

Questworks Health Safety Security and Environment (HSSE) Corporate Policy

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Policy Statement

At Questworks the health, safety and security of all people, together with a strong respect for the environment, is of utmost importance. We recognize that safe, secure and environmentally sound operations are the key to our success, and our culture is such that we continually strive to improve our HSSE performance through constant care. We have the ambition to be a high performing EPC company, known and recognized for our ability to consistently deliver a high HSSE performance. We believe in incident-free operations and acknowledge that achieving this requires HSSE to be an integral part of how we do business. Furthermore, based on our shared values, we recognize that an open, trusting and just culture is fundamental, where new ideas are welcomed and people feel empowered to express themselves on HSSE issues. We all have a role to play. It is the responsibility of management lead by example. Achieving our ambition requires commitment from the whole organization. We all need to actively consider the HSSE implications of our activities and make HSSE a top priority at all times.

It is the policy of Questworks to conduct its business in a manner that:

- Avoids harm to people
- Protects the environment
- Meets or exceeds all applicable regulatory and contractual requirements, and where these do not exist apply responsible standards
- Promotes a high performing HSSE culture throughout the organization
- Ensures continual improvement of HSSE performance

In following this policy, Questworks and its subsidiaries will:

- Manage HSSE matters as an integrated part of their business, through the framework for effective HSSE management and the setting of appropriate objectives and targets
- Communicate the HSSE policy to all employees and other relevant parties
- Ensure the motivation and commitment of all employees through appropriate training, appraisal and recognition
- Require contractors to manage HSSE in line with this policy



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Managing Director, Questworks

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1. The HSSE Management Model

The Questworks HSSE management model comprises of eight key elements

- A. Policy and Objectives
- B. Leadership, Commitment and Accountability
- C. Organization, Responsibilities and Documentation
- D. Evaluation and Risk Management
- E. Planning and Implementation
- F. Communication and Information
- G. Monitoring and Corrective Action
- H. Auditing and Management Review

2. Policy and Objectives

Questworks management is responsible for defining and documenting HSSE policy and objectives. The HSSE policy shall prevail in all company engagements except where adjustments are warranted by unique circumstances. The management will also review and continually improve the HSSE policy on an annual basis.

The HSSE policy and objectives shall be implemented and communicated throughout the organization. An annual HSSE programme that outlines targets, objectives, HSSE initiatives and audits for the coming year will be published.

3. Leadership, Commitment and Accountability

Questworks will provide strong, visible leadership and ensure that the necessary resources are available to manage health, safety, security and environmental issues in line with this policy. HSSE is every individual's responsibility. All employees are accountable for the HSSE performance within their area of responsibility.

4. Organization, Responsibilities and Competency

The organizational structure, roles, responsibilities and interrelations necessary to implement effective HSSE management at every level shall be documented, communicated and reviewed regularly.

I. HSSE Manager

The HSSE manager is responsible for implementing HSSE and managing HSSE critical activities at the organization level.

II. Project Managers

Project managers are responsible for implementing HSSE and managing HSSE critical activities in their specific projects.

III. Onsite HSSE Representative

An onsite HSSE representative shall be assigned to coordinate the arrangements for effective HSSE management within site. The representative shall report to HSSE Manager.

IV. Competence and Training

Personnel performing HSSE critical activities shall be appropriately trained and competent, and have the necessary authority and resources to perform the allocated function. HSSE critical activities are those identified through appropriate risk assessment processes.

V. Partnerships

In forming supplier partnerships, an evaluation of the supplier's HSSE performance and management shall be undertaken by the HSSE Manager. This is to ensure they are compatible with the company's HSSE policy.

VI. Governmental and Legal Requirements

It is the responsibility of the HSSE Manager and the Project Manager to ensure that Questworks complies with both statutory and contractual HSSE requirements.

VII. Documentation and its Control

The HSSE Manager shall take custody of the following documentation:

- HSSE policy, objectives and targets
- Arrangements for effective HSSE management
- Roles and responsibilities of all relevant personnel
- Training and competency assessment of personnel involved in HSSE critical activities
- Results of HSSE risk evaluations, audits and management reviews
- Procedures and work instructions for HSSE critical activities
- Emergency response plans

Documents that detail the arrangements for effective HSSE management shall be controlled to ensure that:

- They are identified in relation to functionality
- They are periodically reviewed, revised as necessary and approved prior to issue
- Current versions are available where needed
- Obsolete versions are promptly removed from all points of issue and use

5. Evaluation and Risk Management

I. Identification of Hazards

The HSSE Manager and Project Manager shall systematically identify hazards that may affect, or arise from its activities or from materials used. All activities, from inception through to completion and disposal, shall be assessed beforehand to predict and mitigate significant hazards.

The identification process shall include consideration of incidents and potential emergency situations, including those arising from civil works, electrical & mechanical works.

II. General Evaluations

The potential risks and effects from identified hazards shall be evaluated, taking account of probabilities of occurrence and severity of consequences, for:

- People
- The environment
- Assets

The HSSE Manager shall maintain records of statutory requirements and codes applicable to the HSSE aspects of its operations and shall ensure that the risk evaluations performed comply with these requirements.

III. Health and Safety Evaluations

Evaluation of health and safety risks and effects shall include consideration of:

- Fire and explosion.
- Mechanical and structural failure.
- Chronic and acute exposure to chemical or physical agents.

IV. Environmental Evaluations

In order to evaluate the environmental impact of a project, an environmental impact assessment shall be conducted for relevant activities and will take consideration of:

- Generation and disposal of wastes
- Use of water, and other natural resources
- Noise, dust and vibrations

The results of these evaluations, where relevant, shall be incorporated into project planning.

V. Risk Reduction Measures

Risk reduction measures shall be identified and assessed and, where appropriate, implemented to reduce risks and effects to a level deemed as low as reasonably practicable. Risk reduction measures shall include

both those to prevent incidents and to mitigate chronic and acute effects. Mitigation measures shall include steps to prevent escalation of developing abnormal situations and to lessen adverse effects on health, safety, security and the environment and ultimately emergency response measures.

When planning how hazards are to be controlled and risks reduced, the following control hierarchy is to be used:

- Elimination/avoidance of the hazard
- Substitution with a lesser hazard
- Engineering controls: for example design changes or equipment changes
- Administrative controls: for example training
- Personal protective equipment

Pre-startup reviews shall be conducted on all projects prior to operation.

VI. Risk Management System

The HSSE Manager will spearhead and take responsibility for the implementation of a corporate risk management system.

Planning and Implementation

I. General

The overall project delivery plan shall include specific plans for addressing HSSE concerns. These plans shall include:

- A clear description of the objectives and targets
- The means by which they are to be achieved
- Time scales for implementation
- Programs for motivating and encouraging personnel towards a HSSE aware culture
- Mechanisms for encouraging input from, and providing feedback to personnel on HSSE performance
- Processes to recognize good individual and team HSSE performance
- Mechanism for evaluation and follow-up

II. Machinery & Equipment Integrity

The HSSE Manager shall ensure that HSSE critical equipment for example lifting equipment shall be regularly inspected by qualified personnel.

III. Management System

A management system comprising of HSSE procedures, technical standards, work instructions and guidelines shall be consolidated and documented for all critical project activities. This documentation shall be communicated and be readily accessible to all relevant personnel.

The management system shall specifically include:

- Necessary and concise contractual HSSE information relating to the project
- Statutory and professional HSSE standards relating to the project
- Procedures of carrying out critical HSSE activities
- Individuals responsible for preparing relevant documentation and populating the HSSE management system

IV. Management of Change

The HSSE Manager shall implement a formalized procedure ensuring that changes to people, equipment and processes are planned and controlled to avoid adverse HSSE consequences.

V. Contingency and Emergency Planning

The HSSE and Project Managers shall maintain emergency response plans, and communicate these plans to all relevant employees and third parties.

Emergency response plans shall cover:

- The organization responsibilities and procedures for emergency response and disaster control, including the setting up of an Emergency Response committee
- Systems and procedures for providing personnel evacuation, rescue and medical treatment
- Procedures for handling relatives and others that may arrive at company's offices, hospitals or other designated arrival points
- Readiness of emergency response teams
- Periodic requirement assessment of adequacy of emergency equipment

6. Communication and Information

HSSE expectations in line with the HSSE policy, shall be communicated clearly at all levels in Questworks.

All employees and partners shall be made aware of the:

- Importance of compliance with the HSSE policy and their individual & collective roles in achieving it
- Potential consequences of non-compliance
- HSSE risks of their work activities

Monitoring and Corrective Action

7. Monitoring and Corrective Action

HSSE performance shall be both actively and reactively monitored. The HSSE Manager shall maintain records that document the extent of compliance with its HSSE policy. Subsequently, the HSSE Manager shall prepare an annual report covering the HSSE performance.

Non-compliances with the requirements of the HSSE policy shall be investigated and corrective action considered and implemented. Incidents that affect, or could have affected, the HSSE performance shall be investigated and appropriate actions taken.

8. Auditing and Management Review

The HSSE Manager shall conduct periodic audits relating to HSSE implementation and control. Corporate management reviews will be held on a bi-annual basis, headed by the Questworks CEO or, in his absence, by the nominated representative. The findings from the audits will be documented and resolved within a set time.