PPI
Technology
Services Middle East (Ltd.)

HEALTH, SAFETY, AND ENVIROMENT MANAGEMENT MANUAL

Table of contents

HEALTH, SAFETY AND ENVIROMENT MANAGEMENT PROGRAM

PART 1
GENERAL HSE POLICY

PART1
GENERAL HSE POLICY

Contents

1.0 Introduction

1.1. Purpose

The Purpose of the HSE Manual is to:

- To Provide a management Guide to all employees of PPIME EGYPT
- Describe HSE process of PPIME EGYPT
- Describe the HSE responsibilities to clients and employees
- To promote and support a safe and Healthy environment which improves continuously
- To define individual HSE responsibilities
- To ensure legislative compliance and maintains audit records

1.2. Description

The HSE Manual is divided into three sections:

- Policy Principals and Implementation strategy
- Management Guide
- Detailed Procedures

1.3. Revision

The manual is under constant review and development. Up dates are proposed and authorized by the corporate HSE committee

2.0 PPIME EGYPT Health Safety and Environmental Policy

PPIME EGYPT Strives to be a leader in health and safety practices and in environmental standards in the oilfield service sector. We believe that HSE performance is an integral part of the efficiency and economics of our corporation. Therefore we intend to continuously improve our HSE performance, and be guided by the following principles:

2.1. Provide Safe and Healthy Work Environment

We will strive to create a working environment where accidents will be mitigated and which employees, contractors and the public will not be exposed to health hazards. Our employees and site contractors will be trained in workplace health and safety, and encouraged to adopt a healthy lifestyle

2.2. Deliver superior Environmental Performance

We will protect the environment by seeking to minimize the impact of our activities. We will strive for progressive improvement in the environmental performance by reducing wastes and the use of energy

We will measure our environmental performance on a continuing basis against objectives established regularly for PPIME EGYPT sites. We will have due regard for the concerns of employees, contractors, and the public in establishing these standards and performance targets

3.0 POLICY Implementation

This section describes how The PPIME EGYPT HSE Policy is implemented in EGYPT. It provides information on the-point management plan and the management structure, together with the definition of the key roles and responsibilities

3.1. PPIME EGYPT HSE principals

The managing director of PPIME EGYPT is responsible and accountable for the implementation of the health and safety policies and for on site HSE performance. This responsibility is delegated through line managers although the directing manager is Ultimately responsible for HSE it is the responsibility of each and every one of us on the Site to work together to manage these issues proactively and ensure continuous Improvement in our performance

3.1.1. success in HSE Management at PPIME EGYPT is based on the following Principals:

1. **Leadership, Commitment, Communication and Training**:managers Will demonstrate the standards required through personal example and by performing routine inspections HSE training requirements will be identified and implemented for all employees, contractors and visitors to enable all to perform their duties responsibly with due regard to health safety and environment. These requirements will be the subject of periodic review

2. **Risk Management**: Risk management is the foundation to an HSE Program each work site is different and only by assessing the risks at each site can effective control measures be put in place. We will periodically assess the risks of our activities set priorities and develop action plans to reduce risks and minimize HSE consequences

3. **Health and Safe Operations**: we will assess the exposure of employees and contractors to health and safety hazards and will implement programs to raise awareness and reduce hazards we will measure health and safety effects on staff and contractors and make this information public

4. **Environmental protection**: we will evaluate the opportunities for Preventing or minimizing pollution and waste and take action we will measure the input activities continuously

5. **Management of change:** there should be no changes to any operation without full appraisal of the HSE implications current and accurate information on operations, materials handled, potential health, safety and environment hazards will be maintained

6. **Third party interface**: the PPIME EGYPT HSE manual clearly documents our HSE procedures compliance is a condition of employment with PPIME EGYPT all contractors and site visitors are also required to conform to these procedures and the necessary training will be assessed

7. **Incident Reporting and investigation**: all incidents, including near Misses will be reported with serious and potentially serious occurrences Thoroughly investigated actions and lessons learned to prevent Recurrence will be communicated to all employees

8 **.Emergency preparedness**: effective plans will be maintained to deal With all foreseeable emergencies

9. **Self-Regulation, Audit and Compliance Requirement**: Compliance Assurance will be managed through a program of self assessment at all Levels of management we will conduct regular audits of all aspects of Our HSE performance to determine compliance and through active Follow-up will identify ways in which we can improve

3.1.2. Policy on substance Abuse

In order to minimize the likelihood of accidents we require the Performance of our employee's contractors and others on our premises To be unimpaired by any form of substance we will employ programs of education intervention and if necessary disciplinary action to achieve this objective.

Substances in this context include alcohol controlled substances drugs And other medication (whether illegal or legitimately prescribed or over The counter) which can be inhaled injected or ingested and which are Capable of effecting performance or judgment employee's contractors And others may bring prescriptions and other medication on site in Quantities consistent with personal likely to impair performance or Judgment

3.2. Organization and Responsibilities

3.2.1 Management Structure of PPIME EGYPT for HSE

The primary responsibility for HSE matters lies with line management this does not detract from the responsibility of each individual on site for HSE

3.2.2 PPIME EGYPT Managing director.

Authority

- From PPIME EGYPT to take measures necessary to assure HSE performance

Responsibilities

- Overall accountability for the implementation of PPIME EGYPT HSE policy and strategy within all operations in Egypt
- Demonstrating commitment in HSE matters and ensuring that HSE risks are controlled.
- Authorization of the necessary HSE resources and HSE plans for PPIME EGYPT sites.

- Assignment of accountability for the implementation of PPIME EGYPT HSE Policy and Strategy manual
- Ensure necessary audits and provide assurance that recommendations are being actioned
- Ensure that plans are in place for all levels of emergencies including the major incident plan and that these are regularly tested
- Reporting HSE performance and continuous improvements

Accountability

- Title bestows single point accountability for HSE performance of PPIME EGYPT

3.2.3 Line Managers

Authority

- From the managing director to take any measures necessary to assure HSE performance within their respective departments

Responsibilities

- Demonstrating commitment in HSE matters and ensuring that HSE risks are controlled and communicating these to respective line managers
- Controlling management of change
- Operating in accordance with PPIME EGYPT HSE policy principals
- Controlling the effectiveness of personnel and training programs
- Ensuring that plans are in place for all level of emergencies and these are regularly tested the most important of these being the major incident plan
- Reporting HSE performance and continuous improvement to respective line managers

Accountability

- Ultimate accountability for HSE within their department to the managing director

3.2.4. HSE Coordinator

Authority

- From the line Manager to proactively consider HSE matters within the business of PPIME EGYPT

Responsibilities

- Advising the safety committee on HSE issues
- To provide day to day coordination and link on all HSE matters within the company
- Provide a focal point for the reporting of incidents

- Raising the awareness of HSE within PPIME EGYPT
- Advising and assisting line managers with their HSE responsibilities
- Monitoring the compliance of site HSE policy
- Coordinating and assisting with auditing to assure compliance with policy organization and systems of the PPIME EGYPT HSE manual
- Ensuring that the HSE Manual remains current
- Sharing HSE information with contractors and other interested organizations
- Ensuring that all Emergency plans are current workable and tested
- Providing leadership in risk assessment tasks
- Assist with Risk Assessment of all areas
- Assists in identifying and preparing procedures on safe systems of work
- Compile site incident statistics
- To conduct incident investigations
- Manage and train emergency response teams

Accountability

- To the line manager and safety committee for implementation and monitoring HSE performance within PPIME EGYPT and for sharing best practices with all sites

3.2.5. On-Site Personnel

Authority

- From the policy statement in the PPIME EGYPT HSE manual to satisfy themselves that both regulatory and company standards relating to HSE are satisfactorily managed and complied with

Responsibilities

- Taking all reasonable care for the health and safety of themselves their colleagues contractors and visitors
- Taking reasonable care of the environment as impacted by our work activities
- To cooperate with managers on health safety and environmental matters
- To respect and correctly use anything provided in interests of HSE to report any defect which could give rise to hazards
- To report near misses incidents and accidents

Accountability

- To line managers for meeting their HSE obligations and in ensuring the requirements of this HSE manual are met

HEALTH, SAFETY AND ENVIRONMENT MANAGEMENT PROGRAM

PART 2
MANAGEMENT GUIDE

PART 2

MANAGEMENT GUIDE

Contents

1.0 Introduction

For a company to progressively improve its safety program and enhance the knowledge of its employees and contractors all people involved require the correct attitude towards safety the primary is to create a safety culture within PPIME EGYPT this involves developing values attitudes competencies and patterns of behavior in groups and individuals that determine the commitment to and the proficiency of the health and safety program

To accomplish this task management at all levels must support safety with their actions this document provides you the manager with guidance on how to identify and fulfill your HSE duties when used properly it will be a source of information about those duties a record of how you have discharged them and provide a plan that will help you to meet both present and future HSE

1.1. Minimum standards

Each line manager should undertake the following:

- Complete an annual HSE activity plan this will detail obligations and objectives the plan should include:
    - Conduct quarterly housekeeping audits of his area of responsibility
    - Conduct two planned general workplace inspections
    - Conduct one planned general inspection of the offices
    - Attend all monthly safety meetings

- Review the risk assessments for his area of responsibility these assessments are available in the safety office
- Review HSE training records for personnel under his control
- Review the statutory examination and test list documentation for equipment in the area of responsibility

1.2. HSE Activity Plan

The following is an activity schedule that can be used to plan the various prescribed HSE management activities for a given year this schedule should be prepared the beginning of each year by filling in the dates various tasks and once completed signing off for each task

ACTIVITY	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
SAFETY MEETINGS												
plan												
Actual												
House keeping tour												
plan												
Actual												
SITE INSPECTION												
plan												
Actual												
OFFICE INSPECTION												
plan												
Actual												
HSE TRAINING REVIEW												
plan												
Actual												
RISK ASSESSMENT REVIEW												
plan												
Actual												
STATUTORY EXAM REVIEW												
plan												
Actual												
The checklists for inspections are available from the office the safety consultant if available is more than happy to accompany managers on inspections												

2.0 leadership commitment Motivation and Training

2.1. Training

The HSE coordinator will coordinate all safety training to personnel this subject Should be addressed formally every year to review priorities and address special Needs line managers will review training records at regular intervals (quarterly) to Ensure actions are completed and look at individual training needs the safety Training subjects list in the Appendix of part 3 section 1 of this manual could help Identify needs

A database of employee training records will be maintained on the computer at the Lagos corporate office

All new field employees must receive induction training from the appointed supervisor An Employee induction checklist (following) should be prepared and included in the Personnel file for each newly inducted employee

2.1.1. PPIME EGYPT HSE Employee Induction Checklist

PDL HSE EMPLOYEE INDUCTION CHECKLIST		
NAME:	JOB:	
SUPERVISOR:	DATE OF STARTING:	
ITEM	**COMPLETED**	
		Date
1.0 introduction to PPIME EGYPT HSE Policy		
2.0 fire prevention		
2.1 smoking policy		
2.2 location and purpose of fire fighting equipment		
2.3 fire doors		
2.4 disconnecting electrical equipment		
2.5 Storage of flammable materials		
3.0 EMERGENCY PROCEDURES		Date
3.1 Fire Alarms		
3.2 site evacuation alarms		
3.3 Muster points evacuation routes		
3.4 First aid procedures, clinic location		
4.0 SAFETY AWARENESS AND REPORTING		Date
4.1 safety incident form		
4.2 reporting minor injuries		
4.3 safety injury categories		
4.4 incident investigation		
5.0 HEALTH PROTECTION		Date
5.1 Safety assessments-COSHH and Inspections		
5.2 respiratory protection		
5.3 Eye Protection		
5.4 General PPE		
5.5 Manual handling		
6.0 permit to work system		
7.0 compressed gases		
8.0 Electrical Equipment		
9.0 housekeeping		
Training Required		
Inductors Signature	Date	

New Arrival Signature	Date	

2.2. Safety Meetings

Safety meetings are an excellent opportunity to provide staff with relevant comprehensible information on health safety and environmental issues they also provide an opportunity for lessons learned and progress on HSE issues to be discussed Monthly Safety meetings should be arranged

Topics and information from the PPIME EGYPT safety Committee meetings will passed on to work sites to be reviewed in location safety meetings topics that arise in site specific safety meeting that cannot be handled locally be forwarded to the PPIME EGYPT safety committee for review and processing

Minutes of all safety meetings will be prepared and displayed in each office using the appropriate form (safety meeting-HSE Discussion Issues following).

2.2.1. Safety meeting HSE discussion Issues

HSE ISSUES ADDRESSED AT SAFETY MEETINGS		
DATE	TOPICS DISCUSSED	ACTION

2.3 Employees at special Risk

Line managers are also required to review the status of individuals who may be at special risk such as employees working individually or new hire trainees

3.0 Risk Management

The requirement to assess all risks to health safety and the environmental arising from work Forms an important part of current legislation and provides the basis for loss control in most Progressive organizations PPIME EGYPT will utilize a risk assessment system to ensure the

Proper analyses of the all work situations are evaluated and all noted risk are identified

3.1. Line Managers Responsibility

The line managers are responsible to ensure all hazards present within a work area have Been identified and then evaluate the extent of the risks involved taking into account the Control measures that are already in place detailed guidance is given in the risk Assessment module of this manual

3.2. Review

The line manager HSE coordinator will review assessments not to exceed 1 year from the Assessment of last review this ensures the assessment is regularly brought forward and Checked to make sure it is still valid.

3.3. Health Surveillance

The risk assessment and review strategy adopted at PPIME EGYPT will identify those circumstances where health surveillance is required. Detailed guidance on this issue can be obtained from the company physician.

4.0 Healthy and Safe Operations

4.1. Housekeeping tours

Line managers from the appropriate department should include in their HSE activity plan An aide memoir sheet is attached and should
Be returned to the Project Manager where records will be kept.

4.1.1. Housekeeping Checklist

HOUSE KEEPING CHECKLIST		
AREA:	INSPECTED BY:	DATE:
SUBJECT	COMMENT	ACTION
Are fire escape routes well sign posted?		
Are fire escape routes kept clear?		
Are there any obvious unsafe acts or conditions?		
Are floors free from sliPPIMEng and triPPIMEng hazards?		
Are cupboard/cabinet tops above eye level free from stored materials?		
Are there any overloaded, top heavy cabinets, shelves or drawers?		
Are hand tools in good condition?		
Is the area orderly arranged with desks, cabinets, benches and stored materials?		
Is the waste disposed of frequently orderly and safely?		
Are washrooms clean and tidy with soap and towels?		
Is electrical wiring tidy & in apparent good condition?		

4.2. Site Inspections

Planned general inspections are a key element of PPIME EGYPT HSE Management system if carried out correctly they will identify unsafe conditions and unsafe work practices hazards and dangerous conditions in the work place must be identified and action taken the working practices should also be monitored for compliance with permit conditions and with local HSE procedures.

Blank inspection pro formas for use in office and process areas are available from the safety department and examples of both are attached

4.2.1. Inspection Checklist-Offices

INSPECTION CHECKLIST -OFFICES		
AREA	INSPECTED BY	DATE
ISSUE	COMMENTS	ACTION
AISLES AND PASSAGEWAYS		
-obstructions		
-slips & trips		
-emergency route/exit		
ELECTRICAL		
-plugs		
-sockets		
-cables		
-Equipment		
LIGHTING		
-Aisles &passageways		
-Workstations		
MANUAL HANDLING		
-Assessment		
-load		
FIRE AND EXPLOSION		
-procedures		
-Muster marshals		
-Extinguisher and hoses		
WORKSTATION		
-DSE assessment		
-posture		
-Glare and reflection		
-task layout		
HAZARDOUS SUBSTANCES		
-Assessments		
STORAGE		
-cabinets/shelves		
-falling objects		
INFORMATION		
-safety signs		
-posters		
-Minutes of meetings		
THERMAL COMFORT		
-Temperature		
-Ventilation		
-Housekeeping		

4.2.2. inspection Checklist -Workplace

INSPECTION CHECKLIST- WORKPLACE		
AREA:		DATE:
INSPECTION TEAM		
ISSUE	COMMENTS	ACTION
WORKPLACE CONDITIONS		
1.Housekeeping		
2.Floors(walking and working)		
3.Aisles and Passageways		
4.Roadways(sand,harstanding,etc)		
5. stairs		
6.Working platform/access equip		
7.Exits(including emergency)		
8. Ventilation (incl.Air con.)		
9.Heating		
10.Noise		
11.storage and staking		
12.shelving conditions		
13.labeling and storage(haz.sub)		
14.Lighting		
ISSUE	**COMMENTS**	**ACTION**
EQUIP.& FACILITIES-MECH		
1.Emergency shutdown notices		
2.Alarm system(inc.check proceed)		
3.labeling of services		
4.supply isolation		
5.Cross connection of supplies		
6. interting equipment		
7.lifiting equipment		
8.fume Extractors		
9.Guards		
10.Hand and portable tools		
11.pressure systems		
12.Mechanical power systems		
13.Hydraulic power systems		
14.valves		
EQUIP.& FACILITIES-ELEC		
15.Current/valid Inspections/test		
16.Isolation Facility		
17.portable electric equipment		
18.Labeling of switch boxes		
19.Earth leaking circuit breaker test		
20.high voltage procedures		

INSPECTION CHECKLIST-WORKPLACE		
AREA		DATE
INESPECTION TEAM		
ISSUE	COMMENTS	ACTION
CHEMICALS AND SOLVENTS		
1.Stock minimized		
2.labeling		
3.storage facility(toxic/flammable)		
4.chlorinated solvent stock		
5.COSHH assessment		
6.MSDS		
GAS SUPPLIES &SERVICES	COMMENTS	ACTION
1.Compressed air		
2**.Compressed nitrogen**		
3.compressed oxygen		
4.compressed acetylene		
5.compressed LPG		
6.Gas rigs(regulators,gauges,etc)		
7.cylinder storage		
8.cylinder handling		
9.labeling and marketing of cylinders		
10.Electricity(sockets/extensions,etc)		
11.welding equipment		
12.water quality		
EMERGENCY PREPAREDNESS	COMMENTS	ACTION
1.First aid equipment		
2.Fire alarms		
3.fire extinguishers		
4.Emergency response team		
5.Emergency procedures& training		
6.plant evacuation and muster		
7.Eye wash		
8.shower		
PPE	COMMENTS	ACTION
1.Eye production		
2.Hearing protection		
3.Respiratory Protection		
4.head protection		
5. hand protection		
6.Foot protection		
7.body protection		
8.Training and instruction		

INSPECTION CHECKLIST- WORKPLACE		
AREA:		Date
INESPECTION TEAM		
ISSUE	COMMENTS	ACTION
SAFETY RULES		
1.general safety rules		
2.Hse manual		
3.COSHH assessment		
4.operating procedures		
5.PPE rules and areas		
6.other local rules		
7.isolation procedures		
8.safety signs		
9.Permit procedures		
10.staff training		
11.lone working arrangements		
12.Unattached operations		
WASTE MANAGEMENT, DISPOSAL & ENVIRONMENT		
1.Waste minimized		
2**. Waste bins Provided**		
3.waste oil procedure		
4.waste disposal procedure		
5.Environmental emissions		
ADDITIONAL COMMENTS		

4.3. Statutory Examinations

Examples of equipment subject to statutory examination and test include pressure vessels; portable hand tools, lifting equipment and local exhaust ventilation systems. The appropriate department should maintain lists of such equipment.
Line managers should check these lists and examination documentation annually.

5.0 Environmental Protection

Line managers must ensure that all environmental impacts potentially arising from activities under their control are identified assessed and minimized including noise, discharges to air, water and ground.
The key elements applied to the environment are:

- Improvement of site environmental performance as detailed in the site minimum requirements
- Staff awareness and training
- Assessment of risks and environmental impacts
- Practicable application of pollution controls in response to risk assessment

Environmental risk assessment is included in the Risk Assessment inventory included in the exploration and production environmental module.

Routine environmental checks are also included in the Planned Inspection Pro forma included in this section.

6.0 Management of Change

The Management of change is a recognized and much used loss prevention procedure; it was instigated after several serious accidents were found to be directly caused by lack of management control of change. In PPIME EGYPT line managers are accountable for ensuring that the HSE implications of any change, either temporary or permanent, are fully considered before implementation.

- An engineering modification to a plant needs to be fully communicated to those people who maintain and operate the equipment.
- The restructuring or changing of manpower organization will require good communications

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ith all parties involved.

Changes should be designed, planned and implemented in a structured manner using the following basic process:

Assessment → Appropriate Authorization → Structured Implementation → Update Records

Procedures for Management of Change appear in the PPIME EGYPT Management of Change HSE Module. Managers may also wish to keep a record of changes. A form for this purpose is attached.

7.0 Third Party interface

A definite duty in PPIME EGYPT exists to ensure that information on HSE risks is exchanged With contractors

Line managers should:

- Review contractors method statements prior to the commencement of work
- Provide contractors and temporary employees working within their area with a copy of the guidelines for contractors booklet proper briefing on local HSE risks and instructions on the permit to work system action to take in an emergency and on the site smoking policy
- Asses the impact of contractors activities on normal work activities

Records of instruction given to contractors will be retained in the project office a blank pro Form a is attached for information the contractor signs the form to acknowledge receipt of The guidelines for contractors' booklet and the other instruction given

7.1. CONTRACTOR AND TEMPRORY EMPLOYEE HSE INSTRUCTION RECORD

CONTRACTOR AND TEMPRORY EMPLOYEE HSE INSTRUCTION RECORD		
SAFETY INDUCTION CHECKLIST		
Detail point		
1.0 Literature		
1.1 guidelines for contractors		
1.2 PPIME EGYPT safety and environmental Manual		
2.0 Local hazards		
2.1 Hazards areas		
2.2 weather conditions		
2.3 dangerous animals		
2.4 Water details		
2.5 Vehicle entry		
3.0 Permit to work system		
3.1 General rules and procedures		
3.2 hot work permits		
3.3 cold work permits		
3.4 confined space entry permits		
3.5 Excavation permits		
3.6 Other permits		
4.0 Emergency procedures		
4.1 Fire alarms		
4.2 Location of fire extinguishers		
4.3 Actions in case of fire		
4.4 smoking policy		
5.0 Other		
5.1 personal protective equipments requirements		
5.2 Requirements for plant and equipment		
5.3 lay down areas		
5.4 Fabrication areas		
5.5		
5.6		
5.7		

NAME COMPANY	NAME COMPANY
1.	6.
2.	7.
3.	8.
4.	9.
5.	10.

CONTRACTOR NAME---------- PPIME EGYPT
REP----------
SIGNATURE ----------SIGNATURE----------
DATE----------DATE----------

8.0 INCIDENT REPORTING AND INVESTIGATION

PPIME EGYPT will use the accident reporting systems as detailed in part 3 section 7 of the HSE policy manual

It is however the duty of the PPIME EGYPT management to review these reports periodically looking for trends that repeat or common cause this information together with lessons learnt from the analysis of these reports will assist in the identification of future additional HSE activities

9.0 Emergency Preparedness

The facilities have a major incident plan which is designed to deal with all foreseeable major incidents that may occur at any site together with business recovery plans Examples include incidents that may occur at any site together with business recovery plans Examples include major explosions or fire large uncontrollable escape of toxic/flammable gas a helicopter crash or a shiPPIMEng incident

It is the line manager's responsibility to ensure that the plan is kept up to date and that it is tested and reviewed at regular intervals line managers should ensure that information on the plan is made available to staff and forms part of induction training

HEALTH, SAFETY AND ENVIRONMENT MANAGEMENT PROGRAM

PART 3

HSE GUIDELINES

PART 3

HSE GUIDELINES

Contents

3.0 Healthy and Safe Operations

4.1. HSE Meetings

4.1.1. Scheduled HSE Meetings
4.1.2. Pre-Job HSE Meetings

4.2. Personal Protective Equipment

4.2.1. General
4.2.2. Head Protection
4.2.3. Eye Protection
4.2.4. Foot Protection

4.2.5 Hand protection
4.2.6 Hearing Protection
4.2.7 Protective clothing
4.2.8 Fall protective

4.2.8.1. Working above six feet
4.2.8.2. Inspection of fall protection Equipment
4.2.8.3. Ladders

4.2.9 Respiratory Protections
4.2.10 Personal Flotation Devices

4.3. Transportation

4.3.1 Vehicles
4.3.2 Vessels
4.3.3 Helicopters

4.4. Offshore Safety

4.4.1 Swimming Requirements
4.4.2 Personnel Entry Into water
4.4.3 Boat-Platform Transfers
4.4.4 Fire and Abandonment Drills

4.5. Permit to Work

4.5.1 General
4.5.2 Work Permit
4.5.3 Job Safety Analysis/Job Hazard Analysis

4.6. Process Safety Management

4.6.1 General

4.7. General Operations

4.7.1 Lifting of loads by personnel
4.7.2 Lock/out tag
4.7.3 Confined space Entry
4.7.4 Electrical Safety
4.7.5 Operating Equipment
4.7.6 Crane and Rigging Safety

4.7.6.1. Procedures for tag lines

4.7.7. Use of Hand and Power Tools

4.8. Hazardous Materials

4.8.1. Hazardous Communication/MSDS
4.8.2. Hydrogen Sulfide

4.9. Auditing

4.9.1. Short sleeve Employee
4.9.2. Site Inspections
4.9.3. Statutory Examinations
4.9.4. House keeping Inspections

5.0 Environmental Protection

5.1. General

5.1.1. Environmental Risk Assessment
5.1.2. Pollution Control
5.1.3. Waste Management

6.0 Management of change

6.1. General

7.0 Third Party Interface

7.1. Contractors and site Visitors
7.2. PPIME EGYPT site-Minimum Standards
7.3. Suppliers and Contractors

7.3.1. Assessment and Selection
7.3.2. Engagement of Contractors
7.3.3. Supervision of suppliers
7.3.4. Training

PART 3

Guideline 1

INTRODUCTION

Contents

1.0 Introduction

1.1 purpose of health safety and environmental management

1.1.1. Guidelines

- To provide a management guide to all employees of PPIME EGYPPT
- Describe HSE process of PPIME EGYPT
- Describe the HSE responsibilities to clients and employees
- To promote and support a safe and healthy environment which improves continuously
- To ensure legislative compliance and maintains audit records

1.1.2. Measurement

- To define individual HSE responsibilities
- Sets targets for improvements and measurement
- To set standards for awarding employees for HSE performance
- To demonstrating commitment in HSE matters and ensuring that HSE risks are controlled and communicated
- For management to operating in accordance with PPIME EGYPT HSE policy principals
- To controlling the effectiveness of personnel and training programs

1.1.3. To ensure that plans are in place for all level of emergencies and these are regularly tested the most important of these being the major incident plan

1.2. Description of health safety and environmental Management Manual

1.2.1. General

The HSE Manual is divided into three sections:

- Policy principals and implementation strategy
- Management guide

- Detailed procedures
- HSE forms

1.3. Revisions

1.3.1. General

The manual is under constant review and development updates are Proposed and authorized by the corporate HSE committee

PART 3

GUIDELINE 2

TRAINING

Contents

2.0 Training

2.1. General

The HSE coordinator/line Managers will coordinate all safety training to personnel this Should be addressed formally every year to review priorities and address special need Line managers will review training records at regular intervals (quarterly) to ensure Actions are completed and look at individual training needs the safety-training subject Are listed in section 11

A data base of employee training records will be maintained on the computer at the Lagos corporate office

All new field employees must receive induction training from the appointed supervisor An employee induction checklist (following) should be prepared and included in the Personnel file for each newly inducted employee

PART3
GUIDELINE 3

RISK Management

CONTENTS

3.1. General

The requirement to assess all risks to health safety and the environment arising from work forms an important part of current legislation and provides the basis for loss control in most progressive organizations PPIME EGYPT will utilize a risk assessment system to ensure the proper analyses of the all work situations are evaluated and all noted risk are identified

3.1.1. line managers responsibility

- operating in accordance with PPIME EGYPT HSE policy principals
- ensuring all hazards within the work environment have been identified
- evaluate the extent of risk involved

3.1.2. Review of risk

The line manager and HSE coordinator will review assessments not to exceed one (1) year from the assessment or last review this ensures the assessment is regularly brought forward and checked to make sure it is still valid

3.1.3. Health surveillance

The risk assessment and review strategy adopted at PPIME EGYPT will identify those circumstances where health surveillance is required detailed guidance on this issue can be obtained from the company physician

PART 3

GUIDELINE 4

HEALTH AND SAFETY OPERATIONS

Contents

4.3. Transportation

- 4.3.1. Vehicles
- 4.3.2. Vessels
- 4.3.3. Helicopters

4.4. Offshore safety

- 4.4.1. Swimming Requirements
- 4.4.2. personnel entry into water
- 4.4.3. boat-platform transfers
- 4.4.4. fire and abandandoment drills

4.5. Permit to work

- 4.5.1. General
- 4.5.2. work permit
- 4.5.3. job safety Analysis/job hazard analysis

4.6. Process safety management

- 4.6.1. General

4.7. General Operations

- 4.7.1. Lifting of loads by personnel
- 4.7.2. lock/out tag
- 4.7.3. Confined space entry
- 4.7.4 Electrical Safety
- 4.7.5. Operating Equipment
- 4.7.6. Crane and rigging safety
  - 4.7.6.1. Procedures for tag lines
- 4.7.7. Use of hand and power tools

4.8. Hazardous Materials

- 4.8.1. Hazardous communication /MSDS
- 4.8.2. Hydrogen sulfide

4.9 Auditing

- 4.9.1. Short sleeve Employee
- 4.9.2. Site inspections
- 4.9.3. Statutory examinations
- 4.9.4. Housekeeping Inespections

4.0 Health and safety operations

4.1. HSE Meetings

4.1.1. scheduled HSE Meetings

Regularly scheduled (minimum monthly) HSE meetings shall be attended by all personnel. Topics may include HSE issues; regulatory issues; HSE training; HSE trends that have been identified; etc a record of these meetings shall be kept that includes date location names\signatures of attendees and topics covered

4.1.2. pre-job HSE Meetings

A pre-job or pre-task HSE meeting shall be conducted on-site prior to beginning all work in which the specific hazards pertaining to the job are discussed additional meetings may be required throughout the same day in the event a non-routine job is performed in order to review a JSA or work permit prior to beginning a specific task or in the event a change in job scope occurs everyone shall attend and participate in all HSE meetings unless specifically instructed otherwise a record of these meetings shall be kept that includes dates location names\signatures of attendees and topics covered

Suggested topics for a pre-job HSE Meeting:

- tasks – discuss the task and job steps
- PPE - discuss what PPE is needed for the job
- Responsibilities – establish who has the overall responsibility for the job and ensure that each individual understands their assignment
- Skills – if special job skills are needed for a task ensure proper training has been provided discuss SSE's and how they will be managed
- Emergency evacuation – discuss gather-up point evacuation route nearby hospitals who are the first responders etc
- Environment – discuss weather (heat,cold,wind,lightning,etc) and location hazards such as snakes insects uneven walking surfaces etc
- Hazards – discuss any location or job hazards not previously discussed in other portion of HSE meeting or during review of JSA or work permit
- Equipment – discuss any special tools that will be needed for a task and the HSE aspects of their usage including proper PPE

- Materials – discuss HSE aspects associated with materials including proper PPE and review MSDS if appropriate
- Conflicting activities – discuss other activities or simultaneous operations (SIMOPS)that may affect the operation

4.2. Personal protective equipment

4.2.1 General

All employees shall wear appropriate personal protective equipment(PPE) it is the responsibility of each person to wear PPE as required by the specific task being performed the potential hazards that person will be exposed to and the

Specifics of the job site PPE requirements as recommended on material safety data sheets (MSDS) for material being handled shall be strictly adhered to in addition all employees shall wear a shirt and long pants at all times **tank tops sleeveless shirts and short pants or cutoffs are not permitted** loose or floppy clothing are prohibited around rotating or moving equipment rings neck chains or loose jewelry shall be removed while engaging in manual labor

4.2.2 Head protection

An approved ANSI Z89.1 class B (plastic) hard that shall be worn by all employees working in field operations at all times except while in vehicles living quarters offices and control rooms

4.7.1. Eye protection

Safety glasses with side shields shall be worn by all employees working in field operations at all times except while in vehicles living quarters offices and control rooms all eye protection must comply with ANSI Z87.1during night operations only clear or amber colored safety glasses shall be worn contact lenses may be worn however safety glasses with side shields are required OSHA doesn't allow contact lenses to be worn while using respirator

When performing work where safety glasses do not provide adequate protection such as use of high-pressure washer handling chemicals etc other appropriate eye protection such as goggles etc shall be worn hard hats with full-face shields will be required for all buffing and grinding operations

4.7.2. Foot protection

Steel toe or a non-conductive (electrician's) safety toe shoes or boots with no-skid soles shall be worn by employees working in field operations at all times except while in vehicles living quarters offices and control rooms all safety toe foot wear must comply with ANSI Z4.1.1.

4.2.6 Hand protection

Appropriate gloves shall be worn when the hands are exposed to hazards such as cuts punctures or abrasions (cloth, leather or leather-palmed gloves) when handing chemicals or hazardous materials where absorption in a concern (rubber gloves); and when performing electrical work (certified gloves for electrical work)

4.7.3. Hearing protection

Hearing protection shall be worn in all high noise areas or wherever a high-noise warning sign is posted

4.7.4. Protective clothing

Special protective clothing shall be worn when handling chemicals or in other hazardous situations as specified by the material safety data sheets (MSDS) clothing worn while working in live electrical equipment shall be 100% cotton wool or a cotton-wool blend

4.2.8 Fall protection

Fall protection equipment shall be worn when working or climbing more than six (6) feet above an established working surface (ground deck or water level) when specified on a warning sign or when an immediate danger exists below the working surface regardless of height and no guard rails are present all components of the fall protection system must comply with ANSI Z359.1

4.2.8.1. Working above six feet

Any employee working or climbing more than six (6) feet above an established working surface (ground deck or water level) shall use one of the following means for primary fall protection:

- The preferred system of primary fall protection consist of (a) a full body harness;(b) shock absorber (c)clevis with cotter pin locking device or snap hooks with an inward moving self-closing and self-locking keeper (latch or gate) so that keeper remains closed and locked until unlocked and pressed open for connection or disconnection and(d) nylon lanyard(steel or rope lanyards are not allowed)attached to a stationary support the lanyard will be attached to a stationary support in manner that will prevent a free fall of more than six(6) feet or even less than six(6)feet if an immediate danger exists below the working surface regardless of height
- A retractable lifeline (inertia reel) attached to a full body harness may be used with appropriate approval
- A cable-grabbing device attached to a static line may be used with appropriate approval

When ascending or descending a derrick ladder and using the derrick climbing line run through a fall arresting device and connected to a counterweight the derrick belt must be used in conjunction with the full body harness the derrick belt should be worn over the full body harness and attached to the derrick climbing line

4.2.8.2. Inspection of fall protection equipment

Fall protection devices such as full body harnesses lanyards static lines with cable-grabbing device inertia reels etc shall be inspected before each use and replaced if necessary fall protection equipment which has been involved in a fall shall be replaced

Full body harness and lanyards shall be kept clean and never be laid down in drilling mud water dirt etc all fall protection equipment shall be placed in a proper storage area when not in use only approved cleaning products for full body harnesses and lanyards shall be used in order to not diminish the rated capacity of the device

4.2.8.3 Ladders

A ladder should always be used to reach objects or areas not readily accessible to the employee's reach

- All ladders shall be inspected before use any damaged or unsafe ladders shall be tagged and taken out of service stationary ladders

With missing broken or loose steps shall be taken out of service until repaired

- Both shall be kept free for climbing descending and performing work on ladder no carrying of hand tools grease guns etc while climbing on ladder articles which are too large to be carried in a pocket or on a belt shall be lifted and lowered by a hand line employee should not rush and should only take one step at a time
- Only one person at a time shall be on the ladder
- Portable ladders shall have anti-slip safety feet and be secured at the top before work begins in order to prevent the ladder from shifting a second employee should hold the ladder until the climber can secure it at the top in addition portable ladders should be set at the correct angle (1 foot out at bottom for every 4 foot of ladder height) to ensure stability
- Only ladders that are not electrically conductive(wooden ladders or ladders with fiberglass rails) shall be used to perform electrical service work

4.2.9. Respiratory protection

Respiratory protection shall be worn when working in areas where respiratory hazards exist and are not controllable by other means some respiratory hazards which may be encountered include hydrogen sulfide (H_2S) chlorine galvanized pipe welding sand blasting or insulation work where Man Made Mineral Fibers (MMMF) and asbestos may be present

The following requirements must be met by employees who will be using respiratory protection : (a)employee shall meet medical requirements for using this equipment (b)employee shall receive training on the proper use fit and maintenance of this equipment (c) employee shall not have facial hair that will interfere with the seal of the face piece (d) employee shall not wear eye glasses that interfere with the seal of the face piece and (e) employee shall not wear contact lenses while using respirator

4.2.10. personal flotation devices

personal flotation devices (PFD's) such as life jackets or work vests shall be worn and properly secured at all times by personnel riding in a boat making boat\platform transfers and working in areas above water (such as barges bottom walkways and decks of platforms etc) without guard rails personnel riding in a helicopter over water shall wear inflatable PFD's referred to as Mae West type life jackets belt pack type inflatable life jackets are not authorized for passengers on helicopters

4.3. Transportation

4.3.1 vehicles

PPIME employees driving a vehicle used for company business shallhave a valid driver's license and use defensive-driving techniques at all times all vehicle occupants shall wear seat belts and all posted signs obeyed when driving

Driving while under the influence of alcohol or other drugs is prohibited

4.3.2. Vessels

PPIME employees shall follow the instructions of the boat captain on loading\unloading procedures luggage storage cargo seating arrangements and smoking restrictions the captain has the authority to refuse passage to anyone he\she considers to be unsafe passenger all boat passengers shall walk (not run) on the boat's deck keep one hand free for support and wear a personal flotation device (PFD) when getting on or off the boat

4.3.3. Helicopters

PPIME employees shall follow the instructions of the dispatcher HLO\SES and pilot at all times A helicopter pre-flight HSE orientation shall be conducted prior to flying offshore the helicopter shall not be approached until a signal is received from the pilot HLO\SES or dispatcher always approach and disembark the helicopter from the side for the SK-76helicopter and from the forward left or right side of other types of helicopters never walk behind the aft cargo compartment and never walk under the helicopter tail boom watch and crouch down when under the turning rotors and remain clear of the tail rotors at all times. Never use the emergency exit from the heliport unless it is a real emergency all helicopter passengers shall walk (not run) to or from the helicopter wear your seat belt tight around your hips during flight wear hearing protection and the Mae West inflatable life vest

No hazardous material shall be carried on the helicopter unless the proper paperwork has been completed and the pilot has been notified of the material

Exhibit 7. Helicopter Danger Areas

4.4. Offshore Safety

4.4.1. Swimming Requirements

PPIME requires all personnel going to water locations to be able to swim or to have successfully completed an industry-accepted training for swimming or water survival. Water survival training can be taken by swimmers or non-swimmers alike. The training equips an individual with the basic skills to survive in the water for a sufficient amount of time to allow rescue. All personnel will! Be required to sign a roster attesting they are able to swim and that their employer has instructed them about the hazards and proper work practices specific to working offshore in the oil industry.

4.4.2. Personnel Entry into Water

Entry into the water shall be permitted only when:

- A diver is to perform specified work.
- An abandon platform order is given.

If rescuing a person in the water when there are no other reasonable alternatives, the person performing the rescue should first remove shoes and excess clothing, wear a personal flotation device (PFD), and attach a lifeline. Other persons should be in place secure the lifeline.

4.4.3. Boat-Platform Transfers

Personnel transferring between boats, platforms, and rigs shall wear a personal flotation device (PFD). Transfer by personnel basket and/or swing rope shall not be permitted without receiving proper training and an on site orientation on me transfer. Personnel shall not board unlighted platforms or structures at night except when the accompanying boat is equipped to adequately illuminate the boarding operations.

4.4.4. Fire and abandonment drills

Emergency drills should be conducted on platforms once each month for each shift records pf these drills shall be maintained at the facility

4.5. permit to work

4.5.1 General

PPIME Egypt utilizes a permit-to-work (PTW) process on routine and non-routine work activities to ensure hazards and risks associated with these activities are identified and safeguarded the PTW process is a comprehensive process for analyzing planning authorizing and executing work in a manner to prevent HSE incidents and is much more than simply issuing permission to conduct certain jobs

4.5.2. Work permit

One of the key tools utilized in the PTW process is the work permit which is a written document that authorizes identified personnel to conduct certain work activities within designated boundary conditions such as time place and the specific work steps required to ensure the job is completed in a manner to prevent HSE incidents the work permit will generally be issued on a daily basis and re-issued at a shift\tour change or significant change in hazard classification of job assignment consult the company representative for those work activities that shall require a Work Permit as well as those activities which may require a Work Permit depending on special situations such as simultaneous operations

The work permit document shall contain the following at a minimum:

- **When** the specified work will begin (date\time) and end and\or when a new permit will be required (date\time) A formal hand-over procedure must be in place for when work

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ermits are issued for periods longer than one shift\tour and\or when work permit authorization changes

- **Who** the permit is issued to (including company and individual's name)
- **Where** the specified work will take place
- Full description of **what** work will be performed including proposed tasks and objectives and description of equipment to be used
- Special consideration for safeguarding short service employees(SSE's)
- Description of all major hazards which could be encountered during the job as well as documentation of appropriate controls of each hazard identified
- PPE necessary for specified work that will take place
- Identify specific standards\procedures\guidelines that are applicable to work that will take place
- Jobs involving permit-required Confined Space Entry (PRCS) Lockout\Tagout (LOTO) excavation and trenching or hot work will generally require additional documentation
- Contingency plan if work doesn't proceed as planned.

- Actions to be taken in the event of an HSE incident including appropriate emergency response and notification phone numbers for operators.
- Reference to all other activities that may be impacted by work, which will be performed (including other Work Permits) to ensure alignment and coordination.
- Signatures of all workers who have reviewed the Work Permit and agree to meet all the operational and HSE requirements.
- Final documentation and formal hand-over procedure declaring the work has been completed and the job site left with no HSE issues or problems and ready to return to service.
- Need to provide for the suitable display of Work Permits.

4.5.3. Job Safety Analysis/ Job Hazard Analysis

Another key tool to the process, besides the Work Permit, is the Job Safety/Hazard Analysis (JSA/JHA). The JSA/JHA also helps ensure appropriate precautions and procedures are employed to eliminate or minimize identified HSE hazards and risks for activities conducted. The JSA/JHA is a process for discussing and documenting each step of a job, identifying the existing or potential HSE hazards and then determining the best way to perform the job to reduce or eliminate the hazards. JSA/JHA are effective tools to be used for jobs that will take place even when a Work Permit is not required.

4.6. Process Safety Management

4.6.1. General

PP1 EGYPT will be informed if a facility is covered under OSHA Process Safety Management (29 CFR 1910.119). Site-specific hazards will be discussed with the company before work begins. Under this guideline PP1 is responsible to see that their employees are

trained to perform their jobs safely, and have been instructed in the process hazards and emergency action plans for the facility. PPIME EGYPT shall maintain documentation of employee training. Documentation shall include employee identification, training dates, and description of the training and the means used to verify the employees understanding.

4.7. General Operations

4.7.1. Lifting Of Loads by Personnel

Back injuries may result from improper lilting techniques. Lifting a load that is loo heavy, or lilting in the wrong position, can cause an injury.

Follow these guidelines to lift safely:

- Make sure the area is clear of triPPIMEng hazards.
- Face the load you're about to lift.
- Bend your knees.
- Keep the load close to your body.
- Keep your back straight

- Use your legs, not your back, to lift the load.
- Do not twist your body while carrying a heavy load.
- Do not try lifting a load that is too heavy - ask for help.
- When lifting a load with another person(s), communicate with the other person(s) before lowering your end of the load.

4.7.2. Lock/ Out Tag

Lockout/ Tag out is a procedure required by OSHA to isolate personnel from all potential energy sources when performing maintenance or service on equipment; especially when that maintenance or service requires the disabling or removal of normal guards and safety devices. Potential energy sources include electrical, mechanical, pneumatic, hydraulic, thermal, and chemical and all forms of potential stored energy.

Lockout/ Tag out Procedure:

- PPIME EGYPT employees shall share information prior to the start of the work requiring Lockout/ Tag out to make each other fully aware of the other's Lockout/Tag out to make each other fully aware of the other's Lockout/ Tag out procedures.

- Repairs, service or alterations shall not be made on equipment in operation. All equipment shall be shut down and a Lockout/Tag out device used in such a manner that the equipment cannot be accidentally started while being worked on. The

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ower switch of the equipment to be worked on s Locked out/Tagged out.

- To ensure the equipment has been properly locked out of service prior to starting any work, a qualified person shall attempt to turn on the source to ensure the equipment does not become energized.

Drilling/ Work over Rig Specific- Before equipment is unplugged or plugged into a power distribution panel, the power source shall be locked out/Tagged out. This includes all equipment that is unplugged or plugged into the SCR distribution panel during rig moves

- Examples of equipment repairs or maintenance that require Lockout/Tag out procedures include, but are not limited to, those listed below. Consult your supervisor or the company representative for site-specific work requiring Lockout/Tag out procedures.
  - ◊ Changing filters.
  - ◊ Pump repairs or changing swabs/liners.
  - ◊ Repairs to paddles in tanks or cleaning of tanks with paddles.
  - ◊ Maintenance on the rig draw works such as adjusting the brakes, greasing, inspections, etc.
  - ◊ Generator repairs.
  - ◊ Compressor repairs.

4.7.3. Confined Space Entry

Each job site will detail a complete list of areas designated as a “confined space hazard”. No person shall enter into these areas without another proper assistance and notification.

4.7.4. Electrical Safety

Each PPIME job site shall address and minimize personnel exposure to electrical hazards through effective equipment operation, design, specification, installation, and maintenance.

All electrical work shall be done in accordance with the latest codes, standards, and regulations including, but not limited to: National Electric Code (NEC), OSHA subpart S. National Electrical

Safety Code (NESC) and any federal, state, or local standards. Hazardous electrical work shall only be done by qualified electricians using proper PPE. PPE must comply with OSHA 29 CFR 1910.137.

A qualified person shall discharge all stored electrical and shall verity the equipment is de-energized and proper Lockout/Tagout procedures implemented prior to beginning electrical work.

4.7.5. Operating Equipment

Operating equipment typically refers to rotating or reciprocating equipment such as compressors, pumps, pumping units, etc.

The following are requirements to minimize the possibility of an HSE incident during the repair, service, startup, etc, of the operating equipment:

- Only trained operators shall start and stop operating equipment.
- Jewelry such as rings, watches, wrist chains, or key chains or loose clothing shall not be worn when working around operating equipment. Long hair shall be confined.

Repairs, service or alterations shall not be made on equipment in operation. All equipment shall be shut down and a Lockout/Tag out device used in such a manner that the equipment cannot be accidentally started while being worked on.

- Guards and other safety devices shall be reinstalled before equipment is operated

4.7.6. Crane and Rigging Safety

Only trained and qualified personnel shall operate cranes and gin pole trucks. All work utilizing cranes shall be done in accordance with OSHA 29 CFR 1910. Only PPIME approved personnel shall be allowed to operate company owned cranes all cranes shall be strictly maintained in accordance with the manufacturer's recommendations

The following are requirements to minimize the possibility of an HSE incident during crane and rigging operations:

- All personnel shall be clear of a load before it is picked up and shall remain clear at all times. Personnel should face the crane or gin pole truck in full view of the crane operator and/or signalman. Personnel, including those holding the tag line, shall never be under suspended loads or go between the load and other objects where they may be trapped or crushed.
- The crane operator shall never leave the controls while a load is suspended.
- Non-conducting tag lines shall be used to control all suspended loads. Chains or steel cables are not acceptable. Tag lines shall be attached before a load is lifted.
- A signalman shall be used if the crane operator does not have full view of lifting operation. Where practical, the use of radios or other communication equipment is also recommended. The crane operator shall respond only to signals from the signalman, but shall obey a stop signal from anyone at any time.
- The crane operator shall inspect lift lines, rigging, slings and crane and gin pole

fittings/faste
ners daily when in use or prior to each lift and replace if necessary. This equipment shall be properly rated for the intended load and certification tags attached to all slings. All wire rope clamps shall comply with OSHA 29 CFR 1926.251. Wire rope shall not be secured with knots.

- The operator shall inspect all cranes and gin pole trucks prior to use. Cranes should be load marked per OSHA 29 CFR 1910.179. In addition, cranes shall have the most recent inspection records posted in the cab.
- A crane shall nut be used to pull a load sideways.
- A crane boom shall not be used as a ladder for walking, except for necessary maintenance of the boom and its components.
- For rigging, never use a chain when it is possible to use a wire rope.
- Determine the load weight before rigging it and do not exceed the safe working load of any equipment.
- Before being unhooked, all loads shall be safely landed and properly blocked.
- Wire rope slings and chain shall never be shortened by tying knots in them or by wraPPIMEng them around the crane hook. Protruding ends of strands in splices on slings shall be covered or blunted.

- Signs shall be protected from sharp edges by blocking or protective pads
- When multi-leg slings are used each leg of the sling should be loaded evenly
- Kinked wire rope slings shall be removed from service wire rope shall be kept lubricated and free of corrosion

4.7.6.1. Procedures for tag lines

- If tag lines are impractical during final positioning of the load caution should be taken to ensure that no part of the persons body guiding the load be between the load and other objects where they may be trapped or crushed
- No attempt to guide a load shall be made with the tag line wrapped around a hand or waist
- The tag line must be free of knots
- A tag line shall be sufficient length so that no part of the person guiding the load shall be under the load at any time

Hoist with fore arm vertical fore finger pointing up move hand in small horizontal circle	Lower with arm extended down ward forefinger pointing down move hand in small horizontal circle	Use main hoist tap first on head then use regular signals

Use whip line (Auxiliary Hoist) tap elbow with one hand then use regular signals	Raise boom arm extended fingers closed thumb pointing upward	Lower boom arm extended fingers closed thumb pointing downward
Move slowly use one hand to give any motion signal and place other hand motionless in front of hand giving the motion signal (hoist slowly shown as example)	Raise the boom and lower the load with arm extended thumb pointing up flex fingers in and out as long as load movement Is desired	Lower the boom and raise the load with arm extended thumb pointing down flex fingers in and out as long as load movement is desired

Swing arm extended point with finger in direction of swing of boom	Stop arm extended palm down move arm back and forth horizontally	Emergency stop both arms extended palms down move arms back and forth horizontally

Travel arm extended forward hand open and slightly raised make pushing motion in direction of travel	Dog everything clasp hands in front of body	Travel (both tracks) use both fists in front of body making a circular motion about each other indicating direction of travel forward or backward (for land cranes only)
Travel (one track) lock the track on side indicated by raised fist travel opposite track in direction indicated by circular motion of other fist rotated vertically in front of body (for land cranes only)	Extended boom (telescoping booms) both fists in front of body with thumbs pointing out ward	Retract boom (telescoping booms) both fists in front of body with thumbs pointing forward each other

4.7.7. Use of Hand and Power Tools

Tools shall be maintained in good condition and defective tools repaired by qualified personnel or replaced. Where potentially explosive atmospheres exist, explosion-proof and non-sparking tools and extension cords shall be used.

Hand tools shall always be used for their intended purpose. For example, wrenches shall not be used as a hammer; screwdrivers shall not be used as a chisel or pry bar; pipe wrenches shall not be used on hex nuts; grinder wheels shall be properly rated for the speed of the grinder; etc. Guards shall be in place and not modified. Power tools and extension cords shall have proper grounding. **Refer to API-RP 14F.10.3**4.8. Hazardous Materials

4.8.1. Hazard Communications/MSDS

The purpose of the HAZCOM / MSDS program is to ensure that all known potential hazards of substances used or present at the work place are communicated to all PPIME employees. All contractors are responsible for training their employees on the OSHA Hazard Communication Standard (29 CFR 1910.1200).

Recommended Compliance Procedures:

- Labeling containers and providing information regarding hazards associated with unlabeled containers.
- Maintaining Material Safety Data Sheets (MSDS).
- Maintaining work place chemical inventory lists.
- Providing employees with information and training including measures employees should take to protect themselves from these hazards including proper work practices, PPE and emergency procedures.

4.8.2. Hydrogen Sulfide

Hydrogen sulfide (H_2S) is a highly toxic, flammable, colorless, and corrosive gas. H_2S can cause immediate death, even when in inhaled in moderate concentrations.

Hydrogen sulfide (H: S) characteristics:

- H2S has an offensive odor, similar to rotten eggs, which rapidly deadens the sense of smell making odor an unreliable means of detecting this poisonous gas
- H2S is heavier than air and will tend to accumulate in low-lying areas
- H2S burns with a blue flame and when burnt, produces sulfur dioxide (SO2), which is another toxic gas.
- Even at low concentrations, H2S can affect the eyes as well as the respiratory tract.
- H2S is extremely corrosive to metal requiring careful material selection.

4.9. Auditing

4.9.1. Short Service Employee

PPIME EGYPT employees with less than six (6) months in the same job type or with the company shall be considered a Short Service Employee (SSE).

- It is the supervisor's responsibility to notify the company representative of the intent to use a SSE prior to the crew coming to the job site.
- **PPIME EGYPT SSE Crew Percentage Requirements:**
- Crews with four (4) persons or less: A one-man "crew" cannot be a SSE. Two- to four-

man crews can only have one (1) SSE per crew.

- Crews with five (5) persons or more: If the crew complement exceeds 20% SSE employees, management shall approve the crew prior to beginning work, notify ATL, and obtain superintendent concurrence. Crews consisting of more than 30% SSE employees shall only be permitted with written variance approval by the ATL or Operations Manager, with Asset Manager Notification.
- All SSE personnel shall be assigned a mentor (typically an experienced employee) to assist the employee during his/her "SSE" period. The mentor shall provide close supervision to the SSE personnel and not allow him/her to perform any task in which they have not been properly trained
- SSE personnel shall be distinguished by either a sticker placed on their hard hat that must include the letters "SSE" and be of contrasting color to the hard hat or by assigning them a different color hard hat that would distinguish them from experienced employees. To remove an employee from the SSE status, the employee shall demonstrate behavior conducive to HSE (i.e. no injuries, participated in HSE programs, attended HSE meetings, etc.) for six (6) months and have a general awareness and working knowledge of the companies HSE policies.
- PPIME Line Managers will manage their subcontractors in alignment with this SSE policy.

4.9.2. Site Inspections

Planned general inspections are a key element of the PPIME EGYPT HSE Management System. If carried out correctly they will identify unsafe conditions and unsafe work practices. Hazards and dangerous conditions in the workplace must be identified and action taken. The working practices should also be monitored, for compliance with permit conditions and with local HSE procedures.

Blank inspection pro forma's for use in office and process areas arc available from the safety department and examples of both arc attached.

4.9.3. Statutory Examinations

Examples of equipment subject lo statutory examination and test include

Pressure vessels: portable hand tools lifting equipment and local exhaust ventilation systems the appropriate department should maintain lists of such equipment

Line managers should check these lists and examination documentation annually

4.9.4. Housekeeping Inspections

Line managers from the appropriate department should include in their HSE activity plan four housekeeping inspections per year an aide memoir sheet is attached and should be returned to the project manager where records will be kept

Part 3

Guideline 5

Environmental protection

Contents

5.0 Environmental protection

5.1. General

5.1.1. Environmental Risk Assessment
5.1.2. Pollution control
5.1.3. Waste Management

PART 3

Guideline 5

Environmental Protection

5.0 Environmental Protection

5.1. General

Line managers must ensure that all environmental impacts potentially arising from activities under their control are identified assessed and minimized including noise, discharges to air, water and ground.

5.1.1. Environmental Risk Assessment

Prior to beginning any work activity, an environmental assessment should be completed to determine if adequate barriers are in place to prevent an environmental incident or permit violation.

The Environmental Assessment should evaluate whether:

- Activities generate any new discharges to the air, water, or land.
- Activities require any new permits.
- Activities affect any existing discharges.
- Existing discharges exceed the permit limits.
- Activities lessen the effectiveness of existing barriers to protect for an oil or chemical spill.

5.1.2. Pollution Control

PPIME will provide (if applicable) Spill Prevention, Containment, and Countermeasure (SPCC) response plans developed to comply with environmental regulations. It is your duty to report all environmental releases including oil spills, chemical spills, etc., as soon as possible to you're supervisor.

5.1.3. Waste Management

All waste materials shall be disposed of properly. PPIME EGYPT employees are responsible for taking the necessary steps to prevent pollution and minimize the generation of waste.

Waste management shall include the following:

- Proper identification of each individual waste stream.
- Segregation of individual waste streams.
- Proper labeling, markings, manifesting, storage, and shiPPIMEng of each waste stream.

Offshore Locations - For water locations, it is unlawful to dispose of any liquids, solids, or other material overboard. Failure to comply with this regulation can result in a substantial penalty.

PART 3

GUIDELINE 6

MANAGEMENT OF CHANGE

Contents

PART 3

GUIDELINE 6

MANAGRMENT OF CHANGE

Contents

The Management of change is a recognized and a much used loss prevention Procedure: it was instigated after several serious accidents were directly caused by lack of Management control of change in PPIME EGYPT line managers is accountable for ensuring
That the HSE implications of any change either temporary or permanent are fully considered

The key to successful and effective management of change is clear and frequent Communications between all parties who are or who may be affected by it to consider both Ends of the spectrum:

- An engineering modification to a plant needs to be fully communicated to those people who maintain and operate the equipment
- The restructuring or changing of manpower organization will require good communications with all parties involved

Changes should be designed planned and implemented in a structured manner using the Following basic process

Assessment----Appropriate Authorization----structured implementation----update records

Procedures for management of change appear in PPIME EGYPT Management of change HSE
Module managers may also wish to keep a record of changes a form for this purpose is Attached

PART 3

GUIDELINE 7

THIRD PARTY INTERFACE

Contents

Part3

Guideline 7 Third Party Interface

7. 0 Third Party Interface

7.1. Contractors and Site Visitors

The PPIME EGYPT HSE Manual clearly documents our HSE procedures and compliance is a condition of employment. All contractors and site visitors are also required to conform to these procedures as a condition of engagement.

This will be achieved through:

- Supplier and contractor assessment and selection.
- Management of suppliers, contractors and visitors.
- Provision for training.
- Performance monitoring.

7.2 PPIME EGYPT Site Minimum Standards

All suppliers, contractors and visitors will have the appropriate information, training, supervision and access authority to work safely on PPIME EGYPT sites.

7.3 Suppliers and Contractors

7.3.1. Assessment and Selection

When selecting new suppliers of on site services or contractors it is important to ensure that they can achieve the standards of HSE performance required on PPIME EGYPT sites.

The assessment of a supplier or contractor who will be coming to a site to carry out work should first consider the risks associated with the work that will be done and then look for the appropriate assurances from the supplier or contractor that they have the organization, processes, plant, equipotent and competence to deliver a sate service.

The following points should help with an assessment. The depth of the assessment will be determined by the complexity, risk, etc., of the work anticipated.

Organization

- Adequacy of HSE Policy.
- An organizational structure showing who is responsible for HSE.
- Senior Management demonstrates interest in, and commitment to, HSE.
- HSE is clearly established at working and supervisory level.
- There is adequate and clearly identified supervision.

Processes

- The contractor can provide method statements. (Examples may be used).
- The contractor can demonstrate other HSE processes within his own organization such as accident reporting and performance monitoring.
- The contractor is willing to share past performance results.

Competence

- The contractor has an appropriate HSE training program.
- Staffs are adequately briefed, trained and qualified.
- Supervisors have sufficient knowledge and experience.

Plant

- All contractor cranes, welding machines etc. are in a satisfactory condition.
- Crane inspection certificates are current.

Equipment

- All equipment used by contractors must be up to PPIME EGYPT standards. To include tools, PPE, etc.

7.3.2. Engagement of Contractors

When the decision has been made to place work with a supplier or contractor the contractual agreement to carry out work on the site must specify observance of site HSE processes as defined in the HSE manual, the 'guidelines for contractors' booklet.

7.3.3. Supervision of Suppliers

Responsibility

It is the Line Managers responsibility to ensure that any access to a site by a contractor is controlled using this process. All staff that has delegated authority must fully understand and adhere to the process.

Preparation

Before any contractor begins work on a. PPIME EGYPT site, the person allowing the contractor on site, shall contact safety, which will make a risk assessment of the work to be carried out to ensure adequate controls are in place.

Depending on the type of work to be carried out, this could be achieved, for simple tasks:

- At a briefing on site just before work begins and for complex work:
- At a site meeting before work begins, attended by all interested parties.

This briefing or meeting (job safety review) would consider methodology, timing, risk assessment and control and would look at:

- Method statements
- Risk assessment
- Permit to work requirements
- PPIME EGYPT safety requirements
- Special provisions and controls, (supervision, access etc.)

The extent of all the above will need to be commensurate with the risk. I.e. the higher the risk, the more planning, effort and control required.

Access control

Close control of access to sites is a key part of the process; this is especially the case with restricted areas.

Access should only be permitted after the appropriate degree of training and information has been given.

Briefing

Depending on the circumstances of the visit, the responsible PPIME EGYPT person shall determine the appropriate safety briefing and ensure this is carried out using the checklist in Section 7, part 2 of the HSE manual.

7.3.4. Training

Training will generally be the responsibility of the contractor. However, PPIME EGYPT Safety may provide some safety training to contractors or provide guidance notes and training materials.

PPIME EGYPT Safety will provide induction training for all site visitors and contractors. (*Ref. Contractors and Temporary employees Safety Induction checklist Section 7 Part 2*). This should contain the appropriate level of information and an assurance should be gained at this stage that the contractor can perform safely.

Guidance for levels of training

Visitor:

- Site emergency procedures and site rules
- Local risks

Contractors:

- Site emergency procedures and site rules
- Local risks

- Guidelines for contractors booklet read acknowledged and signed off

7.4. performance monitoring

Performance monitoring should be carried out for suppliers and contractors to ensure control processes are adequate effective and that site standards are being maintained

The method will vary depending on factors such as number of people involved the time period and degree of risk but it should be agreed at initial assessment stage and might involve:

- review of accident statistics control processes risk assessments and safety action
- assessment based on observed performance
- safety tours /inspections with appropriate documentation of results and follow up actions

7.5. visitors

The safety of visitors is the responsibility of the host who must accompany them all times the host must ensure that adequate information is given for the safety of the visitor this will include emergency procedures site rules and local requirements

PART 3

GUIDELINE 8

INCIDENT/ACCIDENT REPORTING AND INVESTIGATION

Contents

PART 3

GUIDELINE 8

INCIDENT/ACCIDENT REPORTING AND INVESTIGATIION

8.0 Incident reporting and investigating

8.1. General

8.1.1. Objective

All incidents including near misses will be reported and serious or potentially Serious occurrences will be thoroughly investigated actions and lessons learnt to Prevent recurrence will be communicated to all personnel

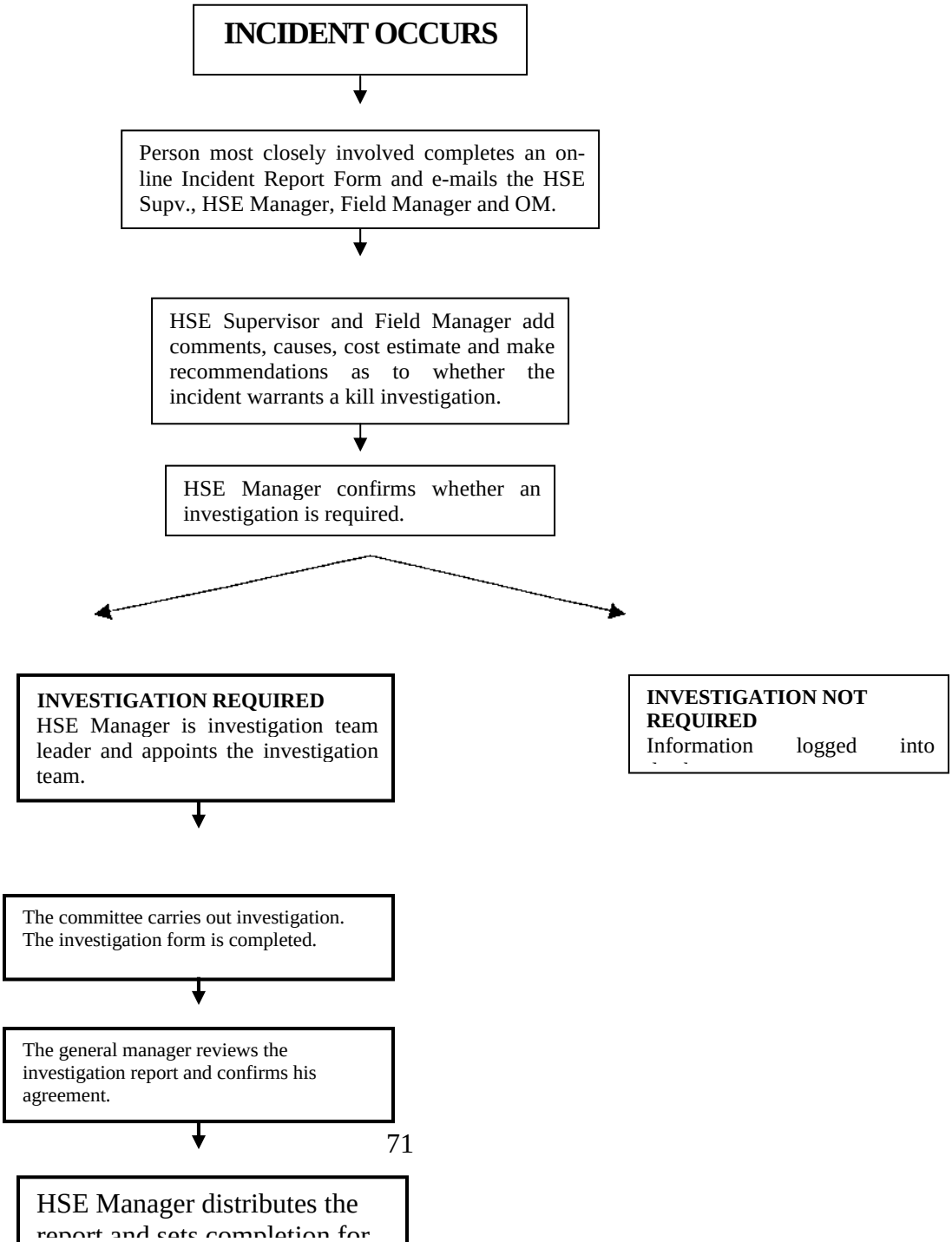
We will achieve this through:

- Incident reporting
- Investigation of incident
- Adequate mechanisms for lessons learned
- Follow up

8.1.2. Minimum standards

All HSE incidents to be reported and investigated in accordance with the site HSE Manual Incident include near misses all injuries property damage and material Releases

8.2. INCIDENT REPORTING - FLOWCHART



8.3. Definitions

8.3.1. Accident

The categories of accident which are included on the report form are defined as

Follows:-

- Fatal Injury An injury that causes the death of the injured person within one year of the date of the injury.
- Lost Time Injury (LT1) Any undesired event which results in an injury which causes a person to be absent from work on the next shift.
- Restricted Work Injury (RW1) An injury sustained at work not resulting in absence but which prevents the injured person performing their normal duties.
- Minor Injury (MI) Any personal injury sustained at work which is not classified as fatal, lost work or restricted work injury.
- Property Damage (PD) Any accident resulting in financial loss caused by damage or loss of company property. Whether or not any personal injury was incurred.
- Environmental (ENV) Any uncontrolled discharge of a substance which results in a release to ground, or atmosphere.
- Near Miss (NM) An undesired event which could, under slightly different circumstances, have resulted in an accident.

8.4. Notification

An incident involving any person on site, or any member of staff working off-site, must be notified verbally, as soon as possible, to the line manager in charge of the activity or area and to the HSE Coordinator. Priority should of course be given arranging immediate medical attention for anyone who is injured and to making the area safe. It should then be ensured that no evidence is lost or disturbed.

On being notified of the incident, the line manager or HSE Coordinator should ensure that line managers are notified of the incident.

The line manager or safely supervisor should ensure that the injured person receives the appropriate medical treatment without delay (via on-site first aid or at the nearest clinic).

A First Aid Report (see appendix 1) will be completed by the provider of treatment and sent to the Safely Manager.

The Safety Manager is responsible for collating these report forms and for providing accident trends and statistics to the Safely Committee.

8.5. Reporting

Following notification of an incident, the person most closely involved should initiate an Incident Report Form (Appendix II) indicating the estimated potential and actual critically rating on a scale from 1 to 5 (1 being low, 5 being high), incident details and type, plus a description of the incident. The Incident Report form should then be give to the line manager or safely super visor who should add comments and identity apparent causes and effects, provide an estimate of cost and indicate clearly whether a lull investigation is required.

Guidance on estimating costs is detailed in (Appendix V). In cases where actual cost or number of Jays lost due to injury cannot be inserted in the form immediately, the form should be processed and this information added later.

An investigation is normally required if the incident had the potential to cause a major or lost time injury or damage in excess of US$10,000

The form should men be sent to the Managing Director in Lagos for entry into the incident and accident reporting database, where practicable, within one working day of the incident. The Managing Director will ensure consistency in criticality rating and estimated costing.

Where no investigation is required then no further action need be taken.

Where investigation is required, the HSE Coordinator and the appropriate level of management is responsible fur appointing the Investigation Leader. This would normally be the Line Manager who has been trained in accident investigation supported by the HSE Coordinator.

8.6. Investigation

The Investigation Leader may wish to appoint other members of the team as appropriate.

The Investigation leader may require representation from:

- Safety Department;
- The Engineering Department;
- Production Department;
- Maintenance Department

The Investigation Leader should complete the Incident Investigation form (Appendix 111) in full, listing basic causes, any discussion items, clearly identifying individuals' assigned actions and target completion dates.

The form should then be sent to the HSE Coordinator who will ensure that copies are sent to any group or person who has been allocated any actions, the Safety Committee and any other group who may have a special interest in the report.

Preliminary Investigation Report should be filed within **2 working days of the incident,** for the purpose of recording the facts as quickly as possible and to take action to prevent reoccurrence. After a detailed investigation, Final Investigation Report should be filed detailing all root causes of the accident and all action items with time for correction.

8.7. Follow-up and Action Tracking

The HSE Coordinator and Line Manager concerned are responsible for ensuring that the allocated actions are taken.

Where the lessons learned from an incident are of value to the whole company, the HSE Coordinator will issue a Safety Bulletin to bring it to the attention of all staff.

Any accident which resulted in a fatality, whether it be an employee or 3rd party, will require that the line Manager with the assistance of the HSE Coordinator prepare and present a Fatality Report the PPIME EGYPT Safety Committee. This presentation will be required within 30 days of the accident.

PART 3

GUIDELINE 9

SELF REGULATION AUDIT AND COMPLIANCE

REQUIREMENTS

Contents

PART 3

GUIDELINE 10

COST OF ACCIDENTS

Contents

PART 3

GUIDE LINE 10

COST OF ACCIDENTS

10.0 Cost Of Accidents

Most if not all incidents are preventable and therefore each incident puts an extra and unnecessary cost on the company the costs of incidents can be used also as an indicator of site HSE performance and the control exercised by our management systems if costs are to be used as an indicator good assessment and consistency in their determination are required across the work sites it is important that all the significant cost elements are added to give overall total cost

10.1 Elements of accidents:

- Lost time sick pay and/or replacement costs by staff/agency due injury or occupational illness
- Cost of medical/ first aid /evacuation measures
- Costs of damage to rigs plants apparatus ,buildings ,and the environment on and offsite
- Costs to rectify any damage to include material and people costs
- Costs due to loss of production or non-optimal working conditions due to accident
- Costs of accident investigation
- Any fines court cases or extra insurance premiums

The potential costs are more difficult to determine than actual cost in essence an attempt should be made to estimate a realistic figure rather than a maximum or the minimum

The potential costs should include all the elements considered for the actual costs and should in addition include an estimation of cost had the incident gone unchecked and been allowed to reach its full potential

PART 3

GUIDELINE 11

APPENDICES

Contents

11.1 First aid report form

FIRST AID REPORT			
1.	Name of employee:		
2.	Job title:		
3.	Date of injury:	Time :	
4.	Site location when injured:		
5.	Description of injury:		
6.	Cause of injury:		
7.	Comments:		
8.classification of injuries			
Back sprain ( )	Cut/bruise ( )	Head injury ( )	Chemical contam ( )
Sprain ( )	Electric shock ( )	Eye injury ( )	Hand injury ( )

9.Action		
Returned to work ( )	Sent to camp ( )	Referred for further treatment( )
Follow up details:		
Name and signature of treatment provider: Name: signature:		
Safety department comments		

11.2. Incident report form

Incident report form				
Incident number(official use only)				
Person reporting the incident				
Name:		Job title:		
Location:		Phone:		
INCIDENT DETAILS				
Date:	Time:		Location:	
Name of injured:		Nationality:		
Job:	Age:		Years job experience:	
INCIDENT TYPES				
Lost work injury	Restricted work injury		Property damage	
Minor injury	Enviromental incident		Near miss	
Was control of contractors a factor		Contractors name:		
Potential critically rating-circle the appropriate number.				
1	2	3	4	5
Actual critically rating-circle the appropriate number.				
1	2	3	4	5
DESCRIPTION OF INCIDENT (include details of injuries)				
MANAGERS COMMENT				

SAFETY MANAGERS COMMENT

Initiator	Manager
Name:	Name:
Signature:	Signature:
Date:	Date:

11.3. Incident report form, part 2

APPARENT CAUSES\EFFECTS-CHECK THE RELEVANT BOXES:			
Cause (check one only)		Effect(s) (check a maximum of two)	
Electrical\electronic failure Ergonomic failure Mechanical failure Operator error System\procedure	☐ ☐ ☐ ☐ ☐	Contained mechanical failure Non Contained mechanical failure Electrical failure Fatalities Fire\explosion Major injury Minor injury Major property damage minor property damage near miss noise exposure release of hazardous materials	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐
Other(please describe below)		Other(please describe below)	

Estimated cost to PPI EGYPT (give details)

Check here if you **think** that the incidents needs investigating

PPI
Technology
Services Middle East (Ltd.)

Send this form to the safety supt. Within one working day of the incident

It will then be decided if the incident warrants investigation.

11.4. Incident investigation report form

Incident investigation report			
Investigation leader	name:		
Position:	Location:		Phone:
Incident#	Date:	Investigation location:	
Apparent causes			
Basic causes			
Discussion			
Actions			
action	Responsible person	Target date	completion

	Investigation leader	Safety supt.\manager	Department manager	
name				
signature				
date				
Use extra sheets as required				

11.5. incident investigation form, part2

Check list-causes of incidents	
Apparent causes	
• electrical I electronic failure defective tools inadequate warning system • ergonomic failure improper loading improper placement improper lifting improper position for task inadequate or excessive illimnation congestion or restricted space • mechanical failure inadequate ventilation defective tools inadequate guard and barriers	• operator error operating equipment without authority failure to warn failure to secure operating at improper speed using equipment improperly failure to use PPB properly making safety device inoperable removal of safety device • system\procedure servicing equipment of operation using defective equipment poor housekeeping inadequate or improper PPE • others horseplay under the influence of alcohol or drugs
EFFECTS	
Contained mechanical failure Non- Contained mechanical failure Electrical failure Fire and explosion Gas, dust , vapour , fume or smoke exposure Noise exposure Radiation exposure High or low temperature exposure Release of hazardous material	
Basic causes	

• personal factors inadequate capability lack of knowledge lack of skill stress improper motivation	• job factors inadequate leadership I supervision inadequate engineering inadequate purchasing inadequate maintenance inadequate tools I equipment inadequate work standards wear and tear\abuse or misuse

11.6. job safety analysis

Job safety analysis

Job safety analysis worksheet				Job to be performed:		
department				Task performed by : (names)		Date
	Name		Driller			
JSA written By:			Derrick man			
			Motorman			Supervisor
			Floor man			
			Floor man			
Personal protective equipment ,special tools and other equipment Required:						Supervisor approval(signature)

Step no.	Sequence of basic job steps	Potential hazards	Recommended safe job procedures
1			
2			
3			
4			

5			
6			
7			