health, Safety and Sustainability practices, and

- Relevant risks and control measures for Vedanta operations and activities.

Employees, contractors and visitors receiving induction training shall confirm through documented acceptance that induction training has been provided.

All new employees and contractors shall receive induction training on starting their job function or as a minimum, within 1 month of their start date. Additional supervision will also be implemented until the individual is deemed and documented competent to work alone.

All employees that change job function shall receive refresher training prior to starting the new function. Any employee that has been off work for more than six months shall receive refresher training on their return to work.

4.8. Training Resources

Training resources shall be varied, appropriate to the audience, activity and environment wherever possible with maximum use of examples and case studies to maximise the impact and longevity of the messages conveyed. For example use of the following shall be considered:

- Multimedia (photos, audio, videos);

- Incident Investigations;

- Practical scenarios and role-plays, and

- Company and industry safety shares and case studies.

4.9. Competency Assessment

During or at the end of training, competency shall be assessed by someone who is qualified to do so using consistent and demonstrable criteria. The acquired competency can then be added to the individual's training record.

For contractors, due to the increased risk profile, and in line with Contractor Management practices, businesses shall assess the competency of all contractors prior to their appointment on Vedanta projects to ensure levels of competency are appropriate to the scope of work being undertaken.

Vedanta employees assessing contractor competencies shall have the appropriate level of skill and expertise to conduct the assessment. Contractor qualifications shall be requested and maintained on record. The competency of subcontractors conducting activities contracted out by approved contractors shall be assessed and documented by the approved contractor and Vedanta. Where gaps in competencies are identified, appropriate training shall be provided in conjunction with increased levels of supervision.

4.10. Recording & Reporting

Businesses shall ensure that participation in internal and external training is recorded and records are valid, up to date and kept secure, typically in the personnel training file. Only an approved internal or external trainer can issue a certificate of training or training attendance. Copies of training and evaluation materials shall be retained.

As a minimum, training records shall include the date of training, location, name of trainee(s), name of training course or competency, pass or fail (where applicable and if so, reasons where possible), level of competency achieved, sign-off by relevant authorised trainer, any relevant certification achieved and any remedial actions (for example in the case of competency not being achieved).

Documented checks on the qualifications and experience of employees and contractors where their qualifications are relevant shall be maintained where required. For example, new employees and contractors shall be asked for their technical certificates such as a driver's licence and qualifications for operation of specialist machinery.

Reporting on training gaps, progress on gaps or training courses undertaken shall be measured as a Key Performance Indicator for the operation.

4.11. Quality Assurance

Training programmes shall be evaluated and reviewed for quality to ensure they are appropriate and effective. This shall be done through use of trainee questionnaires, course evaluations or equivalent. Training programme effectiveness shall be evaluated by a nominated individual to ensure that any areas for improvement are considered in subsequent training. Course evaluations should include feedback on training content (how relevant, useful, up-to-date, use of training methods etc), training delivery (pace, tone, speed, clarity etc), and include space for attendees to identify the strengths of the training and suggest improvements for future courses.

External and internal training provision must be observed as part of a workplace audit programme. Incident investigations shall be regularly reviewed to ascertain the effectiveness of training where it may have been a causal or contributing factor in an incident.

As part of internal trainer quality assurance, a Trainer Development Plan shall be created, as part of a 'Train the Trainer' programme to enable internal trainers to improve through experience, feedback and learning.

Periodic review meetings with external training providers shall be undertaken which include an assessment of external training reports and feedback discussion to facilitate continuous improvements.

5. ROLES AND RESPONSIBILITIES

Vedanta Resources, subsidiaries, businesses, operations and sites shall ensure that roles and responsibilities for implementing and complying with this Standard are allocated. Key responsibilities shall be included in job descriptions, procedures and/or other appropriate documentation.

6. COMPLIANCE AND PERFORMANCE

Each Vedanta operation shall ensure they comply with the requirements of this standard. Performance against meeting the requirements of this Standard shall be assessed periodically, documented and, where required, reported to Vedanta Group. The assessment of performance shall include setting and reporting on key performance indicators (KPIs) where these have been established at Vedanta Group, Company or local level and which meet the requirements as set out in the *Sustainability Data Management Technical Standard*.

The evaluation of performance shall include, as a minimum, confirmation that:

- A training programme is in place, is documented and includes both employees and contractor employees, where applicable;

- Training certificates are held on record;

- Competency Frameworks have been developed and are available;

- Training needs assessments have been conducted and, where gaps have been identified, these have been addressed/closed out and reported;

- Trainers or facilitators have the appropriate experience and/or qualifications to deliver training and, where commissioned, external trainers training certificates and references are held on record;

- Where significant risks have been identified, training has been provided to all employees and contractor employees within the past 12 months;

- All employees, contractor employees and visitors have received induction training. New employees and contractors have received induction training on starting their job function or as a minimum, within 1 month of their start date. All employees that change job function have received refresher training prior to starting the new function. Any employee that has been off work for more than six months has received refresher training on their return to work; and

- A Trainer Development Plan has been created as part of a 'Train the Trainer' programme.

7. REVIEW

This Management Standard shall be periodically audited and reviewed to determine its accuracy and relevance with regard to legislation, education, training and technological changes. In all other circumstances, it shall be reviewed no later than 24 months since the previous review.

8. REFERENCES

Doc. Ref.	Title
MS 10	Data Management, Performance Monitoring and Reporting
TS 06	Supplier and Contractor Management
TS 21	Sustainability Data Management