

# **Health & Safety Policy**

POL-QH-HS-10-500-EN-V2 - Policy valid as of 13/12/22

# 1. Purpose

This policy defines the minimum requirements that the Company and its subsidiaries must implement to comply with Health and Safety standards.

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### 3. Definitions

The definitions below apply to this document:

Term	Definition		
Risk Management	Process that anticipates, define, and respond to operational risks.		
HSE	Health Safety and Environment		

## 4. Key Elements and Responsibilities

The Company Management is fully committed to give to its employees a safe and healthy place to work. Consequently, a series of programs are set up to ensure that our objectives are met. Roles and responsibilities are defined in the organization to follow-up on this company wide initiative.

The yearly HS objectives for the forthcoming calendar year are determined during the Business strategy review process along with Employee's consultation.

A Business SWOT analysis is performed that includes HS SWOT elements and feedback from Employee's consultation. From there on, opportunities are determined.

From the determined opportunities, the management selects which HS opportunities must be implemented (pertinent opportunities) for the forthcoming year.

From the established list of pertinent opportunities, HS strategic objectives are set.

At the end of the Business strategy review process, individual objectives are given to employees to match with the established strategic HS objectives.

#### **Chief Executive Officer:**

Oversees the implementation of this policy within the organization.

#### **Group QHSE Manager:**

- Designs the Health and Safety management system. Specifically:
  - o Identifies, communicates, and prepares Health and Safety risk-based programs and plans.
  - Measures program's effectiveness.
  - o Provides a system to assist employees for medical evacuation.
  - o Provides tools to set and measure Health and Safety objectives.
  - Approves and signs this policy



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#### Chief Finance and Human Resources Officer:

- Designs the employee Health Care system.
   Specifically:
  - o Implements the Health Care system within the organization.
  - o Establishes and follow-up the Health Care visits.
  - o Assists the Chief Executive Officer in medical evacuation events.
  - o Establishes disciplinary measures in case this policy is not followed by an employee.

#### **Country Manager:**

Implements this corporate policy in his/her organization.

#### **Employees:**

- Perform an annual medical visit.
- Comply with all Health and Safety Policies.
- Are consulted on the HS managing System's pertinence.

The programs below must be implemented:

### 4.1 Health and Safety Risk Identification Management

For Health and Safety purposes, a risk management system must be in place to eliminate hazards and reduce risks. This system must include:

- Nature of the encountered risk by the employee.
- Pre-defined actions must be documented in case of the realization of a risk.
- Procedure to follow by the employee.
- A process to include and assess newly identified risk.
- Stop-Work Authority of any individual to allow interruption of the work whenever an unsafe behavior is observed at the workplace that could compromise their safety or the safety of other persons. A HSSE Hazard observation Card (to be used in conjunction with "Stop Work" Card) must be filled in on that occasion to track observed unsafe behavior or condition and its correction.
- Health and Safety events must be recorded, analyzed, and documented.
- Job Safety Analysis (JSAs) must be conducted and recorded (on form FOR-QH-HS-10-512-EN) for nonroutine or safety / environmentally critical Jobs.
- A Permit to Work (form FOR-QH-HS-10-515-EN) must be issued for high-risk jobs / operations (those with potential of resulting in fatalities, major equipment damage, or significant spill). For these categories of jobs / operations, the JSA is a prerequisite to final Permit to Work issuance.

Sessions to identify new potential risks as well as session to identify new potential incidents must be logged in using the appropriate forms.



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### 4.2 Alcohol and Drug Safety

A system must be implemented to ensure that alcohol and drugs are not impacting our operational business. Tests must be recorded, and test failure communicated using the appropriate forms.

### 4.3 Maintenance of Equipment

A system must be implemented to ensure that the equipment we use in operations are maintained, in good condition, follow regulatory requirements and wears appropriate certifications. All rigging and lifting equipment are to be inspected every six months by an accredited third-party rigging specialist to ascertain that it is in good condition and safely serviceable. On completion of inspection, the color coding is then changed to a new color which is then valid for a further six-month period. Any defective equipment is to be immediately withdrawn from service and destroyed or sent for disposal.

#### 4.4 First Aid

A program must be in place to assist employees, visitors, sub-contractors who are located in the Company premises and who are in need of first aid assistance. This program must include:

- First aid training plan.
- First aid procedure.
- First aid kits, the kits' location must be known by the employees.
- Emergency numbers must be displayed.
- First aid kits must be verified every 6 months.
- First aid events must be recorded, analyzed, and documented.

### 4.5 Internal and External HSE Communication Program

A program must be designed to manage the Internal and the External Communication, which promotes HSE Management.

## 4.6 Behavioural Based Safety and Hazard Reporting System

A common behavioral based safety and hazard reporting system must be implemented on at-risk behaviors to provide a means of reporting both exceptional and unacceptable behaviors and hazards to be addressed through HSSE hazard observation cards and or "Stop Work" Cards. The key elements of the system to be:

- Provide a means of empowering workers to report issues and to ensure corrective actions are tracked through completion.
- Promote self-accountability for personnel.
- Support and recognize those who intervene and stop unsafe work, operations or conditions, situations.



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### 4.7 Personal Protective Equipment (PPE)

The management must ensure suitable and appropriate PPE is provided. This means that the PPE should be appropriate for the risk or risks involved and the conditions where it will be used.

PPE equipment is to be maintained and replaced as necessary.

Effective information must be given to the personnel to use the PPE equipment appropriately.

### 4.8 Employee Consultation and participation

The management must ensure that employees or representative are consulted on the understanding of HS needs of all relevant Interested parties, HS policy and its objectives, roles and responsibilities, compliance with legal obligations, the determination of preventive measures applicable to contractors, audit programs and continuous improvement.

The consultation implies an ascendant and descendant communication based on the dialogue and the exchange between employees and management.

## 5. Reference Documents

QHSE Quality Manual.

## 6. Related Documents

POL-MG-HR-10-100-EN	Travel Policy
POL-QH-HS-10-501-EN	Alcohol and Drug Policy.
POL-QH-HS-10-502-EN	Personal Protective Equipment Policy.
PRO-QH-HS-10-500-EN	Health & Safety Risk Management Procedure
PRO-QH-HS-10-501-EN	Incident Reporting & Investigation Procedure.
PRO-QH-HS-10-502-EN	Equipment & Maintenance Procedure.
PRO-QH-HS-10-503-EN	First Aid Procedure.
PRO-QH-HS-10-506-EN	Internal and External HSE communication Procedure
PRO-QH-HS-10-507-EN	Stop Work Authority Procedure.
PRO-QH-HS-10-508-EN	Personal Protective Equipment Management Procedure.
PRO-QH-HS-10-510-EN	Collaborator's consultation management procedure.
PRO-QH-SE-10-404-EN	Medical Evacuation Procedure.
WOI-QH-HS-10-500-EN	Stop Work Instruction.



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## 7. Related Quality System Records

FOR-QH-HS-10-500-EN Signaling New HS Risk filled form. Incident Reporting & Investigation filled form. FOR-QH-HS-10-502-EN Maintenance plan filled form. FOR-QH-HS-10-503-EN FOR-QH-HS-10-504-EN Vehicle Checklist filled form. FOR-QH-HS-10-505-EN Truck Control Checklist filled form. FOR-QH-HS-10-506-EN First aid kit Inspection Planning filled form. FOR-QH-HS-10-507-EN First Aid training plan filled form. FOR-QH-HS-10-508-EN Trailer Control Checklist filled form. FOR-QH-HS-10-509-EN Alcohol test filled form. FOR-QH-HS-10-510-EN Failed Test filled form. FOR-QH-HS-10-511-FN Vehicle LogBook Job Safety Analysis filled form. FOR-QH-HS-10-512-EN FOR-QH-HS-10-513-EN PPE Management Form. FOR-QH-HS-10-514-EN Toolbox Meeting FOR-QH-HS-10-515-EN Work Permit filled form. HSSE Hazard Observation Card filled form. FOR-QH-HS-10-517-EN FOR-QH-HS-10-518-EN PPE Requirements Matrix filled form. FOR-QH-HS-10-522-EN Collaborators Consultation Report

Any HSSE communication and meetings records.

# 8. Appendices

None.

# 9. Revision History

Version N°	Author	Effective Date (dd/mm/yy)	Description of Change (Including reason for change)
V1.0	Erwan YVINOU	01/12/21	Creation
V2.0	Erwan YVINOU	13/12/22	Replacing Country Director by Country Manager & removal of version ref.



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# 10. Approval

This document has been approved by its owner, checked by the reviewers and the QHSE Group Manager on 13 Dec 2022 (dd mmm yyyy).

Reviewed by the QHSE Group Manager:

Approved by the Chief Executive Officer: