



HSSE LEVEL I HIGH LEVEL EXHIBIT

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I GENERAL PROVISIONS

All defined terms in this Exhibit shall have the same meaning as set out in the Contract unless otherwise stated.

Any breach of the HSSE Exhibit shall be deemed by the Company to be a material breach of the terms of the Contract between the parties and the Company shall be entitled to take appropriate action including instructing the Contractor to (a) remedy the breach; (b) suspend Work or (c) terminate the Contract.

Contractor shall develop and document a health, safety, security, and environment Plan (HSSE Plan) addressing the HSSE risks specific to the Scope of Work set out in the Contract and the management of controls to eliminate, reduce or mitigate these risks.

I.1 THE HSSE PLAN

The HSSE Plan shall address the HSSE risks of all phases of the Work through mobilization, execution, and demobilization at each location where the Work will be performed (including but not limited to the office, factory, fabrication yard, construction site, vessel, offshore installations) known as the Site, and shall demonstrate how risks to all personnel have been identified and have been reduced to as low as reasonably practicable, (ALARP).

The HSSE Plan shall contain the list of HSSE deliverables along with a schedule for their completion.

The HSSE Plan shall be submitted to for review and acceptance within thirty (30) days from the Effective Date of the Contract or before mobilization to the Site (whichever is the sooner).

Company reserves the right at all times to audit and review Contractor's facilities, services and/or performance of its activities in respect of compliance with the accepted HSSE Plan for the Work.

Company reserves the right to suspend the Work or any part thereof if Contractor does not comply with the accepted HSSE Plan at the risk of the Contractor. Before any Work is suspended Company shall liaise with Contractor to allow Contractor the opportunity to rectify any non-conformances within an acceptable timescale. Any suspension shall be carried out in accordance with the terms of the Contract.

Either party may, at any time, suspend the Work for HSSE reasons; in such event where the Contractor elects to suspend the Work, Contractor shall immediately inform Company in writing of those reasons, and provide details of actions taken to mitigate, reduce, or eliminate the reason.

It is expected that the Contractor shall have its own Standards which apply to HSSE matters and shall comply with them where applicable. Where these Standards are not available, or in the reasonable opinion of the Company, they fall below Company's own Standards then the Company shall have the right to issue its own Standards in force from time to time, to the Contractor, in order that the Contractor shall comply with these provisions.

Failure by Contractor to adhere to, demonstrate compliance with or ensure Contractor Personnel comply with the Company's HSSE Exhibit or Standards may result in termination of the Contract.

2 PROVISIONS SPECIFIC TO THE CONTRACTOR HSSE PLAN

2.1 LEADERSHIP AND ACCOUNTABILITY

It is the Company policy to protect the health, safety, and security of its employees, to minimize the risk to the public from its operations and to protect the natural environment. Contractor shall ensure that all Contractors' Personnel are briefed, understand, and strictly adhere to the provisions of this Exhibit, and any appropriate Standards, Procedures or Guidelines on HSSE.

Contractor's management shall demonstrate leadership and commitment through actively participating in all aspects of HSSE, supporting open dialogue and by allocating sufficient and competent resources to the Contract.

Contractor shall ensure that HSSE responsibilities, authorities, accountabilities, and competencies in relation to the Work are clearly defined, documented, communicated, and exercised at all levels.

Contractor shall ensure that individual and team contributions to HSSE performance are recognized and considered during performance appraisals.

Contractor shall set clear HSSE goals, objectives and targets and ensure that performance is evaluated against them.

Contractor shall formally review HSSE performance in relation to the Work at regular and frequent intervals to ensure that objectives and targets are being met and areas of concern are addressed.

2.2 POLICY AND STRATEGIC OBJECTIVES

Contractor shall ensure that its own Health, Safety, Security and Environment (HSSE) Management System, its HSSE policy and its HSSE Plan are compatible with Company's HSSE policy, objectives and HSSE Management System.

Company forbids the use or possession of: -

- Weapons
- Alcohol
- Drugs

At all its Sites, both onshore and offshore. Contractor shall comply and ensure that Contractor's Personnel comply with Company's requirements in this respect.

Contractor shall ensure that its HSSE policy and HSSE Plan are available at the Site, at all times, to all Company's Personnel and Contractor's Personnel in their working languages and shall ensure that all Contractor's Personnel comply with the requirements of both the HSSE Policy and the HSSE Plan.

3 ORGANISATION, RESPONSIBILITIES, RESOURCES, STANDARDS AND DOCUMENTATION

3.1 ORGANISATION

Contractor shall provide sufficient competent and appropriate manpower and supervision in its organization; with clear responsibilities and reporting structure to ensure that HSSE performance is not compromised.

3.2 EMPLOYEE ORIENTATION PROGRAMME

Contractor shall provide, for all Contractor's Personnel involved in the Work induction training comprising:

- An Employee Orientation Training Programme to the Site.
- Training regarding the requirements of the HSSE Plan.
- Provide to Company a record of attendance for each employee.

Contractor shall provide a simple visual method (approved by Company) that identifies Contractor Personnel that have attended the induction training. However once operating on DeNovo's site. DeNovo site induction will apply.

Contractor shall ensure that no individual works at the Site unless he has received full induction training.

4 HSSE COMPETENCE REQUIREMENTS

4.1 CONTRACTOR SHALL ENSURE ITS PERSONNEL ARE:

Medically, physically, and mentally fit to carry out the duties to which they are assigned in respect of the Work, and be in possession of a certificate to UK Oil & Gas standard, (or equivalent), if required to work offshore, and a certificate of fitness if working as an expatriate, rotator, or carrying out diving activities or traveler outside his/her home country; and

The respective contractors are expected to demonstrate that their employees are fit to work and have conducted a medical by their respective doctors that meets UKOG requirements.

Aged eighteen years or above, where they are employed to work on hazardous Sites; and

Technically competent and experienced in the tasks assigned to them.

4.2 CONTRACTOR SHALL

In respect of each individual member of the Contractor's Personnel required to work or to visit offshore, hold at all times: -

- A current Medical Certificate of Fitness issued by an Approved medical agency or doctor.
- A certified true copy of the current certificate of completion of the required training requirements.
- And prior to visit Contractor shall provide to Company a certified true copy of the aforesaid certificates prior to employment and, where applicable, any renewal thereof if so requested by Company.
- Submit to Company details of Contractor's medical screening programme, including but not limited to, details of the names and qualifications of medical agencies or doctors responsible for issuing Medical Certificates of Fitness.
- As part of the pre-qualification requirements Contractor shall ensure Contractor's Personnel are competent for the occupations and tasks to which they are assigned under the Contract.

5 HSSE TRAINING

Contractor shall be responsible for, and implement, competency based HSSE training of Contractor's Personnel and shall take account of and integrate training requirements with Company's requirements and Policies, Standards and Guidelines as may be advised from time to time.

5.1 HSSE PROMOTION AND AWARENESS

Contractor shall establish a mechanism for communication and feedback of HSSE issues and performance among Contractor Personnel on the Site and to Company.

5.1.1 HSSE PROFESSIONALS

Contractor shall provide specialist HSSE advice and supervision and respond to HSSE issues when required by the Contractor or the Company, ensuring

- As a pre-qualification requisite - All contractors are required to provide qualified personnel to meet the expectations of each role. Contractor provides sufficient numbers of experienced HSSE supervisors on Site, covered by the Contract.
- Contractor formally demonstrates the level of competence of all HSSE supervisors and accords these supervisors appropriate levels of authority which shall be communicated to the Company.
- Contractor ensures that selected supervisors are made available to Company 2-4 weeks prior to mobilization, in order that they receive instruction of Company expectations of HSSE performance.

6 SUBCONTRACTORS

Contractor shall ensure that all its Subcontractors receive a copy of and comply with the requirements of the HSSE Plan accepted by Company and are provided with a copy of this Exhibit.

6.1 HSSE COMMUNICATIONS

Contractor shall, where applicable, ensure before commencing operations pursuant to the Contract that all companies, organizations and communities that could potentially be affected by such operations have been notified and when/where necessary carried out a suitable consultation process. At the Site the Contractor shall ensure that effective toolbox talks are undertaken. Where shift work is in operation clear communications between shift workers such as shift handover notes and face to face handover shall be enforced.

Where applicable, Contractor's arrangements for emergency communications shall be integrated with the requirements of the Company and/or the Site and/or local or national or international support services.

6.2 HSSE MEETING PROGRAMME

Contractor shall establish an effective structure and schedule for HSSE meetings involving all Contractors' Personnel assigned to the Work, to promote communication and involvement in HSSE matters. Company reserves the right to participate in such meetings.

6.2.1 HSSE LEGISLATION

Contractor shall comply with, and shall be able to demonstrate compliance with:

- Relevant and applicable health, safety, security, and environmental Legislation and in particular the Trinidad & Tobago Occupational Safety and Health Act Chap. 88:08 ("OSHA") and Environmental Management Act (EM Act), Chapter 35:05 of 2000 for all places where Work is performed.
- Company Policies, Standards and Guidelines which shall be communicated to Contractor as appropriate.
- Contractor's own corporate and project specific policies and procedures.

7 HSSE STANDARDS

Contractor shall establish an HSSE Management System (HSSE-MS) in accordance with 2.2.1 of this Exhibit which meets the requirements of the Company. Contractor will document via a bridging document how it will interface with the Company HSSE-MS, and that of its key Subcontractors. A copy shall be issued to Company. Contractor's HSSE-MS shall, as a minimum include, but not be limited to, the following elements:

- Leadership and Accountability.
- Policy and strategic objectives.
- Organization, Responsibilities, Resources, Standards and Documentation.
- Evaluation and risk management.
- Planning and Procedures.
- Facilities design, construction, and commissioning.
- Emergency response planning.
- Implementation and performance monitoring.
- Auditing and review.

7.1 AVIATION (FIXED AND ROTARY WING)

All air transport shall be in line with the OGP Guidelines. Contractor shall, when the need arises to transport personnel by air by special Charter, prioritize the choice of provider in the following order: -

- International Carrier
- National Carrier
- Company approved Local Carrier

If none of the above are available, then Contractor shall provide Company sufficient relevant information on the choice of provider to assure Company that Contractor has carried out the required level of Due Diligence and that the risks to Contractor's personnel are ALARP and acceptable.

Company reserves the right to audit any proposed provider.

8 DIVING OPERATIONS

Contractor shall, prior to commencement of any diving work, demonstrate to the Company that its diving Subcontractor is the diving contractor for the purpose of the National Legislation (in the UK this is the 'Diving at Work Regulations applicable to the diving location and/or the 'IMCA International Code of Practice for Offshore Diving' in relation to all diving operations carried out under this Contract. Each diver shall be a direct employee of Contractor's diving Subcontractor and copies of divers' contracts of employment shall be produced to the Company for scrutiny prior to commencement of the Work and at any other time when required by the Company.

8.1 EVALUATION AND RISK MANAGEMENT

8.1.1 RISK ASSESSMENT

Contractor shall ensure that, for its activities, a documented risk assessment procedure and risk register are in place and operating. This risk assessment procedure shall be suitable and sufficient to appropriately assess the health, safety, security, and environmental risks involved. A copy shall be issued to Company for review.

Contractor shall be responsible for ensuring timely delivery of the risk assessment of its activities, covered in the Scope of Work, in order to meet the work schedule, the Company HSSE plan and regulatory requirements.

8.2 HANDLING OF CHEMICALS

The necessary MSDS Sheets must be communicated as a prerequisite that has been approved by the MEEI for use in the petroleum industry. Contractor shall give Company written notice within a reasonable timescale before the delivery or removal from the Site of any substance which is toxic or hazardous to health or potentially harmful to the environment. The notice shall identify the hazards and effects and assess the risks to personnel and the environment. Details of the precautions to be taken when using, handling, transporting, storing or any other means of contact will also be provided in the form of Safety Data Sheets" (SDS).

Contractor shall ensure that at all times the substance is suitably packaged and labelled and has been assessed in accordance with the requirements of an international good practice e.g., Control of Substances Hazardous to Health (COSHH Regulations), published by the UK Health and Safety Executive.

9 PPE REQUIREMENTS

Contractor shall ensure that all workers are provided with all necessary PPE at the Site. This shall, as a minimum, meet international standards and include the following:

- Safety helmet (hard hat).
- Safety glasses/goggles.
- High visibility vest or reflective bands on coveralls
- Fire Resistance Coveralls
- Safety boots
- Safety harness (for working at height/overside).
- Special equipment for hazardous / unusual activity or conditions
- Suitable gloves
- Ear / hearing protection.

Contractor shall conduct risk assessments where applicable for all activities requiring the use of personnel protective equipment (PPE) and the specification of the required PPE and provide additional and/or specialist PPE as required.

Contractor Personnel failing to use the appropriate PPE will be asked to use the appropriate equipment or stop work immediately. If the Contractor Personnel fail to use the PPE, the Company may require them to stop work and/or leave the Site immediately. Persistent repeated failures by Contractor Personnel to use appropriate PPE may result in Company requiring the Contractor to permanently remove the relevant Contractor Personnel from the Site and replace the Contractor Personnel without delay and at no extra cost to the Company.

10 PLANNING AND PROCEDURES

10.1 DENOVO LIFE SAVING RULES

The DeNovo Life Saving Rules which are incorporated by reference and apply to the Contract where relevant. DeNovo Life Saving Rules:

Life-Saving Rules are not new Industry rules. DeNovo Life Saving Rules are adopted from the International Association of Oil & Gas Producers (IOGP) and are geared to mitigate risk and reduce fatalities in the Oil and Gas industry.

DeNovo Life-Saving Rules are meant to draw attention to the activities most likely to lead to a fatality, and the life-saving actions over which an individual has control.

Compliance with DeNovo Life Saving Rules is mandatory for all individuals while on a DeNovo facility. Non-Compliance with a DeNovo Life Saving Rule will be fully investigated.

The importance of compliance with DeNovo Life-Saving Rules will be re-enforced via Recognition & Reward and Consequence Management/Disciplinary Action consistent with T&T Law for HSSE Behaviour that falls below Expectation.

Please take some time to internalize DeNovo Life Saving Rules:

The DeNovo Life-Saving Rules cover the following activities:

1. WORK AUTHORISATION
2. BYPASSING SAFETY CONTROLS

3. CONFINED SPACE
4. DRIVING
5. ENERGY ISOLATION
6. HOT WORK
7. LINE OF FIRE
8. SAFE MECHANICAL LIFTING
9. WORKING AT HEIGHT

Please refer to Appendix 20 for the DeNovo Life-Saving Rules Specific Performance Requirements

10.2 HSSE PROCEDURES

Contractor shall provide written HSSE procedures to cover high risk operations. These will be available to all Contractor's Personnel and Subcontractors in their working language. A copy shall be provided to Company for review.

Contractor shall abide by either the Company permit to work system, or a Company approved permit to work system when carrying out work on Site.

Any deviations from approved operating procedures approval necessary MOC must be approved by all key stake holders. Contractor shall provide a written procedure for obtaining Company's permission to deviate from HSSE Policies Standards or Guidelines. This will be available to all Contractor's Personnel and Subcontractors in their working language. A copy shall be provided to Company.

10.3 BASIC HSSE RULES

Contractor shall provide all its personnel and Subcontractors with basic relevant health, safety, security, and environmental rules; these shall be based on and developed from Company's Policies, Standards and Guidelines, and a copy provided to Company for review.

Contractor shall ensure that all Contractors' Personnel and Subcontractor's Personnel shall abide by all health, safety, security and environmental rules of the Company at the Site.

10.4 EMERGENCY RESPONSE PROCEDURES

In cases where there is a bridging agreement some of the emergency response accountability will reside with the respective contractor. E.g., drilling, and marine vessels. The establishment and implementation of emergency procedures related to the Work is the responsibility of Contractor. Contractor shall consult with Company to ensure appropriate interfaces with Company procedures.

Not less than forty (40) days before mobilization for commencing work Contractor shall submit to Company details of its provisions and procedures for proposed actions in the event of:

- An incident involving serious injury or death to any member of the team.
- A major incident involving third party equipment.
- Any release of chemicals or hydrocarbons to the local environment.
- Serious illness, including that needing evacuation.
- Security breach.

Contractor shall produce emergency response bridging documents to cover the extent of its work. As a minimum, this shall include bridging between:

- Contractor and Company.
- Contractor and its Subcontractors.
- Contractor and Company's other contractors working at the Site.

Contractor shall ensure competency of Contractor's Personnel in its emergency response procedures through a programme of drills and testing and shall provide to Company a record of attendance for each employee.

If required by Company, Contractor shall participate in an emergency response exercise. Company shall arrange this exercise unless, at its sole option, Company requires Contractor to organize it.

11 HSSE EQUIPMENT AND HSSE INSPECTION

Contractor shall ensure that all tools, appliances, machines, vehicles, or other equipment, are in safe working condition at all times and comply with current regulations and, where appropriate, are used only by authorized and competent persons trained in the use of such equipment. This requirement is to include all emergency response lifesaving equipment.

12 OCCUPATIONAL HEALTH

Contractor shall carry out a Health Risk Assessment process and register to identify and adequately control adverse impacts of work activities on worker's short and long-term health. The Contractor shall also establish an occupational health programme appropriate for the Site conditions and shall provide details to the Company. The Contractor shall carry out the necessary health surveillance and fitness for work medical assessments.

In cases where there is a bridging agreement some of the emergency response accountability will reside with the respective contractor. E.g., drilling, and marine vessels.

Contractor shall maintain first aid facilities for use of Contractor's Personnel and those of its Subcontractors.

13 ENVIRONMENT

- Contractor shall protect environmental resources by applying best available techniques, known as "BAT", to preferably eliminate, or minimize any direct or indirect impact from operations.
- Contractor shall ensure that all activities are planned in a manner that will not create unnecessary danger, disturbance, or effects on the environment or to other users.
- Contractor shall minimize, nuisance, disturbance or interference to the community, their activities, and other users of the environment.
- Contractor shall unless otherwise directed by Company, avoid conducting activities in protected areas or where there is an unacceptable risk of damage to sensitive environmental resources.
- Contractor shall ensure that fishing, hunting, and gathering of flora and fauna or any other environmental resources are strictly prohibited within the area impacted by the Work.
- Contractor shall where applicable be responsible for restoration of any land used or affected by Contractor's activities under the Contract. This will include removal of Contractor's equipment, surplus materials and waste to the satisfaction of Company Representative.

- Where Contractor is responsible for disposal of any waste produced or occurring as a consequence of its operations pursuant to the Contract, all such disposals shall be in accordance with all legislation, Company standards and best practice whether that shall be for hazardous waste or non-hazardous waste. Contractor shall ensure that all necessary approvals or licenses are obtained and that any Subcontractors utilized for this purpose fully comply with such requirements. Contractor shall provide Company with a copy of each waste transfer note.
- Contractor shall notify Company in writing of the method for managing disposal of all hazardous waste and gain approval therefore before commencing such disposal. Contractor shall not deviate from agreed disposal methods without prior Approval from Company.
- Contractor shall, where applicable, be responsible for measuring, monitoring, and reporting environmental emissions in line with all legislation and Company requirements.

14 SECURITY

In cases where there is a bridging agreement some of the emergency response accountability will reside with the respective contractor. E.g., drilling, and marine vessels. Contractor and its Subcontractors and suppliers shall be able to demonstrate that they operate a robust security system for Company's materials and data storage, including conducting periodic audits and review of the security arrangements in place with a view to improve the security system if deficiencies are identified.

- Contractor shall ensure that all Contractor's Personnel and Subcontractors shall abide by all security procedures and rules of the Company when entering, working at and leaving Company sites.
- Contractors shall undertake an assessment of the security risks to their operation and develop and implement a robust security programme to mitigate the identified risks to their people, premises, materials, equipment, and information. A copy of this plan should be provided to the Company.
- Contractors shall develop a crisis management plan and equip and train a local incident management team to respond to major incidents.
- Where applicable Contractors shall appoint a security manager/representative to be the focus on all aspects of Security and to liaise with the Company's security manager/representative.
- Contractors shall provide security awareness training for all staff commensurate with the identified risks.
- Where applicable Contractors shall undertake a fraud risk assessment and develop and implement an effective fraud risk management programme.

15 IMPLEMENTATION AND PERFORMANCE MONITORING

15.1 GENERAL

- Contractor shall establish an HSSE performance monitoring programme and provide a copy of the monitoring programme, and regular reports to Company.
- Contractor shall report all incidents in accordance with the Company requirements, the definitions of incidents shall be in accordance with the current Occupational Safety & Health Administration (OSHA)/ Oil and Gas Producers (OGP) Guidelines.
- Contractor shall provide each month a report of lost time injuries (LTI), restricted workday cases (RWDC), medical treatment cases (MTC), medical evacuations, High Potential Incidents (HPI), first aid cases (FAC), and near misses and frequency of hazardous occurrence (numbers of hazardous situations without details) for all Contractor's Personnel engaged in the Work, this is to include all Subcontracts, stating the number of LTI's and the total number of man-hours worked and lost and the number of kilometers driven both during the month and cumulatively. Contractor shall also provide details of any occupational illnesses resulting from the Work.

- Contractor shall implement a Behavior-Based Safety (BBS) process on site aiming at:
 - Identifying workforce behaviours, with reference to specific risks, that have impacts on HSSE performance; keeping this checklist dynamic based on current risk assessments and performance.
 - Training observers from workforce, keeping a ratio of at least 1 observer for each 20 workforce members.
 - Systematically observing workforce compliance with the identified behaviours and positively reinforcing desired behaviours through feedback and coaching.
 - Measuring safety by producing numerical ratio of safe/unsafe behaviours.
 - Identifying unsafe behaviours trends and addressing these by conducting analysis - Antecedent-Behavior-Consequence (ABC) and Root Cause Analysis (RCA) - to develop and implement improvement plans.
 - Setting improvement goals; recognizing and reinforcing improvements and goal-attainment.
 - Removing system barriers for safe behaviours by modifying the work environment – facilities, equipment, process.
 - Establishing a framework consisting of:
 - BBS committee – to run the process.
 - BBS champion – to enable resources for improvements.
 - BBS advisor – to facilitate trainings, coaching, database, communication; to review and sustain the process.
 - Contractor shall provide a copy of the BBS process and regular reports to the company.
- Contractor shall provide Company with copies of all correspondence received from or sent to any person concerning HSSE matters relating to Contractor and Subcontractor activities under the Contract.
- Contractor shall, where applicable, maintain a waste logbook.
- Contractor shall maintain a public complaint logbook.

16 INCIDENT INVESTIGATION

- Contractor shall comply with Company's incident investigation and reporting requirements.
- Contractor shall provide Company with a copy of any report or statement or written evidence concerning any accident, medical condition, dangerous event or near miss which occurs during the performance of the Work or any other information indicating the existence of adverse health, safety, security, or environmental conditions of which Contractor's Personnel may become aware within twenty-four (24) hours of the incident.
- Contractor shall report fatalities immediately. All incidents with a severity of a Lost Time Injury (LTI) or worse, including Restricted Workday Cases (RWC) shall be immediately notified to Company in writing, be subject to full root causes investigation and detailed reports provided to Company within seven (7) days of the incident. Company reserves the right to participate in any incident investigation carried out in connection with the Work.
- Contractor shall document and report immediately to Company any incidents of environmental damage, any unforeseen activity or event which could have led to environmental damage, uncontrolled release of hydrocarbons, breaches or potential breaches of environmental regulations or complaint from local groups, organizations including enforcement agencies or individuals.

17 AUDITING AND REVIEW

- Contractor shall establish a schedule for HSSE audit / inspection for its activities and those of its primary Subcontractors and provide a copy of the schedule to Company.
- Contractor shall provide all input and support as Company deems successfully carried out and the actions arising are closed out to Company's satisfaction. Contractor's Personnel shall be available for interview as part of Company audits and reviews.
- Company reserves the right to attend any HSSE audit/inspection and must be provided with the necessary notification in due time to organize mobilization.
- Before commencement of the Work, Company may, at its sole option, conduct an audit to satisfy itself of Contractor's arrangements regarding HSSE matters. Contractor shall co-operate fully with the audit team and correct any agreed deficiency noted without undue delay and in any event before Work commences.
- Upon request, Contractor shall supply Company with copies of all reports and documents regarding HSSE matters that it is required by legislation to maintain together with such other reports and information as Company may require.
- Contractor shall maintain and make available for inspection by Company upon request all registers, records and any other documentation on environmental aspects of the activities being carried out or on the environmental management system implemented by Contractor
- Contractor shall provide a report on HSSE performance during the contract, as part of the contract close-out documentation.

18 INCENTIVES

If the Company and the Contractor agree that in order to reinforce effective safety behaviours and establish a culture of open learning and reporting a financial incentive scheme is appropriate, then they shall ensure that the goals and objectives of such financial incentives are agreed prior to Work commencing. These financial incentive schemes should be governed by some guiding principles which are set out below: -

- Recognize and reinforce safe behavior.
- Focus more on leading than lagging indicators.
- Be divorced from scheduling and productivity programmes.
- Be supported and financed by both Company and Contractors.
- Capitalize on social reinforcement.
- Comprise a combination of team and individual rewards.

It should also be recognized that financial incentives may, if not communicated appropriately, engender less favourable behaviours. Due consideration and mitigations should be agreed at the time to manage this risk.

19 REFERENCES

- International Association of Oil and Gas Procedures IOGP Life Saving Rules Report 459
- International Association of Oil and Gas Procedures IOGP Process Safety Fundamentals

20 APPENDIX

20.1 HSSE DEFINITIONS

- HSSE – Health Safety Security and Environment
- ALARP- As Low as reasonably practicable
- OSHA- Occupational Safety and Health Act
- HSSE-MS- Health Safety Security Environment Management System
- OGP- Oil and Gas Producers
- SDS- Safety Data Sheets
- COSHH- Control of Substances Hazardous to Health
- PPE – Personnel Protective Equipment
- BAT- Best Available Techniques
- LTI- Lost Time Injury
- RWDC- Restricted Workday Cases
- HPI- High Potential Incidents
- MTC- Medical Treatment Cases
- FAC- First Aid Cases
- BBS- Behaviour Based Safety
- ABC- Antecedent Behaviour Consequence
- RCA- Root Cause Analysis

20.2 DENOVO LIFE SAVING RULES

The DeNovo Life-Saving Rules cover the following activities:

1. Work Authorization
2. Bypassing Safety Controls
3. Confined Space
4. Driving
5. Energy Isolation
6. Hot Work
7. Line Of Fire
8. Safe Mechanical Lifting
9. Working At Height

<p>Line of Fire</p> <p>Keep yourself and others out of the line of fire</p>  <ul style="list-style-type: none"> I position myself to avoid: <ul style="list-style-type: none"> – moving objects – vehicles – pressure releases – dropped objects I establish and obey barriers and exclusion zones I take action to secure loose objects and report potential dropped objects 	<p>Safe Mechanical Lifting</p> <p>Plan lifting operations and control the area</p>  <ul style="list-style-type: none"> I confirm that the equipment and load have been inspected and are fit for purpose I only operate equipment that I am qualified to use I establish and obey barriers and exclusion zones I never walk under a suspended load 	<p>Working at Height</p> <p>Protect yourself against a fall when working at height</p>  <ul style="list-style-type: none"> I inspect my fall protection equipment before use I secure tools and work materials to prevent dropped objects I tie off 100% to approved anchor points while outside a protected area
<p>Work Authorisation</p> <p>Work with a valid permit when required</p>  <ul style="list-style-type: none"> I have confirmed if a permit is required I am authorised to perform the work I understand the permit I have confirmed that hazards are controlled and it is safe to start I stop and reassess if conditions change 	<p>Bypassing Safety Controls</p> <p>Obtain authorisation before overriding or disabling safety controls</p>  <ul style="list-style-type: none"> I understand and use safety-critical equipment and procedures which apply to my task I obtain authorisation before: <ul style="list-style-type: none"> – disabling or overriding safety equipment – deviating from procedures – crossing a barrier 	<p>Confined Space</p> <p>Obtain authorisation before entering a confined space</p>  <ul style="list-style-type: none"> I confirm energy sources are isolated I confirm the atmosphere has been tested and is monitored I check and use my breathing apparatus when required I confirm there is an attendant standing by I confirm a rescue plan is in place I obtain authorisation to enter
<p>Driving</p> <p>Follow safe driving rules</p>  <ul style="list-style-type: none"> I always wear a seatbelt I do not exceed the speed limit, and reduce my speed for road conditions I do not use phones or operate devices while driving I am fit, rested and fully alert while driving I follow journey management requirements 	<p>Energy Isolation</p> <p>Verify isolation and zero energy before work begins</p>  <ul style="list-style-type: none"> I have identified all energy sources I confirm that hazardous energy sources have been isolated, locked, and tagged I have checked there is zero energy and tested for residual or stored energy 	<p>Hot Work</p> <p>Control flammables and ignition sources</p>  <ul style="list-style-type: none"> I identify and control ignition sources Before starting any hot work: <ul style="list-style-type: none"> – I confirm flammable material has been removed or isolated – I obtain authorisation Before starting hot work in a hazardous area I confirm: <ul style="list-style-type: none"> – a gas test has been completed – gas will be monitored continually

20.3 PROCESS SAFETY FUNDAMENTALS

1. We Respect Hazards
2. We Apply Procedures
3. We Sustain Barriers
4. We study within operating limits
5. We maintain safe isolation
6. We talk the line
7. We control ignition sources
8. We recognize change
9. We stop if the unexpected occurs
10. We watch for weak signals

20.4 WE RESPECT HAZARDS:



- We improve our understanding of process safety hazards at our location and our roles in controlling them.
- We are vigilant about the potential impacts of uncontrolled process safety hazards.
- We discuss process safety hazards before starting a task.
- We bring forward process safety hazards to be included in activity risk assessments.

20.5 WE APPLY PROCEDURES:



- We use approved operating and maintenance procedures, even if we are familiar with the task.
- We discuss the key steps within a critical procedure before starting it.
- We pause before key steps and check readiness to progress.
- We stop, inform supervision, and avoid workarounds if procedures are missing, unclear, unsafe, or cannot be followed.

20.6 WE SUSTAIN BARRIERS:



- We discuss the purpose of hardware and human barriers at our location.

- We evaluate how our tasks could impact process safety barriers.
- We speak up when barriers don't feel adequate.
- We perform our roles in maintaining barrier health and alert supervision to our concerns.
- We use an approval process for operations with degraded barriers.

20.7 WE STAY WITHIN OPERATING LIMITS:



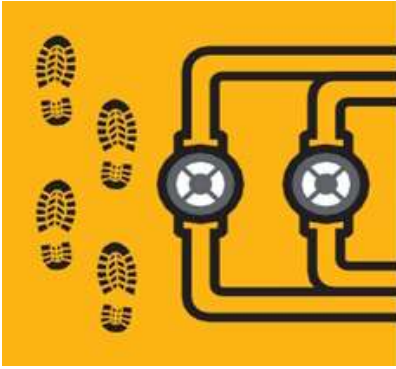
- We discuss and use the approved operating limits for our location.
- We escalate where we cannot work within operating limits.
- We alert supervision if an alarm response action is unclear or the time to respond is inadequate.
- We obtain formal approval before changing operating limits.
- We confirm that potential for overpressure from temporary pressure sources has been addressed.

20.8 WE MAINTAIN SAFE ISOLATION:



- We use isolation plans for the specific task, based on up-to-date information.
- We raise isolation concerns before the task starts and challenge when isolation plans cannot be executed.
- We check for residual pressure or process material before breaking containment.
- We monitor the integrity of isolations regularly and stop to reassess when change could affect an isolation integrity.
- We confirm leak-tightness before, during, and after reinstating equipment.

20.9 WE WALK THE LINE:



- We use up-to-date documentation (e.g., P&IDs) that accurately reflect installed systems and equipment.
- We physically confirm the system is ready for the intended activity (e.g., valve positions, line up of relief devices, etc.).
- We alert supervision to identified documentation and readiness issues before operation.

20.10 WE CONTROL IGNITION SOURCES:



- We identify, eliminate, or control the full range of potential ignition sources during task risk assessments and during job preparation and execution.
- We minimize and challenge ignition sources even in “non-hazardous” areas.
- We eliminate ignition sources during breaking containment and start-up and shutdown operations.

20.11 WE RECOGNIZE CHANGE:



- We look for and speak up about change.
- We discuss changes and involve others to identify the need for Management of Change (MOC).
- We review the MOC process for guidance on what triggers an MOC.

- We discuss and seek advice on change that occurs gradually over time.

20.12 WE STOP IF THE UNEXPECTED OCCURS:



- We discuss the work plan and what signals would tell us it is proceeding as expected.
- We pause and ask questions when signals and conditions are not as expected.
- We stop and alert supervision if the activity is not proceeding as expected.

20.13 WE MONITOR AND SCRUTINIZE FOR WEAK SIGNALS:



- We proactively look for indicators or signals that suggest future problems.
- We speak up about potential issues even if we are not sure they are important.
- We persistently explore the causes of changing indicators or unusual situations.