

**ADDENDUM NO. 1 TO THE GUIDE TO SAFETY MANUAL APRIL 2020**  
**CONTRACTOR ENVIRONMENT, SAFETY, SECURITY & HEALTH REGULATIONS (24)**  
**VIOLATIONS AND DISCIPLINARY ACTIONS**

**1.0 PURPOSE**

This procedure classifies, investigates violations, and establishes uniform application of disciplinary action for environment, safety, security and health violations by Contractors, sub-contractors and consultants.

**2.0 SCOPE**

This Procedure applies to all contractors, sub-contractors and consultants who conduct work activities and services in all Bapco's Operating Areas. This also applies to those personnel employed by other agencies working for Bapco on secondment/assignment basis.

**3.0 DEFINITIONS**

**3.1 VIOLATIONS**

An unplanned or an unusual event, or a series of events and circumstances that resulted in, or had the potential to result in, an adverse or undesirable safety, process safety, health, fire and environmental consequence. Undesirable consequences related to HSE, incidents include, but are not limited to the following:

- Injuries/illnesses
- Significant environmental impact
- Unfavorable impact on the public
- Significant property damage
- Business interruption
- Damage to Reputation

**3.2 DISCIPLINARY ACTIONS**

Disciplinary action is a method of dealing with employees who cause problems or do not follow company rules and policies.

**3.3 NOMINATED REPRESENTATIVE/S**

This can be the Chairman Contractors Health, Environment, Safety Committee (CHESC), Security Department Representative or Procurement Department Representative or Contracts Owner Department Representative. The representative is to be nominated by the head of the Department.

### **3.4. INVESTIGATION COMMITTEE**

Is a Committee consists of members/representatives from contract Owner department and when required members/representatives from other Contract User department and a representative if required from Procurement department?

### **4.0 GENERAL REQUIREMENTS**

The Contractors, sub-contractors and consultants always must comply with the following requirements;

- 1) Maintain full responsibility and liability for all environmental, safety, security and health compliance matters.
- 2) Each contractor, sub-contractor or consultant shall take prompt action on safety concerns as expressed and required by Bapco's Safety Procedures, Rules and Regulations. ***These additional safety policies and procedures are intended to assist contractors, sub- contractors or consultants in preventing or reducing the possibility of accidents and establishing minimum Environment, Health and Safety standards to protect the Bapco.***
- 3) Each contractor, sub-contractor and consultant is responsible for correcting environmental, safety, security and health violations and/or unsafe conditions present in his/her operation.
- 4) Contractors, sub-contractors and consultants Site/Safety Managers, Safety Officers, Supervisors, and workers must ensure that all work activities and/or services are always carried out safely to prevent injuries and damage to properties.
- 5) A contractor's safety record at the Bapco will be a criterion used to judge performance and determine whether or not a contractor sub-contractor and consultant qualify for future contracts at Bapco.
- 6) Contractors, sub-contractors and consultants and their employees shall utilize 'Stop Work Authority' issued to them responsibly and assist BAPCO in ensuring the safety and protection of personnel, plant and equipment at all times.

## **5.0 RESPONSIBILITIES**

### **5.1 Contractor Supervisor Responsibility (Safety Officer, Site Safety Manager, Workers)**

Each supervisor in addition to the General Requirements hereto must be responsible for but not limited to the following.

1. Keeps a constant check on the approved methods of working to prevent environment, safety, security and health violations.
2. Supports and if required exercises Stop Work Authority as necessary.
3. Promotes Contractors/ Consultant employee accountability for environment, safety, security and health practices and regulations in accordance with the Bapco's procedures.
4. Initiates immediate corrective actions towards unsafe acts or safety conditions so as to prevent or mitigate future recurrence.
5. Consistently enforces good environment, safety, security and health practices and regulations at all times.
6. Ensures employees are made aware, constantly reminded of this procedure and appreciates the consequences for not adhering to it.
7. Takes the following actions when a serious environment, safety, security and health situation or safety violation is observed:
  - Immediately stop the activity
  - Initiates an investigation
  - Initiates corrective action if appropriate
  - Notifies the concerned Bapco work/project supervisor responsible when corrective action is required
  - Documenting violations must be assessed and processed in accordance with Appendix 1 of this procedure.

8. Conducts an immediate initial investigation when the contractor is observed in violation of Environmental, Health, Safety, and Security Practices and Procedures.
9. If the incident is classified as serious, the contractor Supervisor may during the investigation either be suspended or the employee who committed the violation is temporarily removed from the workplace. (This is applicable if investigation is carried out by Bapco).
10. The contractor Supervisor must immediately communicate the violation to his Manager and arrange to conduct detailed and documented investigation.

#### 5.2 Manager Procurement

The disciplinary action taken by the user department must immediately be communicated with the concerned contractors, sub-contractors or consultants through the Procurement Department.

#### 5.3 Contract Owner/User

All above violations must be recorded by the Contract User and copies circulated to concerned Departments including Procurement, Contract Owner, HSE and Security Departments (for traffic violations only).

#### 5.4 Nominated Representative

The nominated representative will participate in contractor violations and in determining the level of violations.

#### 5.5 Investigation Committee

Investigates to determine the type and level of violation (i.e. Minor, Medium or Major) and ensures all required disciplinary actions are in place.

### **6.0 REFERENCES**

6.1 A Guide to Safety, 2017 Edition.

6.2 Contractor Safety Standard OEMS/SAFE/SWP/CONT/2 - August 2016

## **7.0 PROCEDURE**

### **7.1 Enforcement**

Violations observed must be reported immediately to the Contract by the person discovering the violation Owner/User. All violations shall be documented, and appropriate disciplinary actions must be taken. Appropriate disciplinary actions shall be taken against contractors, sub-contractors and consultants who refuse to comply with and/or violate safety and health practices, procedures, standards and requirements. Termination of the specific purchase agreement/contract or services with Bapco may subsequently be applied for serious violations as explained in Section 7.2.

The disciplinary process includes; oral or written disciplinary action and termination of purchase agreement/contract or services with Bapco.

### **7.2 Classification of Violations and Disciplinary Actions**

All violations observed or reported must be assessed, classified and disciplinary actions must be processed in accordance with this procedure and as outlined in Appendix 1 attached hereto.

The following describes the classifications of environment, safety, security and health violations and disciplinary actions;

#### **a) Serious Violation**

Means any Violation of Bapco's systems and/or procedures (e.g. Permit to work, excavation, Loss of containment, etc.) which could lead to high probability of causing death, serious physical harm, or major damage to equipment and/or property or environment.

#### **Disciplinary Action**

Contractors, sub-contractors and consultants who commit Serious Violations shall receive a written warning or an immediate termination of Bapco specific contract Appendix (2). If he commits another serious violation or a subsequent violation has occurred from the same contractor, sub-contractors or consultants, then all contracts with such contractor, sub-contractor or consultant may be terminated at no extra cost to the Bapco. Contractor, sub-contractor or consultant may then be removed from the Bapco's List of Approved Contractors for a minimum of 2 consecutive years till a detailed evaluation audit by a team consisting of at least three (3) BAPCO departmental representatives with interest in

utilizing the services of this Contractor/ Sub-contractor or Consultant which shall include representatives from Safety and Procurement Departments submits an acceptance report after detailed scrutiny of documents, procedures and practices of the agency under audit.

**b) Medium Violation**

Means any Violation of Bapco's systems and/or procedures (e.g. Permit to work, excavation, Loss of containment, etc.) by a contractor, sub-contractor or consultant which is of low probability in causing damage to Bapco property, bodily harm to personnel and the like.

**Disciplinary Action**

Contractors, sub-contractors or consultants who commit Medium Violations shall receive a formal written warning. If a similar violation is repeated within one year, all contracts with such contractor, sub-contractor or consultant may be terminated at no extra cost to the Bapco. Contractors, sub-contractors or consultants may then be removed from the Bapco's List of Approved Contractors for two consecutive years.

**c) Minor Violations**

Means any Violation of Bapco's systems and/or procedures (e.g. Permit to work, excavation, LOTO, etc.) by a contractor, sub-contractor or consultant which has very low or no probability is present in causing death, serious physical harm, or major equipment damage but can potentially have an adverse impact on Bapco operations.

**Disciplinary Action**

Minor violations do not warrant enforcement action but are recorded and must be corrected. Repeated minor violations numbering to five (5) incidents from the same Contractor/ Sub-contractor or Consultant or their employees in direct engagement or on secondment to BAPCO in a calendar year shall be classified as a medium violation and action shall proceed as explained under b) 'Medium Violation'.

**7.3 Other Employees Violations**

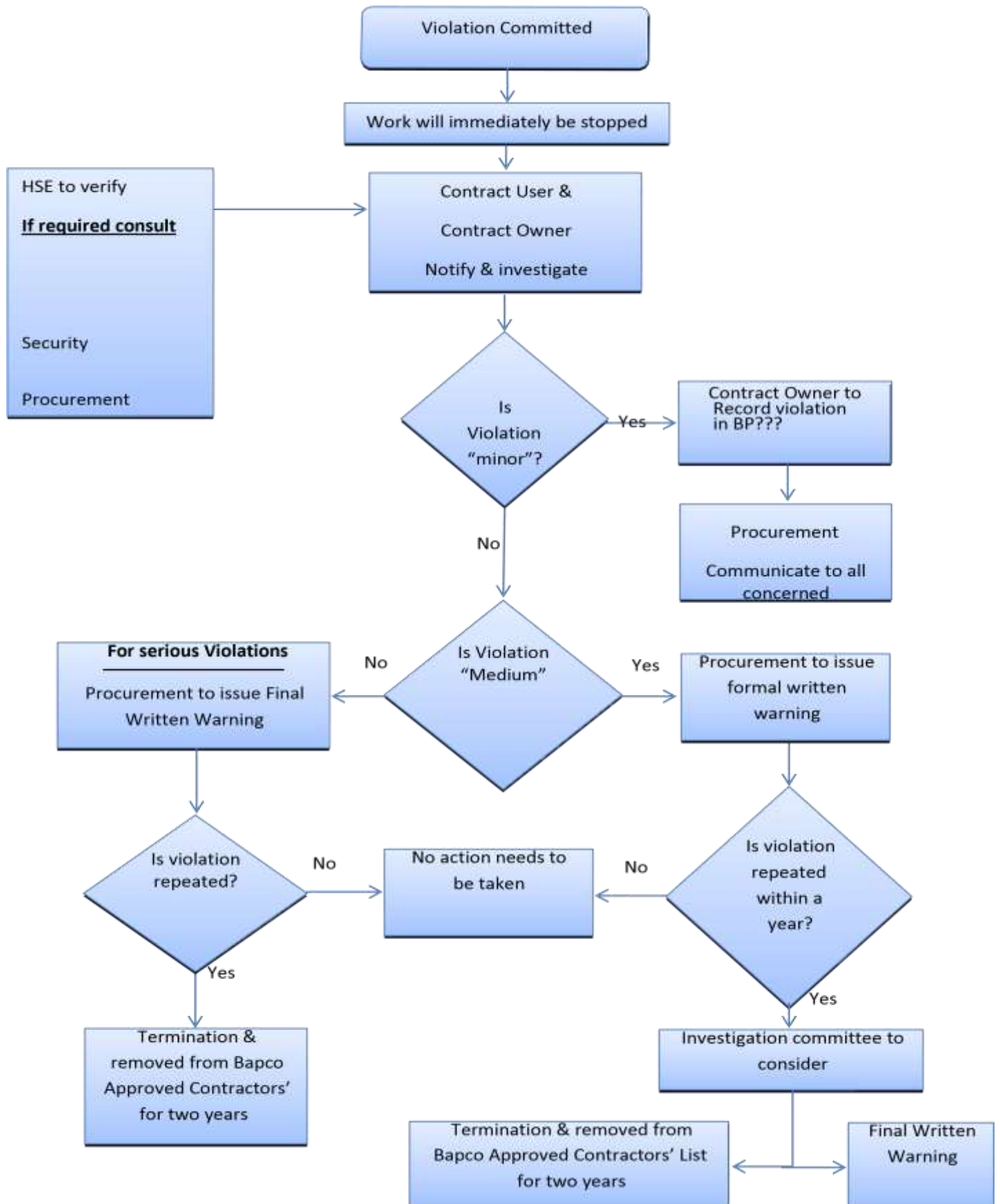
Contractors, sub-contractors or consultants' employees and representatives who work for Bapco under secondment/assignment etc. to BAPCO Line/ Staff Functions/ Department shall also be subjected to the same disciplinary action in line with Bapco's Code of Conduct.

### **Examples of violations**

Examples of safety violations shall include but not limited to the following:

- Working in an elevated position without the use of fall protection equipment, platforms.
- Working in an environment that may cause immediate danger to life and property.
- Conscious disregard to safety postings/signs.
- Using defective equipment/tools.
- Causing a large loss of containment due to lack of/ inadequate control measures.
- Performing work on energized electrical circuits or pressurized piping / mechanical equipment/ systems without proper review.
- Failure to use seat belts and safety protection when operating mobile equipment.  
Operating any equipment with an expired license/ BAPCO Test tag and/or registration.
- Working without approved Method Statements/ Rigging Studies when specifically required to do so as required by BAPCO Procedures/ systems and instructions.
- Using mobile phone while driving in Bapco operating areas.
- Driving beyond the speed limits in Bapco operating areas.

## Appendix 1: Violation vs. Disciplinary Action Process





## Appendix 2: Form of Violations



### BAHRAIN PETROLEUM COMPANY B.S.C. (c) SAFETY VIOLATION NOTICE

Contractor \_\_\_\_\_ Name: \_\_\_\_\_ Date of \_\_\_\_\_  
Notice: \_\_\_\_\_  
Location of Violation: \_\_\_\_\_  
Date of Incident: \_\_\_\_\_ Time: \_\_\_\_\_

Type and Description of Violation:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Previous Warning

Type of Offence	Oral	Written	Date	By Whom
1 <sup>st</sup> Warning	Y/N	Y/N		
2 <sup>nd</sup> Warning	Y/N	Y/N		

Contract Owner/User Comments

\_\_\_\_\_  
\_\_\_\_\_

Health, Safety & Environmental /Security Comments

\_\_\_\_\_  
\_\_\_\_\_

Description of Action to be taken

\_\_\_\_\_  
\_\_\_\_\_

Tick appropriate Box

Warning		Probation		Suspension		Dismissal	
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Submitted by Contract Owner /User: \_\_\_\_\_ Date: \_\_\_\_\_  
Agreed by HSE/Security: \_\_\_\_\_ Date: \_\_\_\_\_  
Agreed by Procurement: \_\_\_\_\_ Date: \_\_\_\_\_  
Approved by EHS Committee Chairman: \_\_\_\_\_ Date: \_\_\_\_\_

Original: Mgr. Procurement  
Contract Owner Dept.  
HSE Dept.  
Security Dept.