



EXHIBIT D

HSEQ REQUIREMENTS

HSEQ Definitions

"COMPANY HSEQ POLICY" shall mean the latest revision of Sarir Oil Operations HSEQ policy statement, signed by the OMC Chairman of Sarir Oil Operations, which sets out the general principles which govern HSEQ management in the COMPANY.

"SOO HSEQ MANAGEMENT SYSTEM (SOO HSEQ MS)" shall mean the documented management system operated by Sarir Oil Operations to achieve the principles defined in the HSEQ POLICY, through a set of management standards and expectations, supported by written procedures and guidance.

"HSEQ PLAN" or **"HSEQ PROGRAMME"**, these terms are interchangeable and shall mean a description of how the HSEQ OBJECTIVES and TARGETS will be achieved over time. The HSEQ Programme shall list objectives and targets, person(s) responsible for carrying out the actions and target dates for completing the actions.

"HSEQ OBJECTIVE" shall mean a statement describing the situation (with regard to HSEQ) which the COMPANY or CATERER wants to achieve at a time in the future (normally at the end of the Programme period). It has the same general meaning as a HSEQ "goal" or "what is wanted".

"HSEQ TARGET" shall mean a description of the HSEQ OBJECTIVE (or part of the objective) expressed in a quantity that can be measured and monitored.

"INTERFACE DOCUMENT" or **"BRIDGING DOCUMENT"** shall mean a written document which defines how two or more safety management systems co-exist to allow co-operation and co-ordination on matters of health, safety, and environmental protection between different parties (usually the COMPANY and the CATERER). Such a document cross-references the detailed procedures which will be used and defines the responsibilities, accountabilities, and work activities of the various parties.

"HAZARD" shall mean the potential for harm (hazards may arise from substances, machinery, methods of work and other aspects of work organization, including lack of planning and inadequate safety management).

"HARMFUL ENERGY SOURCES" shall include, but not be limited to, harmful levels of noise, vibration, electro-magnetic and ionizing radiation, extremes of temperature, moving objects and machinery.

"RISK" shall mean the probability (or likelihood) of harm actually occurring and the severity of its outcome.



1. General HSEQ Requirements

- 1.1 HSEQ Policy and standards: CATERER is expected to fully support COMPANY's HSEQ policy and the standards and expectations of its HSEQ Management System. COMPANY reserves the right to review and approve CATERER's HSEQ policies and procedures. CATERER's HSEQ standards must, as a minimum, comply with COMPANY policies, laws and regulations of the State of Libya., and accepted good industry practice of the catering industry.
- 1.2 Unacceptable standards: If, in the opinion of the COMPANY, the CATERER's HSEQ policies and standards do not meet the required level, notice in writing will be given to the CATERER. A plan and time scale to correct any deficiencies will be agreed between COMPANY and CATERER.
- 1.3 HSEQ Plan: The CATERER will be required to develop and submit to the COMPANY for approval a HSEQ Programme which:
 - (i) Identifies the hazards and risks associated with the CATERER's work at the work site
 - (ii) Defines the methods for controlling these hazards and risks.

Should CATERER's HSEQ Programme not be approved, COMPANY shall state in writing the reasons for rejection and CATERER shall revise the HSEQ Programme and resubmit it for approval.
- 1.4 Responsibility for safe working: Notwithstanding any regulatory requirements in force at the work site, CATERER has the responsibility for the health and safety of it's own employees.
- 1.5 Interface with the SOO HSEQ Management System: Where HSEQ responsibilities and accountabilities are not clearly defined, or where there is a conflict between the HSEQ policies and standards of COMPANY and CATERER, the arrangements will be agreed and documented in an HSEQ Management System interface document. The interface document shall form part of the contract between COMPANY and CATERER.
- 1.6 Incident Notification and Reporting: CATERER will immediately notify COMPANY of all HSEQ incidents, including serious near-miss incidents, occurring during the Services. CATERER will provide COMPANY with copies of incident reports within 24 hours of the occurrence. All CATERER serious incidents shall be investigated by the CATERER, but COMPANY reserves the right to make its own investigation and recommendations for corrective action. CATERER will make any statutory reports of incidents involving CATERER personnel, such reports must be copied to the COMPANY. COMPANY will make any other statutory reports required following an incident.



- 1.7 Communication with third parties: With regard to incidents or HSEQ performance, CATERER will not make any report, verbal or written, to non-statutory bodies, organizations. or third parties without the prior written permission of the COMPANY.
- 1.8 Use of sub-Caterers: Should CATERER engage any sub-Caterer to perform work at the work site, CATERER represents and warrants that the sub-Caterer has complied or shall comply with all the HSEQ requirements. The use of sub-Caterers has to be agreed with COMPANY in writing. An intended use of sub-Caterers is to be part of the proposal documents. It is CATERER'S responsibility to ensure that Sub-Caterers meet all HSEQ requirements.
- 1.9 Access and information: COMPANY shall have the right, given reasonable notice and at reasonable times, to conduct HSEQ audits and inspections of the CATERER's work site, premises, personnel and HSEQ documentation.

2. General HSEQ Requirements relating to Personnel

- 2.1 HSEQ training: CATERER will be responsible for ensuring its employees are suitably trained. CATERER must ensure that all its employees are sufficiently competent to undertake their specific job function with due regard to HSEQ and are aware of the hazards, risks, and risk control measures. CATERER warrants that trainee personnel will not work unsupervised at COMPANY work sites.
- 2.2 Unauthorized access: CATERER shall take all reasonable precautions to prevent unauthorized access of persons to work sites or facilities which fall under restricted access regulations (such as hygiene areas, food storage, etc.). CATERER personnel will be subject to any security arrangements put in place by COMPANY.
- 2.3 Drug and alcohol policy: CATERER will comply with COMPANY drug and alcohol policy put in place at the work site.
- 2.4 Personal work clothing and safety equipment: CATERER is to insure all its employees have and use the work clothing and safety equipment which is appropriate to the hazards and risks at the work site and will ensure proper account of hygiene precautions to be taken. Work clothing and safety equipment must be of a standard accepted by COMPANY, generally in compliance with ANSI, OSHA or CE standards.
- 2.5 Emergency procedures: CATERER will comply with all emergency procedures relating to the work site. CATERER will be responsible for ensuring all its employees are informed of the relevant emergency procedures and participate in exercises and training, as required.



3. General HSEQ Requirements relating to materials, equipment, and the work site

- 3.1 Hazardous Chemicals and Materials: CATERER shall be responsible for making all reports, notifications and gaining the relevant approvals required by law to appropriate government agencies regarding the identity, composition, and amount of hazardous chemicals, substances, and/or materials, if any, used or brought by CATERER to the work site. CATERER shall supply to the COMPANY a copy of the relevant Material Safety Data Sheet (MSDS) for all hazardous chemicals before transportation to the work site. CATERER shall comply with all COMPANY procedures and standards with regard to chemical use, storage, transportation and disposal.
- 3.2 Equipment and Supplies: CATERER shall be responsible for ensuring that any equipment or supplies (machines, tools, etc.) brought to / used at the work site by it is subject to regular safety / hygiene check and inspection, testing and maintenance, and that such equipment or supplies are free from defects and are fit for their intended use. Generally, all such equipment shall provide European CE certification, or comparable safety certificate. CATERER is responsible to maintain all equipment in a safe and hygienic state of repair, according to Manufacturer instructions, legal regulations, and catering industry practice standards.
- 3.3 Hygiene and Housekeeping: CATERER's work site and activities must be planned and maintained in a way to afford safe and hygienic working with due regard to good catering industry standards. Work sites / places shall be clean and tidy with appropriate safe storage of material and equipment and the collection and disposal of waste materials by methods dictated by catering industry standards and approved by the COMPANY.
- 3.4 Work site access and egress: CATERER shall ensure that its work sites are provided with safe means of personnel access and egress at all times and are kept free of obstructions.
- 3.5 Work site environment: CATERER shall ensure that personnel at its work sites are provided with adequate protection from falling from height, being struck by falling objects, coming into contact with harmful energy sources and that work sites have suitable illumination, warning, and protection systems, as appropriate and as stated in task-risk-assessments or regulations.



4. Specific HSEQ Requirements for Catering Services

The following requirements to apply as long as these are not superseded by legal regulations or enhanced catering best practice standards.

- 4.1. General: Kitchens and catering premises in general should present no risk of illness resulting from their operations. CATERER has to apply food hygiene practices, precautions, and procedures to ensure:
 - protecting food from risk of contamination of any kind
 - preventing any organisms multiplying to an extent which would expose consumers to risk, or result in premature decomposition of food
 - destroying any harmful biological organisms (viruses, certain yeasts, spores, moulds, etc.) in food by thorough cooking or processing.
- 4.2. Food Purchasing: Food for use in Company catering facilities should only be purchased from reliable sources. Purchase of food shall be under the command of an adequately qualified person, preferably the designated kitchen chef. Auditing of food suppliers and transport companies premises is recommended prior to entering into contracts. This should cover production, processing, storage, and subsequent transport of the products to the catering facility, to ensure satisfactory standards of hygiene. Food from the market should only be purchased by an adequately competent food handler, preferably the local kitchen chef or his assistant.
- 4.3. Medical examination of Catering Staff: Catering staff should undergo a special medical examination (by a physician) before initially commencing work and fulfil the necessary health requirements. The content of examination is to fulfil legal regulations, but should include as a minimum:
 - brief physical examination
 - taking of a medical history
 - examination for evidence of blood borne pathogens such as HIV, Hepatitis (including collection and testing of a blood specimen) examination for throat infections (including taking of a throat swab for isolation of streptococci)
 - examination for evidence of tuberculosis (including taking e.g., an x-ray)
 - examination for stomach disorders (including collection and examination of a stool specimen for parasites, salmonellae, shigellae and other micro-organisms)
 - examination for contagious diseases
 - examination for skin conditions and wounds



Subsequent routine medical examinations are required to be conducted as a minimum once in a half year, or more often if legal regulations require so. Further examination should be conducted in the case of food handlers reporting sick or in the investigation of outbreaks of food-borne disease.

- 4.4. Training and education of food handlers: Catering staff shall receive comprehensive training in the aspects of hygiene (and safety) related to their work. Managers and supervisors with direct responsibility for catering services should be fully conversant with:

- the purchase of satisfactory raw materials design of or alteration to catering facilities
- purchase and installation of appropriate equipment
- training of catering staff
- all aspects of food storage and preparation, pest control, cleaning and sanitizing of catering facilities and equipment
- hygiene inspections/ observations
- safety inspections / observations
- hazard analysis critical control points.

All catering assistants / food handlers (kitchen staff, cleaning personnel) should undergo basic induction and refresher training in food hygiene and accident prevention and receive specific training related to their job(s). Basic training should focus on (as applicable):

- personal health and hygiene (personal cleanliness, hand washing, use of amenities, use of work clothing and PPE, reporting of illness and injuries)
- safe handling of food practices
- stock rotation systems
- correct food storage and preparation (avoidance of cross contamination, refrigeration, freezing, cold storing, cooking practices, cleanliness, etc.)
- washing up and cleaning procedures / techniques and programmes
- safe working practices (including use and cleaning of dangerous equipment such as knives, axes, electric food mixers, slicers, cutting machines, mincing machines, etc.)
- pest control
- first aid (treatment of wounds, seeking for the doctor)
- firefighting (including operation of automatic fire fighting system, portable fire extinguishers and fire blankets; Note: water must not be used to extinguish a fat fire, the fire is best extinguished by covering it with a fire blanket).



CATERER shall submit to COMPANY the First Aid Training certificates. Refresher training is to be given every two years.

CATERER shall ensure that always, as a minimum, 2 kitchen staff members and 2 cleaning staff members for each Area of Service (i.e., Concession 96 and Concession C97 sites / facilities) in each shift are in possession of a valid First Aid Certificate.

COMPANY will invite a number of CATERER staff to participate in basic fire awareness and firefighting training (use of fire extinguishers, fire blankets, etc.) on an annual basis. Participation of CATERER staff is mandatory. The training is free of charge.

Furthermore, COMPANY will invite all CATERER staff to undergo the annual Safety Induction training upon arrival in the Concession. Participation of CATERER staff is mandatory. The training is free of charge.

- 4.5. Work clothing and personal protective equipment: Kitchen staff have to wear adequate and clean clothing. Food handlers / kitchen staff should preferably be provided with uniforms. People with longer hair have to keep it in a net or under a suitable hat/ cap while near food or preparation areas (cook's caps and hairnets). Disposable gloves should always be readily available for catering staff. The kitchen staff shall report for duty in clean clothes.
- 4.6. General Duties of Food Handlers / Kitchen Staff: All persons involved in catering operations have to maintain a high standard of personal and communal hygiene at all times and be aware of the danger of diseases spreading due to contaminated food. Personal and communal hygiene should include the following:
- to appear to work in a clean condition with clean clothes and to keep fingernails short
 - to wash hands prior to the handling of food, after handling uncooked food, or after using the toilet
 - to wear / use appropriate clean work clothing, PPE and disposable gloves as dictated
 - to report immediately to the responsible supervisor, manager or doctor when not being free of contagious diseases, cuts, sores, and colds and not to start work without approval from the doctor
 - to clean cuts and abrasions at once and give First Aid treatment, and to take care that blood will not come in contact with any food.



- 4.7. **Monitoring of Operations:** One of the most important functions of catering management is to monitor operations to ensure that standards are adhered to and that any necessary remedial action is taken. Regular hygiene inspections of food premises should be carried out by trained personnel and should be formally recorded. Kitchen staff should be checked often to make sure they practice good personal hygiene
- 4.8. **COMPANY HSEQ Procedures:** CATERER staff has to comply with COMPANY HSEQ procedures and rules at all times both in the premises and when driving in Concession Areas. These COMPANY HSEQ procedures rules are made available on COMPANY'S INTRANET or any other accessible source. COMPANY will forward to CATERER prints and/or electronic versions of those COMPANY HSEQ procedures and rules CATERER staff must be aware of. Safety signs as posted in COMPANY premises / facilities are considered safety rules too and must be strictly followed.
- 4.9. **Vehicle Driving:** CATERER staff has to follow COMPANY safety rules and procedures regarding vehicle driving. For all driving activities conducted by CATERER staff with CATERER staff and vehicles inside the Concessions and in between them, the speed limit is 80 km/hr. The wearing / use of seat belts by all occupants of a vehicle is mandatory. Journey Management and reporting in/out procedures must be correctly applied at all times. These rules apply equally to any SUBCATERER (if any), and CATERER has to ensure that SUBCATERERS establish and follow these safety rules and procedures.