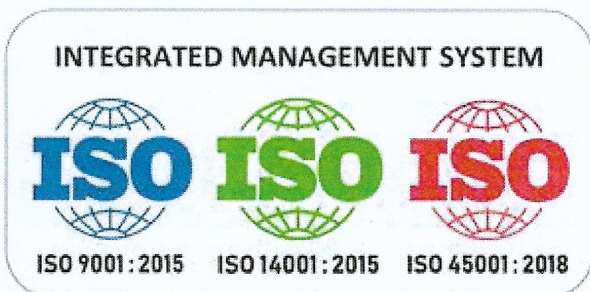


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DARREN GULF CO.
QHSE Management System Manual

(ISO 9001:2015; ISO 14001:2015, OHSAS45001:2018)



Revision: 00
 System Effective Date: **28.01.2020**

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QHSE MANUAL

Management System

FOREWORD

DARREN GULF CO. is committed to protecting the Quality, health and safety of Organization process and employees who plays a part in our operations, lives in the communities which we operate. Wherever we operate, we will conduct our business with respect and care towards both local and global environment and systematically manage risks to drive sustainable development. We will not be satisfied until we succeed in eliminating Quality aspects, all injuries, occupational illnesses, unsafe practices and incidents of OHS harm from our activities.

In order to create a positive working environment, it is essential that all employees perform their duties in a manner consistent with accepted best working practices guideline by QHSE Management system.

This Manual is provided as an aid to each employee of **DARREN GULF CO.** fulfilling his responsibilities as they relate to Quality of work safety and accident prevention work aspects. It covers many, but by no means all, of the situations encountered in our daily operations. If situations arise that are not covered by information covered in this book, the **GM/MD/Operation Manager** or QHSE Manager/ Representative should be consulted.

It is only through teamwork that we can hope to maintain the best possible work environment.

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Reference

Appendix A: Quality & Heath Safety Policy

Appendix B: Organization Chart


Appendix C: QHSE team


All SOPs / Supporting Forms

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A. AUTHORIZATION SIGNATORIES

Prepared by	:	
		
Name	:	SANOOP SYED
Designation	:	HSE MANAGER

Approved by	:	
		
Name	:	SIDHIK K P
Designation	:	OPERATION MANAGER

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REVISION HISTORY

Current Revision	Details of Revision/ Change	Effective Date
00	Initial issue	28.01.2020

B. DISTRIBUTION OF CONTROLLED COPIES

Copy No.	To be issued to
Master Copy	GM/MD/Operation Manager
1	Users copy for reference with QHSE Team Leader

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Section I. QHSE Management System

C. COMPANY PROFILE

C.1. General

Darren Gulf Company is one of the leading transporting and equipment rental company in Kuwait established in 2011, renting transporting vehicles and heavy and light equipment's and machineries throughout Kuwait.

Darren Gulf Company identifies the customer's requirements and tries its best for highest degree of customer satisfaction.

C.2. Services

The scope of **DARREN GULF CO.**, covers:

- Renting transporting vehicles and heavy and light equipments and machineries throughout Kuwait.

Major Customers/ Clients

- Kuwait Drilling Company.
- Hyundai Engineering and Construction
- Gharbia International
- Bohai Drilling Company
- Aggreko
- John Energy
- Toa Corporation
- C K Drillings
- Sungchang E & C
- Seobon
- Gusan
- Alhamad Sons
- Kukje Plant Co.

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1. SCOPE

1.1. General

The QHSE Management System ensures **DARREN GULF CO.** commitments towards interested party's satisfaction, occupational safety of all employees.

The adoption of QHSE Management System is a strategic decision of **DARREN GULF CO.** The design and implementation of QHSE Management System is influenced by varying needs, particular Objectives/KPI, the services provided, the processes employed and the size and structure of the organization.

DARREN GULF CO. QHSE Management System:

- Demonstrate its ability to consistently provide services that meets interested parties and applicable regulatory requirements, and
- Enhance interested parties satisfaction through the effective application of the system, including processes for continual improvement of the system and the assurance of conformity to customer and applicable regulatory requirements.

1.2. Scope

DARREN GULF CO. QHSE Management System is applicable to all activities at Kuwait

The scope of certification for the QHSE Management System is as follows:

1.2.1 QHSE Certification Scope

DARREN GULF CO., provides a variety of in-country support and local assistance to companies and agencies, both governmental and commercial across Kuwait, including the oil and gas industry.

2. REFERENCES

The following international standards are referred, while developing **DARREN GULF CO.**'s Integrated Management System:

ISO 9001:2015 Quality Management System – Requirements

ISO 14001:2015 Environment Management System – Requirements

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OHSAS-45001:2018 Occupational Health and Safety

Apart from this company general information is taken from company website

3. TERMS AND DEFINITIONS

Sr.	Term	Definition
1	Organization	DARREN GULF CO.
2	Supplier	Who provides services to DARREN GULF CO. , Sub-contractors to DARREN GULF CO. Vendors to DARREN GULF CO.
3	Customer	To whom DARREN GULF CO. provides services
4	Interested Parties	person or group, inside or outside the workplace , concerned with or affected by the performance of an organization e.g. parent company , shareholders , government agencies
5	QMS	Quality Management System
6	EMS	Environment Management System
7	QHSE	Quality , Heath Safety and Environment Management System
8	Quality	degree to which a set of inherent characteristics fulfils requirements
9	TL	Team Leader
10	CFT	Cross Functional Team
11	Document	Information in the form of hard copy / electronic used to perform activity.
12	Record	Output of activities used as evidence
13	NC	Non-Conformity / Non-Conformance Any activity that is not as per the requirements of DARREN GULF CO. Management / ISO 9001 / ISO 14001/ OHSAS 45001
14	Correction	Immediate action taken on the NC to stop it
15	Corrective Action	Long-term action taken on the root cause of detected NC, so that it will not re-occur again.
16	Preventive Action	Long-term action taken on the root cause of potential NC, so that it will not occur again.
17	Audit	Systematic, independent and documented process for obtaining "audit evidence" and evaluating it objectively to determine the extent to which "audit criteria" are fulfilled.

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4. CONTEXT OF THE ORGANIZATION

DARREN GULF CO. provides support services to its clients in state of Kuwait. These services include **(Actual Certification Scope)** renting transporting vehicles and heavy and light equipments and machineries throughout Kuwait.

However during provision of such services there may be some **external issues** arises from different Ministries from state of Kuwait e.g. changes in laws etc. All Such issues are time to time reviewed and analyzed by **DARREN GULF CO.** team at Kuwait. Also for **internal issues** like employees turnover, conflicts, cultural gaps, etc. are effectively handled by **GM/MD/Operation Manager**.

At **DARREN GULF CO.** the interested parties are - Customers, Shareholders, and Different Ministries of Kuwait. **GM/MD/Operation Manager** meets his team on weekly basis to under standards its client's requirements and ensure its being fulfilled. All requirements from different Ministries of Kuwait (Also Kuwait Environment Protection Authority – KEPA) have been reviewed on regular basis by **GM/MD/Operation Manager** and his team.

In order to function effectively and efficiently, **DARREN GULF CO.** has identified and managed numerous linked activities. An activity using resources, and managed in order to enable the transformation of inputs into outputs, is considered as a process. Often the output from one process directly forms the input to the next.

The application of a system of processes within an organization, together with the identification of interactions and managing of these processes can be referred to as the "process approach".

The processes in **DARREN GULF CO.** can be categorized under 2 groups as:
 Core Business Processes – This describes the Core Business of the company
 Support Processes –supporting Processes for managing the Core Business Process of the companies

Core Business Processes

- BP 1 Rental of Heavy and light equipments
- BP 2 Project Management
- BP 3 Testing and Commissioning
- BP 4 Supply of equipment's band manpower

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Support Process

- SP1 Human Resources
- SP2 Accounts and Finance
- SP3 Sales
- SP4 Legal

5. LEADERSHIP

5.1. Leadership and commitment

DARREN GULF CO. Cross Functional Team (CFT) has developed this QHSE system and demonstrates its commitment through:

- Establishment of policies and Objectives/KPI
- Establishment of CFT to review and monitor QHSE
- Review of entire QHSE on quarterly basis
- Ensure effectiveness of QHSE by conducting internal audits, Aspect impact study and Risk Assessment
- Evaluation of legal compliance

Reference – Weekly Progress Meetings

DARREN GULF CO. is customer focused organization and it can be demonstrated as

- Measuring and monitoring customers' feedback
- Handling of customer complaints effectively and efficiently

5.2. QHSE Policy(Appendix-A)

DARREN GULF CO. Management has developed QHSE policy that:

- is appropriate to the purpose of the organization,
- includes a commitment to comply with requirements and continually improve the effectiveness of the QHSE Management System,

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- provides a framework for establishing and reviewing business Objectives/KPI,
- is communicated and understood within the organization by meetings / displaying at prominent locations ,
- is reviewed for continuing suitability

Reference - QHSE Policy

5.3. Roles, Responsibility and Authority

DARREN GULF CO. has established the Organization structure (chart) with proper reporting. The job description for each title in organization chart has been established & communicated to the concerned.

Appendix-B

QHSE Team Leader

Mr. SANOOP SYED has been appointed as the QHSE Team leader. Apart from his regular roles and responsibilities, being a Team Leader for QHSE Management System he has to perform following tasks:

- Ensuring that process needed for QHSE Management System are established, implemented and maintained.
- Reporting to **GM/MD/Operation Manager** on the performance of QHSE and need for improvement.
- Ensuring the promotion of awareness of QHSE throughout **DARREN GULF CO.**

QHSE Team

QHSE Team is formed for effective implementation of QHSE Management System. Team members:

- Ensure that processes needed for the QHSE Management System are established documented, implemented and maintained.
- Report to QHSE TL on the performance of the QHSE Management System and any need for improvement.

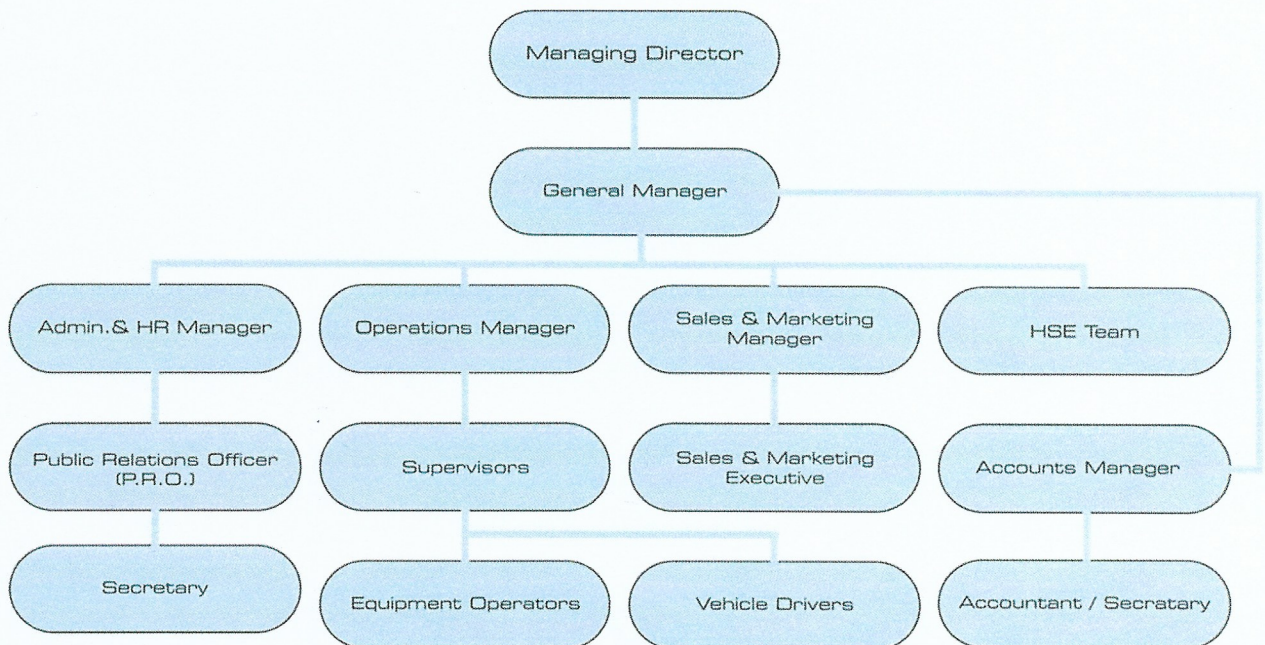
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- Ensure document & record control system at their respective areas.
- Identify respective Key Performance Areas (KPA). Collect and analyze data on these KPAs for appropriate actions.
- Keep track of Action Request Reports & data (Business Objectives/KPI) for the Management Review Meeting.
- Ensure that Internal Auditing is conducted as per plan.
- Ensure the promotion of awareness of customer (Internal & External) requirements in respective area & ensure customer satisfaction.

DARREN GULF CO. has established the Organization structure (chart) with proper reporting. The job description for each title in organization chart has been established & communicated to the concerned.

Reference - **Organization Chart (Designation wise) Appendix-B, C**



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6. PLANNING

6.1. Risk and Opportunities

DARREN GULF CO. team meets on weekly basis to address all business threats and adequate control for it. QHSE Team has done environment aspect impact study and Risk assessment in order to address all risks and its control.

This Aspect Impact study and Occupational Hazard Risk assessment reviewed on regular basis as per established SOP.

6.2. Objectives and its Planning

DARREN GULF CO.GM/MD/Operation Manager has established business Objectives/KPI, including those needed to meet requirements for services at relevant levels within the organization.

The businesses Objectives/KPI are measurable and consistent with the QHSE policy. Strategic Actions plans are established and reviewed to ensure that this Objectives/KPI are met.

Reference: Business Objectives & KPIs

6.3. Planning of Changes

Whenever there is any change in QHSE management system due internal or external environment , **DARREN GULF CO.** Management ensure proper planning is done during its weekly progress meeting and adequate resources are made available in order ensure proper changes in QHSE management system

7. SUPPORT

7.1. Resources

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DARREN GULF CO.GM/MD/Operation Manager determines all the resource requirements in weekly progress meeting. Finance ensures annual budget covers all the resources needed to implement and maintain the QHSE Management System and continually improve its effectiveness, and to enhance customer satisfaction by meeting customer requirements.

Human Resources are provided and monitored by HR department.

Financial resources are provided and monitored by Finance department.

Infrastructure are provided and monitored by Top Management.

Good and safe Work environment in terms of occupational safety and protection of environment perspective are ensured and arranged by QHSE Manager.

At **DARREN GULF CO.**, **Organizational Knowledge** is considered as intellectual asset of company. All business critical issues and actions taken are recorded as **lesion learned** and archived as electronic file.

This information shall referred as and when required for future actions


7.2. Competence

DARREN GULF CO.'s Head of HR & Administration:

- Provides or arranges required qualified & competent manpower.
- Ensures the competence of existing manpower by arranging training to concerns.
- Ensures personnel performing work affecting service quality, environment and work safety are competent on the basis of appropriate education, training, skills and experience.
- Determines the training needs for all employees.
- Maintains appropriate records of education, training, skills and experience.

For QHSE related trainings, QSHE Manager prepares Training Calendar & provides training accordingly. The effectiveness of the training provided is also evaluated.

All personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the business Objectives/KPI.

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7.3. Awareness

QHSE Team Leaders ensure Quality, Environment and occupational safety policies and procedures are well communicated and understood within the organization by meetings / displaying at prominent locations

7.4. Communication

DARREN GULF CO. MD/GM/Operation Manager ensures all information flows effectively & efficiently to all concerned. A team approach is established as part of internal communication.

General Manager Controls following, as part of effective internal communications

- Weekly meetings
- Management Review meetings
- Internal E-mails / Circulars

7.5. Documented information

- All controlled documents at **DARREN GULF CO.** are at Server and in electronic form. All hard copies are considered as uncontrolled.
- Controlled documents include QHSE Manual, HR policies and procedures, Specimen copies of all forms / Reports, etc.
- One hard copy of all controlled documents set is being maintained by HR & Admin.
- Any changes to documents are officially initiated by respective process owners via email to QSHE Team Leader.
- QSHE Team Leader /HOD Operations / QHSE Team Leader shall review the changes and based on its need and impact it will be approved and incorporated.
- All documents active on server is considered as latest version.
- Any updating / revision in documents will be informed to respective process owners via email by QSHE Team Leader.

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- Records all processes are being maintained by respective process owners in hard copies / soft copies as per contractual and legal requirements.
- Mater list of documents is maintained at QSH Team Leader.
- All QMS related records are retained for minimum of 2 years and if required additional also it can be maintained by respective process owners (Refer List of records).

Reference – SOP for document Control

8. OPERATIONS

8.1. Operational planning & Control

DARREN GULF CO. respective section heads or business process owners are primarily responsible for operational planning and its appropriate control. Based on the contract requirements and customer needs daily planning is done and its control is daily reviewed in morning meeting by respective section heads.

On every Sunday morning weekly planning for next week and review of last week planning is done.

8.2. Requirements of services

On every Sunday morning weekly planning for next week and review of last week planning is done.

This is basically corporate function, mainly handled by Business development. All potential leads and business development related activities are being handled with – BD with the help of Departments.

- Seeks new contracts from existing or new clients
- Approach to all approved contractors of Kuwait and presentation of **DARREN GULF CO.** services to them for Kuwait region
- Follow-up with perspective clients
- Develop and monitor comprehensive business Plan

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- Liaison with **Contract Management process owner** in order to get competitive service offers from suppliers.
- Make BD visits , Generate new enquires , Request For Quotations (RFQ) , Quotations , Follow-up to materialize Quotations in to Orders
- Ensure business plan is being followed
- Weekly review with Business development Department.

All Service Contacts from clients before acceptance are reviewed for its legality compliance by Section head Legal.

8.3. Design and Development of services

Designing and developing of service means plan for execution of **DARREN GULF CO.** new services.

It is strategic decision by corporate head office to go new services.

All such enquiries are forwarded to General Manager by Business development for action. Respective Division / Department prepares design plan for execution.

General Manager with the help of respective service section head develops plan for all new services being provided. The plan explains control points, specifications, and method of inspection, relevant records & corrective actions, if any.

In designing of service realization, General Manager determines Objectives/KPI and customer requirements about services, establish the processes, documents, and arranges resources specific to the service / training, if required.


Required verification, validation, monitoring and inspection activities specific to the services and the criteria for new service acceptance shall be decided.

8.4. Control of Externally provided processes, products or services

Being Service provider type of industries, technically all **DARREN GULF CO.** services are externally provided (outsourced) hence its control is explained under Service provision

8.5. Service Provision

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Respective Section heads ensures that all **DARREN GULF CO.** services are done under controlled condition.

Controlled conditions include:

- The availability of relevant procedures / Standards
- The availability of Guidelines / Instruction to Division / Department Heads
- The use of suitable equipment (availability and maintenance of software facilities)

All the services provided by **DARREN GULF CO.** are well established and proven and result of same is monitored subsequently, hence there is no need of process validation.

DARREN GULF CO. logo on documents and Contract number, etc. is used as means for identification and traceability.

Respective Division / Department exercise care with customer property while it is under control. The Division / Department identify, verify, protect and safeguards customer property. If any customer property is lost, damaged or otherwise found to be unsuitable for use, this is reported to the customer and records maintained. Customer property can include contract related documents.

Respective Section Heads has the prime responsibility to purchase services / items for the **DARREN GULF CO.**, Service provider selection, evaluation and re-evaluation, is done as per respective procedure.

Respective Section Heads ensures that all purchasing of Materials /items / service are done through Purchase Orders or Contracts.

The purchase Order or Contract address the following:

- Specification of items
- Price & quantity
- Delivery time & mode
- QHSE related requirements
- Other terms & conditions

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The status of material requisition, Purchase Order status etc. are controlled by Purchasing Section.

All Service providers' contracts before acceptance are reviewed for its legality compliance by Section head Legal.

Contract Management Process

General Manager/ MD/Operation Manager are primarily responsible for execution of all services in effective and efficient manner. General Manager plays vital role in management of all contracts in time and in profit.

At one side he is liaison with Client / customer via Business Development and other end he is liaison with end users (direct customers).

General Manager/ MD/Operation Manager with the help of **Estimation Team**, pulls all requested information by Business development in order to do on time bid submission/ proposal / tender preparation.

Estimation Team shall get pre quotations from suppliers, compile, analyze and forward it to General Manager.

Estimation Team is always in liaison with respective Service Provision Heads in order to get all related information

- Service Provision- Business Development

- Service Provision- Testing and Commissioning

- Service Provision- Equipment Supply

After successful award of Contract, all related information / documents, General Manager forwards it to respective Service Provision Heads via Estimation Team Capture Team plays central archiving role in all Contract Management Processes.

Contract Execution

Contract Execution Meeting shall be conducted internally (with respective Service Provision Head, Estimation Team, HR Head), where all details will be discussed to prepare Contract Execution Plan by Service Provision Head

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Contract Execution Plan shall cover minimum as follows (as applicable)

- Milestone activities
- Bar chart (Time frame)
- Deliverables
- Manpower requirement (budget)
- Material Requirement (budget)
- Expense budget
- Resources required from Management / customers
- Manpower mobilization (if required)
- Invoicing Plan

Service Provision Head shall ensure all resources (material, manpower, and money) are budgeted well in advance in line with Contract Execution Plan. Service Provision Heads in Weekly Progress Meeting shall do all necessary follow-up with General Manager / Top Management in order to ensure resources are available on time

Processes deliverables

- Weekly Progress Reports
- Contract Execution Plan
- Contract Variations

Service Provision- Marketing and Sales



DARREN GULF CO.

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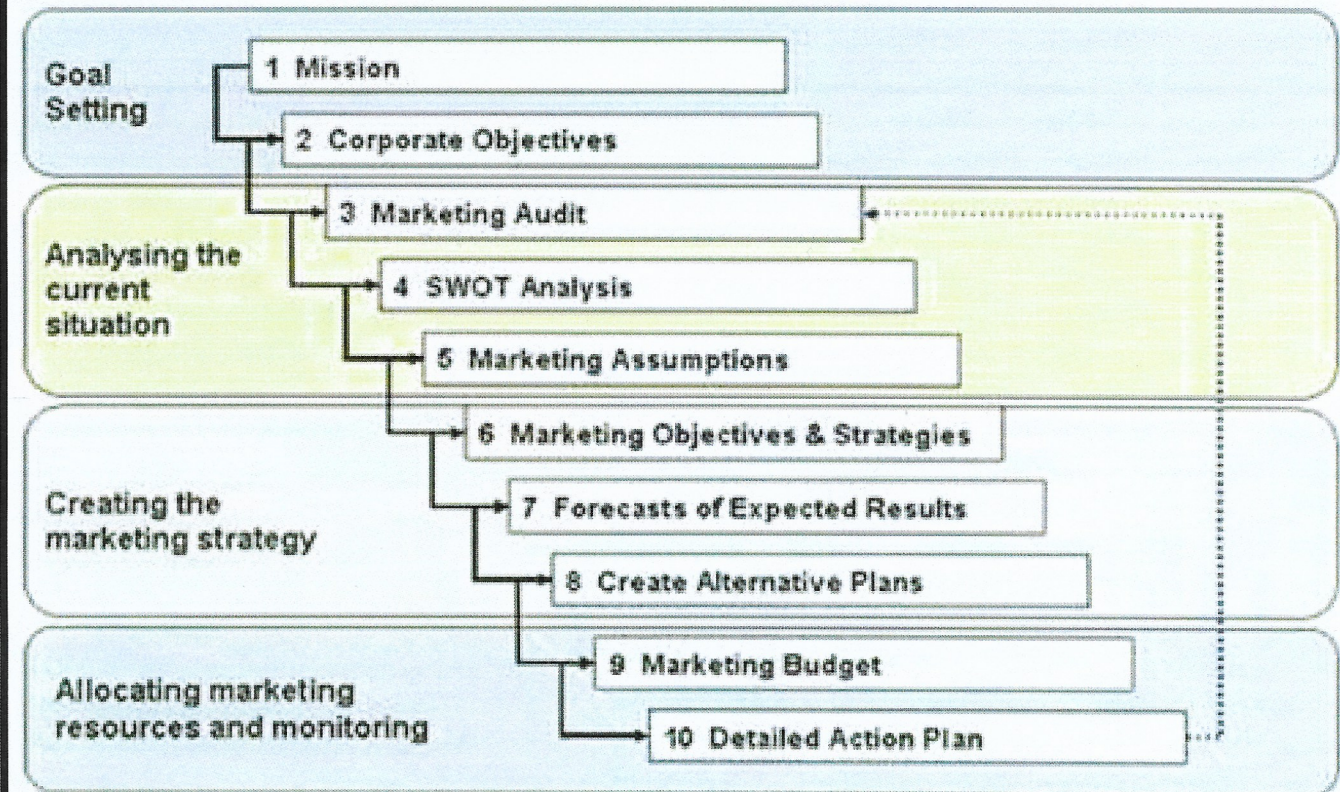
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The Marketing Planning Process



Release of Services

Being service provider type of industry, all **DARREN GULF CO.** services are released or delivered while provision of services, hence its control is explained under section

8.6. Control of Non-Conforming outputs

Control of Non-conforming outputs are treated as Non-conformity and handled as per 10.2 of section of this manual

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9. PERFORMANCE EVALAUTION

9.1. Monitoring, Measurement, Analysis and Evaluation

QHSE members plan and implement the monitoring & measurement of Business Objectives/KPI. **DARREN GULF CO.** analyzes the data for improvement needed to:

- Demonstrate conformity of the processes
- Ensure conformity of the QHSE Management System, and
- Continually improve the effectiveness of the QHSE Management System

This includes determination of applicable methods, including statistical techniques, and the extent of their use.

Customer Satisfaction

QHSE ensures customer satisfaction once in a year by following means:

- By meeting customers on regular basis
- By monitoring customer's suggestions & survey
- Trends in customer complaints

The results of all the above methods are analyzed for appropriate corrective / preventive action and opportunities for improvement.

Data Analysis

QHSE TEAM determines, collect and analyze KPI data to demonstrate the suitability and effectiveness of the QHSE Management System and to evaluate where continual improvement of the effectiveness of the QHSE Management System can be made.

9.2. Internal Audit

QHSE TEAM ensures the establishment of an effective and efficient internal audit process to assess the strengths and weaknesses of the QHSE Management System. The internal audit process acts as a management tool for independent assessment of any designated process or activity. The internal audit process provides an independent tool for use in obtaining objective evidence that the existing requirements have been met, since the internal audit evaluates the effectiveness and efficiency of the **DARREN GULF CO.**

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QHSE TEAM ensures that improvement actions are taken in response to internal audit results. Planning for internal audits is flexible in order to permit changes, emphasis based on findings and objective evidence obtained during the audit. However the normal frequency of Internal Audits is once in 3 months (quarterly).

Subjects for consideration by internal auditing include:

- effective and efficient implementation of processes,
- opportunities for continual improvement,
- capability of processes,
- effective and efficient use of statistical techniques,
- use of information technology
- analysis of quality / environment / safety data
- effective and efficient use of resources,
- process and product performance results and expectations,
- adequacy and accuracy of performance measurement,
- improvement activities, and
- Relationships with interested parties

Audit Schedule

Audit Finding Report

Non-Conformance Report / Action Request Report

9.3. Management Review

QHSE team reviews the **DARREN GULF CO.** QHSE Management System once in 3 months to ensure its continuing suitability, adequacy and effectiveness.

This review includes assessing opportunities for improvement and the need for changes to the Integrated Management System including the Policies and Business Objectives/KPI.

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Review input

The input to management review includes information on

- Results of internal quality audits done by Audit team
- Customer complaints or suggestions.
- Business Objectives/KPI
- Analysis & actions
- QHSE related issues
- Follow-up actions from previous Management Reviews (if any)
- Changes that could affect the Integrated Management System, and
- Recommendations for improvement in processes / Technology

Review output

The output from the Management Review includes any decisions and actions related to

- Improvement of the effectiveness of the QHSE and its processes,
- Improvement of service related to customer requirements, and
- Resource needs

The Minutes of meetings are maintained by QHSE Team Leader as quality record.

10.IMPROVEMENT

10.1. General

General Manager/ MD/Operation Manager along with QHSE team discuss overall improvement, non-conforming, corrective action issues in weekly progress meetings.

10.2. Non Conformity & Corrective Action

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General Manager/ MD/Operation Manager along with QHSE team has established & implemented system for handling of nonconformities in **DARREN GULF CO.**

QHSE TEAM and respective Department Head ensure that any process which does not conform to requirements is identified and controlled to prevent its unintended use or delivery. The controls and related responsibilities and authorities for dealing with nonconformity are with Process owner.

Root causes for any major non-conformances are investigated and discussed in subsequent Weekly Progress Meetings .

Respective Section Heads are monitoring and ensuring that all SOP are being followed e.g.

- Service / product delivery as per contract
- Handling of all service Tickets in time
- Service Targets achievements

Failure to all above is considered as Non-conformity. All such nonconformities are handled by QHSE Team on daily basis

Also not meeting the KPI targets are considered as Non-conformity.

Anything addressed in QHSE is not being followed is considered as Non-conformity

All such Non-conformity are logged in Action Request Report and analyzed further for corrective / preventive action

Corrective action

QHSE team collects all Actions Request Reports and analyzes it for its root causes, Corrective action.

Corrective Actions are the actions taken on the root cause/s of non-conformity, so that this will not reoccur again due to same root cause

Risk based Action

Also based on the analysis, potential risks to business are identified and appropriate preventive actions are raised.

Risk basked actions are the action taken on potential non-conformities, so that it will not occur.

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10.3. Continual Improvement

QHSE TEAM is committed for continual improvement in all areas of **DARREN GULF CO.** This continual improvement can be in technology, processes, Quality, Safety and Environment Management System, Human Resources etc.

QHSE TEAM members always try to find opportunities for improvements. QMS TEAM discusses the areas for improvements in Weekly Progress Meeting.

Reference- Weekly Progress Report

SECTION II – CODE OF CONDUCT

Purpose

The purpose of this code is to provide a clear framework within which employees of the **DARREN GULF CO.** is expected to conduct themselves. **DARREN GULF CO.** strives to maintain a work environment for its employees within and outside the organization by honesty, integrity and respect for fellow employees, customers/clients to constantly reflect in personal behavior and standards of conduct.

1. Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: will this build trust and credibility for **DARREN GULF CO.**, Will it help create a working environment in which **DARREN GULF CO.**, can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

2. Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. **DARREN GULF CO.**, is committed to creating such an environment because

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it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

DARREN GULF CO. is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

3. Create a Culture of Open and Honest Communication

At **DARREN GULF CO.**, everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

DARREN GULF CO., will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

4. Set Tone at the Top

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At **DARREN GULF CO.**, we want the ethics dialogue to become a natural part of daily work.

5. Uphold the Law

DARREN GULF CO.'s commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or **DARREN GULF CO.**, policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

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Because of the nature of our business, some legal requirements warrant specific mention here. [Kuwait Labor Law/ ILO].

6. Competition

DARREN GULF CO., is dedicated to ethical, fair and vigorous competition. **DARREN GULF CO.**, shall sell products and services based on their merit, superior quality, functionality and competitive pricing. **DARREN GULF CO.** shall make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. **DARREN GULF CO.** and its employees shall not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for **DARREN GULF CO.**, or the sales of its products or services, nor engage or assist in unlawful boycotts of particular customers.

7. Selective Disclosure

DARREN GULF CO., will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to **DARREN GULF CO.**, its securities, business operations, plans, financial condition, results of operations or any development plan. **DARREN GULF CO.**, should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

8. Health and Safety

DARREN GULF CO., is dedicated to maintaining a healthy environment. A safety manual has been designed to educate you on safety in the workplace. If you do not have a copy of the QHSEE MS manual and code of practice, please see your QHSEE department.

9. Avoid Conflicts of Interest

Conflicts of Interest

Employees must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, Employees may be faced with situations where the business actions taken on behalf of **DARREN GULF CO.** may conflict with his/her own personal or family interests. Employees owe a duty to **DARREN GULF CO.** to advance its legitimate interests when the opportunity to do so arises. Employees must never use **DARREN GULF CO.** property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with **DARREN GULF CO.**

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Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with **DARREN GULF CO.**
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any transaction.
6. Placing company business with a firm owned or controlled by a employee or his or her family.
7. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all **DARREN GULF CO.** employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

10. Anti-Bribery, Corruption Policy

DARREN GULF CO., is committed to competing solely on a merit of our products and services. Employees should avoid any actions that create a perception that favorable treatment of outside entities by **DARREN GULF CO.** was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities or other benefits from persons or companies with whom, does or may do business. Employees will neither give nor accept business courtesies that

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constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of **DARREN GULF CO.** or customers, or would cause embarrassment or reflect negatively on **DARREN GULF CO.** reputation.

Accepting Business Courtesies

Most business courtesies offered to us in the course of our employment are offered because of our positions at **DARREN GULF CO.** Employees should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at **DARREN GULF CO.**, to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that **DARREN GULF CO.** maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when **DARREN GULF CO.** is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain **DARREN GULF CO.**, business.

Gifts

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom **DARREN GULF CO.** does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value may not be accepted unless approval is obtained from management. Employees with questions about accepting business courtesies should talk to their managers or the HR department.

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Offering Business Courtesies

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon **DARREN GULF CO.** An employee may never use personal funds or resources to do something that cannot be done with **DARREN GULF CO.** resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of **DARREN GULF CO.**

11. Promote Substance over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At **DARREN GULF CO.**, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that **DARREN GULF CO.** is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

Although **DARREN GULF CO.**'s guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

12. Confidential and Proprietary Information

Integral to **DARREN GULF CO.** business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary

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information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. Employees shall not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

13. Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent **DARREN GULF CO.** are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, Employees shall not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. Employees shall not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the **DARREN GULF CO.** network and our fellow employees, **DARREN GULF CO.** reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or **DARREN GULF CO.** intranet. **DARREN GULF CO.** will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

14. Accountability

Each of **DARREN GULF CO.**, Employees are responsible for knowing and adhering to the values and standards set forth in this Code. If **DARREN GULF CO.**, Employees are concerned whether the standards are being met or are aware of violations of the Code, Employees must contact the HR department.

DARREN GULF CO., applies zero tolerance will take disciplinary action, up to and including termination of employment, against employees who violate the law, this code of conduct or company policies.

This material is for informational purposes only and not for the purpose of providing legal advice. You should always contact your attorney to determine if this information, and your interpretation of it, is appropriate to your particular situation.

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SECTION III – QHSE RELATED ADMIN PROCEDURES

1. COMPLAINT REGISTER & DISCIPLINARY POLICY AGAINST VIOLATIONS OF COMPANY POLICIES AND PROCEDURES

DARREN GULF CO., has established Management System programs that all employees are expected to adhere to. We feel that for any policy to be effective, reinforcement is a necessity. Therefore the following disciplinary procedure and complaint register is to be followed whenever an employee violates company established policies, procedures, or any customer, government or agency regulations. **DARREN GULF CO.**, provides a channel to Complaints and concerns through direct approach to the management or Management Committee. Each case will be reviewed by the Management Committee for final disposition at the monthly Manager's Meeting. All employees are accountable for their actions and the Project Manager will be the acting Safety Director. **General Manager, Operation Manager, the Project Manager, QHSE Manager and the HR Manager will form the Management Committee.**

Conflict Resolution

Problems, misunderstandings and frustrations may arise in the workplace. It is **DARREN GULF CO.** intent to be responsive to its employees and their concerns. Therefore, all employees who is confronted with a problem may use the procedure **DARREN GULF CO.**, below to resolve or clarify his or her concerns.

The purpose of this policy is to provide a quick, effective and consistently applied method for a nonsupervisory employee to present his or her concerns to management and have those concerns internally resolved.

- ❖ Initially, employees should bring their concerns or complaints to their immediate supervisor. If the complaint involves the employee's supervisor, the employee should schedule an appointment with that supervisor to discuss the problem that gave rise to the complaint within five working days of the date the incident occurred.
- ❖ The immediate supervisor should respond in writing to the complaint within five days of the meeting held with the complainant employee.
- ❖ If the discussion with the immediate supervisor does not resolve the problem to the mutual satisfaction of the employee and the supervisor, or if the supervisor does not respond to the complaint, the employee may submit a written complaint to the employee's director/department head. Employees may request assistance with writing their complaints from the human resource (HR) department.

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Disciplinary Action Procedure

- ❖ The first time a violation occurs, the employee is verbally reprimanded and conversation is documented and placed in personal file.
- ❖ The second time a violation occurs, the employee is suspended for the remainder of the day without pay, verbally reprimanded, and a written warning is issued. The warning will be signed by both the employee and his supervisor and place into the employee's personal file.
- ❖ The third time a violation occurs; the employee is suspended for the remainder of the day plus three days without pay. Written documentation with signatures of the employee, supervisor, and the Project Manager will be placed in to the employee's personal file.
- ❖ The fourth time a violation occurs; the employee will be suspended for the reminder of the day without pay plus an additional five days w/o pay. Written documentation with signatures of the employee, supervisor, the Project Manager will be placed into the employee's personal file. The employee will be made aware that the next violation will mean automatic termination.
- ❖ The fifth time a violation occurs, the employee is automatically terminated.

When an employee commits a violation, he will be placed on 12 month probation to "cleanse" his record. If he has no other violations during this time period, his record will be wiped clean. This action will apply to only the first and second phases of the disciplinary procedure. The probationary period for the third and fourth violation is 24 months.

The following page contains the "List of Offenses" for which an Employee may be Subject to Discharge or Termination" without prior notice.

NOTICE TO ALL EMPLOYEES

OFFENSES FOR WHICH EMPLOYEES WILL BE SUBJECT TO DISCHARGE WITHOUT PRIOR NOTICE:

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Herein **DARREN GULF CO.** will be referred to as the "Company

1. Fighting or attempting to bodily injure another during working hours or while on Company property.
2. Conduct which violates the common decency or morality of the Kuwait Community.
3. Stealing, or conduct resulting in the injury or destruction of property of the Company or of others, or allowing same to be done by others.
4. Disclosing proprietary or confidential information of the Company without authority of misusing such information outside the scope of employee's assigned job duties.
5. Engaging in unsafe work practice.
6. Failure to report as soon as possible any accident or personal injury in which an employee is involved, to the employee's immediate supervisor.
7. Insubordination, including refusal to perform work assigned or to follow instructions, except refusal to do any acts which would subject the employee to discharge under any of the other offenses listed herein; failure to perform work assigned; use of profane or abusive language toward fellow employees or subordinates or toward those in supervisory positions.
8. Absence from duty without notice to and permission from the immediate supervisor.
9. Being in such condition that the continuance of work would endanger the employee or fellow workers.
10. Falsifying testimony or refusing to cooperate in connection with any Company authorized investigation, or making false statements in connection with applications for employment or in connection with medical examinations and/or drug tests.

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11. Dishonesty in performance of duties as an employee, including but not limited to:
 - (a.) Falsifying records or reports, either written or oral.
 - (b.) Failure to report and account, in accordance with instructions, all money, materials, and equipment.
 - (c.) Fraudulently obtaining money, materials, or property from the Company, its employees, or those with whom it does business.
12. Negligence or carelessness resulting in damage to or loss of Company property or property of others
13. Sleeping during scheduled working hours.
14. Impairment during working hours caused by the consumption of alcoholic beverages, of the use, sale or possession of such beverages on Company property.
15. Impairment during working hours caused by the use of illegal or unauthorized drugs, or the use, sale or possession of such drugs on Company property.
16. Membership in or active support of any organization that advocates illegal conduct by force or any other illegal method.
17. Harassment of fellow employees, subordinates or those in supervisory positions on the basis race, color, religion, sex, national origin, or handicap, including verbal or physical conduct which interferes with an employee's work performance or creates an intimidating, hostile, or offensive work environment.

OTHER OFFENSES

The above list of offenses is not intended to be all inclusive. Some offenses may also be of such nature as to warrant suspension or discharge without prior notice.

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2. SUBSTANCE ABUSE PROCEDURES & ADMINISTRATIVE IMPLEMENTATION

Procedure

DARREN GULF CO., prohibits unlawful and/or unauthorized manufacture, distribution, misappropriation, dispensation, possession or use of controlled substances, illegal drugs and alcohol in the workplace. Reporting to work under the influence of any such agent is also prohibited. Employee involvement with drugs or alcohol outside the workplace may be reviewed to determine if there is an impact on job performance, the workplace. Any **DARREN GULF CO.** employee or applicant exhibiting symptoms or behavior generally associated with substance / alcohol abuse and/or displaying physical indicators may be asked to undergo a health screening. Failure to comply may lead to discharge or denial of employment. Positive test results may lead to condition of continued employment agreement (disciplinary action), discharge or denial of employment.

2.1 Testing and Health Screening

A supervisor who has reason to believe that an employee may be under the influence of a controlled substance based on observations (such as the odor of alcohol, or unusual behavior) must take the following action:

- ❖ Advise the employee in private that he/she will be required to submit to testing and that he/she will be immediately suspended pending an investigation that could lead to discharge until the medically reviewed clinical laboratory results are returned (see Discipline and Follow-up).
- ❖ Fitness for Duty test will require a urine specimen (minimum quantity - 60 ml) and an Immobilizer Test. A positive test will require a blood specimen which will be processed as part of the drug screen. A blood alcohol concentration of 0.02 mg/dl or greater will be defined a positive test result.
- ❖ An employee who is unable to provide a urine specimen (minimum amount) within a two (2) hour time frame will be considered to have refused to submit to a substance abuse test. Discipline for refusal to take the test will be administered accordingly.
- ❖ Document the observations and/or conduct responsible for initiating the drug test/health screening as soon as possible. Every effort must be made to maintain employee confidentiality throughout the entire process.
- ❖ Inform the employee that if the test results are negative, he/she will be reimbursed for lost time.

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3. CONTRACTOR INVOLVEMENT AND CONTRACTOR MANAGEMENT

One of the keys to the company success and strength is to necessitate contractors and sub-contractors to demonstrate the same level of commitment to continuous improvement in standards of care for health, safety and environment

DARREN GULF CO., considers all its contractors/subcontractors as business partners and treat them as our own employee.

3.1 Contractor Assessment

In order to determine whether they can achieve the required health, safety and environmental standards, all contractors who tender for work, or who are otherwise considered to work for **DARREN GULF CO.** are assessed in accordance with an QHSE Management of Contractors Procedure.

The assessment process checks that potential contractors:

- ❖ Have, maintain and comply with their own effective management system covering health, safety and environmental issues.
- ❖ Understand and accept their responsibilities under **DARREN GULF CO.**, QHSE management system.
- ❖ Have health, safety and environmental management arrangements capable of interfacing with **DARREN GULF CO.**, QHSE management system.
- ❖ Comply with appropriate regulatory policies and industry standards.

Contract personnel will participate in QHSE management at all levels, including but not limited to: QHSE meetings, QHSE performance reviews, pre-job planning, training, incident investigations, drills and QHSE audits.

DARREN GULF CO., personnel are continually working with contract personnel and they understand the importance of assuring that contract personnel are directly involved in the QHSE effort.

Activities that involve contractor personnel must be evaluated (Gap Analysis) to determine if the contractor has all the necessary procedures in place to protect the contractor's personnel, as well as **DARREN GULF CO.** personnel.

Successful contractors are required to develop a management interface document which defines the integration of the **DARREN GULF CO.** QHSEMS and the Contractor's management systems for the scope of the sub-contracted work.

3.2 Contractor Monitoring

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In order to confirm that agreed requirements for health, safety and environment are being implemented, contractors' performance of the work scope for safety critical items shall be monitored.

The actual method of contractor QHSE monitoring will vary, depending on the scope, complexity and duration of the contract and will be decided at the contract outset. Methods of monitoring may include audits, inspections, meetings, periodic reports and review of available data (e.g., incident statistics, life threatening incidents and occupational health information, etc).

Monthly contractor number excel sheet (which include man hours worked, vehicle miles driven, injuries and automotive accidents) shall be collected.

3.3 Contractor review and evaluation

At the end of each quarter the contractor performance will be evaluated and negative points and positive points will be reported to the contractor for further improvement.

If the QHSE performance of the contractor is low with repeated negatives the contractor can be run off from **DARREN GULF CO.**

SECTION IV – GENERAL SAFETY INFORMATION

1. GENERAL SAFETY RULES

The following rules are to protect you and your fellow workers. Violation of the rules may lead to disciplinary action up to and including termination.

- ❖ Good housekeeping is required. It is the employee's responsibility to report any unsafe conditions to his supervisor.
- ❖ Horseplay and practical jokes, including initiations, are safety violations. Supervisors allowing these acts as well as the violators are subject to disciplinary action.
- ❖ Safety eyewear, hard hats and safety foot wear are required.
- ❖ The use or possession of illegal drugs, intoxicating beverages or non-approved firearms is forbidden on **DARREN GULF CO.** premises. Violators are subject to disciplinary action including immediate termination.
- ❖ Any defective equipment, machinery, hazardous condition or unsafe work practice must be reported to your supervisor immediately. No further activity shall be conducted until a safe working environment exists.

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- ❖ Climbing up and down ladders requires the use of both hands. Traveling up and down stairs requires the use of handrails.
- ❖ When ending ladders, the employee must always face the ladder.
- ❖ Proper lifting techniques must be used at all times. If you think a load is too heavy, ask your supervisor for help.
- ❖ Accidental discharge or use of firefighting equipment must be reported to the supervisor immediately.
- ❖ No one should ever work or walk under a suspended load.
- ❖ Jewelry, rings and chains shall not be worn while working.
- ❖ Full body safety harnesses with properly secured lanyards must be worn when working at heights above 1.8 Meters
- ❖ Working at the brown field site without H2S gas detection equipment is prohibited.
- ❖ Safety goggles and a full-face shield must be worn when chipping, grinding or when performing any job where flying particles pose a potential for eye injury.
- ❖ When handling or mixing chemicals, chemical gloves, goggles, apron and respirator must be used. In addition, when mixing caustic, a full-face shield and goggles are required.
- ❖ Hearing protection must be worn when entering high noise areas.
- ❖ Attendance at monthly safety meetings and participation in emergency drills, pre-tour and pre-job safety meetings is mandatory.
- ❖ No smoking is allowed in dining halls, recreation rooms or sleeping quarters. Smoking is only allowed in designated areas.
- ❖ All incidents must be reported to supervisory personnel including injuries and near misses.

2. QHSE PERFORMANCE PROGRAM

2.1 Purpose

The purpose of this QHSE performance goals process is to provide personnel a means to become directly involved in **DARREN GULF CO.** Health, Safety and Environmental Protection Program. Personnel are given a method by which they will be able to document how well they are performing with regard to QHSE.

The following information explains the criteria of this process. The criteria can and will change. Reasons for changes will include: input from personnel, extra emphasis on a specific area where problems exist, achieving the directive for a category, such as training, etc.

Many of the items listed below are currently being done by personnel; however, this process will allow personnel to receive recognition for their involvement. This

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method of tracking performance goals is a self-assessment process. Personnel record their own progress.

2.2 Scope

This program involves all **DARREN GULF CO.** operations personnel.

There are several main categories that are known to have an impact on safety when performed regularly. The explanation of each category is as follows:

- ❖ Incident reporting
- ❖ Safe work practices
- ❖ Performance in the safety meetings
- ❖ Meeting the training requirements

3. SAFETY MEETINGS

Working schedules will have an effect on goals set for safety meetings. Safety meetings include: Monthly safety meetings, Pre-tour and Pre-job safety meeting

3.1 Monthly Safety Meetings

Each crew will have a minimum of one crew safety meeting per month. All personnel must be involved in the monthly safety meetings.

3.2 Pre-Tour Safety Meetings

Crews will hold a pre-tour safety meeting at the beginning of each tour, with the purpose of assuring that all personnel are familiar with the current operation underway as well as the hazards and precautions associated with that operation. The supervisor or the site engineer should be involved in explaining conditions.

3.3 Pre-Job Safety Meetings

Pre-job safety meetings will be held before performing a job that deviates from the normal routine or performing a hazardous job. Pre-job meetings are necessary so that everyone understands the hazards associated with the job or equipment and to ensure that the appropriate precautions have been taken to protect personnel.

4. AUDITS

4.1 Worksite Condition Audits

Worksite condition audits consist of surveying the location using the Monthly Safety checklist forms. Also included are fire extinguisher checks, Electrical testing equipment inspections, wire rope inspections, gas monitor inspections, safety harness inspections, equipment integrity inspections, personal protective equipment inspections, conditions of the tools and forklift/crane inspections.

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5. SAFETY SIGNS

Personnel must be aware of equipment, areas or operations where they need to take special precautions or where they are required to wear special protective equipment. The following information specifies the location of the signs that are to be used.

<u>Placement of Sign</u>	<u>Sign</u>
Work site location	< Assembly point < Speed limit warning sign < High voltage sign boards < No smoking signs < Display pictograms of proper PPE at required locations < Eye wash stations < Battery charging area – warning < Gas bottle storage area < Emergency response plan < Fire extinguisher < Exit signs < No smoking areas

6. TRAINING PROGRAM

6.1 Scope of Training Program

- ❖ For all newly hired employees.
- ❖ When new procedures or new equipment is introduced.
- ❖ To maintain awareness of hazards.
- ❖ When it is perceived that QHSE performance in general is slipping.

6.2. Responsibility for Training

Safety training is the responsibility of the supervisor. A supervisor has an obligation to show his employees the safest method of doing a job. Once that is done, the employee shares in that responsibility to perform his work safely.

6.3. General Information

Specific training for all personnel is required. See the attached training matrix for details of training requirements by position.

6.4 Methods of Training

- ❖ Site Induction Training

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- ❖ Monthly Safety Training Meetings
- ❖ Pre-Job Safety Meetings
- ❖ Pre-Job Safety Meetings
- ❖ On-the-job Safety Training (during the course of work, a supervisor has the responsibility to correct any improper work habits that his individual personnel may have).
- ❖ Orientation Training
- ❖ Other scheduled trainings

6.4.1. MONTHLY Crew Safety Meeting

a) Purpose

This is to emphasize and convey the importance of safety during our operation by communicating and interacting with the employees.

b) Scope

This involves all **DARREN GULF CO.** personnel, as well as contract personnel that may be involved in a special operation.

c) Objectives

- ❖ To inform personnel of safe operating procedures, hazards, chemicals to be used.
- ❖ Remind employees about how important safety is to them.
- ❖ Train new employees.
- ❖ Re-train experienced personnel
- ❖ Discuss safety problems
- ❖ Exchange of ideas

d) Steps to Effectively Organizing a Monthly Safety Meeting:

Choose a topic that relates to your personnel or the operation to be done. Topics can be from:

- ❖ QHSE Topics manuals
- ❖ Incident Investigation Reports
- ❖ Near-miss reports
- ❖ Job Safety Analysis
- ❖ Crew members ideas
- ❖ Special operations coming up (Commissioning and testing.)

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- ❖ Monthly or Quarterly QHSE Reports
- ❖ Special Hazard Bulletins
- ❖ Monthly QHSE posters

Write the topic and main points down on the crew safety meeting report form.

Know the material! Don't try to "wing" your way through a meeting. The meeting will not be organized, important points may be forgotten and your commitment to safety may be interpreted as not being very good!

Keep the meeting less than 10 minutes, unless crewmembers are taking part by talking about the topic. Keep the meeting on the intended topic until you've said all you planned to say.

Ask for comments about the meeting topic. Allow crew members to have input into the meetings.

Ask about any problems that the crewmembers might have spotted around the work location. You must follow-up on any suggestions to show that you, as a supervisor, care about eliminating problems. Close the meeting by stating the main points again. These meetings should be held monthly and to the minimum the site engineer should be present.

6.4.2 Pre-Tour Safety Meetings

Pre-tour meetings are used as a method to get personnel focused on working safely from the moment they start their tour.

Pre-tour safety meetings are short and to the point. Any operations that may have carried over from the previous tour must be discussed.

The activities to be done at the time the tour begins should be the main point discussed, along with any hazards that are associated with the upcoming operations.

6.4.3 Pre-Job Safety Meetings (Non-Routine Tasks)

These meetings are usually informal, anyone may conduct a pre-job and these meetings are very specific to the job that personnel are about to perform.

Pre-job meetings bring all personnel involved back to focus on exactly what is going to be done, point out the hazards involved and what precautions need to be taken before beginning the job.

The importance of holding a safety meeting before non-routine tasks is as follows:

- ❖ Reminds personnel that an unsafe act or condition will get them hurt.

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- ❖ Will give personnel a chance to learn as safety procedures are talked about.
- ❖ Shows personnel the safety equipment that is needed to do the job.

A job safety analysis can also be used to show the steps involved in doing a specific job as well as the hazard associated with that job and how to avoid those hazards.

On-the-job training may involve stopping an operation for a short time in order to explain a potential problem.

Many people learn things quicker if they are shown how an operation is supposed to be performed, particularly if the hazards are also shown.

6.4.4 Safety Training

Training topics shall be one which is mentioned in the training matrix which could include: work permit, lockout/tag out, hazard communication, confined space entry, general safety procedures using JSA's, H₂S, emergency, device training, fall prevention/protection, forklift/crane, first aid, new employee orientation, fire prevention, risk assessment, personal protective equipment, emergency drills, electrical safety, ladders and scaffolds and many others.

Safety training is our first line of defense against incidents. Personnel are given information pertaining to a specific operation. Training increases awareness of the job and of the hazards associated with the job.

Training will be scheduled and conducted depending up on various factors like recent near misses, client requirement, operational demand etc. Training shall be of in-house training, which will be conducted by the safety engineer, safety supervisor or site engineer or shall be conducted by a certified third party agency.

7. ORGANIZATION

DARREN GULF CO., safety program is one where Safety is planned and carried out along with their daily activities. Persons failing to meet their safety responsibilities are counseled and where consistent failure is noted, termination of employment is rendered.

A. Field Organization Charts

The principal staff members in charge of application of QHSE program for the project are:

- ❖ MD
- ❖ General Manager
- ❖ Operations Manager
- ❖ **Safety Engineer**

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- ❖ Field Engineer
- ❖ Supervisor
- ❖ Technician
- ❖ Heavy lift operators
- ❖ Safety Officer
- ❖ Foreman
- ❖ Welders
- ❖ Electrician/Mechanic
- ❖ Operator
- ❖ Skilled workers

8. HAND TOOL SAFETY

8.1 Purpose

To ensure that all personnel are aware of the proper use of hand tools.

8.2 Scope

Includes All **DARREN GULF CO.** operations.

8.3 Introduction

Hand and Power tools enable employees to apply additional force or energy to accomplish a task. These tools improve efficiency and make better products. Because of the increased force of hand and power tools, the objective of safety with tools is to protect the users from inflicting harm to themselves or others, as well as to provide ergonomically designed tools. The proper use and care of tools should be given a prominent place in a safety program. Through proper selection, use, care, and supervision of hand and power tools, injuries can be prevented.

Each year hand tools are the source of 6% of all compensable disabling injuries. Disabilities resulting from misuse or using damaged tools includes loss of eyes and vision, puncture wounds from flying chips, severed fingers, tendons, and arteries, broken bones and teeth, contusions, infections from puncture wounds, and many others.

Consider all aspects of the work situation when selecting hand and power tools. The tools selected should (1) perform the job and (2) be usable by the employee that is the tool should not cause the employee any physical pain or discomfort. Allowing employees to select tools is also helpful.

8.3.1 Key points to consider when selecting tools:

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The handles' shape and form and material used to make it can minimize stress to the employees' hands and upper body. An ergonomically well-designed tool will reduce the incidence of fatigue and injury and may improve production as well.

- ❖ Quality of the tool, including sharpness of the cutting edges, affects the amount of force needed to do a job. Jobs using the same tool can vary greatly in the amount of force employees must apply.
- ❖ Power tools designed to have minimal vibration will be more comfortable to use and less likely to result in HAVS (Hand Arm Vibration Syndrome).
- ❖ If possible use some foot controls to avoid repetitive hand and arm movements.
- ❖ Use the right tool for the job. Hammers are not to be used as pry bars, nor wrenches as hammers.
- ❖ The user shall return tools to their proper storage place.
- ❖ Tools with wood handles shall be inspected for soundness and securely wedged.
- ❖ Tape shall not be used to cover defects or attempt to make the tool serviceable.
- ❖ Pipe wrenches shall not be used for bending or lifting purpose.
- ❖ When using a hammer wrench, attach a piece of rope to the handle to apply tension to hold it in place.
- ❖ Defective tools, wrong tools for job, incorrect methods and bad tool conditions are the main causes of hand tool injury.
- ❖ Inspect each tool before use.
 - Keep sharp tool in sheaths when not in use.
 - Clean tool when you are finished with them.
 - Return tool to their proper storage place.
 - Don't use defective or incorrect tools.
- ❖ Before putting an employee and tools together, consider the work station and work methods. Work methods should achieve maximum production and cause a minimum of stress to employees.

9. LADDERS AND SCAFFOLDING

9.1. Purpose

To ensure the safety of personnel while working around ladders and scaffolding.

9.2 Scope

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Includes all **DARREN GULF CO.** operations.

9.3 Ladder Inspections and Scaffolding Use

9.3.1 Fixed Ladders

- ❖ All fixed ladders and stairs shall be inspected before each use to determine if they are in a safe and operable condition. Ladders or stairs found defective shall be repaired or replaced before further use.
- ❖ Ladders shall be painted or treated, as applicable; to prevent any deterioration that could be caused by the environment they are in.
- ❖ All fixed ladders that are 10 feet in height as measured from the ground must have a cage or a fall protection device permanently installed. On ladders with climbing devices, the climbing device should be visually inspected then tested by pulling back on it from its base. The person conducting this test should be certain that the device is tight and secure prior to each use of the device.

9.3.2 Cages

Cages will be constructed as follows:

- ❖ Cages will extend a minimum of 42 inches above the top of landing.
- ❖ Cages shall extend down the ladder to a point not less than 7 feet nor more than 8 feet above the base of the ladder.
- ❖ Cages shall not extend less than 27 inches nor more than 28 inches from the centerline of the rungs of the ladder.
- ❖ Cage shall not be less than 27 inches in width.
- ❖ Vertical bar spacing will be a minimum of 8-1/2 inches and maximum of 9-1/2 inches center to center.

9.3.3 Portable Ladders

- ❖ All portable ladders must be inspected prior to each use. Ladders with any defects must be removed from service and replaced.
- ❖ All portable ladders must be removed and properly stored after each use. Leaving ladders leaning against equipment is not acceptable.
- ❖ Ladders constructed with fiberglass side rails are recommended over aluminum ladders due to conductivity.

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- ❖ Metal ladders must have a decal or stencil warning that the unit should not be used near electrical equipment.

9.3.4 Safety Precautions

The following safety precautions shall be used in connection with the use of ladders:

- ❖ Portable ladders shall, wherever possible, be used at such an angle that the horizontal distance from the top support to the foot of the ladder is one-quarter of the working length of the ladder, 4 feet up one foot out rule.
- ❖ Load ratings of ladders shall not be exceeded.
- ❖ Portable ladders must be placed so the load is evenly distributed on the ladder feet.
- ❖ Portable ladders must not be placed in front of doors that will open toward the ladder unless the door is blocked, locked or guarded.
- ❖ Ladders shall not be placed on barrels or any other unstable bases to obtain additional height.
- ❖ Ladders shall not be used in a horizontal position as platforms, runways, or scaffolds.

Short ladders shall not be spliced together to provide long sections.

9.3.5 Maintenance

All ladders must be maintained with special attention given to the following:

- ❖ Joints between steps and side rails are tight.
- ❖ Hardware and fittings must be securely attached.
- ❖ Moveable parts must be free and operable.
- ❖ Frayed or worn rope must be replaced.
- ❖ Safety feet must be operable.
- ❖ Rungs and steps must be kept clean and free of defects.
- ❖ Should be kept painted (except wooden ladders) or treated to prevent rust or weathering.

9.3.6 Scaffolding

- ❖ All scaffolding shall be inspected prior to being erected to ensure that all parts are available and operable.
- ❖ The footing/anchor point for scaffolds shall be sound, rigid and capable of carrying the maximum intended load.
- ❖ Handrails and toe boards shall be installed on all open sides and ends when the work performed is 10 feet or more above ground or floor level. Handrails

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must be between 36-42 inches in height and enclose the full walkway. Handrails must be made of tubular steel and they must have a mid-rail. Toe boards must be at least 4 inches in height and must extend all the way around scaffolding.

- ❖ Scaffolding shall only be erected, altered or dismantled by trained, qualified persons. Anyone who believes a scaffold has become unsafe shall inform the relevant supervisor immediately.
- ❖ No scaffolding shall be used unless inspected and approved by responsible supervisor.
- ❖ Working platform height of a mobile scaffold shall not exceed 4 times the size of smallest base dimension.
- ❖ Ladders must conform to appropriate ANSI standards and be inspected for defects before every use. Metal ladders shall not be used for electrical works.
- ❖ Face the ladder when climbing.
- ❖ Don't use ladder in horizontal position as a walkway.
- ❖ Never carry equipment or tools when using ladder.

10. PROPER LIFTING TECHNIQUES

10.1 Purpose

This program is designed to reduce exposure of personnel to lifting injuries, and familiarize personnel with proper lifting procedures.

10.2 Scope

This program covers all **DARREN GULF CO.** personnel whose jobs require the lifting of materials.

10.3 General Information

Personnel's exposure to back injuries can be reduced through training. The fact is that four out of five people will experience back pain in their lifetime. Everyone needs to understand how to avoid exposure to activities that can cause back pain.

10.4 Causes of Back Injuries

Many different situations can cause back injuries. Listed below are several examples:

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- ❖ Improper lifting techniques
- ❖ Poor posture
- ❖ Over exertion
- ❖ Medical factors (age, other disabilities)
- ❖ Slips and falls
- ❖ Excessive body weight
- ❖ Lack of exercise
- ❖ Stress

10.5 Symptoms of Back Injuries

Symptoms of back injuries will vary depending on the type of back injury and the person.

- ❖ Pain and tightness in the back
- ❖ Spasms
- ❖ Decreased range of motion
- ❖ Numbness in the legs
- ❖ Limited ability to sit or stand. Most back pain is due to simple muscle strain, not permanent damage to vertebrae. Back pain can be treated with heat and ice like most other muscle strains. However, if the pain persists, see a physician immediately.

10.6 Steps to Proper Lifting

- ❖ Plan the job – determine the route to travel that's free from tripping or slipping hazards.
- ❖ Examine the object to be lifted – determine its weight, look for sharp edges. The load's weight should be equally distributed. If it's not, get help.
- ❖ Get a good grip on object – use palms and fingers to make carrying easier. Protect hands and feet while lifting.
- ❖ Wear safety shoes – reinforced toes and non-slip soles may prevent injuries due to dropped objects or slippery surfaces.
- ❖ Get help! Ask for help if you have any doubt about moving the object by yourself or use a mechanical aid such as a hand truck, dolly, forklift, air hoist, cranes, etc.
- ❖ Lift with your legs – assume a comfortable stance, lift smoothly, keeping the load close to the body. Avoid twisting your body as you lift.
- ❖ Set the load down properly -- lower the load slowly by bending your knees with your back straight. Again, use your leg muscles instead of your back.

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10.7 Body Position While Lifting

- ❖ Stand as close to the load as possible with feet spread apart.
- ❖ Bend at the knees, keeping your back straight and stomach tucked in.
- ❖ Lift smoothly with your legs.
- ❖ Hold the load close to the center of your body.

11. EXCAVATIONS AND TRENCHING

When trenching, the following procedure will be followed:

- ❖ Before any trenching work is to be started, a properly executed excavation permit will be obtained.
- ❖ The excavation permit will have the required tools listed to be used for the job including the Ditch Witch and/or any hand tools to be used.
- ❖ Before the work is started, all underground electrical cables and/or flow lines will be identified and marked.
- ❖ If trenching at or near a transformer, the equipment shall be isolated from all source of energy and lock-out/tag-out procedures will be performed to ensure that there are no hidden live wires to be encountered. Also, try to identify and avoid the route of any cable coming from any disconnect in the area and ensure that this disconnect is isolated, locked-out and tagged.
- ❖ When it is deemed safe to begin the actual trenching there will be an observer/helper on location observing the trenching process. With the observer in position a safe distance from the trenching tool, slowly lower the trenching tool and begin trenching. The observer will look for any sign of identified cables; tiles encountered and immediately stop the trenching process by informing the operator of the danger.
- ❖ If an undisclosed cable is encountered, immediately remove the trenching tool, stop the trenching, move all equipment and tools a safe distance from the danger and inform the supervisor. If it is deemed unsafe to remove any tools, do not do so, move a safe distance away and inform the supervisor of the encounter.
- ❖ If at any time it is deemed unsafe to begin or continue the trenching process, do not do so. Inform the supervisor of the hazard and do not continue or begin until the hazard is removed.
- ❖ Once the ditch is completed and cable is laid, place the electric cable tiles in the ditch and backfill. Mark the cable location with cable tiles on top of the surface above the trench until other means of marking the cable location are made available.

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Should a connected wire or line be found on or near the ground, it is NOT to be touched by anyone but by a qualified person unless it is definitely known it is NOT "hot." In the case where power lines are down, every wire, including fences and guy wires, should be considered "hot" and should be handled by a qualified person. Broken wires, poles, guy wires and any other equipment requiring repair should be reported to the supervisor when discovered.

When a crew is working on a unit or other piece of energized equipment, it must be locked out before work can begin. It is prohibited for any employee to enter the guarded area while the unit is running. The unit must be locked out before beginning work or entering into the guarded area. If the unit is to be left locked out overnight, or while no employees are on location, or for an extended period of time (one or more days) a tag will be placed on the isolated item with the supervisors name, date, and telephone.

12. MACHINE GUARDING

12.1 General Procedures

- ❖ All guards shall be of the size and shape to protect the operator and other employees from hazards such as those created by point of operation, in-running nip points, rotating parts, flying chips, sparks, etc.
- ❖ The guard must completely cover the hazard, whether it be rotating parts, or in running nip points, etc. NOTE: Machine guards must have openings that are small enough to prevent employees from being able to reach the point of operation, such as: fingers through a fan blade guard.
- ❖ The supervisors are responsible for ensuring that guards are adequate and in place. The Safety Engineer shall be consulted if questions arise as to what is adequate guarding.
- ❖ All guards will be securely attached to the machine wherever possible and secured elsewhere if not feasible to be directly attached to the machine.
- ❖ Lockout/Tag out procedures will be followed before guards are removed from machinery
- ❖ Guards will be replaced before the machinery is placed back into operation, as directed in **DARREN GULF CO.** Lockout/ Tag out Program.

13. ROTATING MACHINERY

Rotating machinery consists primarily of compressors, engines, turbines, and pumps. Rotating machinery is dangerous because of the high speeds and pressures used in its operation. Repairs shall not be initiated until the fuel supply is shut off

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and the starting circuits disconnected, locked out, and tagged. The following safety precautions shall be observed when working around rotating machinery.

A) Compressors

- ❖ Before starting repairs, the suction and discharge valves shall be closed and the pressure bled off.
- ❖ Compressor alarms and shutdowns shall be tested periodically.

B) Machines

Prior to initiating repairs or maintenance, pressurized lines shall be bled off.

- ❖ When turbines are shut down for maintenance or service, air or gas supply to the auxiliary lube oil pump shall be shut off to prevent accidental operation (where applicable)
- ❖ Engines shall be located in well ventilated areas and as far away as practical from headers, separators, oil storage tanks.
- ❖ Air starters shall be used instead of gas starters where practical; however, if gas starters are used, exhaust piping shall be securely anchored and vented to a safe location. Means shall be provided to vent unused gas or liquid accumulation trapped between the starter and the starter valve after it is closed. Before activating the gas starter, the integrity of the vent line shall be checked.
- ❖ Portable internal combustion engines with engine mounted fuel tanks shall be shut down and allowed to cool before refueling. Exceptions shall be approved by local supervision.
- ❖ When cranking engines using a rope starter, employees shall not wrap the rope around their hands or wrist while starting
- ❖ Rope shall be equipped with a pull handle.

C) Pumps

- ❖ Prior to initiating repairs or maintenance, the pump shall be shutdown, isolated, and the internal pressure bled down.
- ❖ Main electrical disconnects and valves shall be locked out and tagged prior to initiating work.
- ❖ A pressure relief valve shall be part of the discharge manifold on every power-driven pump with the exception of centrifugal pumps. It shall be placed ahead of the first valve on the discharge line. Relief valve outlets shall be vented to a safe location or discharged back into the pump suction. When discharge extensions (vents) are necessary, they shall be securely anchored.

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14. ELECTRICAL SAFETY

14.1 INTRODUCTION

- ❖ Unlike mechanical hazards, electrical hazards are not usually obvious. For example a live conductor does not differ in appearance from a dead conductor.
- ❖ This chapter provides general information and precautions for people working on or near electrically operated equipment.
- ❖ For further information please refer to the safety rules for "Control, Operation & Maintenance of Electrical Power System Equipment" manual which is in the custody of Electrical Maintenance Division.

14.2 ELECTRICAL HAZARDS

14.2.1 ELECTRICAL SHOCK

- ❖ Electrocution or electrical shock may kill or cause serious injuries to a person within seconds with currents as low as 30 mA at 50 Volts and 50 or 60 Hz.

14.2.2 HEATING AND SOURCE OF IGNITION

- ❖ Overheated electrical conductors may cause burn injury and ignite flammable materials.
- ❖ Switching or sparking of electrical equipment in flammable atmospheres may cause fires and explosions. Even a small spark from a battery-operated appliance may have sufficient energy as a source of ignition.
- ❖ Electrical arcing and flashover may cause burn injuries. Operating starters, contractors, etc in exposed condition may result in Arcing and Flashover.

14.3 CAUSES OF ELECTRICAL HAZARDS

Following are some of the causes of electrical hazards.

- Faulty or damaged wiring or equipment
- Loose connections
- Use of under-rated wiring or poor quality fittings
- Lack of earthing / grounding / bonding
- Lack of protective safety devices.

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- Use of overrated fuses or jumpers.
- Working on live equipment.
- Overloading of power sockets, equipment.
- Water seepage or handling with wet body parts.
- Poor housekeeping.
- Handling of electrical equipment by incompetent person, lack of awareness and training
- Lack of safe working procedures and poor communication
- Failure to use appropriate PPE & tools.
- Lack of warning signs.
- Lack of proper identification.

14.4 GENERAL PRECAUTIONS:

- ❖ Any person not a member of Electrical Maintenance Division shall not attempt repair of electrical apparatus, rectify faults, or perform any switching operation not normally the function of the user, i.e., Circuit breaker energized/de-energized.
- ❖ Any abnormality shall be reported to the Electrical Maintenance staff immediately.
- ❖ All electrical apparatus brought into the company premises with the exception of that forming an integral part of a vehicle, shall have the approval of the Electrical Superintendent (This include all battery operated items).
- ❖ Placing or hanging cloth or other material on electrical equipment shall be forbidden.
- ❖ Electrical switches or the access to them shall not be blocked by any material.
- ❖ Handling of electrical apparatus or switchgear shall not be done while the hand or body is wet.
- ❖ Wiring and equipment shall conform to the relevant standards and the area classification
- ❖ Written procedures shall be available for working on or near electrical equipment.
- ❖ Use of non-intrinsically safe pagers/mobile phones and similar devices shall not be permitted inside hazardous areas.