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1. Definitions

HSE: Health, Safety and Environmental

HSE improvement plan: A document, which defines the corrective or preventive actions needed to improve HSE performance.

HSE Committee: The committee at the site in charge of monitoring all HSE matters, especially the HSE improvement plan.

Site: Defined area where the activity takes place.

Management: Management of PROJECT activities at a specific location.

Risk: A combination of the probability (or frequency) of occurrence of a defined hazard and its estimated cavity.

Simultaneous Operations: Two or more major activities (construction, modifications, production) carried out in the same vicinity at the same time potential interference creating notable risks.

Specification: All internal rules and regulations adopted by PROJECT.

System: Organization structure, responsibilities, procedures, processes and resources needed to implement HSE management.

Approved: An internationally recognized approval authority and/or the company have approved the item or procedures shall Indicates a mandatory course of action and should Indicates a preferred or recommended course of action.

TPA: Third Party Authority.

PPE: Personal Protective Equipment.

MSDS: Material Safety Data Sheet.

PTW: Permit to Work.

2. Purpose

This document is to define the general technical guidelines established by the *Contractor's name* Engineering to provide all personnel with safe operating practices and awareness for the work they perform in the course of their duties during construction time.

3. Scope

This document must be applied to the entire project. Plant construction site, employees, and subcontractors, and must be considered as a minimum requirement. The application of this plan is the direct responsibility of the management and all employees, subcontractors and vendors involved in its day- to-day application

4. Health and Safety Policy Statement of Intent

This Health and Safety Policy Statement recognizes *Contractor's name* obligations under the State standard and regulations. This policy statement and the health and safety documentation detailing the means of implementing the policy are in respect of *Contractor's name* and its operating businesses.

Company has a moral and legal obligation to safeguard, so far as is reasonably practicable, the health, safety and welfare of their employees and anyone who may be affected by the actions of the Company, its employees, or as a result of *Contractor's name* activities. *Contractor's name* fully accepts their obligations and responsibilities, which will be achieved by:

- Meeting its responsibilities as an employer to do all that is reasonably practicable to prevent accidents, injuries and damage to health.
- Providing and maintaining safe working environments that are without risks to health, safety and welfare. Limiting adverse effects on and adjacent to the area in which those activities are carried out.
- Ensuring all employees play an active part in the health and safety of the Company by consulting with them and providing them with adequate
- information, instruction, training and supervision for them to understand their role within the Company.
- Setting standards that comply with the relevant statutory requirements relating to health, safety and welfare with regard to the effect on employees, contractors, visitors and the public.
- Safeguard employees and others from foreseeable hazards connected with work activities, processes and working systems.
- Ensuring that hazardous areas are kept secure from the public, employees or tenants, or contractors not required to enter them.
- Ensuring that when new substances, plant, machinery, equipment, processes or premises are introduced, adequate guidance, instruction, training and supervision are provided for safe methods of work to be developed.
- Ensuring that all plant and equipment is maintained in a safe condition and is subject to routine and statutory inspections and examinations.

- Ensuring that subcontractors undertaking work for the Company are informed of the relevant standards required and are monitored to ensure
- Compliance without detracting from the contractors' legal responsibilities to comply with statutory requirements.
- Provide adequate resources to comply with statutory requirements concerning the health, safety and welfare of all those affected by its activities.

Employees are required to cooperate with the Company not only to ensure their personal safety, but also to ensure they are not prosecuted for breach of legislation or have disciplinary action taken against them by the Company for breach of Company rules.

The Company will communicate the Health and Safety Policy to all employees, and it will be freely available to customers, shareholders and the general public. This policy will be reviewed quarterly and updated as/if required to conform to current legislation and customer's requirements.

This Policy, supported by Instructions, Procedures and Organizational Arrangements, is to be applied to all activities carried out by the Company.

Company commits to the:

- Establishment of HSE management systems and programs and endorsement of them at all levels.
- Education and understanding of HSE systems, plans and practices for all Project personnel and other parties involved in activities where there is a chance of personal injury /'illness or Environmental harm.
- Enforcement of all HSE policies, procedures, plans and preventive measures.
- Education of HSE management systems, plans and programs to ensure ongoing continuous improvement in providing and maintaining a safe, healthy and environmentally responsible workplace.

The company will achieve these commitments by:

- Continued development and implementation of management plans to eliminate or control hazards associated with the operations.
- Involving all employees in HSE programs through consultation, participation and using an effective proper communication system.
- Ensuring that HSE policies, procedures and practices are in accordance with the legislative requirements, industry and standards and best practice concepts.
- Ensuring that all relevant HSE legislation, regulations, codes and licenses are complied with.
- The development and implementation of training programs to ensure that employees, supervisors and managers are familiar with, and understand HSE principles, policies, procedures and practices.
- Ongoing implementation of Environmental management plans through pollution

- prevention, eco-efficiency and waste avoidance, reduction, re-use, recycling and natural resource management.
- Organizing of effective emergency and injury management plan.
- Ensuring that all potential HSE impacts are considered prior to changes to the business or operations.
- Providing levels of supervision appropriate to the nature and risk of the task being performed.
- Ensuring that the suppliers and contractors are aware of and comply with the requirements of the company.
- Using HSE policies, procedures, practices and legislative requirements where applicable.
- Conducting regular HSE management audits and inspection in due time, and developing and monitoring defined HSE objectives. All employees, contractors, vendors and visitors shall comply with this present HSE policy whilst involved in Project operations. It is the responsibility of all managers and supervisors to ensure understanding, implementation and enforcement of this policy. That HSE policies, procedures and practices are in accordance with the Legislative requirements, industry and standards and best practice concepts.
- Ensuring that all relevant HSE legislation, regulations, codes and licenses are complied with.
- The development and implementation of training programs to ensure that Employees, supervisors and managers are familiar with, and understand ISE principles, policies, procedures and practices.
- Ongoing implementation of Environmental management plans through pollution prevention, eco-efficiency, and waste avoidance, reduction, re-use, recycling and natural resource management.
- Organizing of effective emergency and injury management plan
- Ensuring that all potential HSE impacts are considered prior to changes to the business or operations.
- Providing levels of supervision appropriate to the nature and risk of the task being performed.
- Ensuring that the suppliers and contractors are aware of and comply with HSE policies, procedures, practices and legislative requirements where applicable.
- Conducting regular HSE management audits and inspection in due time, and developing and monitoring defined HSE objectives.
- All employees, contractors, vendors and visitors shall comply with this present HSE
 policy whilst involved in Project operations. It is the responsibility of all managers
 and supervisors to ensure implementation and enforcement of this policy,
 Objectives and goals.

The following are the goals and objectives of the HSE Management System:

- To ensure and display compliance with international Codes and Standards.
- No (Zero) Lost Time Injuries, permanent disabilities and fatal accidents.

- No (Zero) Significant Property Loss.
- Exclusion of unsafe conditions/situations on the site.
- Exclusion of situations that could have a negative impact on employee's health, safety or welfare.
- Exclusion of activities that might have a negative impact on the environment.
- To preserve COMPANY and Project and Employer's image.

5. HSE Rules

In order to formulate the necessary standards to be used in the HSE policy, ten basic HSE rules are considered the foundation for such standards that have been established to achieve Project objectives.

The ten basic rules are:

- 1. The company will comply, as a minimum, with national and international laws and applicable local regulations and rules throughout its operations and activities.
- 2. These Health, Safety and Environmental Policy and Standards are to be clearly defined and made known at all levels of the Project. Responsibilities and accountabilities for the associated application are to be identified and assigned in writing.
- 3. Throughout Project's activities and operations, the risks to health, personnel, assets and environment are to be identified and the means by which they are to be minimized/avoided are to be defined.
- 4. All subcontractors must be evaluated for their ability to conform to the Project's health, safety and Environmental requirements that must be clearly stated in the contract. All contract award recommendations must address this issue.
- 5. All operations with a potentially critical effect on health, safety and environment are to be covered by procedures that are reviewed and updated on a regular basis.
- 6. Training and competency programs are to be formalized and implemented to ensure that personnel are prepared for the tasks required of them with particular attention being given to safety and environmentally critical posts.
- 7. Emergency procedures covering communications and actions in case of medical, accident and Environmental emergencies are to be maintained and tested.

- 8. All incidents and accidents, including near misses, are to be reported, analyzed and remedial actions taken to avoid re-occurrence.
- 9. All Project's operations and activities are to be assessed by inspection and audits.
- 10. Each area of operation will establish objectives and improvement plans based on incident analyses, audit results and risk analyses in order to raise the level of HSE performance.

6. HSE system administration and coordination

The emphasis on protection of project safety, health and environmental standards starts with company corporate management and extends throughout the project organization from the management team to every worker on construction site.

As noted, this requires the commitment of all members of the team to meet their own individual responsibilities toward the health, safety and welfare of the project as a whole.

The HSE Management Team and team members are indue with responsibility for the implementation of HSE management system and programs for the project as a whole and, as such, play a key role in the success of the project.

They not only have a direct hand in the daily direction of HSE matters on the project, but also have responsibility for supporting all members of the project team through the review of:

- safety features
- review of construction plans and methods
- provision of proper training and safety guides
- supply of safety tools and equipment throughout the site
- auditing of working practices
- advising on preventative measures and implementing safety improvements

In addition to this primary role in preventative action, the HSE team will act as leaders of the first line response teams in the event of accidents or incidents.

However, the principles of organization will be as follows:

6.1 Management

The Project Manager acts as the sponsor for project compliance with Project HSE Policy for the whole project. He is also a member of Contractor's corporate HSE Management

Committee and liable to them for conduct of HSE Policy on the project.

The HSE Manager for the project will be assigned at an early stage and immediately well prior to the commencement of work at site. He will report directly to the Project Manager at this initial stage and, with the support of project management, select the members of his team who will participate in initial safety reviews in Project.

6.2 Personnel

The site HSE supervisors will be assigned in sufficient numbers to ensure that fill time coverage and support is provided at every major work face. *Contractor's name* policy is to ensure that all field supervisory staff, from Construction Manager to the field foreman level, plays a proactive role in protecting the health, safety and welfare of the work force on the site. This policy ensures the maximum number of field personnel are given direct responsibly, and accountability, in the direct achievement of site health and safety goals.

The HSE Manager and his supervisors will be responsible for the necessary training, auditing and support necessary to ensure that Contractor's construction supervisory team and that of sub-contractors, can exercise this responsibility at all times. Site management shall carry out regular reviews of the HSE organization in order to confirm its suitability to fulfill the stated HSE objectives.

7. Procedures for Implementation of the Basic Rules

In order for HSE policy to be effective, the necessary HSE manual for implementation of the ten basic rules must be addressed and followed.

Gonio Ltd ensures to establish and maintain procedures to dentil', collect, update and communicate to all concerned parties and to enforce the legislative and regulatory texts applicable to its activities.

Company ensures that no activity is undertaken if the required official authorization for its execution has not been obtained.

8. Personal Protective Equipment (PPE)

Contractor's name will provide the full range of personal protective equipment and clothing to ensure the safe working of the work force. As noted, no personnel will be admitted to the working areas prior to receiving suitable PPE. This applies to visitors to the site who shall also be issued with the PPE required for their specific activity.

All gears will be "purpose approved" for the service and selected with the advice of the HSE Supervisors for the specific task BODY PROTECTION. The Contractor provides

protective clothing and equipment to all its employees engaged in work where such devices are required to protect them from injuries and health hazards.

8.1 HEAD PROTECTION

Approved safety helmets have to be used at all times when working or visiting any of the work site

8.2 EYE AND FACE PROTECTION

Protective goggles, safety glass spectacles, visors or screens of approved type shall be worn to give protection to the face and eyes against the effects of welding arcs, sparks, chipping, hydrocarbons, chemicals and injurious light rays.

8.3 HEARING PROTECTION

Earmuffs or earplugs shall be worn in areas designated as "Noise Areas" as normally more than 85 dB or whilst operating equipment with a high noise level. Such as generators, air compressors, high pressure service lines, etc.

8.4 FOOT PROTECTION

Only approved safety footwear shall be considered satisfactory for use, when working in or visiting operating areas and / or work sites. Footwear having external steel toes or heel plates or fitted with metal studs will be strictly forbidden in all areas.

8.5 HAND PROTECTION

General-purpose hand gloves provide protection against usual job hazards such as slipping, abrasion, dirt, oil, grease and moderate heat. These shall be worn at all times during the normal course of work.

Suitable heat protection gloves will be provided for welders/fitters exposed to welding, cutting flames, heating torches etc. and shall be worn at all times when tasks requiring this type of protection are performed. Gloves should not be worn while working with running rotating equipment to prevent the risk of entanglement.

8.6 SAFETY HARNESS AND LIFELINES

Safety harness with lifeline shall be worn when any work is calmed out from an exposed position and 2 meters or more above ground. Static lines will be installed for use at elevation along pipe racks and structures. All persons required working in confined spaces where there is a deficiency of oxygen or which contains toxic or noxious gases or fumes will wear a safety belt and life line in addition to the appropriate breathing apparatus

9. Communication and emergency management

A system is to be set up to ensure that personnel, including subcontractors employees, are kept regularly informed regarding HSE matters, can discuss or acquire information relevant to current issues relating to HSE, and that questions raised will receive appropriate action.

In case of several languages used on the construction site, language problems shall be identified and measures taken to avoid any risk of misunderstanding. Clarity of communication is to be addressed regularly.

In event of a major accident. Project Manager in co-operation with site management shall be prepared for communication with local communities, public authorities, the press, families of concerned parties and partners. In this respect, an Emergency Management Team consisting of representatives designated by employer's representative shall be organized.

The authority and responsibilities of these representatives shall he specified in writing.

10. Risk Evaluation

10.1 General statement

Contractor's name accepts that some of its operations may, unless properly controlled, create risks to members of its staff, and others, and will take all reasonably practicable measures to reduce these risks to an acceptable level. Contractor will take all reasonable steps to ensure that risks assessments are carried out which will detail the range of hazards associated with working operations together with any necessary remedial actions.

Any employee who discovers a hazard during working operations should report the hazard to management so that the necessary remedial and protective action can be taken.

- Management and supervisory staff are required to carry out risk assessments of work activities which pose a significant risk to health and safety, in order to ensure hazards are eliminated or reduced by implementing appropriate control measures and safe systems of work.
- Risk assessments will identify the range of hazards associated with the work activities, together with any
- necessary remedial action.
- The findings of risk assessments will be recorded and, where necessary, will be used to develop method
- statements to ensure safe systems of work.
- A copy of the risk assessment report will be available at the workplace, and the

findings will be brought to the

- attention of all employees.
- All risk assessments will be monitored and reviewed at regular intervals, normally annually, or when working
- practices or equipment change, to confirm that all risk assessments are adequately controlled and are in compliance with legislation.

10.2 Procedures for dealing with HSE Issues

The current system for discussing Health and Safety issues with employees is via HSE team. The employee safety coordinators provide an avenue which any concerns raised by employees, emanating from the risk assessments, can he brought to the attention of senior management for more formal discussion. *Contractor's name* Engineering will delegate the HSE manager as the manager with special responsibility for the implementation and operation of the risk assessment process.

HSE manager provides the management with the necessary knowledge, information and resources to ensure the proper operation of this process.

10.3 Control and Monitoring

The purpose of the risk assessment is to formulate a system of control for hazards associated with daily working environment and working practices. To achieve this a proper system for the formulation of remedial actions to cater for the hazards identified has been developed. The HSE team discusses all items of concern arising from the completed risk assessment procedure.

The assessment team leader will detail members of the team to be responsible for monitoring implementation of the recommended controls, assessing the efficiency of the controls and making any additional recommendations.

10.4 Electricity

- Ensure that electrical installations and equipment are installed in accordance with the State regulations and codes.
- Engineers (IEE) Wiring Regulations and are safe for use and free from defect.
- Only 240/380 V equipment (or less) will be used on site.
- Maintain all electrical fixed installations in a safe condition by carrying out routine safety testing.
- Inspect and test portable and transportable equipment as frequently as required (the frequency will depend on the
- Environment in which the equipment is used and the conditions of usage, i.e., how carefully it is handled).
- Records of inspection and testing will be maintained.
- Only authorized persons are permitted to repair or alter electrical equipment.

10.5 Fire Prevention and Evacuation Procedures

- Contractor's name fire risk assessment in accordance with State regulations and codes
- Appropriate measures will be implemented at all workplaces, including adequate:
 - a. Means of fire detection.
 - b. Raising the alarm in the event of a fire.
 - c. Fire fighting equipment.
 - d. Installation of emergency lighting(if necessary).
- Appropriate measures will be implemented for regular maintenance, servicing and testing of fire prevention equipment.
- Procedures will be produced at all workplaces detailing action to be taken in the event of a fire, including on discovering a fire, hearing a fire alarm, evacuation routes and assembly points.
- An appointed person will regularly inspect the designated evacuation routes for obstructions.
- Where disabled persons use the workplace, specific arrangements will be made to ensure they can escape in an emergency.
- All employees will be informed, instructed and where necessary, trained in fire
 prevention and evacuation procedures (action to be taken, fire alarm, types and
 use of fire equipment). These procedures will be practiced regularly and records
 will be maintained.

10.6 Hazardous Substances

- Products, materials or substances considered as hazardous by local regulations or the international standards of reference, must be identified with an indication of where they are stored and in what quantities. For each hazardous product, a safety data sheet shall be available on-site.
- Dangerous waste are to be segregated, stored safely and taken off-site using approved methods and properly qualified service companies. Procedures shall be in place to cover:
 - Waste collection/ segregation
 - Waste storage
 - Waste removal and handling
 - Information and documentation of Hazards the course the label, as "Safety Inducted" will be stamped on the gate pass card and in addition one HSE induction card will be issued

10.7 Noise

 Where practicable, noise levels will be maintained below the lower exposure action value of 80 dB (A).

- All employees, contractors and visitors will obey any instructions and warning notices with regard to wearing of hearing protection in designated areas.
- Ensure plant and equipment is selected and maintained to minimize noise levels and employees have been instructed in their use.
- Ensure suitable ear protection is supplied for the conditions of exposure.
- Ensure adequate means of communication in noisy environments, especially if relevant alarm sounds may need to be heard.
- Workplace management and supervisors will ensure compliance with any noise levels and periods of permitted noise activities laid down by local authorities, in order to prevent noise pollution and complaints

10.8 Alcohols and Drug Prohibition, Smoking Restriction

- No alcoholic beverages or illegal drugs are permitted on worksite. Contractor's name Engineering will ensure that Personnel is aware of and fully comply with this prohibition:
- No smoking takes place in the non-smoking areas.
- Safety at work is not jeopardized by any kind of narcotics and drugs, which may include some medical drugs, affecting the sense of view, balance or awareness.

10.9 Identification and inspection of equipment

- Equipment critical to HSE performance is to be identified.
- For identified critical equipment, an inspection schedule defining the method and frequency of inspections and tests and the measures to be taken to ensure that an item of equipment is not used unless its compliance with specified requirements.
- Collective actions are to be taken regarding all non-conformities detected during inspection.
- In order to reduce the risk of failure of critical equipment, a preventive maintenance program shall be developed, implemented and periodically reviewed to ensure its compliance with current requirements.

11. Environmental Management

Contractor's name will develop detailed procedures covering the handling, treatment and disposal of liquid and solid wastes generated in the course of the Project.

To implement the Environmental Management System into the Project site, the

following items shall be inspected continuously.

- Hazardous Chemical and Waste Material collection/storage/disposal areas.
- Oil and Chemical Spillage.
- Solid Waste Materials (rubbish, garbage, etc...) generated from the Camps and Site areas.
- Dust control on the unpaved roads.
- Housekeeping around all Site areas.
- Wastewater Treatment.

Incidents and corrective actions

All incidents and accidents are to be reported, analyzed and remedial action taken to avoid re-occurrence.

- Contractor establishes a procedure for incident (accident or near miss) and anomaly
 processing. This procedure is to cover reporting, analysis of the causes, evaluation
 of potential damage and implementation of remedial actions.
- All incidents are to be reported formally to site management. For serious accidents, transmittal of this information shall be immediate. A comprehensive report shall be issued.
- Incidents with obvious lessons for other departments of Project are to be reported in such a way as to allow feedback across the Project organization.

12. Audits and inspections

12.1 Audits

- Audits of the HSE system are to be organized on a regular basis in order to check that procedures are applied, comply with the requirements of the present document and are suitable for achieving objectives.
- A schedule of audits stipulating the activity to be audited, those responsible for the audit and the reference documents to be used is established.
- A report indicating any observed nonconformity shall be issued for each audit. This

report is to be delivered to the head of the audited activity that proposes and implements the corresponding corrective actions.

12.2 Planned Checks

Planned general checks are to be organized regularly in all sectors of the activity. Corrective actions are to be applied to any nonconformity detected.

13. Health and Hygiene

Contractor's name will provide and maintain the facilities and services necessary to deliver First Aid medical treatment for its site personnel.

This service will provide for both the minor first aid needs, which can readily and properly be taken care of on site and for the immediate emergency aid required for those injured or seriously ill requiring more extensive care and/or treatment at outside facilities. *Contractor's name* will maintain adequate hygiene levels due to consideration to the local climate, and in particular for:

- 1 Potable water to be provided in sufficient quantities and meeting Health Organization specified quality.
- 2 Food storage and processing
- 3 Sanitary services
- 4 Adequate camp and accommodation facilities conditions

The HSE Committee shall have the responsibility to collect information relative to the incidents; set priorities according to the risks incurred and monitor corrective actions that are integrated into the HSE improvement plan.

HSE Manager

MR.

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