**Swift Oil and Gas (Ghana) limited**

**Operations**

**Ghana Content Plan**

Version No: 1

### Ghana Content plan

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## General

The purpose of this document is to detail the plans, procedures and systems that will be implemented by Swift Technical Group and its local partners with regards to Ghana content.

Swift’s policy is to actively enhance the local economies in which we operate and to maximize local content, wherever possible, by utilizing the facilities and skills in the local talent pool, before looking to the international arena. Our commitment to this policy will be reflected in the partnership agreements we will adopt with indigenous local companies and personnel throughout Ghana, who enhance our business with their in-dept local knowledge.

In our experience of staffing major oil & gas field developments, the demand for investment in a local workforce can be difficult to fulfil without the specific local experience and knowledge of long-established indigenous companies. This may be due to lack of regional experience in frontier locations or lack of available experienced workers in regions of extensive oil & gas exploration and development. In Ghana, extensive oil & gas offshore field development has already drawn heavily on the available pool of skilled candidates for long-term operations and maintenance assignments.

Swift has over 30 years’ experience of providing technical support services to the oil and gas industry in International locations. We have the in-depth knowledge of the market to help identify skilled workers from both local and regional sources and guarantee long term supply of locally skilled personnel to our client’s facilities through the formulation of competitive benefits and retention packages and skills transfer and nationalisation schemes.

As a manpower services organization, we recognize that our success depends upon the experience, expertise and professionalism of our full-time staff and consultants on assignment within client facilities. Swift is committed to providing extensive training and development opportunities for all of our permanent staff and consultants and extends these opportunities to consultants and permanent staff seconded within our client organizations.

## Objectives

The primary objective of this plan is to ensure that the maximum level of involvement of Ghanaian companies, personnel and services are maintained without detrimental effect to project quality, safety and cost. It has been designed to address long term issues such as training, technology and skill transfer and an overall decrease in the reliance of International expertise.

Swift fully recognizes its obligation to both the Clients and communities it works within to provide Ghanaian companies and contractors fair opportunities to provide services in line with expectations and demand.

Swift will encourage the development of Ghanaian Companies and personnel at all stages of a project in line with the objectives set out below: -

1. Meet, with the aim to exceed, all content levels communicated by Clients and governmental guidelines throughout the duration of the project.
2. Ensure that the highest caliber of Ghanaian contract personnel are targeted for employment in line with the expectations of Client and Project.
3. Consistently review and re-evaluate Ghana content factors related to the project with respect to identifying areas for expansion.
4. Involve, wherever possible, indigenous Ghanaian companies, institutions and subcontractors without detrimental effect to the Project.
5. Encourage the use of made-in-Ghana goods and services to the project.
6. Encourage value addition/fabrication/assembly of project components within Ghana.
7. Ensure technical partners/sub-contractors, who do not provide made-in-Ghana goods, fabrication and/or services, provide a long-term Knowledge/Technology Transfer Plans.
8. Increase the number of Ghanaians in each project discipline/skill-pool through training, exposure and certification, thus making them available for other major projects.
9. Involve Ghanaian Banks, Insurance providers and other financial institutions in the contract’s financial transactions.
10. **Infrastructure**

To support projects in Ghana, Swift propose to utilize as much of its local infrastructure in the management and performance of the work as possible. This will include the establishment of a number of regional offices and the employments of local personnel as well as the purchasing of material, from Ghanaian companies.

With the above facilities, resources and infrastructure in place Swift intend to manage the project with Ghanaian resources, this will include the following:

1. Contract Interface and Management
2. International liaison and direction of Swift overseas offices in support of personnel placed in non-Ghana locations (USA, Europe, Far East etc.)
3. Domestic and International logistics and mobilization Management
4. Coordination of personnel sourcing and selection in line with overseas offices
5. Management of Ghana content plan and processes
6. Coordination of Ghanaian service provision and subcontractors
7. Invoicing, Payroll and financial management
8. Procurement and sourcing of Ghanaian materials and equipment required to support the project.

By performing these functions in Ghana, Swift estimate that over 75% of any contract work scope can be managed by Ghana personnel and/or provided by Ghana companies. This includes contract personnel hired, goods and services procured and financing/commercial requirements.

## Provision of Ghana Personnel

**Overall Strategy**

The Swift Technical Group has always recognized the importance of nationalizing its workforces in the locations it operates within. The core Workforce Nationalization Programme has been adopted successfully in many countries to date including Kazakhstan, Azerbaijan, Russia, Angola and Nigeria. Swift, in conjunction with its local partners, will be responsible for the management of the Programme and has further developed it to meet the growing needs for nationalization and training in the Ghanaian oil and gas industry.

Swift Technical Group’s overall Workforce Nationalization Strategy is:

1. Increase the number of Ghanaian citizens employed in Ghana.
2. Actively source qualified and skilled Ghanaian nationals.
3. Co-operate with Ghanaian educational establishments and institutions to find employment for qualified graduates.
4. Promote training of Ghanaian nationals.
5. Train Swift’s own personnel through exchange trips with overseas Operations.
6. Co-operate with our Clients to organize “on the job training” for national personnel on secondment.
7. To provide funds and resources to train unemployed citizens of Ghana.
8. Ensure long-term technology skill transfer opportunities are implemented

# Employment, Development and Management of Indigenous Manpower

In order to facilitate the sourcing of local Ghanaians, Swift continually adds to it’s comprehensive database of nationals in our local and head offices. We regularly update these databases by running advertisements in the local and national press as well as on Internet job boards. Our database now holds the details of more than 4,000 Ghanaian citizens.

During the execution of the project, Swift shall maximize the participation of local personnel, services and companies for activities such as:

* Fabrication/Assembles/Constructions ;
* FEED and detailed engineering design ;
* Paintings and Coatings;
* Installations/Erections ;
* Cables installation ;
* Yard or Site Engineering for fabrication or construction work preparations;
* Use of local subcontractors, e.g.: civil works, site services, customs clearance, transportation;
* Administrative, clerical, secretarial and logistical duties required for the project during the engineering, construction training and O & M phases;
* Procurement of various materials, consumables and services during the construction phase of the project;
* Supply of construction equipment, together with all current certifications;
* Employment of labour force from the host communities;
* Training of local staff;
* Personnel for security crews, catering and camp support services

Through its database Swift has registered, qualified Ghanaian staff in all major disciplines.

In addition, along with the actual location of the Works in Ghana, Swift intends to develop a recruitment schedule with local villages and communities for various construction activities depending on the skills of the individuals.

Swift intends to take advantage of this experience and to employ the maximum number of local personnel practicable during all phases of the project.

Where applicable, Swift generally establish an annual agreement with the principal labour organizations of skilled workers. Courses of training will be organized at the sites for community workers, allowing them to reach the requested standards regarding Quality and Safety.

Tentatively, the following categories of Ghanaian personnel will be employed to support projects:

* Community Affairs Manager and Officers
* Engineers (design or field)
* Draftsmen
* Document Controllers
* Safety officers
* QA/QC officers
* Inspectors
* Administrative officers
* Direct and indirect staff
* Maintenance staff
* Construction staff
* Office facilities and business services
* Drivers/operators
* Information Technology
* etc

In addition, Swift will adjust its workforce during construction phases in the following categories:

* Managers
* Senior staff
* Welders
* Pipe fitters
* Fabricators
* Riggers/labour
* Painters/blasters
* Mechanics
* Electricians
* Operators/drivers

## Compliance

For any contract for which the Scope of work and the required resources, including financial, are within the capabilities of a sufficient number of indigenous companies and personnel then Swift shall restrict such services to these companies exclusively.

The business strategy for a project shall be formulated on the basis that, wherever possible, within the framework of commercial sense and business efficiency, work which can be undertaken by indigenous companies and personnel shall be separated out from work which cannot be undertaken by them.

Work execution must not be packaged in such a way that makes it impossible for local contractors to undertake it, even if there is a slight cost penalty. If penalties are greater than Swift’s and their Clients best interests, a positive effort should be made to explain to local contractors these reasons.

Where the content of any project is such that it will be performed outside the country (e.g. specialist fabrication), the project execution strategy shall include, wherever possible, for the participation of indigenous staff or in the form of trainee or secondment.

Where a direct trainee is not appropriate, the international partner(s) shall be encouraged to make the maximum use of indigenous contractors and labour for site based activities.

Execution Plans shall clearly define this policy, specify the manner in which it is to be implemented and clearly state that project execution will take cognizance of the value of indigenous or sub-contracts to be awarded and the levels of Ghanaian manpower to be employed should be equal to current governmental guidelines.

Where the content of a contract is, for the time being, beyond the capabilities of indigenous manpower/contractors and for which foreign expertise is required, and where there is little or no scope for sub-contract to be awarded to indigenous companies, it is recognized that indigenous involvement will probably be limited to direct employment of various trades and labour by Swift.

Local and Community Staff

Swift also recognize its particular responsibilities to local communities and will, regardless of the other requirements of this policy, allocate significant number of slots for local community’s manpower.

Although such staff shall be employed via competitive testing whenever possible, it is recognised that single source hiring will be necessary from time to time particularly for landlord and very small communities.

Hiring strategy in the local communities should be carefully matched with the client’s desire to improve relationships with and the well-being of the community. Thus, it is essential for Swift staff responsible for such employment to work closely with Public Affairs and Local Government Department to ensure that the company’s intentions are fully understood by the local community.

Unskilled personnel will be attached to a more experienced staff member on the project. The objective is to make a realistic start to the work even where the local community personnel are unable to progress autonomously.

General Operating Guidelines for Employment Plan/Program

Company recommends that Client Managers/Supervisors should hire local labour whenever possible in order to assist in stimulating the economy of the local community and to develop the skills of the local workforce. Such hired local labour shall be placed firmly under the project manpower planned disciplines to ensure clear and concise adherence to agreed budgets and plans.

Managers shall hire workers to fill only legitimate positions. Managers should not create jobs solely for the purpose of bringing indigenous staff onto the payroll. Any misunderstandings or problems arising should be reported by the Manager to the appropriate line department as soon as possible and advice sought.

Every Manager shall independently show a high sense of commitment to the communities where they are operating as they may be required from time to time to show tangible community assistance efforts.

There should be a need for periodic briefing session by Managers as a project progresses particularly on community assistance and appointed projects. Community representative(s) should be present at each project progress review meeting to ensure that the community’s view on the project is reasonably considered.

Development of Indigenous Manpower/Contractors/Services

To stimulate the use of smaller, capable indigenous manpower/contractors the following processes will be followed:

* The establishment, within the organization and in conjunction with Client approval, of a standard procedure for the participation of contractors by work category.
* Using this procedure, a list of sub-contractors registered for each work category shall be produced, regularly reviewed and maintained by Contractor Evaluation panels.
* The approved Sub-contractors’ list to provide services will have to go through quality assurance and control approval procedures to register.
* Manpower Planning & Develop Project Management – Because of the fast changes in the industry, manpower programs require an individually developed solution. Indigenous staff should work with foreign technical partners to define requirements and develop a learning solution that will tackle the issues from a change and development perspective.
* Relating corporate change, new technologies and work procedures to manpower planning and development.
* Planning for motivating and training the work force to meet new technology and performance standards.
* Training key officials in the technical and managerial skills needed to handle high capital costs assets - specification writing, tender analysis, procurement, life cycle costing, maintenance policies, management information systems, costing procedures, disposal policies.

**Regional Participation**

Wherever possible and without compromising the application of quality and safety, the local content policy should comprise only of manpower/companies/services from the regional area of the proposed work. Where this could result in lower percentage of targeted local content, then manpower/companies/services will be added successively from other surrounding areas and states.

### Client Project Strategy

Upon contract award Swift would implement the following execution strategy specifically related to content issues for the project lifecycle.

**Phase 1 - Clear Framing of Project Objectives**

It will be necessary for Company and Client to clearly establish the positions required to be performed by national personnel for the duration of the project.

Job descriptions should be issued and Technical skill requirements understood: -

* Minimum Technical Skill requirements.
* Preferable but not essential Technical skills.
* Positions where “on the job” or vocational training can be included.
* Positions where additional training will be required.
* Identification of positions where expatriate personnel will be utilised on a short-term basis with the goal of a National replacement in the long-term.

Initial timeframes for each position should be agreed between Client and Company. This will allow Company to prioritise and allocate the necessary resources effectively.

Company will formulate a Technical staffing plan in line with Project expectations and QA department.

Phase 2 - Identification of Ghana Personnel

The recruitment process would be managed in accordance with companies Recruitment Procedure. This will include the following stages: -

* Search and selection of Technically qualified personnel.
* Categorisation of personnel\*
* Initial approach and interview.
* Background/reference checks with former employers and institutions.
* Technical Competency testing.
* Presentation to Client of vetted personnel for consideration and interview.
* Negotiation of terms and conditions and start date with individual if accepted by client.
* Mobilisation to project site.

A comprehensive overview of the companies Recruitment, Contracts and Logistics procedures have been included, please see attached.

Swift would be involved in the search and selection process. It would utilise its databases and networks to ensure Ghana Nationals are recruited for all identified positions.

Categorisation – During this process Swift would class potential candidates on their previous work experience, education, technical competency etc. Candidates would then be categorized as follows: -

* Level 1 – Technically proficient, able to perform duties without further training.
* Level 2 - Possesses some of the core skills required by Client, further training required.
* Level 3 – Basic skills and experience, both instructional training and “on the job” guidance required. – Swift sponsored training.

Phase 3 – Training of Ghana Personnel (Level 2 candidates)

Swift will always endeavour to find personnel that are a technically proficient match to those positions identified by Client (Level 1 candidates). In some instances, candidates with some of the core skills required may be identified by Client but further training may need to be provided before mobilisation.

To this end, and with the prior agreement of the Client, Swift will commit to training Ghana National personnel to the standards required.

In accordance with the timeframes and mobilisation schedule agreed in Phase 1, Swift would be able to organise relevant training courses for candidates “pre-approved” by the client. These training courses could include;

* Computer based training skills
* Language development
* Certification / Inspection standards – API, NACE, CWSIP, AWS, SWI, WI, ANST, CIP, ANSI etc
* Communication / Management skills
* Offshore survival/medical requirements

If training facilities cannot be identified locally Swift would organise the relevant logistics arrangements to international locations.

The costs of these training courses would be absorbed by Swift throughout the lifecycle of the project.

Phase 4 – Long term Nationalisation and training needs (Level 3 Candidates)

For positions with long lead times (circa 6 months prior to mobilisation) Swift will identify candidates with basic skills and experience that require both comprehensive technical training and further mentoring. With the prior approval of the client Swift will “sponsor” these individuals through to project placement.

Swift will provide all of the technical training requirements during the period prior to mobilisation. When the candidate has reached a level of technical proficiency in line with the requirements of the client, candidate will be evaluated and tested.

Upon successful evaluation candidate will be introduced to the project under the guidance of a “Mentor”. Mentors will usually be an experienced Swift expatriate Engineer or Inspector. The Mentor will provide “on the job” training and guidance and develop the individual to the standard’s required by client.

The success of this programme is based around the long-term realization of nationalization with our clients and to work closely with them in developing a comprehensive and achievable plan.

The main factors involved in such programmes can be broken down in to the following;

* Establishment of the main agreement – Contract Commitment.
* This strategy allows Swift to invest in upfront costs with the fall back of knowing it will have a very high probability of a return on its investment.
* The client has the opportunity to “tailor make” entry-level candidates by working with Swift to establish the basic technical requirements necessary to join its workforce.

These types of courses would be organized by Swift with local employment organizations and educational establishments. Partnership agreements are being developed that will allow the use of in country facilities in a variety of locations with Swift providing the appropriate funding to the sponsored individual.

Swift understand that in some cases candidates may not reach the level of required competency and the training costs incurred would be to its account.

# International Standards and Systems

Swift fully recognise the importance of working within the control of internationally recognised Engineering, Technical and Quality Assurance standards on any major capital project. Swift’s own systems and procedures are ISO certified and all in house and contracted personnel work in accordance with these standards, this covers the following areas:

* Health Safety and Environmental
* Quality Assurance and compliance
* Logistics
* Recruitment
* Contracts and commercial
* Training and development
* Sub-contract, vendor and third-party compliance

As well as ensuring in house compliance is maintained in accordance with these systems, Swift will always work in compliance with its clients’ needs from an Engineering and Technical perspective. Swift has extensive experience of providing services to major oil and gas projects in line with their criteria for Engineering and Technical standards. This will primarily involve the supply of personnel with accreditation or qualifications with those standards.

All of Swift’s personnel records are monitored and regularly updated to ensure personnel proposed have the relevant qualifications required to meet our client’s expectations. Typical standards with which Swift has previous experience of providing personnel with have been summarised below:

AGA ABS ANSI API ARI ASA

ASHRAE ASME ASQ ASTM BSI CSA

CENELEC CGSB CIE DIN DNV

GOST HSE IAOGP IEEE iMeche ISA

ISO ISUG MMS NACE NFPA

NORSOK ROGS UL

By working with these bodies Swift can adopt specific training programs in line with Clients project requirements to ensure Ghana national personnel are available with training and accreditation in these codes and standards.

As well as ensuring that the personnel provided by Swift have experience in the required project standards it will also ensure that any companies or third-party organisations that provide services comply in a similar manner. Through Swifts own Quality and compliance procedures, all third parties will be evaluated and audited to assess its current level of compliance with the standards and systems required to perform their services. Where companies may not have the fully required accreditation Swift will work with them to develop their systems to achieve the required levels. This will include advice and training as well as information exchange and mentoring. Currently all of Swift main service providers comply with our own ISO 9000 certified procedures.

Swift feel that this program can deliver the best long-term Skills and technology transfer results. By providing opportunities to a large number of unskilled/semi-skilled personnel via mentoring and on the job training with experienced Engineers, a wider spectrum of opportunity can be achieved whilst at the same time providing direct exposure to a project environment. This in turn produces a greater number of experienced personnel that can be utilised in a more senior role on future projects. The effects are potentially exponential with continued future benefit to the Ghana people and economy.

Internal and External Courses

Engineering & Project Management:

* Designing and Engineering Design
* Co-ordination of Interaction between Licensers
* Organization of Engineering Design
* Costing and Planning
* Technical Base
* Organization of work

Environmental, Health & Safety

* Environmental Law
* Environmental Law Management
* International Environmental Compliance
* Hazardous Waste/RCRA
* Clean Water/SPCC/Storm Water
* Chemical Management/TSCA
* OSHA/Clean Air/Natural Resources

Marine

* Marine Training/ISO

Quality Management

* ISO 14001
* Quality Management Systems

Risk/Reliability

* Risk Management and Process Safety

Skills Transfer Programs

On-the-job training programs with experienced Ghana and Expatriate Engineers.

On-Line Training

On-line training packages such as the 35-lesson course on “Gas Turbine Fundamentals” will be available to all personnel in all of our Ghana offices.

ABS Academy

ABS Academy is a dedicated facility for the development and delivery of training services to Swift employees and their dependants. ABS offers a variety of courses and development opportunities through the use of technology and knowledge transfer programs with foreign companies and consultants on assignment in Ghana.

## Additional areas for Ghana Content

## Use of Indigenous Ghana Companies and Subcontractors

Throughout the duration of any project Swift would ensure that Ghana content is considered and implemented in to all facets of the operation. This should include all third parties, subcontractors and suppliers of services.

Swift already utilizes Indigenous Ghana companies to support its operations: -

Deloitte

* Legal and tax advice
* Corporate compliance

**SCG Audit**

* Payroll and Tax processing

#### **Various**

* Leasing and rental of offices and accommodation.

We would also ensure that any equipment or materials required for the project are procured from Ghana companies such as: -

* Personal Protective Equipment
* Calibration and metering tools
* Stationery
* Communications equipment
* IT equipment

Before establishing any agreement, Swift carry out a rigorous audit of each company’s operations and conduct background reference checks to ensure their ability to provide services in line with Swift’s expectations.

## Expansion of Swift support team in Ghana

With any new project or contract that Swift secure, one of the first exercises conducted is to evaluate what, if any, additional resources will be required.

In the case of Ghana Projects Swift would look to increase its support function in Ghana and focus its efforts on creating a support function around Ghana content compliance. In most cases this will include the hiring of additional National personnel to support the project. These may include: -

* Administrators
* Payroll & Finance Clerks
* Logistics Coordinators
* Drivers
* Catering staff

At all stages of its own operations Swift will be mirroring the content goals and objectives of the project.

1. **Further Areas of Innovation and Additional Scope**

**Co-operation with educational establishments**

Each year, a large number of young people graduate from universities and institutes in Ghana and abroad with diplomas and other qualifications.

We have recognized that these young people are all looking to put their qualification to practical use and there is a growing demand for qualified young people in the industry. We have therefore begun to explore signing co-operation agreements with a number of educational establishments within Ghana.

We also plan to start dialogues with technical universities in the UK, USA and Portugal where a number of undergraduates from Ghana study who wish to return to work in Ghana. Swift are exploring methods with which we can tap in and utilize this potential resource.**Co-operation with Clients on training of seconded personnel**

We regularly work together with our clients to organize training courses in operating countries and abroad for personnel seconded by Swift to our Clients. We jointly assess the training needs with our Clients and assist in organizing suitable courses. These courses have included language development and technical training courses such as courses in AutoCad and Information Technology. We fully intend to adopt and implement these types of training secondments with all of our potential clients.

# Content Compliance Incentivisation

To ensure buy-in and compliance in line with content objectives incentive schemes could be utilized. Rather like HSE compliance schemes this could be rolled out as a project target to achieve with either client or contractor sponsored project rewards provided on an annual basis.

## Summary

By working in strict accordance with the processes and systems outlined in this document Swift will be able to deliver a first-class service to its Clients which will be in full compliance with the Ghana content objectives in place.

We firmly believe that close-working relationships can be established and content objectives attained to promote and support the social development and quality of life of the Ghana communities involved.

Being able to deliver this service to the project on time, within budget, safely and to the quality expected whilst constantly working towards realizing the Ghana content objectives set out will be the goal of Swift Technical Group.