Frequently Asked Questions about the Life-Saving Rules

ENFORCEMENT

Q1. Why has PDO introduced the "consequence matrix" for Life-Saving Rules? Isn't its safety culture good enough?

A1. PDO cares about the well-being of the people who work directly or indirectly for the Company. To prevent PDO and contractor staff from hurting themselves and others through work-related accidents, safety rules of various kinds have been put in place. But our 2013 safety performance (167 people injured, including 3 work-related fatalities) provides ample evidence that less than 100% of PDO staff and contractors comply with safety rules.

Until our behaviours and attitudes have changed to the point where we follow safety rules without even thinking about them, we have to encourage all staff and contractors to make a personal commitment and conscious effort to comply with the Life-Saving Rules; we cannot leave it to their discretion. Such encouragement will be readily accepted by some through, say, defensive-driving courses and driving forums. But others, unfortunately, can be encouraged only by stronger means. That is why we have instituted the consequence matrix. There must be serious consequences for those who choose not to follow the rules in view of the impact of non-compliance on people's lives.

The important thing, however, is to remember why we have the Life-Saving Rules: to prevent work-related deaths. If we all can abide by them, then we greatly improve our chances of not having any more work-related fatalities.

Q2. What exactly do I do if I see a PDO employee or contractor employee breaking a Life-Saving Rule?

A2. If it is safe to do so, intervene respectfully to stop the breaking of the rule. You may be the last chance to prevent an injury or fatality! Such respectful intervention is known as peer-to-peer coaching, and it can be a very effective way to improve everyone's safety without invoking the consequence matrix. If your respectful intervention is met with resistance, or if it's clear to you that the person does not care at all about safety, then report the incident to your supervisor.

Q3. Where can I find the disciplinary procedure by which a PDO employee might be dismissed for having broken a Life-Saving Rule?

A3. The procedure can be found in Section 1.5 of the Employee Policy Manual, which has been updated to clarify its relevance to the Life-Saving Rules. Click here to access the webpage containing the relevant section.

Q4. Will contractors also be expected to dismiss any of their own staff who are caught breaking a Life-Saving Rule?

A4. What contractors do with the rule-breakers amongst their own staff is up to the contractors themselves. PDO reserves the right to bar contractor staff from working at a PDO site if an investigation has revealed that they knowingly and wilfully broke Life-Saving Rules, but they would be free to work elsewhere for the contractor at the contractor's discretion. PDO requires only that contractors have some enforced consequence-management procedure in place for the Life-Saving Rules. It would not be surprising, however, if some contractors adopt a consequence matrix similar to that of PDO.

Q5. How long will Life-Saving Rule warning letters be kept in PDO personnel files?

A5. A first Warning Letter will be kept in an employee's personnel file for a period of one year, after which it expires. Final Warning Letters, however, may remain in the file indefinitely.

- Q6. What happens if an employee refuses to use the web application to confirm that he understands the Life-Saving Rules and the consequences of breaking them?
- A6. Signing off on the Life-Saving Rules will be mandatory, forming part of the employment terms and conditions of PDO. Staff will thus be chased for sign-offs, just as is done for the annual Conflict of Interest declaration. Staff who do not have access to the web application will be asked to sign paper documents that will be kept on file.
- Q7. Isn't firing someone a bit extreme for breaking a Life-Saving Rule particularly if no one is injured?
- A7. All our safety rules exist first and foremost to protect people. Firing someone is the absolute last thing we want to do. But we simply cannot tolerate people in our organisation who do not care for themselves or for others. Unintentional mistakes are always possible, of course. And that is why we require that a rule-breaking incident be thoroughly investigated *before* any disciplinary action is taken. This process ensures that employees are treated fairly and that the actual as well as potential impacts of noncompliance are taken into consideration.
- Q8. According to the consequence matrix, if one's rule-breaking caused "injury or death", then one will be subject to dismissal proceedings. How is "injury" defined?
- A8. By "injury", the consequence matrix means a lost-time injury, that is, one serious enough to require the victim to stay away from work to recover.
- Q9. Do you really expect me to report on my work colleagues if I see them breaking the Life-Saving Rules?
- A9. No, not to begin with. In the first instance, we would expect you to speak to your colleague and voice your concern over his or her breaking of a rule. We call this peer-to peer-coaching, and it has its foundation in the Golden Rules: Comply, Intervene and Respect. By respectfully intervening you are not only helping a colleague to stay safe but also creating a safer workplace for everyone. If your well-intended intervention is met with rudeness or with continued non-compliance, then you must speak to your supervisor someone's life might depend on it!

ALCOHOL & DRUGS

- Q10. What is the position on prescription or over-the-counter medicines (e.g. medicines which make you drowsy)?
- A10. Your Supervisor or the Person in Charge must be informed if you are taking medicine that may negatively affect your work performance. It is his responsibility to assign work only to people who are fit to work. And it is your responsibility not to drive if you are taking medicines that impair your driving abilities. (If in doubt as to the effect of medication, seek a doctor's advice.)
- Q11. Does the no-alcohol rule also apply on weekends for those who are on duty (e.g., staff who are providing weekend/holiday cover for rigs and hoists)?
- A11. Yes. If you are on duty, then you have made a commitment to be ready to make a work-related decision or perhaps drive to the office upon being called. Since you don't know when exactly you will be rung or paged, you should refrain from drinking alcohol during your on-call period.
- Q12. What about people who are on Emergency Centre duty? Do they have to refrain from alcohol when on call?
- A12. Yes, for the same reason as above: you never know when you may be called upon to do work for the Company, so you should refrain from drinking alcohol during your on-call period.
- Q13. Is the Ras al Hamra Recreation Centre, where alcohol is served, considered a worksite?
- A13. No, the RAHRC is a considered a private area and not a worksite; however, the laws of Oman apply to drinking and driving at the RAHRC.

- Q14. How about the bars at PDO's interior locations? Are they considered part of the worksite?
- A14. No. They are regarded in the same way as the coastal Ras al Hamra Recreation Centre (see above).
- Q15. What is the blood alcohol content threshold over which I would be considered to be under the effect of alcohol?
- A15. PDO applies the same threshold as that applied by the Royal Oman Police: zero.

ROAD SAFETY

- Q16. Are back-seat passengers required to fasten their seat belts, even though government rules do not require them to do so?
- A16. Yes. The seatbelt rule pertains to all passengers front and back in vehicles being driven by PDO staff or contractor staff as part of their work.
- Q17. Do pregnant women need to wear seatbelt too?
- A17. Yes. The seatbelt rule pertains to all passengers pregnant or not in vehicles being driven by PDO staff or contractor staff as part of their work. It is proven that correctly worn seatbelts considerably reduce the risk of a pregnant woman losing her unborn child in a road accident.
- Q18. What are the ROP's speeding thresholds, to which PDO will also adhere in enforcing the no-speeding Life-Saving Rule?
- A18. PDO can't speak for the ROP. But if the ROP maintains that you were speeding while you were carrying out work-related activities, then PDO will certainly take their word at face value. PDO, however, will be relying mostly on its Road Safety Standards Teams to monitor driving behaviour within its concession area and at its coastal sites. They are equipped with accurate radar guns. And in their case, the speeds posted on road signs are the maximum allowable speeds for PDO drivers.
- Q19. What would happen if one is caught breaking a road-safety Life-Saving Rule while driving a PDO pool car but outside of working hours?
- A19. If you drive a PDO pool car, then you are expected to comply with all PDO rules, including the Life-Saving Rules.

CONTRACTOR WORKFORCE

- Q20. As contract holder, do I have to inform a contractor about the Life-Saving Rules, even though the contract I hold involves no contractor personnel on PDO sites?
- A20. Yes, the Life-Saving Rules apply to any activity related to PDO work.

WORKING AT HEIGHT

- Q21. Does the "working at height" rule apply to members of the Fire and Rescue Service, who are expected to climb ladders to heights above 2 metres without fall-protection equipment?
- A21. No, for their very specific work requirements in the event of an emergency, the rule is waived.

OTHER

- Q22. What happens to the Golden Rules, the House Rules and all the other rules?
- A22. The Life-Saving Rules do not cancel any other Company rule; they are simply a Company-rule subset that has been deemed to be particularly important with respect to the prevention of fatal accidents. All other rules, regulations and procedures remain as important as ever.

Q23. Isn't the Life-Saving Rules consequence matrix just a trick to dismiss staff and release contractors?

A23. No, most definitely not. We're looking to keep everyone safe – and in their jobs – by ensuring that everyone follows the rules – particularly those related to activities with the greatest potential for killing or seriously injuring people.

Q24. Don't you think the severity of the consequence matrix will inhibit people from reporting incidents of rule-breaking?

A24. We don't think so. Most staff realise that following the rules is the right thing to do, and coaching their colleagues to do the same makes everyone's workplace safer. So we don't expect work colleagues to report on each other; instead, we hope that they will intervene respectfully whenever necessary. Such peer-to-peer coaching is the first step in instilling the behaviours that can save lives – and that is, after, all the ultimate goal.

But if your respectful interventions do not seem to help or if you are told to mind you own business, then you should speak to your supervisor. Your supervisor is responsible for investigating the matter further and – if required – applying the disciplinary action as specified in the consequence matrix.

Q25. Given the current tough economic conditions, won't PDO management turn a blind eye on safety compliance so as to ensure that the Company produces enough oil and gas for the Nation?

A25. Most definitely no. Allowing people to ignore or break safety rules is totally against the general business principles that govern our Company's ethics. What's more, it's clear that a safe working environment also makes good business sense – it's the most efficient way to operate.

Q26. What about an emergency situation in which strictly following the "permit to work", "journey management" or "safety override" Life-Saving Rules might result in additional oil deferment? Will management still insist on 100% compliance?

A26. Yes. In fact, the Company's safety rules must be followed *especially* in times of emergency. Limiting the deferment of oil definitely does not have higher priority than the safety of people.

Q27. What about new employees and contractors? Will they have to sign off on the Life-Saving Rules?

A27. Yes. The Life-Saving Rules will become part of our induction process for all new staff and contractors; their understanding of the rules and the consequences of rule-breaking must be acknowledge before they start work.

Q28. Can I provide some feedback about the Life-Saving Rules?

A28. Of course. You can provide feedback to your line manager, your HSE focal point or send an e-mail to: ram.k.nivedita@pdo.co.om.

Q29. What about visitors or family members, that is, people who are neither PDO staff nor contractor staff? Do they have to follow the Life-Saving Rules while they are on PDO property or in the Company's concession area?

A29. PDO cannot act as the Nation's policeman – not within our own concession area and not even at our work or office sites. The Life-Saving Rules will be imposed only on people over whom PDO exerts some degree of leverage – namely, its staff and contractors. Should you see a visitor breaking a Life-Saving Rule, then you should intervene respectfully to explain to him what he's doing wrong. But the rule-breaking cannot be formally reported within PDO. The Life-Saving Rules are listed in the Visitor Registration online gate-pass link and requires visitors to acknowledge reading and understanding the same for issue of a gate-pass.