

Rev 07

APPENDIX 4

Drivers, Driving and Defensive Driving Training

Purpose

To manage Risks¹ of driving and transportation of people and goods on Company Business.

Sakhalin Energy operations rely heavily on road transport for the movement of personnel and goods. Many road traffic incidents are related to driver behavior and, therefore, this Standard describes Sakhalin Energy's minimum mandatory requirements for drivers and driving with respect to Health, Safety and Environment.

Who is this for?

- Managers/Department Heads;
- Transport Area Supervisors;
- Drivers;
- Contract Holders;
- (Sub) Contractors.

What situations are covered?

This document addresses the following issues:

- Requirements for drivers including Defensive Driving Training.
- · Requirements for driving.

Additional requirements may also apply to specific projects, contracts or operating areas. These will be set out in individual contracts or Asset-Level controlled documents.

Terminology

TERM	MEANING
Shall	Indicates a mandatory course of action.
Should	Indicates a preferred course of action.
May	Indicates a permitted course of action.

Terms and Definitions

TERM	MEANING
Company	Shall mean "Sakhalin Energy Investment Company LTD" and any affiliated organization (contractors and subcontractors, etc.) that operate on behalf of "Sakhalin Energy Investment Company LTD".
Professional Drivers (PD)	Personnel specifically employed to drive a Company vehicle.
Non-Professional Drivers	Personnel driving Company vehicles and: not employed as a Professional driver not <i>High Exposure Group Driver</i> driving a Company <i>Vehicle</i> LESS than 150 km , per week. Non-Professional Drivers are <u>only</u> allowed to drive category (M1, N1) vehicles.

¹ Italicized terms in this document are included in the <u>Sakhalin Energy HSE Glossary</u>

UNCLASSIFIED	Document 0000-S-90-04-O-0005-00-E	Appendix 4	Revision 07	Printed copy uncontrolled	p1 of 9
--------------	-----------------------------------	------------	-------------	---------------------------	---------



Rev 07

High Exposure Group Drivers	Personnel driving Company vehicles and who:
Vehicle	Any Vehicle owned, leased, rented or contracted by Sakhalin Energy on any journey conducted on behalf of Sakhalin Energy (Including privately owned Vehicles).
DDC	Defensive Driving Course
Hands Free Mobile	A <i>Vehicle</i> installation whereby a mobile phone is docked into fixed equipment permanently wired to the <i>Vehicle</i> , and where there is no cable / wireless connection between the equipment and the <i>Driver</i> .
Road	A belt of land or surface of an artificial structure equipped or adopted and used for Transport Vehicle traffic.
Off-Road	Ground that has not been prepared as a road, either by grading or by the provision of a prepared road surface
RF Law	Any requirement provided in the Constitution of Russia, any federal law passed by the State Duma, or Ministerial decree, order or regulation based on a valid federal law.
Trip Log Sheet (waybill)	Is a document authorising the use of the vehicle.

1. Responsibilities

Managers or Department Heads are responsible for requirements 1.1. to 1.3:

- 1.1. Ensure the activities they control are managed in accordance with the content of this document.
- 1.2. Provide vehicle fleets and organisations that are sufficient to carry out the content of this document.
- **1.3.** Analyze and use available information including information provided by In-Vehicle Monitoring System to reinforce good driving behaviour or correct negative driving behaviour.

Transport Managers are responsible for requirements 1.4. to 1.8.:

- **1.4.** To manage Land Transport Vehicles in accordance with:
 - Russian Federation law (overview is provided in Legal Requirements for Road Transport2), and
 - Lender and Shareholder requirements defined in International Requirements for Road Transport
- **1.5.** To provide vehicle fleets and organizational framework sufficient to comply with the requirements of this document.
- 1.6. To ensure that the transport vehicles operated by them comply with this document.
- **1.7.** To ensure that the related personnel are aware of the responsibilities with respect to implementation of this document.

Transport Supervisors are responsible for requirements 1.9. and 1.10.:

- **1.8.** Ensure that the road transport activities they are responsible for overseeing is carried out in accordance with the requirements of this document. This shall include monitoring and checking drivers and to verify that they meet the requirements of this document.
- **1.9.** Analyze and use available information including information provided by In-Vehicle Monitoring System to reinforce good driving behaviour or correct negative driving behaviour.

Drivers are responsible for requirements 1.11. to 1.16.:

- 1.10. Operate their vehicles in compliance with this Document.
- **1.11.**Be physically and mentally capable of operating the Vehicle.
- 1.12. Shall comply with Sakhalin Energy's Life Saving Rules
- **1.13.** Shall be rested and alert to maintain attention throughout the trip or stop the Vehicle and take a rest break if attention is lost. Drivers may refuse to drive when they feel that they are not fully rested or alert.
- **1.14.** Drivers shall ensure all occupants of their vehicle are seated with their seatbelts fastened.

² Underlined items in this document refer to Sakhalin Energy Controlled Documents.

UNCLASSIFIED	Document 0000-S-90-04-O-0005-00-E	Appendix 4	Revision 07	Printed copy uncontrolled	p2 of 9
--------------	-----------------------------------	------------	-------------	---------------------------	---------



Rev 07

1.15. Shall stop when directed to do so by a member of the Sakhalin Energy Road Safety Monitoring Team or a passenger in the vehicle. Drivers shall obey instructions given by a member of the Road Safety Monitoring Team if those instructions do not contradict Russian Federation law and Sakhalin Energy Road Transport HSE Management Standards and documents.

Contract Holders are responsible for requirements 1.17. to 1.20.:

- **1.16.**Implement this Document by ensuring that activities they control are managed in accordance with its requirements. This shall include ensuring that the requirements of this Document are included as mandatory conditions of contract for activities that are within the scope of the Document.
- **1.17.**Provide vehicle fleets, organisations and drivers that are sufficient to carry out the content of this Document.
- **1.18.** Analyze and use available information including information provided by In-Vehicle Monitoring System to reinforce good driving behaviour or correct negative driving behaviour.
- **1.19.**Provide and approve the list of nominated drivers and required type of required Defensive Driving Course and approve any changes to the initial list.

2. Drivers

2.1. Driver Licenses and Permits

- 2.1.1. All Russian Drivers operating vehicles on Company business shall be in possession of a valid *Russian Federation Driving License* that is appropriate to the type of vehicle to be operated.
- 2.1.2. All Expatriate Drivers operating vehicles on Company business shall be in possession of a valid *International Driving License* (accompanied with valid national *Driving License*) that is appropriate to the type of vehicle to be operated.
- 2.1.3. All drivers who are involved in transportation of dangerous cargoes shall have valid ADR (DOPOG) certificate.
- 2.1.4. All Drivers shall be in possession of a valid **Defensive Driving Course Certificate** (DDCC) for the appropriate category of vehicle. The presence and validity of a driver's DDC Certificate shall be checked **daily**, before the trip log sheet is signed. When driving Company vehicles, the driver shall have the DDC Certificate with him.
- 2.1.5. Trip Log Sheet shall be completed in accordance with RF requirements as described in RF Ministry of Transport Order dated September 18, 2008 No 152 "Affirmation of mandatory particulars and filling order of trip log sheet".

2.2. Minimum Driver Age and Experience

- 2.2.1. Professional and High Exposure Group drivers (apart from bus drivers) shall be a minimum of 21 years of age and have at least THREE years of driving experience on the appropriate category of vehicles, before they are permitted to drive on company business.
- 2.2.2. **Bus drivers** shall be at least 24 years old, and have at least **FOUR** years' experience driving category D vehicles, before being permitted to drive on company business.
- 2.2.3. **Non-professional** drivers shall be a minimum of 21 years of age and shall have at least **TWO** years of driving experience after qualifying to drive, before being permitted to drive on Company business.

2.3. Driver Medical Fitness

- 2.3.1. All drivers shall be both physically and mentally fit to perform their driving duties.
- 2.3.2. All drivers shall undergo periodical medical examinations and have a valid medical certificate in the form "medical report of existence (absence) of contradictions for driving vehicles" № 083/y-10. Medical examinations for all drivers shall be organized as described in the Government Decree № 880, dated July 31, 1998, and RF Ministry of Health and Social Development Order, dated August, 2004 № 83.
- 2.3.3. All drivers shall have medical checks as required by Federal Law No. 196-FZ. Transport Managers shall arrange such medicals at locations where drivers are accommodated.
- 2.3.4. Drivers shall not operate vehicles whilst under the influence of alcohol and/or drugs (including prescribed medication that may affect concentration and/or driving ability). Possible side effects

UNCLASSIFIED	Document 0000-S-90-04-O-0005-00-E	Appendix 4	Revision 07	Printed copy uncontrolled	p3 of 9
--------------	-----------------------------------	------------	-------------	---------------------------	---------



Rev 07

from prescribed medication shall be reported by drivers to the appropriate Supervisor prior to any driving activity.

2.4. Training

- 2.4.1. In accordance with Directive Document of raising professional level and probation of drivers RD-200-RSFSR-12-0071-86-12 all professional Drivers shall attend 20 hour driver qualification and requalification training, yearly. This is to be organized by the driver's employer.
- 2.4.2. In accordance with the provision of conducting driving safety inductions No Rd-200-RSFSR-12-0071-86-09, the following inductions shall be provided to all professional drivers:
 - Introductory;
 - Pre-trip;
 - Periodical:
 - Seasonal;
 - Special.
- 2.4.3. All drivers shall have successfully completed a Sakhalin Energy approved Defensive Driver Training appropriate for the category of vehicle they are driving and driving environment, before being permitted to drive a Company vehicle

2.5. Driver Behaviour

- 2.5.1. Drivers shall comply at all times with applicable Russian Federation Traffic Law, all requirements of the Road Transport HSE Management Standard and the Life Saving Rules.
- 2.5.2. Drivers shall always lock (and immobilize if practicable) vehicles when unattended outside of a fenced production Asset.
- 2.5.3. Drivers shall not leave unattended vehicles carrying loads likely to be subject to theft.

3. Driving

3.1. Driving, Duty Hours and Rest Time

- 3.1.1. Drivers shall not exceed driving, duty and rest breaks hours described in Attachment 1 of this document "Driving, Duty and Rest Time"
- 3.1.2. If there is a difference between the Russian Federation allowable duty hours (defined by RF Ministry of Transport Order No. 15 dated August 20, 2004, 'Regulation for Working Time and Time for Rest for Drivers') and Sakhalin Energy imposed Driving, Duty Hours and Rest Time, the stricter requirements shall be followed.

3.2. Speed Limits

- 3.2.1. Drivers shall not exceed speed limits set by RF Law and which are provided in Attachment 2 of this document "Sakhalin 2" Project Speed limits.
- 3.2.2. Sakhalin Energy may set a specific (stricter) speed limit for high-risk vehicles or at its location/Asset, which shall not be exceeded on any road.
- 3.2.3. If there is a difference between the Russian Federation posted speed limit and Sakhalin Energy imposed limits, drivers shall adhere to the lowest of these limits.
- 3.2.4. Drivers shall at all times exercise caution and where necessary shall reduce speed below the posted limit to suit the vehicle, load, road and weather conditions, including visibility towards the direction of traffic.

3.3. Seat Belts

All drivers and passengers shall wear a seatbelt at all times when their vehicle is in motion.

3.4. Visibility

- 3.4.1. Vehicles shall be operated with low beam headlights switched on at all times.
- 3.4.2. Drivers shall be responsible for maintaining their vehicles in a clean condition in order that good all round visibility is maintained, and to ensure that headlights, tail lights and distinctive external markings on the vehicle remain clean and visible.
- 3.4.3. Drivers shall not display or place anything inside or outside of the vehicle in such a way that can obstruct driver visibility.

UNCLASSIFIED	Document 0000-S-90-04-O-0005-00-E	Appendix 4	Revision 07	Printed copy uncontrolled	p4 of 9	
						ı



Rev 07

3.5. Personnel Visibility

- 3.5.1. Each vehicle shall carry one high visibility vest.
- 3.5.2. Drivers shall wear the vest when performing activities around the vehicle when stopped due to an incident, breakdown or other activity.

3.6. Communication Equipment

Drivers shall not use handheld communications devices whilst operating a vehicle in motion. (Examples of wireless communication devices are two-way radios, GSM and satellite phones including hands free mobile devices).

NOTE: A vehicle is considered to be in motion at all times it is participating in traffic (including while waiting for junctions or traffic lights). A vehicle is considered not in motion while stopped or parked in an area allowable under the RF traffic regulations or specially designed for parking purposes.

NOTE: Any failure to comply with the requirements 3.3 and 3.6 will result in disciplinary action being taken against persons failing to comply as per the <u>Sakhalin Energy Life Saving Rules</u>. In cases of tampering with a seatbelt the consequence will be immediate dismissal of the driver or passenger.

4. Defensive Driving Training

Before a driver undergoes defensive driving training, the following is required:

- **4.1.** Driving instructor shall check availability of original copy of all drivers' driving license before the start of each day of the training;
- **4.2.** Driving instructor shall check availability of original or copy of medical certificate in form of № 083/y-10 for all Professional and High Exposure Group drivers before the start of the first day of the training;
- **4.3.** Driving instructor shall conduct breath alcohol test to all drivers at the beginning of each training day.
- **4.4.** Driving instructor shall report all non-compliances to the DDC Coordinator.

Type of training:

- Professional Defensive Driving Course for Light Vehicle Drivers (PDDC)
- Non-professional Defensive Driving Course (NDDC)
- Off-Road Defensive Driving Course (Off-Road DDC)
- Winter Defensive Driving Course (WDDC)
- Professional Defensive Driving Course for bus drivers (PBus DDC)
- Professional Defensive Driving Course for Heavy Goods Vehicle drivers (PHGV DDC)

4.5. As a minimum the Defensive Driving Course shall cover the following:

- Review of company policies and standards related to driving;
- Defensive driving technique;
- Journey management technique;
- · Alertness and fatigue management;
- Effects of medication and substances abuse;
- Safety restraint systems and safety equipment;
- Pre-trip check and proper seating position;
- Local driving hazards (including personal security), regulations and culture;
- Vehicles towing trailers (Light and Heavy Goods Vehicles);
- Commentary driving;
- Assessment of driving skill and behavior.

4.6. Courses Required for Professional and High Exposure Group Drivers:

4.6.1. Drivers of Light vehicles (Category B) require:

- Professional Defensive Driving Course for Light Vehicle Drivers (PDDC). Once every 2 years;
- Winter Defensive Driving Course (WDDC). Once every 2 years.
- Off-Road Defensive Driving Course (Off-Road DDC) (if required to drive in off-road conditions).
 Once every 2 years.

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Rev 07

- 4.6.2. Drivers of Heavy Goods Vehicles (Category C, E) require:
 - Professional Defensive Driving Course for Heavy Goods Vehicles (PHGV DDC). Once a year;
 - Winter Defensive Driving Course (WDDC). Once every 2 years.
 - Off-Road Defensive Driving Course (Off-Road DDC) (if required to drive in off-road conditions).
 Once every 2 years.

4.6.3. Drivers of Buses (Category D) require:

- Professional Defensive Driving Course for Bus drivers (PBus DDC). Once a year;
- Winter Defensive Driving Course (WDDC). Once every 2 years.
- Off-Road Defensive Driving Course (Off-Road DDC) (if required to drive in off-road conditions).
 Once every 2 years.

4.7. Courses for Non-professional Drivers:

Non-professional drivers (Category B) require:

• Defensive Driving Course for Non-professional (NDDC). Once every 2 years.

NOTE: Although both Winter Defensive Driving Course (WDDC) and Off-Road Defensive Driving Course (Off-Road DDC) are mandatory type trainings, their absence will not be considered as violation of Life Saving Rule №7 "I will not drive a Company vehicle without valid Defensive Driver Training".

NOTE: Requirements on Defensive Driving Courses per driver category are also given in Attachment 3 "Training Matrix"

4.8. Training Requests

- 4.8.1. For Sakhalin Energy personnel. Requests shall be submitted by a person from Sakhalin Energy who is responsible for the Driver and where applicable approved by site/asset manager.
- 4.8.2. For Contractors/subcontractors personnel. Request shall be submitted by persons responsible for the Driver and approved by Contract Holder (Contract Holder from Sakhalin Energy Company).
- 4.8.3. Requests shall be submitted with the use of <u>Defensive Driving Course Request Form</u> (DDC Request Form) at least two weeks before the training. DDC Request Form shall be sent to Sakhalin Energy DDC Coordinator to <u>SEICDDCCoordinator@sakhalinenergy.ru</u> mailbox.

4.9. Passing Criteria

For the pass/fail scoring criteria see Attachment 4. If a participant does not pass the training on the first attempt, the driver's Line Supervisor will be notified in writing and re-training can be organized - but only once. A driver who has not passed the training shall not be allowed to drive on a Company business until a pass mark is achieved. Requests for re-training shall be submitted in the same mode as described above.

4.10. Requirements for Driving Instructor/Trainer

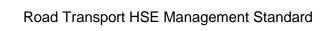
Driving Instructor shall have the following qualifications and experience:

- 4.10.1. A defensive driving instructor qualification certificate from a recognized institution (e.g. Institute of Advanced Motorists (UK) or other internationally recognized equivalent).
- 4.10.2. Shall have at least TWO years of experience as driving instructor of the appropriate category of the vehicle.
- 4.10.3. Hold a valid driving license that is legally approved for the location they are working in.
- 4.10.4. Be competent in driving and handling of the vehicle type assigned to the target audience.
- 4.10.5. Those instructors who conduct trainings for expatriate personnel should be fluent in English language.

4.11. Requirements for Vehicles used for Defensive Driving Training

All Defensive Driving Trainings shall be conducted on vehicles which are fully compliant with <u>Land</u> Transport Vehicles Appendix 6.

UNCLASSIFIED	Document 0000-S-90-04-O-0005-00-E	Appendix 4	Revision 07	Printed copy uncontrolled	p6 of 9



Rev 07



DURATION	VEHICLE TYPE		COMMENTS	
	Light and Heavy < 9.5 meters	Bus and Truck > 9.5 meters		
Maximum Daily Shift*	10 hours	10 hours		
Maximum Driving Hours	9 hours	8 hours	Total driving hours shall not exceed 90 hours in any two-week period. Where individual long haul trips necessitate driving in excess of these stipulated maximum times, two drivers shall be provided.	
Maximum Continuous Driving	2 hours		All Drivers shall take a minimum of 15 minutes rest in every maximum continuous	
Maximum Continuous	1 hour		driving period	
Driving for off-road and			Bus drivers conducting intercity journeys	
driving during the			shall take a minimum of 30 minutes rest in	
hours of darkness.			every two hour driving period	
Minimum Daily Rest	12 hours		Drivers shall take a minimum of 12 hours	
			daily rest between two daily shifts	
Minimum shift break (night, day)	Minimum of a conting period when changing	nuous 36 hour break g shift		

The Daily Shift includes:

- a. Driving time;b. Rest time during the trip and at the end of the trip;
- c. Time required for medical check before and at the end of the shift;d. Time at loading and off loading points of both passengers and goods;
- e. Time required for any repairs;
- f. Time for required for ensuring security of the load;
- g. The drivers time as a passenger when two drivers are required to conduct a journey;
- h. Downtime which was not caused by the driver



Rev 07

ATTACHMENT 2: SAKHALIN 2 PROJECT SPEED LIMITS

Vehicle Type	Road	Maximum Speed KM/H
All (except the restrictions given below)	Graded, Snow-covered	70 km/h – or lower as posted
All (except the restrictions given below)	South Access Road	60 km/h – or lower as posted
All-terrain bus (except restrictions indicated below)	Asphalt	70 km/h – or lower as posted
All-terrain bus (except restrictions indicated below)	Graded, Snow-covered	60 km/h – or lower as posted
Driving in emergency situation.	All	Speed shall not exceed permitted limit for the category of transport which used for emergency response and posted speed signs.
RESTRICTIONS		
All vehicles	Off-road	25 km/h
All vehicles	Sakhalin Energy Industrial Sites	20 km/h – or lower as posted



Rev 07



ATTACHMENT 3: TRAINING MATRIX

Driver Category	PDDC	NPDDC	PBus DDC	PHGV DDC	Off-Road DDC	WDDC
Professional drivers (light vehicles)	✓				√ (if applicable)	✓
Non-professional drivers		✓				
High exposure group drivers	✓				✓	✓
Bus drivers			✓		√ (if applicable)	✓
HGV drivers				✓	√ (if applicable)	✓

ATTACHMENT 4: DEFENSIVE DRIVING TRAINING SCORING CRITERIA

Type of training	Total point	Pass point	Pass point for retraining	Points without retraining	Assessment Criteria	
NPDDC	48	36	35-25	24 and less	60/76³	
PDDC 1 st day	28	21	20-15	14 and less	s polygon⁴	
PDDC 2 nd day	32	24	23-17	16 and less	65/84	
PHGV 1 st day	37	28	27-19	18 and less	polygon	
PHGV 2 nd day	41	31	30-21	20 and less	75/84	
PBUS 1 st day	34	26	25-18	17 and less	polygon	
PBUS 2 nd day	37	28	27-19	18 and less	75/84	
WDDC	25	19	18-15	14 and less	polygon	
Off-Road DDC	18	13	12	11 and less	polygon	

³ The first number represents the driving technique of the vehicle. The second number represents the way the driving technique is applied whilst driving in town

⁴ The training area where the first day of practical training is conducted,

UNCLASSIFIED	Document 0000-S-90-04-O-0005-00-E	Appendix 4	Revision 07	Printed copy uncontrolled	p9 of 9	1
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