



Corporate Plan

Life Saving Rules Implementation Plan




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1. Purpose

This Life Saving Rules Implementation Plan provides the BW Energy prerequisites, resources, timeline, and steps for implementation of the IOGP Life Saving Rules.

2. Scope

This is a Corporate Plan and applies to all BW Energy (BWE) operating locations.



ATTENTION: If this content conflicts with applicable regulations, then the applicable legal regulations shall be followed.

If this content creates a higher obligation, then it shall be followed if full compliance with applicable regulations is also achieved.

3. Company References

The following BWE references provide additional information that relates to this document.

Table 1. Company References

Document Number	Full Title
CORP-POL-0003	Health, Safety, and Environment Policy
<TBD>	LSR Implementation Plan and Task List
<Various>	OMS Standard, Policies, and Procedures
—	—

4. Responsibilities

The following personnel are responsible for completing specific tasks.

Table 2. Personnel Responsibilities

Title	Responsibilities
Director of HSEQ and Operational Readiness	<ul style="list-style-type: none"> Support implementation and help maintain a culture in accordance with LSR use Develop LSR Implementation and rollout plans, timetables, requirements, and specifics Conduct Gap assessment on BWE OMS contents
VPs, Operations (Region)	<ul style="list-style-type: none"> Support implementation and help maintain a culture in accordance with LSR use Develop LSR Implementation and rollout plans, timetables, requirements, and specifics

Title	Responsibilities
Head of HC	<ul style="list-style-type: none"> Clarify policies and procedures related to LSR implementation and rollout Support implementation and help maintain a culture in accordance with LSR use
Asset/Project HSE Managers	<ul style="list-style-type: none"> Support implementation and help maintain a culture in accordance with LSR use Assist in determining the best course of communication for LSR materials Verify Implementation of and adherence to LSR principles.
Technical and Maintenance Managers	<ul style="list-style-type: none"> Support implementation and help maintain a culture in accordance with LSR use Assist in determining the best course of communication for LSR materials
LSR Champions	<ul style="list-style-type: none"> Maintain attitude and commitment appropriate to implementing LSRs Support implementation and help maintain a culture in accordance with LSR use Assist in determining the best course of communication for LSR materials
Senior Management	<ul style="list-style-type: none"> Set expectations for and support LSR implementation and rollout.
All personnel at all facilities or locations	<ul style="list-style-type: none"> intervene or stop work, without adverse consequences, if they are in any doubt about the safety of an activity.

5. Health, Safety, and Environment Requirements

All personnel are responsible for maintaining a safe work environment. Refer to BWE's *Health, Safety, and Environment Policy* and any applicable task-specific procedure.

6. Introduction

6.1. Background

In 2018, IOGP re-examined the applicability of the 2010 Rules against the most recent fatality data. IOGP issued Report 459 on their re-examination and launched a simplified set of Life Saving Rules (LSR) to provide workers in the industry with the actions they can take to protect themselves and their colleagues from fatalities.

With a reduced number of rules (9 reduced from 18), but still covering a similar scope, IOGP aims to improve the level of industry-wide adoption across the global oil and gas industry. Since 2008, 376 lives could have been potentially saved by following the revised IOGP Life Saving Rules.

The IOGP Life Saving Rules are not intended to address all risks and hazards in the oil and gas industry; they are meant to draw attention to the activities most likely that lead to a fatality, and the life-saving actions over which an individual has control.



The IOGP Life Saving Rules are intended to support existing company management systems. They are not intended to replace company management systems, policies, safety training programs, operating procedures, or work instructions, and in fact, rely on this framework being in place.

Adoption of the Life Saving Rules within BWE will:

- Enable better transfer of knowledge, experience and lessons learned.
- Increase individual awareness and ownership of critical safeguards that prevent fatalities.
- Encourage an industry-wide common safety language, especially with contract personnel.
- Improve clarity and encourage consistent use by contractors and operators doing similar work on BWE operating FPSOs and Projects.

To achieve the benefits of standardization and prevent workforce fatalities, all 9 Life Saving Rules should be adopted as written and not be modified or substituted. BWE intends to follow the guidance provided from IOGP in the following manner:

- BWE will adopt the IOGP Life Saving Rules, to complement existing Policies and Procedures on safe work practices, by mapping each of the 9 Rules against the corresponding documents within the BWE Operations Management System (OMS).
- BWE will encourage contractors working at all BWE locations to implement the revised IOGP Life Saving Rules.

6.2. Structure of Document

The plan for implementing the LSRs is laid out in Section 7. The sections that follow provide clarity and further develop plans and requirements for implementation.

6.3. Responsibilities

Requirements and associated responsibilities for implementing this Plan are defined in Sections 3 and 7.

6.4. Conformance, Deviation and Legal Compliance

If there is a conflict between this Plan and applicable legal and regulatory requirements, the applicable legal and regulatory requirements shall be followed. If this Plan creates a higher obligation, it shall be followed as long as full compliance with applicable legal and regulatory requirements is also achieved.

6.5. The Life Saving Rules

The nine Life Saving Rules are as shown below. These Rules focus on the activities which, through rigorous data analysis, have been shown to most likely result in fatalities. Each Rule consists of an icon and simple life- saving actions that individuals can take to prevent a work-related fatality.

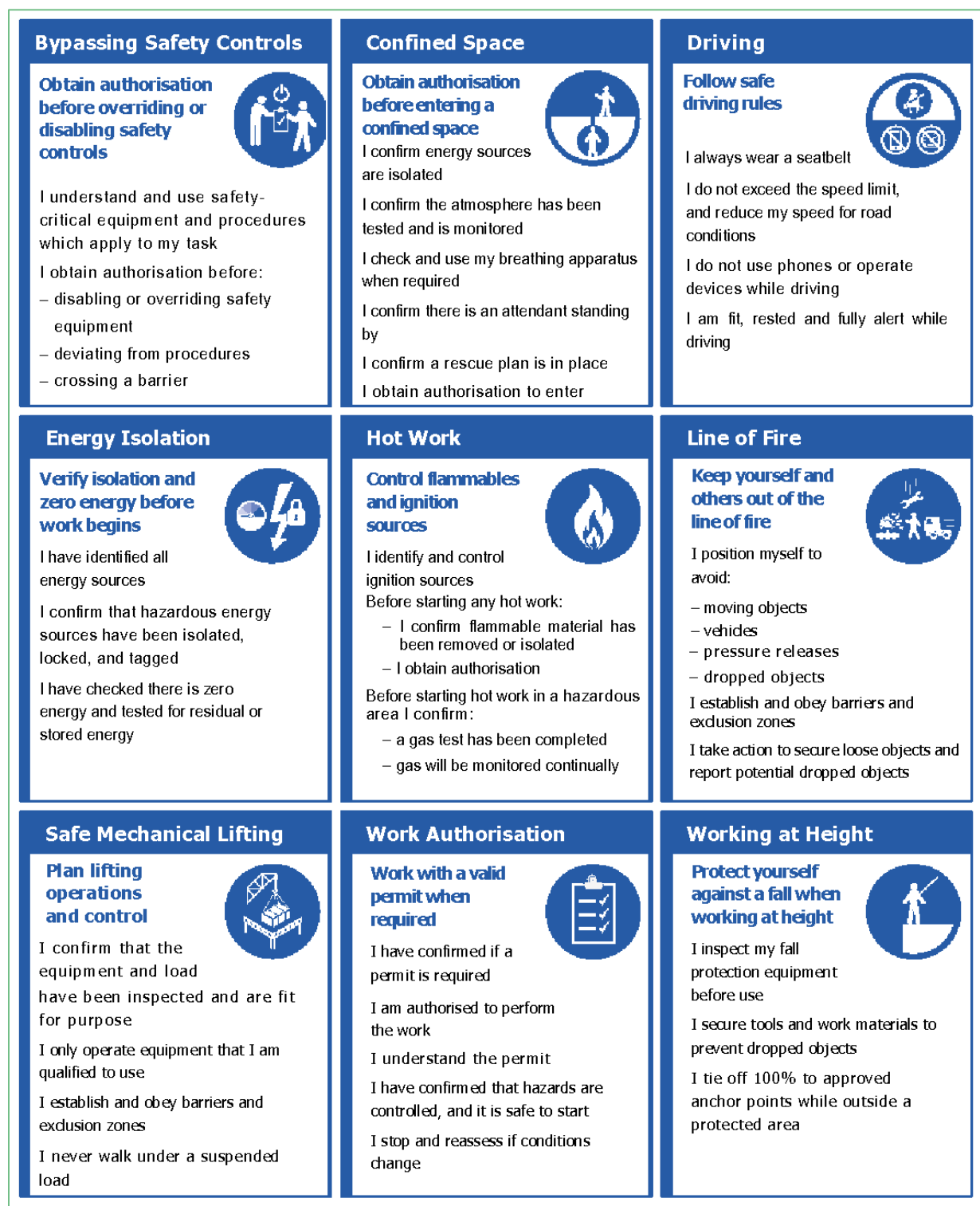


Figure 1. Life Saving Rules



7. Life Saving Rules Implementation Steps

To implement this Plan the following steps shall be followed. Additional information and guidance is given in the sections that follow.

Step	Action	Performed by
1.	Review Lessons Learned from BWE and other IOGP experiences in implementing LSRs at all BWE sites and facilities.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)
2.	Conduct gap assessment on BWE OMS standards and map procedures against each LSR.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)
3.	Revise BWE OMS procedures where required to match with the 9 LSRs.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)
4.	Ensure Hazard Identification and Awareness and Risk Assessment procedures for both BWE operations and projects are socialized at all locations. Examine methods used to ensure systems are understood and followed by employees. Conduct random checks within offshore and project worksite teams to verify understanding. Develop remedial measures, if required, prior to introduction of LSRs.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)
5.	Clarify requirements for compliance with Fitness for Duty and Drug & Alcohol Policies with HC. Ensure workforce are familiar with Policy requirements and enforcement regime. Provide support to LSR Champions to socialize requirements to workforce at all locations.	Head of HC
6.	Work with HC to develop a Journey Management Program.	Head of HC
7.	Work with HC to clarify how disciplinary process would work throughout BWE for failure to follow LSRs. Socialize the disciplinary process throughout BWE.	Head of HC
8.	Introduce LSRs to HSE Managers and Offshore HSE Superintendents.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)



Step	Action	Performed by
9.	Introduce LSRs to Project Managers and Project HSE Managers.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)
10.	Develop BWE LSR presentation for site roll out. Fine tune existing any LSR materials to include roll out steps and other needs. Circulate those to stakeholders to gain buy-in and approval for use. Develop hand out materials for distribution to attendees.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)
11.	Identify LSR Champions at each FPSO and Project location. Familiarize them with requirements. Schedule follow up activities to monitor roll out and ongoing use of LSRs.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)
12.	Decide which IOGP materials are suitable for BWE roll out. Customize IOGP materials where required. Arrange printing and distribution to all locations.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)
13.	Perform gap assessment on Contractor's HSE Management System and ensure bridging arrangements are in place particularly for projects both onshore and offshore.	Asset and Project HSE Managers
14.	Ensure Safe Systems of Work are well understood, including PTW, Energy Isolation, Work at Height, and Confined Space Entry Requirements. Examine methods used to ensure systems are understood and followed by employees. Conduct random audits within offshore teams to verify understanding.	Asset and Project HSE Managers
15.	Ensure Management of Change Procedure is socialized to all work groups.	Technical and Maintenance Managers
16.	Develop BWE LSR information booklet.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)



Step	Action	Performed by
17.	Deliver LSR roll out information at all locations.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)
18.	Develop specific LSR e-learning materials. Competency-based learning should be based on IOGP materials.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)
19.	Monitor effectiveness of LSRs across the workforce. Develop a robust follow up process to ensure LSR is being effectively incorporated across all sites. Update plans to ensure assurance activities have been captured at pre-determined intervals across all locations.	Director of HSEQ and Operational Readiness, VPs, Operations (Region)

8. Implementing the Life Saving Rules

Standardization of LSR simplifies training, aids compliance and understanding of critical safeguards, and helps with transfer of experience and lessons learned. Effective industry-wide implementation requires collaboration between operators, contractors, and subcontractors.

To achieve the benefits of standardization, all 9 LSRs should be adopted as written and not be modified or substituted.

It is accepted that operational risk profiles may differ, and the LSRs may not address all an organization's fatality risks. In this case, companies are encouraged to manage these other risks through existing management systems, or in other ways, such as safety campaigns, training, and workforce engagement, rather than creating additional LSRs.

It is important that the LSRs are understood by all individuals, their supervisors, and their leaders, and that management have created the conditions necessary to enable everyone to follow the LSRs.

8.1. Fundamental Requirements

Successful implementation of the LSRs requires following the BWE OMS, containing the following supporting policies, processes and procedures as a minimum:

- Worker Fitness for Duty, including a drug and alcohol policy
- Contractor HSE Management program, including bridging arrangements, if applicable
- Journey Management program
- Safe systems of work, including permit to work and energy isolation



- Management of Change (MoC)
- Hazard Identification and Awareness and Risk Assessment procedures for operations and projects
- Assurance and Verification programs providing checking and verification of critical tasks.

In addition to the above listed policies, processes and procedures, it also requires:

- A commitment that work does not start until all individuals involved are aware of and can confirm they can follow the LSRs that are relevant to that work.
- A requirement that work is not conducted without a pre-job risk assessment and a safety discussion, such as a toolbox talk, appropriate for the level of risk.
- Definition of which procedures and equipment are safety critical and ensure impacted workers clearly understand what these are.
- That personnel are trained and competent for the work they conduct.
- That equipment is fit for purpose, properly maintained, and in good working condition.
- Incident response plans to be in place that have been developed from a review of potential emergency scenarios, with suitable and sufficient resources available, and which are periodically drilled/tested.
- Everyone to be authorized to intervene or stop work without adverse consequences if they are in any doubt about the safety of an activity.
- That suitable personal protective equipment is provided and worn in accordance with the requirements identified by the risk assessment and worksite policies.

8.2. BWE Operations Management System Procedures Supporting the Life Saving Rules

Each of the 9 LSRs must be analyzed and a determination made on which of the procedures within the BWE OMS correspond to and should be followed to effectively support following each of the LSRs. For example:

- LSR “Plan Lifting Operations and Control” would require the workers to follow the OMS procedures for safe lifting operations.
- LSR “Work with a Valid Permit when required” would require workers to follow all requirements of the Permit to Work procedures within the OMS.

Implementation resources (such as posters, presentation materials, and e-learning tools) shall also be developed as a reminder to all personnel of which specific processes and procedures within the OMS are to be applied in order to effectively follow the requirements of each of the LSRs.

8.3. Integrating the Life Saving Rules into Existing BWE Safety Processes and Procedures

During JSAs and Tool-box talks, the required LSRs shall be identified that correspond to the task being analyzed, or activity being discussed, along with the associated processes and procedures within the

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OMS that support compliance with the relevant LSR, to ensure they are followed as required during execution of the task.

Incident Investigations, Hazard and Safety Observation Cards, and results from Safety Walkabouts and Audits shall be analyzed to determine where LSRs had not been followed and the lessons from these lapses communicated to the workers during safety meetings, safety stand downs, and morning meetings at each location.

8.4. Lessons Learned in Life Saving Rules Implementation

Senior Management commitment is essential to successfully roll out the LSRs. The following steps for effective implementation are based on the experience of IOGP member companies that have successfully implemented LSR programs:

- Review high potential events within EHS Insight and determine how these align with the LSRs to use as examples during the roll-out.
- Develop a business case with leadership to ensure commitment to implement the LSRs.
- Ensure the implementation, use and compliance are owned by line-management and supported by the Asset and Project HSEQ professionals.
- Develop a communications and roll-out plan using the IOGP LSR roll-out and engagement materials for the implementation of the LSRs (communications plan and accountability and compliance strategy in consultation with HC).
- Develop performance monitoring methods to determine the effective implementation and ongoing use of the Life-Saving Rules.

8.5. LSR Champions and Roadshow

- Prior to commencement of the LSR Roadshows, engagement sessions should be conducted with the relevant site Managers to agree and appoint the site LSR Champions. The LSR Champions should be personnel who have the right attitude, aptitude, buy-in and commitment towards improving the HSE practices and implementation of the LSRs at their respective sites. At some sites, it may be the Health and Safety Representatives but there is no hard and fast rule.
- The LSR Roadshows should be conducted across all the operating locations.

8.6. Potential LSR Roll Out Challenges

- Changing the mindset of the workforce to adopt and accept the new set of LSR principles.
- Making translators available during the roadshows and workforce engagement sessions as needed. Doing this will hopefully encourage free dialog and discussions about the process..

8.6.1 Expectations

- BWE should expect that the implementation process may take more time for acceptance before it is fully integrated into the workforce.



9. Helping the Workforce Follow the Rules

Experience shows that the LSRs, when consistently applied, prevent fatalities. Simply communicating the LSRs and then holding people accountable for following them is not enough for effective implementation. To enable individuals to follow the LSRs, organizations need first to provide the right conditions:

- Everyone needs to know the LSRs, as well as understand their value and what following the LSRs means for their respective roles.
- The physical workplace conditions required to be able to follow the LSRs need to be present (for example. having certified anchor points provided for all work at height and vehicles equipped with seatbelts).
- There needs to be clear expectations set, supported from BWE Senior Management, that work must not start unless the LSRs can be followed, and these must be visible to the workforce by, for example, ensuring physical workplace conditions are present.
- Everyone must be given the authority and be encouraged to “Stop Work” and intervene if they observe an LSR (or any other unsafe act or condition) actually, or potentially, not being followed. Proactive intervention may be the last opportunity to prevent an injury or fatality.

The focus on personal accountability for following the LSRs is about care and concern for the individual and the well-being of everyone, both offshore on BWE facilities or at project work sites.

If an LSR is not followed, there is a need to determine the reason, to learn and improve workplace conditions, whether it resulted in undesirable consequences or not.

BWE encourages an open reporting culture, such as for self-reported errors, peer-to-peer interventions, and responding appropriately where cases of ‘non-reporting’ are found. The intent is to understand what conditions and working environment led to an LSR not being followed and for people to do what they did, so that lessons can be identified, applied, and learned.

10. Continued Engagement and Integration

The introduction of the LSRs to a workforce is not by itself enough to produce the tangible benefits of standardization. An ongoing effort is required to drive integration and conformance within the workforce. Tools (policies, procedures, and OI Standards) available within the BWE existing management systems should be used to continuously improve conformance to the LSRs. Examples may include:

- Awareness campaigns.
- Refresher training.
- Leadership site visits.
- Positive recognition of conformance and interventions.
- Feedback for improvement of compliance.
- Integration into contractors in the project environment or during offshore modification and maintenance campaigns.
- Use of IOGP LSR resources.

11. Communication of Life Saving Rules within BWE

The resources available to communicate the information needed to successfully implement the LSRs are described within this document and should in time include presentation materials, posters, a workbook, a pocket prompt card, videos, and e-learning.

Posters shall be displayed in strategic locations, such as meeting rooms, notice boards, mess rooms, control rooms, and stair wells offshore, and on notice boards, meeting rooms and administration areas onshore.

At offshore locations, tool-box talks, safety meetings, and job safety analyses will be used as a vehicle for highlighting the LSR requirements and to ensure those requirements are discussed and carefully considered before the issue of work permits and during the analysis of MOC requirements.

How the LSRs are communicated (by methods including posters, workbooks, and eLearning), where (all BWE locations: for example, offices, warehouses, shore-bases, or units), and when (for example during toolbox talks, townhalls, JSA, or other safety meetings) are best determined at each work location by the respective management team and the LSR Champion identified for each work location.

12. LSR Implementation Resources

IOGP provides materials to assist companies, available at: <https://www.iogp.org/lifesavingrules/>



NOTE: Some materials are only available upon agreeing with The Life-Saving Rules User Agreement (refer to inside cover), which states the conditions under which the LSRs icons and accompanying wording are made available.

These materials include:

Table 3. LSR Materials Available through IOGP

File type	Description	Audience/Purpose
Zip folder	EPS & PNG files of the icons	For signage and other communication needs
Work card	PNG file of a 'work card'	For implementing organizations to print as hardcopy 'work cards' for distribution.
Adaptable for use in signage and other communications		
Poster	Poster of all 9 Rules	For signage and communications
Presentation	Guidance to clarify the Rules	Introduction and further guidance on each Rule.
Presentation	Leadership engagement	Aimed at leaders, introduces the Rules and describes leadership expectations



File type	Description	Audience/Purpose
Videos	5 Reflective learning animated videos	There are 5 videos (Offshore, Road transportation, Manufacturing, Marine, Office), with two animations each. The first animation runs through a work scenario, the second shows the same scenario pausing to highlight Rules being followed or broken. The intent is for these videos to be used in facilitated group settings, where groups discuss what they have seen after the first animation and then see the 'reflection' video.
Translations	4 available at launch	The Rules translated into Portuguese, Norwegian, French, Arabic

13. Monitoring Implementation Effectiveness

The implementation of LSRs will be verified as part of the Assurance and Verification audits conducted on the BWE FPSO's and Projects using EHS Insight.

14. Implementation Timetable and Resources

Before LSRs can be rolled out, a plan for implementation that includes timetable and resources shall be developed. It is to be noted that activities and time frames stated within the plan must have a degree of flexibility, which will be further refined and determined in line with work requirements and circumstances relevant to each work site.

15. Training and Certifications

Before performing work associated with this Plan, personnel shall receive appropriate training and certifications. Refer to competency and training matrices.

16. Supplemental References

The following external references support this BWE Plan.

Table 4. Regulatory Standards

Document Number	Name of Agency	Document Title
—	—	—

**Table 5. Industry Standards**

Document Number	Name of Organization	Document Title
Report 459	IOGP	Revised IOGP Life-Saving Rules
—	—	—

17. Glossary

The following are definitions of terms and abbreviations as used in this document.

Table 6. Terms and Definitions

Terms	Definitions
Contractor	Organization providing services, materials and resources under Contract to BWE. This term includes the Contractor, his subcontractors, suppliers and their affiliates.
EHS Insight	Comprehensive software tool that provides Environmental, Health, and Safety programs.
Journey Management program	A systematic approach to planning and implementing strategies to reduce travel-related risks and ensure the safety of employees or customers during their journeys, whether for work or customer interactions
Key Control	Verifiable step in a procedure that must be implemented.
May	Indicates course of action that is permissible.
Shall/Must	An absolute requirement which shall be followed strictly.
Should	Is a recommendation. Alternative solutions having the same functionality and quality are acceptable.
—	—

Table 7. Abbreviations

Abbreviations	Terms
HC	Human Capital
HSE	Health, Safety, Environment
HSEQ	Health, Safety, Environment, Quality
IOGP	International Association of Oil & Gas Producers
LSR	Life Saving Rules
MOC	Management of Change
OMS	Operations Management System



Abbreviations	Terms
OI	Operational Integrity
VP	Vice President
—	—



18. Document Review and Revision Responsibilities

This document is subject to regular reviews to verify accuracy and effectiveness and to identify opportunities for improvement. Table 8 lists the personnel who are Responsible, Accountable, Consulted, and Informed (RACI) in that review and revision process.

- **Responsible** Does the work to review or revise this document.
- **Accountable** Delegates work and is the last one to review this document before it is deemed complete.
- **Consulted** Provides input based on either how it will impact future project work or their domain of expertise on the deliverable itself.
- **Informed** Regularly reviews to remain up to date with current versions.

Table 8. RACI Chart

Title	Responsible	Accountable	Consulted	Informed
Chief Executive Officer		X		
Director of HSEQ and Operational Readiness	X			
Vice Presidents, Operations			X	
Other Department Heads			X	
Senior Management			X	
All personnel				X

19. Document Revisions

Table 9. Summary of Changes

Rev #	Date	Description	Section(s)
0	01 Apr 2025	Issued for approval	All

Appendix 1. Symbology



WARNING: Indicates potential for:

- Risk of injury or death to personnel.
- High risk of damage to the company's reputation, relations, or financial status, or vulnerability to legal action.



CAUTION: Indicates potential for undesirable consequences of action or nonaction that may include damage to:

- Equipment or the environment.
- The company's reputation, relations, financial status, or vulnerability to legal action.



ATTENTION: Provides important information that is more critical than a NOTE but does not pertain to actions that can result in severe consequences.



NOTE: Provides information that is helpful in addition to the main content.