



CORPORATE PROCESS INTEGRATED MANAGEMENT SYSTEM (IMS) POLICY

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Revision History

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10	July 2017	Update of policy to include changes in Management and addition of company profile in policy statement	HSEQ	J Spellman	M Charles
11	Feb 2019	Update Organisation Chart and Reporting System	HSEQ	M Potter	M Charles
12	May 2020	Annual review and update as per guidance from DNV GAP Analysis	HSEQ	M Potter	M Charles

Control Status

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1. INTRODUCTION

1.1 OBJECTIVE

Aquatic Engineering and Construction, hereby called Aquatic, operates an Integrated Management System (IMS) and has a single policy encompassing Health and Safety, Quality and Environmental management. A signed statement of commitment by the Aquatic Chief Executive Officer and a plan of how commitment will be met is contained within the Integrated Management System policy.

1.2 SCOPE

The scope of the IMS policy includes all operations and activities of the business conducted at all Aquatic locations:

Tern Place House, Bridge of Don

South View Place, Peterhead

Loyang Offshore Supply Base, Singapore

and 900 Threadneedle, Suite 300, Houston

The Policy is available to all employees via SharePoint and Notice Boards

1.3 DEFINITIONS

Reference	Definition
AEIR	Adverse Event Investigation Report
ALARP	As Low As Reasonably Practicable
ALT	Aquatic Leadership Team
HSEQ	Health, Safety, Environment & Quality
IMS	Integrated Management System

1.4 REFERENCES

Reference	Description
IMS CPR HSEQ 03	Hazard Identification & Risk Assessment Procedure
IMS CPR HSEQ 05	Inspection & Observation Procedure
IMS CPR HSEQ 06	Communications Procedure
IMS DPR HSEQ 02	Adverse Event Investigation & Reporting Procedure

2. POLICY STATEMENT

2.1 COMPANY PROFILE

Aquatic is the market leading service provider for complete flex lay solutions to the oil and gas, renewable energy and telecommunications industries across five market segments. These five separate market segments include:

- Projects – New field developments and existing field tiebacks
- Inspection Repair and Maintenance – Field life extension or repurposing of assets
- Decommissioning – retrieval and disposal of subsea assets
- Renewables – Offshore wind and tidal energy
- Asset Management – maintenance and preservation of client equipment

Aquatic maintains a strong global footprint and looks to increase this global coverage beyond our offices/equipment hubs in Aberdeen (head office), Singapore, Houston and Morgan City whilst being supported by the Global Centre of Excellence located at Peterhead.

As part of the Acteon Group we are supported by the world's largest independent subsea services company. Acteon's products and services span all phases of field operations from exploration and construction through to decommissioning.

Our business strives to develop strong relationships with our clients by demonstrating our service value and experience while maintaining safety and quality performance.

2.2 OUR COMMITMENT

Aquatic is committed to protecting the health and safety of everyone who either plays a part in our operations, lives in the communities in which we operate or uses our products and services.

During our operations, we will also conduct our business with respect and care for the environment. We will strive to eliminate all injuries, occupational illnesses, unsafe practices and incidents of environmental harm from our operations through a programme of hazard and risk evaluation, and elimination where practical.

Strong client focus will be maintained with the aim of enhancing client satisfaction through the consistent delivery of quality products and services that meet all the agreed client requirements.

2.3 OUR PLAN

To meet our commitment, Aquatic will:

- Demonstrate visible and active leadership that engages all company employees.
- Manage Health, Safety, Environmental and Quality (HSEQ) performance with clearly defined roles, responsibilities and authorities.
- Comply with applicable Health, Safety and Environmental (HSE) legal requirements and with other HSEQ requirements to which the company subscribes.

- Ensure that all employees and contractors understand that working safely is a condition of employment, and that they are each responsible for their own safety and the safety of those around them.
- Manage all projects, products and processes through their life cycle in order to protect safety, support health and to prevent pollution.
- Identify the environmental aspects, impacts, risk and opportunity that our activities have on the environment and minimise/mitigate these through the adoption of appropriate working practices and procedures, engineering solutions and training as far as reasonably practicable.
- Provide employees with the capabilities, knowledge and resources, both financial and physical, to gain involvement through workers representatives, to provide opportunity for consultation and participation, instil personal ownership and generate motivation to achieve HSEQ excellence.
- Provide relevant HSEQ information to contractors and require them to provide suitable competent personnel and procedures for the performance of work in a safe and environmentally sound manner and of the required quality.
- Communicate the IMS Policy to all persons working for or on behalf of the company.
- Make the IMS Policy available to the public and other interested parties.
- Measure, audit and review Health, Safety, Environmental and Quality performance against established objectives and targets.
- Actively engage in the continual improvement of the HSEQ management system and its outcomes.

2.4 OUR EXPECTATIONS

Through implementation of this IMS Policy, combined with the periodic reviews to ensure its continued suitability, Aquatic aims to be recognised as a leader in Health, Safety, Environment and Quality performance.

Martin Charles
Chief Executive Officer
Aquatic Engineering & Construction
Date: May 2020

3. AQUATIC HSEQ ORGANISATION CHART



4. HSEQ ROLES AND RESPONSIBILITIES

4.1 AQUATIC LEADERSHIP TEAM AND SENIOR MANAGEMENT TEAM

Will ensure that all necessary financial and physical resources are made available to support and implement the HSEQ Policy which complies with the requirements of the Acteon Way to ensure the safety of our employees, contractors and to safeguard our communities and our environment. This shall be achieved by following a zero-tolerance approach to unsafe acts or conditions, where a proactive safety culture can flourish and all members of staff know that they have the ability and power to challenge and stop unsafe acts and conditions.

A responsible approach will be taken to the consumption of natural resources to provide raw materials, energy, and processing. The aspects and impacts of our process and operations will be reviewed regularly with a goal of minimising Aquatic’s impact on the environment and committing no regulatory breaches.

The business Health, Safety, Environmental and Quality Management (HSEQ) system is supported by the Intelex software system which is used by Aquatic and the Management Team to support reported areas of focus and continuous improvements.

4.2 PROJECT MANAGERS AND ENGINEERS

Will ensure that all projects are planned with a comprehensive and competent set of HSEQ documentation, constructed in a way which fully supports all aspects of an efficient IMS and is effectively communicated with all persons engaged on the project. Developing strong working

relationships with client representatives is a key element of the role of a Project Manager/Engineer with a view to enhancing customer satisfaction and exploring future work opportunities.

4.3 SUPERVISORS

Will lead a proactive approach to safety by ensuring that pre job risk assessments have been completed and understood and all controls identified have been put into place and are effective in controlling risk to As Low as Reasonably Practicable (ALARP).

4.4 EMPLOYEES

It is the duty of every employee to contribute to the safety culture of Aquatic by actively engaging with employers, co-workers, all procedures and company policies.

Aquatic employees must take care of their own health and safety and that of people who may be affected by what they do (or do not do).

Employees must co-operate with others on health and safety and not interfere with, or misuse anything that has been provided for anyone's health, safety or welfare.

Employees must follow the training that they have received when using any work items that Aquatic provides for use.

All Aquatic employees have the power and the obligation to challenge and intervene if they witness unsafe acts or conditions. By doing so employees are promoting a proactive safety culture. Aquatic expect all employees to demonstrate environmental awareness and to follow acceptable waste management practices at all of our locations and project sites.

4.5 CONTRACTORS & SUB-CONTRACTORS

Responsible for ensuring that all work carried out for, or on behalf of Aquatic is undertaken with full Hazard Identification and Risk Assessments. This documentation is to be provided to the HSEQ Department prior to the commencement of works. All contractors will be subject to the stringent Aquatic HSEQ policies & procedures to ensure work is carried out safely at all times.

5. HEALTH AND SAFETY MANAGEMENT

Aquatic is committed to ensuring the health and safety of all our employees and those that work with and alongside us who may be affected by our operations. Our primary objective is to carry out all projects, operations and support activities safely with no harm to anybody or anything with a clear and transparent commitment to continually improve all working practices.

6. QUALITY MANAGEMENT

It is the goal of Aquatic to be known by the Offshore Oil & Gas industry as the supplier of choice with an unrivalled standard of quality service and product in response to the needs of our customers and

to excel in the challenges put before us. Aquatic has a commitment and focus on the Continuous Improvement of services and products, through Lean approaches and our 5S standard Centre of Excellence, which is critical to meet requirements of Stakeholders, Customers, Employees and to reduce the Cost of Poor Quality to the business.

Aquatic's Continuous Improvements and Lean approaches form part of the Company Strategy, HSEQ objectives and individual employee Goal Setting, set each year, and is monitored and measured on a regular basis, through different reporting systems i.e. Intelex, Acteon People Portal (APP), Sharepoint, Project Lessons learnt and Management Review.

7. ENVIRONMENTAL MANAGEMENT

Aquatic is committed to ensuring that all of its activities are completed in an environmental responsible manner. Our aim is to protect the environment and prevent pollution at all times and apply continual improvement to better our overall environmental performance.

8. COMMUNICATION

To ensure that there is always a line of communication for any member of staff to raise health, safety, environmental or quality concerns Aquatic have a number of formal routes:

- Discuss with Supervisor / Manager
- Discuss with HSEQ Department
- Complete an HSEQ Observation Card (Intelex or Manual submission)

9. STOP WORK FOR SAFETY

To demonstrate the Aquatic Leadership Team's (ALT) commitment to ensure safety is considered above all other business demands, the Chief Executive Officer of Aquatic has written an open letter "Stop Work for Safety" to all employees, stating the need for all employees to come forward if they believe there is a safety issue. No employee will be punished as a result of stopping work that they believe to be unsafe. Employees will have the full support of the ALT regardless of the outcome of the intervention.

9.1 STOP WORK FOR SAFETY PROGRAMME STATEMENT

Aquatic promises always to take safety seriously.

To that end, our HSEQ Team, staffed with experienced and qualified advisors, and actively supported by the Aquatic Leadership Team, values the input of all employees in our goal to improve our IMS and reduce the probability for accidents to happen.

Our Stop Work for Safety programme recognises the invaluable experience that all of our onshore and offshore based employees possess. It allows each of us the opportunity to ensure that no job commences, or continues, that any one of us believes to be unsafe.

Any use of the Stop Work for Safety system will always be taken positively. In other words, this means there will never be any comeback on you even if you incorrectly call a halt to a job you think is unsafe. Whatever the outcome, all our employees will receive the full backing and support of the ALT.

We always maintain a strong focus on our clients, with the aim of enhancing their satisfaction through the consistent delivery of quality products and services that meet all our mutually agreed requirements. We will always endeavour to meet the requirements of our customers, but we will never sacrifice safety in order to do so.

So essentially...

Who can invoke “Stop Work for Safety”?

Anyone, you don’t have to be an expert in the area of concern and you don’t have to be involved in the work in question.

How do I “Stop Work for Safety”?

If you feel that the job you are working on is unsafe, stop the work and notify your supervisor. If it is the work of others, tell them and their supervisors that you believe what they are doing is unsafe and request they stop work until the situation is resolved.

What will happen to me personally if I “Stop Work for Safety”?

Nothing, we guarantee no comeback if Stop Work is called, and you just might get the thanks of someone you save from a serious accident.

Aquatic aims to be recognised as a leader in Health, Safety, Environment, and Quality performance.

Martin Charles
Chief Executive Officer
Aquatic Engineering & Construction
Date: May 2020

10. RISK MANAGEMENT

To be compliant with the Management of Health and Safety at Work Regulations, SI 1999/3242 (as amended), Aquatic has a duty of care to ensure, so far as reasonably practicable, the health, safety and welfare of all employees in every aspect related to their work and to the environment in terms of ensuring no detrimental occurrences.

The purpose of carrying out risk assessment is to ensure that the necessary control measures are implemented for the health and safety of Aquatic’s employees and others who may be exposed to risk while working at or visiting Aquatic premises or worksites.

Risk assessments shall take the form of a Generic Risk Assessment, Equipment Specific Risk Assessment or a Task Risk Assessment. The responsibility of generating any risk assessment falls on the individual or team who will be conducting the activity.

The process of generating a risk assessment is described in IMS CPR HSEQ 03. A risk assessment is to be completed using form IMS CPR HSEQ 03 FM01. Guidance for completing risk assessments is provided via IMS CPR HSEQ 03 INFO 01.

The HSEQ Department is responsible for the risk assessment process and is available to give guidance and advice as necessary.

11. CONSULTATION WITH EMPLOYEES

Employees shall be consulted on any significant changes to their HSEQ arrangements via:

- HSEQ Briefings
- SharePoint Employee Zone
- Communications Update
- Business Briefs

12. SAFE PLANT AND EQUIPMENT

The Equipment Manager will ensure that all equipment which has a regulatory maintenance or calibration requirement will be identified. Records of maintenance and calibration of plant and equipment shall be maintained at Aquatic's Peterhead facility.

13. USE, HANDLING, STORAGE AND TRANSPORTATION OF MATERIALS

Hazardous substances are controlled accordingly with COSHH Regulations (Control of Substances Hazardous to Health Regulations 2002 as amended). The HSEQ Department are responsible for generating COSHH assessments for substances that Aquatic utilise. COSHH assessments are made available to all staff via the COSHH online portal and shall be made available to clients upon request.

14. OCCUPATIONAL HEALTH SURVEILLANCE

Aquatic believe that our greatest resource is our staff. We will provide an occupational surveillance programme to all employees. Employees who have been identified at higher risk due to the nature of their job shall receive a tailored surveillance programme to reflect the physical, chemical or psychological agents which they may be exposed to.

15. INFORMATION, INSTRUCTION, TRAINING AND SUPERVISION

The United Kingdom Health and Safety Executive Law Posters are located in the Peterhead Workshop and Aberdeen Office. New employees follow an induction programme in the first three months of joining the company. During this three months process all relevant job training is identified and the employee is offered additional support and supervision.

16. WORKING ENVIRONMENT AND WELFARE FACILITIES

The Aquatic Chief Executive Officer shall ensure that all locations and facilities at Aquatic are suitable and sufficient for their intended purpose with appropriate welfare requirements.

17. FIRST AID, ACCIDENTS, INCIDENTS AND ILL HEALTH ARRANGEMENTS

Employees must receive immediate attention if they are taken ill or are injured at work. Accidents and illnesses can happen at any time and first aid can save lives and prevent minor injuries from becoming major ones.

Aquatic's current first aiders details are displayed on various notice boards within the facilities located at Aberdeen, Singapore and Peterhead.

First aid equipment is kept and maintained at Aberdeen, Singapore and Peterhead locations and within company vehicles.

In the event of an accident or incident taking place, your Line Manager must be informed at the earliest opportunity. The details of any health, safety, environmental or quality related incident (including near miss) must be recorded via the Adverse Event Investigation Report (AEIR) process using form IMS DPR HSEQ 02 FM01 and sent to your Line Manager and the HSEQ department.

An investigation may be required to determine the root cause of the incident and appropriate measures put into place to ensure that repeat performance does not occur.