

HSMP Rev2.3

# Health & Safety Management Plan

FBFV-Roma, QLD

Document Control: Public

Huracan Pty Ltd  
5-Jul-2019  
Revision 2.3



## Document Control

Document Owner: Katrina Hollingworth

Document Approver: Jon Hollingworth

## Revision History

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2.0	K. Hollingworth	J. Hollingworth	22-May-2014	Removal of Environmental Management Plan to separate document and general review
2.1	K. Hollingworth	J. Hollingworth	20-Oct-2015	Document review with minor changes
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Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 1 of 46

## TABLE OF CONTENTS

1.0	Document Control.....	4
1.1	Review and Update Procedures.....	4
1.2	Document Distribution.....	4
1.3	Document Updates.....	4
1.4	Document Publication and Display.....	4
1.5	Notice - Display Locations.....	4
2.0	Overview.....	5
2.1	Introduction & Purpose of Document.....	5
2.2	HSE Objectives, Goals and Targets.....	5
2.3	Scope of Services and Description of the Plant.....	7
2.4	Code of Conduct.....	7
2.5	Terminology.....	7
3.0	Safety Management.....	8
3.1	Health, Safety & Quality Policies.....	8
3.1.1	Health and Safety Policy.....	8
3.1.2	Substance Abuse Policy.....	9
3.1.3	Driving and Journey Management Policy.....	11
3.1.4	Training Policy.....	12
3.1.5	Rehabilitation Policy.....	13
3.1.6	Right to Stop Work Policy.....	14
3.1.7	Heat Stress Management Policy.....	15
3.1.8	Cultural Heritage Policy.....	16
4.0	HSE Responsibilities & Organisation.....	17
4.1	Organisational Chart.....	18
4.2	Responsibilities & Organisation.....	19
4.2.1	Board of Directors - Is responsible for:.....	19
4.2.2	Senior Management (Operations Manager) – Is responsible for:.....	19
4.2.3	Site Manager -Is responsible for:.....	19
4.2.4	Employees and Contractors - Are responsible for:.....	20
4.2.5	HSE Manager - Is responsible for:.....	20
4.3	Health Safety & Environmental Documentation.....	21
5.0	Procedures.....	22
5.1	General and Site Based Employee Inductions.....	22
5.2	New and inexperienced employee mentoring system.....	22
5.3	Training and Development.....	22
5.3.1	Qualifications, Certificates and Licenses.....	23
5.4	Substance Abuse (Drug and Alcohol).....	23
5.5	Personal Protective Equipment.....	24
5.6	Safety and Hazard Warning Signs.....	24
5.7	HSE Meeting Requirements during Operations.....	25
5.8	Inspections and Audits.....	25
5.8.1	Internal Inspections and Audits.....	25
5.8.2	External Inspections and Audits.....	26
5.9	Hazard and Incident Reporting.....	26
5.9.1	Individual Obligations.....	26
5.9.2	Site Supervisor Obligations.....	26
5.9.3	Huracan Senior Management Obligations.....	27
5.10	Incident Investigation.....	27

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 2 of 46

5.10.1	Responsibilities .....	27
5.11	Hazard and Risk Assessment.....	28
5.12	Hazardous Materials .....	29
5.13	Noise Levels .....	30
5.14	Fire Prevention .....	30
5.15	Compressed Gas Cylinders.....	30
5.16	General Housekeeping.....	31
5.17	Work Permits.....	31
5.17.1	Pressure Testing.....	32
5.17.2	Hot and Cold Work.....	32
5.17.3	Confined Space Entry .....	32
5.17.4	Working at Heights .....	33
5.17.5	Electrical Work .....	34
5.18	Inspection, Testing and Maintenance of Plant & Equipment .....	34
5.19	Excavations .....	34
5.20	Safe Work Procedures (SWP's) .....	35
5.21	Vehicle, Plant and Equipment Movements and Control.....	35
5.22	Lifting and Hoisting Equipment .....	36
5.23	Mobile Lifting Equipment .....	36
5.24	Operating Mobilisation Procedures.....	37
5.25	Working in Hot Environments .....	37
5.26	Stepping, Handling and Lifting.....	37
5.27	Management of Change .....	37
6.0	Injury Management.....	38
7.0	First Aid .....	39
8.0	Emergency Management .....	40
9.0	Business Continuity Management .....	40
10.0	Contractor Management .....	41
11.0	Statutory Acts & Regulations .....	41
Appendix A – Huracan Risk Matrix.....		43
Appendix B – Residual Risk Approval .....		44
Appendix C – HSSE Classification .....		45

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 3 of 46

## 1.0 DOCUMENT CONTROL

### 1.1 REVIEW AND UPDATE PROCEDURES

This document is a 'live' document that shall be reviewed and updated as per the Huracan Document Control and Revision Standard.

It is also to be reviewed immediately after any of the following occur;

- Major operational incident (i.e. increased apparent risk)
- Significant operational, procedural, work practice or technology change
- New or amended safety codes, safety requirements or standards are issued.
- When required by relevant State and Federal Government legislation.

Huracan Management is responsible for the review and revision of this document. The updated document is to carry a new revision date, and are circulated once the revision has been approved, by the following levels of Management:

- Operations Manager – Huracan.
- HSE Manager – Huracan.

### 1.2 DOCUMENT DISTRIBUTION

Requested changes to the Distribution List are to be addressed to Huracan Management.

Copy	Name	Position	Company
1	Jon Hollingworth	Operations Manager	Huracan Pty Ltd
2	Katrina Hollingworth	HSE Manager	Huracan Pty Ltd

### 1.3 DOCUMENT UPDATES

Only registered copies of the document shall be updated. This document becomes uncontrolled when printed.

### 1.4 DOCUMENT PUBLICATION AND DISPLAY

This document shall be displayed at all times and shall be open for inspection by anyone to whom the plan or part of the plan may affect or apply to.

### 1.5 NOTICE - DISPLAY LOCATIONS

This document shall be available for display at the following locations;

- Huracan Office

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 4 of 46

- Huracan Internal Website

## 2.0 OVERVIEW

### 2.1 INTRODUCTION & PURPOSE OF DOCUMENT

The purpose of this document is to detail the Health, Safety and Environment Management requirements for Huracan Management, Employees, Contractors and Site Visitors whilst performing operations on any Huracan work sites.

The document aims to provide procedures and standards to reduce identified risks at Huracan work sites to “as low as reasonably possible”, (ALARP).

This document aims to identify and clarify the critical responsibilities where there are multiple plant and contractor/owner relationships or coordination arrangements and to establish the Health, Safety and Environmental management for contractor’s/plant owners whilst performing operations on a worksite.

The HSEMP implemented, is designed to meet the requirements of;

- Petroleum & Gas Act 2004
- Petroleum & Gas Regulations 2004
- Workplace Health and Safety ACT 1995
- Workplace health & Safety Regulations 1997
- AS/NZS Standards 9000-2005
- AS/NZS 4801
- ISO 14001:2004

### 2.2 HSE OBJECTIVES, GOALS AND TARGETS

Huracan Pty Ltd is aware of its obligation to provide a safe work environment for all personnel associated with its operations. To meet this objective, Huracan is committed to developing and maintaining an environment that ensures the Safety and Health of all employees, contractors, visitors and communities associated with our operations.

To achieve this, Huracan shall maximise the integration of HSE policies into all its activities by ensuring that:

- Systems and resources are in place to enable effective and appropriate HSE performance.
- Plant and equipment is maintained and operated in compliance with approved practices and procedures.
- Contractors and visitors reciprocate this integral involvement and commitment to HSE management.
- Employees and contractors at every level understand their responsibility and accountability and have the skills to deliver the required HSE performance.
- A culture is fostered and maintained at Huracan that values HSE commitment,

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 5 of 46

teamwork and performance.

**Key components to the above objectives are:**

- Senior Management demonstrating strong leadership and participation in a robust and proactive approach to HSE management.
- Management at all levels setting goals, plans and appropriately maintained and monitored performance measures to achieve desired HSE outcomes.
- Huracan shall assess its success in achieving HSE objectives by using performance indicators such as:
  - LTIFR - Lost Time Injury Frequency Rate
  - MTIFR - Medical Treatment Injury Frequency Rate
  - HPIFR - High Potential Injury Frequency Rate
  - TRIFR - Total Recordable Injury Frequency Rate
- Management, employees and contractors integrating HSE into all aspects of planning, operational decisions and change management.
- The identification, assessment and appropriate control of the hazards and risks associated with every task.
- Developing Hazard Management Plans for hazards assessed as having high inherent risk.
- Consultation and two-way communication across all levels of the employee and contractor workforce.
- Reporting and adequately investigating and addressing all hazards and incidents (including near miss, property damage and interruption to process) based on potential rather than actual outcome.
- Empowering the workforce with the accountability that if something cannot be done safely then it shall not be done.
- Maintaining a system for appropriately recording, identifying, and tracking site HSE trends, actions, accountabilities and outcomes and to ensure site retention of learning's.
- Document control to ensure the maintenance, currency and availability of critical HSE information.
- The continuous monitoring, including regular internal and external safety audits, review and improvement of HSE management systems at Huracan.

In addition to the primary and proactive focus on the prevention of all incidents, Huracan shall have in place systems enabling the identification of and timely and appropriate levels of response to any adverse or potentially adverse HSE related matters, which may arise.

To achieve this Huracan shall maintain, continuously monitor and regularly test a site Emergency Management Plan which shall include:

- The provision of adequate plans, maps, training and drills to ensure all person's working in Huracan operations are aware of and able to comply with their applicable responsibilities for relevant emergency response procedures.
- The identification and maintenance of appropriate levels of qualified first aid coverage on site.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 6 of 46

- Place plans or programs aimed at enabling the timely and appropriate response to matters involving:
  - Rehabilitation and Return to Work;
  - Workers Compensation Management;

## 2.3 SCOPE OF SERVICES AND DESCRIPTION OF THE PLANT

Huracan is supplying contract services to the client. The services provided may comprise of, but not limited to the following;

- Machinery mobilisation to well/work sites.
- Rig up and rig down of operating plant.
- Pressure testing operations.
- Gas detection and contaminated atmosphere testing operations.
- Working at heights operations.
- Other operations as requested by the client and agreed to by Huracan.

## 2.4 CODE OF CONDUCT

Huracan Management requires full compliance with the HSE Plans, Emergency Response Plans and Safe Work Procedures. Infringement of the Policies contained in the HSMP, EMP, ERP and Safe Work Procedures shall be regarded as a serious breach of the Huracan code of behaviour and shall result in disciplinary action, which may include counselling or dismissal. Failing to follow safety instructions, deliberately interfering with safety equipment and systems, deliberate damage to equipment, stealing, vandalism, fighting, practical jokes and horseplay shall not be tolerated and are considered to be serious breached of the Huracan's Code of Conduct.

Additional information can be in Huracan's Code of Conduct Policy and Standard.

## 2.5 TERMINOLOGY

Acronym	Meaning
SWP	Safe Work Procedures
HSMP	Health & Safety Management Plan
EMP	Environmental Management Plan
JSA	Job Safety Analysis
TBM	Tool Box Meeting
ALARP	As Low as Reasonably Practicable
API	American Petroleum Institute
APPEA	Australian Petroleum Production & Exploration Society
IADC	International Association of Drilling Contractors
AQTF	Australian Quality Training Framework
AFD	Incident Free Days

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 7 of 46



ERP	Emergency Response Plan
PPE	Personal Protective Equipment

## 3.0 SAFETY MANAGEMENT

### 3.1 HEALTH, SAFETY & QUALITY POLICIES

Huracan Pty Ltd has policies to emphasise the importance Huracan Management places on the Health, Safety and Environment in which it operates.

These policies form the basis of Huracan's Health, Safety and Environment Management plan.

#### 3.1.1 HEALTH AND SAFETY POLICY

Huracan places utmost importance on the health and safety of its core assets and its personnel. The Management, Employees and Contractors of Huracan recognises its obligation to take all reasonable precautions to provide and maintain an environment that is safe and without risks or injury.


##### Management Responsibility

- Establish and maintain a Health, Safety & Environmental Management system that facilitates a structured approach to the management of risk.
- Provide adequate human, financial and time resources to ensure the effectiveness of the system.
- Remain up-to-date with relevant health and safety legislative obligations and achieve and maintain compliance with these obligations.
- Promote a Safety Culture that encourages people to proactively manage risk through education, instruction, information and supervision.
- Clearly define and communicate to staff, contractors and contractors, their responsibilities in relation to health and safety.
- Proactively identify and manage health and safety risk via a documented hazard identification, risk assessment, risk control and monitoring process.
- Improve processes to ensure that incidents and hazards are promptly reported, investigated and control measures are put in place to eliminate or minimise a repeat event.
- Maintain building infrastructure, plant and equipment in a safe condition with documented safe systems of work.
- Routinely monitor and review HSE performance to achieve continual improvement.

##### Employees Responsibility

All employees shall comply with the HSE Manual generally and:

- Shall take all reasonable care for their own health and safety and that of others who may be affected by their conduct at the workplace.
- Shall not recklessly interfere with or misuse anything provided in the interests of health and safety or welfare and shall co-operate with Huracan in relation to actions taken by Huracan to comply with workplace health and safety legislation.
- Shall not place at risk, the health and safety of any person in the workplace.

Signed: 

Date: 5-Jul-2019

**Jon Hollingworth**  
Managing Director

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 8 of 46

## 3.1.2 SUBSTANCE ABUSE POLICY

Under the Workplace Health and Safety ACT 1995, Huracan accepts our responsibility to ensure environments are safe for employees as well as all others on site. In doing so, Huracan is striving to create a workforce of the highest professional conduct, who are committed to excellence in their manner and conduct. To ensure these standards are met, management acknowledges the importance of ensuring that all employees undertake their duties in a professional manner, free from the influence of alcohol and other drugs.

This policy applies to all employees of Huracan including those staff who are itinerant.

### OUR PRINCIPLES ARE:

- The misuse or abuse of alcohol and other drugs is of concern to Huracan when workplace safety, illegal activities in the workplace or an employee's performance or conduct is an issue
- Managers and staff have obligations and responsibilities as set out in this policy in relation to dealing with performance or conduct issues in the workplace that arise from the effects of alcohol or other drugs.
- Staff dealt with in terms of this policy shall receive appropriate assistance and support in order to attain an acceptable standard of work performance and conduct. This may include participation in counselling, treatment or rehabilitation programs. Any evidence of possible criminal activities in regard to the use of illegal drugs shall be dealt with in accordance with Huracan statutory and legal obligations.
- *Personal information received from staff shall be dealt with relating to this policy shall be treated in strict confidence.*

Huracan recognises that the misuse of alcohol and other drugs can often be due to associated emotional, physiological and psychological factors. Therefore, this policy shall be applied with consideration for the individual, maintaining confidentiality and respecting the rights of staff who may have physical or psychological condition associated with alcohol and/or drug abuse.

### Huracan does not permit:

The consumption of alcohol or other drugs while on our worksites or premises, or at any facilities to which we supply, except with the approval of Management, which is to be given in advance.

### Huracan reserves the right to:

- Implement performance management programs, counselling and/or disciplinary action in respect to any staff in breach of this policy.

All employees are required to be familiar with this procedure and act in accordance with their responsibilities as set out in the Drug and Alcohol Policy.

Any grievances resulting from the implementation of this Policy shall be dealt with under our Staff Resolution Procedures.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 9 of 46

Signed: 

Date: 5-Jul-2019

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**Jon Hollingworth**  
**Managing Director**

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Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page <b>10</b> of <b>46</b>

## 3.1.3 DRIVING AND JOURNEY MANAGEMENT POLICY

HURACAN PTY LTD recognises that driving is a high risk activity. To minimize this risk and ensure consistent standards for driving qualification and practices are followed, this Policy applies for all business activities. This policy also provides the foundation for building a driver improvement program at the field level.

### OUR PRINCIPLES ARE:

- Journey management must be planned and approved prior to conducting trips of a distance greater than 50km from point of origin.
- The driver must have an appropriate, valid license for the vehicle they are driving.
- Seat belts are a condition of employment and must be worn by the driver and passengers at all times.
- Driving improvement monitors will be used in all company vehicles and driver performance reviewed on a monthly basis. Tampering with driving improvement monitors is strictly prohibited.
- Driving under the influence of drugs and / or alcohol over legal limits is strictly prohibited.
- The use of mobile phones / hand free while driving is strictly prohibited.
- Speed limits are to be adhered to at all times.

Failure to comply with HURACAN PTY LTD driving and journey management principles is disciplinary action up to and including termination of employment.

Signed: 

Date: 5-Jul-2019

**Jon Hollingworth**  
**Managing Director**


Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 11 of 46

## 3.1.4 TRAINING POLICY

Huracan is committed to Continuous Improvement and Effective Employee Workplace Training and Self Advancement Programs to ensure the highest standards in Safety, Efficiency and Productivity across all Operations.

**To meet its Training Policy Commitment Huracan shall:**

- Ensure all Employees are properly trained in all workplace procedures they are asked to perform.
- Give priority to incorporating relevant work related training programs for all Employees and Management.
- Implement accredited Employee Workplace Training that aligns with National Competency Standards where applicable.
- Conduct regular performance reviews with all Employees and Management to identify training and development needs to meet the individual and Huracan Drilling's business objectives.
- Evaluate training and development activities to monitor their effectiveness.
- Promote a culture that values training and development, so that Employees have the opportunity to reach their potential.
- Support employees who of their own initiative undertake and successfully complete accredited work related educational courses.
- Maintain all Employees' training records and utilise those records to perform 'gap analysis' to ensure that Employees receive relevant training needs.

Signed: 

**Date: 5-Jul-2019**

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**Jon Hollingworth**  
**Managing Director**

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 12 of 46

## 3.1.5 REHABILITATION POLICY

HURACAN PTY LTD recognises that there are substantial benefits to be gained from rehabilitation principles and practices and is committed to implementing them at this workplace. We recognise that the **Workers' Compensation and Rehabilitation Act 2003 and the Workers' Compensation and Rehabilitation Regulation 2003** provide the legislative support for workplace rehabilitation activities.

Experience has shown that workplace rehabilitation assists the healing process and helps restore the worker's normal function sooner. Workplace rehabilitation includes early provision of timely and adequate services, including suitable duties programs, and aims to:

- Maintain injured or ill workers at work.
- Ensure the worker's earliest possible return to work.
- Maximise the worker's independent functioning.
- Provide for durable employment.

This policy has been developed as a joint worker-management agreement.

### HURACAN PTY LTD is committed to:

- Providing a safe and healthy work environment, but in the event of an injury or an illness, making sure workplace rehabilitation is started as soon as possible in accordance with medical advice.
- Ensuring appropriate suitable duties are made available to injured or ill workers to facilitate their safe and early return to work. These duties shall be consistent with the current medical certificate and shall be time limited.
- Respecting the confidential nature of medical and rehabilitation information and ensuring there shall be both verbal and written confidentiality.
- Ensuring all workers are aware that in the event of injury or illness, they shall be consulted to ensure a structured and safe return to work that shall not disadvantage them.
- Complying with legislative obligations with respect to the standard for rehabilitation.
- Adopting a multidisciplinary approach to rehabilitation as required.
- Workplace rehabilitation procedures have been developed to support this policy. The procedures define key terms, describe key roles and outline steps in the return to work process.

Our rehabilitation and return to work coordinator is Katrina Hollingworth .....insert

Signed: 

Date: 5-Jul-2019

**Jon Hollingworth**  
**Managing Director**

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 13 of 46

## 3.1.6 RIGHT TO STOP WORK POLICY


Huracan Management supports the policy that any person has the right to stop work and seek further clarification about a task, without fear of reprisal, if they feel that their Health, Safety or Welfare is compromised whilst working on Huracan operations.

### To meet its Right to Stop Work Policy Huracan shall:

- Immediately investigate work procedures, controls and review the level of risk of any work that has been halted by any person as a result of Health, Safety and Welfare concerns.
- Give Health and Safety first priority in all Plans, Operating Procedures, Training Programs and Job Instructions.
- Ensure that all Risks and Hazards associated with its Operations are identified and eliminated through the use of appropriate Risk Management techniques.
- If a hazard cannot be practically eliminated, best practice controls shall be adopted to ensure the Risks and Hazards identified are reduced to as Low as Reasonably Practical.
- Educate its Personnel, Contractors and Management about this Policy.

### All Employees, Contractors and Management are obliged to:

- Integrate Health and Safety Considerations into all aspects of their work.
- Immediately Report, Investigate and rectify unsafe Practices and Conditions.

Signed: 

Date: 5-Jul-2019

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**Jon Hollingworth**  
Managing Director

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 14 of 46

## 3.1.7 HEAT STRESS MANAGEMENT POLICY

Huracan Management shall ensure that the potential for Heat Stress is minimised in all Huracan operations and work locations.

### To meet its Heat Stress Management Policy Huracan shall;

- Review this Policy annually or immediately following a Heat Stress related illness.
- Give Health and Safety of Employees first priority by considering the potential for Heat Stress in all Huracan Operations and communicate this to Employees regularly (e.g. tool box meetings).
- Consider the potential for Heat Stress in all Huracan operations and equipment designs and mitigate the potential for Heat Stress by use of appropriate Risk Management techniques.
- Ensure that all Employees receive regular training regarding Heat Stress and ensure that all Employees are aware of the early warning signs of Heat Stress (tiredness, irritability, dark urine colour, headaches, faintness, cramps, etc) and the importance of stopping work, taking relevant preventative action and reporting Heat Stress symptoms early.
- Ensure all Employees are aware of the need and their responsibility to watch over fellow Employees for the early warnings of Heat Stress.
- Provide adequate facilities such as appropriate clothing, water, electrolyte supplements, appropriate shading, cool down areas and appropriate rest periods to minimise the potential for Heat Stress events.

### All Employees, Contractors and Management are obliged to;

- Attend Heat Stress Training sessions.
- Ensure that all personnel watch over co-workers for early signs of Heat Stress.
- Integrate Heat Stress considerations into all aspects of their work.
- Immediately Report and take preventative action when symptoms of Heat Stress become apparent.

Signed: 

Date: 5-Jul-2019

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**Jon Hollingworth**  
**Managing Director**

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 15 of 46



## 3.1.8 CULTURAL HERITAGE POLICY


Huracan Management recognises the need, and is committed to the preservation of Indigenous artefacts and culture.

**To meet its Cultural Heritage Policy Huracan shall:**

- Conduct Operations in accordance within Tenure Holder requirements and policies and by giving due consideration to relevant Cultural Heritage legislation.
- Ensure that all Employees, Contractors and Management are aware of their obligation to not disturb or remove items of cultural significance, (e.g. skeletal remains, stone artefact scatters, stone tools, shell middens, scarred trees, stone arrangements and rock art).
- Ensure that all Employees, Contractors and Management are aware of their obligation to immediately report discoveries of items of cultural significance.

**All Employees, Contractors and Management are obliged to;**

- Give due consideration to cultural heritage issues and their significance in the wider community.
- Immediately report any discoveries of items of cultural significance, (e.g. skeletal remains, stone artefact scatters, stone tools, shell middens, scarred trees, stone arrangements and rock art).
- Conduct Operations in accordance within Tenure Holder requirements with regard to areas of cultural significance.
- Never disturb or remove items of cultural significance.

Signed: 

**Date: 5-Jul-2019**

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**Jon Hollingworth**  
**Managing Director**

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 16 of 46

## 4.0 HSE RESPONSIBILITIES & ORGANISATION

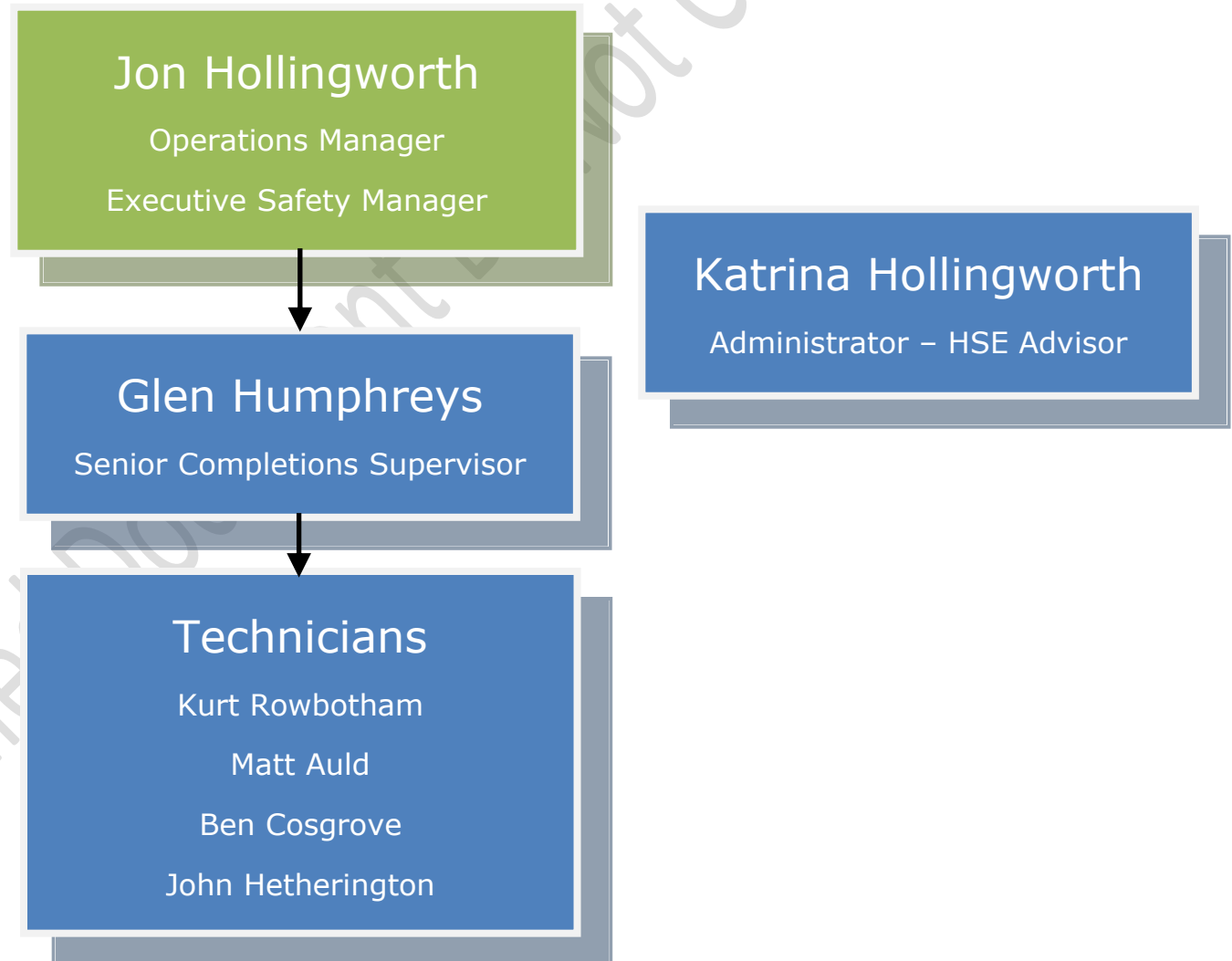
All Employees, Contractors and Management shall comply with and share responsibility for Health, Safety and Environmental Management as outlined in this document whilst conducting operations at Huracan work sites.

The following sections outline the Organisational Structure of Huracan and the relevant HSE responsibilities of each level in the Organisational structure.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 17 of 46

## Huracan HSMP

### 4.1 ORGANISATIONAL CHART



Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 18 of 46

## 4.2 RESPONSIBILITIES & ORGANISATION

### 4.2.1 BOARD OF DIRECTORS - IS RESPONSIBLE FOR:

- Providing direction and endorsement of the Safety Management Plan and ensure its adequacy and the commitment of Management.
- Providing adequate human and financial resources to meet the requirements of the Safety Management Plan and associated programs.

### 4.2.2 SENIOR MANAGEMENT (OPERATIONS MANAGER) – IS RESPONSIBLE FOR:

- Communication to the Board of Directors of all HSE matters to enable the board to discharge its responsibilities listed above.
- Developing, Endorsing and Promoting HSE Policies in the workplace.
- Monitoring workforce compliance with this HSE Plan.
- Promoting communication on safety issues to and from the workforces.
- Allocation of resources as approved by the Board to ensure adequate HSE performance and compliance as outlined in this HSE Plan.
- Ensuring that all Supervisors have the skills and competencies to perform their duties and HSE responsibilities.
- Ensuring that all Supervisors understand their obligations as the most Senior Site based personnel and their responsibility as the designated 'Site Safety Manager' as described in the **Queensland Petroleum & Gas (Production and Safety) Regulation 2004**.
- Staying abreast of legislative and Client Safety requirements and ensuring these are communicated to the workforce.
- Ensure that operations have been adequately risk assessed and relevant controls identified to manage hazards and risks to a level as low as reasonably practicable.

### 4.2.3 SITE MANAGER - IS RESPONSIBLE FOR:

- Ensuring that each person who enters the site is given an appropriate site induction that enables that person to comply with all relevant HSE Policies, Procedures, Safety Management and Emergency Management Plans for the site and that the Induction is relevant to the work/visit that the person shall be undertaking whilst on site.
- Implementing and monitoring for compliance of all HSE Policy, procedures, and the Safety Management Plan for all site based operations.
- Promoting a safe working culture on site.
- Conducting risk assessments and producing site-specific procedures for review and endorsement of Senior Management.
- Monitoring employees' fitness for work and administering appropriate disciplinary procedures in relation to safety breaches.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 19 of 46

- Ensuring that all employees are properly supervised and trained to safely carry out their work.
- Ensure all site based Employees are provided with, and use the appropriate PPE and safety equipment provided, including first Aid equipment.
- Ensuring all equipment is fit for purpose.
- Ensuring that emergency procedures are in place and followed as per the HSE plan.
- Conducting site based Safety Drills and Emergency Response Drills to ensure all Employees understand and are competent at performing their designated roles in respect of Safety and Emergency drills.
- Conducting daily inspections and maintaining the site in safe condition.
- Acting on any site safety issues as they arise and keeping Senior Management informed.
- Conducting regular Toolbox Meetings and promote communication and feedback to both the workforce and Senior Management on all matters relating to operations and safety.

## 4.2.4 EMPLOYEES AND CONTRACTORS - ARE RESPONSIBLE FOR:

- Complying with all reasonable directions of the Site Supervisor and Site Manager and the HSE Plan.
- Their own safety and for those around them.
- Understanding, familiarizing themselves and comply with Safe Work Procedures and the HSE Plan.
- Seeking clarification on work instructions and requirements if unsure how to proceed with any task.
- Reporting, and immediately acting on any unsafe practices, unhealthy conditions and hazards as they are identified.
- Practicing safe work methods.
- Correctly using and maintaining all tools, equipment, plant and materials.
- Correctly using and maintaining all safety devices and personal protective equipment.
- Reporting all injuries, equipment damage and near miss incidents to their supervisor.

## 4.2.5 HSE MANAGER - IS RESPONSIBLE FOR:

- Review and update of the HSE Plan.
- Regular site visits as required by Senior Management to review compliance with the HSE Plan.
- Advising Senior Management on HSE responsibilities.
- Preparing formal audits of the HSE plan and advising Senior Management of necessary action plans.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 20 of 46

## 4.3 HEALTH SAFETY & ENVIRONMENTAL DOCUMENTATION

Huracan shall record and document HSE information via the following reporting mechanisms;

- Work/Well Site Safety Induction.
- Journey Management procedure and use of the Site Safety Board System.
- Daily Toolbox Meetings (Verbal at the beginning of each work shift) & Stepback.
- JSA documentation and Risk Assessment via approved Risk Matrix.
- Hazard identification and reporting procedure in HIRD (Huracan Incident Reporting Database).
- Use of the Wellsite Permit to Work System.
- Weekly Safety Meeting (documented).
- Site Supervisor (Site Safety Manager) documented Handover.
- Adherence to the requirements of this HSE Plan, Emergency Response Plan and Safe Work Procedures.
- Distribution of relevant Industry related Safety Alerts and Publications.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 21 of 46

## 5.0 PROCEDURES

### 5.1 GENERAL AND SITE BASED EMPLOYEE INDUCTIONS

All personnel are required to complete a general induction prior to commencement of work in the field. Records of attendance and assessment shall be held in each employee's personnel file.

All personnel are also required to complete a Site based (Level 3) induction program. The induction program shall cover the following:

- General Site Safety Requirements (both Huracan and Client requirements).
- Chain of command on site and identification of the designated Site Safety Manager.
- Requirement to abide with safety and general work instructions.
- Existence and location of the HSE Plan, Emergency Response Plan, Safe Work Procedures and general Company Policies (Huracan and Client policies).
- Emergency signals, Muster Point locations, location of emergency shut downs, location and use of emergency numbers and communication equipment and emergency procedures in use on site.
- The requirement for all personnel to report all hazards and incidents immediately to the Site Safety Manager, (Site Supervisor).

Induction records shall be kept on site and in the main Roma Office for a period of 12 months. Personnel who have not attended a Huracan work site for a period greater than 6 months shall be obliged to complete site the induction process.

### 5.2 NEW AND INEXPERIENCED EMPLOYEE MENTORING SYSTEM

New and inexperienced employees are considered at higher risk of incidents and as a result Huracan has a New and Inexperienced Employee mentor system. During the period of the induction process the Operations Manager will assign a mentor to the new hire employee. The mentor will be responsible for assisting the New Employee in orientation of Huracan work practices and policies for the period of time as deemed by the Operations Manager.

The new employee will also be required to wear a Green Hardhat for a period as specified below:

- One year for a new employee with no previous industry or trade experience
- Six months for new employee with more than two years of trade experience
- Three months for a new employee with less than two years of industry experience
- One month for a new employee with greater than two years of industry experience

### 5.3 TRAINING AND DEVELOPMENT

Ongoing training and development of all personnel irrespective of position, is central to Huracan's vision of providing an efficient organisation and workforce.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 22 of 46

Through training and development, Huracan hopes to assist employees to achieve personal achievement and development, job and career satisfaction and a Healthy and Safe work environment.

Competency based training of Huracan personnel shall involve a mixture of class room based training modules, on the job training and self-study programmes where appropriate.

A training matrix is used to record both training requirements and training that has been completed by all Huracan personnel (Copies of the training matrix shall be held on the Huracan internal website).

Each employee position description shall identify the requisite knowledge requirements, skill set and experience required for that position.

A gap analysis shall then be performed for each employee against their designated position description to identify training needs.

In performing the gap analysis for training needs, employees shall not be placed in a position where they do not have the necessary skills to complete a task safely and skills training shall be competency based and assessed accordingly.

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### 5.3.1 QUALIFICATIONS, CERTIFICATES AND LICENSES

Huracan senior management shall confirm the validity of potential employee's qualifications, certificates and licences.

Prior to and during ongoing site operations, the HSE Manager shall be responsible for carrying periodic checks (incoming crew change day is a good time) to ensure that personnel hold the relevant certificates and qualifications for tasks that they shall be performing and that those certificates and qualifications have not expired.

Huracan senior management shall be immediately informed of any non-compliance before those personnel are authorised to commence operations.

Any personnel not holding the relevant certificates, licences or qualifications may only continue with operations if approved by Huracan senior management or they are undergoing approved training and are appropriately supervised.

## 5.4 SUBSTANCE ABUSE (DRUG AND ALCOHOL)

A "Zero Tolerance" to drug and alcohol shall apply to all Huracan field operations as per the Huracan Drug & Alcohol Policy to ensure the Health, Safety and Welfare of all personnel is maintained.

In accordance with the Huracan Drug and Alcohol Policy, pre-employment screening, ongoing

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 23 of 46



random screening and 'for cause' testing shall be implemented to ensure compliance with the policy.

Non-compliance with the Policy shall lead to serious disciplinary action or termination of employment.

Refusal to undertake requested testing is considered a breach of the Drug and Alcohol Policy and persons refusing to test shall be removed from site shall be subject to counselling and/or further disciplinary action which may include termination of employment.

### 5.5 PERSONAL PROTECTIVE EQUIPMENT

Huracan shall supply the relevant PPE to ensure that tasks are able to be carried out safely. The relevant PPE shall be identified during JSA and risk assessments and shall be outlined in the relevant SWP for the particular task.

The minimum PPE whilst on any Huracan work site shall be:

- Long sleeve cotton shirts and long cotton trousers.
- Steel capped safety boots.
- Hard Hat.
- Safety Glasses.

Additional protective clothing or equipment shall be worn where required for specific tasks as defined by JSA's, MSDS's and SWP's. These may include but are not limited to.

- Hand protection.
- Hearing protection.
- Radiation Dosimeter.
- Face Shields.
- Breathing apparatus.
- Aprons.
- Rubber gloves and/or boots.
- Fall protection equipment.

Failure to comply with safety warning, failure to use PPE or tampering with PPE and safety equipment shall lead to serious disciplinary action and the possibility to termination of employment.

### 5.6 SAFETY AND HAZARD WARNING SIGNS

Safety and hazard warning signs shall be displayed as appropriate throughout the worksites and shall conform to the requirements of **AS 1319 - Safety Signs for the Occupational**

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 24 of 46

## Environment.

**Note: Signs may be symbolic (picture) only, text only or a combination of the two forms and warning signs shall be displayed to ensure the greatest visibility within the work area.**

Condition and placement of signs shall be checked during every rig and workplace inspection. The Driller and Site Supervisor are responsible for ensuring the replacement or relocation of signs as necessary.

The removal, intentional damage or defacement of warning signs may result in disciplinary action.

## 5.7 HSE MEETING REQUIREMENTS DURING OPERATIONS

The Site Supervisor shall be responsible for the allocation of adequate time for Safety Meetings to occur on site prior to and during site operations.

Safety Meetings shall be held as follows:

- Pre-spud inspection and Pre-Spud Safety meeting (Huracan shall attend if work tasks permit).
- Daily Toolbox meetings prior to the commencement of the days shift.
- Toolbox meetings prior to the commencement of a new task.
- Toolbox meeting when operations call for deviation from SWP's (a written JSA is also required).
- Weekly Safety meeting (documented).

## 5.8 INSPECTIONS AND AUDITS

### 5.8.1 INTERNAL INSPECTIONS AND AUDITS

An Audit and inspection schedule is to be developed at the beginning of the year to include location specific requirements to be compliant to Huracan HSSE management system.

The Operations Manager shall be responsible for conducting regular site inspections and audits to ensure all operations comply with HSE requirements.

Inspections and audits shall include (but is not limited) the following documents:

- Daily Start-Up Checklists.
- Emergency Response Drills.
- Fire Extinguisher checklist.
- First Aid Kit checklist.
- Gas monitoring register.
- Harness & Lanyard checklist.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page <b>25</b> of <b>46</b>

- Lifting Gear checklist.
- Site Inspection checklist.
- Third Party Contractor audit.

Audits and inspections shall be recorded with applicable action items in HIRD.

### 5.8.2 EXTERNAL INSPECTIONS AND AUDITS

Action items from all audits shall form the basis of Huracan's commitment to continuous improvement with regard to HSE issues. The audit process shall also ensure that operations comply with the requirements of the **Queensland Petroleum and Gas (Production and Safety) Act and Regulation 2004**.

## 5.9 HAZARD AND INCIDENT REPORTING

An incident is defined as an unintended outcome or situation that caused or had the potential to cause a HSSE or SQ accident.

All employees and visitors have an obligation to report all hazards and incidents to Huracan senior management via the Site Supervisor.

Huracan Senior Management shall then report as necessary to client management and Government Regulatory Authorities depending on the nature and severity of the incident as soon as reasonably practicable. All hazards and incidents shall be reported via the HSSE report in HIRD.

### 5.9.1 INDIVIDUAL OBLIGATIONS

Individuals have an obligation to eliminate, guard against or protect themselves and others from any hazards as soon as they are recognised.

Recognised hazards shall be reported immediately to the Site Supervisor.

If there is imminent danger, the person recognising the danger shall:

- Immediately take all reasonable steps to isolate the danger by stopping work and/or evacuating the area.
- Immediately report all hazards and incidents to the Site Supervisor for immediate investigation.

### 5.9.2 SITE SUPERVISOR OBLIGATIONS

- The Site Supervisor shall immediately carry out investigations to control or remove any hazards that have been reported.
- Where a hazard cannot be immediately removed or controlled the site supervisor shall ensure that all work is suspended.
- The Site Supervisor shall also report any Hazard immediately to Huracan Senior

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 26 of 46

Management.

- The Site Supervisor in conjunction with Huracan Senior Management shall then perform the necessary Risk Assessment, recommend and approve control or substitution methods before work is approved to re-commence.

## 5.9.3 HURACAN SENIOR MANAGEMENT OBLIGATIONS

Huracan senior management shall immediately investigate all hazards/incidents and incident reports and approve any changes to SWP's, control measures or modifications to plant before work re-commences.

Additionally, senior management shall ensure that the relevant statutory authorities are informed of all incidents particularly with respect to prescribed incidents as outlined in the **Queensland Petroleum and Gas (Production and Safety) Act and Regulation 2004**.

The main Huracan office in Roma shall maintain the following records;

- All Hazard, incident and Incident forms
- All Hazard, incident and Incident investigations
- All JSA, risk assessment reports and records
- Workers compensation reports
- Reports to and from the relevant statutory authorities

## 5.10 INCIDENT INVESTIGATION

All recordable incidents, high risk and near miss incidents shall be investigated by Huracan Senior Management.

Incident investigations are required to determine causes of these events and to assist with continuous improvement of operations and prevent re-occurrence of these events.

The investigation and report shall be completed within 48 hours of the incident and shall include written statements from all personnel involved.

On review of the initial report, Huracan Senior management shall determine if further investigation is required, (e.g. causal analysis/tap root).

Incident reports shall also be copied to the Chief Inspector of the Queensland Department of Mines and Energy as required by the **Petroleum and Gas (Production and Safety) Act and Regulation 2004**.

All initial incident investigation reports shall be initiated by the Site Supervisor on site using the Incident investigation report form. These reports shall be immediately forwarded to Huracan Senior management.

### 5.10.1 RESPONSIBILITIES

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 27 of 46

## Huracan Senior Management

- Ensure all incidents and injuries are properly investigated.
- Ensure immediate and long term corrective actions are taken to prevent reoccurrence of incidents and incidents.
- Maintain Incident Reports permanently on file.

## Huracan Site Managers

- Conduct immediate initial Incident investigations.
- Report all incidents to Huracan Senior Management with one (1) after the event.
- Collect and preserve all evidence that may be useful in an investigation.
- Conduct interviews of witnesses in a professional manner.
- Do not attempt to find or assign blame for incidents.
- Take action to protect people and property from secondary effects of incidents.

## Employees/Contractors

- Assist as requested in all incident investigations.
- Provide statements as requested.

## 5.11 HAZARD AND RISK ASSESSMENT

The HSE Manager, Safety & Training Coordinator (if present) and Crew shall identify hazards and potential consequences of identified hazards by analysis of the proposed work to be performed.

The purpose of hazard identification, assessment and control is to minimise the likelihood of an incident occurring.

The potential consequences of each hazard observation shall be assessed and a control strategy developed to eliminate the occurrence of the hazard, and/or minimise its effect to a level that is “As Low as Reasonably Practicable” (ALARP).

Selection of the Hazard Identification and assessment process may be by one or a combination of any of the following techniques:

- Workplace Inspections.
- Job Safety Analysis (JSA).
- Hazard Analysis Workshop.

### Important Notes:

For any new activity or non-routine/standard work, a task specific JSA shall be prepared at the worksite.

The JSA can be generic but must be reviewed to ensure relevance by the work group or personnel involved with performing the task.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 28 of 46

The Site Supervisor and Crew are required to conduct JSA's in accordance with the Permit/SWP/JSA Flowchart.

The Site Supervisor shall specify the most appropriate Hazard Identification and assessment process to be used in any analysis, and ensure that where possible it is carried out consultatively with the workgroup.

Matters to be considered shall include:

- The type of hazard.
- The size and layout of the workplace.
- The frequency potential of the hazard.
- The consequence of injury, damage or loss likely to occur as a result of being exposed to a hazard.
- The number of employees and where they are located.
- The distance from the workplace to the nearest available emergency service.
- Systems of communication for all employees to enable contact with emergency services.
- Information available on Material Safety Data Sheets (MSDS) relating to first aid measures.
- Journey Management.

Hazards associated with specific tasks shall be assessed consultatively using experienced personnel and personnel required to carry out the activity.

The identified hazards are to be documented and alongside them possible risk, consequences, and control strategies noted in the Hazard Register.

The Hazard Register shall be placed on notice boards and made available to all site personnel. Hazard Observation Forms (booklets) shall be supplied to all personnel to record and advise the Safety & Training Coordinator/Site Supervisor of identified hazards/near miss situations.

A Hazard & Corrective Actions Register (HCAR) has been developed for Huracan operations and this shall be updated monthly with information from hazard and risk assessment procedures conducted at each drilling site. An updated HCAR shall be circulated monthly to each item of Plant.

### 5.12 HAZARDOUS MATERIALS

Huracan shall maintain material data safety data sheets (MSDS) for all chemicals held on site. The MSDS's shall be available to all site personnel for review to ensure that correct chemical handling procedures and PPE requirements are being met.

The Site Supervisor shall also maintain a hazardous material register on site. Copies of the register shall be forwarded to the Huracan head office when updates are made.

All flammable and hazardous goods shall be stored in accordance with relevant government legislative requirements and relevant Australian Standards.

\* Chemical Register form

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 29 of 46

## 5.13 NOISE LEVELS

Machinery noise emitted from plant shall be monitored by the Site Supervisor. Excessive noise shall be considered as hazardous to personnel and be entered on the Hazard Register (<85dB for an 8-hour period).

The Site Supervisor shall either suspend operations and/or implement appropriate control procedures and mechanisms if work activities and plant emit noise at levels beyond those permitted or recommended.

Each item of Plant and Equipment shall have a noise level monitoring and mapping study performed. Re-testing shall occur as required and if changes are made to equipment or additional equipment is introduced.

## 5.14 FIRE PREVENTION

**The Site Supervisor and HSE Manager shall ensure that:**

- There is adequate Fire Protection measure in place on site.
- Adequate numbers and the correct type of fire extinguishers are available on site and are properly maintained, (as per the audit and inspect schedule).
- The Crew are aware of general fire restrictions, the risk of ignition and the potential spread of fire throughout the various areas of the operation.
- All vehicles, plant and equipment have appropriate fire extinguishers and are correctly maintained.

The Site Supervisor and Contact Safety Advisor shall ensure that all personnel on site are aware of the location of all firefighting equipment and the correct use of the equipment.

The Site Supervisor and HSE Manager shall ensure that there is documented evidence of employee training in the use of firefighting equipment and shall be responsible for conducting inspections as per the Audit and Inspection Schedule, using the Extinguisher Checklist and Fire Extinguisher Register.

## 5.15 COMPRESSED GAS CYLINDERS

All compressed gas cylinders are to be secured by means of a chain, clamp or rope in an upright position. Empty cylinders may be laid down provided that valves are protected from possible damage and suitably chocked to prevent rolling. Empty cylinders shall be clearly marked with chalk as "empty".

Cylinders shall be stored in a ventilated area out of direct sunlight, secured in the upright position and have signage displaying the class of the gas stored.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 30 of 46

Signage can be placed on designated cylinder storage areas or in a storage pallet designed for the purpose of storing compressed gas cylinders. A fire extinguisher shall be within close proximity of oxy-acetylene sets and cylinders.

### 5.16 GENERAL HOUSEKEEPING

All personnel are responsible for ensuring that their work areas and vehicles are kept clean and tidy at all times.

The Site Supervisor shall be responsible for ensuring that all waste material is segregated and disposed of correctly at the rig and camp sites.

### 5.17 WORK PERMITS

Huracan shall utilise the Onshore Wellsite Permit to Work Systems on all well sites. The Site Supervisor shall approve permits as required by the permit system. A permit/SWP/JSA Flowchart shall be posted on notice boards in the Site Managers Office and in the site 'smoko' shack.

The objectives of the Permit System are to ensure that:

- People, environment, equipment and product are protected.
- Safe working practices are followed.
- The work site is inspected and all necessary precautions have been considered and implemented before work commences.
- The work is performed only on the specified equipment.
- The location of people and the type of work being carried out are always known shall an emergency occur.
- The person(s) carrying out the work understands the conditions under which work may be carried out.
- The equipment to be worked on has been correctly prepared for the work to be carried out.
- Correct protective measures are available and are being used.
- The work being done is carefully monitored.
- The work site is left in a clean and safe condition upon completion of the work.
- The details of non-completed work are documented and communicated to the Permit Authority.
- Equipment left unserviceable is correctly tagged and identified for incoming shifts.

The Site Supervisor shall ensure that requirements of the Wellsite Permit to Work System are followed.

The WSPTW system shall be used for the following activities;

- Pressure Testing
- Hot and Cold Work
- Confined Space Entry
- Handling of Explosive or Radioactive Substances/Tools
- Working at Heights

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 31 of 46



- Electrical Work

## 5.17.1 PRESSURE TESTING

A Pressure Systems Work Permit is required for any work involving equipment which is under pressure, may be under pressure, or any work involving pressurised operations.

Toolbox meetings in conjunction with permit preparation as per the WPTW system are required before commencing any pressure testing operations.

Before commencement of any pressure test, the Site Supervisor shall:

- Review with crews any SWP's for pressures testing of particular equipment
- Issue a pressure systems work permit as per the requirements of the WPTWS and ensure all controls are in place before work commences
- Ensure that all instruments and gauges are suitable for the expected pressure

## 5.17.2 HOT AND COLD WORK

Cold work permits are required for work carried out that is non-standard, shall not generate any source of ignition, such as flame, spark or temperature sufficient to ignite any flammable material and is not covered by any other permits.

A toolbox meeting in conjunction with permit preparation as per the WPTW system is required. Hot work permits are required for work which could generate fire, naked flame, heat, spark or other source of ignition, and is located anywhere on the Wellsite other than within an approved maintenance or welding workshop or designated smoking area, provided that workshop or area is not within 45 metres of the well or other source of flammable vapour.

A toolbox meeting in conjunction with permit preparation as per the WPTW system is required.

## 5.17.3 CONFINED SPACE ENTRY

A Confined Space Entry Work Permit is required whenever entry into a confined space is required as defined below. A confined space is a space of any volume which:

- Is not intended as regular workplace.
- Has restricted means of entry and exit.
- May have inadequate ventilation and/or atmosphere which is either contaminated or oxygen deficient.
- Is at atmospheric pressure during occupancy.

Confined Space Entry is the entry of a person's upper body/head into a confined space. Examples

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 32 of 46

of confined spaces include, but are not limited to:

- Storage tanks, mud tanks and other tank like compartments usually having only a manway for entry,
- Open-topped spaces of more than 1.5 metres in depth such as pits and well cellars, which are not subject to good natural ventilation,
- Pipes, tunnels, shafts, ducts and similar structures,
- Fabricated metal enclosures such as inlet and exhaust plenums.

A Confined Space Entry Permit only authorises entry into a confined space.

Any work done inside a confined space is subject to the normal safety requirements for such work and the appropriate Wellsite Permit to Work.

Work in any confined space shall not be permitted to commence unless:

- Permits have been obtained from permit authority.
- Conditions contained in the Confined Space Entry Procedure have been complied with.
- Such measures have been carried out to ensure the confined space is not unsafe and shall not become unsafe after entry.
- Adequate means of access to and egress from a confined or enclosed space are provided, together with all facilities necessary to rescue and revive any person or persons overcome in such a space.
- Personnel entering a confined space have successfully completed confined space training.

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### 5.17.4 WORKING AT HEIGHTS

Huracan aims to minimise the requirement for its personnel to work at heights. Where possible, these activities shall be eliminated from operations.

Where working at heights cannot be avoided, then this work shall be carried out in accordance with the Safe Working at Height Code.

A Working at Heights Permit is required whenever personnel or objects are at risk of falling into or through one level to another and the work cannot be performed from a permanent platform or other access way.

Where possible all Work at Heights shall be conducted from within edge protection of permanent or temporary work platforms.

Should edge protection not be possible then a combination of a harness, a line and a line anchorage point which shall prevent a person from free falling shall be used.

Working at heights could include but is not limited to;

- Dipping frac tanks
- Working from trailers or backs of trucks
- Climbing wellheads

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 33 of 46

- Accessing objects during rig ups and rig downs
- Making up assemblies on catwalks

### 5.17.5 ELECTRICAL WORK

An **ELECTRICAL WORK PERMIT** is required for work on any electrical circuits or equipment.

This work shall be carried out by a person holding formal electrical qualifications.

**ELECTRICAL WORK** includes, but is not limited to:

- Work on generators,
- Work on electrical panels,
- Work on silicon controlled rectifier units,
- Work on electric motors,
- Work on live electrical circuits which are not in electrical substations, and
- Repair, maintenance, testing and connection.

### 5.18 INSPECTION, TESTING AND MAINTENANCE OF PLANT & EQUIPMENT

Procedures for inspection, testing and maintenance of plant and equipment shall be implemented by the Operations and General Managers!

Procedures shall be typically applied to:

- Land Transport Vehicles.
- Mobile Plant and Equipment.
- Stationary Motorised Equipment.
- Portable Electrical equipment.
- Lifting Equipment.
- Test Equipment.
- Fire Protection equipment.

The Operations & Site Supervisor shall maintain a Register of plant maintenance.

Plant or equipment which is undergoing maintenance, or found to be faulty or in an unsafe condition, shall be taken out of service and tagged appropriately, (i.e. tagged as "Dangerous", "Not for Use" or "Out of Service".

The Operations Manager shall ensure that all plant and equipment is accompanied with Operating Instructions, Maintenance and Inspection records and that only qualified/competent persons operate, maintain and test such plant and equipment.

### 5.19 EXCAVATIONS

Excavations at well and camp sites for effluent processing systems flow and flare lines, mud

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 34 of 46

pits, buried cabling, shall be in accordance with client requirements.

The Site Supervisor shall ensure that client instruction and approval has been obtained before commencing any excavation work.

### 5.20 SAFE WORK PROCEDURES (SWP'S)

Safe Work Procedures shall be prepared for all drilling activities that are considered as standard or routine work.

The Site Supervisor is responsible for ensuring that SWP's are followed and is responsible for initiating development of new SWP's (with assistance from the HSE Manager if present and the work party) as new tasks are introduced to the work sites.

For new tasks for which SWP's do not exist, JSA's in conjunction with risk assessment methods shall be used as the initial basis to develop SWP's.

The draft SWP's developed from this process require the review and approval of Senior

Management before finalisation of the draft SWP's and inclusion into the SWP manuals.

SWP's shall be developed that are specific to each particular rig and the specific equipment in use on that rig.

The process used to develop an SWP is as follows:

- Job specific SWP's developed (via JSA and risk assessment methods) and approved by the Operations Manager.
- Job specific SWP's issued to relevant Operator.
- Job specific SWP's further developed and reviewed by Site Supervisor and work party.
- Changes or improvements made to SWP's.
- Approval and revision by Senior Management and reissue of SWP's.

Revisions of SWP's shall be conducted monthly as a minimum, or as required by changes to operations. SWP's are 'live' documents.

### 5.21 VEHICLE, PLANT AND EQUIPMENT MOVEMENTS AND CONTROL

Operators of vehicles, plant and equipment shall be licensed and competent to operate the vehicle, plant or machinery in question and observe local Road Laws at all times.

All vehicles shall be fitted with a two-way radio. Personnel are not permitted to drive any vehicle unless they have successfully completed an accredited 4WD training course.

Huracan Senior Management shall arrange for personnel to undertake an approved 4WD training course. Records of training shall be uploaded to the Huracan Incident Management Database HIMD.

Vehicles carrying hazardous goods or chemicals shall carry appropriate signage, which is to be clearly visible and mounted correctly to the vehicle.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 35 of 46

All personnel shall utilise journey management procedures as per the Huracan Land Transport Vehicles with loads extending beyond the length of the vehicle shall be flagged. Similarly, loads extending beyond the width of any vehicle shall be clearly indicated by a notice on the front and rear of the vehicle, and such loaded vehicles shall be escorted with a vehicle pilot.

Pilot vehicle drivers shall remain in continuous radio communication with the vehicle's driver as per Road Transport Legislative requirements.

### 5.22 LIFTING AND HOISTING EQUIPMENT

A Critical Lifting Register shall be maintained at all operating Plant indicating all critical lifting equipment on site, equipment serial numbers, load ratings, test dates and relevant certificates. Copies of the Lifting Register shall also be held in the Roma Office.

Lifting equipment shall only be used for the purpose designed and within rated capacity of the equipment. Equipment shall only be operated as per manufactures instructions.

Only qualified operators, who correctly trained in the operation of the relevant equipment, shall be permitted to operate the equipment.

Personnel who are responsible for rigging equipment for use with cranes or certified lifting equipment, shall be licensed Dogmen or Riggers, unless the load is pre-slung, is fitted with a permanent lifting attachment, or using a truck/self-loading crane (HIAB). When a HIAB has a lift rating greater than 10 tonnes the operator shall be suitably qualified.

Concealed loads shall be controlled by the use of an additional dogman, communicating with the Crane Operator by means of an appropriate hand held communication device.

At no time are loads to be lifted over personnel or personnel permitted to work beneath suspended loads.

During hoisting operations where a load requires control during the lift or has the potential to shift, with the potential of damaging equipment or causing injury to personnel, then the load shall be controlled by means of one or more ropes (tag lines).

The requirement for the use of tag lines shall be assessed during the JSA analysis process and development of Job Specific SWP's.

The Site Supervisor is responsible for ensuring that any critical lift risk assessments are performed, any SWP's are used and the relevant approvals obtained prior to such lifts commencing.

Any lift over 10 tonnes to be conducted over a wellhead using a crane requires a critical lifting study and shall be approved by Huracan Senior Management and the relevant Operating Company/Client that operations are being performed for.

### 5.23 MOBILE LIFTING EQUIPMENT

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 36 of 46

Mobile plant shall not be used as a crane device unless it is legally certified to operate as such. The plant shall be inspected and found to meet the statutory requirements for performing the required lift.

The operating types or buckets of mobile plant shall not be left raised with the controls unattended.

No item of mobile plant may operate within 6 metres of high voltage lines unless such lines have been isolated by the proper authority. Work shall then be carried out under the required Permit to Work conditions.

Licensed Mobile equipment shall be maintained in a safe, roadworthy condition and comply with local Road Traffic Authority requirements.

Trainees may operate load shifting or lifting equipment only if they complete a daily logbook, and are under the supervision of a person that holds the certification for the item of Plant the trainee is operating. Logbooks shall be signed off by the certified person at the completion of each operation.

### 5.24 OPERATING MOBILISATION PROCEDURES

Prior to mobilisation to location a pre-job briefing shall be performed with an SME or peer and the relevant procedures and checklists completed and reviewed. A de-brief shall be performed on all jobs with any HSE or SQ incident.

### 5.25 WORKING IN HOT ENVIRONMENTS

Work conducted in Hot Environments shall be in accordance with Huracan Policies and Procedures (refer to Heat Stress Management Policy and Working in Hot Environments).

### 5.26 STEPPING, HANDLING AND LIFTING

All personnel will undertake the Huracan Injury Prevention Program in order to prevent injuries associated with stepping, handling and lifting. In addition to the program Huracan shall provide safe equipment for manual handling tasks. Huracan personnel will also undertake an initial Refer to the Huracan Injury Prevention Management Standard for personnel requirements and details.

### 5.27 MANAGEMENT OF CHANGE

Huracan operations are subject to change, implying that associated risk levels also evolve. It is essential that these changes are managed in a controlled manner so that risk is always maintained at an acceptable level.

The management of change processes shall be followed to manage operational and commercial risk by ensuring that all significant changes to design, equipment, operations, modifications, and deviations from policies are justified, approved, recorded, and monitored in a controlled and effective manner, and that relevant parties are identified and advised of changes as needed,

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 37 of 46

including during personnel handovers.

### Management of Change Procedure

1. The Originator identifies and acknowledges the deviation and the nature of the significant change.
2. The direct line manager of the Originator set up a risk assessment team.
3. The risk assessment team performs a comprehensive risk assessment to determine the initial (before any risk reduction measures are taken) and ultimately residual risk levels.
4. The risk assessment team develops a risk control plan to lower the risk to ALARP (As Low As Reasonably Practicable), including all prevention and mitigation measures specified in the risk assessment.
5. The Originator obtains the approval from the Operations Manager. Requests are initiated before a point of no return is reached, i.e. before any irreversible option is taken that would leave the approver no option but to approve the request;
  - Enough lead time is given so as to allow sufficient time for review and approval;
  - Appropriate technical expertise, if required, is consulted;
  - Requests are approved and the risk prevention and mitigation measures and additional requirements specified in the approval process are implemented before exempted activity is started or before the revised procedure/work instruction is performed;
  - The risk prevention and mitigation measures do not imply another deviation, which should then be addressed with the same methodology.
6. The Approver reviews all the details of the request and in this process must ensure that:
  - The request is justified and that proposed risk prevention and mitigation measures are adequate;
  - Advice is obtained from concerned functions (both internal and external)
  - The approval does not ratify de facto (known) violation of policies, procedures or work instructions, or endorse a fait accompli (existing and acknowledged) situation;
  - The legal department is consulted, as deemed necessary, to ascertain the nature and scope of applicable laws and regulations and to avoid non-compliance therewith in connection with a management of change or exemption request.
7. Upon approval, the Originator must ensure that the management of change details are thoroughly communicated to all those involved, including third parties, and also including any newcomers that may arrive after its initial implementation.
8. The activity is performed.
9. Upon completion of the activity, the Originator must ensure that the management of change is closed out and documented in HIRD.

## 6.0 INJURY MANAGEMENT

In the event that personnel sustain an injury, Huracan Management requires personnel to

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 38 of 46



immediately report the injury to their supervisor.

The Site Supervisor shall notify Huracan Senior Management within one (1) hour after any incident involving an injury that requires medical treatment via direct phone contact and a Huracan HSSE report started with sufficient details to be filled within 24hrs of the incident.

A full incident investigation shall be conducted and a Hazard/Incident/Near Miss Report completed. Huracan Senior Management shall then notify regulatory authorities **(as per the requirements of the Queensland Petroleum and Gas (Production and Safety) Regulations 2004)**.

In the event of a serious injury incident, written signed and dated statements shall be recorded as soon as practical following the incident.

The original copy of any statement shall be uploaded as an attached to the HSSE Report and duplicate copies distributed to the client as soon as practicable.

Those injured (if their condition permits) shall be interviewed regarding specific details leading up to the incident. Each statement shall be accurately recorded and signed as a true and correct record and witnessed.

Unless further danger exists, any serious injury/incident scene shall not be disturbed until the required drawings and/or photographs are recorded and any relevant investigators (Police, Government Inspectors, etc) have attended the scene.

The Site Supervisor shall make arrangements with the Client for the provision of emergency assistance, including ambulance service in the case of serious injury/illness, shall co-ordinate medical treatment in conjunction with RFDS Medical Staff and utilise RFDS services when necessary.

Employees shall be responsible to ensure their employer receives a copy of a doctor's Medical Certificate for any time lost from work due to a work associated injury or illness.

Personnel shall not be permitted to return to work until such time as a clearance is issued by a qualified medical advisor declaring them fit for suitable duties or able to resume normal duties.

### 7.0 FIRST AID

Appropriate First Aid facilities are to be maintained by the Site Supervisor and the HSE Manager.

As a minimum, two persons in each separate worksite shall hold a current senior first Aid certificate/qualification.

Nominated first aiders shall be indicated on the site safety board and made aware to all site personnel via the Site Specific Induction.

Where an assessment of a workplace identifies significant risk, additional trained first aid and/or medical personnel shall be provided as necessary.

First Aiders shall be identified by a Green Cross sticker affixed to their hard hat.

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 39 of 46



The Site Supervisor shall monitor supplies of first aid equipment and ensure all first aid boxes are sufficiently maintained. All Huracan vehicles shall carry an appropriate first aid kit.

The Site Supervisor shall record First Aid Treatments and use the First Aid Kit Check List for recording items required for replenishment first aid kits.

All first aid treatments shall be entered into the incident register by the Site Supervisor and forwarded to Huracan Senior Management as soon as possible to allow update of LTI and MTI statistical data.

### 8.0 EMERGENCY MANAGEMENT

The Huracan Emergency Management Plan (EMP) details responsibilities, procedures, reporting requirements, training and the resources necessary to ensure effective and timely management of emergencies during Huracan operations.

The EMP shall detail procedures for medical evacuations, chemical and oil spills, containment of hydrocarbon release, fire, equipment damage and general emergencies. The ERP shall also be reviewed to ensure that it bridges adequately with Client ERP's.

The EMP details the following information;

- Roles and Responsibilities of supervisory personnel on site and in Head Office in Roma.
- Procedures to deal with emergencies affecting personnel, equipment, the environment, and contractors.
- Describes the external resources available to the Company for use in an emergency and how these resources shall be contacted.

### 9.0 BUSINESS CONTINUITY MANAGEMENT

Each location will develop a Business Continuity Management Plan (BCMP). It is a document that identifies potential significant impacts on Huracan and provides the capability for an effective response that protects its key business processes, assets, reputation and stakeholders' interests.

The objective of this plan is to enable Huracan to continue to manage its business under adverse conditions by the introduction of appropriate strategies including business continuity planning and emergency and crisis management planning as key components of the Huracan risk management process.

Key components to achieving the above objectives are;

- Establish a Business Continuity Management Team (BCMT) that will be in charge of developing the Business Continuity Management Plan;
- Identifying the key business processes;
- Analysing the impact of the business disruption to the location;
- Assessing and controlling the risk threatening the key business processes;

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 40 of 46

Ensure the continuous administration of this BCP through distribution, training, drill and maintenance.

## 10.0 CONTRACTOR MANAGEMENT

Huracan Management shall perform appropriate pre-qualification assessments long term (greater than 3 months) Contractors to ensure that Contractors work policies, systems and safety management plans align with those of Huracan.

Only contractors assessed as having adequate plans and systems shall be engaged in Huracan operations.

Where a Contractor is regarded as a 'Major' Contractor then the following is required:

- Safety management plan and policies.
- Historical LTI and MTI performance indicators.
- Internal and external audits of management systems.
- Operating and maintenance records for relevant plant.
- Training and qualification records of relevant personnel.
- Third Party Contractor SMP to ensure integration with Huracan plans.

Where a Contractor is regarded as a 'Minor' Contractor then the Contractor shall be obligated to comply shall all aspect of Huracan's HSE procedures and systems as outlined in this document.

A register of preferred Contractors is maintained by Huracan.

Contractors who subsequently fail to meet the relevant commitments of Huracan's Health, Safety and Environmental performance requirements shall be removed from the preferred list of Contractors.

## 11.0 STATUTORY ACTS & REGULATIONS

The Huracan SMP encompasses compliance requirements to but not exclusively the following legislation and Australian Standards. Click on relevant title for the document link. Please check for [repealed legislation](#) prior to review of the relevant document.

In particular:

- [Petroleum & Gas Act 2004](#)
- [Petroleum & Gas \(Production and Safety\) Regulations 2004](#)
- [Work Health & Safety Act 2011](#)
- [Work Health & Safety Regulation 2011](#)
- [Workers' Compensation and Rehabilitation Act 2003](#)
- [Workers' Compensation and Rehabilitation Regulation 2003](#)
- [Australian Standards.](#)
- [Work Health & Safety \(Codes of Practice\) Notice 2011](#)

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 41 of 46

These Acts & Regulations impose a **“Duty of Care”** on all employers and employees.

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Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page <b>42</b> of <b>46</b>

## APPENDIX A – HURACAN RISK MATRIX

Control Measures		MITIGATION	Very Low	Low	Medium	High	Very High
PREVENTION			LIKELIHOOD				
Multi-Catastrophic	5	SEVERITY	5 MC	20 MC	15 MC	20 MC	25 MC
Catastrophic	4		4 C	8 C	12 C	16 C	20 C
Major	3		3 M	6 M	9 M	12 M	15 M
Serious	2		2 S	4 S	6 S	8 S	10 S
Light	1		1 L	2 L	3 L	4 L	5 L

Likelihood	Description
Very Low	Incidents not known to have occurred
Low	Incidents occurring less than once per year in the industry
Medium	Incidents occurring once or more per year in the industry
High	Incidents occurring once or more per month in the industry
Very High	Incidents occurring once or more per week in the industry

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 43 of 46

## APPENDIX B – RESIDUAL RISK APPROVAL

	Segment Generic	Function Generic	Local Specific
Documenting JSA	Segment Ops Support QHSE Staff, Subject Matter Experts	Function Staff Subject Matter Experts	Location task/process owner Local Subject matter expert Local team leader
Validating JSA	Segment Ops Support Manager	Function Manager	Location Manager
Approving a JSA with Insignificant and Low Residual Risk	No further approval required.		
Approving a JSA with Medium Residual Risk	As for Validating JSA		Operations Manager
Approving a JSA with High Residual Risk	Company Director		
Approving a JSA with Extreme Residual Risk	Approval not permitted		

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 44 of 46

## APPENDIX C – HSSE CLASSIFICATION

LOSS CATEGORY		SEVERITY	-1 LIGHT (L) Client + Huracan \$ Loss <10K Days (LWDC or RWDC) < 1	-2 SERIOUS (S) Client + Huracan \$ Loss >10K - < 100K Days (LWDC or RWDC) > 1 - <100	-3 MAJOR (M) Client + Huracan \$ Loss > 100K - < 1000K Days (LWDC or RWDC) > 100	-4 CATASTROPHIC (C) -5 MULTI-CATAST. (XC) Client + Huracan \$ Loss > 1000k Loss of Life (fatality)
HEALTH	Illnesses		- Medical Case or First aid	- Temporary disability - Any illness involving 1 day or less hospitalization of any party - Radiation exposure above Huracan dose limits ref Std. 18	- Permanent disability - Any illness involving more than 1 day intensive care by any party	
	Injuries		- Medical Case or First aid, return to normal duties by next day	- Temporary disability - Any accident involving 1 day or less hospitalization of any party	- Permanent disability - Any accident involving more than 1 day intensive care by any party	
SAFETY	Personal Security		-Any physical aggression not involving a firearm, resulting in loss of personal effects (<10K) or light injury	- Abduction/kidnap express with loss of personal effects (>10K - <100K) - Any physical aggression not involving a firearm, resulting in loss of personal effects (>10K - <100K) or serious injury - Traveling to Medium or High Risk Regions/Cities/Locations without authorization. - Extortion, intimidation (via phone, email, post, etc.). - Any physical aggression, resulting in loss of Huracan or Contractor vehicle (>10K - <100K)	- Kidnapping with death threat and ransom >100K to < 1M - Any physical aggression involving a firearm, regardless of loss of personal effects - Any physical aggression resulting in more than one day of intensive care or medivac - Any physical aggression taking place in the home or residence - Life threatening calls/threats. - Any physical aggression, resulting in loss of Huracan or Contractor vehicle (>100K - <1M)	- Death of one person due to armed aggression. - Kidnapping with death threat and ransom >1M to < 5M (not including Military or Police personnel assigned to protecting Huracan personnel or assets). Multi Catastrophic - Death of more than one person due to armed aggression. - Multiple kidnappings with death threats and ransoms > 5M (not including Military or Police personnel assigned to protecting Huracan).
	Automotive (Light, Heavy)		- Low speed (<12mph/20 kph) rollovers involving off-road vehicles such as buggy or tracked vehicles - Any minor accident not falling into another category	- Low speed (<12mph/20 kph) rollovers involving heavy vehicles or light vehicles - Any Huracan or third party vehicle that cannot be driven from the scene - Any accident that causes any Huracan or third party vehicle to leave the roadway at a speed > 12 mph/20kph - Intersection or rear-end collision with our vehicle moving at more than 12mph/20kph	- Any rollover involving any vehicle occurring greater than 12mph/20kph	
	Property (Vehicle, Other)		- Damage to any Huracan vehicle legally parked and unoccupied		- Any loss or theft of radioactive sources or explosives or dual use or precursor chemical, other than in a well, even if temporary	
	Information Security (See IT Security standard)		- Unauthorized software in use on an Huracan computer. Inappropriate use of SINet computing assets - Access of employees / contractors no longer employed - Failure to comply with TOP-12	- Unauthorized use of information labeled as Huracan-Private - Third party access to SINet through an unsecured computer or network - Disclosure of computer access passwords, PINs, etc. - Loss of computing / communication equipment with Huracan-Private data or encrypted Huracan Confidential or Secret Data	- Unauthorized use of information labeled as Huracan-Confidential - Virus infection spread across multiple sites - Significant outage of critical computing or network assets - Loss of computing / communication equipment with un-encrypted Huracan-Confidential data	- Unauthorized use of information labeled as Huracan-Secret - Uncontrolled access to Huracan networks from the Internet or other network - SINet-wide virus causing significant business disruption - Loss of computing / communication equipment with un-encrypted Huracan-Secret data

Document Owner	Document Approver	Document Number	Control	Rev Date	Next Review	Page
K. Hollingworth	J. Hollingworth	HSMP Rev2.3	Public	5-Jul-2019	4-Jul-2021	Page 45 of 46