



Oceanic Consultants

HEALTH, SAFETY AND ENVIRONMENT Policies
and Procedures

Intent of Management, Roles/Responsibilities
and General Safety

June 2009

I. INTENT OF MANAGEMENT

OCEANIC CONSULTANTS is committed to the welfare of our employees, our partners' employees, and any workers or guests who may be at our worksites. Protecting people, property and avoiding pollution to the environment are business priorities. We have established certain Health, Safety and Environment policies, procedures, practices and processes with the following purpose:

Activities in the workplace are performed without accident, injury or illness to people, loss and/or destruction of property or pollution to the environment.

We believe that no business objective is so important that it should be pursued at the sacrifice of any person's welfare. *Together* we can maintain a safe working environment by:

- Following all safety rules and safe work practices
- Providing and participating in appropriate training
- Understanding and mitigating risks
- Caring and watching out for each other
- Identifying and removing hazards
- Intervening in/reporting any observed unsafe acts
- Staying focused on the job at hand

Although we provide documentation and training to inform and educate workers to protect their health, safety and the environment, every possible working condition may not be covered and everyone may not perform safely. Therefore, the continuous cooperation of ALL workers is needed to ensure all operating procedures and work methods do not expose anyone to hazards, risk property loss or damage, or contribute to pollution to the environment. Good judgment and common sense are required to supplement any safety rules. If you observe any workplace condition or practice that you believe could risk the welfare of people, the loss of property or pollution to the environment, please report that condition or practice immediately to the safety coordinators for your location.

OCEANIC CONSULTANTS and its workers will comply with any building, facility or governmental regulations that apply to our worksites. If you observe any violation of the Company's policies, procedures, or practices, or violation of any building, facility or governmental regulations, please report those violations immediately to the safety coordinators for your location.

Houston Safety Coordinator: Steve Hill

Phone: 713 965 5100

Lagos Safety Coordinator: Oladapo Adeleye

Phone: 011 2341 461 6690

Health and welfare of everyone is each individual's responsibility! We expect everyone to follow OCEANIC's policies, procedures and practices.

Sincerely,

OCEANIC CONSULTANTS MANAGEMENT

II. GENERAL

A. Supervisory Responsibilities

1. All levels of supervision shall provide proper instruction and guidance in correct work procedures and be sure this is given to all employees under their supervision.
2. All levels of supervision shall inspect equipment and working conditions to ascertain that there are no obvious safety hazards.
3. All levels of supervision shall enforce the regulations contained herein which apply to the operation for which they are responsible.
4. All levels of supervision will investigate all accidents (not just injuries) to determine probable cause and, to recommend possible preventative measures.
5. Accidents reports are to be completed on ALL reported injuries. Failure to properly document injuries is totally unacceptable and will result in disciplinary action.

B. Employee Responsibilities

1. EACH EMPLOYEE MUST READ AND BE THOROUGHLY FAMILIAR WITH THE CONTENTS OF THIS MANUAL.
2. All employees shall follow safe procedures, render every aid to safe operations and report all unsafe conditions or practices immediately to his/her supervisor or proper authority.
3. Each employee shall give special instructions and assistance to new employees who are not familiar with the working conditions and safety procedures in doing their work.
4. Each employee shall report to his/her supervisor any accident and/or any injury immediately after it happens whether or not it requires the services of a doctor. The employee should also request the completion of an accident report.
5. If any employee has any doubt regarding his/her job, he/she should always consult his/her supervisor before proceeding.

C. Site Specific Safety and Emergencies

1. When on a client's property and required by that client, each employee must familiarize and follow the regulations and safety practices set forth by each individual client, and site before commencing the work.
2. When required, all personnel must be familiar, before commencing the work with those sites emergency procedures regarding fires, explosions, man overboard, platform evacuation or any other major emergencies and be prepared to take proper action in the event of such an emergency.

D. Smoking, Matches and Lighters

1. Smoking shall not be permitted in areas designated "No Smoking".
2. Smoking shall not be permitted in or around helicopter landing area and do not smoke while in flight.

E. Alcohol, Illegal Drugs, Weapons

1. The possession or use of alcoholic beverages or illegal drugs by employees on company premises, client premises or any other work locations is **STRICTLY PROHIBITED.**
2. The use, possession, transportation or any transaction of lethal weapons by employees on Company premises, client premises or any other work locations is **STRICTLY PROHIBITED.**
3. Prescription drugs must remain in their original container as prescribed by their doctor, and under the control of the person for which the drug was prescribed.
4. A drug screening will be administered along with medical treatment for all "on the job injuries." Any employee with a positive drug screen test result will be subject to disciplinary action up to and including discharge.

Note * See the Company's Employee Manual for the detailed policy on this subject.

F. Horseplay

1. Horseplay, wrestling or practical jokes are prohibited while on company property or during work operations in the field.

G. Aircraft

1. In some cases you may be required to ride in a helicopter for your transportation offshore. You must follow the pilot's instructions, as he/she is in complete charge of the helicopter and its passengers.
2. Remain clear of tail rotor at all times. Approach and disembark from the helicopter toward the front of the aircraft, always in sight of the pilot.
3. Walk - never run - to and from the aircraft.
4. Wear a life jacket while aboard the helicopter, if flying over water and do not remove it until the aircraft has landed. Ask the pilot if a life jacket or any other equipment will be required prior to departure.
5. Seat belts must be worn during the entire flight. Do not remove the seat belt until instructed to do so by the pilot.
6. Ear protection must be worn on all aircraft.
7. Helicopter passengers shall maintain a secure grip on lightweight articles such as hard hats, caps, jackets, raincoats and gloves to prevent them from

being drawn into the rotor blades. Loose wiping rags also can be drawn up into the helicopter blades.

8. You must notify your supervisor if you have a physical impairment or sickness that will impede riding any aircraft prior to your assignment **WHEN IN THE FIELD**.

III. PERSONAL PROTECTION

A. Clothing

1. Long pants or coveralls are required. The pant leg must cover the work boot or shoe.
2. Loose or ragged clothing will not be worn. Shirt tails, rags, etc. should be properly tucked in to the trousers.
3. All jewelry must be removed when working around rotating equipment, electrical circuits or sharp protrusions.

B. Safety Shoes

1. Safety shoes or boots shall be worn at all times while working and should be in good condition.

C. Safety Hats

1. Approved plastic hard hats will be worn by all employees, while engaged in work where there is a hazard of falling objects, or where there are low overhead hazards.

D. Gloves

1. Do not wear gloves around moving machinery and belts.
2. It is recommended that each employee have a pair of work gloves when handling steel, to protect against burrs, sharp edges, and similar material handling hazards.
3. Wear approved chemical gloves when handling chemicals.

E. Eye Protection

1. Proper safety glasses will be worn at all times. Goggles and face protection shall be worn by all personnel performing work with a recognized hazard to the eyes such as: wire brushing, buffing, chipping, grinding, cutting wire, welding, handling chemicals, acids or caustic, working on rusty or dirty chains or cable. Ask the question, "Can this job result in an eye injury?" If the answer to this question is "yes", eye protection is mandatory.
2. Never look directly at a welding arc and always shield your eyes from the rays, even rays being reflected from some other surface.
3. Safety spectacles are not safety goggles. Wear safety goggles over spectacles if work being performed requires safety goggles.

4. Contact lenses should never be worn at an onshore or offshore work location.
5. Adequate eye protection shall be utilized while sandblasting is being performed in the immediate vicinity.

F. Hearing Protection

1. Hearing protection is required in all posted "high noise" areas.
2. Warning signs are posted where protection is required.

G. Respiratory Protective Equipment

1. Employees must wear respiratory equipment whenever it is necessary to enter or work in an atmosphere known or suspected of containing harmful concentrations of gas, vapor, dust or mist, or when there is a deficiency of oxygen in the breathing air or the breathing air is above 140° F.
2. A specific type of breathing protection is required and provided for each contaminant and air condition you may encounter in your work. See your client's representative for the proper equipment to use.
3. Always be extremely cautious when working in or around "enclosed areas" such as barges, tanks, vessels, pipelines, sewer, sumps, pits, etc.

H. Work Vests and Lifejackets

1. United States Coast Guard approved life jackets/work vests will be worn:
 - . When working on barges.
 - . When transferring to or from a marine vessel.
 - . When working over water without handrail protection.
 - . When traveling in helicopters.
 - . During offshore emergencies including drills.
 - . At any other time deemed necessary by your supervisor, the customer representative or boat captain.
2. Work vests/lifejackets should be fastened, snugly fitted and in good condition.
3. Disembarking from a boat to a platform is under the control of the skipper. Follow the skipper's instructions. Always wear a personal flotation device.
 - . If you transfer by the swing rope, have both hands and arms free, catch the knotted rope high enough to clear the catwalk

on the structure when the boat is on the top of a swell, and swing to the platform by pushing off from the boat with your feet. Do not let the rope get between your legs. After you have landed on the platform release the rope for use by the next person and be alert to assist, if necessary, in making the landing. Always keep feet and legs clear of the platform landing face where the boat is bumping against the platform. Transfer your luggage and material by material basket and crane or by handing them from the boat to personnel on the platform.

This procedure is reversed when swinging from the structure to the boat. In other words, one should swing from the catwalk as the boat is beginning the rise from the bottom of the wave or swell and time yourself to have your feet on the boat's deck as it is completing its ascent.

Never release the swing rope until you are safely on the deck of the boat. If you miss the boat, continue to hold the rope. You will automatically return to the safety of the catwalk.

A deckhand **wearing a personal flotation device** must be on deck any time a personnel transfer is being made. The sea, wind and tide directions along with the physical abilities of the personnel are the factors used to determine when transfers can be safely made. IF FOR ANY REASON YOU FEEL YOU CANNOT TRANSFER SAFELY AT A PARTICULAR SPOT YOU SHOULD NOT ATTEMPT TO DO SO. NEVER LET THE BOAT SKIPPER, DECKHAND OR OTHER PERSONNEL INFLUENCE YOUR DECISION OR RUSH YOU. If you transfer by a personnel basket, position yourself on the deck of the boat as directed by the skipper or the deck hand. The basket will be lowered onto the deck from the structure or rig platform above. When it is on the deck, place your luggage and material in the bottom center of the basket. Then stand on the outside rim of the basket and grasp the upright basket ropes securely.

Keep your knees slightly bent or flexed, and be prepared for unexpected moves, particularly in rough seas.

I. Safety Belts

1. Approved safety belts or life lines must be worn by employees working at an unprotected level (six feet above ground level or working surface or greater) where no railings or other perimeter protection exists. Safety belts and life lines shall be carefully inspected before use and replaced when necessary.
2. Safety belts are to be tied off to independent lifelines or structure. One lifeline per man.
3. When in doubt, consult your supervisor.

IV. SAFE OPERATIONS

A. Safe Clearances

1. Personnel should never walk or stand under suspended loads. Use "tag" lines.
2. Personnel should stand at a safe distance from ropes or cables under strain. This distance should be sufficiently far away to prevent being struck by the rope or cable should it part.
3. Never walk around the tail rotor of any helicopter.
4. Always approach vehicles, movable cranes, fork-lifts, etc. from the sides. Stay in the operator's field of vision.

B. Safe Work Place

1. It is the responsibility of each employee to maintain a safe work place which is clean, orderly and hazard free.
2. Do not take dangerous shortcuts. Use stairways and ladders. Do not jump from elevated places.

C. Ladders and Stairways

1. Check the condition of ladder before use. Broken or damaged ladders must not be used.
2. Portable ladders must be equipped with safety feet or securely fastened to prevent slipping.
3. Short ladders shall not be spliced together to make a longer ladder. Aluminum ladders are not permitted in electrical areas.
4. All ladders must be tied off at the top or held by another person so that it cannot slip or fall.
5. Ladders must not be placed in front of doors which open toward the ladder.
6. When climbing or descending a ladder, employees shall face the ladder and have free use of both hands.
7. Never lean from a ladder to reach work. Move the ladder. The base of the ladder must be set back a safe distance from the vertical approximately one-fourth (1/4) of the working length of the ladder.
8. No more than one person shall be on a ladder at any time.