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| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

1. INTRODUCTION

The purpose of Fluenta's Health, Safety & Environment (HS&E) Management System Manual is to describe the overall HS&E standards and goals in Fluenta. This manual, along with Fluenta's HS&E related policies, procedures and guidelines is defined as Fluenta's Health, Safety and Environment Management System (HS&E Management System).

Fluenta's HS&E Management System is established to provide an effective system to manage the Health and Safety aspects in all our work. Fluenta's HS&E Management System is applicable to all parts of Fluenta worldwide (any deviations will be described separately).

The development, control and implementation of the HS&E Management system is administered by Fluenta's Corporate QA/HS&E function, while practical implementation is a Line Management responsibility.

1.1 General HS&E Principles

This HS&E Management Manual incorporates four essential general principles of Health, Safety & Environment. These principles are:

- Practice Safety
- Be Concerned About the Safety of Others
- Prevent Accidents
- Prepare and respond to emergencies

1.1.1 Practice Safety


Practicing safety may mean different things to personnel, and it is the purpose of this manual to define a standard for safe work practices in Fluenta. Practicing safety means integrating safety into the daily work activities by doing something the right way, without hazardous shortcuts.

1.1.2 Be Concerned About the Safety of Others

Concern for safety must include alerting others in the area in the event of an accident or emergency, as well as addressing unsafe behaviours. This may consist of reminding a colleague to wear safety glasses or performance of a risk assessment when required, etc. Everyone is responsible for reporting hazards and hazardous conditions in accordance to described procedures.

1.1.3 Prevent Accidents

Prevention is the key to safety. Prior to beginning any project, using any piece of equipment, or handling materials, it is essential that the potential hazards and safety precautions necessary to perform the work be considered. Hazards may include exposure to toxic substances, mechanical equipment, waste chemicals, etc. Refer to Chapter 6-Risk Assessment.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

1.1.4 Prepare and respond to Emergencies

Everyone must be prepared to respond quickly and effectively in an emergency situation. Be familiar with the work area, emergency plans (including available exits, fire extinguishers, first aid kits, alarm buttons, etc). Just a few moments spent in training and learning the locations and use of these pieces of equipment prior to an emergency could save a life. It is also important for all personnel to be familiar with the emergency preparedness and response chapter (Chapter 7) in this manual.

1.2 Structure of the HS&E Management system

1.2.1 Health, Safety & Environmental Policy

The Health, Safety and Environment Policy is the highest level document in the HS&E document hierarchy, this document describes the overall HS&E Management statement from the Executive Management in Fluenta.

1.2.2 Health, Safety & Environmental Management Manual


The Health, Safety and Environment (HS&E) Management manual describe the overall functionality and requirements of the HS&E Management system in Fluenta:

- How the HS&E function is structured in Fluenta.
- Description of the HS&E organisation and responsibilities.
- How Internal/external HS&E requirements shall be reflected in the organisation.
- How to identify and control risk.
- Etc.

This manual is a corporate manual, which means that it is applicable for all parts of the Fluenta organisation worldwide. The HS&E Management manual will refer to relevant procedures in the Corporate Procedures manual, under the HS&E section. Fluenta's Emergency Preparedness and Response program is also described within this manual (Chapter 7). Region specific procedures will be described in 1.2.4.

1.2.3 General HS&E procedures and Guidelines

The HS&E Management System includes general HS&E procedures and guidelines to be followed on all Fluenta's worksites (e.g. Procedure for handling of incident/accidents, Risk Analysis Procedure, Procedure for Safety delegates/representatives, Work Environment related procedures, guidelines for first aid, etc). In addition to the corporate procedures, the Business Lines/projects shall establish procedures/manuals as necessary to ensure safe operations. These operational or technical procedures/ manuals shall be reviewed by the QHS&E Department before they are issued for use in accordance with established procedures.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

1.2.4 Region specific procedures and Guidelines

Due to different statutory requirements from region to region, each location needs to evaluate these requirements and compare them with Fluenta's HS&E Management System. If some of the local requirements are not described in the HS&E Management manual, this shall be brought up with the QA/HS&E Manager and required procedures and guidelines shall be prepared with guidance from the QA/HS&E Manager.

1.2.5. Preparation

The QA/HS&E Manager is responsible for the development and maintenance of this manual. All subsequent revisions of the manual shall be approved by the Managing Director.

1.2.5.1 Registration and distribution

The complete QA/HS&E Management system will be delivered to all Fluenta staff. The QA/HS&E Manager is responsible for maintenance of the system.

1.2.5.2 Revisions

Prospective new revisions of the manual will be issued to holders of controlled copies


1.3 Organisation and responsibility

The purpose of this section is to provide an overview of how HS&E is organised and controlled, including a description of general responsibilities of different level of personnel.

1.3.1 Managing Director (MD)

Managing Director has the ultimate overall responsibility for the development, implementation and effectiveness of the HS&E Management system in Fluenta. The MD shall ensure that the HS&E policy is implemented and communicated to all employees.

1. Communicating and demonstrating a positive attitude to HS&E.
2. Approval of the necessary resources to maintain and improve HS&E in the respective organisation.
3. Assuring that safety is never compromised.
4. Responsible for safe and efficient operations including the following activities:
 - Review of procedures and HS&E related documentation applicable to Fluenta.
 - Implementing Safety policies and procedures worldwide within their organisation.
 - Assisting with the investigation of incidents as required.
 - Ensuring their organisation is operated in accordance with applicable regulatory safety requirements.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

1.3.2 Regional F&A Managers

The Regional F&A Managers are responsible for local administrative support for facilitation of HS&E policies, procedures, routines, and sound practices. The Regional F&A Managers report directly to the MD's on matters of HS&E.

1.3.3 QA/HS&E Manager

The QA/HS&E Manager is responsible to:


- Develop and maintain the overall HS&E Management system in Fluenta.
- Co-ordinate HS&E related audits at Fluenta's facilities, against requirements laid down in the HS&E Management System (including local laws and regulations).
- Facilitating the development, implementation and maintenance of HS&E policies, procedures, routines and sound practices in the three Business Lines in cooperation with the MD's.
- Plan, conduct and report HS&E audits both internal and in the regions.
- Prepare and maintain the overall emergency response routines.
- Coordinate the HS&E work for the individual QA/HS&E Coordinators.
- Perform HS&E inspections and audits at a project level.
- Follow up client requirements and subcontractor HS&E systems when required.
- Follow-up accidents/incidents at a project level.
- Propose improvements and participate in the development and maintenance of safety related documentation, equipment and routines.
- Advise the Line Management regarding HS&E issues, and give support regarding Fluenta's QA / HS&E Management System.

The QA/HS&E Manager reports directly to the MD.

1.3.4 Safety Delegates/Representative

All Fluenta facilities shall have dedicated Safety Delegate(s)/Representative(s). Safety Delegate(s)/Representative (s) duties will be to:

- safeguard the interests of employees in matters relating to the working environment.
- ensure that the work is carried out in such a manner that the safety, health and welfare of the employees are safeguarded in accordance with local laws and regulations.
- ensure that employees are not exposed to hazards from machinery, chemical substances or work processes, etc.
- ensure that safety devices and personal protective equipment are provided in adequate numbers, that they are readily accessible and in proper condition,
- ensure that work is arranged so that the employees can carry out their daily work in a proper manner with regard to health and safety.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

- be consulted during the planning and effectuation of measures of significance for the working environment within the representative's safety area.
- be informed of all occupational diseases, occupational accidents and near accidents in his or her area, of reports relating to occupational health inspections and measurements and of any faults or defects detected.
- Familiarize him/her with existing safety rules, directives, orders and recommendations issued by the Local Labour Inspection Authority or the employer.
- Participate in the inspection visits of the establishment undertaken by the Local Labour Inspection Authority.

Safety Delegates report directly to their Line Managers and functionally to the QA/HS&E Manager.

1.3.5 All Employees

To promote an accident and incident-free working environment and reduce the risk to health and external environment, all Fluenta's employees shall be made aware of their responsibilities and the arrangements provided to ensure their safety, health and welfare and protection of the environment.

Each employee has a duty to perform his or her duties in a safe and responsible manner in accordance with the direction and guidance of Fluenta's Health, Safety and Environmental Management System.

It shall be the intention of all employees to work in a safe and correct manner and maintain the working area in a safe condition, free from hazards and risks to health and environment. Fluenta shall make employees aware of safe working practices and procedures within the onshore and offshore working environment, e.g. housekeeping rules, emergency procedures and protection of the environment, etc.


1.3.6 Local HS&E related functions/Committees

Each location shall also establish HS&E related functions/Committees required by local laws and regulations. (e.g. in Norway: Working Environment Committee (AMU), Safety Delegate system, etc.)

1.4 Employee involvement

To achieve a good safety culture within Fluenta, a number of issues need to be in place. These will include activities at different levels in the whole organisation:

- Annual HS&E related goals, action plans
- HS&E inspections/Audits
- Corrective Action Development & Implementation
- Incident Reporting and Investigation
- Inductions for new personnel
- Risk analysis (Job Safety Analysis, HAZOP's, etc.)
- Procedure Development and Review.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

- Safety Delegates/Representatives
- Pre-job Meetings, etc.
- Training
- Safety Meetings
- Etc.

1.4.1 HS&E Communication

Safety Information will be communicated between Head office and all Fluenta facilities on a regular basis.

- HS&E statistics will be presented monthly through Intranet.
- Relevant safety related information will be distributed through Intranet frequently.
- Working Environment Surveys will be presented through Intranet
- Safety Alerts will be developed and distributed to all facilities when required.
- Safety campaigns will be distributed to all facilities frequently.
- Fluenta will on a frequently basis distribute injury analysis to all facilities to present trends, etc.

1.4.2 Safety meetings

Good communication is necessary in achieving effective health and safety management. Regular meetings at all locations play a significant part in the communication process. Such meetings should take place both informally and within a structured agenda, and all relevant personnel are required to participate in the process.


The main objectives of the meetings are to:

- Seek methods to eliminate unsafe practices and conditions.
- Distribute safety information to employees.
- Obtain views and encourage positive contributions from employees.
- Increase health and safety awareness and obtain commitment to HS&E Management System.
- Resolve any outstanding safety issues or concerns with employees.
- Promote the Safety Management System.

Items should either be resolved at the meeting or 'passed to the appropriate Line Manager for action. Feedback on actions should be given as soon as possible to encourage people to remain motivated.

Typical meetings held include:

- Pre-Job meetings
- Monthly Management meetings
- Safety Meetings with clients
- On-/Offshore Safety meeting

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

1.5 Policy and objectives

1.5.1 HS&E Policy

Fluenta has established an overall HS&E policy, which is the governing document in our HS&E Management system:

HEALTH, SAFETY AND ENVIRONMENT POLICY

It is a primary aim for Fluenta to avoid injuries, incident and accident of any kind, to promote a positive working environment for all its employees, and to conduct its business without putting the health of personnel at risk.

Fluenta recognises its responsibility to provide safe working conditions at the company's facilities and customer premises.

To achieve this, the personnel themselves must accept the individual responsibility to protect themselves, their colleagues and the working environment.

Fluenta will protect its properties, operations, interests and personnel against injuries and loss as far as is reasonably practicable.

Fluenta will conduct its business in accordance with applicable rules and regulations concerning the protection of the environment.


1.5.2 HS&E Goals

To increase the quality and the grade of efficiency of the HS&E Management system, Fluenta has established HS&E related goals. These goals are corporate, and shall be applicable worldwide.

1.5.2.1 Overall Goals

The overall HS&E goal for Fluenta is to establish, implement and maintain an HS&E management system, which ensures that:

- All types of accidents will be avoided at any time.
- All work shall be performed with safety, health and environment as first priority.
- All employees are properly informed about their responsibilities for health, safety and environmental matters.
- Good waste management practices are established.
- Good working environments will be strived for.
- Fluenta's property, products and information are secure.
- All activities are in accordance with existing applicable laws and regulations (including Fluenta's HS&E rules and procedures).

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

- An effective system for monitoring and reviewing health, safety and environmental matters and performance is maintained.
- The external environment is protected against pollution.
- Procedures for effective response to any emergency that may occur, are provided and maintained.
- Training, instruction, information and supervision for all employees are provided to enable them to work safely and avoid damage to the external environment.

1.5.2.2 Annual HS&E Goals

Fluenta will prepare annual Corporate HS&E related Goals to continually improve the HS&E Management system. These goals will be approved by Fluenta's MD, and will be based on the following:

- Findings from surveys.
- Chronic problems and issues.
- Findings from trends in our incident reporting system.
- Identified hazards, risks and environmental exposures.
- Input from business lines.
- Etc.

Based on the annual HS&E goals, an action plan shall be prepared as a tool to follow up annual goals. This plan shall include the following headings:


- Item number.
- Goals (description of each individual goal).
- Actions (a description of activities to achieve the goal).
- Responsible (name/title of responsible person).
- References (References to regulations, other documents).
- QRT Status (Quarterly status of the goals).
- Comments.
- All HS&E goals will be followed up and presented quarterly.

2. GENERAL HEALTH, SAFETY AND ENVIRONMENT

2.1 General

Everyone wants a safe, healthy and environmentally friendly work place. Such a work place is a combination between sound HS&E Management and the individual.

All employees shall perform their duties in compliance with local laws and regulations, including requirements set in Fluenta's QA - and HS&E Management system. Each individual employee has full responsibility for working in a safe manner and contributing to a safe working environment.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

2.2 Legal requirements

Fluenta shall always perform work operations in accordance with local laws and regulations. If work operations are performed in areas with less stringent requirements than described in Fluenta's HS&E Management system, Fluenta's HS&E Management system shall still apply to any operation unless the relevant Business Line Managing Director approves dispensations with alternative safety measures.

2.3 Health, Safety and Environmental training and information

2.3.1 Training

All new personnel in Fluenta shall receive predefined induction training. This training will also include HS&E related information. All Fluenta personnel shall as a minimum be familiar with the internal HS&E induction program. In general, Line Management in co-operation with QA/HS&E Department will be responsible to define relevant HS&E training for Fluenta personnel, including specific information regarding:

- HS&E related procedures and guidelines.
- Risk Assessment
- Personnel Protective Equipment, including cleaning and maintenance.
- Incident and accident report requirements.


Additional specific training will be provided as and when required depending on the duties of each individual. This will be evaluated and controlled by relevant Line Management.

2.3.2 Information

The following HS&E related information will be delivered to all Fluenta staff :

- Description of Fluenta's QA/HS&E Management System, including:
 - Policies
 - HS&E Manual
 - Procedures
 - Guidelines
 - Forms & Checklist
- HS&E related surveys
- General HS&E related information
- HS&E related induction training

In general, HS&E related information will be distributed continuously on the Intranet by the QA/HS&E Manager.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

2.3.3 HS&E Induction training of new Employees

In order to adhere to Fluenta's HS&E policy, it is the intention that within 14 days of employment, all employees (whether short term or permanent staff) will be introduced to Fluenta's general terms and conditions. This presentation includes an introduction of Fluenta's Quality- and HS&E Management system. Health and Safety induction training should cover a number of areas including:

- Organisation, Management, Safety Delegates/Representatives roles and responsibilities.
- Fluenta's HS&E policy, procedures and Guidelines
- HS&E related techniques required to perform daily tasks in a safe manner (Risk Assessment, Etc.)
- Specific hazards relating to daily tasks
- Workplace hygiene and housekeeping methods
- Emergency procedures
- Accident/injury/illness reporting
- Use and maintenance of personal protective equipment
- Etc.

2.3.4 Record of training

All types of training performed (internal and external) should be recorded in Fluenta's training record file, and each individual shall be responsible to update their own file. The training program record will include:

- the names of persons receiving training
- date of attendance at any training program (internal/external)
- a general outline of the course content
- where applicable, certificate number.
- Expire date
-

2.3.5 Line Management Responsibilities


Line Management is responsible to ensure that each individual has received Fluenta's HS&E induction training. The Line management is also responsible to evaluate/define additional training for personnel as required.

2.4 General HS&E requirements

2.4.1 Safety Devices and protective equipment

The objective with Personal Protective Equipment is to protect employees from injuries, by creating a barrier against workplace hazards. The availability and utilisation of safety devices, including Personnel Protective Equipment, is a Line Management Responsibility.

This responsibility includes purchase, storage, inspection and maintenance of safety equipment and provision for the necessary training of personnel in its use. Detailed information regarding Personal Protective Equipment will be described in *Chapter 4*.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

2.4.2 Fire Safety

Fluenta will provide the necessary fire fighting equipment in accordance with local requirements. General fire safety instructions:

- All employees shall be familiar with fire instructions and local escape plans
- Fire instructions, and escape plans shall be located at strategic places in each Fluenta facility.
- Fire drills should be arranged at regular intervals to monitor the efficiency of the local fire safety Management.
- Existing fire fighting equipment and alarms should be inspected frequently, as a part of the HS&E inspections.
- Fire fighting equipment shall be inspected and a certificate issued by a competent authority on a frequent basis.
- Fire exits must be kept clear at all times.
- Smoking is only permitted in designated areas.
- Training should be offered to personnel in the use of fire fighting equipment.
- You should know which extinguishers are available in your working area. This shall be described in local escape plans (all fire fighting equipment will be located on this map).
- In particular you should ensure that combustible materials do not accumulate around your place of work. Flammable materials must never be exposed to hot surfaces or direct heat sources.
- In the event of a fire, the premises should be evacuated immediately as described in Fluenta's fire instruction.
- Fire extinguishers should only be removed from their wall brackets in an emergency.
- Removal of fire extinguishers, first aid kit, etc. in other cases without good reason will be considered as a serious rule violation.


2.4.3 Housekeeping

Good housekeeping in all areas is essential for the prevention of accidents and unwanted events.

All Fluenta facilities are to be maintained with good housekeeping practices.

General housekeeping rules:

- No dirty work clothing, boots or gloves will be allowed in the "office facilities".
- No dirty work clothing, boots or gloves shall be brought into the canteen area.
- Keep work areas clean, and clean up work areas upon completion of an operation or at the end of each workday.
- All work areas shall be maintained in a way that provides a safe and organised working environment.
- Ensure all entrances, corridors, walkways are kept clear of obstructions at all times.
- Stairways and walkways are not permitted as storage areas. Access to exits and emergency equipment, such as eye wash stations and emergency showers, must be maintained free from obstructions.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

- Close all cabinets, and drawers after use.
- Never overload shelves or store heavy items above head height.
- Clear away immediately any dangerous substance or spillage.
- Equipment/objects must not be left where they can be a tripping hazard.

2.4.4 Manual Handling

2.4.4.1 General

In general, lifting and moving loads by hand is one of the biggest causes of injury in the workplace. Employers must ensure that wherever possible, manual handling tasks involving a risk to the health and safety of employees are avoided so far as reasonably practicable. Where these tasks cannot be avoided, Line Management shall carry out a risk assessment (Safe Job Analysis) of the risks involved and will reduce those risks to the lowest level reasonably practicable.

2.4.4.2 Duties of Line Management

- Try to minimize the need for manual handling
- Where it is required (Local laws and regulations), assess handling tasks
- Provide information on how to reduce the risk of personal injury.
- Provide training in any type of lifting equipment

2.4.4.3 Duties of Employees

All employees shall make full and proper use of any system of work or mechanical aid provided by Fluenta in order to reduce the risks associated with manual handling activities. Employees must inform their Line Management of any existing physical conditions that might affect their ability to undertake manual-handling operations safely.

2.4.4.4 Personal Protective Equipment- related to Manual Handling

When lifting operations occur, all employees must wear appropriate personal protective equipment for the tasks (Ref. chapter 4 - Personal Protective Equipment).


2.4.4.5 Review of the work/mechanical aids

All work/mechanical aids shall frequently be inspected and maintained in accordance to local laws and regulations. Improper equipment shall be removed immediately and scraped. (Ref. HS&E Operational Guidelines-Chapter 3)

2.4.4.6 General guidelines to correct lifting

In general, lifting should be carried out in accordance with the following:

- If a load is beyond your capability you must get help.
- Check all packaging & articles for sharp edges & projections before lifting.
- Ensure that there are no obstructions in your walking way before lifting any objects/ equipment.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

- Ensure that you can see around a load when lifting it.
- Ensure that there is adequate room to put down a load when you have moved it.
- Heavy goods are to be lifted by dedicated lifting equipment (forklifts/cranes/etc.).

Note: Do not use lifting equipment unless you have been trained and authorized.

- When lifting, stand close to the load with your feet slightly apart.
- Bend your knees and keep your back straight at all times (not necessarily vertical, 15-20 degrees from vertical is all right).
- Centre of gravity over the load
- Arms close to the body - nearer the centre of gravity
- Hands palms grasp - roots of the fingers + palm of the hand
- Straighten your knees using your thigh muscles
- Always lift in stages (e.g. floor to knee, knee to carrying position).
- Always use your entire body weight in a controlled manner when pushing a load.

2.4.4.7 Information and training

All employees performing frequent Manual Handling, should be given related training in correct handling methods, which should include:


- the reasons why the training is being given
- the effects poor handling can have on the body and how injuries can occur
- types of correct lifting methods
- risk assessments related to manual handling
- the correct use of personal protective equipment
- the duties of employees
- Etc.

All training shall be recorded and filed in the individual personal file. Training may be general (e.g. general lifting techniques) or specific (e.g. new lifting gear, etc).

2.4.5 Preventing slips and fall

Falling accidents will be reduced by following good housekeeping practices (ref. 2.4.3). Some guidelines to be followed to avoid slips and falls:

- Do not run in work areas.
- Ensure that walking ways are adequately lighted.
- Use proper ladders to reach high places, never climb onto a chair, drawer, or shelves etc.
- Keep walking ways free of obstacles.
- Remove items that may pose a potential slipping hazard.
- Clean up spills as soon as they occur.
- Never obstruct your view when walking.
- Be careful with shoes that have slippery heels or soles.
- Hold the handrail when using stairs.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

- Be careful when walking on wet surfaces or when entering a building while wearing wet shoes.
- Avoid "horseplay".
- If any damages occur on the surfaces, such as loose or missing floor tiles, etc.; this should be reported as soon as possible for repair.

2.4.6 Hazardous chemicals and substances

The requirements regarding chemicals and substances shall, as a minimum, always be in compliance with valid local regulations.

General requirements:

- All chemicals and substances shall prior to purchase be evaluated by qualified personnel to ensure that these are the least health and environmentally hazardous from a cost and efficiency view.
- All chemicals purchased and available shall have Material Safety Data Sheets (MSDS) in accordance with local regulations. Local Safety Delegate/Representative shall be responsible to frequently check and maintain available chemicals/substances against the MSDS record book.
- All personnel in the working area shall be familiar with location and use of the MSDS record book.
- All chemicals shall be classified and labelled in accordance with local rules and regulations.
- A "Safe Job Analysis" shall be performed prior to all working operations of hazardous materials.

2.4.7 First Aid

First aid is the immediate care of a person who has been injured or has suddenly taken ill. It is intended to prevent death or further illness and injury and to relieve pain until medical aid can be obtained. Fluenta has established first aid guidelines in order to have a general description in case of a first aid situation.


2.4.8 Visitor Safety

Employees must take special care to ensure visitor safety. This is particularly important when bringing visitors to potentially hazardous areas such as workshops, etc. Visitors should always be escorted and supervised through Fluenta facilities. Any injuries sustained by visitors while in Fluenta facilities are to be reported immediately into Fluenta's Improvement System (FIS).

2.4.9 Waste handling

Fluenta aims at complying with waste collection systems implemented by local community. Typical waste types in case of source separation may be:

- Paper
- Left-over
- Special wastes like painting, chemicals, solvents, etc.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

The individual Office/Region Managers are responsible to organise the required practical arrangements. Refer to Chapter3 in this manual.

2.5 HS&E inspections and surveys

To evaluate and measure the efficiency of the HS&E Management system, inspections/audits and surveys shall be performed frequently, such as:

- HS&E related inspections at workshop/Lab. areas.
- HS&E related inspections at office facilities.
- Working environment surveys.

The HS&E related inspections will be performed by the local Safety Delegates/Representatives in cooperation with Line Management. Working Environment surveys will be coordinated by the QA/HS&E Manager. Performance of inspections/audits and surveys will be described in detail in established procedures/Guidelines.

3. HEALTH & SAFETY OPERATIONAL REQUIREMENTS

3.1 General

Fluenta has established several Health and Safety operational related requirements. The purpose of these requirements is to describe the minimum requirements for Health and Safety in the daily working activities in Fluenta.


3.2 Safety Operational requirements

3.2.1 Fall Protection/Safe Working from Heights

All Company facilities shall minimise exposure to falls.

1. When scaffolding is required, stairways and elevated walking/working areas shall be equipped with handrails.
2. Work shall **Never** be performed at a lower level beneath work performed at height.
3. When working **over 2** meters, the working area shall be cordoned-off, and marked with a "Working at height" sign.
4. Fall protection, arrest systems shall be used when working at elevated levels above 2 meters.
5. Only trained and qualified personnel shall install scaffolding.

NOTE: Elevation is defined as 2 meters above normal working surfaces or where a fall hazard exists.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

3.2.2 Lifting Gear

Fluenta has incorporated a system where all lifting gear will be inspected and maintained on a frequent basis. Local regulations and legislation may impose particular requirements however, the following should be used as guidance:

1. The local relevant requirements will be applied to all lifting equipment.
2. Regular internal routine inspections will be made of all lifting gear.
3. All lifting equipment inspected and certified for use will be identified with a tag.
4. Only equipment with a tag shall be used, if equipment is found without this tag it must be either destroyed or tagged with a red tag and placed in a quarantine area.
5. In the event a routine inspection reveals a defect which may affect the safety of the lifting gear, the lifting gear will be withdrawn from service and destroyed, or repaired.
6. Any item of lifting equipment subject to repair or alteration shall be re-certified and tagged or authorized for used before being reinstated according to requirements.
7. A system which identifies the Safe Working Load (SWL) for all lifting tools shall be implemented on each location where relevant.

3.2.3 Crane and Forklift Operations

Only qualified personnel can be authorised to assist in crane or forklift operations on clients or Fluenta facilities.


3.2.4 Welding

Only trained and skilled personnel shall perform welding operations, if required.

3.2.5 High Pressure Testing/Working Operations

It is a policy of Fluenta that adequate control measures shall be implemented during high pressure testing and operations involving high pressure.

- Relevant workshops/laboratories shall establish specific procedures for the control of high Pressure testing operations when there is significant risk to people, property, and/or the environment.
- Areas where high pressure testing is taking place will be appropriately marked/barricaded.
- The client's requirements for controlling testing will be adhered to.
- All personnel in the area shall be made aware of high pressure testing.
- All high pressure testing shall be performed in dedicated secured areas,
- All types of high pressure testing shall be performed by qualified personnel.
- Lines, hoses, piping, etc. which are not fixed **shall** be secured with safety lines during high pressure testing to prevent "whipping".

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

3.2.6 Recycling, Waste Minimisation and Hazardous Waste

All Fluenta facilities will make an effort to reduce waste and recycle products:

- Company facilities will establish recycling practices in areas of operation where recycling facilities exist.
- Company locations will reduce industrial and hazardous waste to a level as low as reasonably practicable (ALARP).
- The handling of hazardous waste will be in accordance with local requirements or, in the absence of applicable laws, handled in a manner representative of Fluenta's concern for the environment.
- All Fluenta facilities should evaluate and utilise environmentally friendly products.

3.3 Health Operational requirements

3.3.1 Occupational Hygiene Surveys

In conjunction with line management, Fluenta will organize and implement occupational hygiene surveys in accordance with local requirements. Such surveys may result in advice on control measures for follow up requirements. Areas that may be subject to survey include noise, chemical and dust.

3.3.2 Sanitation and Hygiene

Fluenta will have frequent inspections in the facilities and food service areas to ensure that high standards of hygiene are maintained according to local requirements.

3.3.3 Substance Abuse


Fluenta have a **zero** philosophy regarding substance abuse.

- Employees involved in an incident which caused, or reasonably could have caused, significant injury or damage to persons or property may be drug tested where local laws allow.
- Employees reasonably suspected of substance abuse will be drug tested by medical personnel according to procedure.
- Random drug testing of employees may be conducted by clients when stated in the contract.

3.3.4 Dress requirement

It is a policy of Fluenta that personnel dress to ensure they are protected from weather conditions etc., as well as to ensure personal safety.

1. Workshop personnel shall use proper coveralls when working in the workshop and in the storage yards/area.
2. Workshop personnel shall **always** wear Steel-toed boots or shoes when working in workshop facilities.
3. Visitors shall always be guided by workshop personnel in "safe areas".

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

4. Visitor PPE shall be available at all workshops/labs.
5. Gloves (cloth, rubber, leather, etc.) should be worn to protect the hands dependent upon the exposure.
6. Safety glasses/goggles shall be used when required by the working situation.

Refer to chapter: 4 Personal Protective Equipment

3.3.5 Hearing Conservation

All personnel on Fluenta's facilities are to be made aware of high noise level areas, and adequate protection is to be provided and worn.

3.3.6 Radioactive and explosive Material

No radioactive and/or explosive materials shall be brought into any company facility without proper approvals.


1. The relevant Department Manager will be responsible for the placement and security of any radioactive and/or explosive materials brought into any pathway facility.
2. All explosive and/or radioactive materials shall be stored in an approved and secured area.
3. Any such area will be clearly marked and designated as an approved storage area.
4. Amounts of explosive and/or radioactive materials stored in the facilities (designated area) shall at any given time be known by responsible personnel, and a stock list shall be available for inspection.
5. Only qualified personnel are permitted to handle radioactive or explosive materials.

4. PERSONAL PROTECTIVE EQUIPMENT

4.1 Introduction

The objective of this chapter is to describe Fluenta's requirements related to Personal Protective Equipment (PPE). This equipment shall protect employees from the risk of injury by creating a barrier against workplace hazards. Personal protective equipment is not a substitute for good engineering or administrative controls or good work practices, but should be used in conjunction with these controls to ensure the safety and health of employees. Personal protective equipment shall be provided, used, and maintained when it has been determined that its use is required and that such use will lessen the likelihood of occupational injury and/or illness. This chapter will describe several types of protection:

- Eye protection
- Face protection
- Head protection
- Foot protection
- Hand protection

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

When performing work that could result in a Hazard, approved safety equipment and protective clothing shall always be available and used.

Note: All approved protective equipment shall be marked with a stamp/tag, and all non approved protective equipment shall be trashed or clearly marked with a "Non approved" stamp/label.

4.2 Responsibilities

4.2.1 Supervisors/Department Managers

Supervisors/Department Managers have the primary responsibility for implementation of the PPE Program in their work area. This involves:

- Providing appropriate PPE and making it available to employees.
- Ensuring employees are trained on the proper use, care, and cleaning of PPE.
- Maintaining records on PPE assignments and training.
- Supervising staff to ensure that the PPE Program elements are followed and that employees properly use and care for PPE.
- Seeking assistance from QA/HS&E Department to evaluate hazards.
- Ensuring defective or damaged equipment is immediately replaced.

4.2.2 Employees


The PPE user is responsible for following the requirements of the PPE program. This involves:

- Wearing PPE as required.
- Attending required training sessions.
- Caring for, cleaning, and maintaining PPE as required.
- Informing the supervisor of the need to repair or replace PPE.

4.2.3 QA/HS&E Department

The QA/HS&E Department is responsible for the development, implementation, and administration of the PPE requirements. This involves:

- Conducting workplace hazard assessments (risk analysis) to determine the presence of hazards which requires use of PPE.
- Conducting periodic workplace re-assessments as requested by supervisors/Department Managers.
- Maintaining records of the hazard/risk assessments.
- Providing training and technical assistance to supervisors on the proper use, care, and cleaning of approved PPE when required.
- Providing guidance to the supervisor for the selection and purchase of approved PPE when required.
- Periodically re-evaluating the suitability of previously selected PPE.
- Reviewing, updating, and evaluating the overall effectiveness of the PPE equipment/implementation.
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|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

4.3 Types of protection

4.3.1 Hazard Assessment and Equipment Selection

QA/HS&E Department requires each individual Business Line to conduct inspections of all workplaces to determine the need for personal protective equipment (PPE), the QA/HS&E Department may assist in selecting the proper PPE for each tasks performed. Risk Assessments shall be performed in accordance with local laws and regulations.


4.4 Protective Clothing/Devices

All personal protective clothing and equipment shall be of safe design and construction for the work to be performed and shall be maintained in accordance with recommendations from the supplier. Only those items of protective clothing and equipment that meet known international/national standards shall be procured or accepted for use. Careful consideration should be given to comfort and fit of PPE in order to ensure that it will be used. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected.

4.4.1 Eye and Face Protection

Prevention of eye injuries requires that all persons who may be in eye hazard areas wear protective eyewear. This includes employees, visitors, contractors, or others passing through an identified eye hazard area. To provide protection for these personnel, responsible persons of such areas shall procure a sufficient quantity of goggles and/or plastic eye protectors which afford the maximum amount of protection possible. If these personnel wear personal glasses, they shall be provided with a suitable eye protector to wear over them. Suitable protectors shall be used when employees are exposed to hazards from flying particles, chemical liquids, gases, or vapours, or potentially injurious light radiation (welding, etc.).

- Wearers of contact lenses must also wear appropriate eye and face protection devices in a hazardous environment.
- Side protectors shall be used when there is a hazard from flying objects.
- Goggles and face shields shall be used when there is a hazard from chemical splash.
- Face shields shall only be worn over primary eye protection (safety glasses or goggles).
- Protectors shall be CE-marked (in Europe), and well approved in the rest of the regions.
- Equipment fitted with appropriate filter lenses shall be used to protect against light radiation.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

4.4.1.1 Prescription Safety Eyewear

Fluenta requires that each affected employee who wears prescription lenses while engaged in operations that involve eye hazards shall wear eye protection that incorporates the prescription in its design, or shall wear eye protection that can be worn over the prescription lenses (goggles, face shields) without disturbing the proper position of the prescription lenses or the protective lenses. Personnel requiring prescription safety glasses must contact the Line Management or the QA/HS&E Department to have their request for prescription safety glasses processed.

4.4.1.2 Emergency Eyewash Facilities

Emergency eyewash facilities shall be installed in all areas where the eyes of any employee may be exposed to corrosive materials. All such emergency facilities will be located where they are easily accessible in an emergency.

4.4.2 Head Protection

Head protection shall be used by, all employees and contractors engaged in miscellaneous work that may result in hazards from falling or fixed object, etc. Head protection is also required to be worn by visitors in such areas.

4.4.3 Foot Protection


Approved Safety shoes **shall** always be worn in the workshops, warehouses, storage yard/area, maintenance, etc. All safety footwear shall comply with well-known International/National standards.

Safety shoes or boots with impact protection are required to be worn in work areas where carrying or handling materials such as packages, objects, parts or heavy tools, which could be dropped; and for other activities where objects might fall onto the feet.

4.4.4 Hand Protection

Suitable gloves shall be worn when hazards from chemicals, cuts, lacerations, abrasions, punctures, burns, and harmful temperature extremes are present. Glove selection shall be based on performance characteristics of the gloves, conditions, durations of use, and hazards present. One type of glove will not work in all situations.

The first consideration in the selection of gloves for use against chemicals is to determine, if possible, the exact nature of the substances to be encountered. Read instructions and warnings on chemical container labels/Data sheet before working with any chemical. Recommended glove types are often listed in the section for personal protective equipment. All glove materials are eventually permeated by chemicals. However, they can be used safely for limited time periods if specific use and other characteristics (i.e., thickness and permeation rate and time) are known. The QA/HS&E Department may assist in determining the specific type of glove material that should be worn for a particular chemical.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

4.5 Cleaning and Maintenance

It is important that all PPE be kept clean and properly maintained. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE should be inspected, cleaned, and maintained at regular intervals so that the PPE provides the required protection. Personal protective equipment shall not be shared between employees until it has been properly cleaned and sanitized. PPE will be distributed for individual use whenever possible. It is also important to ensure that contaminated PPE which cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.

4.6 Training

Any worker required to wear PPE shall receive training in the proper use and care of PPE. Periodic retraining shall be offered by QA/HS&E Department upon request to both the employees and the supervisors, as needed. The training shall include, but not necessarily be limited to, the following subjects:


- When PPE is necessary to be worn.
- What PPE is necessary
- How to properly don, doff, adjust, and wear PPE.
- The limitations of the PPE.
- The proper care, maintenance, useful life and disposal of the PPE.

4.7 General PPE selection Guidelines

4.7.1 Eye and face protection selection chart-guidelines

Eye and Face Protection Selection Chart

| Source | Assessment of Hazard | Protection |
|---|---|---|
| IMPACT - Chipping, grinding, machining, drilling, etc. | Flying fragments, objects, large chips, particles, sand, dirt, etc. | Spectacles with side protection, goggles, face shields. For severe exposure, use face shield over primary eye protection. |
| CHEMICALS - Acid and chemicals handling | Splash, Irritating mists | Goggles, eyecup and cover types. For severe exposure, use face shield over primary eye protection Special-purpose goggles. |

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

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| DUST - general dusty conditions | Nuisance dust | Goggles, eyecup and cover types. |
| LIGHT and/or RADIATION Welding - electric arc Welding - gas etc. | Optical radiation | Welding helmets or welding shields. Typical shades: 10-14 Welding goggles or welding face shield. Typical shades: gas welding 4-8, cutting 3-6, brazing 3-4 Spectacles or welding face shield. Typical shades: 1.5-3. Spectacles with shaded or special-purpose lenses, as suitable. |

4.7.2 Hand protection selection chart-guidelines

The following is a guide to the most common types of protective work gloves and the types of hazards they can guard against:

Disposable Gloves

Disposable gloves, usually made of light-weight plastic, can help guard against mild irritants.

Fabric Gloves


Made of cotton, are generally used to improve grip when handling slippery objects. They also help insulate hands from mild heat or cold.

Leather Gloves

These gloves are used to guard against injuries from sparks or scraping against rough surfaces. They are also used in combination with an insulated liner when working with electricity.

Metal Mesh Gloves

These gloves are used to protect hands from accidental cuts and scratches. They are used most commonly by persons working with cutting tools or other sharp instruments.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

Aluminized Gloves

Gloves made of aluminized fabric are designed to insulate hands from intense heat. These gloves are most commonly used by persons working molten materials.

Chemical Resistance Gloves.

These gloves may be made of rubber, neoprene, polyvinyl alcohol or vinyl, etc. The gloves protect hands from corrosives, oils, and solvents.

5. INCIDENT REPORTING AND INVESTIGATION

5.1 General

It is Fluenta's policy that all unsafe incidents, injuries and work related diseases are reported in accordance to an established procedure. This to ensure that all work related accidents, incidents and near misses are identified and that appropriate action are taken to prevent a reoccurrence. It is also important that incidents such as near misses, which have the potential to cause accidents also are identified, reported and investigated. Fluenta's incident reporting system is one of the major elements in Fluenta's HS&E Management system, which is a valuable tool in the identification of safety related issues, definition of corrective actions, trend analysis, and reporting, etc.

In general, each individual shall inform their Line Management about anything related to work which has caused or had the potential to cause harm to themselves or to others. The monitoring of such reports is an important aspect of the control of health and safety at work.


5.2 Incident and accident reporting

5.2.1 Documenting of accidents and incidents

All types of incidents shall be reported as soon as practically possible into "Fluenta's QA/HS&E Report Form". This reporting shall be performed in accordance with established incident and accident reporting procedure. If the incident leads to bodily injuries, or if it is suspected that such injuries or long-term illness may occur as a later consequence of the incident, the relevant forms shall be filled in and sent in accordance with local regulations. It is the relevant Line Manager's responsibility to ensure that this is adhered to.

5.2.2 Reporting of Lost Time Accidents (LTA)

All Lost Time Accidents shall be notified by the relevant Line Manager/Office- or Region Manager to the relevant Business Line Managing Director by telephone as soon as practically possible.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

The relevant Managing Director shall within 24 hours by telephone notify:

- Managing Director
- QA/HSE Manager

5.2.3 Reporting of Non Lost Time Accidents (NLTA)

NLTA's and other accidents with major loss potential (e.g. accidents which, under slightly different circumstances **might have caused serious injuries** to personnel or major damage to material assets or environment) shall be notified in the same way as LTA's.

All NLTA's shall as soon as possible be reported. The relevant Line Manager in co-operation with the QA/HS&E Department will decide whether or not a more detailed report shall be required.

5.2.4 Reporting of Near Miss Incidents (NMI)

NMI's with major loss potential (e.g. incidents which, under slightly different circumstances **might have caused serious injuries** to personnel or major damage to material assets or the environment) shall be notified by telephone in the same way as LTA's. All NMI's shall as soon as possible be reported. The relevant Line Manager in co-operation with the QA/HS&E Department will decide whether or not a more detailed report shall be required.

5.2.5 Analysis of Accidents/Incidents and implementing of Corrective Actions

After an incident report is written, this report shall be forwarded to a "Case Processor", which will be responsible to perform an analysis in order to reveal the basic/underlying causes of the incident, and to suggest corrective actions for avoiding occurrences. The extent of the analysis will depend upon the classification of the criticality of the report. Based on this analysis, corrective actions will be decided and implemented. Implementation of actions and "close out" of the report shall be performed in accordance with the established procedure.


For "Major Incidents" a Safety Notice with a preliminary description of the incident shall, if practically possible, be prepared and distributed to all relevant employees not later than the consecutive working day after the incident.

5.3 Investigation of accidents/incidents

5.3.1 Investigation of Accidents/Incidents

Performance of accident/incident investigations depends on the seriousness and criticality of the incident. A detailed description of how to perform incident/accident investigations will be described in an established procedure.

This section will describe the general process of incident investigations.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

- To identify the root causes of incidents so that preventative measures can be taken to avoid the possibility of future similar events.
- To establish facts regarding the incident for use in relation to potential insurance claims, etc.
- To meet relevant statutory and internal Fluenta requirements for incident reporting.
- Etc.

The relevant Line Manager shall in co-operation with the QA/HS&E Department decide on the necessary actions to perform a detailed investigation. If the Line Manager and the representative from the QA/HS&E Department fail to agree, the Managing Director /MD shall make the final decision.

The incident investigation process will include the following general stages:


- notification from the incident site
- composition of investigation team
- preparation for incident investigation
- fact finding
- analysis of investigation findings
- recommendations
- investigation report
- management comments
- implementation of recommendations
- distribution of investigation findings
- incident investigation follow-up

Some overlaps may occur in these stages.

In connection with the investigation of a major incident it is important that involved (non-injured) personnel are available for the investigation team. The location of the incident should be safely secured and involved equipment shall be clarified and accepted by the relevant Line Management in cooperation with the investigation team before the working operation starts-up again.

5.4 Statistics and trend analysis

Statistics and trend analysis regarding QA and HS&E related incident reports will be performed by the QA/HS&E Department. Trends and statistics will frequently be presented for the Management in relevant meetings, and upon request. The major reason for performing statistics and trend analysis is to collect data for detailed analysis of accidents and illnesses in order to eliminate causes by pinpointing specific problem areas and taking appropriate follow-up action. Statistics and trend analysis will also be used as a means to measure the success of the QA/HS&E Management system in Fluenta.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |


Where statistics and trends indicate that a problem exists, management is expected to consult with relevant personnel to ensure that timely corrective action is planned.

Some typical outputs from statistics and trends:

- Number and types of reports based on location, criticality,
- Reports sorted by time periods (possible to see peaks through a time period)
- "Open" reports, which are overdue based on deadlines.
- Evaluate typical trends of locations, equipment, working areas, working groups, etc.
- Cost estimates of individual incident reports
- Lost Time Accident Frequency rates (graphs, etc.)
- Etc.

5.5 Responsibilities

| | |
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| Any personnel: | witnessing or causing an accident/incident shall as soon as practically possible report this in accordance with Fluenta's procedure. |
| Safety Delegate/Representative: | shall assist the Line Management or the "Investigation group" in the investigation and follow up of an incident/accident. |
| QA/HS&E Department: | The QA/HS&E Department shall co-operate with and advise the Line Management regarding necessary implementation of corrective/preventive actions and verify that these actions are implemented and functioning as intended. The QA/ HS&E Department shall maintain safety statistics, and ensure proper distribution of HS&E related documentation (i.e. reports, procedures, manuals, statistics etc.). |
| Line Management: | are responsible for the decision and implementation of corrective/preventive actions in co-operation with QA/HS&E Department. The Line Management will also provide required assistance during investigation and analysis of the incident. If an accident involves personnel injuries to such an extent that the injured person(s) has to be evacuated and transported to hospital, it is the Line Managements responsibility to ensure |

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

proper transportation to hospital. The Line - Management is also responsible for following up the injured person(s) in co-operation with the HR Department and/or Company Health Service.

6. RISK ASSESSMENT

6.1 General

It is a requirement in Fluenta to encourage all staff and third parties to work together to create a healthy and safe working environment. To fulfil this requirement, hazards have to be identified and suitable steps taken to prevent injuries or poor health to Fluenta staff, or third parties, who may include contractors or visitors. A risk assessment is simply a careful examination of anything that may cause harm to you or others during your work. Once this is done, you will then be able to decide upon the most appropriate action to take to minimize the likelihood of anyone being hurt. The aim is to prevent accident and illness. It is carried out by identifying risk and using appropriate control measures to minimize or eliminate the risk.


This chapter is intended to describe the basic elements of risk, and to introduce a security risk assessment methodology and tool which is now used by many of the worlds major.

6.2 What is a Risk Assessment?

A risk assessment is a systematic identification of potential hazards in the working area, as a first step to controlling the possible risks involved. A hazard is anything that has the potential to cause harm. A risk is the probability of someone being exposed to that hazard and harmed as a result. Risk assessments must be performed in accordance to local laws and regulations. The risk assessment should assess the risk that may be present in work activities, and may identify particular areas for more detailed 'specific' assessments.

In general, these are the steps for performing a risk assessment:

- Identify the hazards to health or safety arising from the activity or the workplace.
- Decide who might be harmed and how
- Evaluate the risks and decide whether existing precautions are adequate or more needs to be done.
- Record your findings
- Review your assessment and revise it if necessary

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

6.2.1 Fluenta's Risk Acceptance Criteria's

When performing risk assessments, it is important to know what risk levels are acceptable for our company. Fluenta has established a Risk acceptance criteria's matrix, which describe:

- Different levels of Consequences
- Different levels of Probability
- Responsibility levels
- Estimated Risk Level

All risk assessments shall be compared to Fluenta's risk acceptance criteria's matrix, and use the ALARP principle, which means that we should aim to reduce our risk level to As Low As Reasonably Practicable.

Fluenta Risk Acceptance Criteria's:

| | > 5 year | 5 year | 1 year | ½ year | 14 days |
|------------------|-----------------|--------|--------|--------|---------|
| Fatality | > 5 mill nok E | E | E | E | E |
| Disabling injury | > 1 mill nok H | H | E | E | E |
| LTA | > 250 000 nok M | M | M | H | H |
| NLTA | > 50 000 nok L | L | L | L | L |
| NMI | > 50 000 nok L | L | L | L | L |

(E Extreme risk, unacceptable)
(H High risk)
(M Medium risk)
(L Low risk)

6.2.2 Why are Risk Assessments necessary?

Risk assessments are important for two main reasons:


1. It is a statutory requirement to identify risks in the working area.
2. It manages potential dangers in the workplace.

It is important to remember that it may not be possible to remove problems completely, but they shall be ALARP (As Low As Reasonably Practicable).

6.2.3 Who should attend in the Risk Assessment process?

A risk assessment should involve those who are responsible for and/or most likely to be affected by the hazard(s). This may include the employees who do the work task, Department Managers, Safety Delegate/Representative, etc. Relevant Department Managers are responsible (in co-operation with QA/HS&E Department) for developing a risk assessment plan for their area of responsibility, and completing assessments in accordance with local laws and regulations.

The Line Management of Fluenta has ultimate responsibility to ensure that risk assessments are performed.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

6.2.4 When should a risk assessment be conducted?

The QA/HS&E Department has prepared several procedures/guidelines, which describes how and when to perform different kinds of risk assessments. When hazards have been identified in your workplace, an assessment of the risk associated with each hazard should be conducted. A risk assessment should also be conducted when new information about a hazard is received or whenever there is a change in the workplace that could affect health and safety of workers, for example:

- the introduction of any new equipment or substance
- the introduction of a new or changed work practice or procedure
- new personnel involved

6.2.5 How should a risk assessment be performed?

Depending on the nature of the hazard, the risk assessment process will vary from a straightforward visual inspection of the workplace, through a formal quantitative assessment for high-risk situations. In general, a risk assessment may involve one or more of the following:

- visual inspection
- different types of risk analysis methods
- technical or scientific evaluation (calculations, etc.)
- trend analysis of injury /incident data

6.2.6 What factors need to be considered?

The factors to be considered are:

- Nature of the hazard
- Probability of exposure
- Frequency and duration of exposure
- Consequences of exposure

Probability (frequency) x Consequence will give you a degree of risk or "risk factor".


(Example: A Lost Time Accident with a probability frequency of 5 years, will give a "risk factor" of "**M-Medium**" (Yellow).)

6.2.7 Documentation of risk assessments

All types of risk assessments should be documented. Records must be kept to demonstrate the existence and completion of the process. Records of Risk Assessments shall be maintained in accordance to established procedures

6.2.8 Storage time for Risk Assessments

Risk assessments should be kept for at least five years.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

6.2.9 Hazard Identification

A hazard is something that has the potential to cause harm, whether to persons, health or property. Hazards can occur in any areas, and it is therefore very important to find these hazards and implement corrective actions to eliminate/reduce these to an acceptable level. Identification of hazards present in the workplace can be undertaken through:

- Safety audits and inspections of the workplace to evaluate Fluenta's HS&E Management system.
- Incidents, including near misses and accidents provide important information regarding hazards and risks at the workplace.
- Accident and incident investigations are necessary so that the relevant hazards can be controlled where a situation has caused an accident
- Injury and sickness records are a good indication of hazards that exist in the workplace and analysis of these records can highlight those hazards
- Health surveillance, as with accident and sickness records, can give indication of the presence of hazards that have not been controlled
- Complaints from employees are a common way for hazards to be identified through Line Management.

Once hazards have been identified, they have to be evaluated. Hazards may cause harm to a person or property in many different ways and each of these ways has to be identified.

6.2.10 Types of Risk Analysis

In general, Fluenta will use three different types of risk assessments, which is described in established procedures. These are:


- SJA - Safe Job Analysis
- HAZOP Analysis (Hazard and Operability Analysis)
- FME(C)A – (Failure Mode Effect (&Criticality) Analysis)

6.2.10.1 Safe Job Analysis (SJA)

This is one type of risk analysis which is normally used prior to job tasks as an examination to identify hazards related to the tasks. This type of analysis is an analysis of the hazards associated with a particular job/task through standardised (pre-defined guidewords) checklist.

Work requiring a Safe Job Analysis (SJA):

- Jobs where minor unwanted incidents occur frequently or where they occur infrequently but may result in injuries.
- When there are potential consequences of an accident, hazardous condition, or exposure to harmful substance.
- Tasks that have a history of, or potential for, injury, near miss or loss related incidents
- For new and unknown tasks not covered by existing procedures.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

- Where several activities take place within the same area at the same time.
- For operations where equipment is to be lifted, tensioned or pressurised, etc.
- Jobs that have changed.
- Tasks that have been rarely performed or where new people are performing the task.
- Tasks where workplace application or environmental conditions have or may change
- Tasks performed under Permit to Work conditions.

6.2.10.2 HAZOP Analysis

This is a method for identifying problems that may represent risks to personnel or equipment, or prevent efficient operation.

- Systematic and qualitative method based on the use of guide-words.
- Often used in front of medium complex operations (e.g. process work)
- Multi-disciplinary team effort

The purpose of a HAZOP analysis is to identify hazards and potential risk factors related to technical systems and operations. The method is most often used for planned operations, and is carried out at the start of the operation. Its purpose is also to identify all possible deviations from the way in which a design is expected to work, or an operation should be performed, and to identify all the hazards associated with these deviations. Where deviations arise that result in hazards, decisions are required by responsible personnel to suggest solutions to either remove the hazard or reduce its risk to an acceptable level. These solutions shall be reviewed and accepted by the HAZOP team before implementation.


By undertaking a HAZOP study at an early design stage, potential problems can be avoided instead of having to make costly modifications after the product is built. However, HAZOP's can be done at any stage after the design is nearly firm.

The overall aims to which any HAZOP should be addressed are:

- To identify all deviations from the way the design is intended to work, their causes, and all the hazards and operability problems associated with these deviations.
- To decide whether action is required to control the hazard or the operability problem, and if so, to identify the ways in which the problems can be solved.
- To identify cases where a decision cannot be taken immediately and to decide on what information or action is required.
- To ensure actions decided are followed through.

6.2.10.3 FME(C) A Analysis

The purpose of performing a FMEA - Failure Mode and Effects Analysis is to identify component failure modes, and evaluate their operational and safety effects. This to ensure that the finalised product meets customer needs and

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|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

expectations. When potential failure modes are identified, corrective action can be taken to eliminate them or to continually reduce a potential occurrence. If or when required, it is also possible to estimate the Criticality of each individual equipment failure. The analysis is then called FME(C) A.

The method may be used when a design is completed in order to discover risks connected to a system (but it is preferable to do the analysis prior to building the actual system, since it then will be more cost effective to implement corrective measures). It may also be used on already existing systems in order to document the system's reliability, to discover unknown risks related to use of the system or to help in planning of maintenance.

Note: This method is a systematic review of a system's components/equipment to identify all significant failure modes and find their consequence for the system. It is important to note that this method only analyse one component at the time, and assume that the rest of the components in the system works satisfactory. Other analysis methods should be used when analysis of more complexed systems is required. (Event tree analysis (ETA), Fault tree analysis (FTA), etc.)

7. EMERGENCY PREPAREDNESS AND RESPONSE

7.1 Purpose


Some emergencies are inevitable, and some events are simply out of our control regardless of how many precautions we may take. The purpose of this Emergency Preparedness & Response chapter is to make the organisation prepared to respond to emergency situations.

This chapter is divided into two main categories:

- Emergency Preparedness
- Emergency Response

7.2 Why prepare for emergencies

When any types of emergencies occur (Such as fires, explosions, war/terror situations, etc.), shortage of time, lack of resources, untrained personnel, and urgent need for quick decisions, may lead to chaos in the organisation. Through an emergency preparedness system, this will be reduced and the risk of loss from such emergencies will be minimized. Effective emergency preparedness includes efficient procedures and guidelines, training and awareness of personnel, and an effective communication/information system.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

7.3 Emergency Management Goals

The goals of Emergency Preparedness & Response Management are to minimize the effects of emergencies or to prevent emergencies from occurring through preparedness, response, and recovery, in general:

- minimize the potential for loss of people, property and environment
- to ensure that all necessary equipment and systems are in place to deal with an emergency.
- help Fluenta to restore normal business activities as quickly as possible

7.4 Definitions

7.4.1 Definitions

LEVEL 1 – EMERGENCY

A Level 1 Emergency is a minor, localized department incident that is quickly resolved with existing local Fluenta resources or limited outside help. This type of emergency has little or no impact on personnel or normal operations or facilities outside the locally affected area. Evacuation of the area is usually not necessary. The Emergency Action Group will generally not be activated.

Examples:

Small local fire, smoke, chemical spill, individual medical treatment, etc.

LEVEL 2 – LOCAL EMERGENCY

A Level 2 Emergency is a local (individual office/workshop facility) emergency situation.

These types of emergencies may require assistance from external resources (for example: Local Police, Fire Brigade, etc.). A Level 2 emergency incident may represent threats to-/loss of life, the environment, or property. If external resources are required, this should be coordinated by the local Office-Managers/Regional F&A Managers, or deputies. Short-term evacuation of the area/building may be necessary.


The local Office Managers/Regional F&A Managers are responsible to decide if local Emergency Action Group should be activated or not.

Examples:

Fire, serious chemical spill, Serious First-Aid treatments, etc.

LEVEL 3 – REGIONAL / INTERNATIONAL EMERGENCY

A Level 3 Emergency is a type of emergency which may have an impact on major parts of Fluenta's organisation (Parts of facilities cannot of function, etc.) These types of emergencies require assistance from internal and external resources. A Level 3 emergency incident may represent major potential/actual loss of life/property, threats to the environment, etc. Local Office Managers/Regional Managers, or deputies will coordinate with external resources. If Level 3 Emergencies occurs, the relevant Business Line Managing Director (MD) shall immediately be contacted by the local Office Managers/Regional managers and

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

be continually updated on the status of the situation. The MD will continually update the Managing Director (MD).

Local Emergency Action Group shall be activated, and the MD will decide if Emergency Action Group in Bergen (Head Office) should be activated or not.

Examples:

Major Fire, War/terror situation, serious accident, etc.

LEVEL 4 – EMERGENCY (DISASTER)

A Level 4 emergency is any incident that:

- Requires widespread evacuation of the facility and/or the organisation
- May Involve multiple casualties and/or destruction of properties
- Potential for a serious threat to human health, the environment and/or property.

Level 4 emergency incidents generally require major internal/external assistance. The entire Emergency Action Group mobilizes at the Emergency Operations Centre, local and/or in Bergen (Head office).

Examples:

Hi jacking, war/terror situation, Major Fire, serious accident, earthquake, plane/helicopter crash, etc.


7.5 Emergency Preparedness

7.5.1 General

No matter what kind of precautions we take, we can't guarantee that an emergency won't occur in the future, but to be prepared for emergencies will significantly increase the efficiency, and reduce the response time and the possibility for chaos in the organisation. Emergency Preparedness will enable an effective integration of pre-planning and emergency response activities.

Some of Fluenta's emergency preparedness will include:

- To have Local Emergency telephone numbers continuously updated on the Intranet.
- Updated lists (names/telephone numbers) of the Emergency Action Group(s) on the Intranet.
- To have our emergency related procedures/guidelines available on Intranet.
- To clearly communicate Fluenta's organisation and responsibilities in front of an emergency situation.
- To have frequent HS&E inspections at our facilities.
- To have frequent checks on the fire fighting equipment.
- To implement Fluenta's emergency requirements through the Line Management.
- Establish and frequently test evacuation plans/maps for all Fluenta locations.
- Perform frequently fire/evacuation drills.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

7.5.2 Individual Preparations

All employees, without exception, are obligated to prepare themselves for possible emergencies or disasters. Some of the individual precautions might be:

- Be aware of local workplace hazards.
- Become familiar with the closest emergency exit and the proper evacuation route (Ref. evacuation plans).
- Be familiar with the types of accidents or events that could occur in the immediate work area.
- Ask the Line Management or QA/HS&E Department how to perform risk assessment if in doubt.
- Be familiar with emergency procedures/guidelines.
- **Never** do anything that might endanger anyone's safety or life.

Certain facilities or areas have an increased potential for an accident or emergency event due to the nature of work activities that take place there (Workshop, Offshore related work, etc.). The personnel who work in those areas are in the best position to provide feedback on better methods or practices to prepare for and respond to an incident. Any comment or suggestion for the

improvement should be directed to Line Management or QA/HS&E Department. It's also important to perform risk assessments in such areas.


7.5.3 Chain of command

A chain of command should be established to minimize confusion so that employees will have no doubt about who has authority for making decisions. Responsible individuals (including deputies) should be selected to perform different tasks in the event of an emergency. The areas of responsibility regarding emergency situations will be described in this manual and in our procedures/guidelines.

7.5.4 Emergency Control Room

An Emergency Control Room (ECR) should be established in a location on, or near the Fluenta facility, where the emergency is (depending on the situation). The purpose of an ECR is to provide a safe and practical area for the proper control of the emergency. The Emergency Control Room (ECR) is an area where dedicated personnel of the ECR and other designated emergency responders will assemble at, in the case of an emergency.

The ECR is a communication and logistical centre where all rescue efforts can be coordinated. The ECR will be activated by the MD or Region F&A/facility Managers (or deputies) in the regions/rest of the Norwegian offices. If it is impossible to use dedicated Emergency Control Room (due to the circumstances), an alternative shall be established immediately. The MD/ Region F&A/facility Managers will be responsible to inform the Emergency Action Group, and other relevant personnel about the new location.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

7.5.5 Emergency Response Organization

The incident level is determined by what has already happened, what is currently happening, and what could happen. Fluenta has defined 4 emergency levels (Ref. Definitions):

- LEVEL 1 – Emergency**
- LEVEL 2 – Local Emergency**
- LEVEL 3 – Regional / International Emergency**
- LEVEL 4 – Emergency (Disaster)**

Establishment of Emergency Response Organisations will depend on the emergency level.

7.5.5.2 Emergency Action Group Organisation – Head office

The Emergency Action Group is led by the MD and shall as minimum consist of:

- Managing Director
- Relevant Project Manager/Technical Expert
- QA/HS&E Manager/Human Resource Advisor

An Emergency Duty Contact list shall be prepared and continuously updated by the Human Resource Advisor. This list shall be used to contact EAG members or their deputies (if absent) in an emergency situation. This list shall also contain private- and mobile telephone numbers to enable contact after normal working hours.

All Accidents or serious hazardous situations shall be notified by the relevant Line Manager/Office-Manager to the relevant Business Line Managing Director by telephone as soon as practically possible.

In the regions outside Norway, the local Region Manager shall immediately by telephone notify:

- The Managing Director
- The relevant F&A Manager

The Managing Director shall within 24 hours by telephone notify:


- Managing Director
- QA/HSE Manager

For each EAG member, a deputy shall be appointed (with name/title and telephone numbers for office and private), thus ensuring that the Emergency Action Group can always be properly manned and capable of undertaking their tasks as necessary during an emergency situation.

7.5.6 Emergency Group - Main Responsibilities

The Managing Director:

- Mobilise the Emergency Action Group if required.
- Lead, direct and advise the Emergency Action Group.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

- Ensure that all resources to handle the situation are made available (if possible).
- If relevant, responsible for corresponding with any client/governmental management.
- Responsible to keep Fluenta's Board updated.
- Responsible to evaluate legal consequences.
- Responsible for contact with media
- Co-ordinate relevant internal resources within his organisation.
- If relevant, responsible for corresponding with the Client's management level.
- Ensure that relevant Authorities are contacted by appointed Fluenta personnel (in accordance with laws and regulations, or if requested to do so by the MD).

Relevant Project Manager:

- Direct, advice and provide technical support within his discipline function(s).
- If relevant, contact with the Client's operation and emergency department and be prepared to move to the Client's emergency centre.
- Request such resources as may be needed within his discipline functions.


QA/HS&E Manager:

- Provide support to Emergency Action Group on Health, Safety & Environmental Matters.
- Ensure that the Emergency Control Centre is provided with necessary equipment.
- If required, maintain contact with external HS&E organisations.
- Request necessary external expertise (Company Health Service, etc.).
- Ensure medical and psychological contacts and support.
- Ensure proper functioning and management of the next-of-kin "service".
- Responsible for health and crisis management support.

7.5.6.1 General Emergency tasks

In general the Emergency Action Group shall ensure that the following tasks are taken care of:

- Manning of the switchboard (when necessary)
- Establish secretarial support
- Ensure that telefax, and other means of communication are in an operational condition.
- Make a log for activities within the Emergency Action Group.
- Ensure that the Emergency Action Group is equipped with necessary equipment
- Register all outgoing / incoming information, copy and distribute to relevant personnel.
- Personnel from the respective administration, staff, etc. should be used to support the Emergency Action Group in handling next-of-kin matters, taking care of next-of-kin seeking information, and provide the necessary information and data required to undertake this function.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

7.5.7 Managing the Media

In the event of a critical incident that may attract media attention, only Fluenta's Chief Executive Officer or his deputy shall coordinate any media responses. No Fluenta personnel are authorised to speak with the media in relation to any critical incidents. Any contact with the media must occur via the MD as described.

7.5.8 Next of Kin

The HR Advisor has the overall responsibility to maintain the Next of Kin system in Fluenta.

7.6 Emergency Response

This emergency response section will address potential emergencies that can be expected in the workplace. Therefore, it will be necessary to perform a hazard assessment to determine hazardous (toxic, etc.) materials in the workplace, different kinds of hazards, and potentially dangerous conditions.

7.6.1 General

This Emergency Response section is a guide prepared to protect employees during emergency situations, including fires, first-aid situations, chemical spills, etc. In general, one of the first steps to take when faced with an emergency is to decide if you need help. If you have any doubts about your ability to handle the situation, call for help.

7.6.2 Evacuation of facilities

7.6.2.1 Decision to initiate an evacuation


The decision to initiate an evacuation is made by the Office/Facility Responsible person. When there is an immediate danger to personnel, such as fire, explosion, etc., the signal to evacuate the building will be activation of the fire alarm. The fire alarm shall then be activated by any person with knowledge of the emergency who will report the circumstances to the responsible Assembly point Leader at the Assembly Point.

7.6.2.2 General

All Fluenta facilities shall have their own local evacuation plan. The evacuation plan will contain description of evacuation routes, local first aid kits, fire hoses, fire- extinguishers, fire alarm locations, etc. These plans shall be posted throughout the buildings at logical locations (the base of stairways, next to elevators, reception area, etc.). Next to all evacuation plans, the Fire Instruction shall be located which will include a description of:

Emergency Assembly Point (EAP)

Name of the "Floor Warden" (Ref. 7.6.2.4 Evacuation Sweep).

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

Always be familiar with:

- Local Evacuation plans/Escape routes
- Locations of Emergency Assembly Point/Area (EAP).
- Evacuation Procedures/Guidelines

7.6.2.3 General Building evacuation

When an evacuation is necessary for your building or work area (or hearing the fire alarm):

- Stay calm, do not rush, and do not panic.
- Safely stop your work.
- Bring your personal belongings if it is safe to do so.
- Close your office doors and windows, but do not lock them.
- Use the nearest safe stairs and proceed to the nearest exit (in accordance to local evacuation plans) **DO NOT USE ELEVATORS.**
- Escort visitors and contractors to your Emergency Assembly Point (EAP).
- Proceed to the designated EAP.
- If it is evident due to smoke or other hazards that the normal assembly area is unsafe, then the Assembly Point Leader will choose an alternative location.
- Wait for any instructions from Assembly Point Leader.

Do not re-enter the building or work area until the EAP Leader instructs you to do so.

Note: Disabled persons should be given assistance in exiting the building, and meeting at the EAP.


7.6.2.4 Evacuation sweep

The relevant Manager of each floor (Floor Warden) is responsible to check his/her area to ensure that everyone has left the building. He/She shall properly check all offices, toilets, meeting rooms, canteen, etc. and ensure it's empty before leaving the building. Knock LOUDLY on closed locked doors and close (not lock) any open doors. Instruct any lingering occupants to evacuate the building immediately. If anyone refuses to leave, the Assembly Point Leader must be notified immediately upon exiting the building. Exit the building and meet at the pre-defined meeting point immediately. Report any emergency information to the Assembly point Leader at the assembly area.

The Floor Warden shall immediately report status to the appointed Assembly Point Leader at the assembly point. This shall be deputized if "Floor Warden" is not available.

7.6.2.5 Total evacuation

If no Corporate guidelines exist, each office shall prepare evacuation plans in case of a major incident that requires all staff to evacuate the facilities. (e.g. Earthquake, Terror, Major Fire, etc.). QA/HS&E Department will guide in the preparation of these plans.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

8 DEFINITIONS

ALARP expresses that the risk level is reduced to as low as reasonably practical – through a documented and systematic process so far that no cost effective measure may be identified.

Emergency Preparedness Technical, operational and organisational measures to be implemented under the management of the emergency organisation in order to protect human life, environment resources and assets in the event that hazardous or accidental situations occur.

Risk Expression of probability for and consequence of one or several accidental events.

Risk analysis Analysis which includes a systematic identification and description of risk to personnel, environment and assets.

Shall Verbal form used to indicate requirements strictly to be followed in order to confirm to the standard and from which no deviation is permitted, unless accepted by all involved parties.

Should Verbal form used to indicate that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others, or that a certain course of action is preferred but not necessarily required.

Accident An unwanted incident resulting in injuries to personal or damage to material assets or the environment.

Lost Time Accident An accident resulting in personnel injury, where the injured person(s) is **unable** to perform for his/her consecutive work (shift).


Non Lost Time Accident An accident resulting in personnel injury, where the injured person(s) is **able** to perform for his/her consecutive work (shift).

Near Miss Incident Any unwanted event or hazardous conditions, which under different circumstances, could have led to an accident.

Controlled document Documents which will be controlled by the QA department. Issued documents will continuously be updated to all copy holders of controlled documentation.

High-pressure Any pressurized substance (air, hydraulic, water, fluids, etc.) under pressure for test purposes or constant use which could cause severe injury to personnel and/or damage to property if a sudden rupture/burst was likely to occur.

Case Processor A person responsible to follow up a received case/incident report.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

A hazard: Is something, visible or invisible, that has the potential to cause injury, illness or property damage.

Probability: Is the relative frequency of the occurrence of an event

Level 1 – Emergency A minor, localized department incident that is quickly resolved with existing local Fluenta resources or limited outside help.

Level 2 – Local Emergency A local (individual office/workshop facility) emergency situation. These types of emergencies may require assistance from external resources

Level 3 – Regional / International Emergency

A type of emergency which may have impact on major parts of Fluenta`s organisation. These types of emergencies require assistance from internal and external resources.

Level 4 – Emergency (Disaster)


Any incident that requires widespread evacuation of the facility and/or the organisation. Level 4 emergency incidents generally require major internal/external assistance.

Emergency A sudden state of danger requiring response action.

Emergency Action Group A Management team established to coordinate/control activities related to emergencies

Emergency Control Room An area where assigned personnel of the Emergency Action Group and other designated emergency responders will assemble at in the case of an emergency.

Assembly point Leader Dedicated person in case of an emergency situation, who will be the contact person at the Emergency Assembly Point.

| | | |
|------------|--|---|
| Doc. nr: | 31.000.001 |  |
| Doc. name: | Health, Safety and Environment Management Manual | |

9 ABBREVIATIONS

ALARP As Low As Reasonably Practicable

FMEA Failure Mode and Effect Analysis

HAZID Hazard Identification

HAZOP Hazard and Operability Study

HS&E Health, Safety and Environment

QHS&E Quality, Health, Safety & Environment

RAC Risk Acceptance Criteria

SJA Safe Job Analysis

WE Working Environment

LTA Lost Time Accident

NLTA No Lost Time Accident

NMI Near Miss Incident

MD Managing Director

MSDS Material Safety Data Sheets

PPE Personal Protective Equipment

EAG Emergency Action Group

ECR Emergency Control Room

EAP Emergency Assembly Point

QMS Quality Management System

QRT Quarterly

COPY