

Our Nine

Safety Rules to Live By



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1. Introduction

We continue to experience serious incidents in Mondi each year. We need to make clear the message that we do not accept these incidents as an inevitable consequence of working in a dangerous industry. We have to do things differently and continuously focus on safety to achieve zero fatalities and life altering injuries.

To do this we:

- · Have clear and consistent safety rules (Nine Safety Rules to Live By);
- Expect that everyone is trained and complies with these life-saving rules;
- Investigate each potential violation;
- · Hold people accountable (managers, supervisors, employees and contractors).

In 2002, the Six Golden Rules were developed and implemented in Mondi with the objective of highlighting and identifying required actions for persons working in high-risk situations. Reviews of previous fatalities and significant incidents had identified a number of potential material hazards.

The Golden Rules were revised in 2006 and published in 2007 as the Nine Safety Rules to Live By, establishing performance expectations for managing these material hazards in practice. Standard operating procedures (SOPs) and safe work procedures are only effective if everyone thinks and behaves safely at all times.

These Nine Safety Rules to Live By emphasised personal responsibility while defining safe behaviours related to critical tasks. The rules were based on the belief that safe behaviours are an essential risk control and must be in place every time a critical hazard is encountered. In combination with visible felt management commitment, the Nine Safety Rules to Live By were seen as an essential cornerstone for working together towards zero harm. They provided a set of expectations for how everyone must behave every time, in all associated tasks and activities.

In 2011, the Nine Safety Rules to Live By were updated to place increased emphasis on our caring approach and culture and on the principles of engagement and responsibility. The foundation of this approach is based on actively engaged and emotionally committed people who effectively support a safe working environment, safe work methods and practices and have an overall passion for working together towards achieving the common goal of zero harm.

We believe that safety is first and foremost about protecting our employees, contractors, communities and the environment in which they work and live. This is achieved by developing the desired safety culture to help achieve the ultimate goal of zero harm.

The 2014 revision includes additional requirements for some of the safety rules and has listed some of the responsibilities of the supervisors/persons in charge to ensure that the requirements of the safety rules are adhered to. The revision also encourages an interdependent culture.



2. Objective

The objective of the Nine Safety Rules to Live By (hereon after referred to as the safety rules) is to prevent harm to people working at or on behalf of Mondi.

They include information about:

- The nine fatal risk activities conducted at Mondi operations;
- A consistent set of rules and a culture of compliance; and
- Mandatory compliance for work-related activities.

These safety rules are applicable to:

- All operations under Mondi's operational and/or governance control;
- All activities conducted by Mondi employees, contractors and subcontractors; and
- Visitors to the operations who are exposed to issues related to the rules.

Front line managers shall communicate these rules and ensure understanding and compliance. Each reported non-compliance shall be investigated and disciplinary action shall be considered for a failure to comply depending on the severity of the non-compliance.





3. Resilience

Zero work-related injuries and illnesses have been a long-standing goal for Mondi. We believe that excellent safety performance is attainable through demonstrated visible felt leadership, engagement with employees and contractors as well as passionate effort and involvement by all. One of our guiding principles is that we value human life above all else and manage risks in our operations accordingly.

Mondi promotes an interdependent safety culture in which everybody who works for or on behalf of Mondi looks after their own safety as well as the safety of others. The Safety Rules to Live By provide the level of global focus and attention directed at preventing fatal and life-altering injuries, and are critical in the development of a safety system and desired safety culture.

These safety rules contribute to:

- · Developing and implementing effective operational controls that recognise risks and error-likely situations;
- Improving effectiveness of pre-task planning through toolbox tasks for high risk tasks;
- Assessing risk for fatal or life-altering consequences related to job/task and routine/non-routine activities;
- Adding to the layers of protection against recognised risks;
- · Stopping work when a risk is identified that cannot be eliminated, engineered out or controlled;
- Applying lessons learned to predict areas of current and future concern and vulnerability;
- Pre-testing newly designed safe working procedures or work methods;
- Improving the use of critical task observations in identifying potential deviations; and
- Addressing the safety of contractors and contracted services.

The Safety Rules shall be applied in conjunction with the SD Standards and Performance Requirements.

The safety rules are mandatory and are considered a condition of employment and shall be followed at all times. They must be embedded in the applicable SOPs/SWPs and shall cover at least, but not limited to:

- · Work with a valid permit when required.
- Respect speed limits, keep to travel paths, use seat belts and only use a mobile phone with hands-free equipment while driving.
- Obtain authorisation before entering a confined space and take the necessary precautions.
- · Protect yourself against falling when working at heights.
- Test isolation before work begins and use specified life-saving equipment.
- Obtain authorisation before overriding or disabling protective equipment.
- Do not stand or walk under a suspended load.
- Conduct a chemicals assessment and wear specified PPE when required.
- When working in the forests, keep a safe distance at all times.

The Safety Rules to Live By focus on life-saving decisions within the control of our employees, contractors and visitors. They seek to define these in simple-to-understand language.

Operations managers are expected to have appropriate sanctions in force for instances of non-compliance including, but not limited to, coaching, re-training, verbal reprimand, formal warning or dismissal.

These safety rules are not designed to cover every risk area or eventuality present in our operations.



4. Application

We do not accept fatalities or life-altering injuries as an inevitable consequence of working in our industry. Safety is a legitimate personal expectation. All Mondi employees and contractors should be able to return home at the end of their shift without having been injured or caused harm in any way. While the majority of persons work safely when conducting their respective tasks, life-saving rules (Nine Safety Rules to Live By) focus on high standards and levels of compliance.

The aim of briefing all people working at or on behalf of Mondi is to ensure an understanding of and compliance with the requirements. The continuous focus on implementing and adhering to these Safety Rules will assist in making the step change towards our zero harm objective.

To achieve this objective, it is important that all employees and contractors take personal responsibility in looking after their own safety and that of others by adhering to the rules and procedures at all times. In turn, the supervisors have a moral responsibility to ensure that the safety rules are explained and understood by their teams and are enforced and adhered to at all times.

The Nine Safety Rules to Live By form the mandatory minimum requirement for implementation. The mandatory character of these rules is signified by the use of the word "shall". However, there will be circumstances where local conditions will demonstrate that the rule is either not applicable or an alternative approach is necessary.

In these unique circumstances, where the specific requirement cannot be fully achieved, approval must be obtained from the business unit/business segment SHE manager and Group head of safety and health. An alternative comprehensive and documented risk-based control procedure or plan shall be formulated, containing:

- · Details of the safety rule performance gap;
- · Proposed alternative controls to be implemented;
- · Risk level of the risk with proposed controls;
- · Plan to achieve compliance, if applicable; and
- · Approval by the respective operations manager.

Operational Risk Management (SDMS PR 19.1) requires that work with an extreme risk should only be started or continued under strict management control.

Mondi operates in different countries and cultures around the world, with varying legal frameworks. Therefore when applying procedures or practices to meet the Nine Safety Rules to Live By, the relevant legislation must be complied with as a minimum standard. Translation and implementation should be tailored to address cultural and literacy issues applicable for each operation.





5. Our Nine Safety Rules



Permits-to-work and modifications

Work with a valid permit when required

Rule One

A work permit describes what you must do right every time to stay safe.

If you are a permit acceptor, you shall always:

- Ensure the work permit covers all the issues applicable to the work to be conducted;
- Understand the work permit and adhere to the precautionary measures listed;
- · Confirm the work permit has been issued and is valid prior to commencing with the work;
- Ensure that all persons in the team have been briefed and understand the contents of the work permit;
- · Confirm with the person in charge of the work that it is safe to start the work; and
- · Stop work when circumstances change.

If you are the permit issuer, you shall always:

- The risks involved and precautions have been evaluated together with the acceptor;
- Persons involved understand the hazards;
- Persons involved have adequately addressed the hazards;
- The impacts on other activities on the plant or site are fully determined;
- · Modifications have been authorised;
- · All affected persons have been informed before the work commences;
- Those signing the permit are aware of the implications of their signature;
- Ensure permit is completed correctly and includes all relevant information; and
- Conduct a joint visit to the work area with the acceptor of the permit.

If you are the supervisor or person in charge of the work, you shall always:

- Confirm that the requirements of the permit are in place;
- Confirm that the workplace has been inspected before work starts;
- · Confirm the work permit is signed;
- · Confirm that it is safe to start work; and
- Get a new work permit when the work or the situation changes.



Operating mobile equipment

Respect speed limits, keep to your travel paths, wear seat-belts and only use a phone with hands-free equipment while driving

Rule Two

Speeding, using a phone or getting off a travel path increases the risk of losing control of your vehicle. A seat belt protects you and your passengers from injury in the event of an accident.

If you are a driver, you shall always:

- · Keep your eye and focus on your travel path;
- Stay at or below the maximum allowable speed limit for the travel paths on which you are driving;
- · Adjust your speed to prevailing conditions;
- · Avoid using a mobile phone or similar device, if not hands-free;
- Avoid sending or reading text messages and/or e-mails while driving;
- · Confirm if a travel plan is required before starting the journey; and
- Follow the route specified in the travel plan and inform the supervisor or person in charge immediately if changes occur.

If you are a passenger, you shall always intervene if a driver is:

- · Using a mobile phone in a moving vehicle;
- Exceeding the maximum allowable speed; and/or
- · Failing to wear a seat belt.

If you are a driver, or passenger you shall always:

- Keep your seat belt properly fastened at all times while vehicle is in operation;
- Check that everyone in the vehicle is wearing a seat belt correctly before operating the vehicle; and
- · Intervene when fellow passengers are failing to wear their seat belts correctly.







Entering confined spaces

Obtain authorisation before entering a confined space and ensure you take the necessary precautions

Rule Three

A confined space such as boiler, tank, vessel or pipe can contain poisonous air, explosive gas or other hazards such as lack of oxygen, risk of falling objects or risk of falling. Authorised and controlled access keeps you safe.

Every time you enter a confined space, you shall:

- · Confirm with the person in charge of the work that the atmospheric tests have been conducted and it is safe to start the work;
- Confirm with the stand-by person that you may enter the confined space;
- · Follow the requirements of the work permit; and
- · Immediately exit the confined space if you do not feel well and report to the person in charge.

If you are a stand-by person, you shall always:

- · Approve and control access to a confined space;
- Have means of communication with the people inside the confined space;
- · Have emergency response arrangements for rescue of the people in the confined space; and
- Check that your communications and rescue equipment is in good working order.

If you are the supervisor or the person in charge of the work, you shall always confirm that:

- The requirements of the work permit are in place;
- A qualified stand-by person is always present when people are in a confined space;
- · Atmospheric testing is carried out as per the work permit; and that
- It is safe to start the work.

If you are the person responsible for testing the atmospheric conditions, you shall always:

- Understand which tests the work permit requires and how often; and
- · Use certified and calibrated equipment for the tests.





Working at heights

Protect yourself against falling when working at heights

Rule Four

Always use fall arrest equipment to keep you safe when working at heights over two metres. A protective environment includes approved scaffolds, stairs with handrails, barriers, mobile elevated work platforms, etc.

If you are working outside a protective environment where you can fall over two metres, you shall at all times:

- · Have an authorisation to conduct the work;
- Be medically fit to work at heights;
- · Be aware of which fall arrest equipment is required and how to use it correctly; and
- · Be connected and secured against falling.

If you are a user of the scaffolding equipment, you shall at all times:

- · Adhere to the working at heights requirements;
- Ensure that the scaffolding has been authorised and tagged as safe for use;
- Report any unauthorised modifications that have been made to the scaffolding;
- · Report any defaults or damages to your supervisor immediately; and
- · Refuse to use scaffolding that is unsafe.

If you are the supervisor or person in charge, you shall:

- Ensure working at height rules are clearly understood and that fall arrest equipment is issued;
- · Confirm that it is safe to commence with the work at heights; and
- Stop any work on unsafe scaffolding and immediately remove the "safe to use" tag.

If you are part of the team that erects or dismantles scaffolding equipment, you shall:

- Ensure scaffolding is erected in accordance with design and or safety requirements;
- · Adhere to the working at heights requirements at all times including making use of the fall arrest equipment; and
- Intervene if your fellow team members are failing to use their fall arrest equipment.







Energy and machinery isolation

Test isolation before work begins and use specified life-protecting equipment



Carrying out isolations removes you from many dangers such as moving machinery, electricity, high pressure fluids, hot/toxic materials/chemicals, poisonous gas or radiation, and keeps you safe.

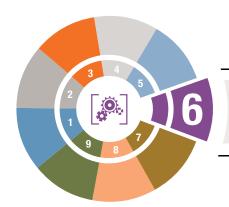
Specified life-protecting equipment such as isolation locks, multiple lock calliper devices, hostage boxes, valve clamping devices, etc. protects you from danger. You shall at all times:

- Understand the various isolations that protect you from harm;
- Confirm with the person in charge of the work that all required isolations are in place;
- Confirm with the person in charge of the work that it is safe to start the work;
- Ensure by test that the right equipment has been isolated;
- Attach your personal lock(s) to the isolation and lock out before commencing any work; and
- Intervene if your fellow team members have failed to adhere to the energy isolation requirements.

If you are the supervisor or the person in charge of the work, you shall at all times:

- Ensure your team have been issued with suitable isolation locks and equipment;
- · Confirm isolations are in place, including locks, switches, separate pipes with spades, or locked access doors, etc;
- · Confirm no stored energy or other dangers remain; and
- · Confirm that it is safe to start the work.





Moving and rotating machinery

Obtain authorisation before overriding or disabling protective equipment

Rule Six

Working in or around moving and/or rotating machinery can pose a threat to your safety when exposed to unprotected nip points. Safety-protective equipment must work correctly to keep you safe. Examples include safety doors, guards, trip/interlocking systems, isolation and lock out devices, alarms, level controls and in-vehicle monitoring systems.

In order to keep you safe at all times, you shall:

- · Avoid engaging in any work that exposes you or your colleagues to unguarded nip points;
- · Obtain authorisation from the person in charge before overriding or disabling a safety-protective device;
- Ensure all safety devices and guards are replaced and in working order after maintenance work has been conducted;
- · Report any damaged or missing safety-protective equipment; and
- Intervene if others are engaging in activities that expose them to unguarded nip points.

If you are the supervisor or person in charge, you shall:

- · Identify the safety critical equipment in the workplace;
- Ensure nip points are guarded to prevent access and exposure;
- · Ensure safety critical equipment is included in inspection and maintenance systems; and
- · Ensure authorisation for overriding or disabling a safety-protective device comes from the right person.







Lifting and materials handling

Do not stand or walk under suspended load

Rule Seven

Working or walking under a suspended load or into the drop and/or danger zone is unsafe as the load can fall on you.

A suspended load is an object that is temporarily lifted and hangs above the ground. In order to keep you safe at all times, you shall:

- Never cross a barrier controlling an area with a suspended load without authorisation;
- Follow the instruction of the person in charge of the lift;
- If involved in the lifting activity, make use of a tag-line and stay clear of the drop and danger zones and warn others to stay clear; and
- Intervene if you notice any person entering the drop or danger zones.

If you are the crane operator, you shall:

- Refuse to commence with lift if the load is not properly secured and/or tag-line not used; and
- Cease operations if any person enters the drop or danger zones.

If you are the supervisor or person in charge, you shall:

- Ensure understanding of the definition of a drop or danger zone;
- Ensure suitable equipment is available to barricade off a lifting zone and prevent access, or have a person(s) at the area warning others from entering the drop or danger zone;
- Ensure correct equipment is used for rigging and lifting a load as well as use of tag-lines; and
- Ensure controls are in place to prevent persons entering drop and/or danger zones.





Handling hazardous substances

Conduct a chemical assessment and wear specified PPE when required

Rule Eight

Chemical assessments are necessary where hazardous substance are handled, stored and transported. This keeps you safe from chemical exposure that can cause fire or explosion.

In order to stay safe, you shall always:

- · Confirm with the person in charge of the chemical handling that the chemical assessment is carried out and up-to-date for the specific chemical;
- · Understand what PPE and precautionary measures are required for use of the specific chemicals to be used;
- Confirm with the person in charge of the chemical handling that it is safe to start work and handle the chemicals;
- Stop work if you detect or suspect chemicals are above the common nuisance levels;
- · Understand where the designated escapes, safe refuges, assembly areas, emergency showers, eye wash fountains and other emergency response equipment are located; and
- · Intervene if you see someone handling or disposing of chemicals without wearing the prescribed PPE, failing to adhere to the safety procedures or endangering the safety of others.

If you are the supervisor or person in charge of the work, you shall:

- · Ensure chemical handling assessments have been conducted for chemicals handled, stored or transported in your area of
- · Ensure the persons handling the chemicals have been instructed in the safe handling and precautionary measures;
- Ensure relevant PPE has been issued for the respective chemicals to be used; and
- Confirm that it is safe to start chemical handling work.







Working in the forests

When working in the forest, keep a safe distance at all times

Rule Nine

Entering a designated harvesting area is unsafe as a tree or log could fall on you and/or a vehicle hit you.

Maintaining safe distances from felling and loading activities, vehicles and equipment keeps you safe. You shall therefore at all times:

- · Avoid entering a harvesting area without authorisation;
- Follow the instruction of the person in charge of the harvesting operation;
- · Understand what the defined safety work rules are;
- Ensure you are in visual sight of the operator of the equipment;
- Wear the high visibility equipment;
- Stay clear of loading and off loading areas at all times.

If you are the supervisor or person in charge of the forests work, you shall:

- Ensure clear understanding of the safety distances by all employees and contractors;
- Ensure safety distances are maintained at all times;
- Ensure systems are in place to prevent unauthorised persons entering the harvesting compartments;
- Ensure controls are in place to explain the safety rules to all persons working on or visiting the site; and
- Ensure clear rules are implemented to ensure loading areas are "No Go" areas.



6. Questions and Answers

01: Why was it necessary to revise the 2012 Safety Rules to Live By?

A1: Many of the immediate and contributing factors leading to past fatalities and life-altering injuries have been attributed to failure to comply with the Safety Rules to Live By. We are determined to save lives and prevent life-altering injuries and therefore have made these rules obligatory with very clear instructions for all involved.

02: Why have the Nine Safety to Live By been selected?

A2: The rules are not new. However the revised version focuses on those behaviours that carry the greatest potential threat of fatal and life-altering injuries to our employees, contractors and visitors when not observed. They contain enforceable behaviours to ensure that everyone who works for or on behalf of Mondi adheres to them at all times.

03: What are the main changes that have been made to the 2014 revision of the rules?

Some additional behaviours have been listed in each of the Nine Safety Rules to Live By with emphasis on the role of the A3: supervisor and/or person in charge.

04: How do the Nine Safety Rules to Live By support our caring culture?

A4: We have three values: passion for performance, acting with integrity and caring for our people and the environment. Our Nine Safety Rules to Live By support these values and focus our attention on nine selected high-risk activities.

Q5: Does this mean other safety rules are not as important?

All our safety rules, procedures and safe practices are important in achieving our commitment of zero harm to people and A5: the environment. We want to see compliance with all rules, every time, not just the Nine Safety Rules to Live By.

Q6: Am I expected to report rule breaking?

Absolutely! Intervening will help us prevent injuries and potentially save lives. If you see a rule being broken, we expect A6: you to intervene if it is safe to do so. Ignoring or breaking rules is unacceptable. If the unsafe act persists or if the violation jeopardises peoples' lives, immediately escalate it to the supervisor/person in charge of the work activity or your supervisor. We expect and encourage people to report rule breaking so that we can improve the safety of our operations. We do not want a culture that inhibits people from intervening and will always support those who intervene.

07: How will you stop the temptation by some operations to not report all their incidents?

If you choose to stop reporting non-compliances you are choosing to make a work site or workplace more hazardous. A7: We will continue to positively reinforce our reporting culture.

08: If I break one or more Safety Rules to Live By, will I be dismissed?

All our safety rules exist to protect people. We are investing a lot in ensuring people know the rules. We would rather A8: take disciplinary action than allow people to take risks that could result in them hurting or fatally injuring themselves or others. Each incident is thoroughly investigated. Failure to comply with any of the Nine Safety Rules to Live By will result in disciplinary action up to and including termination of employment for employees, contractors or lower-tier contractors, removal from site and disqualification from future work (depending on the findings). If the employee and/or contractor is aware of the rule or procedure through training, experience or communication and did not comply with that rule or procedure, the most appropriate disciplinary action in accordance with local law will be applied. In addition, if supervision tolerates the conditions for rule breaking or fails to take the necessary action if a rule is broken, the most appropriate disciplinary action in accordance with local law will apply to the supervisor involved.

09: What does the maximum appropriate disciplinary action mean?

A9: In each case of a breach there will be an investigation in line with the appropriate local policy and practice. The severity of the disciplinary action will be applied depending on the outcome of the investigation and local employment laws.

Q10: Who takes the decision on disciplinary action?

The decision on disciplinary action will be taken only after a thorough investigation and in accordance with the established A10: local disciplinary law. Typically the most senior manager in the operation will decide on the appropriate disciplinary action. Where necessary, that manager may elect to escalate the decision to the Business Unit CEO or Business Segment COO depending on the nature of the violation. The decision to dismiss can only be taken by the management of the company that employs the individual. However, different countries have different legal frameworks. The general principle will therefore need to be adapted within the local legal framework.



6. Questions and Answers continued

Q11: I'm a supervisor. If one of my team members breaks a rule, what is the consequence for me?

A11: Supervisors have a key role to play in reinforcing and ensuring compliance with the Nine Safety Rules to Live By by employees or contractors. If they see a rule being broken or become aware that a rule has been broken, supervisors need to initiate an investigation. Should a rule be broken and the supervisor tolerates the action or fails to take the necessary action, the most appropriate disciplinary action in accordance with local law will apply to him or her.

Q12: Are the Nine Safety Rules to Live By relevant for contractors?

A12: While conducting business for Mondi, compliance with the Nine Safety Rules to Live By is mandatory for all contractors in addition to any of their own safety rules. Prior to doing work for Mondi, a contractor must be verifiably briefed about the Nine Safety Rules to Live By.

Q13: I'm a contractor. If I see a rule being broken but do not report it, what is the consequence?

A13: We expect and encourage everyone to report any safety violation. An environment that tolerates the breaking of safety rules is not acceptable. We will investigate and address each situation on a case-by-case basis following a just and fair investigation. We want to create a proactive reporting culture where we address unsafe acts and situations proactively; we do not want to create a culture where reporting goes underground.

Q14: I am sometimes pressured into taking shortcuts. How do I deal with this?

A14: Please discuss this with your supervisor or report it anonymously to the Speakout helpline. Time pressures or meeting planned targets are never reasons to break the rules. Safety always comes first.

015: Can we add rules?

A15: The Nine Safety Rules to Live By (wording and icons) cannot be changed. However, operations can and will have additional safety rules that they should add to these nine rules.

Q16: Are the Nine Safety Rules to Live By relevant to the office environment?

A16: Compliance with the Nine Safety Rules to Live By is mandatory for all employees and contractors while conducting Mondi business. Certain rules will simply have more relevance in some settings than others. Office personnel may for example be exposed to building maintenance or window cleaning activities and would be expected to apply the Nine Safety Rules to Live By, just like any other employee or contractor.

Q17: Do the Nine Safety Rules to Live By apply when on a business trip?

A17: As part of the drive for zero harm, we expect our employees to follow the Nine Safety Rules to Live By at all times when conducting business related activities. For example when using a taxi, the use of seat belts remains a requirement. In countries where seat belts are not always available in a taxi, effort should be made to pre-book a car that is fitted with seat belts, especially if the driving conditions are high risk.

What does 'appropriate consequence' mean and do we ensure that the investigations are carried out fairly and without bias against the employee?

A18: All reported breaches will be investigated thoroughly, fairly and on an individual basis in line with the established local policy and practice. "Appropriate consequence" has different meanings in different situations/locations and is therefore dependent on the outcomes of the investigation, risk level and local legislative framework. Investigations should take place as per the current investigation process, ensuring fairness and transparency.

Q19: What is the benefit of implementing the Nine Safety Rules to Live By?

Ensuring these Nine Safety Rules to Live By are adhered to by everyone will assist in eliminating fatal and life-altering injuries in our operations. We all have a responsibility to ensure that we, our fellow employees and our contractors can return home safely to their families at the end of every working day.

Document control

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relevant sources.