



## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

### **CASHES POLICY STATEMENT**

The Management of CLEDOP regards the promotion of occupational CASHES measures of paramount importance and as a mutual objective for Management, staff and communities at all level. It is the company's policy to do, that which is right to prevent injury, personal damage and property, pollution to the environment and protect everyone from foreseeable work hazard.

The Management has the following responsibilities:

- a) To ensure that competent persons are made to supervise all facets of operations.
  - b) To make available all necessary devices and protective equipment and ensure their use.
  - c) To adequately inform employees, and communities, when necessary, of any potential hazards arising from its operations.
  - d) To provide training and instruction to enable employees perform their duty or work safely and efficiently.
  - e) To provide and maintain safe and healthy working environment, machinery and equipment, taking cognizance of all statutory requirements.
  - f) Provision of First Aid, equipment and materials for use at all sites of operations and Offices.
- 2 The staff has a duty to co-operate and carry out this policy by: Reporting any faulty equipment and machinery to the General Manager and for making sure that they are put in good working conditions before their use.

The HSE activities of **CLEDOP** shall be organized, planned and executed in such a manner as to achieve the following:



## **NNPC OIL FIELD SERVICES & CLEGOP WEST AFRICA LIMITED JV**

- 1 Protect and promote the health of our work force and ensure their safety as well as that of members of the public.
- 2 Ensure the personal security of the workforce and that of the members of the public. Avoid injury to any member of the workforce and others who are either involved in or are affected by CLEGOP operations.
- 3 Protect the environment in which CLEGOP operates from pollution and all forms of degradation.
- 4 Seek the co-operation, and involvement of all employees with a view to meeting the above objectives.

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**MANAGING DIRECTOR**

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## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

### **STATEMENT OF SECURITY POLICY**

It is CLEDOP policy to identify, evaluate and manage the risks to personnel and property, arising from malicious practices, crime, civil disorder or armed conflict.

Implication of this policy:

1. If sufficient physical threats exist against our people and property we would expect the forces of law and order of the state to give us appropriate protection. The right to use force rests with the state. In pursuance of the mission and objectives of the security management system, line management will draw on the services of CLEDOP security department and, through the latter, the support of the CLEDOP supernumerary police unit, the Nigeria police force and other Nigeria security organizations as required, subject to (ii) and (iii) below.
2. CLEDOP will not operate in an environment where the continuous development of military or Para-military forces is required to comply with the above policy, except where development is at the instance of Government for protection of key national facilities.
3. Where the lives of personnel are at risk. CLEDOP recognizes that the development of military or paramilitary forces by the government, in support
4. Of the police and civil authorities, may be necessary for as long as is required to restore law and order if protection cannot be achieved by other means.
5. This policy will be pursued in compliance with CLEDOP guidelines on use of external security agents, so far as CLEDOP is able to exercise control.



# **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

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**MANAGING DIRECTOR**

## **INFORMATION SECURITY POLICY**

It is CLEDOP policy that all information used and generated in carrying out business activities, shall be managed as a corporate asset and be safeguarded accordingly so as to stimulate continuous business improvement and innovation.

Information security and access rights shall be defined and documented. Data custodians (Asset Holders) shall enforce information security standards, ensure the integrity of data within their area of responsibility and comply with all statutory requirements and CLEDOP group code of practice for information security Management

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**MANAGING DIRECTOR**

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## **NNPC OIL FIELD SERVICES & CLEODOP WEST AFRICA LIMITED JV**

### **EMERGENCY RESPONSE POLICY**

The response to any emergency within CLEODOP will be directed towards:

- Saving life
- Care for the injured
- Protection of the environment
- Limitation of damage to assets
- Defense of Throne Link good corporate image

CLEODOP shall provide the appropriate organization, facilities, procedures and training so that immediate co-ordinates action can be taken to manage the situation in line with the above.

Maintenance of emergency equipment shall receive high priority. Close liaison will be maintained with appropriate Government and industry organization and communities.

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## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

Regular exercise will be carried out to confirm effectiveness, and any necessary improvements made promptly so as to maintain our readiness at all time Managing Director.

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**MANAGING DIRECTOR**

### **HSE AND COMMUNITY STATEMENT**

CLEDOP will;

- Give the highest priority to the Health, Safety and Security of Employees. CLEDOP and members of the public
- Continually assess environmental impact and reduce it to a level as low as practicable
- Be sensitive to the needs of communities

All CLEDOP employees will plan and perform their activities in compliance with this statement.

**IF YOU BELIEVE THAT A JOB CANNOT BE DONE THIS WAY, IT SHALL NOT BE STARTED OR CONTINUED**

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**MANAGING DIRECTOR**

### **COMMITMENT TO COMMUNITY ASSISTANT'S POLICY**

CLEODOP will:

- Participate openly in regulatory development of community
- Integrate risk management in the business with relation to community assistant
- Have supervisions responsible for compliance with standards
- Have employees and CLEODOP who are competent to perform their job in line with policy
- Have staff and CLEODOP maintain an open dialogue with stakeholders
- Work in partnership with host communities on community development projects
- Ensure progress is measured against plans

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# **NNPC OIL FIELD SERVICES & CLETOP WEST AFRICA LIMITED JV**

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**MANAGING DIRECTOR**

## **COMMUNITY RELATIONS POLICY**

In order to pursue mutually beneficial relations with host communities, CLETOP shall

- Establish and maintain close relationships with all segments of the local population to better understand their concerns, needs and aspirations
- Continuously assess and abate the social and economic impact of all business activities and take needed preventive or mitigating measures
- Respond to formal community request in an appropriate and timely manner

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## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

- Bring relevant issues affecting host communities to the attention of appropriate authorities and other bodies that can be of assistance
- Manage the settlement of compensation for land acquired for company operations and damages in a demonstrably fair, accountable and transparent manner and in accordance with statutory provisions and approved procedures

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**MANAGING DIRECTOR**

### **COMMUNITY DEVELOPMENT POLICY**

In order to improve the quality of life in host communities CLEDOP all

- Establish a community development programmer which applies world standards of practice to serve its host communities

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## **NNPC OIL FIELD SERVICES & CLEWOP WEST AFRICA LIMITED JV**

- Work in partnership with host communities and where appropriate with government, donors, non-governmental organization, community-based groups and other stakeholders
- Encourage the full participation of host communities in project planning, implementation and monitoring
- Maintain communication with all social segments of host communities in order to address their needs
- Focus community development assistance on activities having high impact and broad benefits for the host population
- Pay special attention to the most economically disadvantaged social Managing Director.

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**MANAGING DIRECTOR**

### **TRAINING AND COMPLIANCE PROGRAM**

1. It is the policy of CLEWOP to always ensure ethics training on Code of Conduct: In carrying out their duties, staff shall adhere to the following code of conduct:

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## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

- All CLEDOP and their staff shall be dealt with in an equitable and business-like manner;
- The law and international regulations shall be fully complied with;
- Any unlawful act is unacceptable, whatever the justification. Good motives are not an excuse for committing illegal acts;
- Company staff should reject any practice which is, or might reasonably be deemed to be, improper;
- Staff are obliged to declare any potential, as well as actual, conflict of interest;
- All matters concerned with contracting activities shall be treated as confidential.
- That management shall always ensure that staffs and sub-CLEDOP are continuously trained on work ethics.

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**MANAGING DIRECTOR**

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## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

### **NIGHT SAILING POLICY**

CLEDOP disallows night sailing in all her swamp/marine operations. There shall be no night steaming of vessels/boats, except on emergency cases.

Night steaming on emergency cases must be approved by company and / or client's management.

Any violations will be met with serious reprisals.

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**MANAGING DIRECTOR**

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## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

### **OCCUPATIONAL HEALTH POLICY**

All staff shall be medically fit and shall remain medically fit throughout their employment.

CLEDOP shall maintain an insurance against any liability that may result in the event of any personnel suffering occupational disease or any impairment to health.

Company's retained Clinic shall handle all routine medical and medical emergencies.

“No Smoking” rules **MUST** be enforced.

Drug / Alcoholic addiction **MUST** not be encouraged amongst staff and suspected staff shall be subjected to screening / test to find out drug / alcoholic level in blood.

Health monitoring of all staff shall be a routine affair to ensure continued fitness of all staff.

First Aid box manned by a competent **NURSE**; **MUST** be provided for field operations.

Records of medicaments or injuries treated must be documented.

The enforcement of this policy shall be the responsibility of the HSES Manager.

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**MANAGING DIRECTOR**

### **SEAT BELT POLICY**

Safety belt is the employee's (i.e. Drivers and operators) best chance of surviving an automobile collision or accidents, and reduce the risk of moderate, serious or fatal injuries in a crash as much as 60%.

It is therefore mandatory that every worker whose work demands the use of safety belts to wear them especially while on company's business and must be properly bucked always, to safeguard against any one towards event.

All light crafts and heavy duty crafts such as trucks, tractors, forklifts, etc. must have seat belts fitted in them for use by the drivers or operators. The back seats of all light crafts shall additionally befit with seat belts.

The "NO SEAT BELTS, NO EXIT" rule shall be enforced at the gate or point of entry into the company premises or facilities by security officers. They should carry out visual inspections on any company or other vehicles entering or leaving premises to ensure all occupants comply with the directives.

HSE officers are empowered to stop any operations wherein there is an obvious breach of this policy. Foremen, supervisors and other members of line management shall monitor and ensure that everyone in company owned vehicles fastens his or her seat belts as required.

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## **NNPC OIL FIELD SERVICES & CLEODOP WEST AFRICA LIMITED JV**

Appropriate disciplinary action may be taken against any staff that violates this policy directive.

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**MANAGING DIRECTOR**

### **LOCAL LABOUR POLICY & PLAN**

1. It is the policy of CLEODOP to continue to identify with the economic aspiration and manpower development needs of the communities where it operates part of this identification is our commitment to employ nominated / certified youths of such environment with proven integrity in our operation.
2. CLEODOP shall ensure that only youths actively engaged in operation are paid and shall also ensure that such youths are trained and absorbed into the system depending on available resources – time and opportunities. This policy of ‘NO WORK, NO PAY’ shall apply to all categories of workers including local labour.
3. CLEODOP shall ensure strict suspension of local labour like other categories of personnel in order to achieve in production, HSES & CA and Management.

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# **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

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**MANAGING DIRECTOR**

## **PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY**

It is the policy of CLEDOP to provide relevant and high quality personnel Protective Equipment (Coveralls, Safety foot wears, hard hats, Head gloves etc0 for all persons engaged in the operations.

CLEDOP shall continue to enforce effective use and maintenance of available Personal Protective Equipment, carry out regular condition audit and replace defective ones when necessary.

HSES & CA officers and Supervisors shall be responsible for maintaining records of Personal Protective Equipment in stock, and allocated to personal responsibility.

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**MANAGING DIRECTOR**

### **TRANSPORTATION POLICY**

CLEDOP shall ensure safe movement of her human and material resources from one point to another. To achieve these policy objectives, the company shall, depending on the mode of the transport water, land and air, use equipment (watercraft Aircraft, vehicle etc) of high integrity and fit for the said purpose

Stationery and safety regulation including 'Non Night Sailing' rule as it concerns transportation shall be complied with, trained, competent and certified operating crew shall be provided to handle transportation equipment.

Regular and routine inspections/checks of transport equipment, its accessories and other facilities shall be carried out to re-affirm their technical integrity.

The use of corporate journey management guide shall remain mandatory for all movements.

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Every personnel are expected to co-operate with transport and safety departments in the implementation of this policy.

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**MANAGING DIRECTOR**

### **LIFTING POLICY**

CLEDOP believes that every lifting task be carried out in such a way as to avoid damage of property or injury to personnel.

The company shall ensure routine audits (inspections/check) of lifting equipment, accessories and facilities at all times.

All lifting rope shall be regularly, tested and tagged for easy identification

All identified deficiencies (if any) shall be rectified without delay

Safe lifting procedures including analysis of weight of lead and safe working load (S.W. L.) of equipment must be carried out before commencing any lifting activity.

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Competent operators and signalmen shall be responsible for evacuating lifting task

Prompt reporting of faults shall be encouraged

Every personnel is expected to be guided accordingly.

**MANAGING DIRECTOR**

## **SECURITY POLICY**

The protection of the human, material and other resources used in our daily operations shall continue to be given priority attention.

The company shall employ the services of full time (day & night) energetic and trained men for surveillance purpose in our entire site and in transit. The services of relevant Government armed security agents shall be used to protect company's personnel and property, when necessary, to support corporate and internal security arrangement.

The surveillance term shall monitor movement of company's personnel, property and other persons in and out of the company's work areas.



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Personnel and materials in transit shall also be provided with maximum protection, escort shall be provided for designated journeys.

Corporate security emergency plans and procedures shall be strictly adhered to all times

Every worker shall participate fully in all drills and activities aimed at developing and sustaining high security consciousness.

The company shall comply with relevant Government and client rules and procedures on security issues.

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**MANAGING DIRECTOR**

### **COMMUNITY AFFAIRS, SAFETY, HEALTH, ENVIRONMENT AND SECURITY (HSES & CA)**

CLEDOP mission is to nurture and sustain a highly technically oriented business, through accepting responsibilities that can lead to the contribution in knowledge, skills, accomplishments, satisfactions, and efforts to the society. Management is committed to nurturing and sustaining the health, safety and security of her staff, equipment and environment. To accomplish this, management facts there is nothing more than making sure that:

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## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

- We develop safe work methods, and make them appealing to employees
- All equipment, tools and machines are maintained in good repair.
- Encourage and develop a good relationship with our host communities
- Be committed to the nurturing and preservation of our environment.

Management is committed to nurture and sustain SAFETY

Employees and visitors in addition should realize that the existence of accident is a proof of a wasteful operation that destroys the corporation mission. The company also recognizes the hazardous nature of its operations – both oil and non oil related and the adverse consequences of its failure to observe, check and control or completely eliminate the acts and conditions that could result in accidents or incidents.

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**MANAGING DIRECTOR**

## **ENVIRONMENTAL POLICY**

CLEDOP Believes that our natural environment, which is of vital importance to all-living things must be protected at all times.

We shall, in pursuance of our technical objectives, recognize the significance of environment by conducting our activities in such a way as to achieve maximum protection of the

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## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

environment. We shall also put in place necessary measures aimed at rectifying the environment, when unavoidable damage is done.

Audit of work areas shall form an integral part of our routine site audits.

Environmental Impact Assessment (E. I .A) shall be done on as needed basis. Prompt reporting, investigation and follow up of negative interference with the environment shall be effected without delay.

All workers shall participate in activities aimed at developing and sustaining awareness of the need to protect and rescue work third party environment.

The company shall follow strictly all relevant clients' and Governmental regulations on the environment.

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**MANAGING DIRECTOR**

## **SMOKING POLICY**



## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

Smoking of any sort is injurious and harmful to human health. Many lives are either shortened or lost yearly due to smoking. Also, many unplanned fires resulting in immeasurable loss occur due to smoking.

To check this danger, CLEDOP prohibits smoking in all work sites and public places.

Any breach of this prohibition shall not be tolerated.

Also, smoking is not only injurious to health but also a potential safety hazard. Smoking in public places exposes non-smokers to health related hazards and it is the duty of CLEDOP to protect employees from unnecessary exposure to hazards.

The smoking of cigarettes or pipes is prohibited in all installation construction sites. It also includes all conference / meeting rooms, corridors, public areas and slated offices, unless otherwise agreed between all occupants of such offices.

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**MANAGING DIRECTOR**

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## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

### **EMERGENCY RESPONSE POLICY**

The objectives of every emergency response shall be to:

- Consolidate existing cordial relationship with host communities / Clients and to save others live.
- Assist the injured
- Reduce damage to client or company's resources and environment
- Defend corporate integrity.

All system strategies and procurements necessary to achieve these objectives shall be well coordinated

Reasonable attention shall be given to the development and sustenance of relevant resources toward the achievement of defined objectives. All personnel shall participate fully in all activities planned towards these objectives.

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**MANAGING DIRECTOR**

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## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

### **WASTE MANAGEMENT POLICY**

CLEDOP recognizes that waste (liquid or solid), generated from its activities can consolidate hazards to the environment and to the health and safety of personnel and the generated public.

To eliminate such hazards, the company shall, before the environment of any given task, assess the source, types and quantity of waste that shall be generated and ensure the use of conventional / acceptable methods and resources in the collection, handling and disposal of such waste record of waste generated and disposal shall be kept.

Services of environment and waste management consultants shall be utilized, when necessary. The company shall also monitor evacuation procedures and ensure that the waste evacuated is disposed of at approved dumping areas.

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# **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

**MANAGING DIRECTOR**

## **DRUG, ALCOHOL & WEAPONS POLICY IMPLEMENTATION STRATEGIES**

For the interest of maintaining safe, orderly and efficient operations, illicit narcotics and related materials like alcohols and other dangerous drugs and weapons should not be harbored by the company employees. .

This rule applies to all operations and locations on 24 hrs. basis.

CLEDOP will conduct periodic unannounced searches and screening on employees personal effects and lockers to ensure that no one is in possession of such illegal or unauthorized items.

Employees will be required to submit themselves for periodic checks/test for alcohol and drugs (URINE ANALYSIS or BLOOD test) or when specific circumstances warrants, workers will be tested according to DOT regulations for alcohol.

If a suspected worker's urine/blood test positive for alcoholism such a worker will be rehabilitated by counseling and treatment and will be disallowed to perform safety sensitive duties. Where such a worker indulges in same unsafe act again, then the termination penalty will be applied.

Employee may be subjected to voluntary searches prior to transportation to and from work locations and at all times on site, warehouse, yard, jetty, company premises or house boats.

In the event the company discovers such illegal unauthorized items in the possession of an employees, such item and / or materials **MUST** be reported and released to appropriate law enforcement agency followed by stringent reprisal on such victim with termination of appointment.

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**MANAGING DIRECTOR**

### **DRUG AND ALCOHOL ABUSE POLICY**

CLEDOP recognize its responsibility as an employer to ensure the health, safety and welfare of its employees and others at work on the client's jobsite. The maintenance of a safe working environment on the jobsite requires the exercise of special care and attention all employees have a special obligation to take reasonable care for the safety and health of themselves and others.

#### **Drugs and Alcohol on Site**

In the interest of safety, CLEDOP shore prohibits the possession, distribution or use of controlled drugs not issued on prescription or alcohol or misuse of pharmaceutical preparations by any employee on any client's jobsite, or reporting for work under the influence of such items.

CLEDOP will do everything in its power to detect and prevent the possession, distribution or use of drugs or alcohol on the client's jobsite.

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## **NNPC OIL FIELD SERVICES & CLEDOP WEST AFRICA LIMITED JV**

Any CLEDOP employee found in contravention of the above policy shall be liable to disciplinary action up to and including summary dismissal.

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