

Authors: Felix N. Nlerum Ifeanyichukwu Edeh	MAYAK SERVICES LIMITED HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM	Ref: HSE MSL-002
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Quality, Health, Safety, and Environmental (HSE) Policy

At MAYAK SERVICES LIMITED we seek to remain a proactive, solution-oriented and efficiently private-run enterprise relying on a team of highly proficient and dedicated staff using appropriate technology and reliable infrastructure, in a motivating and friendly work environment.

The long-term business success of MAYAK SERVICES LIMITED depends on our ability to continually improve the quality of our products and services delivery while protecting people and the environment. This commitment is in the best interests of our customers, our employees and those in the communities in which we work and live.

We are committed to the proactive integration of HSE objectives into our management system at all levels, actively reinforced by reward programs that recognize outstanding HSE performance demonstrated by our employees and contractors.

The commitments in this Policy shall be reviewed to ensure on-going suitability and are in addition to our basic obligation to comply with MAYAK SERVICES LIMITED standards, as well as all applicable laws and regulations where we operate. This is critical to our business success because it reduces risk and adds value to our products and services.

Vision

Our Vision is to be the reference point in LPG marketing.

- Define and respond to customer expectations
- Adapt to changing and expanding business conditions and market opportunities
- Differentiate our service capability from the competition
- Be a recognized industry (Bulk LPG Operations) leader in HSE.

Mission

To be a proactive solution oriented company, relying on a team of highly dedicated professionals, using appropriate technology and reliable infrastructure in a motivating and friendly work environment to satisfy the needs of customers and create sustainable value for other stakeholders.

Culture

HSE, a line management responsibility, requires visible commitment, leadership and involvement. Our proactive HSE culture shall be understood, shared and practiced by all employees as an integral part of everyday business.

Fundamental to this culture is our belief that all losses of people, property and process result from management failure and are preventable.

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Strategy

We will strive for a zero defect culture:

- No accidents
- No loss to process
- No harmful emissions
- No health-related incidents
- No lapses in security

This zero defect culture shall be attained through:

- Visible commitment, leadership and involvement of line management tied to incentive objectives
- Standards of mandatory HSE training for all personnel
- HSE training provided through state-of-the-art learning techniques
- Maximized efficiency and synergy through sharing of resources
- HSE integration in all product development
- Proactive participation in global industry initiatives and recognition by our customers that we are a leader in HSE
- Creation of a HSE career ladder.

HSE Management System (HSEMS)

The “MAYAK SERVICES LIMITED” HSE Management System defines the principles by which we conduct our operations Nation-wide with regard to the quality of our services and products; the health and safety of our customers, employees, contractors and communities where we work; and protection of the environment.

This HSE philosophy shall be communicated to all employees, customers, contractors and third parties associated with our business, and each LPG FILLING PLANT Services product group must provide positive evidence of conformance to this Management System.

The HSE Management System model comprises eight interrelated components:

1 Commitment and Leadership

Management shall provide strong, visible commitment, leadership and personal involvement in HSE. Management shall make available the resources necessary to achieve our HSE objectives

2 Policies and Objectives

Policies and strategic objectives shall be defined, deployed and maintained at all organizational levels

3 Organization and Resources

Organizational responsibilities shall be defined and the necessary resources provided to achieve HSE objectives

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4 Contractor and Supplier Management

Suppliers and contractors shall be managed to ensure that their products and services meet applicable HSE standards

5 Risk Management

“MAYAK SERVICES LIMITED” shall continually evaluate the HSE risks to our workforce, customers and the environment. Comprehensive risk assessment provides the necessary information to reduce these risks and mitigate the impact of our operations on health, safety and the environment

6 Design and Planning

HSE shall be integral to the design, development and delivery of “MAYAK SERVICES LIMITED” products and services.

7 Implementation and Monitoring

To ensure that objectives are met, activities shall be conducted in accordance with defined standards, and continuous improvement shall be promoted and monitored through active employee participation.

8 Assessments and Continuous Improvement.

Audits and reviews shall be conducted to verify the implementation and effectiveness of the HSE Management System.

These are continuously improved by conformance checks:

- On day-to-day standards and procedures (controls)
- On the management system (correction)
- And through modifications to the management system (improvement).

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1 Structure of the “MAYAK SERVICES LIMITED HSE Manual.

The “MAYAK SERVICES LIMITED Health, Safety and Environment Manual has been issued to guide managers and front-line supervisors to better preserve people, property and the environment. This manual herein becomes MAYAK SERVICES LIMITED HSE Manual Volume 1.

This document factors in comments and suggestions, analysis of historical loss data, from other LPG FILLING PLANT from within and outside the country.

The Manual is comprised of the following sections:

Section 1	<u>Commitment and Leadership</u>
Section 2	<u>Policies and Objectives</u>
Section 3	<u>Organization and Resources</u>
Section 4	<u>Contractor and Supplier Management</u>
Section 5	<u>Risk Management</u>
Section 6	<u>Design and planning</u>
Section 7	<u>Implementation and Monitoring</u>
Section 8	<u>Assessment and Continuous Improvement</u>

The policies are in bold type and bordered with a box.

A policy is a rule that shall be strictly applied by all personnel within the area of application.

The procedures are listed below each policy. They describe the scope of each policy.

At the end of each policy and procedure section, the following references may be found:

Recommended Control Mechanism: refers to the physical evidence (documented or otherwise) that confirms the policy is in place.

Annexed Document: refers to additional information corresponding to the policy.

2 Management of the “MAYAK SERVICES LIMITED HSE Manual

2.1 Distribution of the HSE Manual

The HSE Manual is a controlled document. Each controlled manual is numbered and is to be distributed to every personnel at “MAYAK SERVICES LIMITED.

2.2 Acknowledgement of receipt of the HSE Manual

Once received, each personnel shall complete the *Acknowledgement of Receipt* and return it to HSE Manager at the PLANT.

2.3 Control of HSE Manual Revisions

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- 2.3.1 Each revision shall be recorded in the *Revision History* page by replacing the existing page with a new page (transmitted with the revision) indicating the revision number, date, and description.
- 2.3.2 When a revision is made by “MAYAK SERVICES LIMITED, a notification will be made by e-mail to “MAYAK SERVICES LIMITED cooperate Office in RIVERS STATE by the GENERAL MANAGER.
- 2.3.3 The relevant HSE Manual revision hard copies and the updated revision history page will be sent to the Managing Director, who will acknowledge reception.
- 2.3.4 The GENERAL MANAGER is responsible for distributing the revision in the LPG FILLING PLANT and their control using a controlled process.

2.4 Source Document

The latest version of the “MAYAK SERVICES LIMITED HSE Manual will always be posted and available at the “MAYAK SERVICES LIMITED PORT HARCOURT.

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Subject: Section 1 Commitment and Leadership

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Section 1 Commitment and Leadership

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1.1.2 HSE MS Self-assessment questionnaire

1.1.3 MS assessment guidelines

1.1.4 “MAYAK SERVICES LIMITED Commitment

1.2 Leadership

1.2.1 Policies, standards and procedures

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Subject: Section 1: Commitment and Leadership

1.1 Commitment

Management shall demonstrate visible commitment to HSE and provide the necessary resources to develop and maintain an active HSE Management system throughout the LPG Filling Plant Facility.

1.1.1 HSE Management is:

- An effort to prevent accidents and minimize losses.
- An integral part of our business, and is of equal importance to service quality, motivation and profitability.

There is a permanent interaction between HSE performance, operations efficiency, personnel motivation, morale and financial success.

- A line management responsibility. The HSE Department has a specialized function by assisting the line management to adequately address HSE issues.

To manage HSE adequately the line manager has to be supported by:

- The Company Personnel,
- The Technical Support Department,
- The Client, the Vendors, the Agencies and the Community,
- The “MAYAK SERVICES LIMITED Company policies and procedures.

Management by objectives principles apply to HSE: target objectives are set and HSE plans developed.

These HSE plans are the mechanism used to achieve the objectives.

1.1.2 HSE MS Self-Assessment Questionnaire

A document which contains guidelines for assessing commitment and leadership with respect to the “MAYAK SERVICES LIMITED HSE Management System. It provides a list of questions with a score for each one to deliver an overall score.

1.1.2.1 Managers and Supervisors shall regularly perform a HSE MS self-assessment questionnaire to set up a personal HSE improvement plan.

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1.1.3 Management System Assessment Guidelines

A management guide to assessing the HSE management system and developing a HSE improvement plan.

Ref. Document : HSE Management System Guide.

1.1.4 “MAYAK SERVICES LIMITED Commitment/Mission Statement

“MAYAK SERVICES LIMITED is totally committed to Quality, Health, Safety and Environment (HSE) performance and in particular to reduce the “MAYAK SERVICES LIMITED lost time injury rate. We will achieve this objective, through the personal commitment of everyone, the way we behave and work together and through our conformance to the LPG FILLING PLANT (“MAYAK SERVICES LIMITED) HSE Management System applied consistently throughout the LPG FILLING PLANT.

The fundamental principles under which we perform our activities are:

- HSE is a line management responsibility.
- Working safely and protecting the environment is a condition of employment
- No employee shall commit, condone nor knowingly be party to an unsafe act or violation of the company’s HSE policies or Federal Laws.

We shall support fully every employee’s right to refuse to carry out an activity that can justifiably be considered unsafe.

- Training in HSE shall be provided to all employees.
- Line managers shall ensure that risks to people, assets, the environment and Company reputation are reduced, through the application of hazard identification and risk assessment tools.
- HSE policies shall be communicated to all employees, to clients, to suppliers, to contractors and to third parties with whom MAYAK SERVICES LIMITED is associated.
- Clients, suppliers, contractors and third-party personnel working on “MAYAK SERVICES LIMITED facilities are required to comply with “MAYAK SERVICES LIMITED HSE policies, procedures and standards, as well as the policies of their respective companies.
- We shall help employees care for their health.
- Medical support provided includes regular publications on health, vaccinations, physical check-ups, medical evacuation and health audits.
- Our commitment to quality is focused on satisfying both the standards specified and the expectations of our clients. The LPG FILLING PLANT shall monitor performance against corporate and local benchmarks.
- We shall maintain a total quality culture throughout the LPG FILLING PLANT, thereby providing opportunities for all employees to contribute towards the

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development of the company.

1.2 Leadership

Managers shall provide strong, visible leadership and actively participate in the continuing drive toward a corporate culture that places HSE equal in importance to the other critical business objectives. Visible leadership includes setting a personal example in everyday work and actively contributing to HSE activities such as audits, site visits, etc. Managers are responsible for maintaining a culture of HSE awareness so that prevention of accidental risk and loss to process is a recognized and integral part of our daily activities. Managers shall also encourage the involvement of all employees and empower them to develop and implement solutions pertinent to HSE issues at their site.

1.2.1 Policies, standards and Procedures

1.2.1.1 The HSE manual, the Maintenance manuals, the Job Description manual shall be available at LPG FILLING PLANT site.

1.2.1.2 The policies, standards and procedures shall be complied with on Site. Should one of them be inapplicable, then a request for exemption shall be applied for.

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2 Policies and Objectives

2.1 Policies

Managers are responsible for defining and implementing HSE policies that meet applicable internal and external requirements

2.1.1 Policies:

- HSE
- Driving
- Crisis Management
- Employee Security
- Information Security
- Substance Abuse

2.1.2 Conflict

2.1.2.1 Wherever and whenever “MAYAK SERVICES LIMITED HSE policies, standards and procedures differ from the applicable regulations in the area of operations, the most stringent of such requirements shall apply.

2.2 Objectives

Managers shall identify and set HSE performance targets. These targets shall be communicated to our customers, employees and contractors, and employees and contractors shall be informed about what is required of them to achieve these targets. Programs shall be in place to assess HSE performance against the set objectives

2.2.1 HSE objectives are set with the intention to continuously improve performance.

As a general rule, the HSE objectives shall be :

- Based on data,

This Health, Safety and Environmental Policy Manual demonstrates Mayak Services Limited commitment to continually protect the Health and Safety of her Staff/Contractors/Clients/ and Environment where they do business and proudly issue this document in this respect. – March, 2023 |

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- Measurable,
- Achievable and realistic,
- And reviewed regularly.

They can be related to:

- Injury frequency and severity rates,
- Occupational illness cases,
- Automotive accident rates,
- Damages to property,
- Damages to environment,
- Total remedial costs,
- Substandard acts and conditions,
- Others.

2.2.2 Companywide objectives are set yearly by the corporate management.

2.2.3 GENERAL MANAGERS are requested to adopt such objectives and to define their own plans to achieve them.

2.2.4 Results shall be monitored, reviewed and consolidated on a monthly basis at LPG FILLING PLANT level.

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3 Organization and Resources

3.1 Organizational Responsibilities

Line managers are responsible for HSE. All employees are individually responsible and accountable for all HSE issues relating to themselves or others with whom they associate. Line managers shall ensure that all employees have job descriptions and objectives set which match actual responsibilities and that these descriptions are clearly communicated

3.1.1 GENERAL MANAGER

On LPG FILLING PLANT, the GENERAL MANAGER is responsible for ensuring compliance with the HSE policies, standards and procedures.

3.1.1.1 The GENERAL MANAGER of LPG FILLING PLANT shall be the “MAYAK SERVICES LIMITED Superintendent (present on the LPG FILLING PLANT).

3.1.2 Authority of the GENERAL MANAGER

3.1.2.1 The GENERAL MANAGER of any LPG FILLING PLANT shall be one, and only one person. This critical responsibility cannot be shared with anyone, whatever the circumstances and/or the operations of the LPG FILLING PLANT.

3.1.2.2 The GENERAL MANAGER shall be in complete and ultimate command of the LPG FILLING PLANT. The GENERAL MANAGER’s actions shall be governed by the policies, standards and procedures of “MAYAK SERVICES LIMITED and “MAYAK SERVICES LIMITED.

3.1.2.3 The GENERAL MANAGER has the overriding authority and the responsibility to make decisions with respect to safety and pollution/spill prevention and to request the company’s assistance as may be necessary.

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3.1.3 Delegation by the GENERAL MANAGER

3.1.3.1 The GENERAL MANAGER is not necessarily an expert in every aspect of the installation and its operations. The GENERAL MANAGER commands the assistance of specialist technicians and can delegate tasks to the specialist functions. However, the GENERAL MANAGER shall remain in ultimate command at all times.

3.1.4 Review of HSE manual by HSE Department/GENERAL MANAGER

3.1.4.1 “The GENERAL MANAGER shall periodically review the elements of “MAYAK SERVICES LIMITED Safety Management System, and reports its deficiencies, if found, to the company’s management.”

3.2 Organizational Structure

A HSE organization shall be in place as required to support management’s HSE role and responsibilities

3.2.1. Organization chart

There shall be an organization chart posted on all BULK LPG FILLING PLANT, offices and Headquarters.

3.2.2 Loss Prevention Team / LPT

There shall be a LPT on all BULK LPG FILLING PLANT.

3.2.2.1 The LPT shall participate in:

- Investigation and review of all accidents including personnel injuries, occupational illness, damages to equipment and/or environment, as well as potential accidents.
- Spill response/contingency plan
- Review employee’s recommendations taken from the safety suggestions box.

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- Making recommendations to the management to prevent recurrence of accidents. - Carrying out inspections at worksite. - Keeping the employees informed on HSE actions and progress. - Developing HSE plans and monitoring progress. 3.2.2.2 The following minimum composition is recommended: At LPG FILLING PLANT level GENERAL MANAGER Department heads: Plant engineer Employee’s representative(s) Safety officer/Training instructor if any 3.2.2.3 A LPT meeting shall be held once every month. 3.2.2.4 The Chairperson shall rotate at every meeting and shall be designated in advance for the next meeting. 3.2.2.5 The meeting shall start by reviewing the minutes of the last meeting and giving an update of the actions undertaken. 3.2.2.6 There shall be a designated person responsible to administer the minutes of the meeting. The minutes shall show the names of the participants, the summary of the discussion, and the lines of actions decided, with deadlines. The minutes shall state the proposed date for the next meeting, and shall be endorsed by two persons attending the meeting. 3.2.2.7 The minutes of the meeting shall be posted on local HSE bulletin board. <i>Recommended Control Mechanism: LPT Report binder</i>		

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3.3 Training and Competences

Recruiting and training programs shall be implemented to ensure that all employees are competent to meet their responsibilities. The competence requirements of all positions shall be regularly assessed and updated as necessary. Recruiting Systems shall be in place to identify and recruit suitable candidates.

3.3.1 Employee Certification

On-the-job and formal training shall be provided to fulfil the competence requirements of all job functions. All training programs shall be periodically assessed for quality and effectiveness, and the latest technology shall be employed to ensure that these training programs remain best in class.

3.3.1.1. The management shall ensure that each unit is manned with qualified, certified, and medically fit personnel in accordance with national and international requirements”.

3.3.2 Training Requirements

Each employee shall pursue certification in their function as per Company training matrix requirements.

Each supervisor or line manager is responsible for their subordinate’s certification.
Recommended Control Mechanism: Training Record System

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3.3.3 Safety Induction Briefing for newly hired employees

Each newly hired employee shall be given a Safety Induction Briefing prior to proceeding to the LPG FILLING PLANT or work place in order to safely carry out duties.

3.3.3.1 All newly hired personnel shall receive general and job-specific orientations in HSE prior to their first work assignment.

3.3.3.2 Employees transferring to new positions or locations shall receive formal orientation about specific HSE issues related to their new environment.

3.3.3.3 Prior to the employee proceeding to the LPG FILLING PLANT or work place the Operations line management will delegate or administer the Safety Induction Briefing.

3.3.3.4 The Safety Induction Briefing will cover as a minimum the following topics:

- Corporate Statement of Policy
- Chain of command: LPG FILLING PLANT organization chart
- Introduction to the HSE manual
- Introduction to HSE systems applicable to the new hire position

3.3.3.5 During the safety induction briefing, a HSE handbook listing the Company Policies and Procedures will be given to the new employee, with receipt of acknowledgment, and instruction to read and follow the Company policies.

3.3.3.6 The safety induction briefing should normally be done in one day.

3.3.2.7 At the end of the briefing, the new employee will be tested to ensure adequate knowledge has been acquired. A grade obtained less than 70 % indicates an insufficient understanding of the basic principles. GENERAL MANAGER shall be aware, further clarification shall be given to the employee and new hire retested after a week.

Recommended Control Mechanism: New Hire Induction Test

3.4 Information Management

Effective communications processes shall be in place to ensure free circulation of information throughout the organization. Effective two-way communications shall also be

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maintained with customers, contractors, relevant government agencies and third parties. Active participation in professional organizations shall be encouraged and maintained

Reporting is required to:

- Communicate the information through line management, for analysis and action,
- Circulate the information of a general interest and nature within “MAYAK SERVICES LIMITED and its personnel.
- Monitor the implementation of actions,
- Increase the level of HSE expertise throughout “MAYAK SERVICES LIMITED.

3.4.1 HSE Meetings

All Company personnel working on LPG FILLING PLANT shall participate in a HSE meeting at least once a week. Third party personnel and Client shall be invited to the HSE meetings.

3.4.1.1 The HSE meetings shall be held for the purpose of:

- Discussing/explaining/reviewing the HSE policies, standards and procedures,
- Reviewing an accident or a potential accident,
- Bringing up a new Health, Safety or Environment issue.

3.4.1.2 The HSE Manager and other Managers are responsible for ensuring that HSE meetings are held.

3.4.1.3 Each meeting shall be chaired on a rotating basis by LPG FILLING PLANT personnel.

3.4.1.4 Each meeting shall be documented on a “MAYAK SERVICES LIMITED” HSE meeting report form.

3.4.1.5 A nominated person shall be responsible for taking the minutes of the HSE meeting.

3.4.1.6 The list of personnel attending the meeting shall be shown on the HSE meeting report form.

3.4.1.7 A copy of the meeting report shall be posted and kept on the LPG FILLING PLANT.

3.4.1.8 The list below suggests topics that can be discussed during HSE meetings:

- Recent accidents, potential accidents to personnel, potential spill situation, equipment and/or environment, that may be of interest to the LPG FILLING PLANT personnel,

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- HSE plan progression,
- Hazards not corrected,
- Sub-standard practices observed by the LPG FILLING PLANT personnel,
- HSE news video,
- Review of a particular policy, standard and/or procedure
- Communication of HSE alerts concerning the LPG FILLING PLANT personnel,
- Introduction of new arrivals to the LPG FILLING PLANT personnel,
- Practical demonstration of equipment, such as fire fighting equipment, SCBA's, manual lifting, CPR training, etc...

Recommended Control Mechanism: HSE Meeting Report

3.4.2 Toolbox (pre-job) meeting

Prior to starting any non-routine job, a toolbox (pre-job) meeting shall be held by the Supervisor in charge to acquaint each person involved in the operation with the scope of work, the hazards and the specific procedures to be followed.

3.4.2.1 The toolbox meeting shall be short and concise, and held preferably on the site where the work is to be performed.

3.4.2.2 All persons involved in the operation shall attend the meeting and have input to the discussion.

3.4.2.3 A toolbox meeting should also be held if the Supervisor feels the LPG FILLING PLANT personnel is not experienced enough for a certain task, when the operations deviate from plan, upon request of personnel, or when a work permit has to be issued.

Annexed Document: Sample of Pre-Job Meeting Cards

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3.4.4 Newcomers/Visitors

All new comers shall report immediately to the GENERAL MANAGER or his designate representative to be briefed on HSE policies, emergency procedures and BULK LPG FILLING PLANT orientation.

3.4.4.1 Newcomers are considered to be all personnel arriving at the LPG FILLING PLANT site for the first time.

3.4.4.2 The LPG FILLING PLANT shall have a system in place ensuring that all newcomers report immediately to the GENERAL MANAGER or his designate.

3.4.4.3 The newcomers shall be immediately instructed on the layout of the LPG FILLING PLANT, the location of mustering stations, the different types of alarms, emergency procedures and station bills.

3.4.4.4 The newcomers shall be issued a safety information card or leaflet specific to the LPG FILLING PLANT. The “MAYAK SERVICES LIMITED” HSE handbook will be made available.

3.4.4.5 A LPG FILLING PLANT orientation by the direct supervisor shall be conducted to familiarize him/her with the high risk areas, no-smoking areas, working areas and conditions, and to review with him/her Company HSE rules applicable to his function.

3.4.4.7 A tutor shall be designated from the regular crew members to assist the “MAYAK SERVICES LIMITED” newcomer in working safely during his first one month.

3.4.4.8 The GENERAL MANAGER or his designate will inform the relevant supervisors of all newcomers.

3.4.4.9 The Safety Manager is responsible for ensuring that each new employee is provided with adequate PPE prior to work commencement at the LPG FILLING PLANT.

3.4.5 Validity

3.4.5.1 Processes shall be in place to ensure that information is valid and current.

3.4.6 Bridging documents

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3.4.6.1 HSE bridging documents shall be established as necessary to ensure a coherent approach between all operating parties, including client and contractors.

3.4.7 Information security

3.4.7.1 Systems and controls shall be in place to ensure the security and confidentiality of all proprietary and customer information

3.4.8 HSE Newsletter

The “MAYAK SERVICES LIMITED” HSE Manager shall issue a HSE newsletter on a 3 monthly basis. The HSE newsletter aims at updating Company personnel on HSE statistics, sharing lessons learned from accidents, through detailed accident investigations, informing about new HSE techniques and equipment, advertising new HSE approaches successfully implemented on specific LPG FILLING PLANT.

3.5 Standards

Standards shall be defined for all HSE activities and for all business activities which present a significant risk to our personnel. Equipment and product specifications shall systematically incorporate HSE requirements into all stages of design and development. Management shall ensure that these standards and specifications are maintained at all times.

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“MAYAK SERVICES LIMITED” HSE Standards

- Std 01: Journey Management and Driving
- Std 02: HSE Reporting
- Std 03: Personal Protective Equipment
- Std 04: Emergency Response
- Std 05: Health
- Std 06: Management System Audit
- Std 07: Loss Prevention Team (LPT)
- Std 08: Exemption
- Std 09: Personal Security
- Std 10: Contractor and Supplier Management
- Std 11: Mechanical Lifting
- Std 12: Pressure
- Std 13: Fire Prevention and Mitigation
- Std 14: Injury Prevention

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Subject: Section 4 Contractor and Supplier Management

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 - 4.1.1 Risk assessment
 - 4.1.2 HSE requirements
- 4.2 Management
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4 Contractor and Supplier Management

Suppliers and contractors shall be managed to ensure that their products and services meet applicable HSE standards

4.1 Evaluation, Qualification and Selection

4.1.1 Risk Assessment

All suppliers and contractors shall be evaluated, qualified and selected based on their ability to deliver a quality product or service in a safe, healthy and environmentally acceptable manner

The level of risk assessed for the proposed work should be the prime factor in selecting a contracting strategy and in determining which measures are most appropriate for consideration by the Service provider to prevent incidents from occurring and to minimise the consequences of an event should it occur.

4.1.2 HSE Requirements

HSE requirements shall be detailed in contracts standards

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4.2 Management

4.2.1 Contractors management.

Suppliers and contractors shall be managed to ensure that their HSE performance conforms to contractual requirements.

To this end, a system shall be in place to encourage effective communications between "MAYAK SERVICES LIMITED" and its suppliers and contractors/service provider.

4.2.2 Line Management responsibilities, line management shall ensure that:

4.2.2.1 A risk assessment is carried out for each service provided.

4.2.2.2 Service Providers are pre-qualified.

4.2.2.3 Service Providers are approved through a tender process.

4.2.2.4 Service Providers are managed through the mobilisation phase.

4.2.2.5 Service Providers' work under a contract with "MAYAK SERVICES LIMITED" that contains HSE terms and conditions pertinent to the assessed risk.

4.2.2.6 Service Providers are actively managed against contract terms and conditions.

4.2.2.7 De-mobilization risks are assessed and addressed through formal meetings with the Service provider.

4.2.2.8 Formal closeout takes place at the end of the contract term.

4.2.3 Contractors HSE activities.

4.2.3.1 Contractors shall participate on all LPG FILLING PLANT HSE activities (safety meeting, Leak Response Drill, pre-job meeting, permit to work, HSE training, risk identification etc).

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4.2.4 A list of relevant approved contractors shall be available on each site.

4.3 Contractor Performance

4.3.1 Mechanisms for monitoring contractor HSE performance shall be implemented.

4.3.2 Good HSE performance shall be expected and recognized and Contractors shall be actively involved in the continuous improvement process.

4.3.3 Excellent practices identified shall be promoted.

4.3.4 Poor HSE performance shall not be tolerated and may result in early termination.

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Subject: Section 5 Risk Management

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5 Risk Management

"MAYAK SERVICES LIMITED", shall continually evaluate the HSE risks to her workforce, customers and the environment. Comprehensive risk assessment provides the necessary information to reduce these risks and mitigate the impact of our operations on health, safety and the environment.

5.1 Definitions

5.1.1 HSE definitions shall be used and understood throughout the organization.

LPG FILLING PLANT

LPG FILLING PLANT here refers to any LPG Product Storage/Loading PLANT operated by "MAYAK SERVICES LIMITED".

Qualified Personnel

Any person in possession of a valid certificate of proficiency covering the activity being carried out.

Certified Personnel

Any person complying 100% with "MAYAK SERVICES LIMITED LPG FILLING PLANT" training requirements.

Approved Personnel / Competent Person

Any person appointed in writing by the GENERAL MANAGER (or higher authority) to carry out a specific task.

"MAYAK SERVICES LIMITED Employee

Any regular or part-time "MAYAK SERVICES LIMITED employee, consultant, temporary hire, or contractor.

"MAYAK SERVICES LIMITED" Vehicle

Any vehicle owned, leased, rented or contracted by "MAYAK SERVICES LIMITED", and additionally any vehicle for which a regular transportation allowance or mileage reimbursement is being received.

Other vehicles such as forklifts, wheel-loaders and mobile cranes which are operated by Company personnel do not count for vehicle mileage or as a vehicle accident and should be

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counted as an equipment accident

Accident

An undesired event which results in:

- harm to people (injury or occupational illness) and/or
- damage to vehicles and/or
- damage to the environment and/or
- losses to assets such as information, process, and reputation

Near Accident

An undesired event which, under slightly different circumstances, had the potential to cause an Accident as defined above.

Incident

An Accident or a Near Accident. (All Incidents are reportable.)

Process Specific Incident

Any incident that occurs on the execution of a Segment's processes or in the use of a Segment's specific equipment (e.g., Leak, Pressure, explosives, high voltage, fire etc.), including product and service quality failures.

Automotive Accident (AA)

Any driving related accident involving a "MAYAK SERVICES LIMITED" Vehicle that results in vehicle damage and/or injury. The severity is defined by the total loss to all vehicles involved in the accident. If an accident involves a rollover of any vehicle, the minimum Severity classification shall be Serious.

Hazard

Any object, physical condition, or physical effect that has the potential to cause an Incident.

Hazardous situation

Any situation where a Hazard is present and/or an Unsafe Act is being conducted.

Suggestion for Improvement

Any meaningful recommendation for improving any aspect of "MAYAK SERVICES LIMITED" operations.

HSE Improvement Kit

The standard "MAYAK SERVICES LIMITED" "quick and easy" paper system for reporting Recognition, Suggestions, Hazardous Situations and Near Accidents.

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Risk

In the context of HSE, risk is defined as a measure of the probability (Exposure) for an Incident to happen and of the potential severity of the consequences (Potential).

“MAYAK SERVICES LIMITED” Involved Accident

Any accident:

- Happening at a place of work
- Involving an “MAYAK SERVICES LIMITED” Vehicle irrespective of the circumstances
- Involving any private vehicle on “MAYAK SERVICES LIMITED” business
- During transport from one’s home to one’s regular work place, irrespective of who owns the means of transport
- Involving any Client or contractor/vendor-related activity (professional or social)

“MAYAK SERVICES LIMITED” Non-Involved Accident

Any accident happening:

- During vacation or days-off
- As a result of a self-inflicted injury such as suicide, drug overdose, etc
- As a result of a health condition not clearly caused by work

Industry Recognized Accident

All accidents listed above under ““MAYAK SERVICES LIMITED” Involved Accidents” except any accidents involving:

- Travel to and from one’s home and a regular Assembly Point
- Travel to and from one’s home and a regular work place
- Personal travel in an “MAYAK SERVICES LIMITED” Vehicle
- Camps, quarters, parking lots, fitness centers and other locations outside the worksite, even if under the responsibility of “MAYAK SERVICES LIMITED”, the Client or an “MAYAK SERVICES LIMITED” Contractor

Automotive Accident Rate (AAR)

Number of “MAYAK SERVICES LIMITED” Involved Catastrophic, Major, and Serious (CMS) Automotive Accidents per thousand

“MAYAK SERVICES LIMITED” Vehicles per year:

Month: $AAR = CMS \text{ AAs} \times 12,000 / \text{Month fleet Count}$

Year to Date: $AAR = YTD \text{ CMS AAs} \times 12,000 / YTD \text{ average fleet Count} \times \text{Number of months YTD}$

Lost Time Injury (LTI)

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Any injury (and/or occupational illness) resulting from an accident and which causes the victim not to be able to return and perform the same job function within the next 24 hours, regardless if the next day is a regular work day or not, and regardless if transportation to the work site is available or not. Logistical delay for the purpose of medical examination shall not be taken into account when establishing the 24 hour period. If the injury happens just before the victim goes on vacation and a medical examination reveals later on that the victim is unfit for work, the injury is a LTI. If the victim resumed work normally after the injury, but later on, as a consequence of the same injury, has to be put off work or on light duty, the injury shall be reclassified as a LTI. <u>Non-Lost Time Injury (NLTI)</u> Any work related injury which is not a LTI. <u>Light Duty (LD)</u> Any work performed by a person that does not include all the normal duties of the regular job. <u>Days Without Lost Time Injury (DWLTI)</u> Number of consecutive days worked without a LTI. The very first day worked without an injury following a lost time injury is numbered "day # 1". <u>Suspended DWLTI</u> The DWLTI count will continue as long as there are 50% (of normal LPG Plant activities) or greater personnel assigned or under direct supervision, regardless of the LPG FILLING PLANT’s activity. The Operation Manager shall review and decide on any individual cases where the MAYAK SERVICES LIMITED Head Office is unable to determine if the LPG FILLING PLANT should or should not continue its DWLTI count. <u>LTI Rate (LTIR) per thousand employees / Used by “MAYAK SERVICES LIMITED”</u> Number of LTIs per one thousand employees per year: Month: LTIR = LTI x 12,000 / Month-end headcount Year to Date: LTIR = YTD LTI x 12,000 / YTD average headcount x Number of months YTD <u>LTI Rate per one thousand employee</u> Number of LTI expressed per one thousand Company personnel working per year. LTI / 1,000 Employees / Year		

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Man hours

Total number of hours worked by the Company personnel, including overtime and training, but excluding travel time, leave, rest, sickness, and other absences.

LPG FILLING PLANT Man-hours

Actual Man hours worked on a LPG FILLING PLANT by “MAYAK SERVICES LIMITED” employees and sub-contracted employees working under “MAYAK SERVICES LIMITED” supervision.

Administrative Man hours

Man hours worked in offices, yards, and training centers.

Risk Identification Rate

Total number of Accidents, Near Accidents or hazardous situations reported per employee per year

Month: $RIR/H/Y = \text{Number of reports in month} \times 12 / \text{Month-end headcount}$

Year to Date: $RIR/H/Y = \text{Number of reports YTD} \times 12 / \text{YTD average headcount} \times \text{Number of months YTD}$

Contractor

Any company or person providing services on a routine basis to “MAYAK SERVICES LIMITED”.

Headcount

Total number of “MAYAK SERVICES LIMITED” personnel at month-end, including full and part-time employees, contracted personnel, consultants, and employees on rotation, days-off, field breaks, or vacation.

Third Party

Anyone who is not a “MAYAK SERVICES LIMITED” Employee, Contractor employee, or Client.

Recognition

Praise for anyone showing excellent implementation of good HSE practices.

Residual Risk

The risk remaining after prevention and mitigation measures actions have been implemented.

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Rollover

Any incident involving “MAYAK SERVICES LIMITED” Vehicle in which the wheels of any vehicle leave the ground and the sides, front, rear or top of the vehicle make contact with the ground.

Loss

The negative consequence or cost of an accident. Includes all direct and indirect costs irrespective of insurance compensations.

LPT

Loss Prevention Team

Occupational Illness

Any work related illness resulting in days away from work, days of restricted work activity, job transfer, medical treatment or abnormal health condition. The basic difference between injury and illness is the single event concept. If the damage resulted from something that happened in one instant, it is an injury. If it resulted from prolonged or multiple exposure to a hazardous substance or environmental factor, it is an illness.

Permanent Partial Disability

Any injury which results in the complete loss, or permanent loss of use, of any part of the body, or any impairment of functions of parts of the body.

Life Loss

The number of days lost allocated is 6000. It is counted as an LTI.

Days Lost

It represents, in the case of a reportable accident, either the number of days of unfitness for work as per Doctor's certificate, or the number of days allocated in case of a permanent disability (partial or total), or death.

Part Per Million (PPM)

Concentration of a gas or liquid, in volume per million of volumes. *One ppm is equal to 0.0001 % concentration.*

Risk Identification Rate

Number of potential risks (Potential accident reports) identified per employee per year, RIR / Employee / Year

Restricted Areas

Areas prohibited to non-essential personnel.

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He, Him, His

Shall mean: he/she, him/her, his/hers.

Shall

Indicates a mandatory requirement.

Should

Indicates a recommendation.

Will

Indicates a future commitment.

Abbreviations

CPR Cardio Pulmonary Resuscitation.

DWLTI Days Without Lost Time Injury

HSE Health, Safety and Environment.

LD Light Duty

LEL Lower Explosive Limit

UEL Upper Explosive Limit

LPG Liquefied LPG Gas

LTI Lost Time Injury

MSDS Material Safety Data Sheet

NLTI Non Lost Time Injury

PA Public Address

PMS Planned Maintenance System

PPE Personal Protective Equipment

PPM Part Per Million

PTW Permit To Work

RIR Risk Identification Rate

SCBA Self Contained Breathing Apparatus

SWL Safe Working Load

VAPS Vehicle Accident Prevention System

5.2 Risk Minimization

5.2.1 Systems:

Systems shall be in place to ensure the:

- Identification of hazards associated with our products and services
- Assessment of risk

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- Identification of appropriate prevention and mitigation activities.

HSE risks associated with every product used, manufactured, sold or transported by “MAYAK SERVICES LIMITED” or its contractors shall be assessed, and systems shall be in place to incorporate risk assessment in all “MAYAK SERVICES LIMITED” activities.

5.2.2 Communication

Employees, customers, contractors and all relevant third parties shall be informed of hazards and risks and the required prevention and mitigation measures.

5.2.3 Accountability

Systems shall be in place to communicate the assessed risks to the appropriate, accountable level of

“MAYAK SERVICES LIMITED” management, commensurate with the magnitude of the assessed risk. All related decisions shall be clearly documented.

5.2.4 Risk Management training

Employees shall receive formal training in Risk Management.

5.3 Prevention and Mitigation Measures

Required prevention and mitigation measures shall be implemented and then verified

5.3.1 Permit to Work System (PTW)

MAYAK SERVICES LIMITED shall have a Permit to Work (PTW) System in place.

5.3.1.1 Purpose

A Permit to Work (or Work Permit) is a formal written authorization used to control certain types of work, which are identified as potentially hazardous. It is also a means of communication between site management, LPG FILLING PLANT supervisors and operators and those who carry out the work.

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5.3.1.2 Objectives and functions of the permit to work system

- Ensure that proper authorization is given to carry out specific work at a certain time and place
- Ensure that personnel carrying out the work clearly understand the nature of the job, the hazards involved, and the limitations on the work and the time.
- Specify the precautions to be taken before starting the work, during the work and after its completion.
- Ensure that the GENERAL MANAGER is fully aware of the work being done.
- Provide a record showing that the type of work and the proper working procedures have been checked by an approved person.
- Provide for the suitable display of open or suspended permits.
- Provide a procedure for times when work must be suspended.
- Provide for the procedures or arrangements for other activities that may interact or affect one another.
- Provide a formal hand-over procedure for use when work is to be carried out for a longer period than a shift or when permit signatories change.
- Provide a formal hand-back procedure to ensure that any part of the LPG FILLING PLANT affected by the work is in a safe condition and ready for reinstatement.

5.3.1.3 Responsibility of the Permit to Work System

The GENERAL MANAGER has the responsibility of the correct implementation and use of the permit to work system.

5.3.1.4 Types of Work Permits

Any hazardous work shall require at least one of the following work permits :

- Safe Work Permit.
- Hot Work Permit.
- Electrical Work Permit.

In some cases several types of permits may be required for a complex task.

5.3.1.5 Tasks to be covered by a Safe Work Permit include but are not limited to :

- Entering confined spaces
- Pressurized operations
- Authorized exemptions from a “MAYAK SERVICES LIMITED” Procedure
- Maintenance operations that disable critical safety systems, such as fire and gas/flammable vapour detection systems, communication systems, and rescue equipment, fire fighting equipment, emergency devices, ...

5.3.1.6 Tasks to be covered by a Hot Work Permit include but are not limited to:

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- Hot work of any type (welding, cutting, burning).
- Any work generating ignition sources inside hazardous area.
- Any of the above works in any area of the worksite, when a potential hazardous situation is anticipated, because of the work itself, or because of the adjacent operations

5.3.1.7 Tasks to be covered by an Electrical Work Permit include but are not limited to:

- Any electrical work that may be hazardous to life.

5.3.1.8 Tasks to be covered by an isolation requirement within a Work Permit include but are not limited to:

- Any work on equipment, or close to equipment that may be remotely activated.
- Any work on electrical equipment or a circuit that has a remote control breaker.
- Any work on hydraulic or pneumatic piping or apparatus that may be pressurized from a remote point, or circulated with fluid or gas.
- Any work on mechanical equipment that may be started by any means.
- Any work inside a tank, ballast, container that may be flooded by fluid or invaded by a toxic or explosive atmosphere.

Isolation may be necessary to safely perform an authorized task. In this case, an isolation shall be requested and detailed on the corresponding Work Permit.

5.3.1.9 Request for a Work Permit

All Work Permits shall be requested by the Supervisor responsible for the work to be performed. This applies to all potentially hazardous works to be performed by Company and third party personnel. Filling in the work permit form shall be performed by a Company Supervisor.

5.3.1.10 Approval of the Work Permit

Work Permits may be approved only by the GENERAL MANAGER or his designate. In this case designate shall be LPG FILLING PLANT superintendent, Asst. LPG FILLING PLANT superintendent. Head Office approval may sometimes be required; however, this alone is insufficient, GENERAL MANAGER approval shall also be obtained.

No one may authorize a Work Permit for work that he carries out himself.

A work permit can only be approved when the work site has been inspected by the approver.

5.3.1.11 Validity of the Work Permit

Permits are not to be carried over from one shift to another. A Permit is no longer valid whenever a change occurs in:

- Personnel carrying out the work,
- Working conditions, that were not anticipated when issuing the work permit, or

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- When the permit is suspended.

Under no circumstances, shall a task that is the subject of a Work Permit be continued if the Permit issued is no longer valid.

5.3.1.12 Suspension of the Work Permit

In the event the work is suspended, upon GENERAL MANAGER decision, before completion of the work, the area shall be secured and zoned off if necessary. If an isolation was in force, it shall be maintained. The original Work Permit previously given to the Supervisor or the person performing the work shall be returned to the GENERAL MANAGER.

To resume the work suspended, a new Work Permit shall be requested and approved by the GENERAL MANAGER, and attached to the previous one.

5.3.1.13 Completion of the work

Once the work is completed, necessary checks shall be made by the Supervisor in charge of the work.

The permit shall then be signed off by the responsible Supervisor of the work performed and the GENERAL MANAGER.

This closes the work permit.

5.3.1.14 Administration of the Work Permit

Work Permit form: Appropriate “MAYAK SERVICES LIMITED” forms will be used. However, Client's work permit forms may be used provided they meet the same intent of the “MAYAK SERVICES LIMITED” system.

In any case only one type of permit form shall be used, to avoid duplication and errors.

5.3.1.15 Display of valid or suspended Work Permits

In order to permanently monitor the on-going Work Permits, a Permit To Work board (PTW board) shall be installed. The PTW board allows supervisors on the worksite to know the current status of the on-going work. The PTW board shall be in an adequate place, and in a location determined by the GENERAL MANAGER.

The GENERAL MANAGER shall designate a person (called the Work Permit Administrator) to administer the PTW board, i.e. ensuring that the board permanently shows the Work Permits opened and currently valid.

The first copy of the work permit shall be used for display.

The Work Permit Administrator and the GENERAL MANAGER shall be the only persons authorized to modify or change the Work Permits displayed on the PTW board.

5.3.1.16 Dispatching and Filing

- When approved by the GENERAL MANAGER, the original of the Work Permit shall be given to the person in charge of the job.
- The first copy shall be given to the Work Permit Administrator for posting on the

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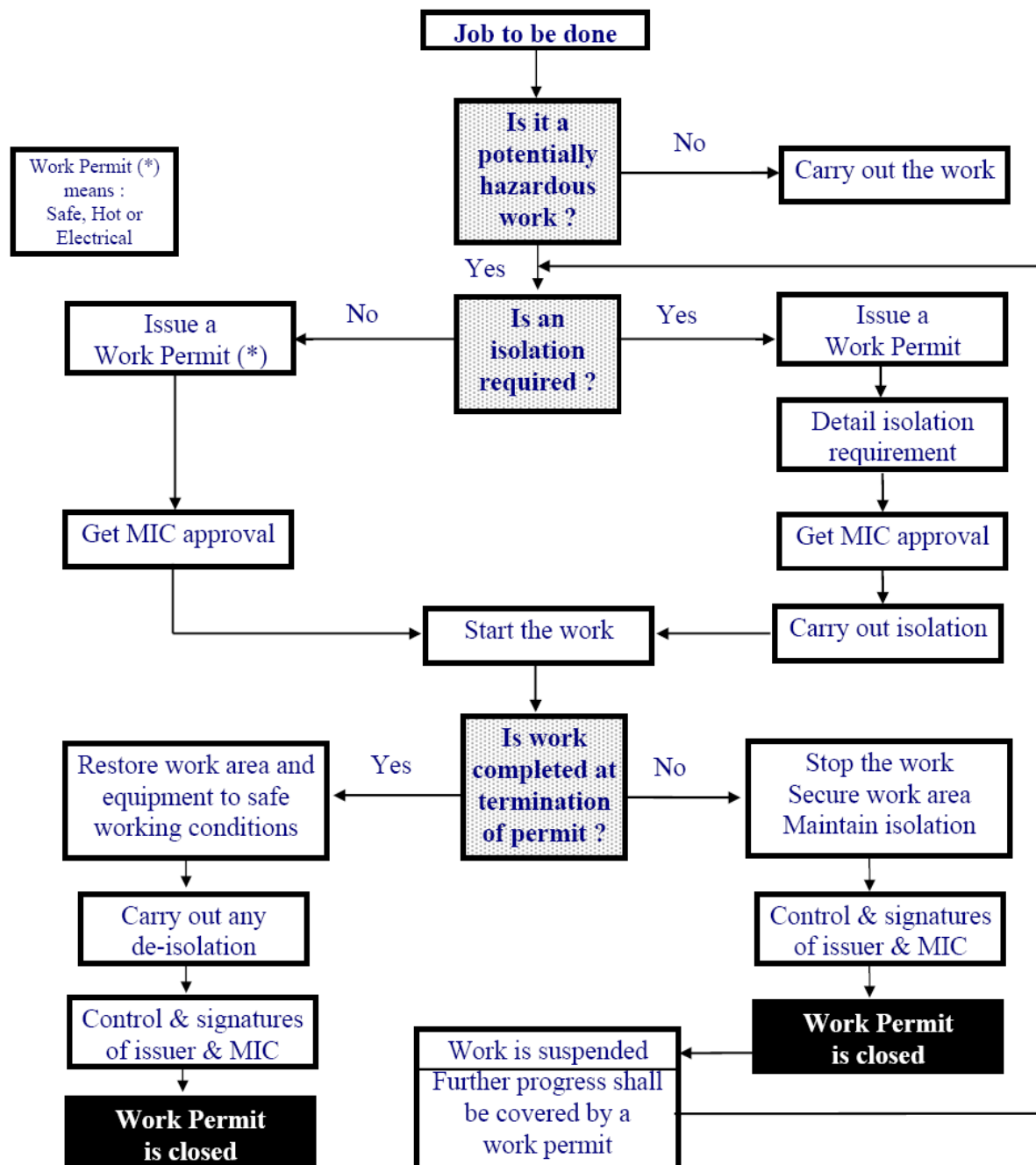
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Permit to Work board.

- The second copy shall be retained by the Responsible Supervisor in charge of the work.
- Once the task is completed, all Permit forms used shall be collected by the Work Permit Administrator and the original copy shall be signed off by the responsible Supervisor and by the GENERAL MANAGER.
- When the Permit is closed, the original shall be put in the Work Permit chrono file and other copies discarded.
- The Work Permit file shall retain the closed Work Permits for at least one year after they are issued.
- The numbering shall be chronological, regardless of the type of Permit issued.
- The first number shall be 001, from the time the present system is started.
- The Work Permit file shall have a reference index that shall be used for logging each Work Permit issued, and filed.

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5.3.2 Management of Temporary Change

5.3.2.1 Authorization to Rig-up Client or Third Party Equipment

Before installing any client or third party equipment that may create a hazard when rigged-up and/or operated, an authorization to rig-up third party equipment shall be approved by the GENERAL MANAGER.

The purpose of issuing an authorization to rig-up client or third party equipment is to ensure that it does not create any hazard to Health, Safety or working Environment and to identify any deficiency in advance.

5.3.2.2 The equipment shall be inspected by a “MAYAK SERVICES LIMITED” qualified person in accordance with the check list included in the authorization to rig-up client or third-party equipment. The completed check list shall be handed over to the GENERAL MANAGER for approval.

5.3.2.3 Any unsatisfactory items shall be reported to the Client and Third Party Representative, along with possible remedial actions.

5.3.2.4 Should it be impossible to put the equipment in a safe condition, the authorization shall not be approved and the GENERAL MANAGER shall inform the Client representative as soon as possible.

5.3.2.5 The authorization to rig-up client or third party format should be used.

5.3.2.6 The issuance of the authorization to rig-up client or third party equipment does not preclude the application of the Work Permit procedures.

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5.4.2 Exemption

5.4.2.1 If, in exceptional circumstances, a “MAYAK SERVICES LIMITED” policy, standard and/or procedure cannot be complied with, operations may proceed only if an "Authorization for Exemption" has been granted.

5.4.2.2 All past and current request forms for "Authorization for Exemption" shall be retained in a dedicated file and kept in the GENERAL MANAGER'S office.

Recommended Control Mechanism: Exemption request binder

5.4.3 Handover Process

Supervisors shall conduct a formal handover whenever they are transferring the responsibility for supervising a task to another designated supervisor, such as at shift change.

5.4.3.1 Handover shall be in writing when handover is occurring.

5.4.3.2 The handover shall include but is not limited to:

- Detailed explanation of all known tasks which the incoming supervisor will be responsible for supervising.
- Clear explanation of which personnel are assigned to perform each separate task.
- Detailed explanation of all tasks requiring a Permit to Work.
- Detailed explanation of any task requiring a Permit to Work that also requires equipment to be isolated, locked out and tagged out.
- Any safety issues which are related to the tasks which are being handed over.
- Detailed explanation of any other operation or condition which could threaten the safety of LPG FILLING PLANT personnel.

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6 Design and Planning

HSE shall be integral to the design, development and delivery of “MAYAK SERVICES LIMITED” products and services.

6.1 Asset Integrity

6.1.1 Equipment & Systems Utilization, Inspections, & Maintenance:

Equipment and Systems shall be operated, inspected, maintained and repaired in accordance with Company standards, procedures and policies

6.1.2 Equipment & Systems Modifications :

No Modification to the Original Design and / or the Service of a piece of Equipment or System shall be performed on a LPG FILLING PLANT site, or in a designated workshop without prior approval from the Managing Director.

These approvals shall be obtained by the LPG FILLING PLANT Manager from the Technical Department. The request for approval shall be formulated with an e-mail bearing as minimum the LPG FILLING PLANT Name, Request No., Date of the Request, Subject, General Manager's Name, Degree of Urgency, Brief description of the intended Modification, Reasons, Requested Support if any, and supported by appropriate documents explaining the scope in further details (photos, sketches, cost & time estimate, schedule, weight breakdown, calculations, etc.). A Project Control Form would be open at top management level as and if necessary. Formal Approval or Rejection will be issued by email. All the requests shall be logged, and a chrono maintained on the LPG FILLING

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PLANT.

6.1.3 Equipment Purchasing

HSE requirements shall systematically be incorporated into the design and purchasing criteria of equipment and products used in "MAYAK SERVICES LIMITED" operations.

6.2 Processes

Operational, manufacturing and engineering processes shall systematically take HSE aspects into consideration. HSE critical processes shall be identified, mapped and regularly reviewed to assess HSE implications and actions required to minimize the risk of malfunction or process error. Where simultaneous operations are undertaken, the impact of one operation upon another shall be assessed and recorded, and safeguards shall be in place to mitigate cumulative effects.

6.2.1 Electrical Equipment for Classified Areas

All electrical equipment installed in a classified area shall have a correct type of protection.
The classified areas drawings on each BULK LPG FILLING PLANT shall be defined by the "MAYAK SERVICES LIMITED" Engineering department.

6.2.1.1 Classified areas

All "MAYAK SERVICES LIMITED LPG FILLING PLANT shall have clearly identified hazardous areas.

Definition of classified areas:

- Zone 1 - In which an explosive gas/mixture is likely to occur in normal operations.
- Zone 2 - In which an explosive gas/mixture is not likely to occur in normal operation

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and if it occurs, will exist only for a short time.

Non-hazardous area: manned or unmanned areas in which an explosive gas/mixture will not occur in normal operations.

Note: a "zone 0" is also defined as a zone where an explosive gas/air mixture is continuously present or present for long periods.

6.2.1.2 Equipment suitable for classified areas

Electrical equipment shall comply with flag authority and API specifications for each of the classified areas.

6.2.1.3 Combustion engines located inside zone 2

All combustion engines operated within a zone 2 area shall be equipped with:

- spark arresting system on exhaust (or spark arrestor silencer)
- quick shut-off device acting on fuel supply and/or air intake manifold
- Engines permanently located within a zone 2 area will be equipped with a flameproof starter (air).

6.2.3 Electrical lockouts

All electrical equipment or electrically driven components will have lockout safety switches. Before performing any work on such equipment, it shall be locked out and corresponding switch gear panel tagged, to prevent accidental activation.

6.2.3.1 A work permit shall be obtained prior to commencing potentially hazardous work on any electrical equipment or electrically driven equipment.

6.2.3.2 A test shall be performed on the isolated equipment to verify that the isolation is effective.

6.2.4 Electrical work

Only personnel approved by the GENERAL MANAGER shall perform electrical work.

6.2.4.1 Water shall not be used to clean around generators, electrical switchboards, and other electrical apparatus.

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6.2.4.2 Wherever possible, electric cables and/or extension cords will be run overhead and not run on the ground.

6.2.4.3 Broken or defective cords shall be immediately removed from service and repaired by approved electrician.

6.2.4.4 Extension lights or other spark causing devices shall not be tolerated in the PLANT.

6.2.4.5 Power hand tools shall not have a positive locking device.

6.2.4.6 Live electrical equipment and components shall only be worked on with proper non-conductive tools.

6.2.4.7 Non-conductive mats shall be placed in front of the switchboards, transformers, and maintained in a clean and dry condition.

6.2.4.8 All high voltage panels above 480 volts shall be clearly marked.

6.2.4.9 Power control room, generator room (including emergency generator room), and other areas containing high-voltage panels shall be labelled "*No entry to unauthorized persons*", in both English and the predominant local language.

6.2.4.10 Whenever possible, air powered tools shall be preferred to electrical tools for outdoor work.

6.2.4.11 Portable ladders made of non-conductive material shall be used for electrical work.

6.2.4.12 Breaker switches shall not be thrown in or out under loaded circuit.

6.2.4.13 Calibrated fuses shall never be replaced by makeshift conductors. Fuse pullers shall be used for handling fuses.

6.2.4.14 Modification of original wiring shall not be done without following "MAYAK SERVICES LIMITED" procedure for modification.

6.2.4.15 Working alone in the LPG FILLING PLANT is not allowed.

6.2.4.16 Safety Procedure for rescuing a victim suffering from electrical shock shall be posted in all switch gear rooms.

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6.2.5 Hazardous Condition and Operations

6.2.5.1 Restricted Areas

Signs shall be posted, to clearly identify restricted areas.

6.2.5.1.1 The use of pictogram type signs is recommended to identify hazards within restricted areas.

Recommended document : Safety Signs Standard

6.2.5.2 Protection

Fences, barriers, covers, guards and handrails shall be installed to control access to restricted areas.

6.2.5.2.1 Fixed handrails with toe board shall be installed on all decks, raised floors, walkways, and on any work platform over 1 meter (3 feet) in height.

6.2.5.2.2 Handrails shall be at least 1.2 meters (4 feet) high, with an intermediate rail and toe board. Toe board to be not less than 10 cm (4 in.) high.

6.2.5.2.3 Chains shall not be used as permanent handrail.

Stairs

6.2.5.2.4 All stairways shall be provided with handrails and non-skid treads.

Guarding

6.2.5.2.5 All exposed moving parts of machinery shall be guarded.

6.2.5.2.6 Any hot pipe work or surfaces which could cause burns to personnel shall be guarded.

6.2.5.3 Confined Spaces and Tank Entry

No one shall enter a confined space or tank without a work permit.

Confined spaces and tank entry procedures shall be complied with.

6.2.5.3.1 The following equipment shall be available for confined space and tank entry :

- A portable gas detector capable to continuously monitoring the oxygen content, H₂S content, and L.E.L.
- Accessories to allow remote detection.
- A portable tripod with a combined fall arrestor-retrieving winch, or similar system.

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- One 30 minutes SCBA per person. - One (1) full harness with lifeline per person. - An explosion-proof air exhaust fan (electrical or air operated). - A minimum of two (2) explosion-proof portable lights. - Explosion-proof radio communication set. - Signs. 6.2.5.3.2 Before completely removing the fastening devices on a confined space, the internal pressure shall be checked and vented if necessary. 6.2.5.3.3 Sounding of the tank shall be done before entering inside. In case of doubt and suspected presence of water, floatation devices shall be worn by personnel. 6.2.5.3.4 All valves leading to the confined space shall be identified and mechanically/electrically isolated. 6.2.5.3.5 The area shall be ventilated and tested for safe entry. 6.2.5.3.6 A standby man shall be appointed at the entry site and be in contact with a control point (and with the personnel entering the confined space if possible). 6.2.5.3.7 A tally of the persons inside shall be maintained by the standby man at the entry site. 6.2.5.3.8 Not less than two (2) persons shall be in the confined space at any time. 6.2.5.3.9 Adequate tools and PPE shall be worn. 6.2.5.3.10 The atmosphere shall be continuously monitored with the portable gas detector. 6.2.5.3.11 Permanent ventilation shall be in force during the entire entry period 6.2.5.3.12 LPG-tanks shall not be entered without Operation Manager approval. 6.2.5.3.13 No hot work shall be performed on the periphery of tanks used for the storage of volatile liquids or gas without LPG FILLING PLANT Manager approval. In all cases, work shall not commence before proper ventilation is achieved and verified. <i>Recommended Control Mechanism : Work Permit</i> 6.2.5.4 Working Over Water On LPG FILLING PLANT Jetty, no over the side work shall be permitted without a work permit.		

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6.2.5.5 Hazardous Substances Handling and Storage

Safety Data Sheets (“SDS”) shall be available on each LPG FILLING PLANT for each type of chemical used.

6.2.5.5.1 The GENERAL MANAGER or his designate shall verify that any chemical received on the LPG FILLING PLANT is properly labelled on its container, and that the “SDS” is provided. If no “SDS” is available, the product shall not be used until the “SDS” information is provided.

6.2.5.5.2 The GENERAL MANAGER or his designate shall ensure that personnel working with hazardous substances are made aware of “SDS” handling requirements.

6.2.5.5.3 The storage of all hazardous substances shall be in accordance with the “SDS”.

6.2.5.5.4 Suitable first aid equipment and/or fire-fighting equipment in accordance with “SDS” shall be located in the vicinity of the handling/storage area.

6.2.5.5.5 Transferring Flammable and/or Combustible fluids

Transfer of flammables and/or combustible fluids should be done in accordance to the procedures outlined in the Leak detection plan.

6.2.5.5.6 Flammable and/or combustible fluids are toxic and the recommended handling and protective clothing recommendations must be followed.

6.2.6 Communications

6.2.6.1 Public Address System (PA)

The PLANT shall be equipped with a Public Address system that can be clearly heard and understood throughout the LPG FILLING PLANT.

6.2.6.1.1 The exception to this shall be the Jetty.

6.2.6.1.2 There shall be a radio communication between the Ship/Barge, the Jetty and the LPG FILLING PLANT.

6.2.6.1.3 All Hand-held radios used on LPG FILLING PLANT shall be of the intrinsically safe type.

6.2.7 Welding and Cutting

Welding and cutting shall be carried out by approved persons only.

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Compressed gas cylinders storage, handling, and marking

6.2.7.1 Compressed gas cylinders shall be handled carefully. They shall be stored vertically away from ignition sources. The cylinders temperature should not exceed 54 degrees Celsius.

6.2.7.2 Verification of gas shall be done upon receiving the cylinder, by an approved person.

- Oxygen shall be checked using a portable oxygen detector.
- Acetylene is a combustible gas, and shall be identified with the portable gas detector, or combustible gas detector.
- Nitrogen is an inert gas. Presented to the oxygen meter, it will show deficient oxygen concentration.

6.2.7.3 Compressed gas cylinders shall be legibly marked for identifying the gas content with either the chemical name or the trade name of the gas (Ex:O₂ for oxygen, N₂ for nitrogen, A for argon, etc.).

Such markings shall be made by means of paint stencilling or labelling and shall not be readily removable. When practical, the marking should be made on the shoulder of the cylinder.

6.2.7.4 Oxygen and acetylene or gas shall be stored separately in appropriate racks, and have the valve protected from shocks during handling, either by having a protector cap screwed on, or by a top protection on the rack itself. Oxygen cylinders shall be stored away from fuel gas cylinders, reserve stocks of carbides, or high combustible materials (especially oil and grease). The minimum distance shall be 6 meters (20 ft); an alternative is to install a non-combustible barrier at least 1.50 m (5ft) high.

6.2.7.5 Cylinders shall never be used as rollers or supports, even when considered empty.

6.2.7.6 A leaking cylinder shall never be used, and shall be immediately emptied and removed from the worksite.

6.2.7.7 Leaks shall be detected either with soapy water or leak detector, but in no circumstance flame or lighted cigarette shall be used.

6.2.7.8 Oxygen shall never be used in place of compressed air or for cleaning purposes.

6.2.7.9 Oxygen shall never be used in air starters.

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Torch Cutting equipment

6.2.7.10 Pressure reducing regulators shall be used on all oxygen-acetylene cutting and welding assemblies.

6.2.7.11 Regulator gauges shall not be used if the glass cover is broken or cracked. Damaged regulators shall immediately be replaced.

6.2.7.12 Oxygen and acetylene regulators shall only be repaired by authorized factory representatives.

6.2.7.13 Oil, soap or grease shall never be used for connecting the regulators to the gas cylinders.

6.2.7.14 Union nuts and connectors on regulators shall be inspected for faulty seats by the user before being put in service.

6.2.7.15 Check valves shall be installed on all cutting/welding torches. Flashback arrestors shall be installed on all regulators at bottle end.

6.2.7.16 Hoses and connections shall be inspected for leaks, burns, worn places, or other needed repairs.

Damaged hoses shall be repaired or replaced.

6.2.7.17 Connections that do not fit shall never be forced. An oxygen pressure reducing regulator shall never be connected to a fuel gas cylinder.

6.2.7.18 The pressure downstream from the acetylene regulator shall never exceed 100KPa (15 psi).

6.2.7.19 Torch cutting of closed containers that have held a flammable substance is prohibited.

6.2.7.20 When working in an enclosed area, a careful check with a portable gas detector shall be made; any time there is an interval between cutting or welding operations, to monitor the possible accumulation of gas. Furthermore, continuous ventilation shall be ensured, to extract possible gas and fumes.

6.2.7.21 Extreme care shall be exercised to prevent slag or sparks from igniting flammable materials, such as insulation materials, wood, fabric, or flammable liquid. In case of an identified fire risk, a fire watch with a portable fire extinguisher shall be present during all

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the time the welding or cutting is carried out. The fire watch shall be trained in fire fighting.

6.2.7.22 All hot work outside the designated welding area shall require a hot work permit.

6.2.7.23 Depending on the nature of operations engaged, a Hot Work Permit may also be required for jobs carried out inside the designated welding area.

6.2.7.24 The welder shall check the welding leads for burns, breaks, or other defects before use. Welding cables shall not be repaired using tape. Welding leads shall be picked up and properly coiled after completion of work, and shall not be left in a place where they can create a tripping hazard.

6.2.7.25 Vapour from arc welding may be harmful. Adequate ventilation shall be ensured when welding on alloys or surfaces coated with lead based paints that may generate harmful fumes. If ventilation cannot be accomplished, proper respiratory protection shall be worn.

6.2.7.26 When work is completed, oxygen and acetylene supply shall be turned off at source.

6.2.7.27 Appropriate welder PPE shall be worn by the welder and his assistant(s), including :

- Long sleeves fire-retardant coverall
- Leather apron
- Welder's gloves
- Welding screen and goggles

Recommended Control Mechanism : Hot Work Permit

6.2.8 General and Miscellaneous

6.2.8.1 Weapons and substance abuse

All LPG FILLING PLANT shall have a weapons and substance abuse policy posted in conspicuous places.

6.2.8.1.1 It is the responsibility of the Country Operation Manager to issue a weapons policy for the operating area.

6.2.8.1.2 Unauthorized possession or use of drugs, narcotics, alcohol and weapons is not

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permitted at LPG FILLING PLANT. Furthermore, reporting to work, working, driving Company automotive under influence of alcohol, drugs or narcotics is not authorized by the Company.

6.2.8.1.3 All personnel contracted or otherwise, on “MAYAK SERVICES LIMITED” installations can be subject to searches and/or urine analysis screening requested by “MAYAK SERVICES LIMITED” or its clients without prior notice.

6.2.8.1.4 These searches may include the person, his or her personal effects, lockers, desks, offices and quarters. The Company can also search other areas of its worksites, as well as crew change vehicles, aircraft and boats.

6.2.8.1.5 Any individual discovered in possession of a prohibited item will be removed from the LPG FILLING PLANT on the first available transportation. Any individual who, as a result of urinalysis or blood analysis screening, is found to have traces of a prohibited substance in his system, may be liable to disciplinary action.

6.2.8.1.6 Personnel taking prescribed medication must present a statement from their doctor detailing the medication, reason for use, and expected duration of the treatment. This information should be presented to the medic upon arrival at the worksite.

6.2.8.1.7 Refusal by any individual to agree to a search and/or urinalysis screening will result in removal from the LPG FILLING PLANT.

6.2.8.1.8 Drug screening shall be carried out under supervision of a Doctor.
Ref. Document: “MAYAK SERVICES LIMITED” Substance abuse policy

6.2.8.2 Horseplay and Practical Jokes

Horseplay or practical jokes are not permitted on any “MAYAK SERVICES LIMITED” worksite, at any time.

6.2.8.3 Smoking

Smoking will be allowed only in designated areas.

6.2.8.3.1 The GENERAL MANAGER will decide these areas.

6.2.8.3.4 "No smoking" signs shall be posted in common areas where smoking is prohibited.

6.2.8.4 Swimming and Diving

Recreational swimming and diving is prohibited from all LPG FILLING PLANT's Jetty.

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6.2.8.5 Housekeeping

Each worksite shall maintain the highest standards of housekeeping at all times.

6.2.8.5.1 Floors, steps and stairs shall be kept clean and free from oil, grease and other slippery substances.

6.2.8.5.2 Steps, walkways, passages and doorways shall be kept clear of obstructions.

6.2.8.5.3 Soiled cleaning materials, scrap and waste oil shall be placed in the appropriate containers for proper disposal.

6.2.8.5.4 All offices and workshops shall be kept clean and clear of scrap.

6.2.8.5.5 Cargo handling materials shall be stored in a designated area.

6.2.8.5.6 Escape routes and access to safety equipment shall not be restricted in any way.

6.2.8.6 Basic Safe Operating Practices

All personnel shall follow the “MAYAK SERVICES LIMITED” procedures on basic safe operating practices.

Stepping

6.2.8.6.1 Personnel shall not run or rush in the workplace. Emergency drills shall always be carried out at walking pace.

6.2.8.6.2 Stairs shall be climbed up/down with at least one hand holding the handrail.

Use of hand tools

6.2.8.6.3 All crew members shall be shown the proper functions and operations of the hand tools, during their basic training period. Supervisors shall make sure that the LPG FILLING PLANT tool is used for the job.

6.2.8.6.4 All tools shall be inspected before use. They shall be kept clean and in good working order.

6.2.8.6.5 Hand tools shall be kept in a designated area when not in use, either in a tool rack or on tool board, in an orderly manner.

6.2.8.6.6 Wood handles shall be sound and securely wedged or fastened to the tool.

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6.2.8.6.7 Tools made of high strength alloys or brittle steel shall not be struck by/with a tool of similar characteristics.

6.2.8.6.8 Non-sparking tools shall be used when working in an explosive atmosphere.

6.2.8.6.9 Tools shall be always used with the appropriate PPE.

Painting

6.2.8.6.10 No one shall be allowed to paint in an unventilated area. If necessary, air-supplied respirators will be provided to the personnel.

6.2.8.6.11 When using spray equipment, painters shall wear filter masks and goggles, or air-supplied respirators. Exposed skin shall be coated with barrier cream.

Load Binders (Load binders are used to tighten loads)

6.2.8.6.12 The one stroke type of binder is forbidden and must not be used.

6.2.8.6.13 No cheater bars will be used with these binders.

The Ratchet type binder, eg. Lebus L-140, with continuous take-up and adjustment (click-click), recoilless, must be used...

6.3 Planning

Operational plans shall systematically incorporate HSE requirements. A formal HSE assessment shall be conducted prior to initiating any project or operation, to ensure that all HSE aspects have been addressed as planned.

6.3.1 HSE Plans

6.3.1.1 Corporate Guidelines for HSE Plans

The Corporate Guidelines for HSE plans are issued at MAYAK SERVICES LIMITED Corporate level by the Managing Director. They shall form the basis of MAYAK SERVICES LIMITED HSE plan.

6.3.1.2 Specific HSE Plans

This Health, Safety and Environmental Policy Manual demonstrates Mayak Services Limited commitment to continually protect the Health and Safety of her Staff/Contractors/Clients/ and Environment where they do business and proudly issue this document in this respect. – March, 2023 |

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Specific HSE plans shall be established by MAYAK SERVICES LIMITED at the beginning of the year. LPG FILLING PLANT specific HSE plans shall be approved by the GENERAL MANAGER and shall be developed jointly with LPG FILLING PLANT personnel and LPG FILLING PLANT management.

6.3.1.3 Communication of HSE Plans

When approved, the HSE plans shall be communicated to all relevant Company personnel. The plans shall be posted at the respective worksites. Techniques like meetings, slide presentations, videos, etc... may be used to inform the relevant Company personnel. The HSE plans shall be communicated to the Client/Contractors where necessary.

6.3.2 Environmental planning

"MAYAK SERVICES LIMITED" shall continually strive to minimize the impact of its operations on the environment. Plans shall be developed and appropriate actions taken to prevent environmental pollution, conserve resources and minimize waste. Where elimination of a Spill/pollution/Leak source is not practical, appropriate treatment of waste shall be undertaken and monitored to minimize the impact of discharges and disposals on the environment.

Referring Standards: Environmental Management System (EMS)

6.3.3 Health Planning

The exposure of all employees, customers, contractors and the general public to hazardous conditions associated with our operations shall be assessed on a continuous basis to minimize risks to health. Measures to limit exposure to identified health hazards shall be defined and implemented, and any exposure to hazardous agents shall be measured periodically and the health of relevant personnel monitored. The company shall also pursue a proactive approach toward the general health awareness of all employees, their families and contractors.

6.3.3.1 Pre-Employment Medical Examination

Prior to employment, personnel shall be medically examined at a Company appointed medical centre in order to assess the individual's fitness for work.

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6.3.3.1.1 Similar examination is recommended for sub-contracted labour.

6.3.3.1.2 A certificate of fitness shall be issued by the examining physician.

Recommended Control Mechanism: “MAYAK SERVICES LIMITED” Confidential Med track physical form

6.3.4 Special Medical Examination

Prior to resuming work after an injury or illness, the “MAYAK SERVICES LIMITED” employee shall be confirmed fit to work by a Company appointed doctor.

6.3.5 COVID-19 Prevention

All “MAYAK SERVICES LIMITED” employees shall comply with the prevailing NCDC and WHO guidelines for the COVID-19 Infection Prevention and Control.

6.3.6 Health Alert Notice

All “MAYAK SERVICES LIMITED” employees returning from a tropical region in Africa, Asia, Latin America, shall carry a personal card called "Health Alert Notice". In case of illness within the 6 weeks following return, the card should be presented to the consulting physician advising him of recent travel.

6.3.7 Vaccinations

All “MAYAK SERVICES LIMITED” employees working outside their home countries shall have current valid vaccinations required by the country of assignment. It is recommended to follow MAYAK SERVICES LIMITED vaccination guidelines.

6.3.8 Noise

Each LPG FILLING PLANT shall establish a map indicating the zones where noise levels are above 85dba.

This map shall be posted on the HSE bulletin board.

6.3.9 Personal Medical Record

A personal medical record shall be established for each of the Company personnel assigned to a LPG FILLING PLANT. This record shall contain information which might be required in case of emergency, and shall also mention any illness or medical treatment followed by the individual.

6.3.9.1 The personal medical record shall indicate:

- The name and address of the new arrival
- His blood group.

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- Any known allergy to drug or treatment
- Any known physical pre-existing condition
- Any known medication taken or given
- Person to contact in case of emergency

6.3.9.2 It is the LPG FILLING PLANT HSE Department's responsibility to ensure that the above information is gathered from each newcomer, and that proper personal record forms are completed.

6.3.9.3 The personal medical record shall be filed in the HSE Manager's filing system and shall be kept confidential and current.

6.3.9.4 In case of medical evacuation, the HSE Manager shall complete the reverse side of the personal medical record form which shall accompany the evacuated person.

6.3.9.5 The HSE Manager shall inspect the first aid boxes weekly, and replenish as necessary.

6.3.10 Personal Hygiene

Anyone present on a "MAYAK SERVICES LIMITED" installation shall conform with elementary personal hygiene standards such as: regular showers, changing clothes, shaving, treatment of minor injuries, proper use of facilities (sanitary, bathrooms, disposals).

6.3.13 Medical care

MAYAK SERVICES LIMITED shall have retainership with a recognized and reputable hospital which shall readily provide medical care to all LPG FILLING PLANT Personnel.

6.3.14 Security planning

Security plans shall be in place to protect employees, families and all other people directly involved with our activities as required by the level of risk.

6.4 Emergency Response

Plans for coping with all aspects of an emergency shall be created and regularly practiced to ensure that all parties charged with emergency preparedness and crisis management are aware of their roles and responsibilities

6.4.1 Emergency Response Plan

There shall be Emergency Response Plans at Company Headquarters, as well as MAYAK SERVICES LIMITED LPG FILLING PLANT. The Emergency Response Plans shall be in writing and made available to the personnel concerned.

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6.4.1.1 Approval of the Emergency Response Plans:

Each Plan shall be approved by the General Manager in charge of the operation.

The level of approval is as follows:

At LPG FILLING PLANT level – The General Manager

6.4.1.2 Scope of the Emergency Response Plans:

The Emergency Response Plans shall cover the various scenarios resulting in possible critical situations and shall mention the course of action recommended.

The Emergency Response Plans are recommended to cover, when and where applicable :

Medical evacuation

Missing person

Road accident

Fire/Explosion

Emission of flammable or toxic substances

Sabotage/criminal acts/riots/war

Leak/Spill/Pollution control

6.4.1.3 All the applicable Emergency Response Plans shall be maintained in one binder.

Recommended Control Mechanism : Design and Planning binder / Emergency Response section

6.4.2 Alarms

The GENERAL MANAGER is responsible for defining clearly distinguishable alarm signals to identify various emergency situations.

6.4.2.1 Alarms will be tested during drills.

6.4.2.2 Alarm signals will be clearly posted in conspicuous places.

6.4.3 Drills

Exercises and drills shall be attended by all required personnel and conducted on a regular basis and, over an agreed period of time, cover all scenarios of high risk potential and all aspects of the contingency plans and response procedures. In addition, key personnel shall be trained to a level of competence appropriate to their responsibilities in emergency scenarios.

6.4.3.1 List and frequency of drills:

Fire and evacuation drills once a week on LPG FILLING PLANT.

Leak drill once every month

Other Emergency Response drills as mentioned in the Emergency Response Plan.

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6.4.3.2 Drills Evaluation

The GENERAL MANAGER shall evaluate the drill, with the Supervisors and personnel involved, upon completion of the drill.

6.4.3.3 Recording of the drills

The drills shall be recorded in the Daily Drilling Report in use.

6.4.3.4 Drill Procedures

Conduct of the drill

- The drill shall be pre-planned and should emphasize the key learning points.
- The drill should be held on varying days of the week and at varying times. The scenarios of the drill shall change, incorporating operational problems to better assess reaction of LPG FILLING PLANT workers. For example: simulate a spill situation, where the Man in charge of Spill response is incapacitated, etc...

Fire drill

Purpose: To prepare LPG FILLING PLANT crew for the emergency of a fire and to demonstrate that personnel can perform their assigned duties.

Conduct of the drill

- Fire drill should be followed by abandonment drill every week.
- At least once a month, the drill should include a mock injury or a rescue situation.
- The scenario of the drill shall change, incorporating operational problems to better test the reaction of the LPG FILLING PLANT personnel.
- For example : empty fire extinguisher, fire team leader incapacitated, etc ...
- The observer of the fire will immediately pass the alarm and indicate the location of the fire.
- The designated alarm will be sounded.
- The GENERAL MANAGER or his designate shall immediately go to the designated command center.
- Personnel not assigned to the fire fighting/rescue team or to critical LPG FILLING PLANT operations, shall muster promptly at the required location. Excused attendance shall require prior approval of the GENERAL MANAGER.
- Muster shall be taken by a designated person.
- The fire fighting/rescue team shall muster at the fire station closest to the fire location with the appropriate equipment.
- A designated person shall start the fire pump and stand by for instructions.
- Reports shall be regularly rendered to the command center.
- Before securing from the fire drill, the GENERAL MANAGER is responsible for clearly indicating what additional actions would be taken in the event of a real fire.

6.4.4 Personnel (Muster) List

Each LPG FILLING PLANT shall maintain a personnel (Muster) list of everyone on the

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LPG FILLING PLANT. This list shall be updated as often as necessary by a person designated by the GENERAL MANAGER, so that it is always current.

6.4.4.1 The personnel list shall be available in LPG FILLING PLANT's Security Main gate at all times.

6.4.5 Medical Emergency Response Plan

The LPG FILLING PLANT shall have a Medical Emergency Response Plan. The plan shall be posted in conspicuous places.

6.4.5.1 The Medical Emergency Response Plan should indicate actions and contingencies to address adequately the medical emergency.

Recommended Control Mechanism: Medical Emergency Response Plan

6.4.6 Spills

"MAYAK SERVICES LIMITED LPG FILLING PLANT" shall have appropriate Leak Prevention/contingency plans

Recommended Control Mechanism: Leak/Environment history file

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7.1 Performance Review

Performance indicators in key HSE areas shall be identified, targeted, measured and reported to monitor continuous HSE performance improvement. Indicators shall be representative of the perception that our customers have of our performance.

7.1.1 Bulletin Board

MAYAK SERVICES LIMITED shall have a dedicated HSE Bulletin Board.

7.1.2 Days without LTI (DWLTI) Board

MAYAK SERVICES LIMITED shall have a DWLTI board updated every day.

7.1.3 Performance Environment Measurement

"MAYAK SERVICES LIMITED LPG FILLING PLANT" shall monitor the progress made on waste minimization.

7.1.3.1 MAYAK SERVICES LIMITED LPG FILLING PLANT shall define its own preferred methodology to monitor progress.

7.1.3.2 Waste minimization shall be monitored at three different levels:

- 1 Natural resources / Energy consumption
- Chemical usage
- Generation of waste

Annexed Documents: Waste Minimization Indicators

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7.2 Incident Reporting, Investigation and Review

7.2.1 Incident Reporting/Investigation

MAYAK SERVICES LIMITED LPG FILLING PLANT shall encourage the reporting and recording of all incidents.

7.2.1.1 Whenever an accident or a potential accident occurs at a “MAYAK SERVICES LIMITED LPG FILLING PLANT”, it shall be reported to the GENERAL MANAGER as soon as possible by the immediate Supervisor in charge of the operation.

7.2.1.2 All serious accidents and potentially serious incidents shall be investigated and analyzed, and lessons learned from these investigations shall be communicated and corrective actions implemented.

7.2.1.3 Investigation teams shall include the GENERAL MANAGER, the line management, the HSE Department and appropriate internal or external resources.

7.2.1.4 Investigations shall be conducted according to the “MAYAK SERVICES LIMITED LPG FILLING PLANT” accident investigation model.

7.2.1.5 Line management shall prioritize the remedial actions recommended in accident investigations, assign responsibilities and monitor their progress until completion.

7.2.1.6 The General Manager and Operations Manager shall ensure that management is advised of the occurrence and known details of the incident within 24 hours.

Control Mechanism: “MAYAK SERVICES LIMITED LPG FILLING PLANT”- Risk Identification and Accident Reporting

7.2.2 Fatality review and follow up

Fatality reviews shall be held for all “MAYAK SERVICES LIMITED LPG FILLING PLANT” involved' fatalities.

7.2.2.1 Reviews shall be attended by executive management and conducted by the line manager in charge of the operation where the fatality occurred.

7.2.2.2 All reviews shall be held within 90 days of the occurrence. Recommendations of the review committee shall be documented and disseminated in “MAYAK SERVICES LIMITED LPG FILLING PLANT”.

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7.2.3 Alerts

HSE Alerts: They are issued to advice LPG FILLING PLANT personnel of an immediate danger. It recognizes a serious deficiency in our equipment, procedures or HSE systems. An alert must reach the LPG FILLING PLANT and be acted upon on an urgent basis. The GENERAL MANAGER shall confirm that action had been taken. The alert is to be filed on the LPG FILLING PLANT in a special binder called "HSE Alerts".

7.2.4 HSE Database or accidental risk database.

The HSE Database is the “MAYAK SERVICES LIMITED LPG FILLING PLANT” HSE data capture.

The accidental risk database is composed of the incident reports, remedial action tracking HSE checks issued by each section.

This data base is maintained at the LPG FILLING PLANT for the Company at Headquarters level.

7.3 Inspection

Systematic inspections shall be conducted in all locations to ensure compliance with defined policies, standards and procedures

7.3.1 HSE Checks

The HSE Database HSE checks shall be updated and used to measure the level of compliance with the “MAYAK SERVICES LIMITED LPG FILLING PLANT” safety policies and procedures.

7.3.2 Equipment

All LPG FILLING PLANT equipment shall be inspected and maintained as per manufacturer recommendations/good practices.

7.4 Corrective action

Corrective action and continuous improvement programs shall be in place in the LPG Filling Plant, shall actively involve all our employees and our customers, and a "no blame" culture shall be promoted to encourage employees to report problems with and suggest improvements to existing standards, processes and systems shall be conducted in the LPG Filling Plant to ensure compliance with defined policies, standards and procedures.

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7.4.1 A non-conformance reporting process (e.g., Risk Identification Reporting, etc.) shall be in place, and employees shall be actively involved in this process.

7.4.2 Each remedial action shall have a responsible person designated and a target closure date.

7.4.3 All HSE non-conformance reports and suggestions shall be considered and closed out in a way that builds trust and demonstrates commitment to HSE performance improvement.

7.4.4 Regular feedback from the workers and from our customers on product/service quality shall also be encouraged, reviewed by management and captured to ensure continuous evolution and improvement.

7.4.6 Systems shall be established to identify customer needs and competitive Market developments.

7.4.7 The HSE function shall support line management in analysing problems and developing quality improvement plans with regard to customer needs and new technology.

7.4.8 Regular service quality appraisals (SQA) and reviews shall be held with customers as part of the continuous process of quality improvement

7.5 HSE Recognition

Recognition programs shall be established to encourage personnel involvement in the process of HSE improvement

7.6 Records

Procedures shall be developed to ensure that critical information is collected and analysed. Records shall be maintained to assess compliance with policies, standards and procedures and to monitor improvements in our processes

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8 Assessment and Continuous Improvement

8.1 Audits

Line management shall maintain an effective control process to ensure that the findings of audits are recorded, prioritized, actioned and closed out. Key lessons shall then be disseminated throughout "MAYAK LPG Filling Plant"

8.1.1 "MAYAK SERVICES LIMITED LPG FILLING PLANT" HSE MS Audits

8.1.1.1 Audits and reviews shall be conducted to verify the implementation and effectiveness of the HSE Management System.

8.1.1.2 Adherence to the HSE Management System shall be evaluated by means of both internal and external audits.

8.1.1.3 The frequency of these audits shall be determined by the perceived business risk but shall not exceed three years.

8.1.1.4 Managers shall record and report the results of audits and any other self-regulation processes to all concerned parties.

8.1.2 Hardware Audits

8.1.2.1 Hardware audits (to verify correct condition and maintenance of equipment) shall be carried out on the LPG FILLING PLANT site by designated personnel selected by HQS Field Support Department.

8.1.2.2 The frequency of these audits shall not exceed three years.

8.1.3 Medical Audits

Medical audit shall be carried out.

8.1.3.1 The medical audit will be discussed with the Operation Manager and the LPG FILLING PLANT General Manager and used to work out or review the Medical Emergency Response Plan.

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8.1.3.2 The medical audit will be carried out under the responsibility of the Operation Manager and must cover the following issues :

- Health risk profile
- Medical facilities available in the country and capability
- Accessibility to proper medical facilities (distance, private service, authorization...)
- Transport from worksite to appropriate medical center (when existing)
- Medical evacuation company locally available
- Medical Evacuation Company to be mobilized from abroad if needed.
- Procedure and formalities for emergency aircraft landing / taking off
- Local Doctor to recommend to the district
- Communications

8.1.3.3 The frequency of these audits shall not exceed three years

8.2 Reviews

Periodic management reviews of the HSE Management System shall be conducted to ensure the effectiveness of the system, and to identify and implement system improvements.

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