

PSi Offshore & Oilfield Services Ltd.

"ENVIRONMENT FIRST"

HEALTH, SAFETY AND ENVIRONMENT POLICY

PSi Offshore & Oilfield Services Ltd HSE Policy Outlines

- Protection of the environment;
- Protection of personnel;
- Protection of assets

PSi Offshore & Oilfield Services Ltd is looking forward to having an HSE performance to be proud of so as to earn the confidence of its clients and society at large and to achieve our goals we should:

- Set targets for improvement, measures and reports performance
- Promote best practice in our services
- Promote culture in which all PSi Offshore & Oilfield Services Ltd employees share this commitment
- Put HSE matter on the same level as any other critical business activity
- Ensure that subcontractors are committed to its HSE policy

1. Commitment to HSE through leadership and Management

A good example of commitment to HSE issues should be set by all managers and senior staff and should show visible expressions for all employees. All work sites' supervisors should place HSE matters high on personal and collective agenda and promote for positive culture at all levels by encouraging employees to feedback on HSE matters. We recognize that good management includes a strong moral and social commitment to all Health, Safety and Environmental matters and will ensure that our objectives have been achieved.

2. Hazard Evaluation and Risk Management / Identification

Risk is present in all human endeavors so in this new HSE plan we shall address the identification of HSE hazards and evaluation of HSE risks, for our all activities, services, and development of measures to reduce these risks.

3. Organization, Resources and Plan

Organization

Management structure of PSI OFFSHORE & OILFIELD SERVICES LTD for its all activities and its relation to the implementation of HSE policy within the organization shall be in place and made widely available. So, all employees involved in our activities shall be made aware of their individual role, accountability and responsibilities because allocation of HSE responsibilities will depend upon the nature and structure of the individual company.

Resources

The allocation of necessary and justified resources for HSE matters is one of PSI OFFSHORE & OILFIELD SERVICES LTD's main objectives.

Competence

PSI OFFSHORE & OILFIELD SERVICES LTD good level of competence based on personal abilities, skills and experience so all personnel are capable to carry out HSE-critical functions and always we include activities and roles which affect the HSE performance in job description and performance appraisals.

Training

Training and refresher courses are so important and ensure that all personnel can make appropriate contribution to good HSE performance as well as new recruits and staff assigned to new tasks, equipment and procedures, understand their roles and responsibilities for HSE matters.

Sub-contractor

Pre-qualification, training and intensive HSE inductions are provided to all sub-contractors working on PSI OFFSHORE & OILFIELD SERVICES LTD premises or on behalf of PSI OFFSHORE & OILFIELD SERVICES LTD

Planning

Activities for which the absence of written procedures could result in infringement of HSE policy so a plan should be set before commencement of work and evaluation procedures should be followed before work. That is why we should maintain procedures for planning and controlling changes, both permanent and temporary, in people, processes and procedures, to avoid adverse HSE consequences. These procedures should be suitable to address the HSE issues involved, according to the nature of the changes and their potential consequences. Written procedures should be stated simply, unambiguously and understandably, and should indicate the persons responsible, the methods to be used and, where appropriate, performance standards and criteria to be satisfied.

Work Plan

All executive level employees, supervisors and HSE advisors are responsible to put an effective and appropriate plan before any job commencement. Through the plan expected risks and hazards should be identified and how it could be prevented or mitigated.

Hazards Identification

Going back deep into the past, and from our extensive experience, we can say many hazards that related to our activities were identified and some control measures and appropriate procedures to reduce them are made.

Stop Card System

However, it is much more than that. It is the cornerstone of our safety system on all of our working sites. It is a simple tool, which we use to firstly, identify and secondly-and this the most important-eliminate unsafe acts and conditions, which exist in our work place so it can also be used to identify good working practices.

Personal Protective Equipment (PPE)

All supervisors at work sites shall be capable and responsible for issuing appropriate PPE for their staff and shall have the competence and information required to ensure proper PPE.

- PPE shall meet the internationally recognized and accepted industry standards
- Provide actual protection against hazards
- Suitability for work activities
- Safely used without increasing risk in itself

4. Implementation and Monitoring

Activities and Tasks

To ensure that HSE objectives are met and that performance criteria and control limits are not breached a perfect implementation of HSE policy and a defined monitoring system are established regarding daily performance of work. In a good effective monitoring system we recognized procedures for both active

and reactive monitoring because active monitoring provides information in the absence of any incident, ill-health or damage to the receiving environment meanwhile reactive monitoring provides information of incidents (including near-miss incidents, ill-health or environmental damage) that have occurred and provides insights into the means of preventing the similar incidents in the future. Now we are maintaining procedures to ensure the integrity, accessibility and control of such records which include the results of audits, reviews training records and employee medical records. Situation of non-compliance may occur so a corrective action should identified by the monitoring program, through communications from employees, or investigation of incidents. The implementation of work-site instructions and planned arrangement requires that procedures and instructions are followed, at all levels and all the staff need to be familiar with relevant procedures and instructions before start.

Records

PSI OFFSHORE & OILFIELD SERVICES LTD HSE Department maintaining procedures for the internal recording reporting of incidents which affected, or could have affected, HSE performance, so that we can learn from the relevant lessons and appropriate actions taken. Following-up incident by immediate circumstances and the underlying Health, Safety and Environment Management System (HSEMS) weaknesses which caused it should be made by person who is in charge.

Non-Compliance and Corrective Action

Some procedures were maintained for such investigation and corrective action, by which the management of individual function or activity concerned.

Incident Reporting and Follow-Up

Reporting incident, using an internal recording system, and incident following-up procedures are perfectly maintained. All incidents affect HSE performance, so by reporting and keeping records the relevant lessons can be learned and appropriate actions taken. Two main factors, circumstances of the incident and HSEMS weaknesses which caused it, shall be identified and corrective action made. The level of responsibility for incident following-up depends on the severity of its real or potential consequences. An investigation shall take place at any case of incident and procedures should include the following:

- Assign a team and a team leader.
- Gather information through witness statements, witness interview, police or other authority's reports, expert advice, paper records.
- Examine parts, equipment, tools, analyze photographs, sketches, measurements, re-visit incident scene.
- Develop a sequence of events and determine the priority of contributing factors.

- Determine and list corrective actions and recommendations with named action part and target.
- Name action party and target date for follow up on entire set of corrective actions and recommendations.

Main features of HSE implementation

- Managing our operations with diligence and with the awareness that our goals are to protect human health, safety, and the environment and prevent pollution, by employing best control mechanisms, procedures and processes.
- Comply with relevant HSE legislation and provide self-monitoring to ensure compliance.
- Publish the HSE Policy internally, by communication to all employees and posting the document on Train our employees to apply best HSE practice and permit them to stop any type of job at any stage of operations that may have hazardous impact on human health, safety and the environment.
- Continual improvement of the HSE Management System ensuring efficient and effective HSE Performance.

Environmental policy

“Environment first”, that’s the motto we live by. PSI OFFSHORE & OILFIELD SERVICES LTD is committed to environmental protection and the prevention of accidental loss of resources and assets that affect our employees and PSI OFFSHORE & OILFIELD SERVICES LTD ’s profitability by focusing on our primary environmental concerns, which consist of the appropriate use of natural resources, management of waste, land contamination, material storage, water discharges, minimizing foot print and emissions to air. Human activities can overload the environments finite capacity to absorb waste, physically modify or destroy habitats, and use resources more rapidly than they can be generated or replaced. Effort must be made to develop transportation systems that minimize physical and biological stress, staying within the assimilative and regenerative capacities of ecosystems, and respecting the habitat requirements of other species.

Pollution prevention:

Transportation needs must be met without generating emissions that threaten public health, global climate, biological diversity or integrity of essential Ecological processes.

Transportation systems must make efficient use of land and other natural resources while ensuring the preservation of vital habitats and other requirements for maintaining biodiversity.

Waste Management, classification and separation

Waste streams on sites shall be identified and recorded. Each waste stream shall have its own final disposal and treatment as shown in the table below, is strongly recommended to set up a system to segregate waste at origin points. Waste generated construction activities shall be identified and segregated according to the following criteria:

Burnable waste: paper, wood, plastic, textiles and packaging material.

Non burnable waste: metallic drums and cans, metallic scrap, glass.

Organic: Kitchen waste, food leftovers, expire food, rotten products.

Medical waste: Needles, razors, etc.

Hazardous waste: Chemicals, paint, thinner, oil, solvents.

In order to segregate and manage and waste streams the following waste receptacles shall be applied to the following criteria.

- Burnable waste (papers, wood, plastic, textiles and packaging materials).
- Non – burnable waste: metallic, drums, and cans, metallic scrap, glass).
- Medical waste (Needles, razors, etc....).
- Hazardous waste (battery, strip lights, paint, chemical, oil, and waste oil storage).
- Organic: kitchens waste, food leftovers.

In order to protect the ground of area where chemicals and oil waste is stored the following shall be in place: A protective liner must be placed on the ground in order to protect the ground soil from spills, as well as any other additional means to provide a secondary containment, whenever the waste is fluid.

Environmental Protection and waste Reduction:

Minimize transportation-related air emissions and discharges of contaminants to surface (fresh and salt water) and ground water.

Minimize the generation of waste through each phase of the life-cycle of transportation vehicles, vessels and infrastructure. Reduce, reuse and recycle.

Ensure that the rate of use of renewable resource use is minimized.

Ensure emergency management systems are in place in order to respond to spills and other transportation-related accidents.

Land Use:

Emphasize compact urban form in order to reduce habitat destruction and loss of agricultural and recreational lands around urban areas.

Minimize the impact on natural habitat and the wildlife and people it supports in the designs, construction and operation of inter-city transportation systems and infrastructure, including, for example, highways, pipelines, and railways.

Energy Use:

Reduce fossil fuel consumption and emissions through efficiencies and demand management.

Promote the use of alternative and renewable energy.

Health and Safety policy

PSI OFFSHORE & OILFIELD SERVICES LTD is committed to occupational health & safety protection for all employees and contractors who enter the facility by ensuring that all personnel are competent and capable in conducting safe and correct operational practices and are able to immediately stop and take timely corrective and preventive action when potentially unsafe or harmful conditions are identified.

Smoking

PSI OFFSHORE & OILFIELD SERVICES LTD is committed to maintain a safe working environment and conducts its business against high standards of safety and concern for the environment. It is the responsibility of every employee, client, supplier, contractor & sub-contractor to adhere to PSI OFFSHORE & OILFIELD SERVICES LTD oil company Smoking Policy

PSI OFFSHORE & OILFIELD SERVICES LTD'S Transportation Policy

All drivers must be assessed & trained prior to driving any PSI OFFSHORE & OILFIELD SERVICES LTD vehicle. All occupants must wear seat belts. Report vehicle deficiencies to Mechanics. Check fuel, fluid levels, tracks, tires, survival kits, first aid kits, fire extinguishers before departure every day. Location of fuel, fueling procedure to be carried out by fuel man only. Journey Management requires all drivers to complete requirements before travel to and from work sites. If your vehicle does not return within 1 hour after JM ETA, man lost called. DO NOT PANIC & STAY WITH VEHICLE.

Journey Management Plan

- What we should do before we start a journey?
- The Manager or work site Supervisor shall assign a journey manager and the latter will be responsible for:

- Assign appropriate equipment and qualified personnel for the journey.
- Assign a qualified driver with current certification for the type of vehicle to be used.
- As soon as possible start a formal pre-trip briefings and this meeting shall be documented.
- Discuss routes, stops, hazards, loads, the requirement for the driver to report completion of the journey, and also discuss all probable risks
- Identify the communication means between the driver and journey manager and the latter ensure communication protocol.
- Define the route of the journey clearly and provide the driver with any available maps.
- Discuss driving hazards, especially dangerous intersections taking in to consideration the terrain, time of day, weather, known dangerous routes, speed limits, etc...
- Assign truck with recommended specifications considering all circumstances discussed above.
- Inspect the truck using vehicle inspection form.
- Fill out journey management form on the other hand relay to the destination person the estimated expected arrival time so in the event that the traveler doesn't arrive at the set time the destination person must take necessary action to initiate a contingency plan.
- Check the driver's fitness, (physically and mentally) and agree with him rest time schedule during the trip. For this schedule refer to.

Alcohol and Drugs Policy

Drugs and alcohol are restricted and forbidden at all PSI OFFSHORE & OILFIELD SERVICES LTD premises and work sites

New employee induction training

All new employees will be informed of PSI OFFSHORE & OILFIELD SERVICES LTD's safety rules and regulations in the course of their introduction to the site. Such information will cover fire prevention regulations, protective equipment, permits-to-work, accident reporting procedures, and other major safety points. The HSE Section will ensure that each new employee is issued with the relevant Safety literature and personal protective equipment.

New employees are advised to check with their immediate Supervisor if any doubt as to the correct safety measures relating to their occupation.

The following table identifies the main outlines of new employee HSE induction:

PSI OFFSHORE & OILFIELD SERVICES LTD'S Environmental Policy	<ul style="list-style-type: none"> • Do not destroy any vegetation or disturb wildlife • Collect and return trash to camp each day • Prevent spills by using protection and following fueling procedures. Clean up and report all spills immediately.
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	<ul style="list-style-type: none"> • Collect and return trash to camp each day • Report any archeological sites or remains found in the work sites
PSI OFFSHORE & OILFIELD SERVICES LTD'S Transportation Policy	<p>All drivers must be assessed & trained prior to driving any PSI OFFSHORE & OILFIELD SERVICES LTD vehicle</p> <ul style="list-style-type: none"> • All occupants must wear seat belts. Report vehicle deficiencies to Mechanics • Check fuel, fluid levels, tracks, tires, survival kits, first aid kits, fire extinguishers before departure every day. • Location of fuel, fueling procedure to be carried out by fuel man only. • Journey Management requires all drivers to complete requirements before travel to and from work sites. • If your vehicle does not return within 1 hour after JM ETA, man lost called. DO NOT PANIC & STAY WITH VEHICLE.
PSI OFFSHORE & OILFIELD SERVICES LTD'S Drug & Alcohol Policy	Drug and alcohol are restricted and forbidden at all PSI OFFSHORE & OILFIELD SERVICES LTD's premises and work sites
PSI OFFSHORE & OILFIELD SERVICES LTD's No Smoking Policy	Smoking permitted only at designated area
PPE	All issued PPE gear must be worn where appropriate. Return any worn out or damaged gear for replacement.
HSE Responsibilities	Job Description - discuss contents and ask new employee to sign it to document they understand their responsibilities
HSE MS	<ul style="list-style-type: none"> • Near Miss/Unsafe Condition - Report to Supervisor, or HSE department • Incident Reporting - All incidents resulting in injury/damage must be reported IMMEDIATELY • Safety Meetings - Attendance by all crew members allows for active participation to solve problems
CAMP SAFETY	
Camp Tour	Facilities - Mess, Showers, Toilets, Clinic, Fire Alarm & Meeting Point.
Meal Times	As established by camp boss management
Fire Prevention	First Action, Fire Extinguishers, Alarm, Meeting Point, Fire Team
Medical Facilities	Clinic for minor illness/injury, Medevac to hospital for major incidents, medical history
Health & Hygiene	Shared facilities - infection, leave toilets clean,

	wash hands before meals, after toilet.
Restricted Areas	Workshop, Generators, Kitchens.
No Smoking Areas	All offices/workshop trailers, sleeping facilities, mess hall & fuel areas. All vehicles
Hazardous Substances	There are some dangerous substances (e.g. battery acid).
FIELD SAFETY	
General Precautions	Do not do any job without a prior permission
Protection from Elements	Protection from heat, wind & sun in summer - Drink plenty of water in summer-time and Cold in winter time.
Heavy Equipment	Don't walk or drive near active equipment without approval from operator
* I confirm that during the induction session I have received instructions on the topics checked above	
Name:	Signature:
Date:	Start/Finish time:
Conducted by:	Position:

The Management System:

It is required to review the Management System of the operation where the accident occurred. The reporting relationship and the lines of communication may also reveal the problems. The clues, constraints and facts discovered should be verified as carefully as possible. Based on the investigation the remedial actions should be proposed.

Analysis:

The clues, constraints and facts discovered should be verified and analyzed to determine;

Recommendations:

Following on from the fact-finding and analysis, the investigators must make recommendations to prevent recurrence of each of the failures that caused the incident. The recommendations should be in the form of specific actions that are capable of being implemented with an identified action party and time for close out.

Follow up:

The HSE Section shall measure, on regular basis the effectiveness of control of the corrective action and recommendations.

Monitor for Re-occurrence:

The HSE Section through regular inspections will monitor the system and the process to ensure the prevention of re-occurrence.

Incident Records

Incident records are essential aids to the prevention of incidents. They show the type of incidents most frequently encountered, where they occur and their relative severity. A further evaluation of these records will emphasize common hazards, and prompts a better understanding of the cause of accidents and most effective methods of preventing them.

5. Auditing and Reviewing

In this new HSE plan an examination of the whole system to assess how it has been used and to ensure that it has operated as intended and a reviewing process should take place every six months so as to determine whether or not HSE management system elements and activities conform to planned arrangements, and are implemented effectively. Identification of areas for improvement and determination of effective functioning of the HSEMS in fulfilling HSE policy, objectives and performance criteria are very essential.

Our senior management should, at appropriate intervals, review the HSEMS and its performance, to ensure its continuing suitability and effectiveness. This review should address the possible need for changes to the policy and objectives, in the light of changing circumstances and the commitment to strive for continual improvement so reviews should be used to reinforce continuous efforts to improve HSE performance. Auditing is very beneficial to us so we may suggest remedial measures to overcome problems by noting some recommendations. So by reviewing what has been audited, we can evaluate the level of HSE implementation and put consequence amendments to HSE plan and other HSEMS elements and documentation.

Emergency Response Plan

- **Targets**
 - Minimization of risk to human life, environment and assets.
 - Availability of information within effective system.
 - Availability of effectiveness of management system during contingency.
- **Risk Assessment**
 - The emergency response plans shall be based on an assessment of the credible risk associated with the activities to be undertaken and these can be Fatality, serious injuries, illness, disease, Fire and/or explosion
- **Road accident**
 - Environment pollution

- o The plan shall be designed according to work activities and the surrounding circumstances so before commencement of any work emergency response plans shall be delivered to work site supervisor or line manager.
- **Medevac Procedure**
 - Procedure Details**
 - o PSI OFFSHORE & OILFIELD SERVICES LTD's HSE plans this procedure, and give training to all he's crews to follow it and carried out for any emergency, in the event of an incident with the serious injuries or illness
 - o Check that the Incident scene is safe to enter, before proceeding into area ensuring own personal safety.
 - o Ensure the casualties are removed from any further area as quickly and safely as possible.
 - o Qualified Doctor / Paramedic, First Aiders, will administer immediate first aid.
 - o The Supervisor on scene should evaluate the situation and immediately inform Civil / HSE Supervisor who will also be the Medevac Coordinator, and pass the following information on.
 - o Who you are
 - o What's your location (coordinates)
 - o What types of injuries are and number of casualties
 - o What assistance you require
 - o The Civil / HSE Supervisor will pass all relevant information on site work and head office in Tripoli. The Civil / HSE Supervisor will inform all radio users when normal radio transmission can resume i.e. (when the Emergency is declared over).
 - **Type of Response**
 - o The Civil / HSE Supervisor will also act has the Medevac Coordinator, who then will decide which course of action needs to be taken.
 - o Doctor, Paramedic, First Aiders, Ambulance, to the scene of the Incident.
 - o Casualties to be brought to a pre-arranged designated location and met by either ambulance or Aircraft.
 - o Casualties brought directly to campsite Clinic.
 - o Casualties to the nearest Hospital, If the casualties require long term hospitalization, initiate International SOS Medevac