



CONTRACTORS SAFETY POLICY

Introduction

At CCC (UE), safety is not just a priority, but a core value embraced by every employee and incorporated into our business processes.

Therefore, this document has been made in order to prepare our Contractors to act according to legal requirements as well as the requirements imposed by CCC (UE).

All requirements set out should be considered as minimum requirements and Clients on different projects may have additional requirements. Any additional Client requirements will be handed out to the Contractor.

Abbreviations

ALARP	as Low as Reasonably Practicable
HUET	Helicopter Underwater Escape Training
IMCA	International Marine Contractors Association
IMO	International Maritime Organisation
ISM	International Safety Management
MLC	Maritime Labour Convention
PTW	Permit to Work
RAM	Risk Assessment Matrix
RAMS	Risk Assessment Method Statement
TBT	Toolbox Talk

Policies

Contractors must as a minimum comply with the content of the following CCC (UE) policies and Code of Conduct:

- CCC Code of Conduct (Values and Guiding Principles)
- CCC (UE) QHSE Policy
- CCC (UE) Alcohol and Drug Policy
- CCC (UE) Security Policy
- CCC (UE) Non-Smoking Policy
- CCC (UE) Miscellaneous Policy
- CCC (UE) Contractors Health & Safety Policy
- CCC (UE) Competency Policy
- CCC (UE) Crew Policy
- CCC (UE) Under-keel Policy
- CCC (UE) Jewellery Policy
- CCC (UE) Footwear Policy
- CCC (UE) Harassment and Bullying Policy



Contractors Health & Safety Policy

- CCC (UE) Adverse Weather Policy
- CCC (UE) CCC (UE) Compound Policy
- CCC (UE) CCC (UE) Fishing Policy
- CCC (UE) Stop Work Authority Policy
- CCC (UE) Environmental Policy
- CCC (UE) Software Management Policy
- CCC (UE) Medical Fitness Policy
- CCC (UE) Electronic Device Safety Policy
- CCC (UE) Mobile Phone and Electronic Device Policy

Operations inside the United Arab Emirates undertaken by, or on behalf of CCC Underwater Engineering must comply with the Abu Dhabi Occupational Safety and Health System Framework (OSHAD SF) requirements.



Scope of Work

It is important for Contractors to be aware of the scope of work set out for them in order to plan the work properly.

When the scope of work is known, a risk-based planning of the work can be properly approached.

A risk-based approach is a way of approaching the work, where the potential of a risk determines the way a work process is executed. The approach will also help the Contractor navigate through this document in terms of what training is needed, what to bring on site, who and when to contact, etc.

In addition to the requirements set out in this document, it is also important to know that there are special requirements, if the Contractor is providing the following services or work:

Service Area	Special Requirements
Scaffolders	Must comply with National Scaffolding Standards
Crewing agents	Must be audited at least once every 12 months by CCC (UE)
Providers of vessels	The Flag State of the vessel must be in IMO's Whitelist The Vessel Owner must ensure that crew is able to speak, write and understand English If not certified ISM and MLC, the Vessel Owner and vessel must work structured with the requirements in these standards – meaning maintaining a safety management system Must be able to show IMCA reports

Training requirements

It is important to know whether the Contractor will be conducting work on board the vessel, while the vessel is either alongside or sailing, or if the work is commenced on site only.

It is important to state that the matrix below is only stating the requirements of CCC (UE) and not our clients. Our clients may have additional requirements, and these must be complied with as well when our vessels are working on their Projects. Furthermore, the requirements stated relates to safety solely.

CCC (UE) has divided the levels of access to our vessels into 3 categories:

Access alongside: Means all (including visitors) accessing the onshore sites and the vessel while alongside in port. Access to the vessel when not alongside in port, is not allowed.

Signing on and off alongside: Means all (including visitors) signing on the vessel while being alongside in port, who will need to stay on board while the vessel is offshore and signing off again when the vessel returns alongside in port.

Transfer offshore – by crew boat, RIB or Supply boat: Means all (including visitors) accessing the vessel when it is offshore.

Access level	Site Induction	Vessel Induction	Medical Certificate	OPITO or STCW Sea Survival	As per Client requirements
Access along- side	(X)	(X)			X
Signing on and off alongside	(X)	X	(X)	X	X
Transfer offshore – by crew boat	(X)	X	(X)	X (Including HUET for Helicopter transfer)	X

Site Induction: May comprise both a client project induction as well as one or more site specific inductions. Only mandatory, if entering a site area and not if the vessel is alongside in a port without site restrictions.

Vessel Induction: Will be a familiarisation of the vessel provided by the vessel crew.

Medical Certificate: Must comply with Client requirements to sign on a company vessel. Divers must hold a diving medical from an HSE approved or IMCA recognised Medical Practitioner prior to performing any underwater diving duties or



Contractors Health & Safety Policy

entering a decompression chamber. If the vessel is foreign flagged, the medical certificate must meet the requirements set out by the flag state of the vessel – Ask your contact person for clarification.

HUET: Helicopter Underwater Escape Training is only mandatory if transfer is to be conducted with a helicopter.

As per Client requirements: Our Clients hold specific training requirements - Ask your contact person for clarification.

What to bring

CCC (UE) require that our Contractors bring the following with them when engaging work for us.

Onshore	Offshore
Certificates of Competency in original form	Certificates of Competency in original form
Identification	Passport
Certificates on equipment and tools	Medical Certificates in original form
Personal Protective Equipment	Personal Protective Equipment
	Seaman's book if required
	Letter of Appointment for required job disciplines

Planning of the work – Safe System of Work

When planning the work, it is vital that the Contractor is aware that CCC (UE) has specific requirements for work processes involving hazards.

When working for CCC (UE), we require a document package to be completed in order to be ready for the work. Not because the documents eliminate the hazards, but it enables a risk-based approach to the planning and conducting of the work.

The document package consists of:

- A Method Statement – To be delivered for review in good time before arrival on site or vessel by the Contractor.
- A Risk Assessment – To be delivered for review in good time before arrival on site or vessel by the Contractor. It must be job/task specific considering the local working environment and the context the Contractor will be working in.
- A Permit to Work (PTW) – Will be issued on site or on board the vessel, by our Site Manager. The Permit to Work enables the Site Manager or Officer to have a constant overview of ongoing operations / work to ensure it will not collide.
- A Toolbox Talk (TBT) – Must be conducted just before the job is to begin. All involved parties must participate and understand all aspects of the work. Proper instructions must be given, and any doubts should be addressed.

This package is also known as our Safe System of Work.

Risk Assessment Method Statement

In CCC (UE) we assess and manage risks based on the ALARP principle by applying controls and barriers in accordance with the Hierarchy of Controls (Refer to section “Controls and Barriers” on the next page) and we require our Contractors and Suppliers to do the same.

The ALARP principle involves weighing a risk against the trouble, time and money needed to control it. For risk to be ALARP, it must be possible to demonstrate that the cost and efforts involved in reducing the risk further would be grossly disproportionate to the benefit gained.

Assessing the risk of a particular scenario should be done in sequence, i.e., first the potential consequence is estimated and only hereafter the likelihood of such consequence occurring is assigned.



Once the hazards have been identified, an initial risk assessment is made, and existing controls and barriers are identified. With the existing controls and barriers in place the residual risk is assessed – such risk must be mitigated to ALARP by applying additional controls and barriers:

Risk Assessment

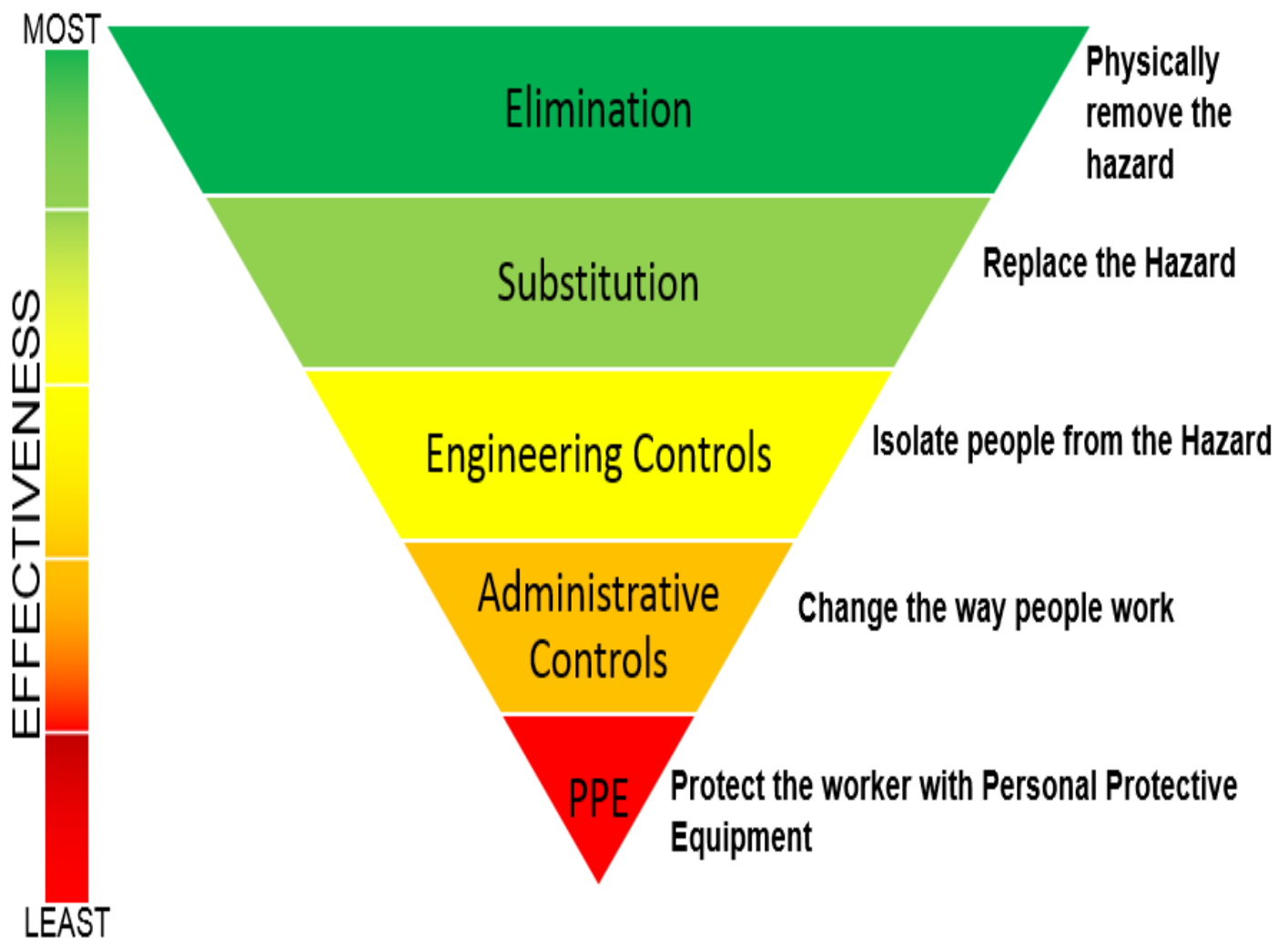
Risks shall be assessed from the following 4 aspects:

- People (health, safety, and security)
- Environment (spills, emissions, noise, etc.)
- Assets (property / equipment damage, delay, etc.)
- Reputation (media, clients, public, etc.)

When assessing risks all Four (4) aspects must be considered.

Controls and Barriers

When applying additional controls and barriers, keep in mind the Hierarchy of Controls in terms of selecting the most effective controls and barriers:



Additional controls and barriers must be applied to mitigate the risks best possible – and as a minimum to the ALARP level.



Example of Generic Risk Assessment (Note, this is only a generic example and not the format that CCC UWE use)

ID	Activity	Hazard	Initial Risk Assessment			Existing Controls/Barriers	Residual Risk Assessment			Additional Controls/Barriers	Responsible for Controls/Barriers
			C	F	R		C	F	R		
1	Working at Height	Fall to same or lower level	5	3	High	Follow RAMS / SMS / Procedure	2	3	Medium	Ensure rescue from height capabilities / drills	Master / OOW
						Obtain / follow Work Permit					
						Conduct Toolbox Talk					
						Use correct PPE as per PPE Matrix					
						Use safety harness / fall restor					
2	Working at Height	Fall overboard	5	2	High	Follow RAMS / SMS / Procedure	3	2	Medium	Ensure MOB capabilities / drills	Master / OOW
						Obtain / follow Work Permit					
						Conduct Toolbox Talk					
						Use correct PPE as per PPE Matrix					
						Use life jacket / immersion suit					
3	Working at Height	Dropped objects	5	1	High	Follow RAMS / SMS / Procedure	2	1	Low		
						Obtain / follow Work Permit					
						Conduct Toolbox Talk					
						Use correct PPE as per PPE Matrix					
						Secure tools and equipment					
						Cordon off adjacent areas					
						Use appropriate safety signs / notices / tape					

Sample only



Method Statement

A Risk Assessment must be supplemented by a Method Statement. A Method Statement may be a stand-alone document specific to the operation/task; however, it may also be in the form of a reference to approved procedures, work instructions, forms, and checklists in existing systems such as:

- Operational procedures, instructions, forms, and checklists in a Safety Management System
- Operational procedures, instructions, forms, and checklists in approved project documentation.
- Work instructions in a Planned Maintenance System
- Instructions and guidelines in equipment and system manuals

If used as (part of) a Method Statement, such references shall be detailed and documented to the end-user(s).

All Risk Assessments and Method Statements must be reviewed by the person ordering the work from the Contractor.

For further guidance with regards to preparation of a RAMS, kindly see the attached RAMS template.

Work related requirements

General

In CCC (UE) no work is commenced without a method statement, risk assessment, a Permit to Work (if required) and a Toolbox Talk is completed and reviewed beforehand, at least.

Lifting Operations

In accordance with CCC (UE)'s internal lifting requirements, all lifting operations must comply with Industry best practice

CCC (UE) will supply competent crane operators. The competence of the CCC (UE) crane operators will be assessed and approved by the Appointed Person.

The CCC (UE) Field Engineer or Team Leader will be present on the vessel as the company representative. If he has concerns regarding health and safety for performed lifting operations, these concerns will be raised on the vessel and a solution to improve working practices must be agreed.

Working at Height

There is a simple hierarchy for managing and selecting equipment for work at height. Duty holders must:

- Avoid work at height whenever possible
- Use work equipment or other measures to prevent falls where they cannot avoid working at height, and
- Where they cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.

Before any task involving working at height is undertaken on the vessels, a suitable and sufficient risk assessment must be in place to ensure that all adequate control measures are in place to eliminate/reduce the risk of falls from height.

If Mobile Elevated Working Platforms (MEWPs) are required, the safe system of work for operating the equipment will be incorporated in the lifting plan. All use of MEWP's requires thorough instruction, however in some countries this requires a certificate in order to operate.

Control of Substances Hazardous to Health (COSHH)

COSHH refers to a set of health and safety regulations covering the Control of Substances Hazardous to Health.

- All chemical and substances on board the vessel and in operational use will have a Material Safety Data Sheet (MSDS) and a suitable and sufficient risk assessment for the use of the product. The COSHH Assessments will



identify safe use and storage of the chemicals/substances, which will be implemented.

- The COSHH Assessments will be available at all times for the user to ensure that safe working practices are implemented.
- A COSHH Register will be available and maintained on board each vessel.

Emergency preparedness

CCC (UE) shall have a Safety Arrangement Plan based on the general arrangement of the vessel and the site showing the positions of fire hydrants, fire extinguishers, safety equipment, usable toilets, muster points and escape routes. The Safety Arrangement Plan, which should be displayed in prominent areas, is to be updated promptly should changes occur to the arrangements.

- Emergency response details will be given during Site Inductions.
- The Contractor must familiarise himself with and understand these emergency arrangements and the Safety Arrangement Plan.

Arrival on site

Site Inductions

Upon arrival, persons must report to the Site Office, normally this will be the Bridge. Here, the Site Inductions and directions will be given. All coordination of work will go through the Site Office. If there is no appointed site area, the vessel will coordinate.

The HSE Officer, Chief Mate or Site Manager will then proceed with the Site Induction. The Site Induction is required for all entering the Site.

In addition to this, our client may also have a mandatory Site Induction for all entering the Site. This will sometimes be in the form of an online induction which needs to be completed before arrival on site.

If the work is being conducted somewhere without an appointed site area, the vessel will act as site and give a vessel induction.

Reporting

All Contractors are obligated to report any accidents, incidents, near-misses, non-conformities, observations, or situations holding potential to become one of the listed items.

This is done by reporting to the line supervisor / manager immediately.

Remember that reporting does not solve anything here and now –actions must be taken for the report to be meaningful.

Where a Client has a specific Incident or Accident reporting requirement then it must be followed but all reports from a contractor shall be issued through CCC (UE).

The correct reporting protocol must always be followed. (Sub)Contractor will have a Point of Contact with the CCC (UE) and all reports will be submitted to them, and communications directed through them, not directly to the Client (COMPANY) or main Contractor.

All man-hours used for the work must be reported to the Site Manager or Team Leader in the Daily Progress Report, Leading and Lagging KPI's will be agreed and stated on the project DPR and reported daily.

Inspections

CCC (UE) is audited and inspected by authorities, Clients, and classification societies on a regular basis. We also perform audits and inspections internally.

Contractors should therefore be prepared for audits and inspections.



Responsibility & Implementation of the Policy

Ultimate responsibility for the successful implementation of this policy remains with the Managing Director and the top level of Senior Management. CCC UWE SAL shall communicate the QHSE policy to every employee and display it in prominent locations.

Ramzi I Khoury
General Manager

Document No: CPL 006
Revision Date: 3rd June 2024

Revision: 04

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