



JAK ENERGY SOLUTIONS LIMITED
(RC1208698)

HEALTH, SAFETY AND ENVIRONMENT
MANAGEMENT PLAN

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1. Introduction

This HSE Plan defines the parameters within which efficient and effective Health, Safety and Environmental performance will be optimised. This plan clearly outlines the mandate, policy framework, outputs and activities for Health, Safety and Environment, in order to shift the focus from the realisation of minimum requirements, to the achievement and sustainability of world-class standards. As a “living document”, the HSE Plan gets revised to reflect any improvement changes, both internal and external. By external changes, we mean changes in client’s minimum HSE requirements, new legislation and all other pertinent issues.

2. Purpose and Scope

The purpose of the JAK Energy Solutions Limited Health Safety and Environmental (HSE) Plan is to identify the overall objective for the successful management of HSE issues that pertain to the conduct of our business. By clearly describing the methods and the tools the company will use to ensure optimum HSE performance, we hope to more clearly define the company strategy for continuous improvement in this critical area of our business. All JAK Energy Solutions Limited employees should understand how the company plans to achieve the goals set forth in this document and how the existing programs will be used to reach that end. We ask that our employees join in this effort to ensure a solid progressive future, for themselves, and for the company. A future based on world class HSE performance that we all can participate in and be proud of..

3. Objectives

- i. To ensure that each level of employee, participates with this plan to effectively achieve a Safe, Healthy and environmentally friendly company.
- ii. To ensure that the application of this plan is integrated into each job, task, method, procedure and business decision.
- iii. To assure and demonstrate conformance with stated SHE Policy and to legislative requirements.
- iv. To assure and demonstrate conformance with stated SHE Policy and to legislative requirements.

4. Management Commitment

The JAK Energy Solutions Limited Board, Executive and senior management are committed to the provision of a safe and healthy work environment.

The JAK Energy Solutions Limited recognises that, so far as is practicable, the provision of a safe and healthy workplace is the responsibility of PPA management.

While ultimate accountability for achieving these objectives lies with the Chief Executive Officer (CEO), for practical purposes the responsibility for implementation of the The JAK Energy Solutions Limited HSE Policy is delegated to appropriate areas and levels of the business in accordance with The JAK Energy Solutions Limited Authorisations Policy. The JAK Energy Solutions Limited is committed to allocating resources to ensure that its health and safety obligations are met

5. Health, Safety and Environment (HSE) Policy Statement

Here at JAK, we highlight the importance of sustaining a compelling work environment. We have a well developed HSE policy that endures to protect all our employees and stakeholders affected by our operations. To achieve this, the organisation undertakes all reasonable and practicable steps to prevent and eliminate any risk of incident.

We are committed to:

- Developing, implementing and maintaining a system for the effective management of safety, health, environment and quality that drives continuous improvement.
- Ensuring continual improvement in the management of safety, health, environment and quality performance by setting and reviewing clear objectives, plans and measurable targets.
- Providing health care coverage for our employees.
- Complying with all relevant legislation and standards and, where appropriate, applying industrial best practice standards.
- Protecting, promoting and maintaining the health and safety of all stakeholders in its areas of operation.
- Providing necessary resources, training, standards, equipment and support to ensure compliance with this policy.



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Director
JAK Energy Solutions Limited
September 2020

6. Organisation and Responsibility

The structure of JAK Energy Solutions Limited is represented in the JAK Energy Solutions Limited Organisation Chart. HSE responsibilities and authorities of relevant functions are documented in individual Job Description Forms (JDF's).

The successful implementation of this HSE Management Plan requires a commitment from all personnel who shall be aware of their roles and responsibilities in relation to HSE, as well as the risks and potential significant impacts related to their jobs.

The JAK Energy Solutions Limited HSE Manager is directly responsible for the health and safety of all personnel involved in or exposed to hazards associated with LPG operations.

All personnel have a responsibility for their own health and safety and for the health and safety of those around them. In addition to this, the CEO has delegated specific duties and responsibilities to a number of personnel to assist in ensuring the health and safety of all.

JAK Energy Solutions Limited Staff Health, Safety and Environment (HSE) Committee's convene on a regular basis to assist in furthering the safety objectives of JAK Energy Solutions Limited.

JAK Energy Solutions Limited engages regularly with various users to ensure HSE objectives are achieved.

Key Responsibilities

The JAK Energy Solutions Limited Health and Safety Manager, as the process owner of this HSEMP (Health, Safety and Environment Management Plan), must ensure compliance of the HSEMS (Health, Safety and Environment Management System), with the HASAWA (Health and Safety at Work Act) 1974 by:

- Ensuring that the OSHMS requirements are clearly established, implemented and maintained in accordance with HASAWA 1974 and
- Reporting on the performance of the HSEMS to the Executive and Board, to allow for transparent review and the identification of potential improvements to the HSEMS (Health, Safety and Environment Management System).

Management must provide and maintain a workplace where personnel are not exposed to hazards by:

- Promoting and requiring commitment and compliance with the JAK Energy Solutions Limited HSE Policy and this HSEMP from all personnel;
- Providing and maintaining safe work places, plant and systems of work;
- Providing information, training and supervision to personnel to enable them to perform their work in a safe manner;
- Communicating with all personnel on HSE matters in the workplace;
- Providing personnel with personal protective equipment (PPE) free of charge to protect them against hazards that cannot be eliminated;
- Providing for the safe maintenance, use and disposal of all plant;
- Providing for the safe storage, use and disposal of hazardous substances;
- Complying with the requirements of all statutory safety legislation where applicable; and
- Understanding and enforcing the HSEMP, ensuring safety risks are identified and reduced to as low as reasonably practicable (ALARP).

Personnel at all levels shall assist in the prevention of incidents by:

Complying with the JAK Energy Solutions Limited HSE Policy and this HSEMP;

- Being responsible for their own health and safety and that of others in the workplace;
- Keeping the workplace in a clean and tidy condition;
- Not interfering with or misusing either personal or mechanical protective equipment that has been provided or installed for the purposes of health and safety;
- Using personal or mechanical protective equipment issued or supplied as instructed, and seeking advice as needed;
- Identifying, controlling and reporting all hazards in the workplace;
- Reporting all incidents to the appropriate supervisor immediately;
- Working in accordance with those relevant PPA procedures and requirements which have been provided, to ensure the health and safety of all employees and others;
- Complying with the requirements of all statutory safety legislation where applicable; and
- Having an understanding of the HSEMP as it applies to their work activities, whereby no item of health and safety is ignored or deferred.

Contractors

Contractors have day-to-day responsibility over their working area as defined by their scope of works. Each Contractor must:

- Establish and maintain an OSH Policy and safe system of work;
- Provide appropriate training and supervision to their personnel;
- Purchase and maintain safe plant and equipment, and
- Provide a safe workplace.

This HSEMP outlines responsibilities of JAK Energy Solutions Limited management and personnel, with the expectation that contractors meet the same standard as a minimum.

Contractors will be informed during contract negotiations of the requirement to submit their HSEMP and associated documentation for review prior to commencing work. JAK Energy Solutions Limited will assess the supplied documentation for compliance with the requirements of this HSEMP.

Contract Management Guidelines provides JAK Energy Solutions Limited personnel with an overview of the requirements for contract development and management.

Refer to JAK Energy Solutions Limited Procurement Procedure for further information about the requirement for potential suppliers to demonstrate compliance to relevant provisions of HASAWA 1974, and particularly that they are systematically controlling risks to the HSE of their own business, and to JAK Energy Solutions Limited.

7. Document Control

Management employs a Document Control Procedure to manage all controlled documents, including but not limited to policies, procedures, standard work instructions, forms, manuals, plans and reports related to activities carried out.

JAK Energy Solutions Limited documents are assigned a Process Owner within JAK Energy Solutions Limited who is responsible for the adequacy and currency of the content, and ensuring periodic review. They are accountable for notifying external parties affected by changes to documents within their responsibilities.

Refer to Document Control Procedure for further information on the processes for managing controlled JAK Energy Solutions Limited documentation.

8. Hazard Identification and Risk Management

The key hazards and risks associated with the operation of LPG operations; storage and distribution have been identified and assessed in the development of this HSE Management Plan and may be grouped into a number of categories. These are listed below together with a statement on how the risks are being managed.

Fire and Explosion

This may be caused by the ignition of uncontrolled risk.

- All gas storage and cylinders are stored away from ignition sources.
- Ignition sources are strictly controlled in proximity to LPG (Liquified Petroleum Gas) storage areas
- All cylinder storage areas have been laid out to ensure that they do not in any way impede or jeopardise the escape of people in the case emergency.
- All storage containers are fitted with valves that will actuate automatically to reduce internal pressure caused by fire.(PRVs).
- Staff have been trained on the emergency management procedures.
- Combustible material and rubbish are removed from gas storage areas regularly.

Exposure

LPG has the potential to displace oxygen, creating a breathing hazard. The risk of injury to rescuers should be considered before any attempt is made to remove persons from areas with high concentrations of gas or confined spaces. LPG contains an odourant designed to alert users to its presence in the atmosphere.

- Staff are trained in Emergency Management procedures
- LPG is not sold to young persons or any persons where “sniffing” may be suspected

Impact with Petroleum products such LPG etc. storage vessels

Leaks, fire or explosion can result from vehicle damage to petroleum products such as gas storage vessels.

- LPG is only stored in approved locations in accordance with DPR regulations.
- Bulk vessels are installed with approved collision protection guidelines
- Cylinders are stored in a protected area on flat, even ground or on an elevated platform to prevent collision.

Vehicle Accident

- Petroleum products such LPG, Naphtha, gasoil transport vehicles involved in accidents can create a threat of leak, resulting in fire or explosion.
- Petroleum products such LPG, Naphtha, gasoil tankers are inspected and maintained to minimise the likelihood of leaks.
- Cylinder delivery vehicles adequately restrain cylinders during transport in accordance with the National Transport Commission, Load Restraint Guide.
- All vehicles are placarded where required and comply with Dangerous goods transport legislation and codes.
- All delivery drivers are trained and assessed as competent.
- Visitors to site who wish to transport cylinders are instructed in appropriate measures.
- Staff will not load LP Gas into inappropriate vehicles as set out in the Distributor Manual

Gas Leak

LP Gas is heavier than air and will “gravitate” to the lowest point. Leaks can occur at storage vessels, fittings, valves, pipelines and appliances. Should a gas leak find an ignition source it can “flash back” to the leak point

- All cylinder storage areas have been laid out to ensure that they do not in any way impede or jeopardise the escape of people in the case of emergency.
- Storage, handling and transport procedures incorporate activities (leak tests, site inspections) designed to identify gas leaks.
- Decanting equipment contains fail safe devices designed to minimise sudden increased changes in flow rates (excess flow valves)
- All storage containers are fitted with pressure relief valves (PRV’s). These valves are at all times engaged with the vapour space.
- Ventilation around gas storage areas has been assessed by the supplier in accordance with DPR regulations.

Hazard Identification Tools and Methods

JAK Energy Solutions Limited provides a range of tools to assist in the identification, assessment and control of hazards and risks pertaining to activities of the organization.

Risk assessment framework is in place to provide for the efficient assessment of risks, and allow for the implementation of controls commensurate with the level of risk identified. JAK Energy Solutions Limited provides a range of tools to assist in the identification of Hazards prior to commencing a task, including 5 by 5 matrix Risk Assessment, Job Hazard Analysis (JHA) Risk Assessment, and other Safe System of Work (SSOW).

The below Risk Matrix is the JAK Energy Solutions Limited standard risk assessment tool

0 – 5 = Low Risk		Severity of the potential injury/damage				
		Insignificant damage to Property, Equipment or Minor Injury	Non-Reportable Injury, minor loss of Process or slight damage to Property	Reportable Injury moderate loss of Process or limited damage to Property	Major Injury, Single Fatality critical loss of Process/damage to Property	Multiple Fatalities Catastrophic Loss of Business
6 – 10 = Moderate Risk		1	2	3	4	5
11 – 15 = High Risk						
16 – 25 = extremely high unacceptable risk						
Likelihood of the hazard happening	Almost Certain 5	5	10	15	20	25
	Will probably occur 4	4	8	12	16	20
	Possible occur 3	3	6	9	12	15
	Remote possibility 2	2	4	6	8	10
	Extremely Unlikely 1	1	2	3	4	5

Hazards and risks identified through other means such as:

- Throughout the course of a work activity;
- During workplace inspections;
- During pre-start inspections of equipment;
- Through Incident Analyses;
- During auditing activities; and
- Through a range of other methods.

Identified hazards or risks are reported, assessed, communicated and controlled in accordance with JAK Energy Solutions Limited procedures.

9. Incident Management

Management must ensure immediate response to and timely reporting, analysis and communication of all incidents which occur in areas under the control of JAK Energy Solutions Limited. All personnel have a responsibility to report all incidents regardless of severity, to their supervisor as soon as practicable.

All incidents shall be recorded in the approved incident reporting system, and be analysed to a level commensurate with the actual consequence or potential risk rating, whichever is higher.

Corrective Actions must be determined with consideration for the Hierarchy of Controls.

Refer to with JAK Energy Solutions Limited Incident Management Procedure for further information.

10. HSE Communication and Consultation

In order for staff to be fully abreast on HSE matters, management has the following mediums with which HSE issues are fully communicated to the entire workforce;

- HSE Induction
- Scheduled meetings
- Daily toolbox talk meetings
- HSE signs/notices
- Safety Bulletins & Newsletters
- Training and Workshop

It is a legal requirement for the JAK Energy Solutions Limited to establish arrangements to communicate and consult with employees on issues affecting their health and safety and to take account of their views. consult with employees when changes to processes, equipment, work methods etc. are to be introduced that may affect their health and safety

11. Training and Competence

JAK Energy Solutions Limited is committed to providing employees with the necessary training to perform their work safely and effectively.

JAK Energy Solutions Limited requires that training arrangements for all personnel take into account the best approach to learning for the intended audience, such as reading and writing ability, learning style, the suitability of the learning environment, and considerations for differing abilities, backgrounds, cultures, religious beliefs and ethnicity.

Specific training systems are used for basic and refresher training to meet all company and regulatory requirements. A training matrix was developed and describes all necessary training for individual employees. Training is documented through attendance records, test scores, and training completion recognition.

12. Induction of Staff

All JAK Energy Solutions Limited employees and subcontractor employee must undergo an induction program. The induction will serve as a preamble to this Plan as well as reinforcing JAK Energy Solutions Limited common objective of providing a safe place of work for the employees, sub-contractors, local communities, visitors and everyone affected by the operation. The induction will cover the following:

- JAK Energy Solutions Limited HSE Policy
- Accident preventive measures
- Awareness on safe systems of work (PTW, JSA, Risk assessment etc.)
- Journey Management (Road Safety / Land and Marine Transport)
- Emergency / Medevac Procedure
- Daily Tool Box Talk Meetings
- Safety Meetings
- Unsafe Act/Conditions reporting
- Behaviour Based Safety (BBS)

13. Medical Fitness

To maintain a healthy and productive work force, every prospective employee must undergo a pre-employment medical check to ascertain state of health and medical fitness prior to employment. Periodic medical checks will also be carried out on old employees. In both categories a certified employee shall be issued with a certificate of fitness which must be stamped and signed by a certified Doctor.

14. Health Surveillance

Health surveillance is the early detection of adverse health risks associated with a work activity. It allows staff at increased risk to be identified and additional precautions to be taken as necessary. It is also a means of checking the effectiveness of the existing control measures.

To ensure adequate health surveillance is implemented the Company will:

- carry out risk assessments to identify those activities, processes or materials that are likely to give rise to a health risk
- ensure that adequate control measures are put in place to reduce risks as far as possible
- seek advice on risk reduction from our safety advisor, occupational hygienist or other relevant person as necessary
- seek the advice of relevant people on the need for health surveillance where it is thought that a residual health risk remains following the implementation of control measures
- advise employees of the health risks and the signs of ill health
- ensure employees co-operate with health surveillance procedures provided
- discuss with the relevant people any health concern brought to their attention by an employee

15. Emergency Response Preparedness

Company have established Emergency Response Plan (ERP) procedure in place.

Potential Emergency situation include the following:

- Fire out-break
- Medical
- Civil Unrest.

Emergencies can be quite varied and only some of them are dealt with below; others may include natural disasters, earthquake, bomb threats etc

Gas Leak

In the event of a gas leak or a fire, a brief summary of emergency procedures to be initiated is as follows:

Minor

- Safely close all valves of storage containers and bulk vessels.
- No smoking. No naked lights.
- No engine to be started.
- Keep bystanders away and upwind of gas leak.

Major

- Safely close all valves of storage containers and bulk vessels.
- No smoking. No naked lights.
- No engine to be started.
- Keep bystanders away and upwind of gas leak.
- Phone Fire Service immediately.
- Where appropriate, contact SUPPLIER on emergency response numbers detailed in Section 1.3.
- Isolate power at main switchboard, subject to Site Manager's approval.

Fire & Explosion

Staff should only attempt to fight small fires that can be safely put out by extinguishers or fire hoses. All other fire fighting should be left to the Fire Service.

Where releasing gas has ignited, no attempt should be made to extinguish the flame unless an isolation valve can be readily turned off thus stopping the gas flow.

Cylinders or tanks impacted by fire may often be accompanied by loud noise or whistling. This is the vapour rushing through the Safety (Pressure) Relief Valves as it relieves the excessive internal pressure

Jet flames impinging on other cylinders or tanks can cause a catastrophic failure resulting in a boiling liquid expanding vapour explosion (BLEVE)

Should this occur, initiate an immediate full evacuation of all personnel, actuate all Emergency Stop devices and call the Fire Service

- Phone Fire Service .
- Contact your immediate Supervisor/Manager.
- If safe to do so, close all storage vessel valves
- Keep bystanders away
- Isolate power at main switch box, if trained and safe to do so
- Follow fire fighting instructions where safe to do so

Drills

Drills are conducted on a regular basis and are considered an essential part of the overall safety program to ensure that everyone fully understands their role in case of an emergency.

16. First Aid

The company maintains First Aid trained representatives. Their responsibility is to carry out any first aid procedure. (refer to ERP Procedure). For severe cases, while the First Aid treatment is administered the medical facility is notified and injure personnel medevac.

17. Drug and Alcohol

Use of alcohol and drugs is prohibited at JAK Energy Solutions Limited Ltd. It is the responsibility of all employees to ensure an alcohol and drug free environment. If there is any awareness or suspicion that any employee, supplier or visitor is under the influence of illegal narcotics or alcohol, will be removed from the premises immediately

18. Smoking

Smoking is permitted only in designated smoking areas.

19. Inspections and Audits

Inspections and audits are carried out to ensure compliance with minimum safety standards in accordance with good practice and regulations. Both internal and external audits is carried out at JAK Energy Solutions Limited

JAK Energy Solutions Limited has established, implemented and maintains an audit program and procedure for periodic HSEMS audits. Audits are carried out by a competent person, in order to determine whether the HSEMS:

- conforms to the HSE standard the company subscribes to; and
- is in line with the JAK Energy Solutions Limited HSE Policy; and
- meets the objectives and targets for continual HSE improvement.

The results of audits are communicated to management and employees.

Internal Audit

Internal HSE audits are conducted in accordance with the HSE Internal Audit Schedule, which is developed annually. Audit evidence is documented, and findings recorded in the HSE Audit Report Form.

External Audit

External audits are conducted by contracted external companies to objectively review the HSE systems and it's affectivity of implementation. This is mandated based on the pre-defined requirements from the respective certification bodies. Audit criteria are predefined by the auditor/ auditing company and are discussed and agreed upon by with the HSE departments

20. HSE Performance Monitoring

HSE KPI Key Performance Indicators Table

S/N	Leading Indicators	Plan	Actual	Lagging Indicators	Plan	Actual
1	Adequate controls for key hazards	100%		Manhours	0	
2	HSE Trainings	100%		Fatalities	0	
3	Management Field inspections	100%		LTI	0	
4	HSE Audits/Inspections	100%		Total Recordable Cases	0	
5	Emergency Drills	100%		High Risk Incident	0	
6	Compliance to work procedures	100%		Unsafe Acts/Unsafe Condition	0	
7	HSE Meetings	100%		Kilometres Driven	0	
8	Stop Work Authority Exercised	100%		Motor Vehicle Incidents	0	
9	Safety Observations	100%		Waste Disposal	100%	

21. Personal Protective Equipment (PPE)

Personal protective equipments (PPE) will be issued to personnel depending on the type of hazard exposure. A critical assessment of hazard suggests the appropriate PPE to be used.

22. Hazardous Waste

JAK Energy Solutions Limited Management ensures the safe control of hazardous substances and reduce the level of exposure to personnel, property and the environment in accordance with Department of Petroleum Resources (DPR) regulations.

A risk assessment shall be undertaken to assess the health risks to personnel. Health Surveillance may be required to monitor the health of personnel who are at significant risk of exposure to hazardous substances.

Refer to Hazardous Substances and Dangerous Goods Procedure for the requirements for managing the risks associated with hazardous substances and dangerous goods.

23. Legal and Other Requirements

JAK Energy Solutions Limited maintain a written procedure for identifying and accessing the legal and other HSE requirements that are applicable to the HSEMP. This procedure will outline the requirements that shall be taken into account with respect to the HSEMS, the controls necessary to ensure these specifications remain up to date as well as measures to ensure the required information is communicated to all employees, contractors and subcontractors.

The HASAWA Act and DPR regulations clearly establish the principals of control and duty of care as key foundations for safety responsibility. This HSEMP has been developed to meet these legislative requirements..

24. Journey Management Plan

Where identified as a control measure via a risk assessment process, a journey management plan shall be developed (not mandatory for all journeys). The risk associated with and expected duration of a journey should be considerations when determining the need for a journey management plan. For journeys to / through remote and isolated locations, Business Procedure: Remote and Isolated Work Safety shall be complied with and the development of a journey management plan shall be considered.

JAK Energy Solutions Limited Journey management plans shall consider as a minimum:

- main route and alternate routes of travel;
- types and coverage of communication devices;
- communication methods and frequency of contact for updates and check-in calls;
- travel time, breaks and higher risk periods (dusk, dawn, night);
- emergency notification and response plans;
- plans weather conditions including rain, fog, high winds;
- driver fitness such as previous work periods and fatigue; and
- the remoteness of the destination.

Motor vehicle travel shall be reviewed and planned to make sure that:

- the risks of the journey are adequately controlled and managed; and
- crisis and emergency management procedures can be implemented where required.

Fatigue and Long Distance Driving

The following controls shall be implemented so far as is reasonably practicable

- journeys and long distance travel shall be planned for daylight hours. Driving at night should be kept to a minimum and should be done only when daylight travel is not possible. Consideration shall be given to the adjustment of emergency or crisis preparedness for night time driving through the risk assessment process;
- personnel shall avoid driving more than 12 hours in a 24 hour day;
- personnel have had adequate sleep the night before a long journey (refer to the Fatigue Management Business Procedure and Journey Management Plan Tool for guidelines);
- share driving where possible; and
- personnel take a rest break from driving of at least ten minutes every two hours or more frequently if deemed required.

Distracted Driving

This section relates specifically to the use of distracting devices while driving on business / operating vehicles for the organisation.

The following shall not be performed whilst operating a vehicle:

- Using, in any way (includes reading etc.), a mobile phone or other portable electronic device (it is also preferred that talking on a 'hands free' device is performed whilst safely pulled over / stationary); and
- Programming or adjusting a navigation system

Vehicle Inspections and Maintenance

Motor vehicles shall be inspected and maintained in accordance with the relevant manufacturer's recommendations. A visual inspection of general vehicle condition including tyres, wheel nuts, body damage and seat belts shall be undertaken at the start of a journey.

Licence and Competence Requirements

Employees and contractors operating all vehicles shall hold a valid driver's licence for the class of vehicle they are required to drive.

Personnel shall immediately notify their relevant manager following any change to their licence state

25. Management of Change (MOC)

Management of Change shall be implemented for all physical, process, procedural, and personnel and organizational changes within existing operational assets in accordance with the requirements of this procedure.

Responsibilities

Line Management shall;

- Ensure staff is adequately trained on the MOC process.
- Ensure that appropriate resources and personnel are assigned for implementing and maintaining the functionality of the MOC process.
- Ensure work is completed according to the approved MOC including attached documentation and reviewers conditions of approval.
- Review KPIs to monitor the effectiveness of the MOC program. Institute corrective action plans for continuous program improvement.

Initiator shall;

- Utilize the Management of Change program, complete the appropriate sections and supply adequate documentation for change in accordance with this procedure.

MOC Coordinator shall;

- Coordinate and monitor the Management of Change program throughout the MOC process as described within this procedure

MOC Supervisor shall;

- Implement and maintain the program,
- Define roles and responsibilities.
- Provide appropriate training as requested by line management,
- Maintain functionality of the MOC Database,
- Develop, collect and report KPIs for the MOC process, and
- Perform process compliance audits to identify deficiencies and opportunities for improvement.

26. Management Review

Executive management shall review the JAK Energy Solutions Limited HSEMS to ensure the continued suitability, adequacy, and effectiveness of the JAK Energy Solutions Limited HSEMS. These reviews will occur annually.

27. Continual Improvement

Management regularly reviews and continually improves the JAK Energy Solutions Limited HSEMP with the objective of improving HSE performance.