



POLICY MANUAL

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**CHAGUARAMAS TERMINALS LIMITED
HSE POLICY MANUAL**

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HEALTH, SAFETY & ENVIRONMENT POLICY STATEMENT

It is the policy of Chaguaramas Terminals Limited that the health and safety of its employees, contractors and all users of our facilities shall be of primary importance at all times, while at the same time it shall operate to minimize any impact its operations may have on the environment.

It is our responsibility to establish, implement and maintain health and safety management systems to ensure compliance with the requirements of this policy and any applicable regulations.

Our objectives are to:

- Provide safe places of work and healthy working environments for our employees, contractors and users of our facilities.
- Reduce and ultimately prevent injuries at work places by developing safe working practices, training employees in the practices and monitoring the results in each department.
- Promote health, safety and environmental protection as an integral part of the duties of management along with the education of all employees.
- Supply appropriate information, instruction and training to promote a high degree of awareness of health, safety and environmental concerns and the responsibility of each employee to prevent injury to themselves and others.
- Comply with all laws and regulations covering occupational health and safety and the environment.
- Develop and implement policies and procedures designed to promote safe working practices and environmental protection and encourage healthy and safe operating conditions in all companies.
- Implement practices and procedures for the use, handling, storage and transportation of materials and substances and to eliminate discharges and omissions that could harm the environment.

MS. BERNADETTE MOORE
PORT MANAGER
CHAGUARAMAS TERMINALS LIMITED.

DATE

HEALTH, SAFETY AND ENVIRONMENTAL (HSE) POLICY

1.1 HSE Management Program

The Company shall:

- Comply with local regulations.
- Ensure that all personnel understand their specific HSE responsibilities.
- Encourage all personnel to take an active part towards the improvement of the HSE program.
- Ensure that all managers and supervisors actively carry out the intent of the HSE policy.
- Work with and contribute constructively to HSE initiatives within the industry.
- Conduct HSE audits of the Company activities on an on-going basis and publish.
- Continue to comply with the governing environmental and health regulations, and where appropriate, reducing waste, emissions, and discharges.
- Provide employees with required HSE training.

The Company shall prepare and implement an HSE plan to facilitate the procedures listed above. This HSE Procedures Manual is a record of learning about how best to prevent accidents and injuries. Not every hazard that occurs in daily activity is included, but areas of greatest exposure are addressed.

MANAGEMENT RESPONSIBILITY

2.1 Management Responsibility

The General Manager is ultimately responsible for the Company's HSE performance. He shall ensure that all personnel, who manage and are involved in operations, comply with the HSE aspects of the Program.

2.2 Supervisor Responsibility

Although the success of any safety program requires the combined efforts of management, supervisors, and the worker, the supervisor is the key man. It is the degree to which the supervisor applies the intent of the program and the principles of safety that governs the success of this program. Safety is an area of mutual interest between the supervisor and the worker, and the supervisor must lead the way in developing the HSE program. Some of the supervisor's responsibilities are:

- Always set a good example for safety.
- Give adequate safety instruction to each and every new employee.
- Ensure the understanding by all employees that the violation of established safe work practices is a violation of company rules.
- Promote the proper use and care of protective equipment on each job.
- Promptly report all injuries to the Operations Manager or designated Safety Officer.
- Conduct routine safety inspections of his area for unsafe conditions and procedures, and ensure the proper use and maintenance of protective equipment.
- Initialize and forward all necessary accident reports to the Operations Manager or designated Safety Officer, such as: Accident Report, Near Miss Reports, Unsafe Condition Reports, etc.

2.3 Security & Safety Manager

The coordination of the company's HSE program shall be the responsibility of the Security & Safety Manager. Duties include:

- Advising and making recommendations to all supervisory personnel in the company.
- Monitor the overall safety program and help identify critical areas.
- Manage and comply with local and industry specific safety and environmental reporting requirements.
- Keep management informed of the safety performance of the various divisions and recommend appropriate actions to improve performance.

- Develop and implement safety-training programs.
- Administer and report to management on the status of workers' compensation claims and property damage insurance claims.

2.4 Employee Responsibility

Chaguaramas Terminals Limited management and supervisors expect the individual employee to cooperate in every respect with the company's safety program, so that the day-to-day operations may be carried on in such a manner, as to insure the safety of himself, his fellow employees, the client and company property. Therefore, each employee is charged with the following responsibilities:

- Observe all safety rules and regulations.
- Report any unsafe conditions or practices to your supervisor.
- Know how to perform jobs assigned and perform them properly.
- Do not undertake any job you do not understand--ask your immediate supervisor if there are any questions or any doubt.
- Wear and use all safety equipment required by the job to be performed.
- Participate in safety meetings held by your supervisor.
- Report all injuries immediately to your supervisor.
- Cooperate with supervisor when injury and accident investigations are being made so that accident causes can be determined and corrective action taken.
- Report any and all defective tools or equipment immediately.

2.5 HSE Meetings

Regular HSE meetings shall be held at all company work sites in accordance with Company policy. The frequency of the meetings will be contingent upon the particular activity or risk, and or client requirements. Tailgate meetings will be held before the start of each shift, and whenever the work process changes significantly. Routine safety meetings will be conducted at least once fortnightly.

2.6 Internal Audit

The Company shall conduct internal HSE audits in accordance with Section 11 of this manual, to ensure that all aspects of the HSE management system are being adhered to.

2.7 Management Review

The Company HSE Management System shall be subject to regular review by management personnel. These reviews will take place every four months and will be documented and shared with all managers having responsibility for the HSE Program. All recorded accidents and near misses will be reviewed by upper management weekly.

LEGISLATION

3.1 HSE Legislation & Industry Compliance

The company shall comply with all relevant local, industry specific regulations.

The Company considers the following recognized organizations regulations, guidelines, and additional materials relevant to the Company's operations:

- Occupational Safety and Health Administration (OSHA)
- United States Coast Guard (USCG)
- International Maritime Organization (IMO)

The company shall comply with relevant local and international shipping regulations. All visiting vessels will also be required to adhere to these regulations in conjunction with the Company HSE Program.

HSE DOCUMENTATION & RECORDS

4.1 HSE System Documentation

The HSE Program is comprised of the following documentation system:

- The HSE POLICY Manual which states the Company's policy and objectives, and which defines the method by which the Company shall comply with the overall intent of the HSE Program.
- The HSE Procedures manual, which has been developed for those activities posing the greatest risk to health and safety. These procedures define responsibilities and actions to be taken to minimize the risk.
- The Job Safety Analysis (JSA) is a series safe work instructions to define each step of a particular activity performed within the company. Also included in this area are those recognized documents that complement the Company HSE program such as the audit form and the safety procedure manual.
- The Company records and forms (accident reports, Investigation report, Vehicle Accident Report) which support and document compliance with regulations and client requirements.

4.2 Documentation Control

The Security & Safety Manager shall be responsible for the control and maintenance of HSE documents. This includes filing the annual and monthly reports, environmental reports, client reports, and Company statistics. HSE records will be kept on file in accordance with local law and industry standard. The period of retention of all HSE documents will be in accordance with local regulations. All revisions and updates will be the responsibility of the Safety Officer.

4.3 Management of Change

The company operates in a business environment where change is inevitable, as a result of technology and areas of operations. Each change may introduce risk to the Company, which can impact the HSE performance. The Company shall introduce procedures as the need becomes apparent to identify, monitor and control change, to ensure that risks are kept to an acceptable level. These procedures will be documented in the HSE Procedures Manual and disseminated to all affected employees.

Any change associated with a specific operation will be approved by the onsite supervisor, in conjunction with, the Port Manager. The supervisor in charge of the operation in conjunction with the operations manager will have the authority to remove personnel who do not comply with the standard operating procedures, including safety. Any change associated with equipment, as regards to safety, must be approved by the Port Manager.

HEALTH, SAFETY AND ENVIRONMENTAL PROCEDURES

5.1 General

All company operations shall adhere to the HSE Procedures Manual. Health and safety guidelines, safety rules and client regulations must be taken into consideration. Where there is a conflict involving operational requirements, the more stringent of the two safety rules will take precedent. If a conflict involving an HSE practice cannot be resolved the appropriate manager must be notified immediately.

5.2 Health

It is a company policy that all employees pass a medical examination, work fitness evaluation, and random drug screening. Employees may be required to have a medical examination on other occasions when it is job-related and consistent with business activity. Such occasions may arise when there is a potential for exposure to toxic or unhealthful situations, or when there is a question concerning an employee's ability to perform job duties.

5.3 Substance Abuse

Compliance with the Company's Drug & Alcohol Free Workplace Policy (HSE Procedures Manual) shall be a condition of employment. We are committed to a drug & alcohol free workplace. This is achieved by the maintenance of an active anti-drug and anti-alcohol plan. Any on-duty employee (or contractor) with a detectable level of alcohol, drugs or controlled substances is prohibited from performing service for the Company and will not be permitted to remain at work.

5.4 Safe Work Practices

Field employees work in an environment of potential risk from dangerous machinery, materials, fire, weather and other conditions. Safe working practices must be followed at all times. Safety procedures and guidelines of particular importance are:

- Chaguaramas Terminals Limited Procedures Manual
- Client Safety Procedures Manual

5.5 Minimum Rest Period

Personnel may work no more than 16 continuous hours. This time shall commence at the initial time of arrival on the work site, and shall include all standing by time as well as participating in operations or, any combination of same. After 16 continuous hours of performance such persons must be provided a minimum of 10 consecutive hours away from the work site and engaged in no alternate work activity.

5.6 Personal Protective Equipment (PPE)

The use of PPE shall be in compliance with local and industry related regulations. Personnel shall be issued the necessary PPE for the operation to be performed. Employees will also receive training in accordance with OSHA PPE regulations consisting of: limitations of PPE, donning, maintenance, inspection, and when to wear the PPE. All PPE shall meet ANSI standards.

Use of PPE will be mandatory and under the control of the on-site supervisor as outlined in the HSE procedures manual.

5.7 Smoking/Non-Smoking

Our buildings are smoke free areas. Other work places utilize designated smoking areas for employees to smoke. The on-site supervisor will have information regarding the smoke free areas and appropriate signs shall be posted.

ENVIRONMENT

6.1 Environmental Protection Plan

The company recognizes and is committed to promoting good environmental practices. The company in accordance with its Environmental Policy, Waste Management, and Pollution Prevention Plan will:

- Ensure that all waste materials are stored and disposed of according to regulations.
- Recycle and use recyclable materials when possible.
- Use fuels and chemical that are environmentally acceptable.
- Minimize waste by introducing a waste free process, where possible.
- Utilize cost effective solutions for cooling and lighting requirements.
- Conduct operations in such a manner as to minimize the impact on wildlife.

Please refer to:
HSE Procedures Manual

RISK CONTROL

7.1 Risk Assessment

The Company shall identify and document HSE risks in order to prevent and control the risk. As a minimum, the risk assessment will include consideration of the following:

- Nature of work
- Location of work
- Potential for exposure to worksite hazards
- Potential consequences of incident (environmental, legal, or delay in operations).

In some cases the risk or hazard can be identified by observation. In other cases, measurements such as noise levels, or gas detectors may be necessary to determine the level of risk. Emphasis will be placed on areas of operations or procedures that are identified as having the potential for greatest severity.

7.2 Risk Control

When risks or hazards have been analyzed and assessed, decisions can be made about control measures, which must be taken into account. The following risk control principles shall apply:

- Eliminate or minimize the risk by substituting safer operational procedures.
- Use engineering controls.
- Minimize the risk by the use of personal protection and equipment.

Employees involved in these areas of operations will receive appropriate HSE training, participate in site-specific safety meetings and review job safety analysis (JSA's) that apply to the particular risk or hazard, on a regular basis.

EMERGENCY PROCEDURES

8.1 Emergency Procedures

The company shall establish emergency procedures at all work locations. These shall define specific responsibilities for the management of a response to an emergency. The company shall also prepare interface documents linking the HSE emergency procedures to its client vessels and where appropriate, to the client to ensure that responsibilities are known.

The company shall provide training in these procedures to all relevant personnel in accordance with the HSE Procedures Manual and Section 10 of this manual.

8.2 Emergency Drills

Emergency drills shall be held monthly, and documented. These drills will consist of man over board (dock side), fire drills, spill containment drills, and HAZMAT drills.

CORRECTIVE AND PREVENTIVE ACTION

9.1 Corrective and Preventive Action

Corrective and preventive action shall be taken at any stage of an activity to eliminate, or reduce to an acceptable level, risk to the health and safety of the Company's employees and other persons for whom it is responsible. This includes the risk of damage to the environment and harm to wildlife.

A formal corrective action report may be initiated as a result of an internal HSE audit, or in response to an HSE problem identified in the normal course of business.

TRAINING

10.1 Training

Training is an essential part of the Company's HSE management system. It is the Company policy that all employees shall be provided HSE training appropriate to their employment. The responsibility for staff training is that of the Department Managers. The Security & Safety Manager will assist and counsel Department Managers in the HSE training matters.

The Company shall provide:

- Training to cover all levels of staff.
- A system for the identification of training needs.
- Analysis of special training needs.
- HSE refresher training on a periodic basis.

10.2 Safety Orientation

All new and contract employees will receive an HSE orientation which includes familiarization with the HSE Procedures Manual. This orientation program is supplemented with HSE training, which is appropriate to the level of employment.

The orientation will provide employees with basic practical understanding of the company's safety requirements, the general hazards and risks, and accident and emergency procedures that apply to their specific work location.

Employees will be required to attend all safety meetings pertinent to their area of operations. A supervisor will conduct the safety meeting. The contents, date, and who attended will be documented on a Company safety meeting roster form.

10.3 First Aid

All employees will be trained in first aid and CPR. Refresher training shall be provided bi-annually. The company shall undertake to maintain an acceptable stock of first aid supplies and equipment for emergency use. This shall be the responsibility of the Security & Safety Manager.

10.4 Fire Fighting

All employees will receive training in fire fighting techniques and equipment to address the fire safety concerns at the company's facility.

10.5 Water Survival

It is Company policy that all employees working over water undergo water survival training.

10.6 Defensive Driving

The Company supports and encourages defensive driving. All employees required to drive a Company vehicle will be required to participate in a Company sponsored defensive driving course.

HSE MONITORING AND REPORTING

11.1 General

The Company's annual HSE Plan shall outline its proposed actions for the year ahead and specific targets for HSE management and performance. The Company shall maintain a hierarchy of reporting to ensure that HSE related issues are monitored at all levels of the organization.

The HSE performance shall be addressed and published in the following format:

- HSE meetings
- Quarterly management review
- Annual Managers meeting

11.2 HSE Audits

Audits shall be conducted on a periodic basis. The results of these audits shall be documented in accordance with the Company documentation plan – Section 4 of this manual.

Audits shall be conducted by appropriately trained personnel. Specific jobsites will be audited. Some of the potential areas subject to audits will be workshops, material storage areas, and the office environment. The Safety Officer will assess the audit results and forward to management, who shall take prompt action to correct any HSE deficiencies. Responsibility for corrective actions will be assigned and documented.

11.3 HSE Statistical Data

The Security & Safety Manager will be responsible for compiling and reporting of the statistics, and keep management abreast of these statistics on a regular basis. These statistics are available to clients by request.

11.4 Incident Reporting

The Company shall require that all HSE Incidents be reported immediately. Incidents must be turned into the respective supervisor for review and forwarded to the Security & Safety Manager. These Incident Reports will be kept on file in accordance with HSE Documentation & Records policy of this manual.

APPENDIX

12.1 Chaguaramas Terminals Limited.

Company Organizational Chart

