

### **Contents**

1.	Purpose	1
2.	Definitions	1
	Scope	
	Work method	
	Requirements for High Risk Contractors	
	5.1 General:	
	5.2 Additional requirements for all High Risk Contractors:	3
	5.3 Additional requirements for High Risk Contractors performing High Risk Tasks:	
	Annexes	

### 1. Purpose

This Safety Guide (SG) provides instructions for high-risk contractors and subcontractors executing work at KPNWE construction sites.

These instructions shall cover such matters as safety, health, environment and security.

#### 2. Definitions

KPNWE	Kuwait Petroleum North West Europe			
HSSE	Health, Safety, Security and Environment			
Contractor	Contractor or subcontractor executing work for KPNWE.			
High Risk Contractor	Contractor who provides High Risk Services			
High Risk Services	As High Risk Services are classified:			
	1. Fuel transport			
	2. High Risk Tasks			
Fuel transport	Transport of bulk fuels over land, rail and water			
High Risk Tasks	<ol> <li>Work executed with elevating platforms (tower waggons,)</li> <li>Work at height</li> <li>Hot work (work that requires using tools that produce flames or sparks)</li> <li>Work on electrical installations</li> <li>Excavation works (soil drilling, excavation of underground tanks,)</li> <li>Working in hazardous atmospheres that requires explosion or oxygen measurements or measuring the presence of toxic substances</li> <li>Work that requires the use of lifting or hoisting devices (cranes,)</li> <li>Work/entry in <i>confined spaces</i></li> <li>Use and maintenance of rubber/synthetic flexible hose assemblies</li> <li>Handling of hydrocarbon samples</li> </ol>			



Confined spaces	Guidelines:
	Examples: work in storage tanks, sewers, large/deep trenches and excavations/building pits, work in pipelines, unventilated or poorly ventilated spaces.
	Confined spaces are spaces that:
	<ol> <li>are not designed for continuous occupancy;</li> <li>are difficult to enter and/or exit in emergencies;</li> <li>may present additional risks such as explosive atmospheres, presence of dangerous products,</li> </ol>
	Note: some places may become confined spaces when work is carried out or during their construction, fabrication or subsequent modification.
Work at height	Work at height = work with a <i>height of fall</i> > 2,5 meters or less if local law is more stringent (e.g. in Belgium > 2 meters); Height of fall = height between floor/ground and feet of the person working at height
Flexible Hose Assembly	Assembly of a rubber / plastic hose with appropriate fittings for the transfer of fuels, compressed air or steam
High risk work equipment	Equipment with an increased risk to persons, property and environment when it is used, such as lifting equipment, pressure vessels, electrical installations, pneumatic and electrical hand tools
Handling of hydrocarbon samples	Amongst others this means taking samples, transporting samples, sample storage and sample waste

### 3. Scope

This Safety Guide (SG) applies to High Risk Contractors executing work for KPNWE or its subsidiaries.

#### 4. Work method

The Safety Guide and related Annexes form an inseparable and integral part of the contract between KPNWE and the contractor concerned.

The contractor may not incur additional costs as a result of taking additional HSSE measures necessary for the proper execution of the work.

In the event of disagreement on the necessity of taking HSSE measures, the HSSE Manager of KPNWE shall make the final decision.



### 5. <u>Requirements for High Risk Contractors</u>

### 5.1 General:

*High Risk Contractors* shall meet the requirements set out in the SG. These requirements are in addition to or in support of:

- the relevant local and international legal regulations for the work or services to be performed;
- KPNWE's HSSE policy statement;
- other contractual obligations agreed between the parties;
- safety plans or documents prepared specifically for certain types of work;
- the requirements of standards for which the *High Risk Contractor* is certified such as ISO 14001, SCC, OHSAS 18001, MASE, SQAS, ISRS;
- standards that can be applied as good engineering practices.

In the case of conflict, the most stringent requirements shall be applied. This means that where any relevant legal or other requirements are more stringent than the requirements of KPNWE, the legal or other requirements shall prevail, but if the KPNWE requirements are more stringent than the legal or other requirements, then the KPNWE requirements shall prevail.

### 5.2 Additional requirements for all High Risk Contractors:

- The *High Risk Contractor* is responsible for complying with the applicable requirements.
- The High Risk Contractor is explicitly responsible for the subcontractors he employs.
- The *High Risk Contractor* must impose the relevant requirements on parties for which he is responsible (such as employees, employed subcontractors, visitors, etc.) and must ensure a clear communication of relevant requirements to those parties.
- Employees of the *High Risk Contractor* must have the necessary basic knowledge of safety and environment, and receive any additional training required for the performance of their duties. The *High Risk Contractor* must be able to provide evidence that the personnel for whom he is responsible is actively involved in the implementation of KPNWE's HSSE policy statement.
- The *High Risk Contractor* must have a certified occupational safety/environmental management system. Examples of possible systems are:
  - VCA : Veiligheid, gezondheid en milieu Checklist Aannemers
    - LSC : Liste de contrôle Sécurité, santé et environnement entreprises Contractants
    - SCC : Sicherheits Certifikat Contraktoren
    - SCC : Safety Checklist for Contractors
  - VCU : Veiligheid en gezondheid Checklist Uitzendorganisaties
    - LSI : Liste de contrôle Sécurité pour les entreprises de travail Intérimaire
    - SCP : Sicherheits Certifikat für Personaldienstleister
  - GEHSE: Guide d'Engagement Hygiène, Sécurité, Environnement
  - OHSAS: Occupational Health and Safety Assessment Series
  - MASE : Manuel d'Amélioration Sécurité des Entreprises
  - SQAS : Safety & Quality Assessments Systems (fuel transport)
  - Other : if approved by the HSSE Manager KPNWE

An EMS (e.g. ISO 14001) is recommended.

- The *High Risk Contractor* must have all the permits, certificates and licences required for the agreed services and/or work he is performing.
- When requested by the HSSE department of KPNWE and where applicable, the High Risk Contractor shall be required to submit the following documents:



- permits, certificates and licences (e.g. environmental permits, ADR certificates, CE certificates, test and inspection certificates, waste certificates, ...);
- o audit or inspection reports;
- documents and reports verifying that the *High Risk Contractor* has complied with the HSSE obligations and requirements set out in the contract.
- At the request of the HSSE department of KPNWE, a kick-off meeting may be held with the *High Risk Contractor* prior to the commencement of the work. The following items shall be discussed during this meeting:
  - Risk analysis of the work to be performed;
  - The LMRA method to be used;
  - Personnel training;
  - Mandatory reporting (including incident reports);
  - The contractor's HSSE certificates;
  - The necessary permits for the work to be performed;
  - The work permits to be used;
  - The follow-up and maintenance of high risk work equipment
  - The relevant emergency plan;
  - Work agreements between the parties.
- If the work of the *High Risk Contractor* is to coincide with or linked to works carried out by third parties, he must consult those third parties and make arrangements so that the safety and quality performance of all work is guaranteed.
- During the execution of the work the *High Risk Contractor* shall inform the staff carrying out the work of the latest developments in the areas of the environment and occupational safety at a toolbox meeting held at least once a month.
- The *High Risk Contractor* shall report to KPNWE any incident that occurs within the scope of the work under the contract within 24 hours of such incident occurring in accordance with the procedure in place (see **Annex 13**).
- The *High Risk Contractor* shall present to KPNWE the HSSE performance data required by the same within five working days from the end of each quarter/trimester (see **Annex 14**).
- The *High Risk Contractor* will carry out the work ensuring that *high risk work equipment*, used by staff carrying out the work, meet all legal requirements for purchase, storage, use, maintenance and inspection.

If the high-risk contractor uses *flexible hose assemblies* during the execution of the work, they must meet the requirements KPNWE (see **Annex 15**).

- The High Risk Contractor shall apply the rules for interventions on HSE Critical Barriers (see Annex 1, chapter E) (\* HSE CRITICAL BARRIERS: are technical barriers that are designed to prevent or mitigate emissions of dangerous products. These barriers are essential to safely manage critical processes (= process safety) like storage and transfer of dangerous products or interventions on installations containing these products. Examples of HSE Critical Barriers are: tank & piping shells, overfill prevention/protection, alarms/indicators of hydrocarbon detectors, leak detection, vapour recovery systems, hydrocarbon resistant pavements, bunds, KWS etc.
- The *High Risk Contractor* shall regularly verify whether his employees and subcontractors abide by the requirements set by KPNWE.
- The *High Risk Contractor* may be subject to audits and checks by KPNWE staff or authorised third parties at all times, before and during the works. The checks and audits may cover both the applied management system and the execution of the works on site.
  - Any binding recommendations which may be formulated for an audit or check must be implemented as agreed upon in an Action Plan to be approved by both the *High Risk Contractor* and KPNWE.



### 5.3 Additional requirements for High Risk Contractors performing High Risk Tasks:

- Prior to the commencement of the works, the High Risk Contractor concerned shall:
  - have present a (task) risk analysis (analyses) of the tasks that he and/or its subcontractors will be performing;
  - conduct Last Minute Risk Analyses (LMRA);
  - have the necessary work permit/s.

The analyses, LMRAs and work permits may be requested by KPNWE at any given time.

 The High Risk Contractor concerned performing High Risk Tasks shall, in carrying out specific High Risk Tasks, comply with the requirements set out in the Task Safety Requirements (see section 6, Annexes).

### 6. Annexes

- Annex 1 Task Safety Requirements General Requirements
- Annex 2 Task Safety Requirements Working at Height General
- Annex 3 Task Safety Requirements Working at Height Ladder
- Annex 4 Task Safety Requirements Working at Height Mobile Elevated Work Platforms
- Annex 5 Task Safety Requirements Working at Height Scaffolding
- Annex 6 Task Safety Requirements Working at Height Roof Work
- Annex 7 Task Safety Requirements Confined Spaces
- Annex 8 Task Safety Requirements Excavation
- Annex 9 Task Safety Requirements Hoisting and Lifting
- Annex 10 Task Safety Requirements Measurements
- Annex 11 Task Safety Requirements Hot Work
- Annex 12 Task Safety Requirements Electrical Installations
- Annex 13 Contractor Incident Report Form Template
- Annex 14 HSSE Contractor Information Exchange
- Annex 15 Task Safety Requirements Flexible Hose Assemblies
- Annex 16 Task Safety Requirements Sampling



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