



## OCCUPATIONAL HEALTH AND HYGIENE STANDARD

### APPENDIX 3

## Roles and Responsibilities for Occupational Health and Hygiene

### Purpose

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To identify general and specific roles and responsibilities of Assets and Central functions in relation to implementation, monitoring and review of requirements of the Occupational Health and Hygiene Standard.

### Target Audience

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- *Managers and Supervisors.*
- *Employees.*
- *Contract Holders and Contractors* where the Contract Scope includes activities potentially hazardous to health.
- *HSE Professionals.*

### Scope of Applications

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This document applies to all *Sakhalin Energy LLC Assets, Facilities, Operations, Projects and Activities*, including activities undertaken by any *Contractor* on behalf of the *Company*.

### Roles and Responsibilities

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**The Head of Corporate Health Section** shall ensure that this Occupational Health and Hygiene Standard is introduced and maintained.

### General Requirements

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**Managers are Accountable for requirements 1 to 3 in their organisations.**

1. Manage occupational health and hygiene in compliance with requirements of:
  - 1.1. RF laws, or the law of the territory in which work is conducted if outside RF;
  - 1.2. Lenders and Shareholders as defined in International Requirements for Occupational Health and Hygiene.Overview provided in RF and International Legal Requirements for Occupational Health and Hygiene<sup>1</sup>
2. Implement responsibilities defined in Roles and Responsibilities for Occupational Health and Hygiene.
3. Monitor, report and review in accordance with:
  - 3.1. Production control programme;
  - 3.2. Incident Reporting and Follow-up Standard;
  - 3.3. HSE Monitoring and Reporting Standard;
  - 3.4. Occupational Health and Industrial Hygiene Assurance Specification.

**Contract Holders are Responsible for requirement 4, and Contract Engineers are Responsible for requirement 4.2.:**

4. Require Contractors to comply with this Standard.

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Italicised terms in this document are included in the Sakhalin Energy LLC HSE Glossary.



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- 4.1. For existing Contracts, this might be limited to compliance with clauses within the existing Contract.
- 4.2. For new Contracts, require compliance with the requirements of this standard with particular reference to the Contractor Health Management Specification.

### **The employees are *Responsible* for requirements 5 to 7:**

5. Comply with Company health requirements, instructions and procedures.
6. Cooperate with Company measures, including reporting of health incidents and unwell conditions.
7. Participate in occupational health and hygiene training and activities.

### **Requirements. Medical Evaluations for Fitness to Work**

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#### **Managers are *Accountable* and Supervisors are *Responsible* for requirements 8 to 10.**

8. Refer employees for Medical Examination, as defined in the Medical Evaluations for Fitness to Work Specification.
  - 8.1. Verify that employees have completed Medical Examination and have a valid certificate for fitness to work.
9. Assign work only to those employees who are fit for the work.
  - 9.1. Identify any employee who may not be fit for work and refer the employee for Medical Examination when there is a concern about the individual's Fitness to Work.
10. In liaison with Human Resources, manage employees who have been determined unfit for the work as defined in the Medical Evaluations for Fitness to Work Specification.
  - 10.1. Review any work restrictions provided by the medical professional.
  - 10.2. As far as possible, approve required accommodations and changes in work assignment.

#### **Employees are *Responsible* for requirement 11.**

11. Advise their Supervisor, Health Care Service Provider or Head of Corporate Health Section of any change in their physical or mental capacity to work.

### **Requirements. Contractor Health Management**

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#### **Contract Holders are *Responsible* for requirements 12 to 14.**

12. Refer Contractors to the appropriate clauses in Contractor Health Management Specification to ensure compliance with Company requirements for:
  - 12.1. Fitness to work;
  - 12.2. Medical emergency response;
  - 12.3. Occupational health and hygiene;
  - 12.4. Accommodation and catering;
  - 12.5. Management for alcohol and drugs;
13. Assess Contractor against the requirements listed above.
14. Monitor, follow up and report progress regarding standard implementation to the business.

#### **Contractor is *Responsible* for requirements 14 to 16.**

15. Assess implementation of Company requirements and progressively close out weaknesses identified.
16. Report progress implementation of the Company requirements listed above.



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### Requirements. Management of Alcohol and Drugs at Work

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#### The HR Director is *Accountable* for requirement 17:

17. Establish and implement a process to manage Risk caused by the use of alcohol and drugs as defined in the Management of Alcohol and Drugs at Work Specification, including:
  - 17.1. awareness training,
  - 17.2. alcohol and drugs testing,
  - 17.3. provision for referral to treatment/rehabilitation and reintegration into the workplace, and
  - 17.4. process for consequence management.

#### The Head of Corporate Health Section is *Responsible* for requirement 18.

18. Provide and maintain content for alcohol and drugs awareness training (as part of Health awareness).

#### The Head of Corporate Security Department is *Responsible* for requirement 19.

19. Implement alcohol and drugs testing on worksites as defined in Management of Alcohol and Drugs at Work Specification.

#### Managers are *Responsible* for requirements 20 to 22.

20. Support the implementation of alcohol and drug testing on worksites.
21. When indicated, in liaison with the Human Resources Directorate and the Head of Corporate Health Section, support referral of an employee to treatment and rehabilitation, and reintegration into the workplace.
22. When indicated, in liaison with the Human Resources Directorate, implement the Disciplinary Action Procedure.

#### Employees are *Responsible* for requirements 23 to 25.

23. Comply with the Life-Saving Rules in relation to alcohol and drugs.
24. Inform Health Care Service Providers and/ or Company Health Manager in case drugs are prescribed by medical professional for treatment or prophylaxis.
25. Seek for medical support and follow prescribed treatment in case of alcohol or drug related problems. The employee may address the Line Manager and/or the Head of Corporate Health Section.

### Requirements. Medical Emergency Response (MER)

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#### Managers are *Accountable* for requirements 26 to 30.

26. Ensure that employees have access to medical services that take account of the risks associated with the type and location of their work in accordance with the MER Specification.
  - 26.1. Tier response times and MER requirements are as follows:
    - emergency First Response at scene,
    - First Aid treatment by Designated First Aiders within four minutes after an incident;
    - assessment and stabilisation by a Medical Professional within one hour,
    - admission to and care at the nearest Local Hospital within four hours;
    - referral to an appropriate Specialist Hospital (timing depends on the nature of the injury/illness and the condition of the injured).
27. Identify Site characteristics, perform Risk Assessment, evaluate required MER resources, and prepare Worksite MER Manuals in accordance with the MER Specification.
  - 27.1. Manage Sites where Tier response times cannot reasonably be achieved.
28. Establish and maintain MER preparedness as defined in the Worksite MER Manuals.



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29. Perform MER exercises and monitor MER performance.
  - 29.1. Include MER exercises in the Worksite's programme of *Emergency Response* drills and exercises.
  - 29.2. Review MER arrangements for *Remote Worksites* annually.
30. Respond to external requests for MER assistance in accordance with the *MER Specification*.

### **Employees are Responsible for requirements 31 to 32:**

31. Initiate *First Response* and *Call Out* in accordance with Worksite procedure.
32. Provide First Aid if willing to and if trained as a Designated First Aider.

### **The Head of Corporate Health Section is Responsible for requirement 33.**

33. Support establishment of MER.
  - 33.1. Conduct Site Medical Reviews.
  - 33.2. Approve Health Care Service Providers for MER and Worksite clinics.
  - 33.3. Manage Company interface with Health Care Service Providers, including local hospitals, *Specialist Hospitals*, and *Assistance Companies*.
  - 33.4. Review Worksite MER Manuals.
  - 33.5. Participate in review of MER exercises and investigation of incidents to identify lessons learned.
  - 33.6. Approve medevac or referral to Specialist Hospital in accordance with the Company Tier 3-4 Medevac procedure.

## **Requirements. Occupational Hygiene, Health Hazard Management**

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### **Managers are Accountable for requirements 34 to 37.**

34. Reduce exposure to Health Risks in the workplace *As Low As Reasonably Practicable* using the following Hierarchy of Controls:
  - Eliminate the health Hazard.
  - Substitute the health hazard with a less harmful type or form.
  - Use engineering controls.
  - Use operational/procedural controls.
  - Use personal protective equipment.
35. Implement Health Risk Assessment (HRA) in accordance with industry Health Risk Assessment Methodology (defined by *OGP*) and the RF laws (special assessment of working conditions) with support from the Company's Health Manager.
  - 35.1. Review the HRA recommendations with the Company-approved Industrial Hygiene service provider.
  - 35.2. Approve and implement the HRA Remedial Action Plan.
  - 35.3. Review HRA in case of *Change* to operations, work places or working practices.
36. Implement requirements of the Health Hazard Management Specification.
  - 36.1. Manage occupational exposure to within regulatory or Company limits, whichever is more stringent.
  - 36.2. Implement and maintain HRA specified Control and Recovery Measures, e.g., for the following categories of Risks:
    - Chemical, including *Acute Toxic Substances*, *Asbestos* and *Refractory Ceramic Fibre*.
    - Biological, including infectious diseases, food and drinking water.
    - Physical, including vibration, noise, illumination, Ionizing Radiation, and work in extreme climate & adverse weather.



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- Ergonomic and Psychological, including *Human Factors Engineering*, manual handling, visual display unit work, organisational factors and stress.
- 36.3. Manage chemicals at worksites in accordance with the Corporate Chemicals Management Standard.
- 36.4. Communicate Health Risks and Controls to impacted employees.
- 36.5. Provide appropriate *PPE* as defined in Personal Protective Equipment Specification.
- 37. Apply Permit to Work for:
  - 37.1. Activities that may involve exposure to Acute Toxic Substances,
  - 37.2. Work on and removal of Asbestos and Refractory Ceramic Fibres.

### The Head of Corporate Health Section is **Accountable** for requirement 36.

- 38. Coordinate the following activities:
  - 38.1. Conduct HRA, recommend Controls, and recommend Remedial Action Plans.
  - 38.2. Develop and implement the Occupational Health and Hygiene Industrial Control monitoring programme (in support of requirement 3).

### Requirements. Health and Welfare

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#### Managers are **Responsible** for requirements 39 to 40.

- 39. Implement and enforce requirements relating to designated smoking areas as defined in the corporate life saving rules and legal requirements, to manage Risks of ignition (safety) and exposure to tobacco smoke (health).
- 40. Implement Company wellness programmes, in support of management of non-occupational Health Risks focusing on employee awareness, promotion of a healthy lifestyle, and creation of a supportive environment.

#### The Head of the Corporate Health Section is **Accountable** for requirements 41 to 45.

- 41. Ensure provision for smoking cessation support via Health Care Service Providers.
- 42. Maintain mechanism for provision of HIV-AIDS treatment.
- 43. Provide advice to employees in relation to Infectious disease control.
  - 43.1. Maintain Company Pandemic preparedness.
- 44. Recommend and support Company wellness programmes, considering non-occupational Health Risks and improvement measures, and monitor implementation.
- 45. Provide employees notification and awareness materials in support of Company health programmes.

**Detailed roles and responsibilities** are summarised in Table 1.

- R Responsible** party to do it or get it done: the executing party. The Responsible party shall perform the necessary work and take the actions required to ensure compliance with legal requirements.
- A Accountable** party, approves, must 'sign off' acceptance of results. The Accountable party approves the work done by the Responsible party and is Accountable for the results.
- S Support** party. Provides active support and input to the Responsible party and the Accountable party.
- C Consulted** party. Shall be Consulted by the Responsible party on activities and results. The Consulted party must be given an opportunity to contribute.



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**Table 1.**

Activities (short text only; for full text refer to the Occupational Health and Hygiene Standard and Specifications)	Asset / Functional Manager	Supervisor	Head of Corporate Health Section	Company Senior Hygienist	Company Industrial Safety Manager	HR Director	Contact Holder	Contractor	Production Chemistry Manager	Compliance Department
Overall accountability for all aspects of Occupational Health and Hygiene Management	A							A		
<b>GENERAL</b>										
Legal updates – identify, communicate, update standards			R	S	S	C	S		R	C
Legal requirements – comply		R	S	S	S	S		R		C
Corporate OH&H Standard – develop, maintain	C		R	S		C				C
Corporate OH&H Standard – implement, comply		R	R	R			R	R	R	
<b>OCCUPATIONAL HYGIENE</b>										
Implement and maintain Health Risk Assessment				R				R		
Review and agree HRA Remedial Action Plan	R			S						
Implement Workplace Attestation and obtain Workplace Certification	A			S	R	A		R		
Implement Sanitary Monitoring Programme	A	S		S						R
<b>CONTRACTOR HEALTH MANAGEMENT</b>										
Specify health requirements in contract			S				A			
<b>MEDICAL EVALUATIONS FOR FITNESS TO WORK</b>										
Refer employees for Medical Examination, verify valid certification and fitness		R	S		S			R		S
Manage employees determined unfit for the work		R	S			A		R		
<b>INVESTIGATION OF OCCUPATIONAL ILLNESSES</b>										
Investigate occupational illnesses and implement remedial actions	A	S	S	S	S	A		R		S
<b>MANAGEMENT OF ALCOHOL AND DRUGS AT WORK</b>										
Establish Alcohol and Drugs policy and procedures			R			A		R		
Implement Alcohol and Drugs policy and procedures	A		S					R		
<b>MEDICAL EMERGENCY RESPONSE</b>										
Maintain Worksite MER Manuals	A		S				R	R		
Establish and maintain MER preparedness	A		S					A		
<b>HEALTH AND WELFARE</b>										
Implement Company wellness programmes	A		S				A			
<b>HUMAN FACTORS ENGINEERING</b>										
Implement HFE screening for each new project and demonstrate ALARP	A		S				A			