



Occupational Health and Hygiene

Purpose

To systematically identify *Health Hazards*¹ and assess and control *Health Risks* in the workplace, and to encourage healthy and productive lives of employees.

Who is this for?

- *Managers and Supervisors;*
- *Employees;*
- *Contract Holders and Contractors* where the Contract Scope includes activities potentially hazardous to health;
- *HSE Professionals.*

What situations are covered?

This document applies to all *Sakhalin Energy Assets, Facilities, Operations, Projects and Activities*, including activities undertaken by any *Contractor* on behalf of the *Company*.

Requirements – General

Managers are **Accountable** for requirements 1 to 3 in their own organization:

1. Manage occupational health and hygiene in compliance with requirements of:
 - 1.1. Russian Federation law (overview provided in RF Legal Requirements for Occupational Health and Hygiene²), or the law of the territory in which work is conducted if outside RF, and
 - 1.2. Lenders and Shareholders as defined in International Requirements for Occupational Health and Hygiene.
2. Implement responsibilities defined in Roles and Responsibilities for Occupational Health and Hygiene.
3. Monitor, report and review in accordance with:
 - 3.1. Occupational Health and Hygiene Control monitoring program
 - 3.2. Incident Reporting and Follow-up Standard,
 - 3.3. HSE Monitoring and Reporting Standard,
 - 3.4. Occupational Health and Industrial Hygiene Assurance Specification.

Contract Holders are **Responsible** for requirement 4 and Contract Engineers are **Responsible** for requirement 4.2.:

4. Require Contractors to comply with the requirements of this standard.
 - 4.1. For existing Contracts, this is limited to compliance required within the existing Contract.
 - 4.2. For new Contracts, require compliance with the requirements of this standard with particular reference to the Medical Conditions of Contracts Specification.

Employees are **Responsible** for requirement 5:

5. Comply with Company health requirements, instructions and procedures.
 - 5.1. Cooperate with Company measures, including reporting of health incidents and unwell conditions.
 - 5.2. Participate in occupational health and hygiene training and activities.

¹ Italicized terms in this document are included in the Sakhalin Energy HSE Glossary.

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

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Requirements – Medical Evaluations for Fitness to Work

Managers are *Accountable* and Supervisors are *Responsible* for requirements 6 to 8.

- 6. Refer employees for *Medical Examination*, as defined in the *Medical Evaluations for Fitness to Work Specification*.
 - 6.1. Verify that employees have completed the Medical Examination and have valid certification.
- 7. Assign work only to those employees who are fit for the work.
 - 7.1. Identify any employee who may not be fit for work and refer the employee for Medical Examination when there is a concern about the individual's Fitness to Work.
- 8. In liaison with Human Resources, manage employees who have been determined unfit for the work as defined in the *Medical Evaluations for Fitness to Work Specification*.
 - 8.1. Review any work restrictions provided by the medical professional.
 - 8.2. As far as possible, approve required accommodations and changes in work assignment.

Employees are *Responsible* for requirement 9.

- 9. Advise their Supervisor or *Health Care Service Provider* or Company Health Manager of a change in their physical or psychological capacity for work.

Requirements – Medical Conditions of Contracts

Contract Holders are *Responsible* for requirements 10-12.

- 10. Refer Contractors to the appropriate clauses in Medical Conditions of Contracts Specification to ensure compliance with Company requirements for:
 - 10.1. Fitness to Work
 - 10.2. Medical Emergency Response
 - 10.3. Occupational Health and Hygiene
 - 10.4. Accommodation and Catering
 - 10.5. Management for Alcohol and Drugs
- 11. Assess Contractor against the requirements listed above
- 12. Monitor, follow up and report progress regarding standard implementation to the business.

Contractor is *Responsible* for requirement 13-14.

- 13. Assess implementation of Company requirements and progressively close out weaknesses identified.
- 14. Report progress implementation of Company requirements listed above.

Requirements – Management of Alcohol and Drug at Work

Human Resources Director is *Accountable* for requirement 15.

- 15. Establish and implement a process to manage Risk caused by the use of alcohol and drugs as defined in the *Management of Alcohol and Drugs at Work Specification*, inclusive of:
 - 15.1. awareness training,
 - 15.2. alcohol and drugs testing,
 - 15.3. provision for referral to treatment/rehabilitation and reintegration into the workplace, and
 - 15.4. process for consequence management.

Company Health Manager is *Responsible* for requirement 16.

- 16. Provide and maintain content for alcohol and drugs awareness training (as part of Health awareness).

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Head of Corporate Security is *Responsible* for requirement 17.

17. Implement alcohol and drugs testing on worksites as defined in Management of Alcohol and Drugs at Work Specification.

Managers are *Responsible* for requirements 18 to 20.

18. Support the implementation of alcohol and drug testing on worksites.
19. When indicated, in liaison with Human Resources and Company Health Manager, support referral to treatment and rehabilitation, and reintegration into the workplace.
20. When indicated, in liaison with Human Resources, implement the Disciplinary Action Procedure.

Employees are *Responsible* for requirement 21 to 23.

21. Comply with Life Saving Rules in relation to alcohol and drugs.
22. Inform Health Care Service Providers and/ or Company Health Manager in case drugs are prescribed by medical professional for treatment or prophylaxis.
23. Seek for medical support and follow prescribed treatment in case of alcohol or drug related problems. Support can be requested directly from employee's Supervisor and/or Company Health Manager.

Requirements – *Medical Emergency Response (MER)*

Managers are *Accountable* for requirements 24 to 28.

24. Ensure that employees have access to medical services that take account of the risks associated with the type and location of their work in accordance with the MER Specification.
 - 24.1. Tier response times and MER requirements are as follows:
 - emergency *First Response* at scene,
 - *First Aid* treatment by a *Designated First Aider* within four minutes,
 - assessment and stabilization by a Medical Professional within one hour,
 - admission to and care at the nearest Local Hospital within four hours,
 - referral to an appropriate Specialist Hospital (timing casualty specific).
25. Identify *Site* characteristics, perform *Risk Assessment*, evaluate required MER resources, and prepare Worksite MER Manuals in accordance with the MER Specification.
 - 25.1. Manage Sites where Tier response times cannot reasonably be achieved.
26. Establish and maintain MER preparedness as defined in the Worksite MER Manuals.
27. Perform MER exercises and monitor MER performance.
 - 27.1. Include MER exercises in the Worksite's program of *Emergency Response* drills and exercises.
 - 27.2. Review MER arrangements for *Remote Worksites* annually.
28. Respond to external requests for MER assistance in accordance with the MER Specification.

Employees are *Responsible* for requirements 29 to 30.

29. Initiate *First Response* and *Call Out* in accordance with Worksite procedure.
30. Provide First Aid if willing to and if trained as a Designated First Aider.

Corporate Health Manager is *Responsible* for requirement 31.

31. Support establishment of MER.
 - 31.1. Conduct Site Medical Reviews.
 - 31.2. Approve Health Care Service Providers for MER and Worksite clinics.
 - 31.3. Manage Company interface with Health Care Service Providers, including local hospitals, *Specialist Hospitals*, and *Assistance Companies*.
 - 31.4. Review Worksite MER Manuals.

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- 31.5. Participate in review of MER exercises and investigation of incidents to identify lessons learned.
- 31.6. Approve medevac or referral to Specialist Hospital in accordance with the Company Tier 3-4 Medevac procedure.

Requirements – Occupational Hygiene

Managers are **Accountable** for requirements 32 to 35.

- 32. Reduce exposure to Health Risks in the workplace *As Low As Reasonably Practicable* using the following Hierarchy Of Controls:
 - Eliminate the health Hazard.
 - Substitute the health Hazard with a less harmful type or form.
 - Use engineering Controls.
 - Use operational/procedural controls.
 - Use Personal Protective Equipment.
- 33. Implement Health Risk Assessment (HRA) in accordance with *Health Risk Assessment* Specification, industry Health Risk Assessment methodology (defined by OGP) and legal requirements (RF Workplace Attestation) with support from the Company Health Manager.
 - 33.1. Review the HRA recommendations with the Company-approved Industrial Hygiene service provider.
 - 33.2. Approve and implement HRA Remedial Action Plans to completion.
 - 33.3. Review HRA in case of *Change* to operations, work places or working practices.
- 34. Implement requirements of the Occupational Hygiene Specification.
 - 34.1. Manage occupational exposure to within regulatory or Company limits, whichever is more stringent.
 - 34.2. Implement and maintain HRA specified *Controls* and *Recovery Measures*, inclusive of the following categories of Risks, for example:
 - Chemical, including *Acute Toxic Substances*, *Asbestos*, and *Refractory Ceramic Fibers*.
 - Biological, including infectious diseases, food and drinking water.
 - Physical, including vibration, noise, illumination, Ionizing Radiation, and work in extreme climate & adverse weather.
 - Ergonomic and Psychological, including *Human Factors Engineering*, manual handling, visual display unit work, organizational factors and stress.
 - 34.3. Manage chemicals at worksites in accordance with the Chemicals Management Specification.
 - 34.4. Implement controls as required by Community Health in Construction Specification.
 - 34.5. Communicate Health Risks and Controls to impacted employees.
 - 34.6. Provide appropriate *PPE* as defined in Personal Protective Equipment Specification.
- 35. Apply Permit To Work for:
 - 35.1. Activities that may involve exposure to Acute Toxic Substances,
 - 35.2. Work on and removal of Asbestos and Refractory Ceramic Fibers.

Company Health Manager is **Accountable** for requirement 36.

- 36. Coordinate the following activities:
 - 36.1. Conduct HRA, recommend Controls, and recommend Remedial Action Plans.
 - 36.2. Develop and implement the Occupational Health and Hygiene Industrial Control monitoring program (in support of requirement 3).

Requirements – Health and Welfare

Human Resources Director is **Accountable** for requirements 37 to 38.

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37. Establish policy in relation to tobacco smoking in accordance with Management of Smoking at Work Specification.
38. Establish policy in relation to AIDS and HIV infection in accordance with Management of HIV/AIDS at Work Specification.

Managers are *Responsible* for requirements 39 to 40.

39. Implement and enforce requirements relating to designated smoking areas as defined in the Management of Smoking at Work Specification, to manage Risks of ignition (safety) and exposure to tobacco smoke (health).
40. Implement Company wellness programs, in support of management of non-occupational Health Risks focusing on employee awareness, promotion of a healthy lifestyle, and creation of a supportive environment.

Company Health Manager is *Accountable* for requirements 41 to 45.

41. Ensure provision for smoking cessation support via Health Care Service Providers.
42. Maintain mechanism for provision of HIV-AIDS treatment.
43. Provide advice to employees in relation to Infectious disease control.
 - 43.1. Maintain Company Pandemic preparedness.
44. Recommend and support Company wellness programs, considering non-occupational Health Risks and improvement measures, and monitor implementation.
45. Provide employee notification and awareness materials in support of Company health programs, including specific responsibilities under the Management of Smoking at Work Specification and Management of HIV/AIDS at Work Specification.

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