

## Health, Safety and Environmental Requirements for Contracts

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**Santos NS Assets Pty Ltd**

**Health, Safety and Environmental Requirements for  
Contracts**

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## 1. OVERVIEW

### 1.1 PURPOSE

One of Company's core values is the safety and health of its contractors and employees and the protection of its property and the environment. Company expects the same dedication to the safety and health of personnel and property and the protection of the environment from its contractors. Company requires its contractors to adopt, implement and enforce rules and practices necessary for the safe and environmentally responsible performance of the Contract work scope. This document sets out the health, safety and environmental (HSE) requirements that must be met by Contractor.

### 1.2 SCOPE

This document is applicable to all contract work scopes and contractor personnel performing work for Company, except for Drill Rigs and Accommodation Support Vessels (ASVs) where contractor HSE Management systems primarily apply. HSE requirements for Drill Rigs and ASVs are contained in ALL/HSE/PRO/016 Attachment A2.

### 1.3 ISNETWORLD

A detailed review of Contractor's HSE Management System is required in order to conduct business with Company.

Company is using ISNetworld ([www.isnetworld.com.au](http://www.isnetworld.com.au)) as the primary contractor information management system for HSE preferred contractors.

In order to achieve HSE preferred status, contractors will need to subscribe to ISNetworld and achieve an adequate (minimum grade) assessment of HSE management system information. Through ISNetworld, contractors will submit Company required data in order for ISNetworld to review and verify that the contractor's HSE management systems are in conformance with Company standards.

Additionally, ISNetworld provides the mechanism to capture contractor exposure hours, receive Company HSE procedures, bulletins and other relevant information.

## 2. DEFINITIONS

"Company" shall mean the entity identified as "Company" in the Master Agreement, Call-Off Order, Contract or Purchase Order, or the entity identified as "Charterer" in the Charter Party, as applicable.

"Contract" shall mean the Master Agreement, Call-off Order, Charter Party, contract or Purchase Order as applicable.

"Contractor" shall mean the entity identified as "Contractor" in the applicable Contract, or the entity identified as "Owner" in the Charter Party..

"HSE" means health, safety and environment.

"Work" shall mean all elements of the activities to be performed by or on behalf of Contractor under the Contract.

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### 3. HSE REQUIREMENTS

#### 3.1 POLICY AND LEADERSHIP

Contractor shall maintain and implement a HSE policy that is aligned with Company HSE policy and demonstrates commitment to the protection of people, the environment and operating assets. Contractor management shall demonstrate commitment to policy implementation. Some key expectations include:

- Contractor acknowledges Company's strong commitment to HSE.
- Contractor has the responsibility to determine what hazards may be encountered in the performance of the Work; to undertake detailed risk assessment; and to implement the appropriate controls.
- Contractor must provide copies of its HSE policy and procedures to Company upon request.

##### 3.1.1 Unsafe Operations and the Right to Stop Unsafe Work

Contractor and Contractor personnel shall understand that they have the right to stop work when they consider it unsafe to continue. All employees and contractors have the right to refuse to do unsafe work. This right must be communicated to and understood by all personnel performing Work.

If Contractor believes that the Work cannot be safely undertaken or that continuance of operations may result in any hazardous conditions, it must immediately notify Company. Contractor shall use its best efforts at all times to prevent or minimise the effect of any hazardous condition.

In either scenario (i.e., stopping a job or refusing to do a task based on a HSE concern), the Supervisor responsible for the Work must be notified immediately.

##### 3.1.2 Termination and Suspension for Breach of HSE Requirements

Company and Contractor agree that all provisions of Company's HSE Requirements for Contracts are of the utmost importance. Any breach or violation thereof shall be considered a material and substantial breach of the Contract, including without limitation a breach of the following:

- Contractor must not cause, permit, or tolerate a hazardous, unsafe, unhealthy, or environmentally unsound condition or activity over which it has control at the work site.
- If Contractor becomes aware of any hazardous, unsafe, unhealthy or environmentally unsound condition, including without limitation a violation of any of the health, environmental, and safety standards with which Contractor must comply in accordance with the Contract, it shall immediately notify Company and take whatever steps are necessary and as agreed between Company and Contractor to eliminate, terminate, abate, and rectify the condition.
- If remedial action is not implemented within the agreed timeframe, Company or Contractor has the right to stop work forthwith.
- Contractor must take all necessary safety precautions related to the performance of the Contract in order to protect the work site, including all personnel and property of Company Group, Contractor Group, and all third parties.
- Should Company observe an unsafe act or condition or become aware of a planned act or condition which may be unsafe, Company may direct Contractor to cease, or not to proceed with, the unsafe work. Contractor shall modify, at Contractor's own cost, Contractor's method of work in order to work safely.
- If Contractor fails to take the necessary steps to eliminate or control any such breach or violation promptly or to otherwise comply with Company's HSE requirements, Company may suspend performance of the Work or terminate the Contract immediately.

### 3.1.3 Life Saving Rules

Company has established a set of Life Saving Rules to help strengthen the existing HSE Management System and drive appropriate safety critical behaviours and practices. The Life Saving Rules provide a specific rule-set for each of the following high-risk work activity processes:

- Permit to Work
- Confined Space Entry
- Work at Heights
- Lifting Operations
- Process/ Mechanical/Electrical Isolations
- Ground Disturbance/Excavation Work
- Bypassing/Inhibiting/Defeating Safety Devices or Equipment
- Driving Safely.

Note: Contractor must comply with all Life Saving Rules requirements, as updated from time to time.

## Life Saving Rules



### 3.1.4 HSE Culture

Company has implemented a number of HSE initiatives to improve the HSE culture of Company. Contractors are a critical part of the HSE culture for Company and it is expected that all contractors will participate in HSE Cultural Alignment Workshops and Initiatives as required. The figure below provides a summary of Company's HSE CLEAR expectations.

Company has set several Values that also align with Company's HSE Culture program. Contractors must align to these values when performing work at Company's sites as per below.

ABU – West HSE Expectations		
<p><i>Each employee and contractor shall take responsibility and accountability for their own safety and the safety of others through visible demonstration of <b>CLEAR</b> behaviours.</i></p> <p>Demonstration of <b>CLEAR</b> behaviours means...</p>		
EVERYONE will...	SUPERVISORS and MANAGERS (will also)...	EXECUTIVE MANAGEMENT (will also)...
<p><b>C</b>ommunication</p> <ul style="list-style-type: none"> <li>Willingly approach others</li> <li>Offer and accept best practices</li> <li>Report all incidents and near misses</li> </ul>	<p><b>C</b>ommunication</p> <ul style="list-style-type: none"> <li>Be visible in the workplace</li> <li>Foster two-way HSE discussions</li> <li>Recognize positive HSE achievements</li> </ul>	<p><b>C</b>ommunication</p> <ul style="list-style-type: none"> <li>Encourage open dialogue</li> <li>Tell a compelling case for HSE</li> <li>Incorporate HSE into communications</li> </ul>
<p><b>L</b>eadership</p> <ul style="list-style-type: none"> <li>Lead by example</li> <li>Expect others to work safely</li> <li>Ensure a safe and secure workplace</li> </ul>	<p><b>L</b>eadership</p> <ul style="list-style-type: none"> <li>Demonstrate safety as a core value</li> <li>Provide necessary tools and resources</li> <li>Never compromise on HSE issues</li> </ul>	<p><b>L</b>eadership</p> <ul style="list-style-type: none"> <li>Demonstrate safety commitment</li> <li>Align business strategy and HSE goals</li> <li>Consider HSE impacts in all decisions</li> </ul>
<p><b>E</b>ngagement</p> <ul style="list-style-type: none"> <li>Actively participate in HSE activities</li> <li>Participate in environmental programs</li> <li>Mentor each other on HSE expectations</li> </ul>	<p><b>E</b>ngagement</p> <ul style="list-style-type: none"> <li>Conduct HSE performance reviews</li> <li>Frequently interact with all stakeholders</li> <li>Actively manage contractor performance</li> </ul>	<p><b>E</b>ngagement</p> <ul style="list-style-type: none"> <li>Drive HSE Excellence</li> <li>Promote Sustainable Development</li> <li>Actively measure HSE effectiveness</li> </ul>
<p><b>A</b>ccountability</p> <ul style="list-style-type: none"> <li>Stop any unsafe act or situation</li> <li>Comply with procedures and rules</li> <li>Use correct PPE, tools and procedures</li> </ul>	<p><b>A</b>ccountability</p> <ul style="list-style-type: none"> <li>Verify the workforce's HSE competency</li> <li>Clarify all HSE roles and responsibilities</li> <li>Own the HSE excellence process</li> </ul>	<p><b>A</b>ccountability</p> <ul style="list-style-type: none"> <li>Set HSE strategic direction</li> <li>Create focused HSE goals</li> <li>Monitor and audit HSE performance</li> </ul>
<p><b>R</b>isk</p> <ul style="list-style-type: none"> <li>Never walk past a hazard</li> <li>Reassess job risk if scope changes</li> <li>Understand and use risk assessment tools</li> </ul>	<p><b>R</b>isk</p> <ul style="list-style-type: none"> <li>Understand the risk exposure</li> <li>Audit risk mitigation effectiveness</li> <li>Provide risk tools and training</li> </ul>	<p><b>R</b>isk</p> <ul style="list-style-type: none"> <li>Consider HSE impact of all decisions</li> <li>Define the acceptable risk profile</li> <li>Support corporate risk processes</li> </ul>



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## 3.2 RISK MANAGEMENT

### 3.2.1. Hazard and Risk Assessment

Prior to the commencement of the Work, Contractor shall demonstrate to the satisfaction of Company that Contractor has performed a detailed HSE hazard and risk assessment of the Work to be undertaken.

Contractor:

- Must ensure the assessment evaluates all risks specific to the work site and nature of work to be conducted under the Contract (e.g., equipment, facilities, personnel competency, complexity of the Work and activities associated with the Contract).
- Must maintain a detailed hazard register that is relevant to the Work. The hazard register shall identify hazards, preventative controls, mitigation controls, HSE management system interfaces and any additional controls in place to manage residual risk to As Low As Reasonably Practicable (ALARP) levels.
- Must monitor HSE risks and update risk assessments and hazard registers as necessary during the term of the Contract.
- Is responsible and accountable for ensuring effective procedures and safe systems of work are in place in respect of meeting all Applicable Laws and Company HSE management requirements under the Contract.
- May be required to attend or conduct additional risk assessments in relation to planned work activities in which it will be involved under the Contract.

### 3.2.2. Job Hazard Analysis (JHA)

Effective application of the JHA process at all Company operational locations is a critical daily HSE management tool. Contractor must conduct quality JHAs for all tasks that are non-routine or where there is a risk to personnel or damage to property or the environment.

For higher risk activities, such as a confined space entry or a complex work at height task, a more comprehensive risk assessment may be required. Contractor is to contact a Company HSE representative for guidance.

There is a clear requirement and expectation that Contractor's supervisors or leading hands will actively involve relevant work crews in the development and review of JHAs. This practice will help build a clearer understanding of task-specific hazards and controls.

### 3.2.3. WAVES – Behavioural-Based Safety Program

Company's behavioural-based safety program WAVES (We All Value Each other's Safety) is implemented at all Company operational locations. Contractor supervisors and personnel may be required to participate in the WAVES program.

Data from WAVES observations will be input into Company's WAVES database and these data will be routinely analysed to identify trends and system weaknesses/ strengths. This information will be reported to Company management on a monthly basis. Company WAVES program will also provide a valuable framework and lead indicator for demonstrating visible leadership and commitment to HSE requirements.

## 3.3 LEGAL REQUIREMENTS AND STANDARDS OF OPERATION

Contractor must comply with all applicable health, environmental, and safety laws and regulations, and any additional guidelines, operating standards, and policies provided to Contractor by Company.

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Contractor must be aware of all Applicable Laws pertaining to HSE in the country or area of operation and shall comply with these requirements fully. Should the Applicable Laws be of a higher standard or quality than those existing in Australia, then Contractor must comply with both the Australian statutory requirements and the higher standards.

Contractor must ensure that each member of Contractor Group and all visitors comply fully with all such laws, regulations, guidelines, operating standards, and policies. Contractor further agrees that in the event that any of the members of Contractor Group or any of their visitors violates any such laws, regulations, operating standards, and policies, such violation shall be corrected promptly, steps shall be taken to avoid recurrence, and any person or persons responsible for the violation shall be removed from the site of the Work upon Company's request.

### 3.4 STRATEGIC PLANNING, GOALS AND OBJECTIVES

Contractor shall set a goal of zero incidents and injuries, illnesses and environmental harm for the Work. These goals shall be incorporated into Contractor's site specific HSE Management Plans and cascaded to sub-contractors.

### 3.5 STRUCTURE AND RESPONSIBILITY

#### 3.5.1 Subcontractor HSE Requirements

Contractor must ensure that all members of Contractor Group (including employees, Subcontractors, and other persons) are skilled and qualified to perform the Work and that they are properly managed in the performance of the Work. Contractor must have in place appropriate formal systems, procedures and safe practices for the management and control of the members of Contractor Group, including without limitation those which address the following:

- Subcontractor HSE prequalification and qualification which is based on demonstrated capability, HSE performance, and HSE management system suitability and compliance
- Risks and hazards associated with the Subcontractor's work are identified and controlled to ALARP levels and Subcontractors employ the required safe systems of work
- Subcontractor HSE management system to be integrated into Contractor's HSE management system
- Subcontractors' work is supervised and monitored by Contractor to ensure that safe practices are employed and Work is conducted in strict compliance with relevant Contractor and Company HSE requirements.

Contractor represents and warrants that its management and supervisors are responsible, and have been advised in writing that they are responsible, for ensuring that the Work is performed in accordance with all applicable health, environment and safety regulatory requirements, best working practices, and any additional guidelines or operating standards provided to Contractor by Company.

Contractor must, at Company's request, provide Company with organisation charts, specifying any dedicated HSE resources and the areas of HSE responsibility of line management.

#### 3.5.2 Responsibilities of Contractor Management Representatives

Contractor's management representatives must:

- Cooperate with Company personnel to ensure compliance with Company HSE Management System Processes
- Ensure that Work-related risks and hazards associated with the Work are proactively identified and managed
- Ensure that resources and HSE responsibilities are allocated and that effective Contractor HSE plans are developed and implemented to manage identified risks
- Comply with the HSE requirements stipulated in the Contract and Company's HSE Management System requirements
- Develop plans and allocate resources to ensure that non-compliance issues identified in HSE audits, inspections and performance evaluations are understood and that corrective action plans are put in place and tracked to completion.

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## 3.6 PROGRAMS AND PROCEDURES

### 3.6.1 Contractor HSE Management Plans and Objectives

Company may require Contractor to prepare an HSE Management Plan for the work. This Plan must be developed by Contractor to meet all statutory and Company requirements, including:

- The HSE Plan shall be in a format that permits cross-referencing between Contractor and Company's HSE management system.
  - The HSE Plan shall also include a description of Contractor's organisation, procedures and methods of communication to and from all appropriate personnel.
  - Contractor's management systems are to include reference to documented processes and procedures to identify, assess and manage HSE and other hazards and risks that may affect their own personnel and assets as well as those of Company and third parties.
  - Where required, based on risk assessment, Contractor will assist Company to prepare bridging documents to interface their management systems to applicable Company Safety Cases, Environmental Management Plans, and Emergency Response Plans.
  - Contractor's HSE Management Plan shall be jointly used by Company and Contractor in the execution of the Contract. Performance against agreed HSE objectives and Key Performance Indicators (KPIs) will be monitored and reviewed, and HSE Plans shall be updated when required to ensure continuous improvement is achieved.

### 3.6.2 Mandatory Company HSE Procedures

Compliance with Company HSE systems and procedures is mandatory for all members of Contractor Group when working at Company facilities. Contractors must ensure that work instructions and HSE related plans comply with these HSE Requirements for Contracts.

Where it has been identified that Work shall be conducted under a Contractor HSE system or procedure, this must be documented in a Company-approved bridging document prior to the commencement of Work.

Contractor shall participate in the continuous improvement of Company procedures to ensure that all Work can be carried out safely.

Contractor shall give prompt written notice to Company of any objection of Contractor to the use of Company procedures, including the reasons for objection.

Company rights under this Section are not intended and shall not be construed to relieve Contractor from any obligations to ensure compliance with all provisions of this document and the Contract.

### 3.6.3 Contractor's HSE Manual

If requested, Contractor shall provide a copy of its HSE manual, policies and procedures to Company for review.



**Life Saving Rule:**  
**Protect yourself against a fall when working at height.**

#### 3.6.4 Work at Height

Any Work performed at a level from which it is possible to sustain an injury from a fall requires fall protection. Contractor must ensure that the members of Contractor Group required to work at height are trained in safe work at height practices. Contractor must ensure that all fall restraint and fall protection equipment provided for work at heights is certified and in a safe condition in accordance with Company's Working at Height, Rope Access and Scaffolding Procedure ALL/HSE/PRO/019.

Before working at height proceeds, Contractor must ensure the following minimum requirements are met:

- Hazards and risks associated with work at height must be identified and controlled via a JHA prior to the commencement of any work at height
- Options to eliminate the need to work at height have been assessed
- Where practical, a fixed or mobile work platform with handrails, mid-rails, and toe boards is used. A competent person must approve these platforms
- Personnel working at height, including their supervisors, are trained to recognise hazards and to use applicable fall protection equipment
- Only trained personnel erect, modify, and dismantle scaffolding
- Only competent persons inspect scaffolding
- Work surfaces, including wall and deck openings on work platforms, are properly protected to prevent falls
- Tools and equipment used while working at height are properly secured from falling
- Where work at height could interact with persons working or passing below, suitable barriers and signage are in place to prevent injury from falling objects and walking into potential Line of Fire hazards

If fall arrest equipment and system is used, it must meet the following requirements:

- A responsible person has identified and provided sufficiently rated anchor point(s) for continuous tie off, preferably above the worker's head
- A full body harness with a D-ring attachment point is used
- Synthetic lanyards with shock absorbers or fall limiter devices, all equipped with dual action self-locking snap hooks at each connection, are used
- Visual inspection of the fall arrest equipment and system, including verifying the inspection tag is current, is completed before each use, and any equipment that is found to be damaged or has been activated is taken out of service.
- A rescue plan and appropriate equipment are in place to minimise suspension trauma in the event of a fall



### 3.6.5 Confined Space

All confined space entry requires authorisation and must be completed in line with Applicable Laws and Company requirements. Additionally, before authorisation to enter a confined space is given, the following minimum requirements must be met:

- The permit has been issued and authorised with all responsible persons' signatures and has been posted at the confined space entrance
- A documented JHA has been conducted to verify that all hazards associated with the entry have been recognised and mitigated, and that these requirements have been communicated to all persons associated with the confined space Work
- Only persons that have successfully completed confined space training and have been deemed competent are allowed to enter and work in the confined space
- Changing hazards have been considered, and workers have been trained to recognise changes
- Permit conditions and risk assessment have been communicated to all affected personnel
- Pre-entry preparation and inspection have been completed to verify that all appropriate controls and isolations are in place and verified
- Required atmospheric testing has been completed; results have been evaluated and documented; and testing is repeated as described by the permit conditions
- Emergency rescue procedures and resources have been put in place and tested



**Life Saving Rule:  
Obtain authorisation before starting ground disturbance or  
excavation activities.**

### 3.6.6 Excavation and Penetration

Contractor must comply with all Applicable Laws Company requirements if conducting any excavation or penetration work on site. Specifically, before Ground Disturbance/ Excavation work proceeds, the following minimum requirements must be met:

- Competent persons have conducted a worksite risk assessment and have communicated the assessment to all affected persons
- Markings have been made visible and are maintained for use during work
- Responsible persons have authorised the excavation to begin
- All underground services have been identified, located, and if required isolated before the start of work
- Personnel entry into an excavation may only proceed when:
  - Excavation has been assessed to determine whether a confined space entry permit is required, and if applicable, a permit has been issued
  - Ground movement has been controlled and potential collapse has been prevented by effective shoring, sloping, benching, soil placement, or other appropriate means
  - A competent person has inspected the excavation before entry of personnel
  - Ground movement and environmental conditions have been and continue to be regularly monitored and inspected for change by a competent person
  - Access to the work area remains controlled
  - Where required, a rescue plan and emergency egress arrangements have been put in place and tested
  - If required, an attendant is present at the excavation site for the sole purposes of maintaining communication with entrants and raising an alarm in the event of an emergency.

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### 3.6.7 Hazardous Materials

Contractor must supply to Company, if requested, a copy of Contractor's rules for the use, transportation, handling, and storage and disposal of fuel and hazardous materials.

When Contractor proposes to take any chemicals or hazardous substances onto Company facilities, Contractor must comply with Company policies and procedures for the selection, purchase, and control of chemicals and hazardous substances. Additional requirements include:

- No chemical or hazardous substance may be taken onto Company facilities without the prior written approval of Company. Application forms are available from Company upon request.
- Wherever practicable, use of chemical substances with a flashpoint of less than 38 degrees Celsius are to be avoided, and substituted with an alternative, less flammable substance.
- Contractor must ensure that, as a minimum, all hazardous substances or Dangerous Goods are packaged and clearly labelled in accordance with the transportation requirements defined in the Australian Dangerous Goods Code.
- In addition, where the products are to be transported to or from Company premises by sea or air, the product shall also satisfy the transportation requirements defined in the International Maritime Dangerous Goods Code or the International Air Transport Association's Dangerous Goods Regulations, as applicable.
- Disposal of any chemical or hazardous substances must be undertaken in accordance with Company HSE management system requirements.

### 3.6.8 Personal Protective Equipment

Contractor must supply all members of Contractor Group, at its own expense, where required in connection with the safe performance of the Work, with adequate personal protective equipment (PPE) in accordance with the Personal Protective Equipment Procedure ALL/HSE/PRO/039. PPE must be (i) maintained in good condition or replaced if worn or damaged. Must be worn on all relevant occasions as indicated by notices, instructions, and good practice. Contractor must ensure that all members of Contractor Group (including senior personnel and visitors to the work location) wear protective garments and equipment in the appropriate circumstances, even if not actively engaged upon the Work.

The minimum PPE requirements for Company operational areas shall include:

- Approved hard hat
- Approved safety shoes
- Approved safety eye glasses (1 x clear pair & 1 x dark pair for outdoor use)
- Fire-resistant coveralls (cotton at offshore locations)

Additional/ specialist PPE equipment must be provided by Contractor depending on work-related hazards. The following equipment must be provided and used by trained/ certified personnel (where applicable):

- Hearing protection
- Welding related PPE requirements
- Fall protection PPE for any work at height where there is a risk of a fall
- Approved respiratory protection or breathing air apparatus for confined space entry (to be used only by trained/ certified personnel)
- High visibility vests for fire watchers, safety watchers, standby persons, traffic controllers, & personnel working in close proximity to roads
- Any other PPE as directed by signs, JHAs, SDS or by a Company HSE representative.



### 3.6.9 Transportation Offshore

Contractor shall acknowledge and comply with the following requirements in relation to transportation of personnel and equipment to Company's offshore facilities in accordance with Offshore Travel Requirements & Helideck Operations Procedure, ALL/HSE/PRO/022:

- Company shall procure, at its own cost, transportation of Contractor Group's personnel, equipment and supplies to and from Company's designated embarkation point and any offshore location at which all or part of the Work will be performed.
- Contractor shall deliver its equipment at its own cost to Company's designated embarkation point in due time and properly packed and marked for transportation.
- All personnel employed by Contractor to work in the Timor-Leste offshore waters must have a current passport with a minimum of six months currency prior to the expiry date.
- Personnel using helicopter and fixed wing aircraft services provided by Company shall comply with all of Company's aviation operational requirements.
- Personnel travelling offshore by helicopter must hold current TBOSIET (Tropical Basic Offshore Safety Induction and Emergency Training); BOSIET (Basic Offshore Safety Induction and Emergency Training); or FOET (Further Offshore Emergency Training) refresher for TBOSIET or BOSIET certification from an OPITO training provider recognised by Company. An OPITO accepted equivalent level of training qualification for offshore emergency training may also be considered, provided the training is recognised under the [mutual acceptance](#) in place between NOGEP, Danish Operators, Norwegian Oil and Gas Association and Oil and Gas UK that recognises safety training given at an approved centre [matrix](#). A copy of the certification is to be provided to Company for approval (formal approval shall be provided by the Operations Manager or their delegate) prior to travel being scheduled and confirmed. A list of Company's approved TBOSIET Training Providers is available upon request.
- Personnel shall be restricted to one piece of personal luggage not to exceed 10 kg in weight. One piece of soft luggage is recommended, with dimensions not exceeding 46 cm x 46 cm x 23 cm.
- Any over-weight luggage is to be advised to Company at least 24 hours prior to scheduled departure. Extra baggage and over-weight luggage may be required to travel as unaccompanied freight. Toolboxes and specialist tools required to travel with the personnel must be advised to Company at least one week in advance, as alternative shipment arrangements may be required.
- No baggage or material will be permitted inside the cabin of the helicopter owing to the potential for inhibiting exit from the aircraft in the event of an emergency.
- Personnel travelling to offshore facilities will not be permitted to carry any of the following items aboard the aircraft, which include but are not limited to:
  - Matches or lighters
  - Firearms
  - Cameras (unless pre-approval has been given by Company)
  - Alcohol
  - Explosives
  - Pyrotechnics
  - Magnetic devices or materials
  - Corrosive materials
  - Gas under pressure
  - Radioactive materials
  - Oxidising substances
  - Any other materials or substances prohibited by the IATA Dangerous Goods Regulations.



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- Prohibited drugs, other than prescription medication. Personnel carrying medication (prescription or non-prescription) shall present the medication at the heliport check-in prior to boarding the flight. Medication shall be presented to the facility medic or nurse on arrival at the facility

#### 3.6.10 Onshore Facility Access Control

Contractor must obtain written approval for individuals and plant/equipment that will be required onsite. Contractor must meet all requirements set out in Company's Onshore Facility Access Control and Vehicle Safety ALL/HSE/PRO/023. This may include, but is not limited to:

- Individuals completing site inductions
- Individuals completing specific area training/pass requirements
- Individuals obtaining authorisation for specific areas within the site
- Vehicles/ mobile equipment completing a mechanical inspection, Weed and Seed inspection, etc., prior to coming onto or leaving site.

The following items are prohibited in Operational Areas and must not be brought to site unless Company has authorised these:

- Weapons/ firearms/ ammunition
- Fireworks
- Alcohol and non-prescription drugs
- Lighters and matches
- Mobile/ cell phones
- Walkmans, MP3 players, iPods, AM/FM radios, palm computers, non-intrinsically safe torches
- Any other non-intrinsically safe electronic battery-operated device.

Additionally, the following restricted items are strictly forbidden within the Operational Area without prior approval and permit:

- Knives
- Portable electrical equipment and hand tools
- Non-intrinsically safe cameras and video equipment
- Any other non-intrinsically safe electronic battery-operated device.

#### 3.6.11 Biofouling Management

If bringing marine vessels or equipment into Australian waters from an international location, Contractor shall comply with:

- Australian Quarantine and Inspection Services (AQIS) requirements and guidelines, including the National Biofouling Management Guidance for the Petroleum Production and Exploration Industry (Commonwealth of Australia, 2009), the Operator Guidelines for Vessels 25m and Greater Arriving in Australia (AQIS, 2010) and the Australian Ballast Water Management Requirements (AQIS, 2008).
- All other related requirements as stipulated by the relevant regulatory authority.

#### 3.6.12 Fitness for Work & Substance Abuse

It is a key objective of Company to provide a safe working environment. To assist Company with achieving this policy objective, all personnel working in Company's premises are expected to behave in a responsible manner and present themselves for work in a fit and healthy state. Specific requirements include:

- Contractor must ensure that all members of Contractor Group are fully qualified, physically and mentally healthy and medically fit for their respective assignments and shall certify the same to Company if so requested.
- A medical examination will be required prior to undertaking TBOSIET.

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Contractor must ensure that Contractor Group personnel do not at any time take or work under the influence of any alcohol, narcotic, or other intoxicating substance, other than for bona fide medical reasons or other proper reasons which have been approved in advance by Contractor's or Company's medical practitioner. The following specific requirements apply:

- Vessel contractors shall maintain on-board capability to carry out post-incident and "for cause" alcohol and drug testing.
- All Contractor Group personnel shall, as a minimum, abide by the Company Substance Abuse Policy (**HR-WL-007 Rev 6**)

#### 3.6.13 Medical Welfare

The Contractor shall be responsible for the medical welfare of all members of the Contractor Group.

#### 3.6.14 Audiometric Testing

Audiometric testing must be provided for workers who frequently use personal hearing protectors as a control measure for noise that exceeds the exposure standard.

Audiometric testing must be provided within three months of the worker commencing work. Starting the audiometric testing before people are exposed to hazardous noise (such as new starters or those changing jobs) provides a baseline as a reference for future audiometric test results.

Regular follow-up tests must be carried out at least every two years. More frequent audiometric testing (e.g., every six months) may be needed if exposures are at a high LAeq,8h, which is equal or greater than 100 dB(A).

#### 3.6.15 Hygiene

Contractor must ensure that Contractor Group maintains high standards of hygiene in connection with the performance of the Work and where required carry out any such training to provide awareness.

#### 3.6.16 Smoking

Contractor shall not permit smoking at the worksite, except within designated smoking areas selected in accordance with Applicable Laws and Company's policies.

#### 3.6.17 Heat Stress

In order to control the risk of heat stress, Contractor shall comply with Company's Heat Stress Management Guidelines, ALL/HSE/PRO/013.

#### 3.6.18 Fatigue – Working Hours

Contractor shall be responsible for the administration of the working hours of the members of Contractor Group. In order to control the risk of fatigue, Contractor shall comply with Company's Fatigue Management Guidelines ALL/HSE/PRO/014 when working at Company facilities.

#### 3.6.19 Sustainability and Environment

Contractor must comply with the Company's Environmental Management System (including the Operations Environmental Management Plans, Licences/ Permits and any other relevant documentation). Contractor should be aware of and establish agreed cost-effective measures aligned with Company's Health, Safety Environment and Sustainable Development Policy.

Where applicable, Contractor's HSE Plan or bridging document should address the following, and Contractor should be able to demonstrate implementation of:

- Management of the environmental aspects and impacts identified by Company for the facility, as well as those identified by Contractor for the Work to be completed, including mobilisation and demobilisation
- Clearly defined responsibilities for environmental and sustainability requirements.
- Effective sustainability measures and programs to reduce environmental impact for all stages of the Work to be undertaken
- Planning of activities in a manner that will not create unnecessary danger, disturbance or effects on the environment or to other users, including nuisance, disturbance or interference to the community or their activities

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- A commitment to use best-available technology to eliminate or reduce impacts from activities. Effective management of hazardous substances, including training and supply of spill response equipment

#### 3.6.20 Environment

Where applicable to the Scope of Work, specific Environmental requirements include:

#### 3.6.21 Environment Plan

Contractor shall be responsible for adherence to the site Environment Plan and all statutory requirements and Company HSE management system requirements.

Contractor shall provide the necessary information to Company to prepare Environment Plan updates/ environmental approval documentation and statutory environment reports.

#### 3.6.22 Environment Project Induction

The Contractor is required to participate in a pre-commencement kick-off meeting with the Company to discuss HSE expectations, potential HSE management system interfaces and specific HSE issues and environment requirements in accordance with the Contract. The kick-off meeting shall be held as soon as practical after contract award and before the performance of any Work

#### 3.6.23 Environment Audits

Company shall have the right to conduct environment audits/ inspections of Contractor's operations, equipment, and emergency procedure at any time. Prior notice shall be given in advance of these audits. The Contractor shall fully cooperate with the Company during such audits/ inspections. This requirement shall not relieve the Contractor of its own obligations to conduct audits and reviews of its own HSE performance or expose the Company to any liabilities which may arise from the Contractor's failure to satisfy its Environmental obligations.

#### 3.6.24 Waste Management

The Contractor shall be responsible for ensuring that handling, storage, treatment, transportation, and disposal of waste is conducted in accordance with all statutory requirements, all applicable Laws and Company HSE management system requirements.

Contractor shall implement site-specific waste procedures covering waste infrastructure, relevant site procedures, operational roles and accountabilities, storage and handling of waste streams, disposal by licenced contractors, and guidance on inspection of waste facilities.

- Minimization of resource usage and waste generation during the Contract. All packaging and waste products shall be kept to a safe minimum, and where practicable shall be reusable, recyclable or suitable for environmentally safe disposal at a licensed waste handling facility.
- Use of loose polystyrene beads as a packaging medium is prohibited for materials that are to be dispatched to or from Company's offshore facilities.
- Use of waste segregation receptacles, as provided on Company facilities, and compliance with site waste segregation, handling, and labelling requirements
- Obtaining, preparing and maintaining waste permits and manifests for transporting and disposing of wastes generated by Contractor. All permits and manifests must meet with Company's approval.
- Prevention of environmental contamination from Work activities.

#### 3.6.25 Chemical Management

All chemicals (hazardous and non-hazardous) that are to be used or transported to any Australian Business Unit West (ABU-W) operated facility must receive Health Safety and Environment approval prior to project commencement. The HSE approval is to ensure health and environmental risks are identified and controlled during transport, use, and storage of the chemical products.

For activities in Commonwealth Waters, chemical products that are to be discharged to the marine environment shall meet at least one of the following environmental criteria:

- Rated as Gold or Silver under OCNS CHARM model.

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- If not rated under the CHARM model, has an OCNS group rating of D or E.

Chemical products that do not meet the above criteria shall only be used when all the following are completed:

- The risks and impacts of using them can be demonstrated to be As Low as Reasonably Practicable (ALARP) and acceptable levels,
- Approval from the relevant Company Manager/ Engineer and the ABUW Environmental Supervisor, and
- After the completion of an environmental risk assessment (see Risk Management Procedure ALL/HSE/PRO/040)

For further details on chemical management see Chemical Management Procedure, ALL/HSE/PRO/044.

#### 3.6.26 Heavy Fuel Oil Systems

Support Vessels (does not mean commercial trading vessels, e.g., Offtake Tankers, LPG, Condensate, & LNG gas carriers) with dual fuel systems must ensure that the Heavy Fuel Oil system, e.g., tanks, lines, pumps, etc., is isolated prior to commencement of the relevant project within the Bayu-Undan Contract Area.

Procedures shall be in place to manage any spills or releases of hydrocarbons to the environment in alignment with the ship board pollution emergency response plan (SOPEP). Drills shall be conducted on managing spills or unwanted releases to the environment.

#### 3.6.27 Cultural Heritage Impact Management

Contractor must ensure that appropriate measures are taken to identify and protect cultural heritage sites in accordance with statutory and Company requirements. Contractor must also ensure that its activities do not negatively impact on the customs and cultural traditions of local peoples.

### 3.7 ASSET AND OPERATIONS INTEGRITY

#### 3.7.1. HSE Critical Equipment

Contractor must ensure that all HSE-critical equipment is regularly maintained, tested, and recorded on a register and always stored in a serviceable condition for immediate use.

The members of Contractor Group must be instructed, trained and, where required, certified in the use of such HSE equipment. Such equipment must comply with all Applicable Laws.

#### 3.7.2. Tools and Equipment

Contractor must comply with the following requirements with regard to the safe use and maintenance of plant, tools and equipment as per the Company's Portable Electrical Equipment and Hand Tools Procedure ALL/HSE/PRO/020:

- Ensure that all plant, tools and equipment are serviceable and maintained in operable, safe condition
- Ensure that users of plant, tools, and equipment are trained, experienced, and – where required – licensed and certified
- Ensure that all electrical plant and equipment is regularly inspected and records maintained to show compliance with all regulations
- Ensure that Residual Current Devices/ ground fault circuit interrupters are used when operating electrical power tools and extension cords; one RCD must be used every 25 meters All hand tools and radio frequency emitting devices to be used on Company facilities must be presented to Company for inspection prior to use
- Ensure that inspection and maintenance of safety critical items is undertaken in compliance with manufacturer requirements
- Ensure that routine inspections and daily pre-start checks are carried out on plant and equipment prior to operating. Any identified defects must be rectified prior to use. Contractor shall ensure that inspection records are maintained in a central location and handed over to Company representatives when requested

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- Ensure that all rotating or moving parts of all tools and equipment are adequately guarded to prevent accidental contact by personnel
  - All power-driven machinery should be equipped with an appropriate means of shutting down the equipment quickly, and preventing it being started again. This mechanism must be clearly identifiable and accessible to the operator. In the case of outboard motors, and hand-held power tools, this shall be of an automatic or emergency shutdown "deadman- switch" type.



**Life Saving Rule:**  
**Follow safe lifting operations and do not walk under a suspended load.**

### 3.7.3. Lifting Equipment and Safe Lifting Practices

Contractor must ensure full compliance with Company HSE procedures that relate to Cranes, Lifting and Rigging Operations (Cranes and Lifting Equipment Operations Procedure ALL/HSE/PRO/041).

Contractor must maintain a register of all lifting and rigging equipment. The register will include such details as Safe Working Load (SWL), identification number and precise location of any equipment recorded. Contractor must ensure all equipment is tested, inspected and certified in accordance with all Applicable Laws and Company requirements. This includes ensuring that all lifting and rigging equipment is inspected and tagged in accordance with Company's annual inspection compliance program. Non-compliant equipment must not be used until deemed compliant.

Contractor must develop and implement relevant work instructions to manage safe lifting, loading, unloading, securing and handling operations. Contractor must ensure the work instructions are reviewed on a daily basis and monitor compliance. Contractor must ensure full compliance with the following requirements:

- Hazards and risks associated with lifting activities must be identified and controlled via a JHA prior to the commencement of any lifts. This includes the effective communication of requirements to personnel involved in the work
- All lifting/ rigging equipment must be inspected for wear and damage and have a current inspection tag from an authorised inspector prior to each use
- A trained, qualified, and competent rigger must be present where rigging equipment is used to secure and lift the load
- Tag lines must be used when there is a possibility of the load swinging
- A load must not be left suspended when a crane or lifting apparatus is shut down or unattended other than during an emergency
- All unnecessary personnel must be prevented from entering the lifting area
- No personnel shall place themselves under a suspended load
- Operators of powered lifting equipment and lifting devices are trained and certified for that equipment
- Lifting devices and equipment have been certified for use within the last 12 months (at a minimum) or per local regulatory requirements, whichever is more strict
- Load limits are clearly and legibly marked on all lifting devices and equipment
- The load weight has been verified to not exceed dynamic and/or static capacities of the lifting equipment
- Prior to lifting, the operator has confirmed that safety devices installed on lifting equipment are operational
- Clear communication (including hand signals) is established and can be maintained by all involved parties during the lifting operations
- For blind lifts, a competent spotter/ signalman uses radio communication and direct visual contact with the lift operator
- For Lifting Operations to commence, barriers have been put in place, including preventing anyone from walking under suspended loads or into the Line of Fire
- Changing conditions (e.g., weather, winds) have been discussed and prepared for.

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#### 3.7.4. Equipment and Facility Maintenance

All equipment and structures both fixed and temporary are to receive regular routine maintenance under a planned maintenance system to ensure the safety of personnel who are responsible for operating the equipment. Particular attention should be paid to mobile equipment, handrails, access ladders and raised platforms.

Contractor must maintain copies of all test and maintenance certificates relating to cranes, derricks, lifting beams pulley blocks, lifting gear and slings, and must make them available to Company upon request.

#### 3.7.5. Management of Change

For Work conducted at a Company site, Contractor must comply with Company's Management of Change procedure to ensure that risks associated with changes to Contractor's organisation, engineering (design and implementation), and documentation have been assessed and controlled to ALARP. A copy of the procedure is available on request.

For offsite Work conducted under the Contract, Contractor is responsible for ensuring that risks associated with technical and non-technical changes have been assessed and controlled to ALARP.

### 3.8 EMERGENCY PREPAREDNESS

Contractor must ensure that all members of Contractor Group working onshore or offshore at the site or facility, including visitors, are properly instructed in Company emergency response procedures and HSE rules and such training is recorded and available for inspection.

Members of Contractor Group working on Company facilities will be instructed in the emergency response procedures and HSE rules as part of the facility induction.

#### 3.8.1 Emergency Response

Contractor must comply, where required, with Company's Emergency Response Plans and Procedures whilst working on Company facilities. Any conflicts with Company's Emergency Response Procedures shall be addressed and resolved prior to commencing the Work.

For certain worksites, based on risk assessment, Contractor will be required to provide a written emergency response plan that is established prior to initiating Work at the site.

In the event of impending adverse weather or other conditions, Contractor must have a procedure in place to implement, in consultation with Company, the appropriate precautionary measures to safeguard personnel, property and environment.

#### 3.8.2 Emergency Drills

On request, Contractor must conduct or participate in emergency response drills (i.e., fire, spill, evacuation and boat drills, man overboard, injured person recovery) to test the effectiveness of its emergency procedures and equipment and the knowledge and proficiency of all response personnel.

Contractor will record and report the emergency drill results to Company if requested, and to any regulatory agency as required.

#### 3.8.3 Fire-Fighting

Contractor shall prominently publish in all relevant languages for all areas of work under its control, the procedures to be carried out in the event of fire and ensure all members of Contractor Group at site receive regular instruction in basic fire-fighting techniques. Contractor must ensure that adequate approved fire-fighting equipment is available at its work sites. Contractor shall comply with additional requirements for Hot Work which are described in Company's Permit to Work Procedures.

#### 3.8.4 First Aid

Depending on the facility or location of Work, Contractor may be required to provide its own first aid equipment, supplies, and trained personnel. The trained personnel must be familiar with Company's most recent guidance on injury classifications and Company's approach to Injury Management.



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### 3.8.5 Security

Contractor is required to have in place effective security arrangements for the duration of the Contract. Where warranted Company may require a documented Security Plan. Company's security focus is described below:

- People: Contractor shall ensure security of people is a priority
- Assets: Contractor protects Company's assets by incorporating security into design and operations
- Information: Contractor protects Company's information by implementing procedures that ensure information security.

Contractor will periodically review and update the Security arrangements to ensure its ongoing relevance to the Scope of Work. Any updates to the Security arrangements will be submitted in writing to Company's Representative.

The Security Plan/ arrangements will nominate all Contractor Personnel responsible for Security.

Upon receipt of a request from Company to do so, Contractor will provide Company with its security manuals and plans, including processes to ensure Subcontractor security, where applicable.

Contractor will advise Company Security Officer of any security incidents and provide the associated investigation report along with any identified corrective action for implementation.

### 3.8.6 Personnel Security Search

One of the conditions of entry to Company's work site or facility is the consent to searches by Company of Contractor Group and items or equipment in their possession.

Personnel searches may be performed by way of a physical "pat down" or such other method as Company may require from time to time. Specific requirements include:

- Contractor must obtain written consent forms executed by each member of Contractor Group acknowledging and consenting to the conduct by Company of the searches set out in and in accordance with the terms of the Contract.
- Any person who refuses to be searched or is found to be in possession of a prohibited item or substance shall be directed to leave the premises.

### 3.8.7 HSE-Related Rules and Restrictions

Contractor must enforce the prohibition of cameras, weapons or explosives on work sites unless Company expressly waives such obligation in writing.

Contractor must confine their personnel to their assigned areas and prohibit loitering or wandering into areas beyond the boundary of their work assignment.

Contractor must ensure that all members of Contractor Group comply with all rules and regulations in place at Company facilities.



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### 3.9 AWARENESS, TRAINING, AND COMPETENCY

Prior to the commencement of the Work, Contractor must provide documentation regarding the competency of each member of Contractor Group to the satisfaction of Company. This documentation must include details that show that the members of Contractor Group are competent and have the appropriate qualifications, job skills, and training as required by Contract and Applicable Laws.

#### 3.9.1 Inexperienced Personnel, New to Site Personnel, and Temporary Labour

Contractor must ensure that risks associated with inexperienced personnel, temporary labour, or new to site personnel are identified and controlled. As a minimum, these individuals shall be appropriately supervised and monitored until they are deemed to be competent by Contractor and are fully aware of the hazards and required controls associated with their assigned work.

#### 3.9.2 HSE Training

Contractor is responsible for identifying necessary training (including common industry inductions) and verifying that all members of Contractor Group are properly prepared to perform the Work. In some cases, Company may provide this training.

Contractor must develop and implement an HSE Training program for Contractor Group to meet Company's requirements and Applicable Laws. This program shall also address requirements for basic HSE training, specialist HSE training and HSE refresher training for existing personnel. Additional requirements include:

- Contractor must maintain a training records keeping system in order to demonstrate that training needs have been met. At a minimum this system should contain: course title, date of training, course organizer, name of participant, and result of any testing to verify understanding and date of required recertification training
- Before starting Work under the Contract, Contractor shall at its own expense ensure that Contractor Group has been given the necessary basic HSE training including, but not limited to:
  - Introductory briefing explaining the nature of the Work
  - Overview of the general hazards that may be encountered during the operation and the particular hazards attached to their own function
  - Contractor's own HSE policy and procedures which shall satisfy all guidelines and/or operating standards provided by the Contractor to the Company

The members of Contractor Group shall implement at their own expense (unless otherwise formally agreed by Company), prior to the commencement of the Work, any specialist HSE-related training programs applicable to the Work (including for supervisory personnel). Such training programs must be run by recognised training organisations, or by Contractor's own field supervisory staff having experience and expertise in the relevant area of training.

Before travel offshore Contractor, at its own cost, must provide TBOSIET, BOSIET or FOET training to all members of Contractor Group and provide certification to Company.

Wherever possible, all necessary training shall be completed at least one week prior to scheduled offshore travel or commencement of Work. Certificates of the training shall be provided to Company upon request.

Unless Company makes special provisions to ensure the immediate availability of bilingual supervision at the job site, all members of Contractor Group are required to be able to speak, read, and write in English. All members of Contractor Group who perform process work, maintenance, and other HSE-critical work shall be able to speak, read and comprehend technical English.

Upon arrival at Company facilities, members of Contractor Group shall be required to attend a facility specific HSE orientation course before being permitted to undertake any work activity.

Contractor shall, if requested, provide Company with details of ongoing training programs and shall provide Company with all related revisions during the term of the Contract.

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### 3.9.3 Verification of Competency (VOC)

Assessing for Verification of Competency (VOC) is used by many industries as part of the pre-mobilisation checks or prior to contractual employment. The purpose of a VOC assessment is to provide a method of verifying the skills, abilities; knowledge, and attitude of personnel to not only undertake high risk work activities or operate plant or equipment, but do so in a safe manner.

Before starting work, Contractor shall have in place a verification of competency (VOC) process for any personnel conducting High Risk Work License activities on Company facilities. Contractor shall demonstrate records of completed VOCs when requested by Company. These processes will be subject to audit and approval by the Company Competency Assurance and the HSE team. Note: Company may also require VOC for other activities as required, e.g., painting & blasting.

Contractor's verification processes must provide a sound level of assurance that individuals possess the necessary practical skills, knowledge, experience, and ability to perform their work without risk to themselves, others, the facility, plant and equipment, or the environment. All personnel are required to undertake VOC certification at least every 3 years, to ensure they are up to date with new industry regulations, workplace safety standards, and any new technology or policies related to the industry and job role.

The VOC is to be facilitated by either an RTO or the contractors internal VOC system using a subject matter expert and shall include the following:

- Validation of experience through documentary evidence

E.g., High Risk Work licence or equivalent prior to the VOC being conducted

- Challenge testing of underpinning knowledge

A written theory assessment completed that determines the level of underpinning knowledge related to the work activity

- Observation of practical performance of work

Each assessment should take a minimum of 1-2½ hours (however will depend on type of plant and/or requirement)

- The level of proficiency is documented.

The outcomes of the VOC process shall be recorded and tracked against targeted competencies (i.e., through a competency matrix or similar). Some Contractors (as determined by the Company Contract Sponsor/ Contract Owner) will be required to register with ISNetwork and upload/ maintain all relevant HSE training and competency records.

### 3.9.4 Authority to Operate (ATO)

The Authority to Operate (ATO) process is Company's term for the Verification of Competency (VOC) program applied for any Contractor personnel using applicable Company-owned powered mobile equipment or other designated equipment (e.g., overhead cranes, forklifts, elevated work platforms, etc.). The ATO is formal verification and approval that an individual can operate site specific equipment or undertake specific tasks safely and according to requirements of the work site, relevant procedures, and equipment operating guidelines. After the VOC has been conducted by Company or their authorised representative, and competency confirmed, the authority to operate the related equipment or undertake a task on the specific Company site is given to the individual and recorded by Company.

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### 3.10 NON-CONFORMANCE, INVESTIGATION AND CORRECTIVE ACTION

Incident reporting must be actively promoted and encouraged at all Company-controlled work locations. All hazards and incidents (including near miss incidents) must be reported in accordance with relevant Company procedures. Specific requirements include:

- If Contractor believes that the operations cannot be safely undertaken or that continuance of operations may result in any hazardous conditions, Contractor shall stop work immediately and notify Company.
- Contractor must use its best endeavours at all times to control or overcome the cause or minimise the effect of any hazardous condition.
- Contractor must comply with all Applicable Laws for hazard and incident reporting. When working on Company facilities, Company's Incident Reporting and Investigation Procedure ALL/HSE/PRO/003 will also apply. A copy of this procedure will be provided upon request.
- Any hazard or incident (including near miss) involving Company Group, Contractor Group, or any third party personnel, property, plant, or equipment, shall be reported immediately to Company, irrespective of whether injury to personnel, damage to property or equipment, or environmental damage has resulted.
- Particular regard is to be given to Company thresholds for reporting incidents. Injury classification must be in accordance with Company's injury and illness reporting guidelines, available upon request from Company.
- All unplanned or unauthorised spills and releases are to be reported, regardless of volume.
- Where requested by Company, Company and Contractor (jointly) shall investigate the causes of all work hazards and incidents using Company's investigation system. The investigation shall provide both Company and Contractor management with corrective actions to prevent recurrence.

### 3.11 COMMUNICATIONS

Contractor shall set out a communications scheme showing lines of reporting and methods of reporting, at all levels within Contractor organization, and to Company.

Contractor will be required to communicate and consult with its workforce on a regular basis on HSE matters. This is essential for ensuring that its personnel are informed and aware of relevant information, work hazards, safe practices and responsibilities. To enable effective communication, Contractor shall conduct or participate in the activities outlined below.

#### 3.11.1. Daily Pre-start Meetings

Daily pre-start meetings are held to discuss the planned work tasks, review job specific JHAs and Permit to Work requirements, and communicate any relevant HSE matters.

#### 3.11.2. HSE Meetings

Contractor is required to plan and conduct regular HSE meetings with the members of Contractor Group to:

- Ensure that all members of Contractor Group are informed of and aligned with Company's values, HSE goals and requirements
- Ensure personnel are informed of hazards and required safe work practices and regulations associated with their work
- To communicate about past incidents, lessons learned and share relevant HSE information
- To provide an opportunity for personnel to raise HSE issues and concerns, and to provide a feedback forum

The frequency of HSE meetings should be determined by the nature of the Work and related level of risk; typically, a minimum frequency of one meeting per month is acceptable for normal activities, but frequency should be increased for higher risk work activities. Contractor shall also ensure that all Contractor Group personnel attend daily pre-start meetings.

Contractor shall ensure that its workforce is given time to attend HSE meetings. This includes compulsory attendance at routine toolbox, pre-start meetings, and shift handover meetings.

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Contractor is also responsible for inviting Company representatives to its HSE meetings and ensuring that meeting minutes and actions arising from HSE meetings are maintained and submitted to Company. Company representatives or their delegates and HSE Department representatives are responsible for ensuring that Contractor is conducting regular quality HSE meetings. This can be achieved by attending Contractor HSE meetings, talking to Contractor Representatives, and reviewing HSE meeting documentation. Company representatives may without prior notice attend any such HSE meeting.

Contractor shall also provide Company with a strategy on how it proposes to manage actions arising from shift handover meetings.

#### 3.11.3. Pre-Commencement Kick-off Meetings

Contractor is required to participate in a pre-commencement kick-off meeting with Company to discuss HSE expectations, potential HSE management system interfaces, and specific HSE issues and requirements in accordance with the Contract. The kick-off meeting shall be held as soon as practical after Contract award and before the performance of any Work.

This meeting shall not be considered or treated as a substitute for HSE responsibilities of Contractor under the Contract; nor shall the meeting or issues be construed or treated as an assumption of Contractor's HSE obligations under the Contract.

Items to be discussed at the Pre-commencement kick off Meeting may include without limitation:

- Review of Company HSE policy, expectations and SPIRIT values
- Review of the requirements of this document and any additional specific HSE requirements identified in the Contract
- Review basic HSE rules and HSE Management System requirements
- Review of any agreed HSE key performance objectives, targets and indicators
- Review management of high risk activities and controls (including Permit to Work requirements and key procedures)
- Review Contractor HSE Management Plan and bridging document, emergency response plans, etc. (or if not complete, plans for completion)
- Review HSE roles and responsibilities
- Review HSE orientation processes to be implemented (e.g., Company requirements, Subcontractor orientations, and worksite-specific orientations for new personnel and visitors)
- Review of processes for hazard and incident reporting and behaviour based observation programs
- Review of HSE related issues and issue management process
- HSE reporting and communication requirements
- Review Contractor HSE training program
- Confirmation of Contractor's employee and subcontractor competence
- Confirmation of the scope and schedule of key HSE activities including: HSE orientation/induction, HSE meetings, HSE training, audits and reviews
- Interaction of Company and Contractor contingency plans and ensure that the emergency response plan is fully understood by Contractor and Company
- Environmental management and impact mitigation requirements
- Communication plan for briefing of the members of Contractor Group on key information and outcomes from the pre-commencement kick-off meeting

#### 3.11.4. HSE Review Meetings

Company may request meetings with Contractor to review Contractor's HSE performance. These meetings will be formally requested and appropriate members notified. Contractor must comply with Company's request.

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### 3.12 DOCUMENT CONTROL AND RECORDS

Contractor documents, including policies, procedures, plans, reports, inspection records, training records, meeting minutes and statistics applicable to the Contract workscope shall be maintained in accordance with a document control process which permits appropriate retention, access, review and update. Only the latest approved version of documents shall be utilised in the execution of the Work.

### 3.13 MEASURING AND MONITORING

Contractor shall submit a monthly HSE performance report to Company. This monthly report shall specifically report on HSE performance for the Contract only (not Contractor's company-wide performance). Company will monitor Contractor's HSE performance against agreed HSE KPIs, requirements and expectations to identify trends, areas of strong performance and areas of concern requiring corrective action. At a minimum the monthly reports shall include the following:

- Monthly man-hours worked on the Contract
- Monthly Contractor Group site exposure hours
- Number of near miss incidents reported
- Number of recordable incidents (fatalities, medical treatment cases, lost workday cases – including number of days lost and date of last lost workday case, restricted work cases – including number of days of normal duty lost for each case)
- Total Recordable Incident Rate (No. of TRIs divided by total exposure hours, multiplied by 200,000)
- Number of first aid cases
- Number of environmental incidents (spills and releases from primary containment)
- Number of property damage Loss Incidents
- Additional lead KPIs and HSE reporting requirements will be specified in the HSE plan as required by Company. These lead KPIs may include:
  - Number of hazards reported
  - Number of HSE audits and inspections conducted including results
  - Number of HSE meetings conducted
  - Number of emergency exercise/drills conducted for the month

Contractor may be required to monitor and report additional environmental KPIs (e.g. the use of resources such as fuels and other consumables during the period of the Contract and the volume and type of waste generated).

Monthly site exposure hours and incident information shall also be entered into ISNetwork "Site Tracker" by the 7th day of each subsequent month.

### 3.14 AUDITS

Company shall have the right to conduct audits/inspections of Contractor's operations, equipment and emergency procedures at any time in accordance with the Contract. Prior notice shall be given in advance of these audits. Contractor shall fully cooperate with Company during such audits/inspections. This requirement shall not relieve Contractor of its own obligations to conduct audits and reviews of its own HSE performance or expose Company to any liabilities which may arise from Contractor's failure to satisfy its HSE obligations.

Contractor shall have an appropriate formalised process and program for undertaking its own formal and informal routine inspections, audits and reviews. Specific requirements include:

- Planned inspection / audits shall ensure that all facilities and condition of work sites are well maintained, in good order, and that Contractor's HSE Management System is working appropriately.

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- Contractor HSE Representative shall be responsible for conducting and have an execution schedule of planned inspections/ audits.
  - Records of such inspections, audits and reviews shall be maintained. Corrective actions shall be identified, implemented and tracked to completion.
  - A joint internal audit program may be carried out between Company and Contractor.

### 3.15 REVIEW

Contractor shall have a formal process to regularly (at least annually) assess contract HSE performance against objectives. Where deficiencies are identified, corrective actions shall be developed and implemented.



## APPENDIX 1: Company Environment, Health & Safety Policy

### Environment, Health & Safety



### Policy

#### Our Commitment

Santos is committed to being the safest gas company wherever we have a presence and preventing harm to people and the environment

#### Our Actions

We will:

1. Integrate environment, health and safety management requirements into the way we work
2. Comply with all relevant environmental, health and safety laws and continuously improve our management systems
3. Include environmental, health and safety considerations in business planning, decision making and asset management processes
4. Identify, control and monitor risks that have the potential for harm to people and the environment, so far as is reasonably practicable
5. Report, investigate and learn from our incidents
6. Consult and communicate with, and promote the participation of all workers to maintain a strong environment, health and safety culture
7. Empower our people, regardless of position, to "Stop the Job" when they feel it necessary to prevent harm to themselves, others or the environment
8. Work proactively and collaboratively with our stakeholders and the communities in which we operate
9. Set, measure, review and monitor objectives and targets to demonstrate proactive processes are in place to reduce the risk of harm to people and the environment
10. Report publicly on our environmental, health and safety performance

#### Governance

The Environment Health Safety and Sustainability Committee is responsible for reviewing the effectiveness of this policy.

This policy will be reviewed at appropriate intervals and revised when necessary to keep it current.

Kevin Gallagher

Managing Director & CEO

Status: APPROVED

Document Owner:	Jodie Hatherly, General Counsel and VP Legal, Risk and Governance		
Approved by:	The Board	Version:	3

20 August 2019

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