

	HSE POLICY AND COMPANY SAFETY PHILOSOPHY			
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REVISION No.	DATE	DEVELOP BY	REVIEWED BY	APPROVED BY	DESCRIPTION
RV01	04-12-23			TIM TIAN	ISSUE FOR SUBMISSION
RV02					
RV03					

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1. HSE POLICY

We recognize and embrace our legal obligations under the Factories Act LFN 1990, the EGASPIN 2002 and all applicable regulations, legislations and other requirements to which we subscribe that relate to our HSE hazards; to protect the health and safety of our employees, trainees, visitors, contractors, host communities and members of the public.

FEVCOM shall continue to pursue the goal of no harm to people and protect the environment as far as is reasonably practicable. Keeping in mind the organization's legal and moral obligations to provide a safe, healthy and environmentally acceptable workplace, we are committed to implement and uphold an effective HSE Management System in line with the requirements of ISO 45001:2018 and ISO 14001:2015 standards.

To accomplish the foregoing, FEVCOM is committed to:




- Prevention of injury and ill health and continual improvement in HSE management and HSE performance.
- Continue to identify hazards and assess risks to health and safety.
- Ensuring that our HSE policy & management system is communicated to all persons working under the control of FEVCOM with the intent that they are made aware of their individual HSE obligations.
- Setting HSE objectives and targets as part of our overall improvement programme that are reviewed periodically.
- Ensuring that HSE aspects are taken into consideration when planning a change/development in a business activity and/or process and work must be suspended when it is believed that essential safety systems are not in place.
- Include HSE performance in the appraisal of staff and rewards accordingly.
- Involve the right people in decision that affects equipment and procedures no matter the urgency.

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- Provide and maintain safe plant, equipment and systems of work that are free of risk to health and safety.
- Establish and maintain appropriate training programs designed to make every employee competent to carry out his or her responsibilities with respect to this policy.
- Ensuring adequate and appropriate resources are allocated to fulfill this policy.

This policy will be made available to all employees and interested parties. It shall be reviewed annually to ensure its continuing suitability and effectiveness and takes into account current and future nature and scale of activities and services of the organization. We expect employees to take all reasonable steps to protect their own safety and that of others and to co-operate with management in the implementation of this policy.




As technology advances and regulations change, FEVCOM will continue to improve systems, reduce waste and efficiently utilize resources to meet the environmental challenges of the next century.

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2. SAFETY POLICY

FEVCOM believes that good Safety Performance is an integral part of effective and profitable business management, as such; the following principles guide the company actions in all areas of operation:




- People are the project's most important asset.
- All risks can be controlled
- Safety, positive community relations, environmental protection and security are line management responsibilities.
- Management has the responsibility to train employees to work safely and develop a “work safe” culture.
- Working safely is a condition of employment
- No task is so urgent that it cannot be performed safely.
- Working safely makes financial sense.

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3. HEALTH POLICY

FEVCOM is to operate a healthy workplace with no health incidents and to improve the health awareness of personnel and its subcontractors

- Pre-employment medical examination consisting of Blood screen, General Physical Examination and TB Test.
- Minimize exposure to hazardous substances, noise, vibration, chemical handling, manual lifting, and any other potentially dangerous situations.
- Apply preventative measures in safeguarding against malaria and other diseases.
- Field material and equipment shall be appraised to control health risks. Those proven or known to be injurious to health shall be discarded or minimized with use of the MSDS control.
- Work site supervision will be very intensive in the area of controlling hazards and their effects.
- Pelfaco Limited shall have available nurses at project site.
- Health staff shall ensure disease-vector control in accommodation areas and caterers serve that good quality food and water (where applicable).
- There will be no use or possession of intoxicants or illicit drugs by any person on any of the project work sites or base compound. Persons found to be in possession or under the influence of such substances shall be terminated from the job.

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4. ENVIRONMENTAL POLICY

FEVCOM activities will be carried out in such a manner that adverse impact on the environment will be minimal and insignificant. Project execution plans/programs will be tailored meet international, national and company environmental standards.

The strategy will be as follows:

- The environmental impact of each of the Company activity shall be routinely monitored and controlled and where necessary corrective action applied.
- All practical measures shall be taken to minimise the generation of waste and to manage and dispose of unavoidable waste in an environmentally acceptable manner.
- Wastes generated as a result of Company activities shall be managed in accordance with the Waste Management Procedure and waste streams shall be monitored and a recorded, with efforts taken, to reduce emission or discharge of waste known to have negative impact on the environment.
- Noise, air, soil and water pollution shall be monitored and mitigated in accordance with the E.I.A Report.
- All chemicals shall be transported, stored, used and disposed of in an environmentally acceptable manner. No chemicals shall be ordered or be accepted from a supplier without being accompanied by the appropriate SDS.

Resources shall be provided and contingency plans developed to respond to spills or any other environmental incident in a timely manner, in accordance with the Hazard ID and Risk Assessment.

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5. NIGHT DRIVING POLICY

FEVCOM disallows night driving in all her land operation. There shall be no night driving of vehicle, except on emergency cases. Night driving on emergency cases must be approved by company and/or Client's management. Any violations will be met with a serious reprisal.

6. ENVIRONMENTAL PROTECTION POLICY

All operations of FEVCOM shall be planned and executed in such a planned and executed in such a way as to minimize any adverse effects or impact on the environment in which we work.

FEVCOM shall promote and encourage plans, activities, and programmes aimed at environmental preservation and protection.




Staffs are encouraged to pay appropriate regard to the environment by protecting it from adverse effect.

All wastes generated in course of our operations must be collected, handled, treated and disposed of in an environmentally sound manner.

Discharge of pollutants into air, or in water bodies is strictly prohibited.

All such disregard to environmental laws must be reported immediately.

"The Environment is our common home, we must protect it"

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7. COMMUNITY RELATIONS POLICY

For enhancement of harmonious relationship between the Company and host Communities with the aim to ultimately reduce operating costs, and shutdown culminating from unhealthy Company Community relationship, FEVCOM shall engage 60% of the non-skilled work-force from the Local/host Community.

FEVCOM shall engage a Community Liaison Officer who shall liaise between the Community and the Company on matters such as employment of indigenous workers and Community Development Projects.




The implementation of the Community Relations Plan shall be the responsibility of the Community/Corporate Affairs Department.

FEVCOM has it as a policy and function to manage Community affairs as an integral part of the Company's business with a view to maintaining good relationship between the Company and her host Community.

FEVCOM shall therefore cooperate and develop interface with the Client and third parties to avoid unnecessary delays, shut down and of course unwarranted loss of man-hours.




Prior to mobilization/movement to any locality, FEVCOM shall pay a visit to the Community Chiefs and Leaders.

Any Community disturbance or threat shall be reported to Client without delay.

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8. COMMUNITY LABOUR POLICY

1. In line with present realities, all skilled community labour who might be engaged for a period of one month and above must be medically tested. Skilled labour shall include welders, pipe fitters, electricians and such artisans.
2. There shall be a fitness test for all skilled and unskilled personnel who shall be engaged, this will involve both physical and medical fitness tests, before engagement for all jobs lasting between half a day and one week.
3. Swimming test shall be conducted on all (labour) workforce who shall be engaged for a period of one month and above.
4. Local labour to be employed must be eighteen years and above.

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9. SECURITY POLICY

FEVCOM has it as a policy and function to manage Security Affairs as an integral part of the Company's business to minimize the number of security related incidents for all Staff, Client's and Third-party Personnel involved in her operations.

To ensure the implementation for this policy, the Company shall engage adequate number of trained resource personnel. The company shall engage a Chief Security Officer as middle management personnel who should organize, co-ordinate and implement all the company's security ideals and programs. In addition to company's unarmed security operatives, the service of a licensed and professional security organization shall be secured on retainer-ship to act as support to the company's System. The services of armed security agencies, such as Police Mobile Police Force, shall be sought in very rare circumstances such as riots, and armed attacks.




At Project locations, local security men shall be used to protect the company's equipment and facilities in a bid to forge good rapport between the company and the host community.

Owing to cases of threats, piracy, armed robbery and community mob actions/assault, that characterize our operations in the Swamp, Site Security shall be improved upon by using trained/armed security met to avert any danger and enhance security emergencies management.

Security work gadgets such as walkie-talkie, torches, uniforms, batons shall be provided to enhance their services.

Security training/drills shall be conducted for increased security awareness.

The Chief Security Officer shall be the focal point and shall develop database for enhanced security management system.

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10. SEAT BELT POLICY

Safety Belt is an employee's best chance of surviving an automobile collision or accidents, and can reduce the risk of moderate, serious or fatal injuries in a crash by as much as 60%.

It is therefore mandatory by this policy that every worker whose work demands the use of Safety Belts to wear them especially while on Company's business and must be properly buckled always, as safeguards against any on towards event.




All light crafts and heavy-duty crafts such as trucks, tractors, forklifts, etc. must have seat belts fitted in them for use by the drivers or operators. The back seats of all light crafts shall additionally be fitted with seat belts.

The **"No Seat Belts, No Exit"** or **"No Seat Belts, No Entry"** rule shall be enforced at the gate or point of entry into Company Premises or facilities by Security Officers. They should carry out visual inspections on any company or other vehicles entering or leaving premises to ensure all occupants comply with the directive.

Safety Officers are empowered to stop any operation wherein there is an obvious breach of this policy. Foremen, Supervisors and indeed other members of line management shall monitor and ensure that everyone in Company owned vehicles fastens his or her seat belt as required.

Appropriate disciplinary action may be taken against any staff who violates this policy directive.

BELT UP & LIVE!!!

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11. EQUIPMENT MAINTENANCE POLICY

All equipment MUST be regularly maintained. All unserviceable equipment shall be locked out and tagged as thus.

The objective of such routine Preventive maintenance is to reduce equipment Downtime and Lost time incidents resulting from lack of maintenance.

Routine maintenance and minor repairs shall be undertaken at the work site, while serious maintenance of completely broken down equipment shall be done at the base.

Turn around maintenance shall be planned and executed once a year. The aim being to put all equipment in serviceable order for hitch free operation/use.




It is mandatory that equipment operators report immediately any break down or faults observed in their equipment. Late reportage of faults shall be met with appropriate reprisals.

Toolbox meetings on proposed equipment maintenance MUST precede the maintenance work planned for each day.

All maintenance Crew must be trained and only experienced personnel shall be job placed and authorized to carry out maintenance.

All maintenance work shall be carried out in accordance with the Company's safety maintenance procedures. The maintenance crew must be briefed before each maintenance episode.

The implementation of the maintenance policy shall be the responsibility of the Maintenance Engineer, who should report to the Operations Superintendent/Project Manager.

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12. NIGHT SAILING POLICY

FEVCOM disallows night sailing in all her swamp/marine operations.

There shall be no night steaming of vessels/boats, except on emergency cases.

Night steaming on emergency cases must be approved by company's Management.

Any violations will be met with very serious reprisals (e.g fine, suspension from work without pay or contract termination).

13. STOP WORK POLICY




All operations of FEVCOM Shall be planned and executed in such a way as to:

- Prevent injury
- Ensure safety & security of employees' lives and property
- Minimize any adverse effects on the environment.

Every employee of FEVCOM Shall therefore perform his or her work in accordance with this policy.

Stop any unsafe act observed. Use STOP WORK Authority.

In addition, work must not start or must be suspended when it is believed that essential safety systems are not in place.

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14. DRUG, ALCOHOL & WEAPONS POLICY

In the interest of maintaining safe, orderly and efficient operations, illicit narcotics and related materials, alcohol, guns and other weapons/fire arms are completely prohibited.

Their use or possession by employees while working or residing on any job site including all waterborne operations or property/facility under the Control of FEVCOM may result in immediate dismissal.

This rule applies to all operations and locations on a 24-hour basis.




FEVCOM will conduct periodic unannounced searches and screening of employees personal belongings and lockers to assure that no one is in possession of such illegal or unauthorized items.

Employees will be required to submit to periodic alcohol and drug test (URINALYSIS OR BLOOD TESTS) or when specific circumstances warrant, workers will be tested according to DOT regulations for alcohol.

If a suspected worker's urine/blood tests positive for alcohol/drug, such a worker will be rehabilitated by counseling and treatment and will be disallowed from performing safety sensitive duties. Where such a worker indulges in same unsafe act again, then the termination penalty will be applied.

Employees may be subjected to voluntary searches prior to transportation to and from work locations and at all times while on site, warehouse, yard, jetty, company premises or houseboats.

In the event that the Company discovers such illegal or unauthorized items in the possession of an employee, such items and/or materials **MUST** be reported and released to appropriate law enforcement agency followed by a stringent reprisal on such victim with termination of appointment.

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15. PROCEDURES POLICY

It is the Policy of FEVCOM to have in place for all business processes, documented, structured, and up-to-date procedures which give simple but effective instruction to staff to perform their tasks following best practices embodied in Company policies.

It is the responsibility of individual supervisors and staff to identify the need for procedure documentation and/or review in own business area and to liaise with the QHSE Department to carry out same.




It is the responsibility of each staff to adhere strictly to Company approved procedures.

16. PERSONAL PROTECTIVE EQUIPMENT POLICY

- In order to monitor the requisition, issuance and use of PPE in the company, FEVCOM shall follow the under-listed measures to effect the control of the above-mentioned policy.
- All requisitions for bulk procurement shall be raised by QHSE Department.
- Procurement Department shall purchase the requested PPE.
- After procuring, QHSE Department shall inspect the procured PPE.
- Warehouse shall store the PPE after inspection.
- Head of Department shall raise PPE collection form to QHSE Department for cross checking if the worker(s) is due for collection.
- QHSE Department after cross checking will send the collection form for approval before warehouse issues the requested PPE.

The issuance shall be properly logged by the QHSE Department and Procurement Department respectively using staff PPE form.

- PPE shall be replaced once every year and for those involved in drilling operations every 6 months according to statutory requirement.
- In case of theft or damage, a report/investigation will be carried out before reissuance.

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17. WASTE DISPOSAL POLICY

Wastes constitute environmental nuisance if not properly collected, handled and disposed. Wastes shall therefore be collected, handled and disposed off, in an environmentally safe manner as not to cause injury or damage to plants, animals and the environment (the soil, water and air).

Industrial wastes and kitchen wastes shall be collected in bins marked accordingly for onward disposal to Government approved waste disposal center by FEVCOM Waste Vendor.



In all however, proper precautions shall be taken to avoid discharge of pollutants in the air, land or water. Dumping of waste into creeks, rivers and other watercourse is not allowed.

18. CREW CHANGE/ OUTSTANDING MANAGEMENT POLICY

FEVCOM shall recruit capable and competent staff for her operations. These staff shall be posted to various work locations as the need may arise. Staff posted to any location shall not exceed the two-weeks on site period. Thereafter he should be relieved by another staff for a two-week off - site rest (time-off).

No staff shall exceed assigned on-site period, except on special permission received from their respective Head of Department or Project Manager.

Adequate and matching out – station allowance(s) as prescribed in the company's condition of service, shall be paid to such staff posted for off base jobs.

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19. HSE INCENTIVES POLICY

In line with the principles of Enhanced HSE Management, the HSE Incentives Policy shall be used as a tool of motivation for continuous enhancement of the HSE performance of all workers.

CATEGORIZATION:

There shall be incentives in the following categories.

- Quarterly HSE award for the Most Valuable Safety and Hazard Observations.
- Best "HSE" conscious worker of the year.
- Quarterly Award for the best HSE conscious Driver of the year.
- Quarterly Award for the best HSE conscious Operator of the year.

TYPE:

Incentives shall be in award, (CERTIFICATES, GIFTS etc.) and monetary gift to be determined by the Management.



SELECTION:

Selection process shall be made by the central safety committee which shall be anchored by the QHSE Manager.

This policy shall be subject to review in line with the dictates of time.



MANAGING DIRECTOR
CHIEF FELIX EDE

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20. HSE STATISTICS



Below shows our HSE statistics by following this policy.

FEVCOM HSE STATISTIC REPORT



LOCATION: WARRI FEILD

Period: 2018 to 2021

1.	Notable Events of the Week					
	<p><u>Highlights</u> Fatality Free Days –1095 ; LTI Free Days –1095 ; Total Recordable Case Free Days –1095</p> <ul style="list-style-type: none"> • Warri Field Office (WFO): • FEVCOM Base Office: <p>POB – 54</p>					
2.	Service Provision					
	Activity	2018	2019	2020	2018----- 2020	Remarks (Issues from Drills, Inspections, Audits etc.; Types of Activities)
	<u>No. Of Site Inspections</u>	12	11	12	35	
	<u>Pre-Mob inspection</u>					
	Boat/Vessel	6	6	6	18	
	Vehicle	8	7	7	22	
	Project/Contract	0	0	0	0	
	<u>HSE Meetings</u>					
	Monthly HSE Meeting	12	12	12	36	
	Toolbox/Pep talks	260	260	260	780	
	Site HSE Meetings	26	26	26	780	
	Kick-Off Meeting	6	4	1	11	
	<u>Health Mgt.</u>					
	Education/Counseling:	0	0	0	0	
	Malaria, Yellow fever,	0	0	0	0	
	Hepatitis B &C, etc	0	0	0		



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HIV/AIDS Awareness, Work				0	
Life Balance	49	108	108	108	
Medical Fitness Test	0	0	0	0	
Food handlers hygiene test					
<u>Audits (Internal &</u>	2	1	1	1	
<u>External)</u>	0	0			
<u>Drills Conducted</u>	12	12	12	12	



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<u>HSE Training</u> Staff Induction, Fire Emergency, Other HSE Trainings, etc.					
	54	60	20	132	
	0	0	0	0	
	12	12	12	36	
<u>Certification</u> Swimming HUET BOSIET Driving (DDC1) Others					
	46	5	1	52	
	0	0	0	0	
	5	2	1	8	
	0	0	0	0	
	0	0	0	0	
HSE Studies and Reviews					
Personnel On Board (POB)	54	54	45	153	

3. Monthly HSE Data						
HSE Data				YTD Cumulative		
UA =	108	97	121	326		
UC =	54	48	66	168		
Man hours (Contractors) =	20460	1850	1600	5910		
UA/UC/Million Cont. Mhrs. =						
Man hours (Staff) =	163,780	125,370	130,670	419820		
UA/UC/Million Staff Mhrs. =						
Near Miss =	53	84	32	169		
FAC =	1	2	1	4		
MTC =	53	45	31	125		
RWC =	0	0	0	0		
CD =	0	0	0	0		
MEDEVAC =	0	0	0	0		
RC =	0	0	0	0		
OPC =	70	65	70	205		
Minor RTA =	0	0	0	0		

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	Major RTA	0	0	0	0	
	Fatality =	0	0	0	0	
	3 rd Party Fatality =	0	0	0	0	

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Fatality Free Days =	365	365	365	1095	
LTI (Less Fatality) =	0	0	0	0	
LTI Free Days =	365	365	365	1095	
TRC Free Days =	365	365	365	1095	
Oil Spill Incident =	0	0	0	0	
Fire Incident =	0	0	0	0	
TRCF =	0	0	0	0	
LTIF =	0	0	0	0	
RTAF =	0	0	0	0	
Dangerous Occurrence =	0	0	0	0	

4.	General Issues Concerns/blockers/showstoppers, Lateral Learning, HSE Initiatives implemented, Request/Call for Information & Assistance, Staff Movement:
----	---

5.	Look Ahead (<i>number of service planned to be provided</i>)				
	Activity	Outs from current year	No. Planned for next year	Total Planned	Remarks
1	Track MFI schedule implementation	0	0	0	
2	Track MFI recommendations with the relevant teams	0	0	0	

*** List of acronyms/abbreviations**

6. Details of Significant Incidents

Restricted Work Case: - 0	Medical Treatment Case: - 0	Fatalities: - 0
Lost workday Case: - 0	Occupational Illness: - 0	Assault: - 0
Road Traffic Accident: 0	Near Misses: - 0	Others: - 0

7. List of Grouped Summaries of Near Misses:19



8. List of Grouped Summaries of Unsafe Act: 185

9. List of Grouped Summaries of Unsafe Condition: 60

10. Pending Action Status

TOTAL ACTION ITEM(S): 104

OVERDUE ACTION: 0



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CLOSED ACTION: 104

CURRENT ACTION STATUS: 0

KEY

LTI = LOST TIME INCIDENT

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RWC = RESTRICTED
 WORK CASE MTC =
 MEDICAL TREATMENT
 CASEFAC = FIRST
 AID CASE
 RTA = ROAD TRAFFIC
 ACCIDENT DO =
 DANGEROUS
 OCCURRENCEUA
 = UNSAFE ACT
 UC =
 UNSAFE
 CONDITIONNM
 = NEAR
 MISS
 CD =
 COMMUNITYDISTURBA
 NCEMEDEVAC =
 MEDICAL EVACUATION
 OS = OIL SPILL
 RC =
 REFERRAL CASES
 OPC = OUT
 PATIENT CASES
 LTMC = LOST
 MED. CASES
 POB = PERSONNEL ON BOARD