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1.0 INTRODUCTION

This document presents TULCAN ENERGY RESOURCES LIMITED (TERL) Project Health Safety and Environmental (HSE) Plan.

This Project HSE Plan summarizes the HSE requirements for TERL and its subcontractors, including every HSE related activities and deliverables in accordance with the requirements of legislations, regulations, and TERL HSE requirements.

As a project deliverable, this Project HSE plan will serve as a “live document” for implementation and shall be reviewed as required to reflect changes in HSE condition.

1.1 LEADERSHIP AND COMMITMENT (HSE POLICY)

TERL Management is committed to ensuring that all works associated with the Project shall be carried out in a manner that shall not compromise the health and safety of Personnel, equipment as well as the environment were we operate. TERL management shall frequently visit the site in order to evaluate the HSE situations and performance level. TERL management shall demonstrate visible leadership commitment and accountability to the Project’s HSE policy and strategic objectives, and provide resources to implement a Project culture that embraces optimal HSE behaviour.

This will include:

- Communication of TERL HSE policy throughout the Project’s locations.
- Exercising leadership that exemplifies the fullest commitment to all aspects of health, safety, and environmental concern, both personally and from a corporate perspective.
- Through management example and directive, endorsing and ensuring the incorporation of considerations into all Project decision-making processes.
- Promoting performance as a value in every activity all through the project duration.
- Allocating adequate resources to the program for achievement of objectives and targets.

SEE APPENDIX A- POLICY

1.2 PROJECT HSE OBJECTIVE

- Basic minimum training and specialized training in line with regulatory standards. Required training (Induction) shall be given to all TERL personnel involved in the project.
- Ensuring that journeys are managed properly using the TERL Journey management system.
- Ensuring that adequate Health Scheme is in place in line with TERLs’ requirement.
- Ensuring that personnel are not only issued with the right PPE’s, but do make use of the issued PPE’s for the intended job as specified.
- Ensure proper investigation and follow up of accident near-misses and report findings to Project Manager, TERL Representative and relevant government regulatory bodies.
- Cascade incidents findings and recommendations to all workers for learning.
- Proper Hazard Management System in line with TERL’s Hazard and Effects Management Process.
- Ensuring that proper Waste Management Procedure is in place.

1.3 TERL TARGETS FOR THE PROJECT:

- Zero fatality.
- Zero security incident.
• Zero fire incident.
• Zero LTI (Lost Time Injury).
• Zero Near miss incident.
• 100% Hazard Identification Returns
• Zero road transport accident (RTA).
• Zero Marine transport accident
• 100% IVMS (In – vehicle monitoring system) decoding on monthly basis.
• 100% tracking of waste generated and disposed on site.
• ZERO Epidemics.

2.0 ORGANISATION AND RESPONSIBILITIES

2.1 DUTIES AND RESPONSIBILITIES

2.1.1 PROJECT MANAGER
• Directs and control all the activities of TERL in accordance with the policies, strategies and objectives laid down by the Company.
• Supervises the company’s organization and is responsible for appointing and defining the tasks for the different functions;
• Implements the general policy laid down by the company in respect of HSSE;
• With the back-up of the functional managers, supervises the correct implementation of the company’s HSSE Management System.
• To make sure that all HSE precautionary measures are in place and also to advise when necessary.
• Analyse HSSE costs in order to assess the adequacy and efficiency of the company’s HSSE Management System and define the objectives to be met for continuous improvement

2.1.2 CONSTRUCTION MANAGER
• Defines competencies required for management within TERL organization.
• Assures and provides adequate resources and time to manage the project.
• Has an understanding of TERL’s guidelines for the monitoring of in contracts.
• He has overall responsibility of all aspects of the Project;
• Represents the organization and maintains appropriate level of relationships with the TERL representatives;
• Supervision and administration of all subcontracts;
• Define the objectives, identify the constraints and plan project activities;
• Define the Project's organization structures;
• Supervise the application of the control systems in order to ensure achievement of time, cost and objectives;
• Implement the Management program;
• Supervision of purchasing, expediting, inspection and testing activities;
• Ensure the periodic and final reporting of all activities;
• The Project Manager shall be the focal point on this Project.
• To make sure that all precautionary measures are in place and also to advise when necessary.

2.1.3 HSSE COORDINATOR
The Coordinator shall be responsible for checking that the work is carried out in accordance with governing regulations and in-house standards. Must have attended appropriate training courses and received basic qualification relevant to TERL work, e.g. NISP Level 3

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His duties consist of, but not limited to:

- Preparations of work plans and procedures.
- Be on site regularly to monitor and advise on duties laid down in the HSE Plan and Site Specific Security Plan.
- Advise the Project Manager on matters related to HSSE.
- Be reasonably familiar with TERL’s Policies, documents and emergency procedures, particularly those relating to the work.
- To make sure that all precautionary measures are in place and also to advise when necessary.
- Liaison with Personnel of TERL in order to co-ordinate activities pertinent to HSE of personnel and equipment.
- Ensure proper use of Personal Protective Equipment (PPEs).
- Collection and updating of statistical data relating to accidents and incidents on site.
- Taking necessary steps in order to ensure that all personnel comply with regulations.
- All other functions spelt out in TERL Manual.

2.1.4 CONSTRUCTION SUPERVISOR

- Implements TERL HSSE Plan.
- Fulfils the pre-execution audit requirements on behalf of TERL Supervises work on site.
- Seeks formal approval from the Contract holder for any proposed deviations from or amendments to TERL or other plans.
- Attends HSSE or other regular meetings with the Contract Holder or his representatives.
- Control and co-ordinate all site activities in the contract;
- Correct and co-ordinate implementation of procedures and work programmes concerning the technical and maintenance activities;
- Planning and scheduling of the work force and equipment;
- Definition and updating of the detailed construction schedule, re-ordering of priorities, where necessary;
- Coordinate and verify the activities of his assistants, who are responsible to him, to ensure that every phase of the work is properly executed, checked and recorded;
- Preparation of data required for compilation of the Work-in- Progress Reports.
- To make sure that all precautionary measures are in place and also to advise when necessary.

2.1.5 SITE HSE OFFICER

The HSE Officer shall assist to analyze advice, monitor and ensure implementation of Project Plans, Procedures, and Programme. The main aim is to ensure awareness, coordinating and improving techniques towards boosting the plans. He shall facilitate and document daily tool box /monthly meetings.

Meetings, briefings and unsafe act auditing shall be some of the programmes to be implemented during such site visits and shall be documented when necessary and the copy sent to TERL Project Engineer

2.1.7 SITE NURSE-FIRST AIDER

The Site Nurse/First Aider shall among other activities do the followings;

- Administer First Aid as the need arises.
- Report to the Safety Officer all health hazards observed at site.
**TULCAN ENERGY RESOURCES LIMITED**

- Monitor health of all workers at site.
- In case of emergency, shall be alerted and attend to all injuries and refer to the retainer ship clinic in conjunction with the safety officer.
- Maintain the sick bay.
- Activate MEDEVAC procedures if need be.
- Replenish contents of First Aid Box as at when due.

SEE APPENDIX B – ORGANIZATIONAL CHART

### 3.0 SCOPE OF WORK

This scope covers the installation/construction of equipment and modules for the project, including all necessary tie-in construction works to existing facilities, civil, mechanical, electrical, instrumentation works, barging and logistics, warehousing, messing and offices, communication facilities, which form an integral part of the construction works of the Project.

<table>
<thead>
<tr>
<th>Task</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Mobilization</td>
</tr>
<tr>
<td>2</td>
<td>Site preparation</td>
</tr>
<tr>
<td>3</td>
<td>Mechanical/Piping works</td>
</tr>
<tr>
<td>4</td>
<td>Piling</td>
</tr>
<tr>
<td>5</td>
<td>Instrumentation, controls and electrical works</td>
</tr>
<tr>
<td>6</td>
<td>Civil and structural works</td>
</tr>
<tr>
<td>7</td>
<td>Commissioning</td>
</tr>
<tr>
<td>8</td>
<td>Demobilization</td>
</tr>
</tbody>
</table>

### 4.0 HAZARD IDENTIFICATION, RISK ASSESSMENT AND CONTROL

**Major hazards/risk and controls**

<table>
<thead>
<tr>
<th>Risk/Hazard</th>
<th>Risk Level (L, M, H)</th>
<th>Task (N/A, All, 1, etc.)</th>
<th>Controls (Standards, procedures, work instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land transportation</td>
<td>H</td>
<td>1, 7</td>
<td>Journey Management procedures</td>
</tr>
<tr>
<td>Electricity</td>
<td>M</td>
<td>3, 4</td>
<td>Electrical DEP</td>
</tr>
<tr>
<td>Manual handling</td>
<td>M</td>
<td>1, 2, 3, 4, 5 &amp; 7</td>
<td>Manual handling procedure</td>
</tr>
<tr>
<td>Lifting (Hoisting)</td>
<td>H</td>
<td>3 &amp; 5</td>
<td>Lifting &amp; hoisting procedure</td>
</tr>
<tr>
<td>Hydrocarbons</td>
<td>H</td>
<td>3 &amp; 5, 7</td>
<td>PTW/JHA</td>
</tr>
</tbody>
</table>
5.0 PROJECT HSE REQUIREMENTS

5.1 General HSE Requirements

- Valid DPR Permit
- Life Saving Rules
- Site HSE Rules
- Working hours
- Medical fitness of workers
- First aid training
- Incident reporting and investigation
- Stop work authority
- No work in the rain

5.2 Related Legislation and Regulation

5.2.1 Environment
TERL shall ensure and confirm that the Hazards and environmental effects associated with the work and work location have been identified and assessed, and that appropriate controls are in place in line with TERL and government regulations.


The existing and relevant legislation specifically targeted at Environmental management include:


5.2.2 SAFETY

To ensure safety in industrial activities, adequate rules and regulations are of prime importance particularly in the petrochemical world. Since majority of the raw materials and finished products of this industry are highly combustible materials, all activities should be conducted according to codes of standard practices.

There are numerous laws enacted by the government to ensure safety at work. The safety legislation in force includes:

3. Factories (Registration fees) etc. Regulations, 1991
8. Working in confined spaces & other special locations.

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9. Working with plant & equipment, portable tools, hand tools etc.
10. Colour codes, signs & notices.
11. Welding & cutting and related equipment.
12. Competent persons certification procedure
13. Permit to work system.

5.2.3 OCCUPATIONAL HEALTH

The occupational health of TERL workforce and contractors personnel will be managed in line with Laws enacted by the government and TERL’s standard Medical Fitness guidelines as mentioned below

1. First Aid Boxes Prescribed Standard Order -TERL
2. Foods and Drugs Act NAFDAC No 15 of 1993
3. Standard of Field Accommodation-TERL
4. Standard of Medical Fitness for Employees and Contractors-TERL
5. Standard Medical Fitness for Food Handlers (Catering Services personnel) - TERL
6. Smoking In Office Locations – TERL
7. Drugs and Alcohol- TERL

5.3 STANDARDS

5.3.1 Availability
List of TERL work procedures specific to the Project

- P.T.W/Complimentary certificates.
- Waste Management guideline
- Work at Height (Scaffolding, Slippery surfaces, Climbing / descending stairs, elevated work platforms).
- Land transportation (Journey management procedure).
- Marine transportation (Journey management)
- Confined Space Procedure (where required)

5.3.2 Safe Work Permits

- Permit to work (Hot or Cold)
- Complimentary certificates

5.4 Subcontractor Management

Sub-Contractors are required to follow the guidelines established in this Plan.

The following measures will be employed to ensure that HSE-MS requirements are followed strictly throughout the duration of the project.
Sub-contractors will execute all assigned tasks in accordance with the approved Plan for this project.
• TERL shall provide HSE induction and Life Saving Rule cascade before commencement of work to all subcontractor personnel
• Sub-contractor to submit a list of all equipment to be used and obtain TERL certification as required
• Subcontractors to provide evidence of competence for all specialized activities
• Continuous monitoring and supervision of all subcontractor activity

5.5 Plants and Equipment Management

All equipment shall be certified fit for use before mobilization to site. TERL shall ensure periodic maintenance checks are carried out.

5.6 Personal Protective Equipment (PPE)

Personal protective equipments (PPE) will be issued to personnel depending on the type of hazard exposure. A critical assessment of hazard suggests the appropriate PPE to be used.

PPE requirements for some specific jobs:

<table>
<thead>
<tr>
<th>S/NO</th>
<th>TYPE OF WORK</th>
<th>PPE REQUIREMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Electrical works</td>
<td>Eye protection, safety boot, rubber hand glove, helmet, coverall, hearing protection, face protection</td>
</tr>
<tr>
<td>2</td>
<td>Mechanical works</td>
<td>Eye protection, safety boot, leather hand glove, helmet, coverall, hearing protection, face protection</td>
</tr>
<tr>
<td>3</td>
<td>Lifting operations</td>
<td>Safety harness, Eye protection, safety boot, leather hand glove, helmet, coverall, hearing protection,</td>
</tr>
<tr>
<td>4</td>
<td>Working at height</td>
<td>Ladders, helmet, safety harness, coverall, eye protection, scaffold, safety belt</td>
</tr>
<tr>
<td>5</td>
<td>Chemical Handling</td>
<td>Eye protection, safety boot/Rain boot, rubber hand glove, helmet, coverall, Nose mask</td>
</tr>
<tr>
<td>6</td>
<td>Civil works</td>
<td>Eye protection, safety boot, leather hand glove, helmet, coverall, hearing protection, face protection</td>
</tr>
</tbody>
</table>

5.7 Waste Management

Methods and procedures for waste Management:
The Four (4) R’s (Reduce, Reuse, Recycle and Recover) system of waste management shall be applied to all classes of waste that shall be generated during the entire project.

Types of waste and disposal medium

<table>
<thead>
<tr>
<th>Item</th>
<th>Types of waste</th>
<th>Disposal medium</th>
<th>Tracking medium</th>
</tr>
</thead>
<tbody>
<tr>
<td>a.</td>
<td>Food waste</td>
<td>Disposed in client/Government approved site</td>
<td>Waste Consignment Note (WCN)</td>
</tr>
</tbody>
</table>
5.7.1 Waste segregation
All types of waste generated shall be segregated by separating them into different waste containers which shall be labeled for easy identification and disposal. Waste consignment notes shall be used to track the disposal of all generated waste.

5.8 Hazardous Materials Management
TERL shall ensure that all hazardous material shall be handled, transported and disposed in accordance with TERL and government regulation

<table>
<thead>
<tr>
<th>Chemical name</th>
<th>Special PPE or handling Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>DIESEL</td>
<td>Leather gloves, Respiratory Protection, Eye Goggles</td>
</tr>
<tr>
<td>GREASE/LUBE OIL</td>
<td>Leather gloves, Respiratory Protection, Eye Goggles</td>
</tr>
<tr>
<td>CEMENT</td>
<td>Leather gloves, Respiratory Protection, Eye Goggles</td>
</tr>
<tr>
<td>RADIOACTIVE SOURCE</td>
<td>Leather gloves, Respiratory Protection, Eye Goggles</td>
</tr>
</tbody>
</table>

6.0 HSE TRAINING
TERL shall ensure that all identified gaps are closed through capacity building and development of workers associated with the project, at all locations, undergoes a mandatory induction, competence training to ensure they are aware of the aims and requirements of the project and the plan for HSE Execution.

<table>
<thead>
<tr>
<th>Description</th>
<th>Applicable</th>
<th>Narrative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic HSE Induction/Orientation</td>
<td>✔️</td>
<td>Awareness</td>
</tr>
<tr>
<td>Lifting and Material Handling</td>
<td>✔️</td>
<td>Basic lifting and hoisting training</td>
</tr>
<tr>
<td>Emergency Response</td>
<td>✔️</td>
<td>Awareness</td>
</tr>
<tr>
<td>Fall Protection/Work at height</td>
<td>✔️</td>
<td>Scaffolding training/ awareness</td>
</tr>
<tr>
<td>Fire Safety</td>
<td>✔️</td>
<td>Awareness</td>
</tr>
<tr>
<td>First Aid</td>
<td>✔️</td>
<td>Basic Training/Awareness</td>
</tr>
<tr>
<td>Hazard Identification and Awareness</td>
<td>✔️</td>
<td>Awareness</td>
</tr>
<tr>
<td>Driver Education Programme</td>
<td>✔️</td>
<td>Training</td>
</tr>
<tr>
<td>Land Goal Zero</td>
<td>x</td>
<td>Training</td>
</tr>
<tr>
<td>Job Hazard Analysis (JHA) / PTW</td>
<td>✔️</td>
<td>Training</td>
</tr>
</tbody>
</table>

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7.0 HSE COMMUNICATION

In order for staff to be fully abreast on HSE matters, management has the following mediums with which HSE issues are fully communicated to the entire workforce:

1. HSE Induction
2. Scheduled meetings
3. Pep talk/toolbox meetings
4. HSE signs/notices
5. Safety Bulletins & Newsletters
6. Training and Workshop

7.1 HSE MEETINGS

TERL shall be responsible for the demonstration and participation in all TERL HSE Meetings with contractors.

Meeting Programme

The programme covers the duration of the contract.

<table>
<thead>
<tr>
<th>MEETING TYPE</th>
<th>PERIOD / FREQUENCY</th>
<th>ATTENDANCE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tool Box Meeting</td>
<td>10-15mins Before start of work/ daily</td>
<td>All work crew at various locations</td>
</tr>
<tr>
<td>General Meeting</td>
<td>45mins Morning hours, monthly at site.</td>
<td>All workers</td>
</tr>
<tr>
<td>Site HSE Meeting</td>
<td>Monthly</td>
<td>All workers</td>
</tr>
<tr>
<td>Progress Meeting</td>
<td>Monthly</td>
<td>Project Leaders (TERL/TERL)</td>
</tr>
<tr>
<td>Snr. Mgt Review Meeting</td>
<td>Quarterly</td>
<td>Senior Management</td>
</tr>
</tbody>
</table>

7.2 PROMOTION AND AWARENESS

7.2.1 Performance

- HSSE Performance board shall be provided for the project and will be placed in strategic location at the site that will be accessible to personnel.
- HSSE Performance shall be monitored, recorded and communicated on the board and to TERL daily.

7.2.2 Promotional Method

- TERL shall establish Incentive/Sanction Scheme as a Method of Motivation of Employees.
- Incentives as defined in the company HSEMS Incentive & Sanctions Scheme shall be given to HSE compliant workers on the spot during walkthrough inspection.
7.3 EMPLOYEE ORIENTATION PROGRAMME
There shall always be an orientation programme to conduct induction briefing for all new employees coming to site. The induction briefing will cover the following areas:

7.3.1 INDUCTION OF STAFF
All TERL site personnel and subcontractor personnel must undergo an induction program. The induction will serve as a preamble to this Plan as well as reinforcing TERL and TERL common objective of providing a safe place of work for the employees, sub-contractors, local communities, visitors and everyone affected by the operation.

The induction will cover the following:
- TERL HSSE Policy
- Accident preventive measures at work site
- Awareness on safe systems of work (PTW, JHA, TRIC, MS etc.)
- Journey Management (Road Safety / Land and Marine Transport)
- Emergency / Medevac Procedure
- Tool Box Meetings
- Safety Meetings
- Unsafe Act/Conditions reporting
- Hearts and Mind awareness (Behavioural Safety)
- The Life Saving Rules

8.0 EMERGENCY RESPONSE PLAN
The work site Supervisor has the prime responsibility for initiating the emergency response procedures in accordance with the flow chart shown below as quickly as possible.

POTENTIAL EMERGENCIES SITUATION FOR THE PROJECT
1. Fire out-break
2. Medical
3. Security (Kidnap)
5. Natural Disaster

See Appendix C. for Emergency Contingency Plan

8.1 Emergency Drill
Measure shall be put in place to ensure that personnel are acquainted with emergency response flow chart.

- Induction: all personnel shall be inducted on the emergency response and medical evacuation procedure. All potential emergency situations shall be highlighted during the induction.
- Training: Personnel shall be trained, retrained and rehearsals shall be performed to keep the disaster plan programme in good working order. All personnel shall be taught what to do in each type of disaster or impending disaster.
Drills: Coordinated drills shall be frequently carried out at regular intervals aimed at embedding response in the workforce and at the same time correcting deficiencies and unrealistic features of the emergency response flow-chart.

9.0 JOURNEY MANAGEMENT

To ensure that land journeys for the project. Project activities are conducted safely and with the necessary level of security and surveillance.

TERL management is committed to safe travels through polices and in the appointment of a journey coordinators who will manage all journeys. Effective vehicles, reduction of kilometer driven and reduction in personnel exposure will be applied for all journeys.

Details of the procedure to be applied for the management of all projects. Road and marine journey management during the execution phase is detailed in the Journey Management plan.

10.0 AUDITS AND INSPECTIONS

TERL shall implement an unsafe act /unsafe condition audit/inspection programme during execution of the project.

Constructive comments and feedback shall be made, documented and action taken by responsible parties. All recommendations from audit/inspections are collated to ensure action items are closed out and provide feedback mechanisms.

Scheduled Monthly inspections and audits shall be carried out by the Project management of TERL and the TERL Representative to ensure compliance.

A detailed yearly HSE audit and inspection plan shall be developed and signed off by the TERL HSSE Manager.

10.1 Equipment Inspection procedures

TERL shall ensure that her working equipment are fit for purpose and meet regulatory requirement. Pre-mobilization inspection and routine inspections shall be carried out as scheduled. Any known deficiency observed from any equipment shall be corrected before continue usage.

11.0 SECURITY PLAN

TERL is aware of the security situations in the Niger Delta areas of Nigeria and is very much committed to ensuring that adequate measures are in place to protect its employees, TERL, sub contractors and others who might be affected in the process of executing its activity. This site security plan covers security related issues that may be encountered during the execution of the project.

Key security hazards/risks are but not limited to youth restiveness, armed robbery, and theft of information, general civil unrest, and action by community workers. Details are provided in the TERL approved security plan.
### 12.0 HSE ACTION PLAN AND PERFORMANCE MONITORING

12.1 HSE Action Plan

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Action</th>
<th>Responsibility</th>
<th>Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Key hazard/Risk</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1 Working at height</td>
<td>• ½ day training for supervisors on working at height Guideline and Procedure</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Induction for all front line staff on working at height</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• JHA and toolbox talks for all works at height</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Erection and certification of scaffolds</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Inspection and approval of all fall arresting PPEs</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td>2. Pre-mobilization</td>
<td>Kick-off Meetings with TERL</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Develop and endorse Project HSE Plan</td>
<td>TERL/TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Engage community and obtain FTO</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Develop and sign-off security plan</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Review and confirm adequate work procedures</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td>3. Mobilization</td>
<td>Confirm contract specification of equipment, vehicles etc</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Confirm contract specification of personnel competence and experience</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Medical fitness test of workers including those subject to the fitness to work protocol</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Conduct and confirm HSE Trainings</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Carry out HSE induction/orientation</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Inspect and confirm accommodation and catering</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Review and approve journey management plan</td>
<td>TERL</td>
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</tr>
<tr>
<td>4. Site preparation</td>
<td>Obtain and confirm all required permits</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Build site office</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Housekeeping</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td>5. Work Execution</td>
<td>Obtain relevant permit to work (PTW)</td>
<td>TERL</td>
<td></td>
</tr>
<tr>
<td>Task</td>
<td>Frequency</td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>-----------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Develop daily task plans</td>
<td>TERL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Perform JHA for site activities</td>
<td>TERL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Toolbox talks with work crew</td>
<td>TERL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hold planned HSE meetings</td>
<td>TERL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Execute planned drills</td>
<td>TERL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implement audit plan</td>
<td>TERL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Decode and analyze IVMS reports</td>
<td>TERL/TERL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventorize waste generated and disposed</td>
<td>TERL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compile and report safety statistics</td>
<td>TERL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Report incidents, near miss, unsafe act/conditions and occupational illnesses</td>
<td>TERL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Investigate and share learning from incidents</td>
<td>TERL</td>
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</tbody>
</table>

6. **Demobilization**

<table>
<thead>
<tr>
<th>Task</th>
<th>Frequency</th>
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</thead>
<tbody>
<tr>
<td>Restore site</td>
<td>TERL</td>
</tr>
<tr>
<td>Evacuate material and personnel</td>
<td>TERL</td>
</tr>
</tbody>
</table>
### 12.2 HSE Performance Monitoring

Example HSE performance monitoring Indicators

<table>
<thead>
<tr>
<th>S/N</th>
<th>Leading Indicators</th>
<th>Plan</th>
<th>Actual</th>
<th>Lagging Indicators</th>
<th>Plan</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Premob activities</td>
<td>100%</td>
<td></td>
<td>Exposure Hours</td>
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<td></td>
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<tr>
<td>2</td>
<td>Adequate controls for key hazards</td>
<td>100%</td>
<td></td>
<td>Fatalities</td>
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<tr>
<td>3</td>
<td>Mobilization Activities</td>
<td>100%</td>
<td></td>
<td>Lost time Injuries</td>
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</tr>
<tr>
<td>4</td>
<td>HSE Trainings</td>
<td>100%</td>
<td></td>
<td>Total Recordable Cases</td>
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<td></td>
</tr>
<tr>
<td>5</td>
<td>Management Field inspections</td>
<td>100%</td>
<td></td>
<td>High Risk Incidents</td>
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</tr>
<tr>
<td>6</td>
<td>HSE Audits/Inspections</td>
<td>100%</td>
<td></td>
<td>Unsafe acts/unsafe conditions</td>
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<tr>
<td>7</td>
<td>Emergency Drills</td>
<td>100%</td>
<td></td>
<td>Kilometer driven</td>
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<tr>
<td>8</td>
<td>Compliance to work procedures</td>
<td>100%</td>
<td></td>
<td>Motor vehicle incidents</td>
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<tr>
<td>9</td>
<td>HSE Meetings</td>
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<td></td>
<td>Security incidents</td>
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</tr>
<tr>
<td>10</td>
<td>Stop work exercised</td>
<td>100%</td>
<td></td>
<td>Waste Generated disposal</td>
<td>100%</td>
<td></td>
</tr>
</tbody>
</table>
ATTACHMENT A

Policy Statement

HEALTH SAFETY SECURITY AND ENVIRONMENT (HSSE) POLICY

TULCAN ENERGY RESOURCES LIMITED (TERL) conducts business in a manner that does not harm people or the environment. This commitment is facilitated through a Health, Safety, Security and Environmental (HSSE) Management System which includes:

- Visible management commitment, effective communication and training to ensure environmental protection, and the safety and health of our employees and the community.
- Measurable goals promoting continual improvement toward zero incidents and the prevention of pollution.
- Line management accountability for HSSE matters and the individual contribution of all employees.
- Recognition by all employees and contractors that safety and environmental protection is a condition of employment and that they are responsible for their safety and the safety of those around them.
- Promoting a culture where Stop Work Authority is exercised freely and is valued as a proactive process to control HSSE risks and impacts.
- Integration of HSSE considerations, including identifying and controlling risks and impacts into our business decisions, plans and operations.
- Periodic audits and reviews of HSSE systems and performance.
- Compliance with applicable legislation, regulations and relevant industry standards.
- Providing appropriate resources to implement this policy.
- This policy being available to employees and the public.

Tulcan is a responsible corporate organization committed to the health and safety of people and the protection of the environment while supplying products and services in a safe and sustainable manner. We firmly believe this commitment adds value to our customers, employees and shareholders.

25.01.14

ADEYEMI ADIATU

GROUP MANAGING DIRECTOR
APPENDIX B

ORGANISATIONAL CHART

PROJECT MANAGER
TBA

HSE MANAGER
TBA

BASE HSE COORDINATOR
TBA

SITE HSE COORDINATOR
TBA

SITE NURSE
TBA

SECURITY OFFICER
TBA

SITE HSE OFFICER
TBA

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