

CLEAN ALL ENVIRONMENTAL SERVICES LIMITED

International Maritime Organisation (MARPOL 73/78) Compliant Company of the

NIGERIAN PORTS AUTHORITY



WORKING MANUAL

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INTRODUCTION

Cleanall Environmental Services limited was specifically incorporated to meet the environmental challenges and pollution.

As providers of integrated environmental solutions in the maritime sector, the company initiated public private sector partnership for management of pollution in 2001 at the Nigerian Ports Authority.

With the seeming agitation for a cleaner environment and proper management of waste generated vessels plying the Nigerian coastal waters, the company capitalized on existing local and international regulations to drive its projects

The issue of safety in all endeavors has assumed greater prominence in recent years the world over. It is an established fact that the application of strict safety procedures and practices is the only panacea to accident fraught operations.

Most human activities carry special risk which could result in personal injury and property damage. It is an axiom of accident preventing that all accidents have causes and a further act of faith that the great majority of them are preventable.

Unsafe acts in any business frequently lead to loss of property, injury to staff, loss of man-hours, risk to health or death.

Our company in realization of the above dangers initiated, and has continuously upheld the highest degree of commitment to safe working measures by staff and other persons dealing with us.

PRINCIPLES

- A job is well done only when it is carried out safely.
- All accidents and injuries can be prevented.
- Safety must never be sacrificed for the sake of expediency
- Safety is equal to production and drilling in importance
- Achieving Safe operations is a number one priority.
- Safety is everybody's business.

SCOPE

It is to further strengthen above resolve that management directed its safety policy and manual to be documented and that they should address all fundamental issues concerning the company.

This document is therefore expected to provide the advocacy that is needed to inculcate safety consciousness in all company staff as they carry out their individual and collective assignments.

This manual sets out the responsibilities involved in implementing safety procedure on the worksite. It also presents records and procedures for identifying causes of accidents and

reporting systems that are to be maintained on the projects with the understanding that accidents do not suddenly happen; they are caused by unsafe acts or unsafe condition.

This document shall be used as a baseline for implementing and enforcement of the Company's projects and shall be amended, where necessary, as new standards are adopted and when the client's safety specifications exceed the company's policy.

Our company will always contact the Supervising/Unit and Loss Prevention for guidance if in doubt of any safety or environmental procedures.

Management hopes that this effort and its full utilization would yield expected results.

CASHES (Community affairs, Safety, Health, Environmental & Security) POLICY

The management of **CLEANALL ENVIRONMENTAL SERVICES LTD.** shall ensure the safety of its employees and the public by ensuring that our operations are based on sound technological background, environmentally-friendly and will ensure sustainable development. Our mission is to be a socially-responsible organization rendering value-added service to our clients and in our resolve to achieve this mission we shall keep a motivated workforce.

The board of directors of this company **CLEANALL ENVIRONMENTAL SERVICES LTD.** regards the promotion of health and safe measures as a mutual objective for management and employees at all levels.

It is therefore this company's policy to do all that is reasonable to prevent personal injury and damage to property and to protect everyone from the foreseeable work hazards including the public in so far as they come in contact with the company it's products and services. All operations shall be carried out with the greatest regard for the health and safety of all workers.

Management believes that safety and efficient production go hand-in-hand. Every effort will be made to prevent injury to our employees by taking all possible steps to improve working conditions and practices. In order to ensure the safety of our workers, the company has developed this health and safety program manual with company policies and procedures that everyone must follow at all times. To enforce these procedures, management will make routine checks of the work site.

Cleanall Environmental Services as a company functions in full conformity with all safety laws, regulations, codes and standards applying to operations to ensure the safety and protection of all those working in our operations. All workers are also expected to comply with the law and company job requirements.

Our incident prevention program must have the cooperative efforts of both sides: the workers and management in order to be successful. Everyone must help recognize and eliminate hazards as they are found. With the daily commitment and support from everybody, we can work together as a team to reduce job hazards and maintain an efficient and safe operation.

In particular this company has a responsibility:

- To provide and maintain safe and healthy working environment and conditions, taking account of any statutory requirement of our client and the national regulatory agencies.
- To provide training and instruction to enable employees to perform their job safely and efficiently.
- To make available all necessary safety devices and protective equipment and to supervise their use.

- To maintain a constant and continuing interest in health and safety matters application to the company's activities, in particular by consulting and involving employees and clients where ever possible.

Employees have a duty to cooperate in the operation of this policy:

- By working safely and efficiently.
- By using protective equipment provided, and by meeting statutory obligations.
- By reporting accidents/incident that have led or may lead to injury or damage.
- By adhering to company procedures, jointly agreed on their behalf, for securing a safe workplace.
- By assisting in the investigation of accidents with the objective of introducing measures to prevent a recurrence.

BASIC COMPANY RULES

WORK ETHICS

- Company policy is generated from the topmost hierarchy of the company in this case the Management Board.
- All policy statements of the company originate from the office of the Managing Director.
- The company observe a lot of good working relationship with sister companies.
- Respect and mannerism is a sine-quo-non demeanor of all staff as strict discipline is inculcated in the staff.
- Since the working area of the company is the sea, good internal brotherly relationship is encouraged among the staff as quarrels might lead to fighting.
- It is forbidden for two staff to fight in the work environment.
- The staff maintain very high respect and good working relationship with our immediate supervisors the Health Safety and Environmental department of the Nigeria Ports Authority.
- Due to the nature of our job, we work 24 hours of the day maintaining a two-shift system because pollution can happen any time.
- Since it is Essential Services, the company does not observe Sunday and public holidays. Invariably, we work 7 days a week and 365 days a year.
- In major pollution incidents, the staff is mandated to get involved in oil spill contingency with other stakeholders to contain and salvage the situation.

WORK PLAN

We go on land and sea in which we monitor tank firms with a view to preventing leakage from the firms into the sea. We also monitor coastal companies with a view to preventing their effluent getting into the sea. We therefore engage in the following:

- Workers are posted to tank firms for daily monitoring of their coastal environment.
- Company maintains operational vehicles that convey the staff to various jetties and tank firms.
- Cleanall Environmental Services has sea worthy boats that patrol the navigational districts of Warri and Calabar with personnel.
- Personnel that carry out surveillance carry electronic gadgets like infra red cameras, binoculars, GPS equipment, solar panel on board, walkie-talkie, video camera, photo camera, cell phones.
- There is also on board petro flag tool box for the analysis of oil samples.
- The company uses electronic means to monitor pollution in which such electronic beacon with leak wise oil on water detection and monitoring system 1D-220 is used.
- The beacon is deployed in strategic locations of the navigation district for effective coverage.
- The electronic oil monitoring equipment sends signal to a centralized head office for information gathering on oil pollution.

- Cleanall environmental services also scoops off the sea minor garbage like floating bottles, plastics and corks.
- For safety purposes long arm scooping nets are used.

EQUIPMENT AND VEHICLE MAINTAINACE

The ID-227 WL Oil Sheen monitoring is a wireless device installed in the marine environment with the ID-220 series. The maintenance culture Cleanall has formulated is based on the purchase agreement with the manufacturer's general electric in which the manufacturers take to service the equipment on a quarterly basis.

Company electronic gadgets: These are mainly hand held gadgets and are serviced periodically especially in trouble shooting times.

Operational vehicles: The operational vehicles are periodically serviced predominantly determined from mileage run. They are serviced by company on after-sale service agreement.

COMMUNICATION SYSTEM

Information is a core aspect of the Cleanall modus-operandi. We maintain a communication outfit in which the company uses walkie-talkie and radio communication systems, cell phones and ID-220 series information relay. All our operations are linked by wireless communication systems.

TRANSPORT

- Only authorized Cleanall Staff should drive company vehicle. Regular maintenance checks should be carried out on the vehicles. Staff should be encouraged to drive safely and there should be training in safe driving technique.
- Road Transportation: Company drivers must be qualified to drive the particular type of vehicle they are assigned. Company vehicle should only be used for company business and their use authorized by supervising officer. Unauthorized passengers carried in the company vehicle should be prohibited. It should be compulsory that seat belts are used. Fire extinguishers and first aid kits should be provided in Cleanall company vehicles.
- Drivers' Induction: Company Policy is to recruit only qualified and experienced drivers who will be trained and re-trained in areas of security, fighting fire, first aid, road signs, regulations etc.

THE STAFF

The company has the flair for being choosy on quality of staff as virtually all her staffs are graduates, qualified engineers and scientists. Some foreign experts in the field of marine pollution and administration complement the staff list of the company.

Trained and experienced Pilots man for the surveillance boats. The able sea men are trained divers and quarter masters.

STAFF TRAINING

General company health and safety training

The company shall communicate all company policies to all employees at time of hire and again during annual refreshers.

Key company CASHES policy include:

1. Safety legislation on rights and duties of workers, supervisors, employers, including potential fines for workers from Ministry of Labor
2. Company health and safety policy and general rules
3. Emergency response procedures
4. Lockout and guarding policies
5. Sprain and strain prevention procedures
6. Role of the health and safety representative or JHSC
7. License requirements
8. Safe operating procedures
9. Any other pertinent policies at that time.
10. Whenever a health and safety policy or procedure is changed significantly, those affected will be retrained on the new policy or procedure.
11. All policy communication or training will be documented, including date and time, topics covered, attendance, and comments or concerns brought forward.

Job-specific training

New employees (or existing employees transferred to a new job) will be trained in the standard operating procedures (SOPs) for that job. They will also be asked to sign off on the SOP indicating they understand the requirements. The signed copy will be kept on file and the worker will get a copy.

Copies of all SOPs will be available in the health and safety program manual for all employees to review as needed.

SOPs will be reviewed and revised as needed, but at least once every year, and with worker input.

Supervisor responsibility and training

Supervisors are given special obligations under the Occupational Health and Safety Act (OH&S Act) and Ontario Regulation 851 for Industrial Establishments (Regs). Supervisors have responsibilities and duties for the safety of workers and can be severely penalized for non-compliance. Supervisors have authority over a worker and the workplace and can discipline workers to ensure they work safely. They must also be competent (as defined in the OH&S Act) and knowledgeable of the information in the matters listed below. Each supervisor will have his or her own copy of the OH&S Acts and Regulations.

Must be knowledgeable of the following portions of the OH&S Act and Regulations:

- Employer, Supervisor and Worker Responsibilities – OH&S Act sections 25, 26, 27, 28

- Competent Person Definition – OH&S Act section 1(1)
- Work Refusal – OH&S Act, section 43
- Critical Injury Definition – Regulation 834
- Ministry of Labor Powers – OH&S Act, sections 54, 55, 56, 57
- Penalties for Individuals and Corporations – OH&S Act sections 66 (1), (2)
- Health and Safety Representatives Powers and Responsibilities – OH&S Act, section 8
- Regulation for Industrial Establishments – all pertinent sections for the operation.

Supervisors have basic legal and due diligence responsibilities to ensure worker safety as follows:

- Every precaution reasonable under the circumstances is taken for the protection of the worker.
- Action is taken immediately upon any reports of unsafe or hazardous conditions or situations.
- The supervisor will review the company's health and safety program regularly and make changes as needed.
- Provide instruction/coaching to workers to ensure they work safely.
- Make sure workers have been advised of any actual or potential hazard that the supervisor is aware of.
- The workplace is inspected on an ongoing basis to ensure the required safety measures and/or procedures are being followed.
- Conduct regular employee meetings where concerns, safety rules, policies and procedures are discussed, including one-on-one instruction.
- The supervisor will record any safety-related matters in a daily journal for future reference.

Supervisors must also know their responsibilities in all company health and safety policies, including:

- Responsibilities in case of fire, injury or incident
- Responsibilities for health and safety training of new employees
- Responsibilities involving hazard recognition programs and reporting
- Lockout and guarding policy requirements
- Safe operating procedures for all jobs in the workplace.
- After reviewing the information above, each supervisor must sign below to indicate that he/she understands his/her responsibilities and will carry them out to the best of his/her ability with the resources given to him/her.

Training of personnel

- Swimming is a requisite for hiring a staff although operational staffs of the company are trained to be good swimmers.
- The able sea man is trained to be a good diver hence he is equipped with divers' suit.
- The operational staffs are trained to be able to use fire extinguishers, sand bags and sand buckets.

- Every staff of the company under goes a company course on pollution, oil spill, oil spill containment, Emergency spill response, prevention of oil spill, Effect of oil spill and garbage dumping in the sea.
- The staffs also go through training in the use of minor oil spill salvage equipment like Sorbents, Dispersants and Skimmers.
- There is a compulsory course in surveillance where the staff learns what constitutes pollution, and recognition of oil types.
- Staff can recite the annexes of Marpol 73/78 off heads.
- The staff also trained to approach polluting ship very cordially.
- Proper training are given for the handling of electronic gadgets like the photo camera, video camera and infrared camera as they become very useful in cases of litigation as these portray very veritable evidences.
- A compulsory training on the methods of reporting pollution incidents is very necessary, in which the staff will learn the difference between oil types, sheen oil and sleek oil.
- The staff also can determine with a trajectory diagram the possible epicenter of oil pollution, direction and shore – line setting.

ENVIRONMENTAL HEALTH HAZARDS AND CONTROLS

The supervisor will discuss possible environmental health concerns with all employees. Environmental health concerns can include:

1. Chemicals in the form of gases, mists, dust, fumes and vapours
2. Biological hazards such as bacteria, viruses, fungi, and other living organisms
3. Physical hazards such as excessive noise, vibration, light (snow blindness), and radiation
4. Cold and heat stress.

The most recent assessment of environmental health hazards in this operation has identified the following list of health hazards:

1. Diesel fuel
2. Gasoline
3. Etc.

Controls have also been developed for each, and a monitoring process to determine the extent of exposure and compliance to threshold limit values, if any.

FIRST AID AND MEDICAL

At least 1 and up to 3 employees will have their Standard First Aid Certificate. The names, work locations and expiry date of those with a First Aid Certificate will be included in the main first aid kit, as will a copy of the Workplace Safety and Insurance Board (WSIB) First Aid Regulation 1101 and the WSIB Form 82 poster (“1, 2, 3, 4” poster).

A 6-15 person first aid kit will be in located in the vehicles. Smaller kits may be found in some equipment or vehicles.

The first aid kit will be inspected for sufficient contents (as per Regulation 1101) at least quarterly by the supervisor or a designate. The card in the kit will be signed and the supervisor will replenish missing items.

Injuries requiring the use of first aid supplies will be documented as per the Incident Investigation Policy.

- A medical clinic for prompt medical attention, in case of any serious injury, shall be provided at the locality.
- Qualified medical attendants shall be available for advice and consultation on matters of occupational injury.
- A certified first aider shall be available at site to offer first aid treatment before calling on a doctor on serious and minor cases.
- A first aid room shall be identified by a first aid sign.
- Approved first aid drugs shall be stored in an identified box.
- Transport shall be made available for injured employee to Hospital
- Telephone numbers of Physicians, Hospital and Ambulances shall be consciously posted.
- The company Safety Officer shall develop and distribute written information relating to medical treatment and emergency evacuation procedures for site project.
- Accident report shall be made available to Mobil Producing Nigeria Unlimited as required by MPNU Loss Prevention Procedure Manual.

BASIC SAFETY RULES

SAFETY RULES FOR BOAT OPERATION

- The pilot is the chief officer in charge of the boat.
- He works with his able sea man.
- The pilot and the able seaman keep to the neatness of the boat.
- At the beginning of each day's operation, the pilot observes safety procedures.
- The deck of the boat is cleared of any obstacles to prevent tripping and falling into the water.
- There should be no inflammable matter in the boat.
- The batteries of the vessel are well connected and spaced to avoid spark.
- There is a routine maintenance of the boat carried out by GLOSO Marine every month to keep the boat in perfect sea worthy condition.
- As a surveillance boat, the vessel is covered so as not to expose the surveillance officers to the harshness of the weather.
- The vessel is fitted with navigational gadgets like compass, horn, lighting system.
- The boat has bilge pump and sewage pump for the usage of the personnel on board as this is a far going vessel.
- There are fire service extinguishers
- Sand buckets and sand bags are kept in secluded areas of the vessel and are routinely checked and refilled.

- All boat landings should be equipped with two ropes for the use of the personnel winging off and on the boat.
- It is usually the able-seaman that should be responsible for using the ropes to wing off and on the boat.

STAFF SAFETY

- Staff must all appear in protection clothing and gear.
- Staff are usually conveyed from our muster point to the Port
- Staff must put their port pass as identification against unwanted entry into the port.
- All the company protective clothing must have Cleanall identification barges conspicuously displayed.
- Staff is not allowed to take food or food materials into the vessel.
- Standard divers' suit is always available in the boat and the able seaman in versed in diving.
- Nose mask must be worn in oil spill environment to prevent the inhalation of petroleum vapors.
- All contact with petroleum products must be avoided as they taint and corrode the skin.

PERSONAL PROTECTIVE EQUIPMENT

- Helmets of hard texture are worn to cover the head.
- In oil spill, salvage protective eye goggles are to be worn.
- Footwear is compulsory and the type put on is oil resistant.
- Coverall: Well-tailored coverall in worn.
- Rubber hand gloves are worn only in cases of oil spill salvage.
- Life buoy jacket is put on before embarking on any seaward journey.
- Divers' suit: This is usually kept in a compartment of the vessel in case of detection of leaking oil from undersea pipe, sunk boat etc.

SAFETY INSPECTIONS PROGRAMMES

It is the responsibility of Company management to monitor the different areas and initiate inspections. Inspections should be carried out at quarterly intervals, with remedial actions being reviewed by **CLEANALL ENVIRONMENTAL SERVICES LTD.** Safety Management and discussed at Safety Committee meetings. Company office staff inspections should take the form of a Safety Check List covering the key points required to reduce hazards, and assist in maintaining a safe working environment. The areas covered by CLEANALL ENVIRONMENTAL SERVICES LTD. offices safety inspection includes:

- Accident Statistics
- Safety Procedures
- Safe Working Practices
- Equipment
- Premises
- Roles and Responsibilities
- Statutory Requirement
- Company Policy and

- Clients

Safety inspection is an important measure applied by the Company to curb unsafe practices generally observed among workers at work site.

Wear and tear is unavoidable conditions for a mechanical change which may result in environmental hazards e.g. Spillage, Electrocution, etc.

Periodic inspection of operations and operators including operational areas enhance the following:

- Identification of causes of accidents.
- Self confidence during operations.
- Mechanical conditions.
- Work Permit Compliance
- Advise on work procedures.
- Supervising for safety.

AUDIT PROGRAMME, AUDIT SCOPE AND FOLLOW-UP

CLEANALL ENVIRONMENTAL SERVICES LTD. safety management performance can be audited using the same techniques as applied for auditing other aspects of its business. Essentially, auditing is a verification of management control in a certain subject using a systematic sampling approach. The audit should identify weaknesses in relation to specific safety controls which many lead to unacceptable risks.

Occupational safety audit will identify strengths and weaknesses in areas such as:

- Compliance with regulations and company safety policies.
- The implementation of occupational safety/health program to ensure adequate identification, evaluation and control of all safety/health matters.
- Communication and training program on safety/health matters.
- Medical treatment, first aid and emergency response.
- Management and technical capabilities in the area of occupational safety/health.

EMPLOYEE ORIENTATION PROGRAMME

Each new employee shall receive an introductory briefing and safety orientation before proceeding for operations. The Safety Personnel or the Supervisor will always meet with new employees prior to their commencement of work.

In practice, a one day safety briefing and safety orientation will be given to all new employees.

At the end, the orientation form will be filled, signed and returned for filing.

OFFSHORE REQUIREMENTS

Daily operations offshore involve men and materials. Possible means of transport to and from offshore locations are boats and helicopters.

Personnel travelling offshore by either means must satisfy the following requirements:

- Must have basic fire fighting experience.
- Must undergo water survival/swimming training.
- Must not be drunk and must observe "No Smoking" regulations.

- Must not carry fire arms with him.
- Must wear life jackets and ear muffs.
- Must put on safety belts while travelling in helicopters.
- Must not inflate the life jacket insider the air craft.
- Must attend comprehensive medical check-up every 24 months.
- Must not be a proven case of epilepsy or asthma or other ailments as per Doctor's recommendation.

SAFETY TRAINING PROGRAM

A proper training program shall be conducted to analyze the intricacies of the job and possible hazards involved. During the training, efforts shall make to identify psychological factors that may hinder effective operations and monitoring of trainees for compliance and implementation.

Safety training is an integral part of safety operations. The aim is to equip all personnel with skills and ideas required to perform most successfully.

Safely Training shall include:

- Safety Orientation.
- Specific training based on job at hand.
- Basic First Aid.
- Basic fire Fighting and prevention.
- Health and Safety Training.
- Emergency Response.
- 10. Other relevant training and courses as required.

All training shall be recorded.

SAFETY MEETING PROGRAM

A successful safety meeting should be everyone's concern. The Supervisor's Safety Meeting is the focal point for Setting Standards, Establishing Safety Policies, Solving Problems, initiation of new safety plans and accountability.

Each worker is of great value to both management and workforce. Other meetings are tool box meeting, pep-talks, Weekly Review Meeting for effective performance.

During projects, safety meetings shall be conducted by Supervisors or Safety Personnel at their respective units. Issues like the current safety problems and their possible solutions, new rules and regulations can be outlined and implemented as necessary.

SAFETY AWARENESS PROGRAM

Each employee is part of a work team whose aim is to execute each project

SAFELY AND EFFICIENTLY

The experts in Safety Management design posters and slogans in an effort to create safety consciousness among the works.

Analysis of the type of accident associated with a particular job will also reveal specific hazards that are likely to be encountered. Such awareness and others prevent accidents and consequently promote safety at work site.

RISK MANAGEMENT AND CONTROLS

Risk Management is a term applied to the whole process of risk estimation, evaluation, reduction and control. We consider risk management in phases, each incorporating a potential number of actions, with respect to the project involved.

The purpose of risk management include:

- To control and reduce risks to the barest minimum or acceptable levels.
- To reduce uncertainties in risk involved in the task.
- To increase the public confidence in risk related job under control.

SECURITY

Most Company's interest is in maximizing profits. Such Company's policies conflict with the security goals are target for property. Our priority is the safety and security of our personnel and equipment.

These include:

- Identification of personnel and property.
- Insuring personnel life and material.
- Taking care of tools, material and equipment.
- Identifying and maintaining
- Allowing only authorized personnel entry to storage and material warehouse.

GENERAL SAFETY INSTRUCTIONS

These instructions are to assist in choosing a safe course of action while performing daily job assignments and where personal judgment becomes a factor. Following the tips, hints and suggestions contained in these instructions will do much to prevent injuries.

Before starting any job, think. Seek out the hazards and take preventive actions to eliminate accidents from occurring. Proper tools and necessary protective equipment should be on the job site before starting the work. If in doubt as to the hazards involved or the proper tools and equipment to use, consult your supervisor.

Correct and/or report unsafe conditions

Tripping hazards can be caused by tools, materials, equipment leaks or spills. If they are in your area of responsibility, immediately remove the objects and stop the leaks or report them to your supervisor.

Good housekeeping

Good housekeeping as a rule indicates a safe operation. It results in fewer accidents and reduces the hazards of fire as well.

Oil spills or leaks should be cleaned up promptly or covered with oil absorbent materials and should be removed as soon as possible.

Walkways should be void of materials, tools and equipment. A job is not completed until the area is cleaned up.

Avoid breathing petroleum vapors

Avoid breathing petroleum vapors even though they are not generally regarded as being highly toxic. Over-exposure to these vapors may produce a form of intoxication. Prolonged breathing of heavy concentrations may have some serious effects. If in a gaseous area, get to fresh air at once.

Do not return unless protective respiratory device is used or the area is gas free.

The bulletin boards

One way the company communicates with employees. In addition to safety bulletins, other information will be posted. To all informed employee, observe the bulletin boards.

Safety of others

Especially new employees and visitors, is the responsibility of those employees familiar with the operations. If you see them performing an unsafe act or in a location where they are likely to be injured, inform them courteously of the hazards and how to avoid them.

Report near injuries and hazards

You can assist the company in providing safe working conditions by reporting to your immediate supervisor any unsafe conditions or practices you observe in your work. Near misses or near injury incidents reveal such conditions.

Inspect equipment and tools

Your ability to perform job safely may depend on the safety conditions of ladder, wire, rope, tool, or other equipment. It is important that they be inspected before use. If you are in doubt – DO NOT USE IT - see your supervisor.

Lift properly

To be assured that the weight is placed on leg muscles rather than smaller muscles of the back, bend your legs to get close to the object, keep the back straight, get a firm grasp, and lift by straightening the legs. If the object is too heavy for you, get someone to help you or use mechanical lifting equipment.

Handle material with care

Keep your hand and body away from pinch points and between moving object. Gloves will help prevent injury to hands and fingers and safety shoes will help to prevent injury to the foot and toe. Those working on the job have the responsibility for safe carrying and use of materials and tools.

Intoxicating liquors, alcoholic beverages and drugs

It will not be permitted on the platforms or other facilities under control of the company.

Gambling

It will not be permitted on the platforms or other facilities under control of the company.

Pressure

It must be bled off in a safe manner to atmospheric pressure prior to loosening or breaking threaded or flanged connections.

Doors

Leading to areas of differential pressure are to be kept closed. Fans are not to be shut down or reversed without proper authority.

Safety and fire prevention rules

Each employee shall comply with the following rules at all times. If a condition exists where you cannot comply with a specific rule, see your supervisor for alternate safe practices to follow:

Smoking

Smoking is not permitted except in locations specifically designated by the company.

Matches and lighters

Machines of the "strike and where" type and lighter not provided with a spring loaded cover are not permitted. "Strike anywhere" matches can be ignited by Friction on any surface or by rubbing against each other.

Hot work

To insure that fires and explosions will not occur as a result of ho1 work, a Hot Work Permit procedure has been developed which outlines the procedure to follow prior to starting any job where open flames, sparks, or other sources of ignition may create a hazard.

In addition to this procedure the following should be considered every time hot work is done.

- Covering drain openings with non-combustible material.
- Removing or protecting oil spills and other combustibles.
- Positioning a portable fire extinguisher near the work area.
- Provide a non-combustible barrier for screening of other personnel from the welding area.

The Hot Work Permit Procedure will be explained in details by your supervisor and then posted at conspicuous locations.

Maintenance work - work permit required

Company employee and or the Heart land representative in charge of contracts personnel who are to work within the limits of a defined process are of utility section, must report to the supervisor operator in charge of the unit/area and obtain a work permit before any work is begun.

The operator signing the work Permit shall conduct the operations so as to provide continued safe conditions for personnel working in his area of responsibility.

When the work is completed, the work Permit is to be immediately returned to the operator in charge of the Unit/area for sign-off signature indicating that the work is completed, area is cleaned and the Work Permit is cancelled.

The Work Permit procedure will be explained in detail by your supervisor and posted at conspicuous locations.

Starting-stopping machinery

Unless you are specifically authorized to do so, do not open or close any valves or tamper with regular controls that could turn on or off electricity, water, gas fuel, oil, air, acid, or set in motion equipment or electrical apparatus. If authorized to do this work, make sure that no one is in a position to be injured.

It is recommended that wherever practical, machinery should be shut down before oiling, cleaning adjusting or repairing.

Tagging and locking out power sources to equipment under repair

Prior to performing work on electrically driven equipment or on the electrical system itself, the circuit is to be de-energized and the switch box, circuit breaker, state-stop switch, etc., tagged with a "Danger, Do Not Operate" tag and physically locked out by maintenance personnel performing the work. The operator or individual in charge of the area/operation where the equipment is located is to be notified in advance for authorization work on the equipment.

The procedure regulating the use of the "Danger, Do Not Operate" tag and lock out program will be explained in detail by your supervisor and posted at conspicuous locations. But, remember, no tag or lock is to be removed by anyone that did not tag or lock the equipment.

Release of hazardous material

After the equipment has been pumped out purged, flushed out, etc., and the operator/individual in charge of the equipment has issued a Work permit, personnel shall disconnect and/or blank all lines to the equipment as possible.

Blanking in is an additional precaution against a valve being inadvertently opened and permitting the release of hot, corrosive, toxic or flammable materials into the equipment where work is being performed.

The procedure regulating blanking or blinding procedures will be explained in detail by your supervisor.

Working in, entering tanks, vessels, and other confined enclosure -- requires an entry permit

No tank, vessel, or other confined enclosure shall be entered until appropriate tests are conducted and an entry permit obtained.

One man must be stationed and remain outside the vessel where he can give warning or assist in an emergency is required for additional protecting of employees working in a confined enclosure.

The prescribed respiratory equipment - protective clothing and other necessary equipment shall be worn at all times when working in these enclosures.

The entry permit procedure will be explained in detail by your supervisor.

Reporting accidents and personal injuries

All accidents and injuries sustained on the job are to be reported and given first aid treatment immediately. Delay could result in serious, disabling infections. If possible, notify your supervisor before reporting for first aid treatment.

If unable to report to work due to an injury occurring on the job, notify your immediate supervisor at once so that arrangements can be made for you to receive prompt medical attention.

Horseplay

Horseplay, fighting or wrestling are not permitted. These pastimes can result in serious injuries and could result in disciplinary action.

Working overhead

When performing work overhead, workmen below should be aware of your presence. If working above a passageway, or any other location where individuals could be endangered, suitable warnings such as barricades, and/or signs are to be used or the entire area roped off.

Do not raise/lower any material, equipment or tools from above until all precautions have been taken to provide safety to those below or passing by. In some instances, it is necessary that a ground man be stationed below to warn others.

All signs, barricades, etc., must be removed when the job is completed

Use of hand tools

The cause of many injuries results when using tools with mushroomed heads, files without handles, cracked, weakened or broken handles, nails in place of cotter keys, etc., Use only tools in good condition.

If tools become defective during use, obtain a tool in good order before continuing the work. Cheaters or snipes (extensions for wrench handles) are not to be used.

Always use the right tool for the job at hand.

Hoisting operations and equipment

Only authorized operators shall operate hoisting equipment. Hoisting equipment including blocks shall be inspected and found to be in good working order.

One employee should designate to give signals to the crane or hoist operator. The hoist operator in turn should respond only to the signals given by the individual so designated. However, obey emergency stop signal by anyone.

Always keep clear of overhead loads and warn others who come within the danger zone. Do not place hands on moving rope or cable. The desired number of tag lines should be used to guide and control the suspended load.

Personnel baskets will be provided where satisfactory hoisting equipment is available. No more than four persons will be allowed to ride the basket at one time. Stand on the outer rim and face inwardly. Place hands on netting about chest high. Work vests or life jackets must be worn during basket transfer over water. Only light personal luggage may be placed inside netting.

Barricades guards warnings

If manhole covers, valve pit covers, trench plate covers, platform sections, handrails, etc, are removed the openings shall be properly guarded.

Guards for portable tools machinery shall be in place when this equipment is in operation. If guards are removed the machinery shall not be put into operation until the guards are replaced. All I signs barricades, etc must be removed when job is completed.

Ladders

Chairs, drums, boxes, valves pipe nipples and other similar equipment shall not be used for climbing or working platforms.

Ladders are to be inspected and only those in good conditions are to be used. Legs of the ladder are to rest evenly on the base, and the ladder must be tied or held in position by another employee.

A straight ladder is to be positioned so that every four feet up, the base of the ladder is to be placed one foot away from the object against which the top is resting. For example, the base of an eight foot ladder should be two feet away from the object against which the top is resting. The top of any ladder in use shall be tied in place.

The top step of a step ladder should never be used to stand on. The third step from the top of the ladder should be the highest step used.

For safe use, wooden ladder should not be painted. Only Varnish, which permits visual inspection for defects, is permissible.

Personnel working on electrical equipment, writing etc are not to use metal ladders.

Scaffolds

Scaffolds are to be properly constructed and placed so that they do not obstruct access to walkways, exits, firefighting equipment or operating controls including emergency shutdown control.

Platforms for scaffolds should consist of at least four sound 2"x10" planks or equivalent in width and strength. Each plank must be secured to prevent it from slipping off or along the supporting member. Wiring, nailing or positive means can be used. Planking must be kept free from oil, dirt, grease etc to ensure proper footing. Wiring screening must enclose all open sides of the work platform when working above personnel or above areas normally used for walking. Whenever is possible scaffolds should be anchored at the top to other supporting equipment to prevent tipping.

Electrical equipment

Only authorized personnel shall connect, disconnect, repair or adjust any electrical equipment. Vapor-proof and explosion-proof valves shall not be removed for the purpose of attaching electrical equipment unless so authorized by the foreman in charge of the employee performing the work and the issuance of a Hot Work Permit.

Doors and dust covers of electrical apparatus to remain closed except during repair.

Bulbs for extension cords must be provided with protective guards to prevent breakage from a blow or from contact with liquids.

Only authorized personnel will enter switch gear rooms.

Do not use water hose to clean around turbines and electrical switchboards.

Compressed gas cylinders

Consider each cylinder as full and handle it accordingly. When standing upright, cylinders are to be securely fastened to prevent their falling over also when being transported from one location to another. When not in use protective caps shall be kept in place.

Always check the label and color code on all cylinders to make certain you have the proper type of cylinder for the work at hand. If you are in doubt what to do, check with your supervisor.

Take necessary precautions to prevent oxygen from contacting oil, grease or other combustibles. Oxygen and acetylene cylinders must be stored separately by 20 foot spacing.

If cylinders are left unattended for an extended time period, the hose and gauges must be removed and the cylinder valves closed. In no case should torches be left inside a vessel when not in use. Cylinder valves must be closed wherever the bottle(s) are left unattended.

Storing and, piling equipment

Safe proper methods must be used to stockpile materials so they will not fall or cause some other pile to fall. Pipes should be wedged and choked and boxes should be cross-tied.

Never palletize or store materials where it will obstruct aisle ways, stairs, ladders, exits, or safety and fire protection equipment.

Lighting heaters

Due to the danger of explosions of gases, all heaters must be thoroughly purged before lighting or re-lighting. Face shields must be worn for protection against flashbacks when heaters are lighted.

Personal hygiene

A high standard of personal cleanliness is necessary at all times. All clothing should be washed regularly.

Dirty laundry shall not accumulate to the extent that it becomes a house keeping or sanitary problem.

Living quarters are to be maintained in a neat and clean condition. Kits, clothing and personnel belongings are to be stowed away in the lockers.

Heavily soiled or dirty work clothes or shoes are not to be worn in the eating area. Leave them in the change areas.

Pollution

Place trash and refuse in the containers provided. On offshore platforms nothing metallic is to be thrown overboard. Any escaping oil or gas and accidental spillage into the sea should be reported. If an oil slick is observed, report this to your supervisor immediately.

Firefighting equipment

Prompt action is essential for effective fire fighting and knowledge of the location and use of fire equipment is necessary to permit taking immediate action. Familiarize yourself with the location of fire extinguishers, fixed water spray systems, hose reels, fire blankets and safety showers in the area in which you are working.

Fire protection equipment is not to be removed from its assigned station, other than for fire control purposes, without the approval of the platform supervisor or the safety Department at the Terminal.

To be assured that fire protection equipment is accessible at all times, the piling of materials in front of extinguisher locations or otherwise blocking access to the equipment is prohibited.

Approval is required from Supervisor of Safety Department before using fire monitors, hose reels, etc, for any purpose other than fire fighting. If authorized to use the fire water and the fire alarm alerts of an emergency, the individual using the fire water is to immediately cease and report to his emergency assignment.

If an extinguisher is used or the seal is broken for any reason, report it promptly to your Supervisor or safety Department so that it can be recharged/replaced and returned to its assigned place.

Location

Fire extinguishers are inspected periodically so that they will be operable when needed. Do not tamper with them, or cover them with clothing, material, etc.

In the event of a fire or other emergency, employees not involved in combating the fire or emergency shall stay away from the involved area unless advised otherwise.

The Terminal is equipped with a fire truck and crew which will be called to the scene of all major or potentially major fires.

Offshore production platforms

Emergency Procedures and Alarms

- Immediately upon reporting aboard the platform, each person will become familiar with:
- Posted escape routes
- Locations of firefighting equipment
- Alarm signals
- Station and duties assigned during emergencies - study the station bill carefully.

Alarm Signals

Prepare to abandon platform - continuous ringing of alarm bell. Fire or related emergency sounding of alarm for is seconds. All clear will be given by platform Supervisor.

Emergency Drills

Drills shall be conducted as if an emergency exists and held periodically as required. All personnel shall report to their assigned stations and be prepared to perform the duties assigned to them.

Emergency Actions

Man overboard

Immediately upon seeing a person fall overboard, throw the nearest lifebuoy as a marker and keep the person in sight. Activate man overboard alarm by shouting "Man overboard" repeatedly. Only a last resort abandons watch of the man overboard to acquire assistance.

Fire or other Emergency

Upon discovering a fire or other emergency, such as escaping gas or oil, immediately push a nearby manual fire alarm. In case of fire, attempt extinguishing with the nearest portable extinguisher.

Members of the fire Brigade will report to the scene of the emergency and fight the fire. All other personnel not associated with combating the emergency or necessary shut down operations will stay away from the area awaiting further instructions from the Platform Supervisor.

Abandon Platform

Upon hearing the "abandon platform" alarm, put on your life jacket and proceed immediately to your assigned station. The verbal order to abandon the platform will be at the sole direction of the Platform Supervisor or his designee.

Life Saving and Rescue Equipment

Located at strategic debarkation points on all platforms are life buoys and life jackets. These are to be used only in emergency situations or when practicing emergency drills.

Terminal operations

Emergency Procedures and Alarms

Immediately upon arrival at the terminal, each person will become familiar with:

- Hazardous locations
- Location of fire and emergency equipment
- Alarm signals
- Emergency stations and duties assigned during emergencies
- Emergency Number

Emergency Drills

Drills shall be conducted as if an actual emergency exists and held periodically as required. All personnel shall report to their assigned stations and prepared to perform the duties assigned to them.

Fire or other Emergency

Upon discovering a fire or other emergency, shout and raise alarm Report the situation immediately to the fire service in case of fire attempt extinguishing with the nearest portable extinguisher provided your safety is not in jeopardy. Members of the Fire Brigade and Fire Crew will report to the scene of the emergency and fight the fire. All other personnel not associated with combating the emergency or necessary shut down operations will keep clear of this area and await further instructions from the On-site Controller or his designee.

SAFETY RESPONSIBILITY

Our organization for safety shall be in the order enumerate hereunder:

MANAGING DIRECTOR

- Takes overall responsibility for all safety matters.
- Sets up safety communication machinery for reaching all employees.
- Approves all safety procedures and monitor compliance.
- Participates as chairman in the monthly company safety committee meetings.
- Personally investigates all serious accidents in conjunction with the General Manager.
- Provides budgetary approvals to procure all protective equipment.

GENERAL MANAGER

- Responsible to the Managing Director in all safety matters.
- Shall organize and develop all procedures necessary for workplace safety.
- He shall identify areas of safety training needs, and develop suitable training courses where possible.
- Attend the monthly safety committee meeting as deputy chairman.
- Organize down the line safety effort to ensure uniformity of purposes.
- Monitor compliance with procedures for safe practices.
- Join in investigation of all serious accidents.
- Develop inspection charts and checklists for his supervisors.

SENIOR STAFF

- Shall report to the General Manager in all safety matters.
- Shall be responsible for site safety talks, lectures and other training.
- Shall investigate all occurrences at their site and make presentations to superiors as may be directed.
- Shall enforce all rules and regulations on site/office.
- Shall carry out inspections on site/office at regular intervals to ensure accountability/good housekeeping is maintained throughout.
- Formulating safe procedures of work for his subordinates.
- Maintaining record of inspection of Company equipment in accordance with statutory/client regulations.
- Enforcing safety meetings/talks with their subordinates.
- Investigating all accidents that may occur in their areas of authority.
- Giving induction training to new employees deployed to work with him.
- Organize periodic safety inspection of the plant and premises.

SUPERVISORS/SAFETY OFFICER:

- They are responsible for the safety of the work force under their control.
- They need to ensure that all safety regulations are complied with and enforced within the groups of employees they supervise.
- Ensuring that safety regulations, including that of the clients, are strictly maintained.
- Disciplining defaulters of safety rules and regulations.
- Ensuring that tool box meetings are held daily.
- Conducting accident investigation to reveal root causes.
- Ensuring that personal protective equipment is utilized fully,

A. HSES MANAGEMENT COMMITTEE

This shall be the highest HSES Committee assembly in the CLEANALL ENVIRONMENTAL SERVICES LTD. The committee shall consist of the Managing Director, General Manager, other Senior Staff, Safety Officer and Supervisors. The Managing Director shall be Chairman or his appointee if he is absent. The Committee shall deliberate on all HSES issues affecting the

company, especially those raised at the Group (Supervisors and general workforce) HSES meetings and actions taken. The meetings shall hold once a month and minutes kept.

B. GROUP HSES COMMITTEE

The Group HSES Committee shall consist of supervisors and the general workforce. It shall deliberate on all HSES matters as regards the project at work site. The workforce shall be encouraged to raise HSES suggestions for enhanced safety of project and Company operations in general. Issues for management action shall be routed to it. Meetings shall hold monthly and minutes kept.

COMPANY PROCEDURES

EMERGENCY PROCEDURE

1. Every Cleanall employee should know where the available firefighting equipment is located and how to operate it.
2. All necessary measures must be taken to prevent fire. For instance, by obeying the "No Smoking" warning notices, repairs of faulty electric wires, etc.
3. In case of fire outbreak:
 - Whoever sees it should raise an alarm and shout -"Fire, fire, fire" for others to hear.
 - Call the fire service.
 - Mobilization to fight the fire with available fire fighting covers positioned conveniently near Escape route.
 - Leave the fire areas quickly closing all doors as escape is made if
 - Proceed to the Master Point through the nearest emergency exit.
 - Do not re-enter a burning building for any reason.

EMERGENCY TELEPHONE CONTACTS:

Fire Station	-	(QIT)	-	399913271
Fire Service	-	(Eket)	-	3899
Fire Clinic	-	(QIT)	-	3212
Medical Clinic	-	(Eket)	-	3895
Oil Spill Crew	-	(QIT)	-	3453/3386
Fire Station	-	Airstrip	-	4222
Fire Station	-	BRT	-	4621
Emergency Number	-	BRT	-	4777
Medical Clinic	-	BRT	-	4580

EMERGENCY RESPONSE PROCEDURES:

In reporting injury of fire, call either on Telephone or radio giving details of the emergency and exact location. Remain available to direct ambulance or fire crew to the required location. Stated above are MPNU telephone numbers to be contacted during emergency.

In case of fire emergency, contact loss Prevention Department on Extn. 327113999 (QIT).

In case of accidents or injury, contact QIT Medical Centre on 3212 or Eket Clinic on 3895.

Radio communication is established on the job with first aider and supervisor staff.

INCIDENT RATE

Incident Rate uses like hood estimation models for selected incident and estimates frequencies. They are based on certain milestones (200,000 Man hours).

LTI (Loss Time Incident) is injury that would not permit the victim to report for work within 24 hours after the incident.

FR (Frequency Rate) Nos. of LTI x 200,000

Man-hours workers

IR (Incident Rate) Nos. of accidents per year x 200,000

Average number of workers at risk during the period

Severity: Nos. of days lost from work x 200,000

Man hours worked

NEAR MISS

Any situation in which an ongoing sequence of events is terminated for further development of potentially serious (safety related) consequences is called a near miss. The purpose of collecting and analyzing near miss related information is:

1. To gain a qualitative insight into how (small) failure or errors develop into accidents and sometimes fatality.
2. To arrive at a statistically reliable fact into the factors giving rise to
3. Unexpected incidents.
4. To maintain a high level of alertness to dangerous situations.
5. For persons experiencing a near miss to report same to the supervisor or any Safety Personnel for timely correction.

LOSS PREVENTION CHECKS

Loss prevention emphasizes the identification of hazards at different stages of the project believing same for incident prevention.

It embodies Chemical Screening, Radiation Studies, and Plant Safety Audit which are characterized by:

A concern for insight into technology associated with major hazards.

1. Emphasis on the management support for safety.
2. A reliable system rather than a trial - and error approach.
3. A concern to avoid loss of containment resulting in major fire incident, explosion of toxic release.
4. The principles of risk analysis and hazard identification.
5. The principles of independence in critical assessments and inspections.
6. A critique of traditional practices of existing codes, standards and regulations where these appears outdated or obsolete.

SAFE OPERATING PROCEDURE

Our responsibilities include:

1. Implementation of safe program approved by the Client's Loss Prevention Department.
2. Managing day to day safety activities
3. Investigating and reporting all incidents/accidents
4. Preparing, distributing and monitoring tool box meetings
5. Arrangement and supervision of good housekeeping.
6. Preparation of information and statistics concerning safety performance.
7. Preparation and conducting safety training.
8. Organizing safety meeting for the supervisors/foremen.

ACCIDENT REPORTING PROCEDURE

In considering accidents as an unpleasant event which has the potential of causing injury to personnel and damage to property, it is pertinent to study, recommend and maintain standards at preventing accidents from occurring.

Most modern methods of preventing accidents depend on careful investigation and proper corrective measures.

ACCIDENT INVESTIGATION PROCEDURE

1. Visit scene of accident immediately.
2. Interview as many people as possible related to the accident
3. Interview witnesses.
4. Study possible causes the accident.
5. Ask for other people's opinion on the cause(s) and remedy.
6. Write a report immediately
7. Correct the conditions as much as possible urgently.
8. Inform the management immediately and follow up for company corrections of the conditions resulting in accident.

ACCIDENT RESPONSE PROCEDURE

Where there is any accident the following steps should be followed strictly:

1. Shout to alert everybody around
2. Try and put off the cause of accident if safe and possible
3. Remove the victim immediately from source of danger
4. Apply first aid if the injury is minor
5. Keep in safe and convenient position and eliminate crowding to ensure good ventilation
6. Evacuate victim to retained clinic for medical attention.
7. Write a report

Correct cause of accident.

Loss Prevention Department will participate in every accident investigation.

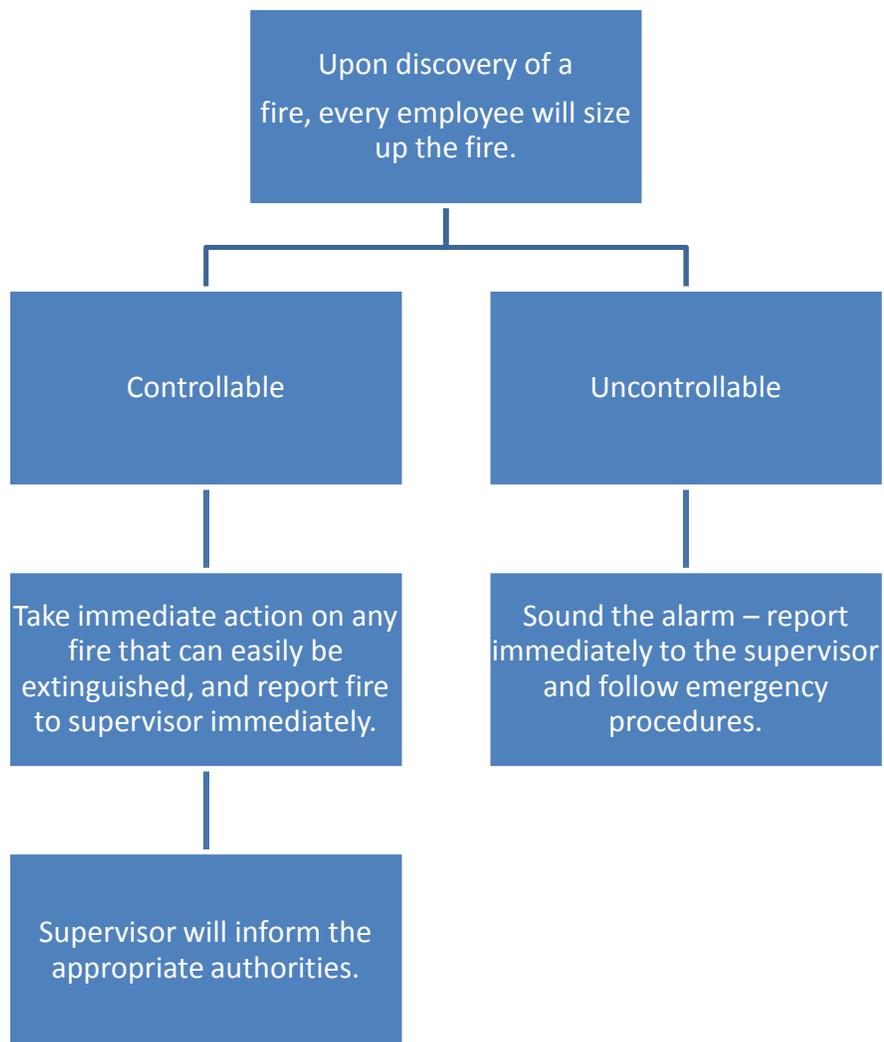
EMERGENCY OIL SPILL RESPONSE PROCEDURE

Once a signal for oil spill or garbage dump is received or sighted, the following procedures are taken:

- Inform relevant authorities at Company headquarters, Abuja and the Port office by wireless signal and phones.
- Make sure all staff appears in their protective gear.
- Proceed to muster point.
- Observe all routine checks on board and speed off to spill epicenter.
- Inform all relevant companies because once there is oil pollution, all stakeholders in the Port Industry are involved.
- At the spill site, the trajectory diagram is used to locate the direction, speed of flow and the shore line oil settling.
- Containment procedures are initiated like booming the oil so as most times to prevent it from reaching sensitive areas like fish farm, holiday resort etc.
- Recovery is also started.
- Clean up procedure is initiated after recovery.
- Wearing oil soaked apparel is prohibited during oil spill salvage.

FIRE EMERGENCY PROCEDURE

- Every Cleanall employee must know where to locate available firefighting equipment of the company.
- All necessary measures must be taken to prevent fire. For example, by obeying the “No Smoking” warning notices and making sure that faulty electrical gadget are repaired instantly.
- All battery connections are properly made to eliminate spark by naked cables.
- There should be alarm system in case there is fire.
- Any staff on seeing the fire outbreak should raise alarm sufficiently for others to hear.
- Mobilize to fight the fire with available fire fighting covers conveniently near the escape route.
- Call the fire service.
- Escape from the fire area quickly closing all doors.
- Proceed to the company muster point through the nearest emergency exit.
- Do not go back to the burning vessel for any reason.



FIRST AID PROCEDURE

All injuries received on the job should be reported to the clinic or doctor. If a person is injured and requires aid before the medical staff arrives, the following points should be considered.

1. Remove the victim from further harm. (Removal from water, from fire or room containing gas or smoke.)
2. If the victim is not breathing, ensure he has an open airway and give artificial respiration.
3. Control severe bleeding.
4. Except in cases stated in item, do not move the victim, do not let him up or walk about.
5. Avoid unnecessary manipulation and disturbance.
6. Keep the victim warm.
7. Find out what happened from the victim or witnesses.
8. Examine the victim for injuries.
9. Make the victim as comfortable as possible.
10. Check the victim's pulse.
11. Apply dressing's splints or bandages as required.
12. Arrange for transportation.
13. Remain in charge until the victim reaches medical attention.
14. Above all, do nothing to the victim to increase his injury.