



SABSON ENERGY Co. Ltd Health, Safety, Environment, and Quality Policy Statement

It is the policy of SABSON ENERGY Co. Ltd to conduct all business activities in a responsible manner, which assures the health, safety and security of people, preservation of the environment, quality of the product/services and compliance with all applicable health, safety, environmental, security, legal, quality and regulatory requirements in countries where we operate.

To achieve this business ethic, we utilize Health, Safety, Environmental, and Quality (HSEQ) management systems that are designed to:

- Provide a framework that will comply with client requirements,
- Assign clear roles and responsibilities regarding HSEQ;
- Identify, analyze and effectively manage all risks arising from SABSON ENERGY activities;
- Provide systems of work, appropriate technology, tools, and procedures that meet appropriate performance standards;
- Maintain a constant vigilance and readiness to prevent and, where required, respond to and effectively manage emergencies;
- Continually monitor and improve our HSEQ systems and performance, including reducing and preventing pollution, through an on-going review of our objectives, targets, metrics, system gaps, and implementation of proper corrective and preventative actions.

These will be the guiding principles in our execution philosophy, procedures and commercial agreements.

This policy is applicable to all projects, operations, subcontractors and SABSON ENERGY Co. Ltd personnel worldwide.

HSEQ Management System Document Hierarchy

The HSEQ Management System comprises a hierarchical arrangement of documents and follows a structured approach to managing HSEQ risks. The lower levels within the document hierarchy must meet and support the requirements of the higher level documentation.



SABSON ENERGY HSEQ Policy (Tier 1)

The SABSON ENERGY HSEQ Policy defines the company's expectations and requirements in order to meet the organization's strategic objectives.

SABSON ENERGY HSEQ Standards (Tier 2)

The SABSON ENERGY HSEQ Standards establishes the company's expectations and minimum required performance objectives for managing HSEQ within SABSON ENERGY. The HSEQ Standards are mandatory to all SABSON ENERGY activities and operations.

Corporate Management System (Tier 3A)

The Corporate Management System comprises of SABSON ENERGY procedures and processes which outline specific activities (in line with the HSEQ Standards) that are applicable across all SABSON's operations. These documents address specific topics where it is important that the activities are carried out consistently across SABSON ENERGY.

Worksite Management System (Tier 3B)

The Worksite Management System outlines the processes and activities for managing HSEQ for a specific project or facility and intended to support the HSEQ Policy and the HSEQ Standards. They apply only within the facility or project in which they are issued.

The Worksite Management System makes provision for client- and/or country-specific requirements to be incorporated into the HSEQ Management System. Where the Corporate Management System documentation satisfies the country-or client-specific requirements, direct reference, or use, can be made to the corporate management system documentation.

Although the HSEQ requirements have been integrated in the HSEQ Standards, the decision of whether to comply with these HSEQ Standards by means of a single integrated system or separate systems is at the discretion of the individual project or facility.

Leadership and Commitment

Expectation:

Executive management, managers, staff, and subcontractors understand their HSEQ accountabilities and are responsible for leading and engaging in meeting HSEQ Policy, standards, objectives and goals.

Performance Objectives

Processes are in place to meet the following requirements:

- 1.1 Managers are accountable for the HSEQ performance of the business, the implementation and communication of the HSEQ Policy, and meeting HSEQ performance objectives.
- 1.2 Managers provide adequate and sufficient resources for the effective implementation and operation of health, safety, environmental and quality management systems and the provision of specialist advice.
- 1.3 Managers demonstrate visible leadership and proactive commitment to achieving HSEQ excellence and continual improvement through personal example, by promoting initiatives, and by frequent site inspections and reviews.
- 1.4 Managers include specific and measurable HSEQ activities and results in performance plans and appraisal systems for all staff.
- 1.5 Managers ensure that staff and subcontractors understand that they have the right and responsibility to stop work or refuse to work until conditions are made safe, as well as to bring these conditions to the attention of management.
- 1.6 Managers ensure compliance with laws, regulations, permits and customer requirements relating to HSEQ is maintained across all SABSON ENERGY fs activities.

1.7

Managers shall ensure that customer requirements are determined and are met with the aim of enhancing customer satisfaction.

Policy and Strategic Objectives

Expectation:

An HSEQ Policy and Management System are established which sets the HSEQ expectations with clearly defined performance objectives identified to enable the company to achieve the requirements of the policy.

Performance Objectives

Processes are in place to meet the following requirements:

2.1

Executive management endorses the HSEQ Policy and seeks assurance of compliance by systematic and regular review of health, safety, environmental and quality performance.

2.2

Managers are accountable for the implementation and communication of HSEQ Policy requirements and meeting HSEQ performance standards required.

2.3

Executive management establishes and documents measurable HSEQ objectives, targets, and performance indicators.

2.4

HSEQ Plans (and programs) include designated responsibilities, resources, and time frames to achieve goals and targets.

2.5

Risks and legal requirements are considered when establishing HSEQ objectives, targets, and performance indicators.

2.6

HSEQ Performance measurements are used to refine plans, objectives, targets, and performance indicators to improve.

- 2.7 HSEQ initiatives and positive outcomes are recognized and rewarded.
- 2.8 Managers report progress against HSEQ objectives, targets, and performance indicators to executive management, at least quarterly.

Organization and Communication

Expectation:

Management ensures an organization is defined; responsibilities are clearly identified, with resources commensurate with implementing the requirements of the HSEQ Policy. Personnel are competent to conduct their assigned activities, training provided, recorded and evaluated to maintain their skills and competencies, with their competencies regularly assessed. HSEQ matters are effectively communicated throughout the organization, and to the customer, when applicable.

Performance Objectives

Processes are in place to meet the following requirements:

- 3.1 HSEQ responsibilities, accountabilities and authorities of staff and subcontractors are identified, defined, documented, maintained, understood, and applied.
- 3.2 Recruitment for staff includes an assessment of HSEQ awareness, competencies, and performance.
- 3.3 Staff and subcontractors are consulted on HSEQ matters and included in related decision making, as appropriate.
- 3.4 Inductions addressing relevant HSEQ objectives, hazards, risks, controls, and behavior are conducted for staff, subcontractors, and visitors.

- 3.5 HSEQ competencies required for all positions are identified, documented, and periodically reviewed.
- 3.6 Systems are in place to identify, prioritize, plan, document, and monitor training needs and performance for staff and subcontractors.
- 3.7 On-the-job behavior observation programs are encouraged to correct at-risk behavior and reinforce positive behavior.
- 3.8 Competence-based training programs and assessments are in place for positions where critical HSEQ tasks/activities have been identified.
- 3.9 HSEQ matters are effectively communicated throughout the organization with relevant information on HSEQ issues being communicated to personnel on a regular basis.
- All internal and external complaints related to HSEQ aspects of our operations are recorded, acknowledged, and investigated as incidents.

Hazards and Effects Management

Expectation:

Hazards are identified and associated risks assessed. The hazards and effects management processes form an integral part of decision making and are documented, with appropriate action taken to manage risks to a level that is tolerable and as low as reasonably practicable (ALARP).

Performance Objectives

Processes are in place to meet the following requirements:

- 4.1 Hazards and risks are identified, evaluated, prioritized, and controlled by a structured process, including means that address normal and non-routine work activities.
- 4.2 Formal risk assessments are planned and conducted during all phases/activities.
- 4.3 HSEQ critical elements are identified (e.g. equipment, processes, personnel, procedures).
- 4.4 Staff and subcontractors involved in hazard identification, evaluation, control, and formal risk assessments are trained and qualified.
- 4.5 Reporting and documentation requirements of hazard identification, evaluation and control, and formal risk assessment and risk management are defined and executed effectively and in a timely manner.
- 4.6 Risks are communicated to relevant interested parties, as appropriate.
- 4.7 Responsibilities and deadlines for corrective actions are established to ensure timely close-out of risk-related follow-up actions.

4.8

The results of hazard identification, evaluation and control, and formal risk assessments are considered in the preparation and review of emergency response plans and procedures.

Purchasing and Subcontractor Management

Expectation:

The contracting of services and the purchase, hire, or lease of equipment and materials, are carried out in a manner to ensure that HSEQ expectations are aligned so as to maximize company performance and customer satisfaction while minimizing adverse effects on HSEQ.

Performance Objectives

Processes are in place to meet the following requirements:

5.1

Suppliers and subcontractors are subject to an HSEQ evaluation and/or reevaluation prior to contractual arrangements being established.

5.2

Contracts specifically require subcontractors to implement systems and provide resources to meet the HSEQ policies, objectives, and requirements.

5.3

Interfaces with suppliers of services and products are identified and effectively managed.

5.4

HSEQ performance of suppliers and subcontractors, and specifically their compliance with the obligations specified in contracts, are monitored and reported.

5.5

HSEQ requirements related to services, equipment, materials and qualification of personnel are specified prior to purchase and compliance with these requirements (i.e. HSEQ Project Plans) are verified prior to, during, or upon delivery, including required HSEQ documentation (e.g. operating and maintenance procedures, MSDS's, etc.)

5.6

Suppliers and subcontractors provide information on the HSEQ risks, hazards, aspects and impacts associated with their equipment, products, and services.

Design, Construction and Commissioning

Expectation:

New facilities, and modifications to existing facilities, will be designed, procured, constructed, and commissioned to manage HSEQ risks through the facility life.

Performance Objectives

Processes are in place to meet the following requirements:

6.1

Project and facility planning, design, construction and commissioning standards are developed, approved and meet or exceed all regulatory requirements, company standards and customer requirements.

6.2

Effective codes, standards, processes and procedures are applied during design and construction to ensure facility integrity throughout life-cycle requirements.

6.3

Deviations from design standards are identified, approved and managed with justifications documented and retained.

6.4

Potential HSEQ hazards are identified and their associated risks assessed and managed using appropriate tools.

6.5

Critical equipment, systems, procedures, and activities are identified and documented and performance standards verified.

6.6

Formal design and development review, verification, and validation studies are carried out based on risk assessments, accepted performance standards and customer requirements.

- 6.7 Specific HSEQ requirements and responsibilities for and during project execution are documented in Project HSEQ Plans which are communicated and well understood.
- 6.8 Pre and post start-up process reviews are carried out and documented to ensure that construction or modification is in accordance with design requirements and that all required verification, documentation, and training is complete.
- 6.9 Where applicable, customer property will be controlled and preserved.

Operations and Maintenance

Expectation:

All plant and equipment is operated, maintained, inspected, and tested using systems and procedures that manage HSEQ risks and drive continuous improvement.

Performance Objectives

Processes are in place to meet the following requirements:

- 7.1 Identify HSEQ critical items (equipment, processes and procedures), performance standards, safe operating envelopes, maintenance, and risk management tasks and activities.
- 7.2 Clearly defined start-up, operating, maintenance, shutdown, and work management procedures are in place with authorities defined.
- 7.3 Key operating parameters and performance indicators are established, documented, and regularly monitored.
- 7.4 Reliability and availability of safety critical items or equipment is assured through appropriate testing and maintenance programs.

- 7.5 Management of change procedures exist for temporary disarming or deactivation of safety critical items of equipment.
- 7.6 Risks are assessed and managed with consideration of simultaneous operations.
- 7.7 Quality assurance procedures exist to ensure equipment replacement or modification maintains design and operations integrity.
- 7.8 Operation and maintenance activities are undertaken by competent and trained personnel, capable of carrying out the required tasks and activities.

Change Management

Expectation:

Changes in design, operations, procedures, site standards, facilities, equipment, or personnel are evaluated and managed to ensure that HSEQ risks arising from these changes remain at an acceptable level.

Performance Objectives

Processes are in place to meet the following requirements:

- 8.1 The HSEQ risks and impacts of temporary and permanent changes, whether planned or unplanned, are formally assessed, managed, documented, and approved.
- 8.2 Changes associated with project execution, operations, facilities, equipment, procedures, laws, regulations, standards, materials, systems, services, organizations, staff, and subcontractors are identified assessed and managed.
- 8.3 Changes are communicated to all who may be affected, and training is provided as required.

- 8.4 Change Management actions are formally managed, along with the update of documentation, including preparation of 'as built' plans, to appropriately reflect the change.
- 8.5 The original scope and duration of temporary changes are not exceeded without review and approval.

Incident Notification, Investigation and Reporting

Expectation:

Incidents must be reported in a timely manner and summarized as part of monthly performance reports. Incidents are to be investigated for cause and corrective actions and analyzed for trending patterns at the corporate, site, and operations level. Effective corrective and preventive actions, with a focus on root cause and / or system failures, are taken and lessons shared to reduce future injuries and losses.

Performance Objectives

Processes are in place to meet the following requirements:

- 9.1 Maintained procedures are in place for the timely reporting, investigation, mitigation, and appropriate communication of all HSEQ incidents.
- 9.2 Incident investigations, including identification of root causes and preventive actions, are documented and closed-out.
- 9.3 Incident investigations identify and prioritize corrective and preventive actions, aimed at eliminating or reducing the risk of incidents.
- 9.4 In the event of a major incident, work shall not resume until actions have been taken to reduce the risk of recurrence, and authorization is given at the appropriate level.

- 9.5 Information gathered from incident investigations is analyzed to identify and monitor trends to improve standards, systems, and practices.
- 9.6 Lessons learned are shared across the organization and with other interested parties, as appropriate.
- 9.7 Major incidents are investigated by a multi-function team with participation from appropriate levels of management from outside the project or facility.

Crisis and Emergency Management

Expectation:

Procedures and resources are in place to effectively respond to crisis and emergency situations to protect staff, interested parties, and the environment. Threats and risks to personnel, assets, operations, and the environment are identified while actions and safeguards are implemented to manage them.

Performance Objectives

Processes are in place to meet the following requirements:

- 10.1 Identify potential incidents, emergency situations, and security threats along with their HSE impacts, including those associated with external activities.
- 10.2 Implement controls appropriate and practicable for the levels of risk assessed to the activities.
- 10.3 Plans that define responses to foreseeable scenarios are documented, accessible, and communicated.
- 10.4 Roles, responsibilities, and authorities for staff and subcontractors in responding to emergencies and security threats are documented, communicated, and understood.

- 10.5 Resources and emergency command centers required for emergency and security response are identified, maintained, tested, and readily available.
- 10.6 Emergency and Security Plans are maintained through annual reviews and regular drills and exercises to validate controls and preventative measures, including liaison with and involvement of, external support.
- 10.7 Personnel are adequately trained to both understand the regulatory requirements and apply the necessary controls and preventive measures as described in the Plans.
- 10.8 Lessons from emergency and security response drills, exercises, and incidents are documented, communicated, and incorporated into plans and resources.
- 10.9 Comply with all government and maritime security regulations.



Occupational Health and Safety

Expectation:

Personnel, including subcontractors where appropriate, are fit to perform their required duties and that appropriate controls are in place to provide protection from the health and safety hazards associated with the companies activities.

Performance Objectives

Processes are in place to meet the following requirements:

- 11.1 Occupational health and safety requirements are identified, documented, communicated, monitored, and complied with on all levels.
- 11.2 Where appropriate, staff and subcontractors undergo assessment to ensure their fitness for work, including drug and alcohol.
- 11.3 Occupational health and safety assessments are conducted for routine and non-routine jobs, tasks, and work environments where there is a known risk of health and safety hazard exposures to staff and subcontractors.
- 11.4 Where there is the risk of health and safety hazards, controls are established and maintained to protect staff and subcontractors from those hazards associated with their activities.
- 11.5 Where the application of controls has not adequately reduced exposure, personal protective equipment requirements are identified and communicated and appropriate training provided.
- 11.6 Properly maintained personal protective equipment, where required, is provided and made available to staff and subcontractors.

11.7

Compliance with (and the effectiveness of) personal protective equipment requirements is regularly assessed.

11.8

Staff, subcontractors, and visitors have access to adequate medical and first aid services, as appropriate, to the location and nature of the activities.

11.9

Work related injuries and illness are recorded, reported, assessed, and reviewed.

11.10

A safe and healthy lifestyle is promoted and encouraged.



Environmental Management

Expectation:

The environmental aspects and impacts from activities and operations are identified with measures taken to ensure they are minimized and adequately managed.

Performance Objectives

Processes are in place to meet the following requirements:

- 12.1 Procedures are in place to identify and determine the significance of environmental aspects and impacts of all operations, projects, goods, equipment and services.
- 12.2 Monitoring programs are established and initiatives developed to manage and improve environmental performance of significant aspects.
- 12.3 Pollution prevention and waste minimization programs are developed, implemented, and maintained to eliminate, reduce, reuse, recycle, treat, or appropriately dispose of waste.
- 12.4 Documentary evidence is maintained to demonstrate that hazardous waste has been managed in a responsible and appropriate manner.
- 12.5 Environmental wastes, discharges, and emissions are identified, monitored and reported, where appropriate, to ensure compliance with regulatory requirements.
- 12.6 Prior to the selection and use of new chemicals and materials an evaluation is performed to assess and control the potential adverse HSEQ impacts.
- 12.7 Reviews are conducted annually on the Aspects and Impacts Register and the Environmental Hazards Register.

Documentation and Legal Requirements

Expectation:

All applicable legislation will be identified and complied with, and documentation will be managed through formally controlled processes. Records will be maintained which are accessible and readily available.

Performance Objectives

Processes are in place to meet the following requirements:

- 13.1 HSEQ management system documents, drawings, design data, and other relevant documentation will be identified, controlled and maintained.
- 13.2 Pertinent knowledge and legal documents and records are identified, stored, and retained as necessary. Obsolete documentation is identified and guarded against unintended use.
- 13.3 Critical HSEQ management documentation is identified and its development and implementation assessed against measurable performance standards.
- 13.4 Employee health, medical, and occupational exposure records are maintained with appropriate confidentiality and retained as necessary.
- 13.5 Applicable laws, regulations, permits, codes, standards, practices, and other requirements are identified and monitored with requirements documented within the management system and communicated to the staff and interested parties.

Performance Monitoring, Assessment, Review and Improvement

Expectation:

HSEQ performance and systems are monitored, audited, and reviewed to identify trends, measure progress, assess compliance, drive continuous improvement, and provide assurance that management processes are working effectively.

Performance Objectives

Processes are in place to meet the following requirements:

- 14.1 The staff is actively involved in periodic self-assessments of the effectiveness of processes and procedures to meet HSEQ Performance Objectives.
- 14.2 HSEQ performance indicators (both leading and lagging) are established, communicated and understood throughout the organization.
- 14.3 Monitoring and measuring programs for key HSEQ performance indicators (i.e. processes and products) are established, documented, implemented and maintained.
- 14.4 HSEQ performance indicators are regularly used to determine when and what management system changes are necessary through trending analysis.
- 14.5 HSEQ behavior is improved through observation, recording, and coaching.
- 14.6 Procedures are in place for a documented, risk-based audit process for periodic evaluation of HSEQ objectives and targets, regulatory compliance, and effectiveness of the HSEQ management system.
- 14.7 Objective and systematic internal and external audits are planned and undertaken.

- 14.8 Non-conformances from assessment processes (audits, monitoring programs, inspections, products, etc.) are prioritized and tracked through documented corrective and preventative action programs with learnings applied into the HSEQ management system for improvement.
- 14.9 Non-conforming product shall be identified and controlled to prevent its unintended use or delivery.
- 14.10 HSEQ performance data is reported and treated equally with other key business indicators.
- 14.11 Site inspections and audits are undertaken at frequencies appropriate to level of risk.
- 14.12 Executive management review HSEQ management systems to continuing suitability, adequacy and effectiveness.
- 14.13 HSEQ goals, targets, performance indicators and customer satisfaction are reviewed at least annually.

Road HSE

Expectation:

This guidance applies to any employer, manager or supervisor with staff who drive, or ride a motorcycle or bicycle at work, and in particularly those with responsibility for fleet management. It also applies to self-employed people. Employees and trade union appointed safety representatives will also find it helpful. It covers people whose main job is driving, and those who drive or ride occasionally or for short distances. References to drivers and driving include riders and riding.

Performance Objectives

Processes are in place to meet the following requirements:

15.1

Your legal responsibilities. –

This leaflet deals with the requirements of health and safety law. These requirements are in addition to the duties you have as an employer under road traffic law, eg the Road Traffic Act and Road Vehicle (Construction and Use) Regulations, which are administered by the police and other agencies such as the Vehicle and Operator Services Agency.

15.2

The Health and Safety at Work requires you to ensure, so far as is reasonably practicable, the health and safety of all employees while at work. You also have a responsibility to ensure that others are not put at risk by your work-related driving activities. (Self-employed people have a similar responsibility to that of employers.)

15.3

Benefits of Managing work related road safety-

It allows you to exercise better control over costs, such as wear and tear and fuel, insurance premiums and legal fees and claims from employees and third parties.

It also allows you to make informed decisions about matters such as driver training and vehicle purchase, and helps you identify where health and safety improvements can be made.

Promoting sound health and safety driving practices and a good safety culture at work may well spill over into private driving, which could reduce the chances of staff being injured in a crash outside work.

Journey Management

Driver Working Hours

SABSON ENERGY CO. LTD monitors drivers' working hours and driving hours on daily basis to ensure that violations are not happening from the set guidelines of drivers' working hours. In case of any possible violations the same is brought to the attention of the customer representative and appropriate actions shall be initiated to prevent any future violations on drivers' working hours.

Route Hazard Mapping

SABSON ENERGY CO. LTD carries out route hazard mapping of all authorized routes and the threats and control measures identified shall be recorded in a stipulated format along with site pictures. This will be further disseminated to all concerned drivers through toolbox sessions and copy of the report shall be given to them for their reference.

SABSON ENERGY CO. LTD shall ensure that authorized routes are assessed periodically to incorporate any changes on road condition in the route assessment records.

Drivers are also encouraged to report any deviations or development of any unsafe conditions on the road due to constructions to the HSE Manager to initiate a re-assessment of the site and the records shall be updated accordingly.

On Board Computers (GPS Monitoring)

SABSON ENERGY CO. LTD has installed On Board Computers (OBC) to monitor and ensure that drivers are not violating set guidelines for safe driving, which includes drivers' working hours, adhering to the speed limits, harsh barking, etc. OBC reports are reviewed on regular basis and appropriate action shall be taken on defaulters like counseling and other disciplinary actions.

Road Checks

SABSON ENERGY CO. LTD conducts regular spot checks to ensure drivers comply with company's HSE requirement which includes using only authorized routes, adhering to the speed limits, usage of seat belts, applying defensive driving skills, carrying unauthorized passengers, etc. Checks on vehicle conditions like functioning of all lights shall also be included in spot checks.

The HSE department owns the responsibility of conducting the road check and a program on weekly basis is prepared to carry out the same and results are recorded for future verification.