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REVISION NO:	PAGE:
6	Page 1 of 17

TITLE: HSE MANUAL

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Table of Contents

TABLE	OF CONTENTS	
1.0	INTRODUCTION	
1.1	OBJECTIVE	
1.2	SCOPE	
1.3	BACKGROUND INFORMATION	
1.4	HSE POLICY	
1.6	OUR COMMITMENT TO OUR EMPLOYEES	
1.7	OUR MANAGERS WILL:	
1.8	OUR EMPLOYEES WILL:	
2.0	DEFINITIONS AND ABBREVIATIONS	
_	STAR MARINEPRO HSE MANAGEMENT	
3.0 3		
3.1		
3	.1.1 THE SMP TECHNICAL DIRECTOR OR REPRE	
•	.1.2 THE SITE MANAGER	
	.1.3 THE SUPERINTENDENT	
3.2	INCIDENT REPORTING FOR SMP PERSONNEL	14
4.0	SITE OFFICE	14
4.1	SITE OFFICE FACILITY SAFETY	14
4.2	RESPONSIBILITIES	15
4.3	SITE OFFICE PROCEDURES	
4	.3.1 SAFETY TRAINING	
4	.3.2 PERSONNEL ON BOARD SYSTEM (POB)	
4	.4.3 PERSONAL PROTECTIVE EQUIPMENT (PPE)	
4	.4.4 SMOKING	
4	.4.5 ALCOHOL & DRUGS	
APPEN	NDIX A- PERSONAL PROTECTIVE EQUIPMENT (PPE)17



PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 2 of 17

TITLE: HSE MANUAL

1.0 INTRODUCTION

Health, Safety and Environment (HSE) is a line responsibility and through leadership and commitment of all employees and management of entire Star MarinePro organization. Our Offices and Site Offices must be a safe and accident-free workplace.

1.1 OBJECTIVE

The objective of this document is to provide HSE governance for office staffs and staffs participating in Newbuilding, Conversion or retrofit activities, Dry Dockings or other similar related projects when there's no HSE governance designated by the owner and yard. The HSE Manual must guide and prepare site office personnel as well as visitors and crew for work in a shipyard environment.

In addition, the document is to ensure that construction as well as supervision and inspection work on site and at subcontractors are conducted in a safe manner and in accordance with local legislation and Shipyard requirements.

1.2 SCOPE

This procedure is applicable for all related personnel working in the shipyards (including Visitors, 3rd party vendors, service engineers, and vessels crew).

This procedure describes the requirement and responsibilities of the relevant personnel in connection with work in the site offices and at shipyards, as well as the general requirements from the shipyards to ensure the safety of the visiting and permanent personnel.

This Procedure addresses the responsibilities of personnel to manage safety and raise environmental concerns everywhere does business and recommend improvements where needed.

1.3 BACKGROUND INFORMATION

The Site office is within the Shipyard's facilities and is managed in accordance with yard HSE Management plan and procedures. In case of conflicts between shipyard and Star MarinePro, HSE Policies and procedures, the Site Office Requirements are aligned to the yard's HSE Policy.

The contents are authorised for issue by Star MarinePro Management and should be readily available to all SMP employees and customers and visitors.

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PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 3 of 17

TITLE: HSE MANUAL

1.4 HSE POLICY

Star MarinePro (SMP) Site Offices are fully committed to preventing injuries and minimizing risks to health and safety of our employees and to continually improving our health and safety culture and performance.

Star MarinePro Site Offices will therefore provide adequate time and resources for the implementation of this policy and the supporting safety management system.

Managers are accountable for minimising health and safety risks for our employees, clients, crew and visitors; however, we are all responsible for keeping ourselves and those around us safe. We thus expect everyone to take a lead in improving safety by setting a positive example and intervening when observing an unsafe situation.

Our employees will refuse to undertake work which they consider compromises their health or safety and stop unsafe or hazardous work that may result in incident. Their managers will support them if they take these decisions.

Star MarinePro Site Offices will assess the risk at all our locations to ensure that our measures are robust and suitable. Our employees will only work on worksites that we considered safe.

We are all responsible for reporting health and safety incidents and issues to contribute to a safer workplace. Incidents will be investigated, and we will learn from them. Corrective and Preventive measures will be implemented.

Improving our safety culture is the responsibility of every one of us and we all have a contribution to make.

1.5 COMMITMENT

Star MarinePro Site Offices has made it its mission to always deliver safety and environmental standards fulfilling Star MarinePro customers' requirements and be a proactive advisor in all areas of safety for all parties involved.

1.6 OUR COMMITMENT TO OUR EMPLOYEES

Our employees will have the authority, knowledge, skills, systems of work and equipment to always work safely

- Our offices will be both healthy and safe places to work
- We will work closely with the Yards to make their worksites safe for our employees
- We will commit suitable and sufficient resources to health and safety and will promptly and fully follow up on health and safety issues

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• We will continually work to improve our safety performance and safety culture



PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 4 of 17

TITLE: HSE MANUAL

1.7 OUR MANAGERS WILL:

- Understand the hazards and risks that their personnel are likely to be exposed to in their work.
- Act as role models and proactively demonstrate safety leadership and understand health and safety rules and systems.
- Support employees in resolving health and safety issues and concerns and are accountable for taking prompt and appropriate action.
- Make adequate resources available for their employees to attend safety training and to work safely.

1.8 OUR EMPLOYEES WILL:

- Comply with health and safety rules, procedures and legislation and make every effort to keep yourself and others safe.
- Refuse to undertake work that will compromise your health and safety.
- Carry out work assessment to keep yourself and those around you safe and reassess the situation if changes that can impact your health and safety occur.
- Mitigate and report Unsafe acts /behaviors and near misses observed in yard
- Stop unsafe / hazardous work that may result in incident.

2.0 DEFINITIONS AND ABBREVIATIONS

Fatality:

A death directly resulting from a work related: injury, trauma or condition regardless of the length of time between the incident and death.

Lost Time Injury (LTI):

A work-related injury, trauma or condition, which results in an individual being unable to carry out any of his duties or to return to work within 24 hours following the injury.

Restricted Work Case (RWC):

Injury which results in an individual being unable to perform all normally assigned work functions during a scheduled work shift or being assigned to another job on a temporary or permanent basis on the day following the injury.

Medical Treatment Case (MTC):

This is any work-related loss of consciousness or injury requiring more than first aid treatment by a physician, dentist, surgeon or registered medical person.

First Aid Case (FAC):

Work related injury that is not sufficiently serious to be reported as MTC or higher but requires minor first aid treatment.

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PREPARED BY:	APPROVED BY:	
LXW	JKL	
ISSUE DATE:	DOCUMENT NO:	
05-12-2016	SMP-M-QR03	
REVISION NO:	PAGE:	
6	Page 5 of 17	

TITLE: HSE MANUAL

Near Miss:

An Undesired event or sequence of events (and/or conditions) which under slightly different circumstances could have caused harm to personnel, environment, property, security or company reputation. (It refers to a situation where control was lost, "energy release" but no harm occurred).

Personal Protective Equipment (PPE):

Equipment and clothing, which affords protection against one or more risks to health and safety, this includes protection against adverse weather conditions.

Incident / Accident:

An unplanned event or chain of events which has (or could have) caused injury, fatality, illness, loss and/or damage to property, environment, third party or company reputation.

SMP:

Star MarinePro Corp. Limited and affiliated companies.

Personnel on Board system (POB):

System implemented to determine number of personnel on board vessel in dock or alongside quay, to ensure full and complete evacuation in case of emergencies. This can be a manual or automated system.

HSE:

Heath, Safety and Environment

Shipyard (yard) / Main Scope contractor:

Facility / location contracted to construct and deliver vessels / ships to owner.

3.0 STAR MARINEPRO HSE MANAGEMENT

3.1 RESPONSIBILITIES

Health, Safety and Environmental (HSE) concerns is a line responsibility making all SMP employees responsible and accountable for the HSE management.

It is required that the SMP Management, upon request, can obtain a record of all yard's, (including SMP Site Personnel), safety violations, near misses, Accidents & Incidents (Fatalities, LTI, MTC, & FAC, as well as health related issues) and provide this information to SMP management. SMP Management should be notified in case of Health, Safety or Environmental incident.

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PREPARED BY:	APPROVED BY:	
LXW	JKL	
ISSUE DATE:	DOCUMENT NO:	
05-12-2016	SMP-M-QR03	
REVISION NO:	PAGE:	
6	Page 6 of 17	

TITLE: HSE MANUAL

3.1.1 THE SMP TECHNICAL DIRECTOR OR REPRESENTATIVE

The SMP Technical Director or representative is operationally responsible for the HSE performance for activities related to all aspects of construction supervision activities.

The SMP Technical Director or representative is responsible for ensuring that this procedure is fully implemented and should on behalf of the SMP Management monitor the compliancy by:

- Ensuring that the SMP HSE compliance is in line with the SMP HSE Policy.
- Ensuring clear communication regarding the goals and objectives of the health and safety program.
- Keeping statistics on incidents occurring in SMP site operations.
- Follow-up on incidents occurring in construction supervision activities as applicable.
- Supporting and advising the organisation in the execution of HSE issues.
- Developing relevant training courses.

3.1.2 THE SITE MANAGER

The site manager is responsible to the SMP Technical Director or representative that the guidelines of this procedure are complied with and adhered to at the site office.

The responsibilities include:

- Ensure that the Yard HSE procedures, policies and plans are understood by all SMP employees and to interact with Yard HSE Management on the development of such plans.
- Health, Safety and environmental performance and awareness of SMP employees.
- Employees receive appropriate safety training to develop the competence level necessary for the satisfactory execution of their duties and responsibilities.
- Reporting, investigation and follow-up on incidents sustained by members of the site team.
- Reporting on Health, safety and environmental incidents occurring on the yard premises.
- Reporting on any bacterial or viral infection sustained by any person on site or at yard.
- Recommend potential improvements to this procedure.
- Implementation and follow-up of builder's performance of the Health and safety program.
- Perform regular weekly safety and environmental area inspection together with builder. Request safety or environmental audits if such are needed.
- Interface with the builder's HSE department and builder's appointed HSE manager to promote a safer working environment for all.
- The Site Manager must arrange for a regular meeting, with yard where HSE information received from the Yard HSE Management can be disseminated and where Site Team Members can bring forward HSE issues. Minutes of meetings of these meeting to be prepared and kept by the site office.
- The site team manager must ensure that site team members including visitor and crew are given an HSE induction at arrival at yard, the induction should a minimum include:

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Star MarinePro MANAGEMENT SYSTEM

PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 7 of 17

TITLE: HSE MANUAL

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1	Security requirements	- Access restrictions
		- Access ID
	7 1 1: (0: 1::	- Photography
2	Induction / Orientation	- Yard Safety Inductions
	requirements	- Other Inductions
		- Legal requirements
3	Emergency Plans	<u>General</u>
		Emergency Contact / reporting nos.
		- Yard Emergency services
		- Local Hospitals
		Site Office
		 Alarms points / alarm signals
		 Firefighting equipment available
		 Evacuation and muster points.
		Dry Dock / Slipway / Vessel
		 Evacuation plan including Muster points.
4	HSE Person in Charge	 Contact and focal point for all HSE related
		matters.
		- HSE Organisation
5	HSE Management procedures	- Yard Procedures
		- SMP internal procedures
6	Work on site	- PPE requirements
		 Transport and traffic in yard
		 Hazard and controls
7	Risks to health	 Local or global risks including viral /
		bacteriological infections
		 Health risks at yard (chemical or others)
		It is vital to ensure all site team members have a
		high awareness of these risks. In order to ensure
		this an instruction of viral infections must be given
		to site team members, to include:
		- Viral infections in general
		_
		 Specific current viral infections
		- Symptoms,
		- Controls, PPE.
		- Local legislation and procedures

3.1.3 THE SUPERINTENDENT

The HSE representative is responsible to the Site Manager that this HSE manual is followed. The responsibilities include:

- Reporting all incidents to the Site Manager sustained by members of the site team.
- Request training courses if such are needed.
- Recommend potential improvements to the HSE Manual.
- Implementation and follow-up of builder's performance of the safety and environmental program.
- Interface with builder's appointed project manager to promote a safer working environment for all.

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PREPARED BY:	APPROVED BY:
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ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 8 of 17

Email:

Web:

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TITLE: HSE MANUAL

Irrespective of the procedures in yards and the builders Permit to Work System, each superintendent must prior to engaging in inspections carry out a work assessment and evaluate potential safety and health hazards, regardless of yards HSE Management system, minimum expected controls should be as per below table:

Hazard / Risk	Description	Controls / Comments
Hazard / Risk 1. Working at Height	Working at height is (depending on Shipyard or country regulations) defined as work carried out at 1.8 to 2 meters or more above ground (or safe surface)	Controls / Comments Generally working at height should be avoided unless safe access and platforms are provided, safe platforms can be: Scaffolding: Scaffolding must be erected and properly inspected by certified (or approved) scaffolding team. It is preferably that yard has a scaffold tagging system to indicate safe access and platforms. Green Tag indicating "Safe for use" (date and time of inspection to be mentioned on card) Red Tag indicating "Unfit for use" When working on scaffold fall protection harness is optional, however if used the anchor point should be on structure independent from scaffolding structure. Mobile elevated working platform / Cherrypicker (MEWP): MEWP's should only be used if necessary and no other option is available. Fall protection harness to be used when working from MEWP. Scaffolding and Mobile elevated working platform should always be evaluated to ensure it is suitable and safe to use. Fall protection harness must be kept in good condition and be inspected before every use using inspection checklist in Appendix A as guideline. If any suspected deviancies are observed the harness is not to be used, the observations could include but not be limited to: cuts, loose threads, damaged buckles, chemical or paints on harness.
2. Falling objects	Falling objects can be either stationary objects that are not secured	Safety helmets should always be worn; however, it only provides limited protection from falling objects.



PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 9 of 17

	properly that may fall when energy is applied, or Persons falling from height.	Shipyard must ensure that: Tools used at height are secured. Good housekeeping is kept on elevated surfaces and platforms Toe boards or equivalent are installed where required. Access to areas below scaffold and other areas where work at height is performed is controlled. SMP site members are expected to: report any potential falling objects to the shipyard. Respect barriers or access restriction where work at height is performed.
3. Lifting Operations	Lifting operations can be anything from small lifts with vessel cranes to large steel sections with shipyard cranes	Shipyard is expected to: Restrict access where lifting operations are ongoing. SMP site members must ensure never to pass under a suspended load and keep distance to cranes performing lifting operations
4. Work in confined spaces.	Confined spaces (CS) are area with limited access that is not designed for human occupancy. (Tanks, Voids) Work in confined spaces carries several hazards and risks, such as: Fire & Explosion. Oxygen deficiency. Hazardous or Toxic gasses and fumes. Slips, Trips and falls. Engulfment (water material). High Temperature, both in CS and radiant heat from adjacent areas.	When working in confined spaces shipyard is expected to: Apply a safe system of work (such as a permit to work) Control simultaneous work, i.e. Coating & hot work. Ensure adequate ventilation and lighting. Conduct gas testing of CS before work is commenced and periodically when work is ongoing. Apply a system that ensure number of persons in CS is known. Ensure good housekeeping in CS. Ensure correct mechanical isolation / lock out of valves etc. if required. Before entering Confined Spaces, SMP site team members are expected to: Report any uncontrolled work in Confined spaces Review yards PTW if such a system is applied. Check that proper lighting and ventilation is applied. Ensure correct mechanical isolation / lock out of valves etc. if required. Bring Flashlight Wear personal multiple gas detector. Attach tag or other ID to ensure their location is known.
5. Hot Work	Hot work includes, but is not limited to: Welding work	Shipyard is expected to: Control hot work by a safe system of work (such as PTW).



PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 10 of 17

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	Flame cutting Grinding. Resulting hazards from this type of work may not be directly linked to the "hot work" but to other hazards being present also; Gas leaks from Welding equipment Oxygen rich atmosphere Simultaneous coating works. Protection of flammable material in surrounding areas. Burns injuries	Ensure that other "conflicting work" in area is controlled or stopped. Control access to areas where hot work is conducted. Use fire blankets or other fire inhibiting material to protect flammable material. Use fire watchman to control surrounding areas during hot work. SMP Site team is expected to: Review PTW and checklist if such a system is implemented. Respect barriers and access restriction, when hot work is ongoing. Wear required PPE
6. Hazardous substances	Hazardous substances can emit from many sources but here mostly coating work is considered.	Shipyard is expected to: Control coating work by a safe system of work (PTW). Erect barriers and signs when coating work is conducted. Control Access where coating work is ongoing. Restrict access to coating storage areas and mixing areas. SMP site Team is expected to: Review PTW and checklist if such a system in implemented Respect barriers and signs. When coating work is ongoing.
7. Pressure testing	During pressure test and flushing, fluids or air under high pressure may escape from leaks etc. causing bodily harm	Shipyard is expected to: Control work by a safe system of work (PTW). Erect barriers and signs when pressure testing / flushing is ongoing. Control access to areas when work is ongoing. SMP Site team is expected to: Report if these jobs are conducted uncontrolled (i.e. if no access control or barriers are in place). Respect barriers and access control when work is ongoing.
8. Ambient conditions	Ambient conditions include Adequate ventilation.	Shipyard must ensure that ambient conditions are within acceptable levels.



PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 11 of 17

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	Adequate Lighting. Workable temperature. No specific numeric values can be attached to these as ventilation and lighting is depending on if specific tasks are conducted or areas are only used for passage. Workable temperature may also depend on location, job and the clothes / PPE worn.	SMP Site team is expected to: Report if ambient condition is deemed inadequate. Not enter or work in an area where the ambient conditions are deemed inadequate.
9. Electrical	When work in electrical system are ongoing with open cabinets etc. Risk of electrocution exists.	Shipyard is expected to: Control work by a safe system of work (PTW). Erect barriers and signs when Electrical work is ongoing. Control access to areas when work is ongoing. Apply a mechanical isolation (Lock out / Tag out) system where electrical work is conducted. SMP Site team is expected to: Report if work on electrical work on live systems is conducted uncontrolled, or access control or mechanical isolation has not been carried out. Respect barriers and access control when work is ongoing.
10. Mechanical	Mechanical hazard often from machinery and mostly are moving	Shipyard is expected to Control access to areas when work is ongoing. Install barricades / barriers and warning signs when work is conducted.



PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 12 of 17

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11. Housekeeping	hazards from rotating, pushing lifting etc. The resulting risks are many but can mostly be described as Being Struck by, Entanglement Crushing, burns and cuts. During normal operation, most of the risks are being controlled, by mechanical isolation enclosures etc., however, under maintenance or in a shipyard environment this is not often the case. Poor Housekeeping is the root cause of many accidents, both resulting in personal injuries and material damage. Slips, Trips and falls often occur as a result of poor housekeeping, this could include: Cables / hoses in walkways Material and debris in work area or walkways. Oil or water on floors and decks Poor housekeeping can also be failure to remove garbage and packing material as well as hazardous or flammable substances, which can result in Fires, or health risks.	Ensure mechanical isolation when maintenance / repair or installation work is ongoing. SMP Site team is expected to: Report if work is conducted uncontrolled, or access control or mechanical isolation has not been carried out. Respect barriers and access control when work is ongoing. Shipyard is expected to: Keep good housekeeping always, including removal of garbage and other material no longer in use. SMP site Team is expected to: Report poor housekeeping and assist in keeping areas clean and free from debris or material that can be considered hazardous.
12. Traffic	A large number of vehicles ranging from Trucks, cars and busses to Motorcycles and	Shipyard / Contractors are expected to: Ensure proper separation between motorised heavy traffic and pedestrians / bicycles.



PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 13 of 17

TITLE: HSE MANUAL

bicycles, are used to commute and from shipyards and subcontractors, as well as being used for transport within the yards. In addition, heavy vehicles used for construction, such as Transporters, mobile cranes and Cherry pickers are frequently used. Proper traffic procedures and control is needed to ensure safety of pedestrians and bicyclists.

Site team members will use Motorised vehicles as well as bicycles both inside yards and for commuting to and from yard and contractors. Depending on the area as well as the experience of drivers this presents different hazards that may result in severe injuries or even fatalities.

Proper marking of driveways, walkways, pedestrian crosswalks.

Implement restrictions and speed limits. Whether means of transport are provided by shipyard, SMP or agent SMP Site team members must,

As passengers in busses or cars:

Ensure that vehicle is in safe driving condition.

Use seat belt while driving.

Monitor that drivers are observing traffic rules, incl.

keeping to the speed limits.

Vehicle deficiencies or driver's failure to adhere to the rules must be reported to the site Manager.

When driving cars / buses:

Use Seatbelt at all times.

Observe traffic rules including speed limits.

Practise defensive driving.

Any use of mobile phones during drive is not allowed.

When driving motorcycles / electric bicycles: Ensure that vehicle is in safe driving condition Use approved crash helmets at all times.

Observe traffic rules.

When driving Bicycles:

Ensure that the bicycle in safe working order. Use approved bicycle helmet at all times.

Observe Traffic rules

NOTE: Safety helmet can not to be used as a substitute for Crash helmet or bicycle helmet.

13 Local / Global threats to health (diseases / viruses)

Over the last decades, we have witnessed a rise in viral infections such as SARS, MERS, Avian Influenza, and most recently COVID-19, All of these have had the potential to develop into pandemics, though currently only COVID-19 has been classified as such.

In case of local or international outbreak of such viruses, information and instructions, must follow regulation and instructions from the local authorities.

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PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 14 of 17

TITLE: HSE MANUAL

14 Hearing protection	Hearing protection/environment noise safety would be covered inside HSE induction training	To be used in areas where the noise level exceeds in areas 85 dB (A) hearing protection shall be used. Monitor exposure limits exceed the established level (85 dB) by Noise meter.
15 Water Safety	All employees working over or near water (within 6 feet), where the danger of drowning exists, must wear the life jacket (personal floatation devices)	Generally, this is not required when working inside a platform protected with a standard guardrail system. At the job superintendent's discretion, work performed within a standard guardrail system may require the use of buoyant work vests. Work vests and life jackets must be inspected prior to and after each use.

3.2 INCIDENT REPORTING FOR SMP PERSONNEL

Fatalities involving SMP site team members must be reported to site manager and SMP Management immediately.

Serious incidents involving SMP site team members, crew and /or visitors (including LTI's and serious health incidents) must be reported to: site manager and SMP Management, LTI's must be reported within 6 hours.

4.0 SITE OFFICE

4.1 SITE OFFICE FACILITY SAFETY

When an office facility is first taken into use, the site manager must conduct a review and implement necessary actions that will ensure the safety of site team while working in the office spaces.

Offices are to have:

- 1. A suitable fire detection and alarm system
- 2. The appropriate number of escape and rescue equipment required for evacuation the facility.
- 3. A Drill and muster programme program proportional to the complexity of the escape facilities.
- 4. A minimum of two escape routed to the designated safe muster area.
- 5. An Inspection, maintenance and test programme appropriate for the equipment and installations.
- 6. Posted instructions that contain the following:
 - a. Fire alarm, signal and fire instructions
 - b. Plan showing escape routes and location of safety and first aid equipment.

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PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 15 of 17

TITLE: HSE MANUAL

4.2 RESPONSIBILITIES

All members of the site team are responsible and accountable for HSE management at their level within the organisation.

In case a non-conformance is detected, or a situation is considered to be of a serious and highrisk nature, Site team members are expected to stop any work activity, this may include but is not limited to the following:

- Risk of an incident is imminent.
- Work is in breach of shipyard safety rules.
- Necessary barriers, barricades and /or safety guardrails are not erected.
- Elevated levels of toxic and combustible gasses as well as high or low levels of oxygen is detected.

Inspections should normally only be carried out within the builder's working hours. Inspections outside normal working hours may be conducted as and when required by the site manager and after suitable work assessment.

4.3 SITE OFFICE PROCEDURES

4.3.1 SAFETY TRAINING

Minimum required training must be: SMP or Yard HSE introduction Keep records of each training.

4.3.2 PERSONNEL ON BOARD SYSTEM (POB)

A Personnel on board (POB) system must be implemented for hull in drydock / on slipway and vessels under outfitting at quayside. It is preferable to use a joint system with the shipyard, covering all personnel working on board. If a joint system cannot be agreed upon, the site manager must arrange for a system covering site team personnel, including crew, visitors and 3rd party service engineers.

4.4.3 PERSONAL PROTECTIVE EQUIPMENT (PPE)

All employees will be provided with appropriate personal protective equipment necessary to perform their work and mitigate residual risks.

The wearing of the appropriate PPE is a highly visible display of commitment to safety and personal awareness of risk.

The PPE procedure can be found in Appendix A.

Other specific protective clothing may be necessary when doing special jobs or operations or if required by shipyard.

4.4.4 SMOKING

Smoking is not allowed inside the office, site office or onboard the vessel or other work location and will be enforced by the Site Manager. Additionally, the shipyard's regulations must be followed.

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PREPARED BY:	APPROVED BY:
LXW	JKL
ISSUE DATE:	DOCUMENT NO:
05-12-2016	SMP-M-QR03
REVISION NO:	PAGE:
6	Page 16 of 17

Email:

Web:

info@star-marinepro.com

www.star-marinepro.com

TITLE: HSE MANUAL

4.4.5 ALCOHOL & DRUGS

SMP is committed to providing a safe place of employment that is not under influence of drugs and any alcohol. Employees of SMP are prohibited from engaging in the unlawful manufacture, distribution, dispensation, possession or use of controlled substances on facility premises. Additionally, the consumption of alcohol during working hours is prohibited, as is reporting to work already under the influence. Anyone who violates this policy will face disciplinary action including discharge.

SMP personnel taking medicine or drugs prescribed by a qualified medical practitioner should make this fact known to their respective manager and a common-sense agreement jointly made as to the individual's daily working programme.



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6	Page 17 of 17		

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TITLE: HSE MANUAL

Appendix A- Personal Protective Equipment (PPE)

Coverall or Jacket with trousers.	Must be good quality and made of flame-
	retardant material
Safety Shoes or Boots	Stainless steel insole
	Give a good grip
	Keep the feet warm and dry
	Provide good cushioning
	Be comfortable
Safety Helmet	With CE mark or equivalent approval and fitted
	with Chinstrap
Safety glasses or goggles	To be of good quality according to application
Safety gloves	To be of good quality according to application
Dust / filter masks	To be of good quality according to application
Flash light	No special requirement
The Hearing protection can be in the	Hearing protection must manufactured in
form of:	accordance with EN 352, or equivalent
 Ear Muffs (attached to Helmet) 	standard applicable to the operating area.
Disposable earplugs	
Fitted (Molded) Earplugs	
Life jacket (personal flotation devices)	To be of good quality according to application