	Document Title:	General Policies
	Document No.:	QHS-0000-QA-PY-0007R02
	Department:	QHSE

1 PURPOSE

This procedure describes the general health and safety policies and procedures.

2 SCOPE

This procedure covers the general health and safety policies, this procedure defines each employees' responsibilities to comply with this procedure that:

WORKING SAFELY IS A CONDITION OF EMPLOYMENT!

3 RESPONSIBILITIES

Management

The ProSep Managers shall be responsible for maintaining a low risk work environment and shall be ultimately responsible for compliance to the following issues:

- 1) Ensure that all equipment and operations meet the requirements of the Health and Safety Requirements Manual and other applicable laws, regulations, standards and/or requirements.
- 2) Ensure a Risk Assessment is included in the design review process for new equipment, and the HSE Manager/Consultant is included in field modifications, redesigns, or additions to existing equipment ensuring compliance with UK HSE and/or USA and/or Malaysia OSHA standards.
- 3) Maintain surveillance of the work environment by establishing measures to control or eliminate the hazards associated with any operations (e.g. shift or environmental changes, etc.) or equipment.
- 4) Ensure that root cause investigations are completed on all tasks where occurrences, which can or could cause property damage, injury or illness to employees.
- 5) Assist in the development in employee's attitudes and awareness that will guide the employee into taking safe action when faced with situations not covered by established regulations and practices.


Quality Health, Safety and Environment Manager/Consultant

The Quality Health, Safety and Environment Manager/Consultant shall be responsible for providing training guidance and services needed by management to include, but not limited to the following items:

- 1) Development of safety policies, procedures and directives.
- 2) Continuous monitoring and improvement of operations to ensure a low risk work environment.
- 3) Preparation and maintaining the Health and Safety Requirements Manual.
- 4) Performing random safety audits to ensure compliance to health and safety policies and procedures. HSE shall issue corrective or preventive action requests when deemed necessary to correct existing or potential hazards that may cause accidents and/or injury.
- 5) Provide guidance for UK HSE and/or USA and/or Malaysia OSHA standards required health and safety training.

Employees have the authority to:

- 1) Identify and report potential hazards that may cause injury or illness to themselves or others.
- 2) Stopping any operations when there is reason to believe a potential hazard exists that may cause injury, illness, or damage to property.

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- 3) Employees shall be required to attend all health, safety and environmental training sessions and shall comply with the policies and procedures of the Health and Safety Program.
- 4) Employees shall immediately report any occupational injury/illness or exposure to hazardous/toxic materials to the Supervisor or designee.
- 5) Only qualified employees, those individuals that have been trained, shall be able to operate and inspect equipment/materials as it pertains to their work responsibilities.

4 REQUIREMENTS

- 1) This Health and Safety Program shall meet or exceed the requirements of:
 - a. OSHA, 29 CFR 1910
 - b. OSHA, Malaysia - <http://www.dosh.gov.my/index.php?lang=en>
 - c. HSE UK - <http://www.hse.gov.uk/index.htm>
- 2) Copies of the Health and Safety Requirements Manual shall be issued to the appropriate Management personnel.
- 3) The OSHA Notice, OSHA Act, UK HSE Health and Safety Law poster shall be posted on the company bulletin boards.
- 4) The OSHA Log or RIDDOR (annual tabulation of recordable injuries) shall be posted at the main office and the assembly shop from February 1 through March 1 each year.
- 5) Any employee who believes that there is a condition or practice which they consider hazardous to their safety or health, or which they believe is in violation of prescribed standards shall report the condition Management personnel.

5 TRAINING

QHSE will be responsible to train shop personnel in record keeping and worked hours.

6 RECORDKEEPING

- RIDDOR, <http://www.hse.gov.uk/riddor/when-do-i-report.htm>
- OSHA form 300, 300a, and 301 shall be updated at every incident occurrence. <https://www.osha.gov/recordkeeping/RKforms.html>
- Worked hours shall be recorded every pay period.
- Records will be retained for 5 years.


Approved by:

Signature: *Patrick McCarthy*
Patrick McCarthy (Nov 2, 2015)

Date: Nov 2, 2015


Printed Name: Patrick McCarthy

Title: C.E.O.

	Document Title:	General Policies
	Document No.:	QHS-0000-QA-PY-0007R02
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02	Scope and New CEO's Signature	02 Nov 15	DMS	DMS	PM
01	Frist release	06 Oct 14	DMS	AMC	DMS
A	Frist Draft - Informational	23 Jul 14	DMS	AMC	DMS

Use the Revision numbering convention referenced in the Document Control Procedure.

	Document Title:	Health and Safety Policy
	Document No.:	QHS-0000-HS-PY-0001R03
	Department:	QHSE

HEALTH and SAFETY POLICY

It is the company's philosophy that all incidents are preventable. This management philosophy includes Health and Safety as a company core value. As such, this vision is shared with our customers, contractors and suppliers to ensure that our operations are focused to prevent incidents from occurring. Management is committed to providing employees a safe and healthful workplace and it is this company's policy that:

- Health and Safety in our company is a fundamental part of every operation. The Health and Safety of every employee is a high priority and it is every employee's responsibility at all levels to follow the established company health and safety programs that are compliant with local and international laws and regulations.
- Management accepts responsibility for providing proper training, equipment, and education to guide and enable our employees to perform the roles and responsibilities involved with their job functions.
- Management has set Health and Safety goals and objectives to achieve superior performance through continued improvement processes that identify, assess, monitor, review and control potential impacts to our business activities.

Health and Safety will only be achieved through teamwork. Everyone must join together in demonstrating the proper attitudes towards prevention and to promote health and safety by taking every reasonable measure to assure safe working practices in the company.


Approved by:

Signature: 
Patrick McCarthy (Nov 2, 2015)

Date: Nov 2, 2015


Printed Name: Patrick McCarthy

Title: C.E.O.

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03	New CEO's Signature	02 Nov 15	DMS	DMS	PM
02	Revise bullet two and change Safety & Health to read Health and Safety for document consistency	18 May 15	DMS	AMC	DMS
01	First issue	28 Jul 214	DMS	AMC	DMS

Use the Revision numbering convention referenced in the Document Control Procedure.

	Document Title:	Quality Policy
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QUALITY POLICY

We are committed to provide quality integrated process & service solutions to the global oil and gas industry. To meet our commitment and ensure our client's continued success, ProSep will:

- Maintain a global Quality Management System in accordance with ISO 9001
- Maintain a company culture focused on flawless execution in everything we do
- Continually review and monitor company objectives and business process development


Approved by:

Signature: 
Patrick McCarthy (Nov 2, 2015)

Date: Nov 2, 2015


Printed Name: Patrick McCarthy

Title: C.E.O.

	Document Title:	Quality Policy
	Document No.:	QHS-0000-QA-PY-0001R03
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03	New CEO signature	02 Nov 15	DMS	DMS	PM
02	Revise bullet 2 and 3	30 May 15	DMS	AMC	NP
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Use the Revision numbering convention referenced in the Document Control Procedure.

	Document Title:	Ethics Policy
	Document No.:	QHS-0000-QA-PY-0004R03
	Department:	QHSE


ETHICS POLICY

ProSep conducts its business fairly, impartially, in an ethical and proper manner, and in compliance with all applicable laws and regulations. ProSep is committed to engaging in its business based on the values and principles embodied in its Mission Statement and Core Values. ProSep employees and board members shall uphold the highest standards of ethical, professional behavior and dedicate themselves to carrying out the mission of the organization.

The Board of Directors and management team are responsible for ensuring that appropriate procedures and training programs to carry out this responsibility are in place and in use. All ProSep employees have a duty to adhere to this policy.

In accordance with this policy ProSep will:

1. Demonstrate active safety, health, and environmental leadership in the performance of our professional duties and communication of this policy.
2. Treat all persons, regardless of sex (including gender reassignment), gender, sexual orientation, marital status, civil partnership status, race, color, religion or belief, veteran status, age, nationality, ethnic or national origins, genetic information, nor disability, part-time, or fixed-term status unless these last conditions can be objectively justified, with respect and consideration.
3. Comply with all applicable laws, regulations, and professional codes of practice.
4. ProSep will not give or receive gifts, bribes, or facilitation payments and will not use agents or contractors to avoid compliance.
5. Require all employees and contractors to act in such a manner as to uphold and enhance personal and professional honor, integrity and the dignity of the profession.
6. Recognize that the chief function of ProSep at all times is to serve the best interests of our stakeholders in a professional manner.
7. Respect the structure and responsibilities of the Board of Directors, provide them with facts and advice as a basis for their policy-making decisions, and uphold the governance as directed by the Board.
8. Conduct organizational and operational duties with positive leadership exemplified by open communication, creativity, dedication, and compassion.
9. Collaborate with and support other professionals and professional bodies in carrying out our mission.
10. Build professional reputations on the merit of services and never compete unfairly with others.
11. Issue statements or reports to our staff members, stakeholders and the media that are correct, timely, and not misleading. We will keep our employees and other stakeholders informed about issues affecting them and the community.
12. Ensure that corporate performance is monitored and reported at all levels.
13. Produce accounting documentation that conforms to relevant regulatory guidelines, accounting principles, and legal requirements.
14. Avoid any interest or activity that is in conflict with the conduct of our professional duties.

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15. Respect and protect privileged and/or confidential information to which we have access in the course of our professional duties.
16. Ensure that employees undertake a recorded program of professional development that develops their commitment to professional conduct in accordance with this policy and fosters professional excellence.

In accordance with this policy, ProSep employees will:

1. Not engage in conduct or activities that may raise questions as to ProSep's honesty, impartiality, reputation, or otherwise cause embarrassment to the Company.
2. Avoid any action, whether or not specifically prohibited in Company policies & procedures, which might result in, or reasonably be expected to create an appearance of:
 - a. Using public office or position for personal gain.
 - b. Giving preferential treatment to any person or entity.
 - c. Losing impartiality.
 - d. Adversely affecting the confidence of the public in the integrity of the Company.
3. Exercise the responsibility to ask questions, seek guidance, report suspected violations of this policy, and express concerns regarding compliance with this policy.

1 GENERAL POLICY APPLICATION

1.1 Gifts, Favors, and Payments on behalf of ProSep

Gifts, favors, and payments may be given to others at Company expense, if they meet all of the following criteria:


1. They are consistent with accepted business practices.
2. They are of sufficiently limited value and in a form that will not be construed as a bribe or payoff.
3. They are not in violation of applicable law and generally accepted ethical standards.
4. Public disclosure of the facts will not embarrass the Company.

Payments, commissions, or other compensation to, or for the benefit of employees of customers (or their family members or associates) not required by written contract, are contrary to ProSep policy.

1.2 Gifts, Favors, Entertainment and Payments Received by ProSep Employees:

ProSep employees shall not seek, nor accept for themselves or any other individuals, any gifts, favors, entertainment, payments without a legitimate business purpose, nor shall they seek or accept personal loans (other than conventional loans at market rates from lending institutions) from any persons or business organizations that do, or seek to do, business with, or is a competitor of the Company. In the application of this policy:

1. Employees may accept, for themselves and members of their families, common courtesies usually associated with customary business practices. These include, but are not limited to:
 - a. Lunch and/or dinner with vendors, sometimes including spouses, as long as the invitation is extended by the vendor and representatives of the vendor are in attendance.


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- b. Gifts of small value (\$25 maximum) from vendors such as calendars, pens, pads, knives, etc.
 - c. Tickets to events (such as sports, arts, etc.) are acceptable if offered by the vendor and the vendor accompanies the employee to the event. These are not to be solicited by the ProSep employee and must be approved by the appropriate ProSep manager.
 - d. Overnight outings are acceptable under the condition that individuals from either other companies and/or the vendor are in attendance. The employee must have prior approval from the appropriate ProSep manager.
 - e. The receipt of alcoholic beverages is discouraged.
 - f. Gifts of perishable items usually given during the holidays such as hams, cookies, nuts, etc., are acceptable.
2. A strict standard is expected with respect to gifts, services, discounts, entertainment, or considerations of any kind from suppliers. Examples include, but are not limited to:
 - a. Day outings such as golf, fishing, and hunting are acceptable with prior approval from the appropriate ProSep manager. The vendor must be in attendance and participation by the employee's family members is not acceptable.
 - b. Use of vendor's facilities (vacation homes, etc.) by ProSep employees or families for personal use is prohibited. In the event that the vendor is present for the duration of the visit, such a situation is acceptable as long as it is only once annually and for a limited duration, i.e. a long weekend. The employee must have prior approval from the appropriate ProSep manager.
 - c. It is never permissible to accept a gift in cash or cash equivalent such as stocks or other forms of marketable securities of any amount.
 3. ProSep management employees should not accept gifts from those under their supervision of more than a limited value (\$25 maximum).

1.3 Conflicts of Interest:

ProSep employees should avoid any situation that involves, or may involve, a conflict between their personal interest and the interest of the Company. As in all other facets of their duties, employees dealing with customers, suppliers, contractors, competitors, or any person doing, or seeking to do, business with the company are to act in the best interest of the company. All ProSep employees shall make prompt and full disclosure in writing to their manager, of any potential situation that may involve such a conflict of interest. These include, but are not limited to:

1. Ownership by a ProSep employee, or a member of their family of a significant interest in any outside enterprise which does, or seeks to do, business with, or is a competitor of the company.
2. Serving as a director, officer, partner, consultant, or in a managerial or technical capacity, with an outside enterprise that does, or is seeking to do, business with, or is a competitor of the company. The Chief Executive Officer of ProSep must approve exceptions to this requirement.
3. Acting as a broker, finder, go-between, or otherwise, for the benefit of a third party, in transactions involving, or potentially involving, the Company or its interests.
4. Any other arrangements or circumstances, including family or other personal relationships, which might dissuade the ProSep employee from acting in the best interest of the company.

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1.4 Confidential Information

The revelation of, or use of, any confidential product information, data on decisions, plans, or any other information which might be contrary to the interest of the Company without prior authorization, is prohibited. The misuse, unauthorized access to, or mishandling of, confidential information, is strictly prohibited and will subject an employee to the Corrective Action Program, up to and including immediate termination of employment.

1.5 Compliance

Any violation of this policy will subject the employee to the provisions of the ProSep Corrective Action Procedure. Any ProSep employee having knowledge of any violation of this policy shall promptly report such a violation to the appropriate level of Company management. Each manager and company officer of ProSep is responsible for compliance with this policy. When questions arise concerning any aspect of this policy, please contact the Office Manager.

ProSep will continue to communicate its commitment to integrity and uncompromising values to all employees. The program will inform staff members of all of the policies and procedures regarding ethical business practices and conduct and assist them in resolving questions about issues and how to report suspected violations of this policy. Retaliation against employees who use the reporting mechanisms to raise genuine concerns will not be tolerated. The Office Manager shall be responsible for providing policy guidance and issuing procedures to assist staff members in complying with the Company's expectations of ethical business conduct and uncompromising values. The need to respect cultural differences must be carefully investigated and evaluated at all times while taking care not to engage in improprieties. This policy outlines the standards of such conduct required of all ProSep employees. Managers are responsible for supporting their direct report(s) in complying with this policy's requirements and monitoring such compliance.


Approved by:

Signature: *Patrick McCarthy*
Patrick McCarthy (Nov 2, 2015)

Date: Nov 2, 2015


Printed Name: Patrick McCarthy

Title: C.E.O.

	Document Title:	Ethics Policy
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Use the Revision numbering convention referenced in the Document Control Procedure.


	Document Title:	Environmental Policy
	Document No.:	QHS-0000-EV-PY-0001R02
	Department:	QHSE

ENVIRONMENTAL POLICY

In ProSep we are conscience of the effect that onshore and offshore operations may have on the environment. We strive towards zero environmental footprint by conserving, restoring and replacing the natural resources used in its operations.

This is achieved by monitoring our environmental process performance and driving continued improvement of these processes through training, compliance to local laws and regulations, and striving for more efficient utilization of resources.


Approved by:

Signature: 
Patrick McCarthy (Nov 2, 2015)

Date: Nov 2, 2015


Printed Name: Patrick McCarthy

Title: C.E.O.

	Document Title:	Environmental Policy
	Document No.:	QHS-0000-EV-PY-0001R02
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02	New CEO's Signature	02 Nov 15	DMS	DMS	PM
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Use the Revision numbering convention referenced in the Document Control Procedure.

	Document Title:	Housekeeping Policy
	Document No.:	QHS-0000-HS-PY-0005R02
	Department:	QHSE

HOUSEKEEPING POLICY

ProSep strives to provide a comfortable working environment and encourage all employees to enjoy and make use of the common areas provided. Employees' contribution to help maintain their personal work area and general office areas (kitchen, supplies room, etc.) will ensure an attractive and safe work environment. Employees are expected to treat common areas with respect and ensure that they are left in a tidy state.

This policy applies to all employees, visitors, and contractors at ProSep. All materials, products and equipment have a place for orderly storage at ProSep. Employees are to return items to its proper place after use to ensure they are easier to find for others to use and easier to inspect for damage and wear.

A widely used methodology of implementing a philosophy of organizing and managing workspace and workflow is called "5S". This stands for: sorting, straightening or set in order, shining, standardizing, and sustaining. This philosophy suggests if these 5 guidelines are followed, the workplace and workstation will stay tidy to keep the employee efficient and effective while remaining safe.

Employees should tidy their workstation at the end of each workday, to ensure their space is safe for use, to aid others in locating materials, to ensure effective controls in maintaining document confidentiality, and to maintain a professional image of ProSep. Only files currently being worked on should be on a desk or tools currently required are on the workstation; all other files or tools should be put away in the proper filing/storage area.

Employees are collectively responsible for maintaining the cleanliness of common office areas. When using any common space (i.e. kitchens and washrooms) all employees are expected to clean anything that they use, put garbage in the garbage receptacles. Should anything need repair or replacement, please notify your Manager immediately.

Employees are to follow the direction of all signage posted in common areas to ensure compliance with the fire code, room capacities, and health and safety regulations to guarantee a safe and enjoyable experience for all.

It is everyone's responsibility to pick up and clean up. Here are a few guidelines:

1. Keep work areas and storage facilities clean, neat and orderly
2. Keep all aisles, stairways, traffic areas, and exits free from obstructions at all times
3. Clean up any spills, trip and fall hazards immediately
4. Do not allow unneeded materials or supplies to accumulate. If unused, get rid of it.
5. If items are missing, misused, or if an area has been defaced, please report these actions to your Manager immediately
6. All common areas are to be treated with respect. Please tidy up any garbage, wash dishes as needed, etc. to help maintain a clean environment in which to work.

Violations of this policy will be subject to appropriate disciplinary action.


Approved by:

Signature *Patrick McCarthy*
Patrick McCarthy (Nov 2, 2015)

Date: Nov 2, 2015

Printed Name: Patrick McCarthy

Title: C.E.O.

	Document Title:	Housekeeping Policy
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