



Group Health, Safety, Environment and Security Handbook

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1. Introduction

We believe that all our people are entitled to the same level of protection regardless of where in the world they work. To ensure a consistent approach to safeguarding Health, Safety, Environment and Security we have developed a global HSE Management System supported by our HSE processes, procedures, instructions and guidelines, as well as a mature security system.

Subsea 7's Business Management System is a controlled suite of documentation of which this document forms a part.

The guidance given in this handbook:

- Identifies key features of HSE management process rules which you must understand and comply with, if Subsea 7 is to achieve consistent HSE objectives
- Tells you about the Group's HSE goals, objectives and culture
- Provides an overview of how Subsea 7 expects you to work safely using the processes which form the elements of our Management System
- Lists issues concerning your safety with which you need to become familiar when you join a worksite
- Identifies Subsea 7's collective responsibilities and the role of the HSE departments with regards to HSE management
- Empowers you to address unsafe conditions in your work place or to stop unsafe behaviour by work colleagues
- Promotes the reporting of all near miss incidents, damage, illnesses and injuries so that Subsea 7 can learn from any mistakes and make improvements
- Provides lists of topics to help you assess the risks associated with work tasks and to assist you when involved in toolbox talks or similar
- Leads you in maintaining your security by listing the key security actions you should take

People who are new to Subsea 7 may be unfamiliar with how Subsea 7 manages HSE in their working environment. Please do not hesitate to ask your supervisor to explain anything you are unsure about or tell you more about HSE.

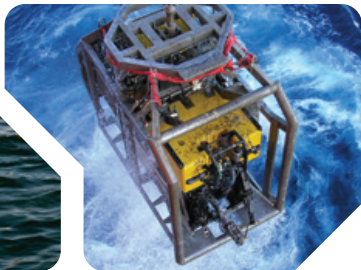
2. Safety is a core value

We are committed to an incident-free workplace, every day, everywhere.

We continue to minimise the impact of our activities on the environment.

We share and embrace the following core values:

- Safety
- Integrity
- Innovation
- Performance
- Collaboration



3. Message from the Chief Executive Officer

Safety is one of our core values, and we believe that by working together with integrity, we will create an incident-free Subsea 7 workplace every day, everywhere.

We can make this a reality if we have the right attitude to health, safety, environmental and security management: by following Group instructions and procedures; by upholding our own high standards and never cutting corners; by helping others who may be new to a particular worksite and by challenging those who disregard our rules. We all have a part to play. Our project management teams will help you succeed by setting safety priorities as part of the project work execution.



I believe that safety, quality and good management are inextricably linked.

A safe worksite is a well run worksite. A well run worksite, onshore or offshore, is a safe place to work.

This handbook will give you an overview of how we manage HSE issues across our business. It also introduces the key management principles that you must follow on our barges, ships and in our yards or offices – all worksites.

Day to day management of HSE is a line management responsibility supported by our HSE professionals.

Please take the time to read this document carefully. Keep it with you as a useful reference and act on the advice it offers. Make sure you do not become complacent. Remember: it is vital to maintain your safety focus at all times. If we all do so, we can create a business which is second to none in terms of safe project delivery.

Jean Cahuzac

Chief Executive Officer

4. HSEQ policy statement

Subsea 7 is committed to an incident-free workplace, every day, everywhere. Our performance depends on our ability to continually improve the quality of the services we provide to our clients, while protecting people and minimising the impact on the environment. Subsea 7 requires an active commitment to HSEQ from all our people and our contractors in all work activities. Line managers are responsible and accountable for ensuring compliance with all HSEQ policies and procedures and this Corporate HSEQ Policy. We will always communicate openly on HSEQ issues with our stakeholders and share with them our experience and knowledge of successful HSEQ initiatives.

Policy implementation

The Company has an HSEQ Committee which oversees all HSEQ matters. This Committee is chaired by the Chief Executive Officer and establishes procedures and guiding principles as it deems necessary to carry out the Company HSEQ policy. The Company has established and maintains assessment, self-evaluation and audit programmes to monitor the Company's compliance with this Policy. A Compliance audit report is presented to the Subsea 7 S.A. Board of Directors at least once a year.

Compliance with relevant legislation

The Company standards comply with all applicable laws and regulations in the countries where we operate.

Risk Management

The Company strives to mitigate the impact of any foreseeable hazards, which may endanger health, safety and the environment, or could affect the quality of products and services it provides. This will be achieved through formal risk assessments as required per Company Policies and Procedures.

Training

The Company is committed to provide training and development needs as appropriate for each individual's duties and responsibilities – this will always include HSEQ training. Line managers are responsible for ensuring that appropriate training is given and individual competency evaluation is conducted as per the Company's standards.

This policy will be regularly reviewed to ensure on going suitability. This is critical to the continuous success of our business as it allows us to optimise our Company performance and adds value for all our stakeholders.

4.1 HSEQ common principles

The following principles provide a common foundation across the Group on which our HSEQ and Security policies are built:

- We work according to applicable laws, codes and regulations
- We comply with approved procedures, rules and instructions
- We provide our people with all necessary information, instruction and supervision
- Our people are trained and competent for the tasks they are expected to complete
- We provide Safe Systems of Work (SSOW) facilitated by efficient planning, robust risk assessment and effective management of change
- All incidents must be reported and investigated and remedial actions assigned and completed
- Clear objectives are set and progress is regularly reviewed
- Documentation is reviewed in accordance with a scheduled programme or after a significant change



4.2 Health

We manage business activities to keep health risks to a minimum.

We provide a healthy working environment with the appropriate level of surveillance and support.

We provide expert medical support to our people to ensure that appropriate health examinations and preventative medicines are provided.

We promote good occupational health by ensuring compliance with regulatory requirements and by providing clear guidance and information through our health principles.

Health principles

We will:

- Work according to applicable health laws, codes and regulations
- Promote and maintain a positive health culture
- Provide and maintain healthy working conditions
- Consult our people on matters affecting their health
- Assess and control the health risks arising from our work activities
- Strive to prevent work-related ill health
- Make appropriate medical care available at all work-sites



4.3 Safety

We operate a risk management approach to our activities whereby we identify hazards, assess the associated risks and then work to eliminate the hazards or reduce the risks to a tolerable level. All of our vessels operate under the International Safety Management Code (ISM).

Everyone who observes an unsafe situation or who feels it is not safe to continue with a task has a duty to intervene and stop the job. Such intervention will always be supported by Subsea 7's Management.

We are convinced that encouraging safe behaviour and highlighting the importance of personal safety as a way of life will help to create a work environment where our people are safe and secure.

Our safety culture and management are supported by the subsea safety principles which includes all safety training.

Subsea safety principles

We will:

- Work according to applicable safety laws, codes and regulations
- Promote and maintain a positive safety culture
- Review every incident and implement actions to prevent future occurrence
- Assess and control any safety risks arising from our work activities
- Consult our people on matters affecting their safety
- Provide and maintain safe work equipment and places of work
- Control, use and store hazardous substances safely

4.4 Environmental

We always conduct our business in a way that considers the environment and which aims to keep any negative impact to a minimum. This policy is managed by close attention to achieving regulatory compliance and continually improving our environmental performance through careful selection of consumables and working practices designed to reduce waste, energy consumption and emissions.

Awareness of the impact that our activities may have on the environment and the management of measures to control such impacts is encouraged through our environmental principles.

Environmental principles

We will:

- Work according to applicable environmental laws, conventions, protocols and regulations
- Promote and maintain a positive environmental culture
- Manage our activities to eliminate or reduce any potential negative environmental impact
- Consider sustainability an important element in the way we do business
- Use planning, design and risk assessment to avoid and reduce environmental risk; environmental aspects and registered work are assessed on worksites and projects

Clean Operations Initiative

The initiative saves fuel, reduces air emissions and improves the efficiency of our operations.

Execution can take effect as long as the operation is safe and within the contract terms.

Anything equal to or more than 0.5m³ fuel saved is classified as a recordable Clean Operation!



4.5 Security

Subsea 7 is absolutely committed to providing our people with secure arrangements for their work environment and for away from home activities such as travel and business trips. We operate security networks on both a regional and global basis to manage security issues, to develop and implement security plans and to monitor local security intelligence. It is our policy to engage with local communities and to be sensitive to any local community issues.

Subsea 7 works in compliance with the International Ship and Port Facilities Security Code (ISPS), and we maintain ship and worksite security plans which are regularly tested.

Subsea 7 maintains its effective security programmes through compliance with international protocols, ships' flag-state rules, industry best practice and our own rules and procedures.

Security principles

We will:

- Promote and maintain a positive security culture
- Assess and manage threats so that we can protect our people and assets
- Take account of security issues in all aspects of our operations and planning

Key points

- Refer to Subsea 7 travel packs when travelling overseas
- Follow all travel instructions and local rules
- Keep your possessions close to you
- Do not attract attention to yourself
- Always have a contact list in country

4.6 Substance abuse policy

Everyone on a Subsea 7 worksite has the responsibility to be fit and ready to carry out his or her work duties at all times, without risk of their performance being impaired or their competence reduced by substance abuse.

Subsea 7 will not tolerate the use of alcohol or any other prohibited substance on any worksite.

Arriving at a Subsea 7 worksite or business meeting under the influence of alcohol in any amount is strictly prohibited.

To maintain a workplace that is free from substance abuse, Subsea 7 may conduct searches, pre-employment screening, random tests or post-incident tests for drugs and alcohol.

Abuse of alcohol or other prohibited substances will result in disciplinary procedures. Subsea 7's Human Resources Departments will ensure correct local application of this policy, in accordance with legislation.



4.7 Jewellery policy

The wearing of jewellery is not permitted at the workplace, defined as follows: every ship, barge, workshop, construction yard, warehouse, stores area or the like, and includes any office facility where the work activity involves any risk from wearing jewellery.

Specifically, the wearing of finger rings, earrings and facial jewellery is prohibited in the workplace. The wearing of bracelets and necklaces is also prohibited in the workplace; the only exception is for medical bracelets which should be of the 'open copper' type or close fitting and covered by clothing and personal protective equipment, such as coveralls.

Where other jewellery is worn, such as that associated with body piercing, this is only permitted where the jewellery is continuously and completely covered by clothing such as coveralls or catering jackets.

Wrist watches must be removed when working with moving equipment and machinery.

This policy is to be maintained by everyone at Subsea 7 whilst working or visiting a workplace of a client, subcontractor or third party facility.

4.8 Knife policy

The use of clasp or sheath knives is to be avoided, and wherever possible an alternative cutting tool must be used. Where a knife is considered to be the safest and most appropriate tool, it must be used with care and safety gloves with the appropriate cut protection. Stop and assess the risk.

Knives are to have round-ended blades to minimise stabbing injuries. Divers' knives (underwater use), galley knives (galley use) and cutlery (galley use) are excluded from this hardware requirement.

People are not permitted to bring their own knives to work. Appropriate cutting tools will be maintained and provided at the worksite. Cutting tools and safety knives should be inspected prior to use, any damage reported and a replacement sourced.

4.9 HSE awareness at onshore and offshore worksites

We have set specific HOUSE RULES which must be complied with at all worksites, whether offshore or onshore, in an office, fabrication yard, shipyard or workshop. Your supervisor will be able to help you to access these and any local HSE rules and documents.

You are required to remain alert to other operations going on around you.

Never take short cuts that could put your own or other people's safety at risk or cause harm to the environment.

Do not assume that a piece of equipment is safe to use because it has been delivered to the worksite. Make sure it has been checked thoroughly before it is used for the first time.

If you work offshore you must be particularly careful when the motion of the ship or barge is being adversely affected by weather conditions. Site specific issues will be detailed in HSE plans or Ships Marine Operations manuals.

Never use a chemical without familiarising yourself with the hazards (control of substances hazardous to health). Familiarise yourself with requirements for waste segregation on the site. Avoid any spillage of oil and chemicals by good housekeeping and operating practices. Report any incidents.

House rules

1. Always follow safety sign information
2. Keep work sites clean, tidy and obstruction free
3. Use the right tool in the right way for the job
4. Use the correct manual handling technique if manual handling cannot be avoided
5. Hold the handrail on stairs, walk, do not run
6. Always plan every lifting operation
7. Never cross safety barriers or enter prohibited areas
8. When risk assessing task plans, always consider the environmental conditions and their effects
9. Always wear vehicle seat belts and never use a hand held mobile phone when driving
10. Wear and maintain the correct PPE

5. Your duties and responsibilities

To make sure that we all work to the same basic standards, you must:

- You have an obligation to stop any activity or operation which you consider unsafe (including those of subcontractors)
- Always be aware of your own safety and the safety of others
- Prevent damage to equipment and the environment
- Comply with all policies, procedures and rules
- Read and understand Critical Safety Behaviours and avoid exhibiting 'at risk' behaviours proven to cause almost all of Subsea 7's injuries
- Work safely in accordance with Subsea 7's processes, procedures and rules
- Think about the hazards and risks you and others may be exposed to before you start, and during the execution of any task and take the necessary precautions to mitigate these risks
- Not take short-cuts
- Be aware of safety issues at all times even after work is over – remember injuries can also happen when you are off shift
- Bring your HSE concerns to the immediate attention of your supervisor
- Report promptly all unsafe conditions and practices (including those of subcontractors) to your supervisor
- Report all injuries and illnesses, no matter how minor, to your supervisor or the medic promptly
- Report equipment damage, near misses and every spill/release to your supervisor
- Always use the proper safety equipment/PPE
- When travelling/working in malarial regions, take the prescribed chemoprophylaxis medication, use repellent and protective clothing
- Ensure you travel with valid certificates (survival, medical, vaccinations and malaria compliance attestation when applicable)
- Ensure your physical examination/health screening is up to date
- Ensure you have understood your worksite induction and participate in toolbox talks on each shift
- Follow all security instructions
- Use tools for their intended purpose only - no unauthorised modifications or use of sub-standard equipment

6. Leadership duties and accountability

Managers and team leaders have overall responsibility for and are held accountable for the health and safety of people working for them. This includes the protection of people, the environment and equipment on their worksite.

Their responsibility includes activities such as:

- Conducting risk assessment and evaluation
- Providing safe operational procedures
- Providing safe equipment
- Ensuring a robust permit to work system is used where special activities or non-routine work takes place
- Ensuring good worksite housekeeping
- Carrying out safety induction/familiarisation training
- Listening to workers' concerns with regard to safety and acting on them
- Promoting the Critical Safety Behaviours campaign
- Intervening when at-risk behaviour is observed
- Setting a good example through personal leadership and the promotion of health, safety and environmental policies and initiatives
- Demonstrating accountability through performance reviews, counselling and disciplinary action
- Leading investigations into injuries, accidents and high potential incidents, contributing to the reports and ensuring follow up of actions and provision of feedback
- Ensuring people working under supervision have received adequate training to enable them to perform their assigned tasks safely
- Conducting management site visits and reporting findings



7. Short service worker programme

Subsea 7 has implemented a programme on specific worksites to identify, train and monitor workers who are new to that worksite, and/or the company. These workers should be easily identified. In an offshore environment Subsea 7 people must pay attention to those new to the site, watch out for their safety and ensure they understand the activities taking place in their surroundings.

8. Training requirements

Subsea 7 has multiple levels of awareness and training programmes depending on each individual's activities and worksite environment.

Everyone will undergo an HSEQ introduction to the company and a site specific induction. If your role requires specialised qualifications and training, whether it is internal or external, this will be addressed.

HSE training summary

Familiarisation Training DVD or E-learning in groups	Foundational Training E-learning	Intermediate Training Classroom
Subsea 7 Values Subsea 7 Policies Subsea 7 Safety Culture Safe Conditions Critical Safety Behaviours Risk Assessment Management of Change Permit to Work Working at Height Confined Space Entry Safe Use of Work Equipment Manual Handling Chemical Management Lifting Noise, Environment Check it!	Manual Handling Foundation Noise Foundation Lift Planning Foundation Scheme of Assurance for Work Equipment Critical Safety Behaviours Foundation Risk Assessment Foundation Hazardous Substances Foundation	Permit to Work Management of Change Risk Assessment Safety Leadership Working at Height Taproot - Root Cause Analysis
		Advanced Training Direct Coaching
		Miscellaneous Topics

9. HSE induction - what you need to know

When visiting a worksite for the first time you must attend a 'safety induction' as soon as possible after your arrival. Your induction may include the following issues:

- Organisation at the worksite – roles and responsibilities
- The Emergency Plan and its location, alarms, and responses
- Overview of work areas, “no-go” areas and general traffic areas
- Muster points and escape routes
- Survival craft and equipment
- Man overboard actions
- Fire fighting equipment
- First aid treatment and location of equipment
- Safety signs and their meaning – PPE areas, first aid, warnings etc
- Identification of safety representatives
- Review of safety notice board
- Smoking rules and smoking/no smoking areas
- Worksite waste disposal and segregation procedure
- Worksite security procedures
- HSE Risk Assessment system at the site
- Permit to work system and type of work which requires a permit
- Hazardous areas and precautionary measures
- Confined space working
- Handling of dangerous substances
- Protective clothing, equipment and what you must use in your job
- Reporting of incidents, damage and injuries
- Reporting of HSEQ observations
- Project/location specific information

When you have read this HSE handbook and attended your induction, you will understand better how we can all successfully manage HSE together. Remember to ask your supervisor or manager for further help if you do not understand any aspect of this handbook or the induction.

10. Cultural awareness

Subsea 7 operates globally and you may be required to work in or travel through parts of the world where the culture and environment is not familiar to you. Please behave respectfully towards the citizens and customs of other countries at all times.

In most instances, Subsea 7 will arrange the services of reputable agents to assist in your transfer to your place of work and to provide help and assistance in dealing with issues such as:

- Personal security
- Health
- Personal property and baggage
- Visas and travel documents
- Internal transportation, meals and accommodation in transit

Your Subsea 7 Management Team will also provide you with current information and advice on ways to minimise exposure to particular health risks in the countries in which you will work or through which you will travel.

Please take the time to study the information and advice provided.

Always follow the instructions of the reputable agents and / or local security teams provided by Subsea 7.



11. Malaria control plan

Subsea 7 has established a Malaria Control Plan to protect vulnerable people by providing:

- A. Awareness
- B. Bite Prevention
- C. Chemical Prophylactics
- D. Diagnosis and Treatment

The ultimate aim of this policy is to have no cases of malaria amongst people who do not have a natural immunity, i.e. people who are not indigenous to countries where malaria is endemic.



The Malaria Control Programme applies to every person required to travel for Subsea 7 to an area where there is a risk of contracting malaria, onshore as well as offshore. Our people are required to participate in the programme and to confirm their agreement to participate by signature on the Malaria Control Plan Attestation Form.

12. Smoking rules

Each Subsea 7 office, barge, ship and worksite has defined areas where smoking is permitted. Smoking is only permitted in designated areas. You must comply with the 'no smoking' signs.

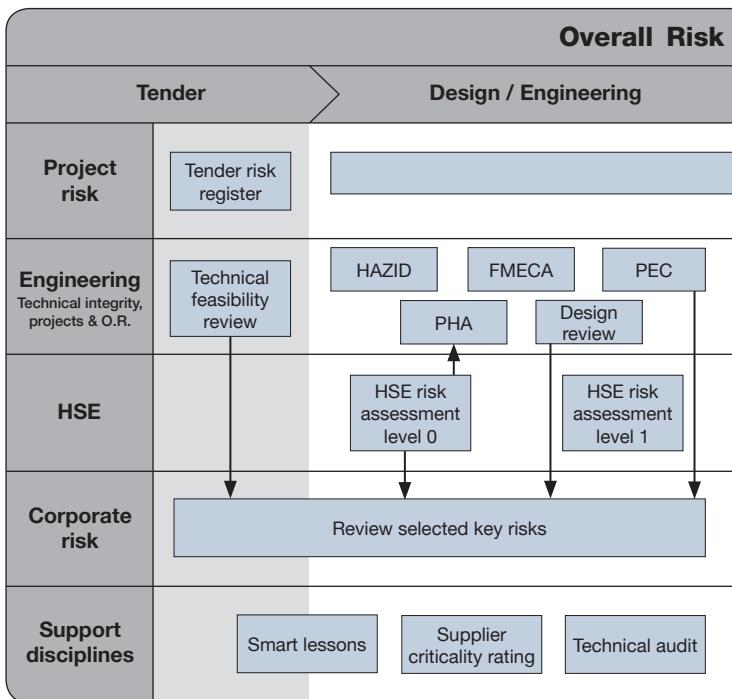
13. Fatigue

Fatigue due to long working hours, or lack of rest caused by circumstances such as travel, may affect your ability to concentrate, presenting a safety hazard to you or your work colleagues.

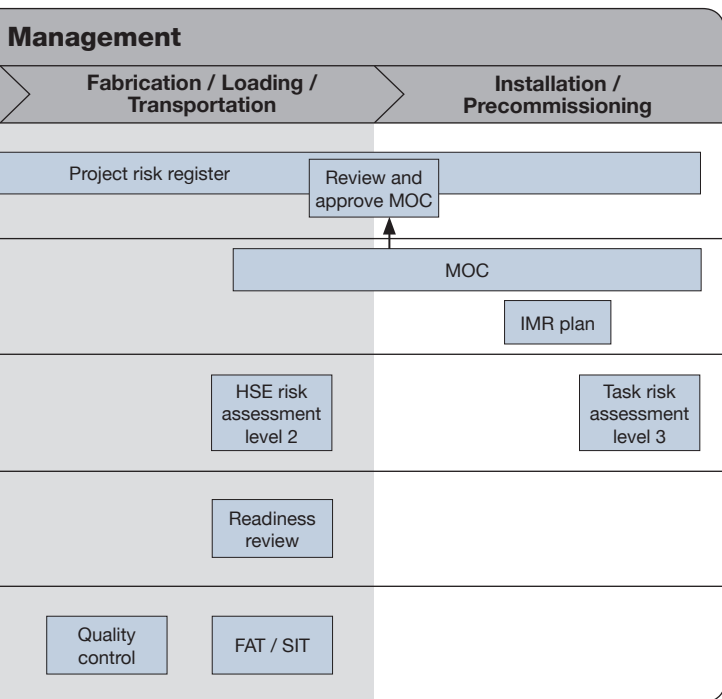
Please notify your supervisor if you feel that your concentration is likely to be affected by fatigue. Your supervisor will try to arrange shift rotations so that you are rested before commencing your work, or your shift duration is reduced to avoid a related hazardous condition.

14. Risk Management

Risk Management is a key component in our Business Management System that identifies, evaluates and determines the means of reducing risks to an acceptable level across a wide range of factors to protect people, the environment, assets and to avoid loss.



Subsea 7 has procedures to systematically identify and evaluate the hazards and effects that might arise from our activities and from the materials that are used or encountered in them. The scope of the Risk Management process ranges from design through to fabrication, installation and operation. Risk Management in Subsea 7 is covered by the different methodologies shown on the following chart, including Risk Assessment (RA) level 0, 1, 2 and 3.



15. Management of Change (MOC)

Experience has shown that incidents such as injury or damage are often caused by not following the planned course of action due to some form of unexpected change. Control of change must be as rigorous as the initial planning and risk assessment of our activities. This means that we need to re-assess risks associated with the change. We do this through a defined Management of Change process (see Management of Change process document). Its key features are:

- Changes to the planned procedure are subjected to hazard identification risk assessment and control analysis
- Changes are subject to approval by Management/Supervision in accordance with the MOC process before the work is carried out
- People involved in the work must be told about the new procedure or equipment and risks prior to the work
- Work cannot proceed until the change has been re-assessed, approved and the revised procedures explained to those involved in the task

Examples:

- Damaged rigging has required a change in configuration using available rigging onboard. This change is subject to the full MOC process
- An offshore crew has devised an improved methodology for executing a portion of the work addressed in the procedure. This change is subject to the full MOC process



16. Permit to Work (PTW)

Subsea 7 operates a Permit to Work (PTW) system at worksites to control non-routine or special work activities that could present a health or safety risk to anyone or risk of environmental damage as identified in risk assessment (see Permit to Work process document). Examples of where this process would apply:

- Non routine welding, burning or grinding where flammable materials are present (complemented by Hot Work Checklist)
- Dealing with explosives
- High pressure water jetting or grit blasting
- Pressure testing
- Breaking into pipelines/hoses containing residual pressure or combustible liquids
- Isolating electrical or mechanical machinery to allow maintenance or repair (complemented by Electrical or Mechanical Checklist)
- Working at height i.e. any position where the potential exists for a person to have a fall likely to cause a personal injury
- Removing protection systems (e.g. machinery guards)
- Any work that directly affects critical safety systems
- Entering into confined spaces or places where the atmosphere is suspect (complemented by Confined Space Checklist)
- Spray painting or using chemicals in closed or confined spaces
- Activities involving radioactive sources such as non-destructive testing

Work may need to be carried out by specialists with specific training or qualifications and require dedicated supervision at all times. Only people who have completed PTW training and are designated as the Person in Charge are allowed to raise a PTW.

17. HSE department roles

Subsea 7's businesses and operations have HSE departments with responsibility for guiding the implementation of HSE policies. They also measure safety performance against specific HSE improvement action plans. They provide independent audits of worksites to measure the effectiveness of the systems so that they can provide advice and assistance to improve safety performance. When incidents occur, Subsea 7's HSE departments co-ordinate the analysis of all incidents, damage and injury events and provide investigative services for the more serious events including near miss incidents with a high potential outcome. Investigation findings are used to provide a basis for continuous improvement to our procedures and processes.

18. Safety representatives/delegates

Subsea 7 encourages the participation of all our people in promoting safe working practices throughout our operations. Forums are held regularly for you and your colleagues to discuss issues of concern and make proposals to improve HSE performance.

Worksites nominate worker safety representatives/delegates to act on behalf of peer groups at HSE meetings. These representatives/delegates are identified clearly in the work areas. We encourage you to be a safety champion and volunteer.

19. Communication

Subsea 7 encourages you to bring HSE issues to the attention of any of the following:

- Your immediate supervisor
- Your worksite manager
- A member of the worksite safety committee
- An elected safety delegate
- A member of a team involved in hazard identification and risk assessment exercises
- Your team when participating in a toolbox talk
- The person carrying out the task

Subsea 7's Senior Managers regularly visit worksites to enquire about HSE concerns. These visits provide an opportunity for you to speak to them as they are interested in hearing your ideas on how safety performance can be improved. Safety communication is a two-way process; so if you speak to a manager about safety concerns, Subsea 7 will respond – to let you know what action is being taken or to explain why action will not be taken. Managers have a duty to respond to you in a timely manner with their findings and actions.

If you find it difficult to raise your safety issue with any of the people listed above, or feel your concern has not been fairly addressed, you may contact the supporting HSE Manager or the VP HSEQ.

Toolbox Talks

Toolbox talks provide the forum for the Supervisor or the 'Person In Charge' of Work Team to ensure that everyone involved in the activity fully understands the tasks, hazards involved, hazard control measures to be employed and; procedures to be followed.

All work groups will hold a daily toolbox meeting at the beginning of each shift to discuss the planned scope of work for that day. Additional toolbox meetings should be held as required throughout the shift i.e. if there are significant changes to the task, people involved or environment conditions. The attendees at a toolbox meeting and any other relevant information shall be formally recorded on Toolbox Talk Form (FO-GL-HSE-016).

Worksite management representatives and engineers will periodically attend the toolbox meetings to monitor their effectiveness and obtain feedback on work related HSE issues.

Time Out for Safety

'Time Out for Safety' empowers individual workers, supervisors and managers who perceive that there is a potential hazard associated with a task to stop the work and take time out for safety without the fear of negative consequences.

Time Out for Safety may also be used by supervisors and team leaders to hold a short discussion with their work teams to focus on a HSEQ related topic of interest i.e. a recent incident or near miss, a received safety alert or information bulletin, a lesson learned, etc.

Some examples of when a Time Out for Safety might be called are:

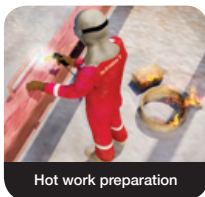
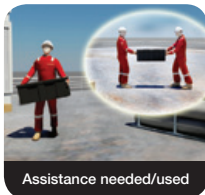
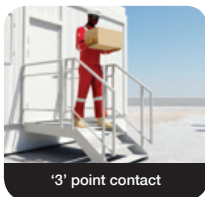
- A change of plan, or to pass on urgent information critical to the job in Management of Change
- An unscheduled event, or the emergence of a previously unidentified risk or hazard
- Incomplete understanding of instructions, procedures or ongoing activities
- To discuss relevant incidents' or near miss, safety alert
- A need to ask for help or direction
- As a means to focus on a particularly hazardous task or condition

20. Critical safety behaviours

Over 90% of injuries are caused by 'at risk' behaviours.

The following safety behaviours when inadequate or lacking ('at risk') have been identified as the key causes of Subsea 7 injuries:

Critical safety behaviours



Health, Safety, Environment and Security



Line of fire



Use of tools and equipment



Pinch points



Correct PPE worn



Use of barriers and warnings



Walking/working surfaces



Pre-job planning



Immediate report of injury



Eyes on task



Lock out tag out system



Conformance to safety rules,
procedures or policies

A behaviour
is an
observable
act

21. HSEQ observation and intervention

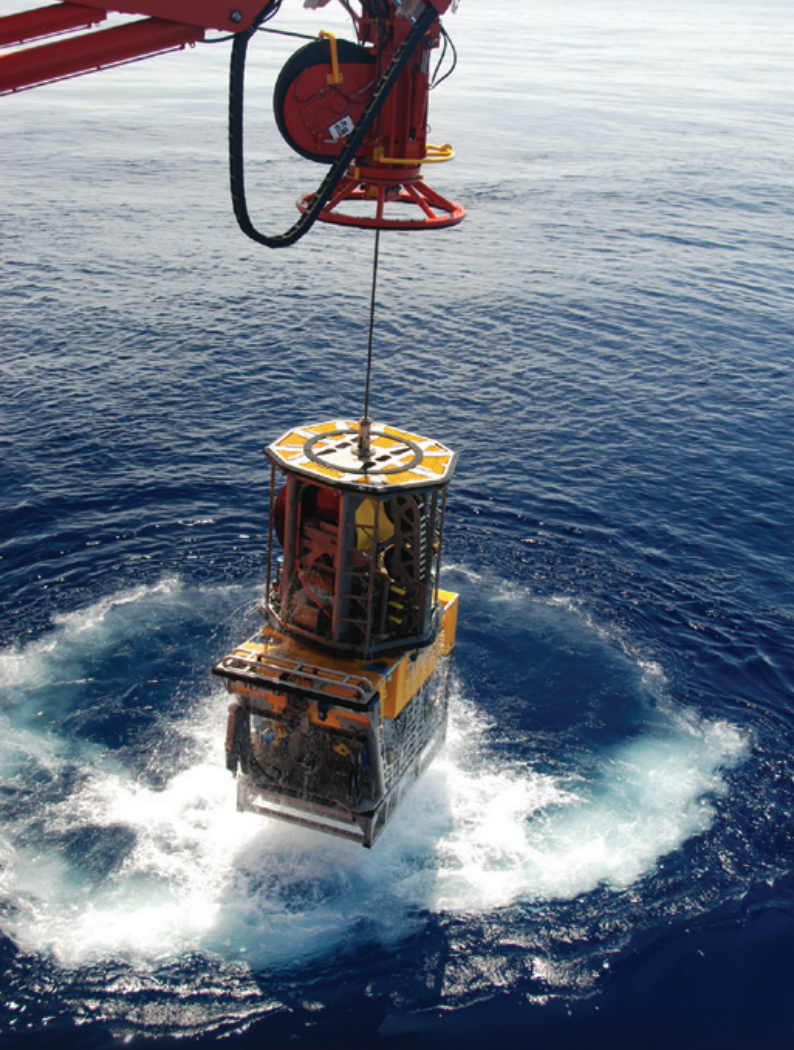
Everyone has a part to play in managing safety. You are responsible for looking after your own safety and the safety of those around you. By keeping alert you can help to eliminate at-risk behaviours, correct unsafe conditions and contribute to safety at your worksite.

If you see something that looks unsafe, or an at-risk behaviour, approach co-workers and discuss it using questions. Then either stop it, correct it or bring it to the attention of somebody who can stop it and correct it. You should also recognise and comment on safe behaviour.

Fill out an **OBSERVATION** card to share the information, prevent re-occurrence and help improve Subsea 7 worksites. Likewise you should report and recognise notably safe behaviour. The system is used to highlight behaviours, quality, environmental events and worksite conditions. Fill out an **INTERVENTION** card if you have had a conversation that questioned an 'at-risk' behaviour or supported an example of safe behaviour.

The reporting of these observations and interventions will reveal if there are common trends that we can address through training or other corrective action.





22. Incident reporting and investigation

Incidents are actual events which do or could cause harm. They include injury, illness, damage and near miss incidents. They are events that Subsea 7 wants to prevent.

If an incident does occur, it is essential that it is properly reported so that managers can investigate and take the necessary actions to prevent recurrence.

All incidents are recorded in the Synergi 'case' database. You may have to contribute to a report if you are injured or involved in an accident; please remember, the report should only contain facts (do not include your opinions or make unsubstantiated claims). The events will be investigated either by the worksite manager or a special investigative team, depending on the severity of the event.

Please remember to report all undesired events and injuries promptly.

Incident reporting in Synergi:

The screenshot shows the 'HSE - Incident' reporting form in the Synergi system. The interface has a blue header with the 'subsea 7' logo and navigation tabs: 'Case', 'Standard Reports', 'Favourite Reports', 'Tools', and 'HELP'. On the left is a sidebar with links: 'Create New Case', 'Create New Search' (with a search bar and 'GO' button), 'My Open Cases', and 'My Open Actions'. The main form area is titled 'HSE - Incident' and contains four tabs: 'Facts', 'Classification', 'Causes', and 'Action'. The 'Facts' tab is active, showing a breadcrumb trail: 'Where and What > Who > Connected Cases > Case Log'. The form fields include: 'Date (dd/MM/yyyy)' and 'Time (H:MM)' (both with calendar icons), 'Case Categorisation', 'Territory Responsible' (with a dropdown arrow), 'Location', 'Area on site/vessel', 'Brief Description', and 'Incident Description' (all with text input fields and small icons on the right). At the bottom are 'Project Manager/Contact Person', 'Work Process', 'Client/Project', and 'Responsible Unit' (all with text input fields and small icons on the right).

Near miss incident

This is an event which could have resulted in damage or injury. An incident actually happened but no damage or injury was sustained. Near miss reporting is required in order to communicate the lessons learned and prevent future incidents and accidents.

Damage

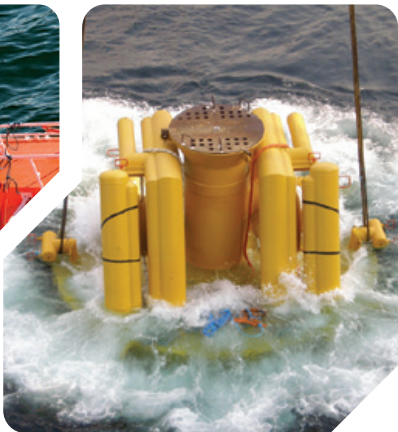
Damage to materials, property or equipment, or where harm is caused to the environment are included in this class. Damage specifically caused by fire or explosion is also identified.

Injury

Describes events in which people have sustained an injury. Most sites will have trained First Aiders available. In the case of the larger ships, barges or yards, a Medic or Doctor will be available on site to treat the injured person. The medic or doctor will categorise the 'injury'.

Illness

This category is used for reporting illnesses.



Examples: Safety observation



(Near miss) incident



Damage



Material - Load released when wire broke and the load was damaged.

Injury



Lost Time Injury (LTI) injury caused when load swung and struck a person resulting in them being unfit for work for the next shift or longer.

23. Personal Protective Equipment (PPE)

The planning and assessment of work activities will take account of any hazards and where practicable, the risk from these hazards will be eliminated or reduced. A residual risk may remain, but we can often reduce this further by wearing appropriate PPE. It is Subsea 7's policy to ensure that suitable PPE is available to everybody and always used in work activities.

Your full compliance with safe, well proven working procedures should prevent accidents and consequential injuries. PPE is the last personal line of defence, but may not protect you if you fail to behave safely.

Every person on a worksite must wear (unless in a designated safe zone):

- Hard-hat
- Coveralls with high visibility reflective stripes or a high visibility tabard
- Safety boots/shoes
- Safety glasses
- Gloves (unless deemed unfit for task)

Additional PPE must be used when required and may include:

- Hearing protection
- Fall protection harnesses
- Respiratory protection equipment
- Lifejackets (offshore applications including in harbour use)
- Burning goggles or clear goggles
- Gloves with specific hand protection (cut/thermal/chemical)
- Welding hood
- Full face shield





24. Emergency situations

During your worksite induction you will be informed about the alarms used at your workplace and the specific procedures that you must follow in case of fire or other emergency situations. When an alarm is raised, stop work, make your work place safe and go immediately to your designated muster station/ assembly point.

If you discover a fire, raise the alarm immediately. Attempt to extinguish the fire only if you are familiar with the fire fighting equipment and are sure you will not endanger your own life.

Ensure that during your induction you learn where to go for medical assistance.



25. Harmful substances

Every worksite, which uses any chemicals, must:

- Review the chemicals, which you use on a regular basis and ensure that you are familiar with the associated hazards and personal protection measures. Be familiar with the Material Safety Data Sheets (MSDS) and the assessments for the safe use of chemicals.
- Follow all instructions related to safe use and storage of chemicals
- Understand spill cleanup procedures and know where spill response equipment is stored.
- Prior to using hazardous chemical substances, instructions for their use and precautions to be taken must be fully understood and when applicable, identified on the Permit to Work. Detailed information is available to site management through SYPOL on hazardous substance management.

COSHH - Do you know all you need to know ?

Under COSHH or the Control of Substances Hazardous to Health Regulations 2002, all persons at work need to know the safety precautions to take so as not to endanger themselves or others through exposure to substances hazardous to health. Below are four general classifications of risk - know the appropriate symbols, their meaning and their safety precautions.

Meaning	Safety Precautions
Toxic / Very Toxic Substances and preparations which cause death or injury or serious damage to health when inhaled, swallowed or absorbed on the skin. 	1. Wear suitable protective clothing, gloves and eye / face protection. 2. After contact with skin, wash immediately with plenty of water. 3. In case of contact with eyes, rinse immediately with plenty of water and seek medical advice. 4. In case of accident or if you feel unwell, seek medical advice immediately.
Corrosive Substances and preparations which may on contact with skin, destroy, burn or irritate. 	1. Wear suitable gloves and eye / face protection. 2. Avoid contact with skin. 3. In case of contact with skin, wash immediately with plenty of water. 4. In case of contact with eyes, rinse immediately (for 15 minutes) with plenty of water and seek medical advice.
Harmful Substances and preparations which may cause death or injury or serious damage to health when inhaled, swallowed or absorbed on the skin. 	1. Do not breathe vapour / fumes / dust. 2. Avoid contact with skin. 3. Wash thoroughly before you eat, drink or smoke. 4. In case of contact with eyes, rinse immediately with plenty of water and seek medical advice.
Irritant Non-corrosive substances and preparations which, through immediate or repeated contact with the skin or mucous membranes, may cause inflammation. 	1. In case of contact with eyes, rinse immediately with plenty of water and seek medical advice. 2. In case of contact with skin, rinse immediately with plenty of water. 3. Do not breathe vapour / fumes / dust. 4. Avoid contact with skin.

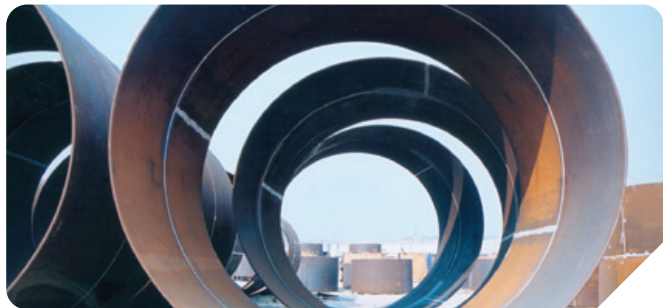


26. Lifting operations

Much of Subsea 7's work involves lifting operations using cranes or other lifting equipment. Subsea 7 has developed very specific rules covering the use and maintenance of such equipment. Many lifting operations are subject to detailed planning risk assessment and the implementation of approved lift plans.

Some of the key issues in these rules are:

- Never work under a suspended load
- You must be adequately trained and authorised before you can operate cranes, winches, fork lifts, jacks and any other lifting equipment
- Anyone using lifting equipment and/or rigging must be sure prior to use that it is fit for purpose, has up to date certification showing that it has successfully passed a test of its lifting capability. They must also ensure that they understand and confirm with their supervisor the colour code system for in-date lifting and rigging equipment
- The route for a lift must be clear of people and obstructions
- Equipment used for lifting people must be designed and certified and marked for this purpose
- Check that equipment required for lifting people is marked 'man-riding'
- Never use a people transfer basket to carry more than the stated number of people
- Ensure that you understand and follow the lift plan



27. Manual handling

The first consideration: can manual handling be avoided?

All manual handling tasks must be assessed. Stop and think.

- Is the task repetitive?
- Will it take more than an easy effort to lift it or is it above the limits on the next page?
- Do I have to push or pull?
- Does this involve more than one person?

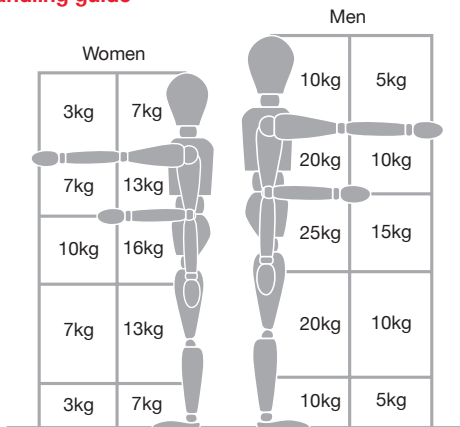
If the answer is yes to any of these, a manual handling assessment should be carried out to mitigate the risk of injury.

The most effective control to reduce injury or incidents from manual handling is not to perform the manual handling in the first instance.

Is it too heavy? Get help or use a mechanical device.



Manual handling guide



Lift with your legs - not your back



Keep the load close to the waist



Avoid twisting the back and leaning



Keep the head up when handling. Move smoothly. Don't lift or handle more than can be easily managed.



Put down then adjust



Lifting in teams

28. Working at height

Working at height should be considered as a last option when deciding how a work task should be carried out and may require a permit to work. Working at height should only be undertaken if the task is essential and alternative means of completing the task have been fully considered. Refer to the Working at Height Procedure when assessing the work.

Working at height can be defined as **‘Any position where the potential exists for a person to have a fall likely to cause a personal injury’**.

There is no minimum height where the risks should not be considered and assessed. We should remember that 60% of serious injuries sustained due to industrial falls are from a height of less than 2 metres.

The only occasion where a fall protection system may not be used is when a greater hazard exists after implementing fall protection measures. The residual risk must then still be assessed as acceptable to carry out the work.

You must receive working at height training before doing tasks that require it.

All scaffolding must be certified and inspected daily by a qualified person.



29. Slips, trips, falls and hand injuries

Take care to avoid slips, trips and falls and be aware that the main factors contributing to slip, trip or fall accidents are:

- Failure to maintain three point contact behaviour
- Eyes not on path behaviour
- Unsuitable footwear
- Environmental factors – wind, rain, spray
- Unsuitable or poor quality flooring
- People - congestion
- Contamination – oil, paint, grease
- Obstacles and obstructions
- Poor housekeeping and maintenance



The most common type of injury at worksites is to people's hands and fingers. In order to reduce these injuries we must:

- Avoid pinch points behaviour
- Keep eyes on task
- Use the correct PPE for our hands
- Be more aware of potential hazards to our hands
- Look out for our colleagues and warn of unseen danger
- Work using good practice and with the right tools
- Be familiar with the Risk Assessment hazards and controls and relevant procedures

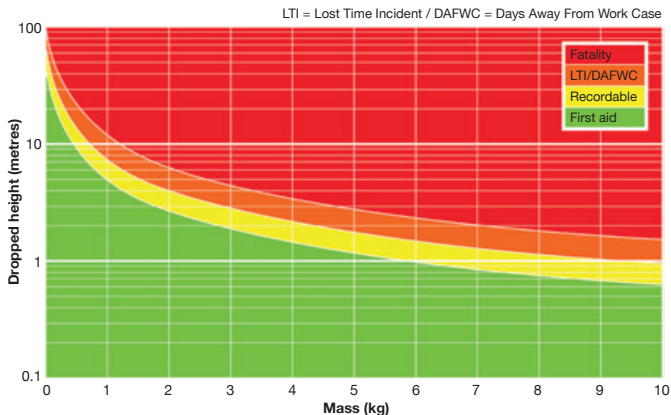
Hand critical safety behaviours



30. Dropped objects

Dropped objects have proved to be the third highest cause of fatalities and serious injuries in the oil and gas industry.

DROPS Calculator



Tips

In addition to the working at height guidance, remember these simple tips:

- Use lanyards on tools
- Secure loose objects that can fall
- Maintain good housekeeping



31. What to do in the event of an accident

In the event of an accident act in this order:

1. Secure the site - make sure it is safe
2. Raise the alarm
3. Bring First Aider to the injured person if safe to do so



For a list of resources and contacts please visit:

7ONLINE>Functions>HSE

Should you have any questions relating to the content of this handbook or HSE in general please ask your Supervisor. A soft copy of this handbook is available on the Management System.

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