HEALTH SAFETY & ENVIRONMENTAL MANUAL

La Rochelle, March 2015
OBJECTIVE:
This document describes the CREOCEAN HSE (Health Safety and Environmental) policy and the management system implemented to control its environmental impacts and ensure employee safety during all business activities.

It aims to give all employees a view of our HSE organization to make sure that it is applied in the best possible way.

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Review | Modification(s) made
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00 | Initial drafting
01 | Update with new logo and organisation
02 | Organization chart update
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1 A WORD FROM THE PRESIDENT

Viewed from the outside, the company's business seems to be leisurely spent at sea, on the beach, diving among coral reefs, on board cruise ships, etc. Obviously, this is not actually the case! And this rather naive view should not mask the daily reality of the work performed by the men and women in our teams.

Health and safety in the workplace, controlling environmental hazards and good conditions in all our workplaces are top of my list of concerns. Alongside all the team leaders, I am committing to including this data in how we run our operations to:

- Protect health and safety for our workers, visitors, subcontractors and customers;
- Inform staff about their right to withdraw in the event of serious and imminent danger;
- Train staff in our professions’ different requirements plus legislative and regulatory requirements;
- Assess the risk derived from our operations and business activities and develop appropriate action plans;
- Consider the environment and manage our business activities to reduce our environmental footprint.

Defining our environmental policy and the management system is therefore an essential point in our common search to improve work procedures to reach the target of ZERO:

- Accidents;
- Professional illnesses;
- Negative environmental footprint.

Jean-Marc SORNIN
CEO
2 SCOPE AND FIELD OF APPLICATION

2.1 Aim

This document describes the CREOCEAN HSE (Health Safety & Environmental) policy and the management system implemented to control our environmental impacts and ensure employee safety during all business activities.

It aims to give all employees an insight into our HSE organisation to make sure that it is applied in the best possible way.

2.2 Scope

The EHS manual's prerequisites are not only applied to all our business activities but also to subcontractors when working onsite with CREOCEAN teams.

The scope includes all agencies and subsidiaries on the date of drafting this version of the manual:

- Mainland France
  - La Rochelle (headquarters)
  - Montpellier
  - La Seyne-sur-Mer
  - Nantes
  - Caen

- Overseas and International
  - Martinique & Guadeloupe
  - Morocco (Casablanca)
  - Middle East (Doha and Abu Dhabi)
  - Polynesia (Tahiti)
  - New Caledonia (Nouméa)
  - Indonesia (Jakarta)

The scope also includes temporary or permanent worksites that have opened since this document was drafted and before its subsequent update.

2.3 Field of application

The field of application groups together all CREOCEAN business activities, broken down as follows:

1. CAD - Common services, admin, design dept.: these are mainly office jobs, only exceptionally requiring business trips for meetings, sales endeavours, training, etc. but no involvement in on-site operations.

2. HYD - Hydrodynamic and hydro-sedimentary: these are mainly office-based jobs (calculation, modelling, digital, drafting reports, etc.) that might also involve on-site assignments (observations, implementing measuring equipment, etc.), field appraisals, customer meetings, etc.

3. OUV - Technical structure feasibility: these jobs are divided up almost equally between office work (calculations, drafting reports, etc.) and on-site appraisals (inspecting structures, worksite meetings, etc.).
4. GEO – Geosciences: these jobs are divided up almost equally between office work (using data, drafting reports, etc.) and on-site or on-board appraisals (measurements at sea, use of acoustic or seismic measurement tools, etc.)

5. ENV - Environment: these jobs are divided up almost equally between office work (using data, drafting reports, etc.) and on-site or on-board appraisals (measurements at sea, sampling, etc.) or by underwater diving.

6. TECH - Senior technicians: these are mainly jobs working on-site, on-board or underwater diving that might also involve some office tasks (preparing assignments, processing data, etc.) in the lab or in meetings.

There is no exclusion relating to chapters of the ISO 14001 and OHSAS 18001 standards.

The manual is completed by procedures and instructions (PEP, DUP, etc.) providing operational arrangements.

3 HSE POLICY AND AIMS

CREOCEAN's policy relies on the 10 principles in its charter: SSE_HSE charter.

A management programme, SSE_HSE management programme, sets annual targets based on:

- the 10 principles of CREOCEAN's HSE policy;
- feedback from audits, Management Reviews and participants’ suggestions;
- any dysfunctions that appear.

4 PLANNING

4.1 Identifying risks

SSE_CREOCEAN risk assessment gives details of how risks are identified and assessed.

The stage analysing the significant environmental aspects (SEAs) and Occupational Health and Safety (OHS) risks is the basis on which the management system (MS) will be deployed.

It actually conditions how several fundamental parts of the system are defined and implemented:

OHS risks are identified in the SSE_CREOCEAN Risk assessment tool that groups together all risks and helps to assess the employee risk level in each work unit. The assessment of how well the identified risks are controlled gives the residual risk level.
All identified risks and the assessment method are given in detail in the risk assessment. A job difficulty sheet covers the risks for each employee in the *SSE_medical fitness document*. Some risks have their own directive in order to clarify the nature of the risk and the resources (technical, organisational and human) implemented such as the hyperbaric risk.

For each survey, the survey leader must complete a project execution plan. This document gives details of each stage required to complete the project on time: organisation, staff and equipment. This involves formalising how field operations are organised to be able to improve how the associated risks are handled for the staff, equipment and the environment. It describes how a field operation or an in-situ measurement campaign is going to be run, whether on-board or on dry land.

During survey with long boarding or with irregular operations and / or exceptional (see the SSE coordinator), this refers to a project execution plan (PEP) and during short survey or with boarding at the day, a simplified project execution plan (PEPS). The forms are available on the document base *SSE_FOR PEP* and *SSE_FOR simplified PEP*.

Ships owned by CREOCEAN each have a DUP, the ship’s own risk assessment.

### 4.2 Legal requirements

Information on how to handle legal and other requirements is given in the procedure: *SSE_PRO_legal requirements*.

The HSE coordinator uses the "Regulation surveillance EHS professional solution" tool from legislative publishers. This online tool helps him/her to identify and register EHS texts that can be applied to CREOCEAN business activities and to manage compliance and associated justification.

He/she runs surveillance at least every 6 months, when there is a specific modification to the business activity or following information sent from a stakeholder.

### 4.3 Goals and management programme

Goals are defined by the Management depending on the policy, the legal requirements, audits, dysfunctions and employee comments.

They become part of an action plan depending on operational, financial and technological requirements, described and monitored in the *SSE_management programme tool*.

The Management Review analysed whether goals have been met and the action plan’s effectiveness. The Management then decides on new annual goals in an attempt to continuously improve.

### 5 IMPLEMENTATION AND OPERATION

#### 5.1 Responsibilities

Responsibilities for the different stakeholders (CEO, HSE coordinator, Human Resources, agency director, etc.) are identified in the procedures.

**Managing Director**

- Define the general HSE strategy, policy and goals
• Set budgets to implement the resources required for Company development, to provide quality service whilst making sure that employees’ health and safety and the environment are not affected
• Take part in defining and promoting the HSE system among all staff
• Perform the management review
• Define, promote and follow QSE action plans
• Ensure that any faults detected are analysed and corrected
• Ensure that employees’ skills and qualifications are maintained
• Validate the training plan

**Agency manager**

• Promote the HSE system among all agency personnel
• Promote and follow QSE action plans
• Report and monitor detected faults

**HSE coordinator**

• Draft and update all procedures, directives and grids
• Validate HSE documents (content, coding, version)
• Register documents
• Report and monitor incidents and detected non-compliance
• Manage HSE cell
5.2 Skills and training

Employees' skills are assessed during the initial recruitment interview and annual appraisals depending on how the tasks they carry out are evolving.

The skills assessment is based on:

- Tasks completed;
- Equipment used;
- Risks undertaken;
- Regulations in force.

The _SSE_PRO training and awareness-raising_ procedure describes the skills assessment and resources to be implemented for employees to gain these skills. Each employee will be made aware of the implemented management system and how it changes.

5.3 Communication

The different internal and external communication actions are described in the _SSE_PRO communication_ procedure.

In terms of external communication, CREOCEAN provides information on employee health and safety to the occupational medicine dept. and other state organisations. CREOCEAN also tells its customers and suppliers about its HSE policy and the resources implemented to meet its EHS goals.

CREOCEAN has several channels of internal communication (Internet employee survey, meetings, mails) with no defined frequency depending on the size of the company and the risks involved.

5.4 Document management

The ways of handling documentation are given in the procedure: _SSE_PRO_document handling._

5.4.1 HSE system documentation

The different documents used in the system are:

- This manual: main document describing the HSE management system;
- Procedures relating to the ISO 14001 and OHSAS 18001 standards: documents defining how the management system operates;
- HSE procedures pertaining to CREOCEAN business activities;
- Professional and environmental risk mapping;
- Risk Assessment;
- The forms required by the document framework and the expected information;
- Records: keeping a written trace of procedure implementation. These are records relating to the management system (internal audits, dashboards, etc.) or pertaining to assignments (PEP, incident report, etc.);
- The EHS management programme;
- The Company Profile: document giving details of CREOCEAN business activities, its resources and its equipment.
5.4.2 Documentary information system

The documentary information system, commonly known as the document base, can be accessed by all staff. It is on the CREOCEAN extranet in the CHSCT – SSE tab.

A copy of the documents is available in paper version from the human resources dept. that keeps the archives.

5.4.3 HSE manual management

5.4.3.1 DRAFT, VERIFICATION AND APPROVAL

The HSE coordinator drafts and verifies the HSE manual working with all employees.

The HSE manual is approved by the Managing Director.

5.4.3.2 DIFFUSION

The HSE coordinator is responsible for sending out the HSE manual to make sure it is controlled effectively. It is sent to all agency managers who make it available to all employees.

5.4.3.3 EVOLUTIONS AND UPDATES

The HSE coordinator checks and updates the HSE manual once a year to include internal audits, decisions made in the management review, evolutions in the scope or the business activities, etc.

Modifications are reviewed and approved by the same positions as for the original document.

5.4.3.4 ARCHIVING

The HSE coordinator keeps a trace on the HSE manual evolution by filing a duly identified copy of previous versions.

5.4.4 Documentation managed by the agencies

- Site safety (fire instructions)
- Site related training

5.4.5 External documentation

This refers to external documents that might have to be registered when they affect the management system:

- Procedures, operating methods and/or audits, customer HSE classification;
- Customer, subcontractor and supplier contracts;
- Regulation texts that can be applied to the business activities involved or best practice guides.

5.5 Operational handling

CREOCEAN's operational control relies on assignment sheets, diving sheets and project execution plans that are completed for each assignment by the project leaders or the assignment leaders, checked by the HSE coordinator and approved by the CEO. The SSE_PRO work permit procedure describes how these documents are used.
Some assignments might require subcontracting, particularly concerning equipment. Associated risk identification falls within the *SSE_subcontractor assessment procedure*. Each subcontractor is thereby assigned a green status (no reservations), yellow status (requiring corrective actions) or red status (compensatory methods are implemented by CREOCEAN).

When contracting services concerning ship rental, processing samples in a laboratory or subcontracting divers, suppliers must systematically hand in the regulation documents and authorisations with their latest updates.

### 5.6 Emergency situations

CREOCEAN has identified 3 emergency situations:

- Fire risk;
- Domino effect industrial risk for companies located in La Pallice industrial estate;
- Hyperbaric risk.

The instructions for each emergency situation and the efficacy assessment for implemented resources are described in the *SSE_PRO emergency situation procedure*.

This procedure is repeatedly mentioned in awareness-raising and internal communications.

### 6 VERIFICATION

#### 6.1 Measurement & surveillance

The *SSE_surveillance and measurement procedure* describes the resources used to identify whether programmed goals have been reached and to maintain performance levels over time.

Goal monitoring corresponds to completion and effectiveness of actions planned during the management review as well as meeting expected results.

Improving and/or maintaining a certain level of operational performance is carried out through daily indicator monitoring, for example concerning water or energy consumption or the quantity of waste produced, the frequency rate and the severity of work accidents, etc.

Lastly, improving and/or maintaining a certain level of management system performance means that elements can be monitored such as the number of hours of HSE training, carrying out scheduled audits, dealing with non compliances, proper completion of preventive maintenance, etc.

Periodic checks on equipment, the risk assessment, how regulations change and employee authorisations.

HSE management programme monitoring is regularly operated by the HSE coordinator who guarantees that the management's goals are progressing.

#### 6.2 Compliance assessment

The *SSE_PRO legal requirements* procedure describes the resources implemented to identify the applicable regulations and the justifications for CREOCEAN compliance as well as any other requirements such as from foreign customers.
6.3 Non-compliance, corrective and preventive actions

Non-compliances likely to be identified might be:

- A deviation between the management system (procedures, manual, etc.) in place and what has been ordered within the framework of reference documents; this is known as a document deviation;
- A deviation between operational practice and what is ordered within the framework of the system: procedure not applied; this is known as an application or practice deviation;
- A deviation from the regulations;
- A potential or proven dysfunction, human or technical, causing a risk for health and safety;
- A dangerous situation.

The **SSE_PRO non-compliance assessment** procedure describes the resources to record, analyse and deal with actions to be implemented when non-compliance is detected.

6.4 Audit

The EHS coordinator plans and organises management system audits. He/she has a list of qualified auditors according to criteria in the ISO 19001 standard.

7 MANAGEMENT REVIEW

The Management review is used to assess the management system's effectiveness and validate the action programme for the year to come.

The Management Review will be performed every year depending on the in-coming and out-going elements described in the **SSE_PRO management review** procedure.

The HSE coordinator uses the **SSE_INS ODJ management review guideline** to prepare the meeting. He will send the elements to the stakeholders invited by the CEO at least 1 week before the meeting.

8 TERMINOLOGY AND ABBREVIATIONS

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<tr>
<td>SEA</td>
<td>Significant Environmental Aspects</td>
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<td>DUP</td>
<td>Risk Assessment document, compulsory for cargo ships and attached to the ship</td>
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<td>PEP</td>
<td>Project Execution Plan</td>
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<tr>
<td>PEPS</td>
<td>Simplified Project Execution Plan</td>
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<tr>
<td>QMS</td>
<td>Quality Management System</td>
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<tr>
<td>EHS</td>
<td>Environmental Health and Safety</td>
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