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Sakhalin Energy Investment Company Ltd. Safety Consequence Management Standard

Стандарт по Управлению Последствиями Нарушения Требований Охраны Труда

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Revision Details

Rev	Location of Change	Brief Description of Change	
01		First Issue for Use	
02	Full Revision	Full Revision of the Document Structure and Content. Number of Life Saving Rules changed from 10 to 8.	
03	Revision of 4.2.1. Disciplinary actions, 5 Requirements	Full Revision of the Document Structure and Content due to Life Saving Rules update	
04	Full revision	Adopted LSRs reviewed considering (1) changing risk profile with major projects OPF Compression and Train 3, (2) actual Sakhalin-2 incidents including fatalities and high potential incidents to date, (3) revised IOGP LSR guidance, and (4) Shareholder rules including recently issues Gazprom Key Safety Rules. Additional 3 rules adopted, and 2 rules combined (number of LSRs changed from 8 to 10). Full revision of document text based on the above advice and local experience.	



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1. INTRODUCTION

1.1 Purpose

It is essential that all persons working on Sakhalin-2 comply with applicable Health, Safety, Environment, Security, and Social Performance (HSSE&SP) rules.

To promote compliance, Sakhalin Energy Investment Company (hereafter Sakhalin Energy, or the Company) rewards behaviours which lead to good performance and imposes disciplinary actions for violations of specific identified rules deemed essential by the Company and /or Labour Code of the Russian Federation.

The applicable labour safety, industrial safety and road safety requirements are stipulated in RF legislation and regulations, Company's HSES&SP Policies and Standards, and in site-specific instructions. In accordance with Russian Federation Labour legislation:

- It is the duty of all employees to observe labour safety requirements established by laws and other regulations, as well as by labour safety rules and instructions.
- Sakhalin Energy requires that employees comply with internal labour protection and safety rules and instructions.
- A failure to follow applicable labour safety requirements is considered to be a breach of labour discipline.
- Sakhalin Energy applies disciplinary sanctions against employees for disciplinary offences.

For the majority of violations to requirements, disciplinary sanctions will be decided by line management on a case-by-case basis in compliance with the current RF Labour legislation and Sakhalin Energy Internal Working Rules.

This document defines a number of specific violations for which disciplinary sanctions are mandated throughout the Company and contractors.

The purpose of this Standard is to define Life Saving Rules (LSRs) and related safety consequence management arrangements:

- 1. To save lives.
- 2. To modify worker and supervisor behaviour by raising awareness of activities which are most likely to result in fatalities, and highlighting simple actions individuals can take to protect themselves and others.

1.2 Scope

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

This document applies to all categories of persons working on the Sakhalin-2, including Sakhalin Energy direct hires, personnel nominated by Shareholders for work at the Company, agency personnel and contractors.

These rules apply to both workers and supervisors/managers. The term "**Personnel**" is defined as Company direct hire personnel, personnel nominated by Shareholder for work at the Company, Contractors and agency personnel.

Contractors are required to apply the requirements of this Standard within their own systems and in compliance with RF Labour legislation.

1.3 User Notes

A controlled copy of the current version is available in UNICA via the Sakhalin Energy website. Before using this document, it is the User's responsibility to ensure that the hard or electronic copy hereof is current. The Document Custodian should be contacted for assistance and any feedback.



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2. RISKS AND CONTROLS

The consequence management policy aims to control the following Risks^{1:}

- Non-compliance with key provisions of the Sakhalin Energy HSES&SP Policies and Standards.
- Non-compliance with RF legislation and regulations concerning labour safety, industrial safety and road safety.

Life Saving Rules have been developed based on analysis of reported fatal and high potential incidents in Sakhalin-2 and international oil and gas industry. LSRs were identified which if applied would have prevented a significant portion of those fatal incidents. LSRs are communicated using simple icons and text. Broad adoption of LSRs is intended to provide consistency for contractors working in the industry.

The control of HSE relies on compliance with Russian Federation Labour legislation and with the Sakhalin Energy HSE-SP Management System and associated control documents. HSE incidents, near misses and non-compliances occur when violations of these control documents take place.

¹ Italicized terms in this document are included in the <u>Sakhalin Energy HSE Glossary</u>.



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3. REQUIREMENTS – GENERAL ROLES & RESPONSIBILITIES

Managers and Supervisors and Contract Holder are accountable for requirements 3.1 – 3.3 in their own organization:

- 3.1 This Standard shall be communicated, implemented and enforced for Company staff including direct-hire, contract-hire and shareholder secondees.
- 3.2 If any of the violations stated in section 4 or 5 of the present Standard come to the attention of the line manager, the appropriate HR Business Partner shall be contacted and the disciplinary actions to be invoked according to RF labour legislation requirements and Company Internal Working Rules. In case of contractor staff, the relevant contract holder shall be contacted.
- 3.3 Fair and properly documented investigation shall be conducted in case of the standard violation in compliance with the legal requirements and Company's <u>Incident Reporting and Follow-up Standard.</u>

Contract Holders are accountable for requirements 3.4 - 3.6:

- 3.4 This Standard or an equivalent procedure shall be implemented for contractors and sub-contractors working for Sakhalin Energy.
- 3.5 If any of the violations stated in section 4 or 5 of the Standard come to the attention of the contract holder, the contractor shall be notified of the appropriate consequence management in writing with a copy to the contract file.
- 3.6 In case of violations stated in section 4 or 5 of the Standard by contract-hire personnel, the meeting between Contract responsible Sakhalin Energy director and contractor management shall be arranged to discuss consequences management and improvements.

Company direct hire personnel, is accountable for requirements 3.7 - 3.8, and contractors and agency personnel (hereafter Personnel) are responsible for requirement 3.7.:

- 3.7 Company direct hire personnel, personnel nominated by Shareholders for work at the Company, Contractors and agency personnel shall stay in compliance with the law, with the labour safety rules specified in the Sakhalin Energy local normative acts, Sakhalin Energy HSE Standards and procedures, Internal Working Rules and Labour Safety Instructions.
- 3.8 Company direct hire personnel, personnel nominated by Shareholders for work at the Company are obliged to report all incidents occurring in activities executed for Sakhalin Energy within 24 hours.



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4. REQUIREMENTS - POLICY

Managers, Supervisors and Contract Holders are Accountable for requirement 4.1 and 4.2 in their own organization:

4.1. Recognition of good HSE performance

Through various initiatives, the following good HSE performance should be recognized:

- Any out of the ordinary intervention by an individual.
- Outstanding periods of high safety performance by teams.
- Initiatives that have led to a demonstrable increase in safety awareness and/or performance.
- Individuals or groups who have a track record of exemplary personal leadership in safety through their actions and behaviours.
- Any other safety achievement that warrants recognition.

4.2. Disciplinary Actions

- 4.2.1. The following violations shall always incur disciplinary action:
 - Appearing at work under the influence of drugs or alcohol.
 - Smoking outside designated smoking areas, and/or carrying or use of unauthorized ignition sources in hazardous areas.
 - · Failure to wear a seatbelt.
 - · Exceeding the speed limit
 - · Using communication devices whilst driving.
 - Failure to follow prescribed journey management plan.
 - Driving without a valid defensive driving certificate.
 - Entering a confined space without authorization.
 - Walking under a suspended load
 - · Failure to protect yourself against a fall when working at height
 - Working without a valid work permit when required.
 - Failure to verify isolation before work begins.
 - Reckless violations of legal requirements or other HSES&SP requirements specified in Company standards and procedures, including but not limited to:
 - Bringing unauthorized weapons onto company premises.
 - Keeping, selling or distributing illegal drugs.
 - Overriding or disabling safety critical equipment without authorization.
 - Failure to obtain authorization before starting excavation activities.
 - Failure to conduct gas tests when required.

The implementation details are specified in Section 5 of this Standard.

- 4.2.2. The disciplinary action shall consist of admonition, reprimand or dismissal, and be performed according to RF Labour Code. For appearing at work under the influence of drugs or alcohol or for violations that lead, or could lead to disastrous consequences, a single violation shall lead to dismissal.
- 4.2.3. For all Company direct hire personnel, personnel nominated by Shareholders to work at the Company an admonition or reprimand for violations listed in this Standard shall also affect the individual's overall performance appraisal. For admonition the individuals IPF shall be capped at 0.8 and for a reprimand the individual's IPF shall be capped at 0.0. It is expected that contractors applied similar graduated disciplinary measures for violations by their staff.
- 4.2.4. If the violation is due to Manager's or Supervisor's dereliction of duty, i.e. provision of a vehicle not fitted with seatbelts, giving orders in conflict with Company standards or procedures, disciplinary actions will apply to the Supervisor or Manager and not to the Employee or contractor.



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5. REQUIREMENTS – IMPLEMENTATION

5.1 Do not appear at work under the influence of alcohol or drugs

Using alcohol or illegal drugs, or misusing legal drugs or other substances, will reduce your ability to do your job safely.

Personnel are responsible for requirements 5.1.1 – 5.1.3

- 5.1.1 Appearing at business premises or acting on company business shall be prohibited:
 - with Blood Alcohol Content (BAC) level determined to be equivalent to or greater than 0,48 Pro Mille or 0,16 mg per litre of exhaled breath;
 - in a state of drug intoxication resulting from use of illegal drugs or misuse of legal drugs.
- 5.1.2 Personnel shall cooperate in case of a request for an alcohol or drug check by line manager, Contractor Holder, security or medical staff.
- 5.1.3 You should always inform the supervisor or the person in charge if you are taking medicine that may have an effect on your performance. If in doubt always check with your supervisor or the person in charge who may seek medical advice.

Managers and Supervisors are responsible, and Contract Holders are accountable, for requirements 5.1.4 – 5.1.5 in their own organization.

- 5.1.4 Screening, testing and searches for alcohol and drugs shall be conducted in accordance with the Management of Alcohol & Drugs at Work Specification and Substance Intoxication Evaluation Guideline.
- 5.1.5 Evidence of this violation shall be established by the opinion of a medical professional, a physiological test/analysis, or a biochemical test/analysis, including alcohol and drug tests. Other adequate evidence to detect or confirm violations, such as testimonies or reports of witnesses, can only be used as advised and approved by Sakhalin Energy Legal Directorate.

5.2 Do not smoke outside designated smoking areas. Do not carry or use unauthorized ignition sources in hazardous areas

Smoking, use of matches or cigarette lighters, or carrying/using other ignition sources, could set on fire flammable materials. Designated smoking areas or a smoking room, will keep you safe from causing fire and explosion.

Personnel are responsible for requirements 5.2.1 - 5.2.4

- 5.2.1 Smoking in an hazardous area, including the use of matches, lighters or any other means to ignite smoking materials, shall be prohibited.
- 5.2.2 Carrying or using personal electronic devices or other unauthorized ignition sources in hazardous areas shall be prohibited unless otherwise permitted according to Portable E-device guide.
- 5.2.3 The professional use of electronic devices, excluding explosion proof or intrinsically safe devices, shall be performed under a Category 2 Hot Work Permit to Work and gas test shall be done as specified in the permit.
- 5.2.4 Every type of explosion-proof or intrinsically safe electrical device shall be inspected and approved by site authorized electrician prior to its use without a Permit to Work.

Site controllers are accountable for requirements 5.2.5 –5.2.8 in their own organization

- 5.2.5 Hazardous areas existing in all facilities used for the production, transport and processing of hydrocarbons shall be clearly defined and communicated to every person visiting the asset. Any designated smoking areas shall be clearly marked.
- 5.2.6 Any items considered as ignition source shall be recorded in the duty log and secured by site security or person in charge until the individual leaves the site.
- 5.2.7 Electrical equipment (machines, units or devices), instrumentation, electrical lights, shut-off devices, telephones, radio stations and their alarms, installed in the hazardous areas shall be explosion-proof and have explosion safety level as required by standard of IEC 60079/GOST 31610. The type of explosion protection shall correspond to the class and group of explosive mixture in the area.
- 5.2.8 Every type of explosion-proof electrical equipment manufactured abroad shall have the test certificate, issued by the licensed Russian test laboratory, validating compliance of this equipment



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with the Russian regulations for the hazardous zone application. RTN permit shall be required to authorize the use of such equipment.

5.3 Wear your seatbelt

A seatbelt protects you from injury in the event of an incident while driving and keeps you safe. Wearing seatbelts includes safety belts in (rental) cars, taxis, (mini-)buses, trucks, cranes, or forklift trucks, and involves persons in moving vehicles when engaged on company business. You should check that everyone in the vehicle is wearing a seat belt properly before starting to drive, and intervene if your fellow passengers are not wearing seatbelts properly.

Personnel are responsible for requirements 5.3.1 – 5.3.2.

- 5.3.1 All employees shall wear seatbelts when travelling in a Company vehicle, and shall keep the seatbelt properly fastened while the vehicle is moving, as per Road Transport HSE Management Standard and other Company provided transport.
- 5.3.2 Any modification or disabling of a seatbelt are prohibited and may lead to dismissal.

Managers and supervisors are responsible for requirement 5.3.3

5.3.3 All vehicles operated on behalf of the Company shall be equipped with the proper type of seatbelts as per Road Transport HSE Management Standard.

5.4 While driving, do not use communication devices and do not exceed the speed limit

Speeding or using communication devices while driving increases the risk of losing control of your vehicle. For example, drivers must not use a mobile, send or read a text message, or use a hands-free mobile phone device. If you are a passenger you should intervene if a driver is using a phone in a moving vehicle, and intervene if a driver is exceeding the maximum allowable speed.

Drivers, both Company and Contractors, are responsible for requirement 5.4.1

5.4.1 Drivers shall follow the requirements to mobile communication devices and to comply with speed limits set by Road Transport HSE Management Standard

5.5 Follow prescribed journey management plan and have valid defensive driving certificate.

A journey management plan is a plan for you as a driver that will help you to travel and arrive safely. Defensive Driver Training improves your road skills and your ability to prepare for third party road user behaviours.

Drivers, both Company and Contractors, are responsible for requirements 5.5.1 – 5.5.3.

- 5.5.1 Persons driving a Company or Contractor supplied vehicle shall have valid Defensive Driving Training course certificate for this type of vehicle, as per <u>Drivers, Driving and Defensive Driving Training (Appendix 4 of Road Transport HSE Management Standard).</u>
- 5.5.2 Journey shall be executed only with the required Journey Authorisation as per <u>Safe Journey Management (Appendix 5 of Road Transport HSE Management Standard).</u>
- 5.5.3 Deviating from the approved route description in the Journey Plan shall be prohibited unless necessitated by an emergency.

Managers and supervisors are responsible for requirement 5.5.4.

5.5.4 Necessary arrangements shall be made for the drivers to be able to timely pass required Defensive Driving Training and obtain proper journey authorisation prior to the travel.

5.6 Obtain authorization before entering a confined space

A confined space, such as a vessel, tank or pipe can contain explosive gas, poisonous air or other dangers such as a lack of oxygen, things that can fall on you or you can fall from. Authorised access keeps you safe.

Personnel are responsible for requirements 5.6.1-5.6.2.



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- 5.6.1 Confirm with the Supervisor or the Person in Charge of the work that atmosphere in the confined space is tested and it is safe to start work.
- 5.6.2 Confirm with the attendant that you can enter a confined space. Follow the requirements of the Work Control Certificate.

Managers and supervisors are responsible for requirements 5.6.3-5.6.5.

- 5.6.3 Ensure any activities in the confined space are not commenced without the preliminary gas testing performed by certified Gas Testers.
- 5.6.4 Confirm that a qualified attendant is always present when people are in a confined space.
- 5.6.5 Confirm that rescue plan is in place and communicated to all personnel involved prior to start of work.

5.7 Protect yourself against a fall when working at height

Use fall protection equipment when working outside a protective environment where you can fall over 1.8 meters to keep you safe. A protective environment includes approved scaffolds, stairs with handrails, and man lifts.

Personnel are responsible for requirements 5.7.1-5.7.3.

- 5.7.1 Obtain authorization to work at height above 1.8 m, outside of a protective environment as per Pan Asset Procedure Working at Height and Over Water..
- 5.7.2 Use fall protection equipment when working above 1.8 m, outside of a protective environment, as per Pan Asset Procedure - Working at Height and Over Water.
- 5.7.3 Always tie off when at height, outside of a protective environment.

Managers and supervisors are responsible for requirements 5.7.4-5.7.5.

- 5.7.4 Requirements for work at height specified in the <u>Pan Asset Procedure Working at Height and Over Water</u> shall be properly communicated to all personnel involved in these type of activities and necessary training shall be provided.
- 5.7.5 Safety equipment which is used for work at height activities shall be available onsite, timely inspected, certified and in good condition.

5.8 Do not walk under a suspended load

Working or walking immediately under a suspended load is unsafe as the load can fall on you. A suspended load is an object that is temporary lifted and hangs above the ground.

Personnel are responsible for requirements 5.8.1 – 5.8.4.

- 5.8.1 Never cross a barrier controlling an area with a suspended load without authorisation from the person in charge of the lift.
- 5.8.2 Do not walk or conduct any activity under a load that is temporarily lifted.
- 5.8.3 When participating in lifting operations everyone shall ensure that they:
 - · are in a safe position in case the load falls or swings;
 - understand the signalling methods and agreed communication methods;
 - follow the instructions of the flagman or the person in charge of the lift;
 - are not under the load (an exclusion from this rule applies if such under load positioning is specifically authorized in the approved lift plan).
- 5.8.4 Due to the nature of Drilling Operations for rig floors prohibited areas are defined by Shell Dropped Object Prevention Manual (WS.38.80.00.115-Gen.) with clear No-Go and Red Zone requirements. A violation occurs only when an unauthorized person enters a prohibited area.

Managers and supervisors are responsible for requirements 5.8.5–5.8.6.

- 5.8.5 Prior to each lift the flagman or person in charge of the lift shall make sure the lift area is controlled by barriers in accordance with Pan Asset Barrier Philosophy and everyone will be clear if the load swings or falls.
- 5.8.6 If the only option is to conduct the lift over process areas or over buildings occupied by persons, the Corporate Procedure for lifting operations over live process areas shall be applied.



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5.9 Work with a valid work permit when required

A work permit describes what you must do to stay safe.

Disciplinary action in relation to this LSR shall apply if violation may result in RAM Severity 4-5 incident. Final decision shall be determined by HSE Technical Authority 1.

Managers and supervisors are responsible for requirements 5.9.1 - 5.9.5.

- 5.9.1 Hazardous or non-routine work shall be **conducted** in accordance with <u>Permit to Work Manual</u> (ISSOW) and Permit to Work Procedure.
- 5.9.2 Permit to Work process shall be **communicated** to the workforce emphasizing that all specified activities shall be planned and conducted as per requirements defined in 5.9.1.
- 5.9.3 The correct level of **risk assessment** shall be applied to identify required controls including but not limited to isolations, gas tests and equipment. The level 2 risk assessment shall be conducted by the people required for identification of appropriate controls.
- 5.9.4 All controls specified in Work Control Certificates shall be explained to work party by means of a prejob toolbox talk. The workplace shall be inspected before the work starts.
- 5.9.5 Changes shall trigger appropriate revision of the work method statement, risk assessment, Work Control Certificates and permitting documentation.

Personnel are responsible for requirements 5.9.6 – 5.9.7.

- 5.9.6 All non-routine or hazardous construction, modification, inspection, maintenance, repair, testing, or dismantling work shall be covered by a documented Permit to Work as per Permit to Work Procedure.
- 5.9.7 Requirements stated in ISSOW Work Control Certificates for the job shall be followed by work party at all times. If following the requirements is not possible, the work shall be suspended until the matter is resolved.

5.10 Verify isolation before work begins

Guidance: Isolation separates you from danger, such as electricity, pressure, toxic materials, poisonous gas, chemicals, hot liquids or radiation, to keep you safe. Isolations include, for example, lock switches, separation of pipes with spades, or lock access doors.

Personnel are responsible for requirements 5.10.01 – 5.10.02.

- 5.10.01 Understand the isolations that protect you from danger.
- 5.10.02 Confirm with the responsible Isolation Authority that isolations are in place.

Managers and supervisors are responsible for requirements 5.10.03 - 5.101.5.

- 5.10.03 The Isolating Authority shall be authorised as being competent to apply isolations.
- 5.10.04 Isolations shall be applied in strict adherence with the <u>Isolation and Reinstatement of Plant and Equipment Procedure</u> and maintain all risks at ALARP level for all tasks where isolations are required.
- 5.10.05 Prior to authorizing work to commence, confirm that no stored energy or other dangers remain and confirm that it is safe to start work.

5.11 Reckless violations of other HSE Requirements

Personnel are responsible for requirements 5.11.1 – 5.11.6.

- 5.11.1 It is prohibited to bring unauthorized weapons on Company premises.
- 5.11.2 It is prohibited to keep, sell or distribute illegal drugs.
- 5.11.3 Obtain authorisation before overriding or disabling safety critical equipment. Safety critical equipment shall not be overridden without obtaining the required authorisation. Examples of safety critical equipment include but not limited to, trip systems, fire and gas alarm systems, certain level Controls, alarms, crane computers, and In Vehicle Monitoring Systems (IVMS).
- 5.11.4 Obtain authorization before starting excavation activities.
- 5.11.5 Conduct gas tests when required.



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5.11.6 All Company HSE Standards and procedures shall be adhered to, and interventions shall be made in case of any doubts.

6. REPORTING

Personnel are responsible for requirement 6.1.

Reporting of Violations shall be done by all staff as described by <u>Incident Reporting and Follow-Up Standard</u> or in <u>Whistle Blowing/Grievance procedure</u>.

Some violations may also be reported through compliance monitoring of the Road Safety Monitoring Teams as per: Road Safety Monitoring Team (RSAM) Procedure.

Violations may also come to light as a result of incident investigations, audits, reviews or inspection of Company records.

Managers, supervisors and Contract Holders are responsible for requirement 6.2.

- 6.2 Evidence of violations shall be recorded as per the incident investigation or whistle-blowing procedures referred to in article 6.1.
- 6.3 In case there is disagreement, the final classification of an incident as LSR violation shall be made by the HSE Technical Authority 1.



7. REFERENCES

	1
SEIC Internal Working Rules	<u>0000-S-90-01-O-0026-00-E</u>
Management of Alcohol & Drugs at Work Specification	0000-S-90-04-O-0270-00
Pan Asset Barrier Philosophy	1000-S-90-04-P-0151-00
Corporate Procedure for lifting operations over live process areas	0000-S-90-04-P-7073-00
Permit to Work Manual (ISSOW)	1000-S-90-04-P-0031-00
Permit to Work Procedure	0000-S-90-04-O-0261-00
Road Transport HSE Management Standard	0000-S-90-04-O-0005-00
Pan Asset Procedure - Working at Height and Over Water	1000-S-90-04-P-0127-00
Incident Reporting and Follow-Up Standard	0000-S-90-04-O-0020-00
Whistle Blowing/Grievance procedure	0000-S-90-01-P-0097-00
Road Safety Monitoring Team (RSAM) Procedure.	1000-S-90-01-P-0572-00
GOST 31610	
IEC 60079	
Shell Dropped Object Prevention Manual (WS.38.80.00.15-Gen.)	WS.38.80.00.15-Gen.
Substance Intoxication Evaluation Guideline	1000-S-90-04-M-0018-00