

	LBC Corporate Social Responsibility	
	Management Policy	Sustainable Safety Behaviour Program (PEER) Phase 3

## 1. Purpose

This document provides background information relating to Phase 3 Roll-Out of the LBC Group Corporate Social Responsibility Sustainable Safety Behavior Program known (at management level) as **PEER** that finds its roots in “responsible and collegial safety behavior” and is aimed at making safety a **Core Value** of all employees within LBC world-wide.

The **PEER program phase 3** focusses on:

- Further development and implementation of the operational safety policies and management system policies detailing minimum requirements for employees and contractors working within LBC facilities
- The continual progression from a reactive to proactive culture by the introduction of a proactive KPI monitoring program.

The aim of this is to achieve a safe and healthy working environment in which everybody can have the confidence that they will return home safe and well at the end of every shift and an environment in which material damages and customer complaints are continually reduced.



**Note:** Group LBC Safety Policies and Management System Policies detail minimum requirements that describe “**what**” is expected but not “**how**” to do it. This allows the individuals with responsibility for implementing policies the freedom to implement the minimum requirements in the best way for their facility taking culture and infrastructure into account. Further, this allows us to further develop the **P**ersonal involvement, **E**ngagement, **E**mpowerment and **R**esponsibility of individuals working in our organizations.

## 2. Scope

The roll-out of the Phase 3 **PEER** program within all LBC facilities to all LBC employees and embedded contractors working at all LBC facilities.

## 3. Definitions

- 3.1. **LBC Facility** indicates any LBC location owned or rented by LBC where LBC employees work. This can be an Office or a Terminal (inclusive Head Office)
- 3.2. **Terminal Manager** indicates the most senior person in the terminal responsible for the terminal and its offices. This person could be called the Terminal Director at some locations.
- 3.3. **ELT** – Executive Leadership Team
- 3.4. **MOC** – Management of Change Process
- 3.5. **Collegial behavior** in the context of safety can be defined as a work environment where responsibility and authority is shared equally by colleagues.
- 3.6. **Reactive Safety KPI** – this is a lagging indicator in which incidents are monitored and correction is needed
- 3.7. **Proactive Safety KPI** – this is a leading indicator in which behaviors and deviations that have not yet resulted in incidents but which have the potential to lead to incidents are monitored and analyzed and preventative measures put in place

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Author	Position	Department	Approved by GCSR	Approved by CEO
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3.8. **PEER** is a management acronym meaning:

- **P**ersonalize safety
- **E**ngage everybody in safety
- **E**mpower everybody to act
- **R**esponsibility

#### 4. Responsibility and authority.

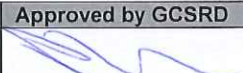

- 4.1. The **Group Corporate Social Responsibility (CSR) Director** is responsible to define the minimum requirements and to provide training to the Terminal Manager, the ELT, all employees working in the Head Office and the Regional Business Presidents to facilitate implementation at all LBC facilities.
- 4.2. The **Regional Business President** is to ensure 100% roll-out of **PEER** Phase 3 Program in his region to all his personnel and at all his facilities according to a time-schedule agreed between himself, the Terminal Manager and the Group CSR Director.
- 4.3. Each **LBC Terminal Manager** is responsible to ensure 100% roll-out of the **PEER** phase 3 program at his facility for all LBC personnel and embedded contractors according to the agreed time-schedule defined in 4.2.
- 4.4. The **Group Human Resources Director** is responsible for ensuring that all facilities include an up to date **PEER** induction training for all new employees.


#### 5. Compliance

- 5.1. There should be a local system in place that includes a clear and auditable process to ensure that all (new) employees and (new) embedded contractors receive the defined trainings relating to all aspects of the **PEER** phase 3 Program.
- 5.2. There should be a clear and auditable local system in place whereby the elements of the **PEER** phase 3 Program are reviewed regularly for relevance (For example, during the annual Management Review) and where appropriate adjustments made.
- 5.3. There should be a clear and auditable local system in place that requires that all relevant information relating to the **PEER** program such as safety observations/interventions and deviation reports (such as near miss reports, unsafe situations, unsafe installations, quality etc.) are entered into the Group LBC SHEQ Database.

#### 6. Elements of PEER Phase 3 Roll-Out

- 6.1. Implementation of the LBC Corporate Social Responsibility Management System Policies
- Updated Group LBC Incident and Injury Reporting Policy (**January 2015**)
  - Group LBC Management of Change Policy (**November 2015 - June 2016**)
  - Group LBC Variance Policy (**November 2015 - June 2016**)
  - Group LBC Management of Contractor Policy (**January 2016 - October 2016**)
- 6.2. Implementation of Group Corporate Social Responsibility KPI's
- Introduction of a Group target related to the implementation of the MOC (**July 2015**)
  - Introduction of a Group MOC compliance target (**July 2016**)

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- Introduction of a Group near-miss reporting target per employee (July 2015)
- Introduction of a Group near-miss reporting "close-out" target (July 2016)
- Introduction of a Group Total Incident Frequency Rate target (July 2016)
- Introduction of a Group target related to the implementation of the Contractor Management Policy (July 2016)
- Introduction of a Group target related to compliance with the Contractor Management Policy (July 2017)

### 6.3. Implementation of Group Corporate Social Responsibility Operational Safety Policies

NB: Implementation dates and priorities for the gap analysis and roll-out of Operational Safety Policies is under review and will be published in January 2016

- LBC Group Permit to Work Policy (revised)
- LBC Group Hot Work Policy
- LBC Group Confined Space Entry Policy
- LBC Group Isolation of Energy Sources Policy
- LBC Group Electrical Safety Policy
- LBC Group Hoisting and Lifting Policy
- LBC Group Working at Heights Policy
- LBC Group Line and Equipment Opening Policy
- LBC Group Vacuum Cleaning Policy
- LBC Group Hydro blasting and High Pressure Washing Policy
- LBC Group Vehicles and Driving Policy
- LBC Group Loading and Unloading of Chemicals Policy
- LBC Group Personal Protective Equipment Standard
- LBC Group Conservation of Hearing Policy
- LBC Group Excavation and digging Policy
- LBC Group Critical Equipment Policy
- LBC Group Critical Equipment Calibration and Testing Policy
- LBC Group Emissions and waste treatment Policy
- LBC Group minimum design criteria Policy

### 7. Tools and Resources available for PEER Phase 3 Implementation

- Support and guidance from CSR Team
- Training tools to support implementation
- Group Policies detailing minimum requirements
- Where necessary assistance with performing GAP analysis
- Compliance audits and feedback

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