



ENGIE BENELUX

ZERO TOLERANCE FOR UNSAFE BEHAVIOUR IN OUR INDUSTRIAL PROJECTS

REFERENCES

- Decision ENGIE 2016 – 002: Industrial Projects Oversight & Support function - Group Policy;
- Group Health And Safety Rule RG 09 Health and Safety in projects and acquisitions – Rev 1 – January 2016;
- Large Projects & Procurement Mission and Organization (March 2016);
- Letter of Isabelle Kocher to ENGIE 50 about Fatal events – dated September, 5th 2016.

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1. Purpose

The security of our own personal and subcontractors is essential in all our Industrial Projects. The lessons learned from past events have clearly identified the main frequent causes of accident which triggered the publication of our "Life Savings Rules":

OUR LIFE-SAVING RULES

Target: **zero** fatal accident



Do not walk or stand under a load.



Do not perform hot work unless the fire or explosion risks have been eliminated.



Stay out of the path of moving vehicles, plant and equipment.



Verify that there is no live energy (mechanical, chemical, electrical, fluids under pressure, etc.) before starting work.



Clip on your harness when working at height.



Do not handle your phone or any other communication device when driving.



Only enter a trench if the appropriate wall supports are in place.



Do not drive under the influence of alcohol or drugs.



The atmosphere must be tested safe before entering a confined space and monitored as you work.

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The strict compliance to these rules are a key success factor in our target of zero fatal accidents and best in class results in safety. In order to achieve this compliance the inappropriate behaviours have to be clearly sanctioned.

This document describes how to go about sanctioning these behaviours.

Although some adaptations to the local context are always possible, the following principles must strictly apply in any circumstances:

- Inappropriate behaviours subject to a yellow card must be notified to the concerned worker and his company and must be listed in a register;
- A second notification in the first 3 months following the first one will lead to the banishment of the worker from our Industrial Project Sites;
- Inappropriate behaviours subject to a red card will lead to the banishment of the worker from our Industrial Project Sites and must be notified to the worker's company and listed in a register.

2. Scope

This policy applies to all activities related to Industrial Projects performed in all ENGIE BENELUX sites or Customer sites by contractors' staff. References to contractors in this document include subcontractors too.

3. Policy

The *Zero Tolerance for Unsafe Behaviour* policy was drawn up to clearly identify unacceptable behaviours. It includes a list of violations and the associated penalties which go from a notification (yellow card) to a banishment of the site (red card) depending of the gravity of the unsafe behaviour (non-compliance to our Life Saving Rules is sanctioned by the banishment).

3.1. Issuing warnings and penalties

ENGIE BENELUX managers can issue red and yellow cards to contractors' staff. They may do so on the basis of the list of violations provided in section 3.4. Any manager who issues a red or yellow card must report this to site management. Site management decides the actual measures to be taken and applies them. An employee may only be banned from the site by site management – site management is ultimately responsible.

For actions not appearing on the list of violations, site management may nonetheless decide to issue a red or yellow card and apply penalties. This would be the case for situations in which an employee's actions have posed a serious threat to safety, in connection with reckless, negligent behaviour.

Site management also has the option of issuing a red or yellow card to the supervisor of a contractor who commits a violation.

3.2. Yellow card

- **1st yellow card**
 - Discussion of the violation there and then;

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- Meeting with the site manager about the consequences of receiving another yellow card;
- Letter to the contractor.
- **2nd yellow card**
 - Conversion to a red card;
 - Treatment as for a red card.

Once issued, a yellow card expires if the employee does not receive a yellow card or warning in the three months after being given the yellow card.

3.3. Red card

- **1st red card**
 - The employee is banned from the Industrial Projects site in question;
 - A meeting is held between site management and the contractor's company management to make commitments for improvement;
 - Discussion of the violation there and then.
- **2nd red card for the employee**
 - The employee is definitely banned from the Industrial Project Site.

The decision on whether to re-admit offenders and allow them to perform work on the site is in the hands of the management team at the site where the red card was issued. The following steps must be taken, and the commitments made are recorded at the site:

- The management of the employee that has been banned requests a meeting with site management and the HSE representative;
- An action plan detailing how the safety-related provisions will be observed and how the listed violations that were committed will be avoided is presented. Until this happens, the offender remains banned from the site;
- In case of violation by a contractor's staff, additional agreements are made regarding the level of supervision required from the contractor's managers.

3.4. List of violations

3.4.1. Yellow card

Smoking where smoking is not allowed

(unless this is a red-card violation!)

Unacceptable:

- Smoking on-site;
- Smoking in the workplace.

Reason:

- Smoking in the units may cause a fire or an explosion;
- Smoke-free workplaces are a legal requirement;

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- Need to provide a safe workplace.

Not wearing the required personal protective equipment

Unacceptable:

- The employee is not wearing the required personal protective equipment;
- And, in exceptional circumstances, did not talk to the intervention manager about an exemption from the requirement to wear the PPE.

Reason:

- Not wearing PPE increases the chance of injury.

Deviating from the work order and/or work permit

(unless this is a red-card violation!)

Unacceptable:

- Performing other activities than the assigned task;
- Unauthorised and/or undesignated persons operating and switching process facilities or E-facilities;
- Operating or switching a process facility or E-facility without the consent of the Operations team leader or the installation manager;
- Operating or switching a high-voltage facility without the consent of the installation manager.

Reason:

- Operating or switching facilities without permission from Operations can result in unsafe situations and heighten the risk of process deviations and accidents.

A work area is so untidy and/or dirty that it is a hazard

Unacceptable:

- Blocking emergency exits and escape routes;
- Possibility that objects may fall from height;
- Risk of tripping over.

Reason:

- If emergency exits and escape routes are blocked, the employee cannot leave the room quickly and safely in the event of an emergency;
- Objects falling from height can cause life-threatening injury;
- Tripping over can cause injury.

3.4.2. Red card

Fail to stay out of the path of moving vehicles, plant and equipment

Unacceptable:

- Not complying with the traffic plans and the pedestrian-only zones.

Reason:

- Risk of being hit;
- **Our Life Saving Rule: "Stay out of the path of moving vehicles, plant and equipment"**

Working alcohol- and drug-free

Unacceptable:

- Consuming alcohol and/or drugs at work;
- Being in possession of alcohol and/or drugs on-site;
- Being under the influence of alcohol and/or drugs;
- **Our Life Saving Rule: "Do not drive under the influence of alcohol or drugs".**

Reason:

- Working under the influence of alcohol and drugs increases a person's chance of committing an error, and so raises the risk of work-related accidents involving that person or his/her colleagues.

A work permit must be held for all activities requiring one

Unacceptable:

- Performing activities on process-related facilities without a valid work permit.

Reason:

- Working on process-related facilities that have not been secured sufficiently, without a risk assessment or permission from the Operations team leader, increases the risk of a serious work-related accident;
- **Our Life Saving Rules :**
 - ✓ "Verify that there is no live energy (mechanical, chemical, electrical, fluids under pressure, etc.) before starting work";
 - ✓ "The atmosphere must be tested safe before entering a confined space and monitored as you work".

Working without fall protection in a place where fall protection is mandatory

Unacceptable:

- Working at a height of over two metres without fall protection or outside a safe area.

Reason:

- Falling from height results in serious injury, even from a small height, while falling from a great height is fatal;
- **Our Life Saving Rule : "Clip on your harness when working at height".**

Removing protective equipment, screens, enclosures or floor covers

Unacceptable:

- Removing protective equipment and screens from machines or mechanical tools then using them – for example, this could include removing the guards from angle grinders or rotating machinery or fixing a dead man's switch or similar device in position so as to work on it;
- Bypassing process protection without authorisation and without recording it in the log;
- Removing an enclosure or floor covering without the express permission of the Site Management;
- Working in or entering closed-off areas without authorisation (work permit);
- Entering lifting areas without authorisation and ignoring the equipment in place to close off lifting areas.

Reason:

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- Deliberately removing safety equipment generates a direct risk of crushing and cutting and can result in serious injury;
- Removing an enclosure or floor covering while the hazard is still there increases the risk of a work-related accident.

Unauthorised alteration of scaffolding

Unacceptable:

- Alteration of scaffolding by unauthorised employees.

Reason:

- If scaffolding is altered by staff who are not authorised to do so, there is a greater risk that it will be unsafe.

Ignoring a smoking ban in areas with a high risk of explosions or fire

Unacceptable:

- Smoking in areas where there is a high risk of explosions or fire.

Reason:

- Smoking in the units can have very serious consequences as it may cause a fire or an explosion;
- **Our Life Saving Rule : "Do not perform hot work unless the fire or explosion risks have been eliminated".**

Using work equipment without the valid diploma or certificate required for its operation

Unacceptable:

- Using work equipment without the valid diploma or certificate required for its operation.

Reason:

- Employees who have not received sufficient training or does not have an appropriate certificate may jeopardise their own safety and that of others, as well as the facilities' safety.

Entering a trench although not authorised to do so

Unacceptable:

- Entering a trench although the appropriate wall supports are not in place.

Reason:

- Risk of being buried;
- **Our Life Saving Rules : "Only enter a trench if the appropriate wall supports are in place"**

Walking or standing under a load

Unacceptable:

- Going beyond a barrier indicating a hoisting zone with authorisation;
- Circulating under a load.

Reason:

- Risk of falling of the load;



- **Our Life Saving Rules : “Do not walk or stand under a load”.**

4. Tasks

Site management

- Applying the penalties associated with red and yellow cards;
- Submitting the data pertaining to a contractor who received a red or yellow card to the HSE manager within 24 hours;
- Officially notify the Contractor when a Yellow/Red card is given (letter);
- Holding a meeting with the contractor’s management if a red card is given;
- Performing an RCA (Root Cause Analysis);
- Report the numbers of penalties (yellow/red cards) in the monthly project report.

ENGIE BENELUX managers

- Issuing red and yellow cards;
- Calling people to account for undesirable behaviour;
- Immediately informing site management.

Security manager

- Collecting the access passes of people who have been banned from the premises;
- Blocking the access passes of people who have been banned.

HSE Department

- Taking part in meetings with contractors who have received red cards.

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