



ENGIE BENELUX

ZERO TOLERANCE FOR UNSAFE BEHAVIOUR IN OUR INDUSTRIAL PROJECTS

Application within Renewable Energies Belux

REFERENCES

- ZERO TOLERANCE FOR UNSAFE BEHAVIOUR IN OUR INDUSTRIAL PROJECTS – V.1 – 23-12-2016
- 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;
- Manager's Guidelines – Our Life Saving Rules – dated May 2015.

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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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More detailed information about these Life Saving Rules can be found in the brochure:

<http://prevention.engie.com/en/communication/communication-tools/the-life-saving-rules-brochure/>

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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. This document is an adaptation of the Corporate document, to take into account the specifics of projects in and organisation of the Renewable Energies Belux department (RES).

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. When a worker is banned from site, the contractor must provide a replacement within the time period agreed in the contract;
- 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. When a worker is banned from site, the contractor must provide a replacement within the time period agreed in the contract;

2. Scope

This policy applies to all activities by contractors' staff related to Industrial Projects performed for Renewable Energies Belux. 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 non-exhaustive list of violations and the associated penalties which go from a verbal notification, a yellow card to a banishment of the site (red card), depending on the gravity of the unsafe behaviour.

The methodology used to determine the penalties for unsafe behaviour is based on ENGIE's Manager's Guidelines for our Life Saving Rules.

3.1. Issuing notifications and penalties

ENGIE BENELUX managers can issue verbal notifications, yellow and red cards to contractors' staff. They may do so on the basis of the list of violations provided in section 3.3 and 3.4. Any manager who issues a verbal notification, yellow or red card must report this to the project leader REAL (realisation RES). The project leader REAL decides the actual measures to be taken and applies them. An employee may only be banned from the site by the project leader REAL – he is ultimately responsible.

For actions not appearing on the list of violations, the project leader REAL may nonetheless decide to issue a verbal notification, a yellow or red 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.

The project leader REAL also has the option of issuing a verbal notification, a yellow or red card to the supervisor of a contractor who commits a violation.

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In both cases described here above, the project leader REAL bases his decision on the methodology of ENGIE’s Manager’s Guidelines for our Life Saving rules, as described in the table below.

Reason for non-compliance with a rule	First occurrence	Second occurrence	Third occurrence	Fourth occurrence
Foul play or Sabotage / Breach of safety rules or a Life Saving Rule <u>causing a serious and immediate safety threat</u>	Red card			
Breach of safety rules or a Life Saving Rule <u>causing a safety threat</u>	Yellow card	Red card		
Breach of safety rules <u>causing a minor safety threat</u>	Verbal notification	Yellow card	Red card	
Failure to understand the rule	Reminder / Training / Refresher course	Verbal notification	Yellow card	Red card

3.2. Penalties

- **Verbal notification**
 - Discussion of the violation there and then;
 - Meeting with the project leader REAL about the consequences of unsafe behaviour and the penalties of the zero tolerance policy;
 - Registration of the verbal notification in the RES incident register.

- **1st yellow card**
 - Discussion of the violation there and then;
 - Meeting with the project leader REAL about the consequences of receiving another yellow card;
 - Formal mail to the contractor;
 - Registration of the yellow card in the RES incident register.

- **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.

- **1st red card**
 - Discussion of the violation there and then;
 - The employee is banned from the Industrial Projects site in question;
 - A meeting is held between project leader REAL and the contractor's company management to make commitments for improvement;
 - Registered letter to the contractor;
 - Registration of the red card in the RES incident register.
- **2nd red card for the employee**
 - The employee is permanently banned from the Industrial Project Sites of Renewables Energies Belux.

The decision on whether to re-admit offenders and allow them to perform work on the site is in the hands of the construction manager of RES. The following steps must be taken, and the commitments made are recorded:

- The management of the employee that has been banned requests a meeting with the construction manager of RES, the project leader REAL and the HSE representative of RES;
- 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 of this action plan by a contractor's staff, additional agreements are made regarding the level of supervision required from the contractor's managers.

3.3. List of violations of safety rules causing a (serious and immediate) safety threat

The following violations will, on their first occurrence, result in either a yellow or red card. The severity of the penalty (yellow or red) will depend on the seriousness of the violation, as well as on the imminence of the safety threat. This will be judged by the project leader REAL.

a) Violation of a Life Saving Rule

Unacceptable:

- Violating one of ENGIE's Life Saving Rules (see §1);

Reason:

- These rules have been put in place to prevent fatal accidents.

b) Smoking where smoking is not allowed on industrial sites

Unacceptable:

- Smoking in areas other than designated smoking areas;

Reason:

- Smoking in the units may cause a fire or an explosion;
- Smoke-free workplaces are a legal requirement;
- Risk of explosion of chemicals on industrial sites;
- Need to provide a safe workplace.

c) Deviating from the work order and/or work permit

Unacceptable:

- Performing other activities than the assigned task;
- Unauthorised and/or undesigned persons operating and switching process facilities;
- Operating or switching a process 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.

d) Removing protective equipment, screens, enclosures, floor covers or unauthorised alteration of scaffolding

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 project leader;
- Unauthorised alteration of scaffolding (removing guard rails, floor covers, etc.);
- Working in or entering closed-off areas without authorisation;
- Entering lifting areas without authorisation and ignoring the equipment in place to close off lifting areas.

Reason:

- 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.

e) 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.

f) Being under the influence of alcohol or drugs

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;
- See also 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.

Other violations of safety rules causing a (serious and immediate) safety threat will be evaluated by the project leader REAL.

3.4. List of violations of safety rules causing a minor safety threat

a) A work area is so untidy and/or dirty that it has become 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.



- b) **Not wearing the required personal protective equipment** (unless this is a violation of a Life Saving Rule → see 3.3)

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 (personal protective equipment).

Reason:

- Not wearing PPE increases the chance of injury.

Other violations of safety rules causing a minor safety threat will be evaluated by the project leader REAL.

4. Tasks

Project leader REAL

- Applying the penalties associated with the verbal notifications, yellow and red cards;
- Submitting the data pertaining to a contractor who received a yellow or red card to the HSE manager within 24 hours;
- Officially notify the Contractor when a yellow/red card is given (email/registered letter);
- Holding a meeting with the contractor's management if a red card is given;
- In case of major violations (to be determined in cooperation with HSE and the construction manager): performing an RCA (Root Cause Analysis);
- Report the numbers of penalties (verbal notifications/yellow/red cards) in the monthly project report.

ENGIE BENELUX managers

- Issuing penalties;
- Calling people to account for undesirable behaviour;
- Immediately informing project leader REAL.

HSE Department

- Taking part in meetings with contractors who have received red cards;
- Maintaining the register of incidents which contains the given penalties.

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