

Safe TO Work in Trinidad & Tobago (STOW-TT)



Administration Manual

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SECTION 1

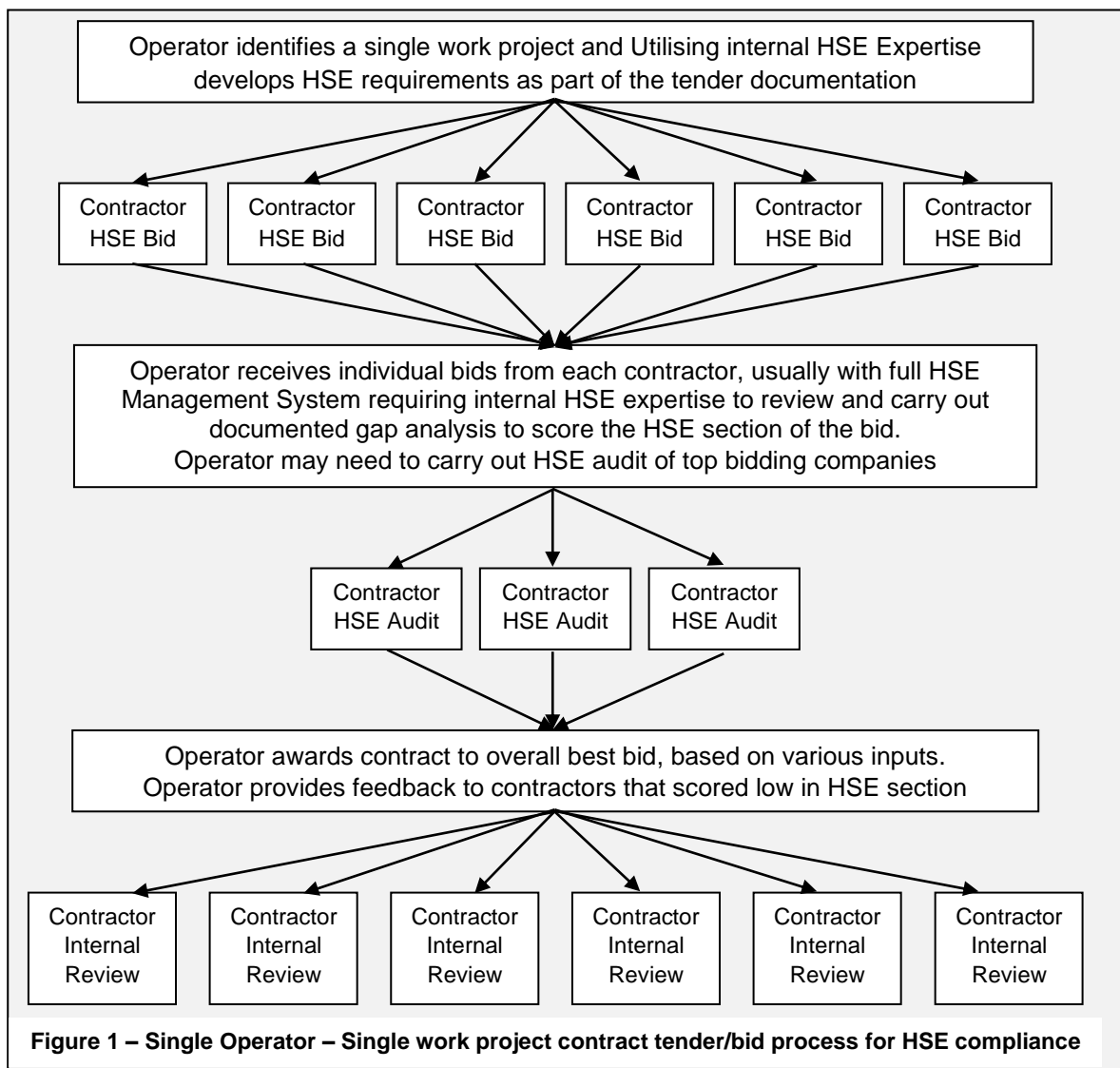
Introduction

- 1.1 The energy industry of Trinidad and Tobago is primarily operated by very large national, multi-national or governmental organisations that utilise the services of contracting companies to meet the varied specialist areas needed to operate and maintain the facilities they own or control.
- 1.2 For many businesses owned locally, the energy industry is an extremely important industry to be involved in and the ability to provide services to the operating companies can be a determining factor in the success of the overall business.
- 1.3 The way in which the operating companies decide on the contracting companies that they wish to work with is generally standardised as a recognisable business process that involves the operating company compiling tender documents that identify the work scope and the minimum requirements to be met by the contractor that is successful in being awarded the contract.
- 1.4 The tender documents contain various sections that always detail the work scope but also include standard sections such as those that relate to the technical, financial, personnel and HSE requirements the operating company wishes to see in the company they award the contract to.
- 1.5 Businesses in Trinidad and Tobago have demonstrated their ability to respond to client needs and have placed great emphasis on meeting international standards applicable to their offered services. This includes quality control, operations excellence, personnel training, recognised financial modelling etc.
- 1.6 As the businesses in Trinidad responded to the identified needs of the operating companies, there has been a growing market for locally owned or operated companies within the energy sector where they have gained access to a growing complexity of projects with inherently more operational

risk potentials and this has led operating companies to become acutely aware of the HSE performance requirements needed to be met by the contractors they work with.

1.7 Prior to the acceptance of the "STOW-TT Minimum HSE Requirements" by the Energy Industry of Trinidad and Tobago, the variety of individual requirements set out by individual operating companies made it difficult, costly and time consuming for contracting companies to be able to work with more than one or two operating companies at a time, simply because meeting one operating company's HSE compliance requirements, did not necessarily allow the contractor to meet the requirements of other operating companies.

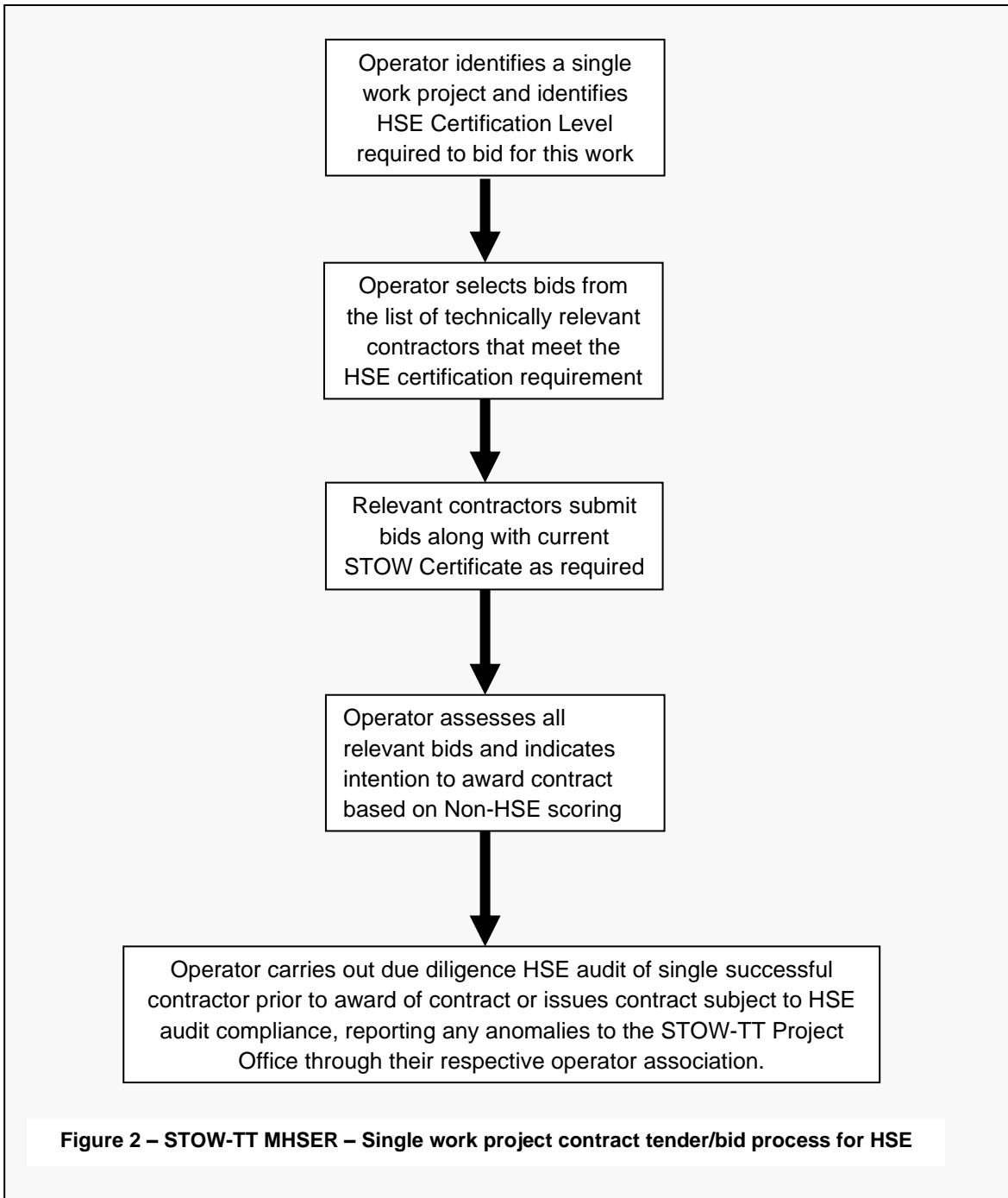
1.8 Prior to the acceptance of the STOW-TT Minimum HSE Requirements by the operating companies, the process that was used to evaluate the HSE compliance of bidding contractors was time consuming for the skilled



professional resources of both the operating company and the contractor companies.

- 1.9 Figure 1 sets out diagrammatically the broad process that was undertaken by individual operating companies in their review of the HSE compliance sections relating to the evaluation of bidding contractors wishing to work with their organization.
- 1.10 In considering Figure 1, it is important to remember that this process was being carried out by all the operating companies, in both upstream and downstream sectors of the energy industry, for each piece of work they put out to tender.
- 1.11 There are over twenty operating companies in the Energy Industry in Trinidad and Tobago and they all draw from the same local pool of contracting companies. It is therefore obvious that while the workload on operating companies using this process was high, this burden was multiplied many times for the contracting companies.
- 1.12 The Energy Chamber of Trinidad & Tobago (ECTT) in listening to their members which comprise both the operating companies and the majority of contracting or service companies that work in the energy sector, secured independent funding through the Inter-American Development Bank (IADB) to set up and work a more efficient method of carrying out the bidding process as it related to meeting the HSE requirements of the Energy Industry.
- 1.13 In setting up this process, the ECTT has developed the STOW-TT Minimum HSE Requirements that are agreed upon by both the upstream (AUOTT – Association of Upstream Operators of Trinidad & Tobago) and downstream (PLEA – Point Lisas Energy Association) associations representing operators.
- 1.14 The STOW-TT Minimum HSE Requirements Contractor Guidance Manual is a separate document that is widely available to provide detailed guidance on how the business community wishing to work with operating companies may demonstrate compliance with the STOW-TT Minimum HSE Requirements.
- 1.15 This Administration Manual, is designed to describe the various components and processes that are needed in order to run the certification system and

Figure 2 shows diagrammatically how the bid/tender process is intended to work.



1.16 This manual is set out in such a way that each of the main process components or groups are explained as to their structure and purpose.

SECTION 2

Main Components

- 2.1 There are six Main process components or groups that provide the organisational structure for the certifying process to be successful. They are:
- a. **The STOW-TT Minimum HSE Requirements:** These are the HSE Requirements that the participating operating companies have agreed are necessary to be addressed when service providers are to be considered eligible to bid on work in the energy industry.
 - b. **The Certification Tier System:** This is the system component that describes the level of risk that contracting companies are permitted to operate within.
 - c. **The STOW Implementation Board:** This board is the overall executive governance body that ensures the process is set up efficiently and is working as intended.
 - d. **The STOW-TT Project Office:** This is a working body that carries out the day to day operations on behalf of the STOW Implementation Board
 - e. **The STOW Technical Committee:** These are individual, professionally qualified HSE specialists who are contracted by the Energy Chamber or who are volunteers of the STOW Charter signatory operating companies. They ensure that the standards for quality control particularly on STOW Audit Reports as established by the STOW Implementation Board and the STOW Project Office are maintained. They provide technical support to the Board and make recommendations on areas for improvement of the STOW-TT certification process.
 - f. **The STOW Assessors:** These are individual, professionally qualified HSE specialists that are authorised to evaluate contracting companies' HSE MS based on the established minimum HSE Requirements and provide recommendations to the STOW Implementation Board on the certification of these companies.

SECTION 3

The STOW-TT HSE Minimum Requirements

- 3.1 The STOW-TT Minimum HSE Requirements are developed and approved under the authority of the STOW Implementation Board.
- 3.2 The purpose of the STOW-TT Minimum HSE Requirements is to provide transparent understanding of the HSE management system requirements that operating companies consider essential to be addressed.
- 3.3 The structure of the STOW-TT Minimum HSE Requirements is based on an expectation rather than prescription model.
- 3.4 The reason for an expectation model to be used is to allow for the diverse work scope and practices from an international industry to be catered for.
- 3.5 There are eleven elements headlined in the STOW-TT Minimum HSE Requirements and under each of these elements, there are a varied number of expectations on how the operating companies wish to see HSE management approached.
- 3.6 In an attempt to assist and guide service providers that have limited or previously unstructured or undocumented approaches to the management of HSE within their organisations, the STOW Implementation Board has authorised a STOW Contractor Guidance Manual - HSE Minimum Pre-Qualification Requirements, which may be referenced by service providers to either carry out self-assessment, self-development or provide guidance in the development of their HSE Management System in conformance with the minimum STOW-TT requirements. The STOW Contractor Guidance Manual - HSE Minimum Pre-Qualification Requirements is a separate publication that provides all the required elements, all the required expectations and examples of how an organisation may meet the expectations.
- 3.7 Where a service provider has undertaken development of their safety management system with reference to internationally accredited safety

management system models, it is likely that they will meet the STOW-TT Minimum HSE Requirements.

- 3.8 Examples of internationally accredited safety management systems that use non-prescriptive goal setting models include but are not limited to:
- a. UK – HS(G)65 Successful Health and Safety Management.
 - b. UK – OHSAS 18001 / ISO 45001 (BSI)
 - c. UK – BS 8800 (BSI)
 - d. International - DNV – OHSMS
 - e. Australia/New Zealand AS/NZ 4801
 - f. Spain – UNE 81900
 - g. USA API 9100
- 3.9 The STOW Implementation Board does not specifically endorse any one internationally recognised safety management system standard. They consider that all the international accredited standards have technical integrity and it is for the organisations that use these models to ensure the applicability to their operations.
- 3.10 The level of compliance with the individual expectations will be used to assess the level and duration of certification that a service provider will achieve.
- 3.11 To be awarded certification, companies will be required to meet the following minimum requirements:

Compliance Level	Validity of STOW Certificate
Minimum of 75% in each element & Minimum of 70% in the physical conditions tour OR	1 year
Minimum of 85% in each element with sound evidence of implementation & Minimum of 80% in the physical conditions tour	2 years

N.B. FOR 2 YEAR CERTIFICATION, THE ORGANISATION MUST HAVE EVIDENCE OF COMPLETION OF AT LEAST 1 COMPLETE CYCLE OF INTERNAL AUDITS OF THE HSE MS.

2 YEAR CERTIFICATION WILL NOT BE GRANTED ONLY ON THE BASIS OF DOCUMENTATION

SECTION 4

The Certification Tier System

4.1 Introduction

- 4.1.1 This certification system adopted by the Energy Industry of Trinidad and Tobago is structured so as to recognise that the variety of support operations that the energy Industry requires to be provided for, do not all bring the same levels of risk to the overall operations.
- 4.1.2 The Certification System that is used in support of the STOW-TT Minimum HSE Requirements is approved and endorsed by the majority of Operating Companies that have operations in Trinidad and Tobago.
- 4.1.3 The Association of Upstream Operators of Trinidad and Tobago (AUOTT) represents the majority of operating companies that operate in the upstream sector of the energy industry in Trinidad and Tobago and they have approved this certification system.
- 4.1.4 The Point Lisas Energy Association (PLEA) represents the majority of operating companies that operate in the downstream sector of the energy industry in Trinidad and Tobago and they have approved this certification system.
- 4.1.5 The certification system does not cover the detail of the myriad of types of work carried out in support of the energy industry and operating companies in issuing bid documentation, will indicate the STOW-TT Minimum HSE Requirements Certification risk level that is required for service providers to be eligible to bid on the service provision.
- 4.1.6 The STOW Database is used to assist with the management of STOW Audits, including applying for the STOW audit and contractors uploading HSE documents for review by Assessors. It is also the portal through which Assessors accept and manage assigned audits.

Certified service providers will be entered onto the STOW database that is available to all the member operating companies and their commitment to the service providers is that they will ensure that **they will be invited to bid for work in alignment with the services for which they are certified.**

4.1.7 In explaining the term "appropriate service providers" the operators will include those service providers that have the apparent or potential technical ability, equipment, personnel, financial and other required capabilities to carry out the work in the bid process.

4.1.8 Stakeholders who have questions or identify opportunities for improvement of this certification system are encouraged to submit these to the STOW-TT Project Office charged by the STOW Implementation Board to communicate, monitor and continually improve the certification system.

4.2 Overview

4.2.1 The Certification System is constructed in three horizontal layers with one vertical split (See Figure 3, pg. 15).

4.2.2 The vertical split is simply provided to allow for differentiation in the specific requirements of the Offshore Energy Sector.

4.2.3 The horizontal layers are built using an increasing level of compliance requirement and more robust HSE Management systems to give service providers access to work in increasingly higher risk areas of the energy industry operations.

4.2.4 Any service provider, of any size can apply to be certified at any level in either or both the offshore or onshore sectors of the energy industry.

4.2.5 Where a service provider is certified to a high risk onshore, the only requirement to be certified at the same level for offshore operations is that they meet the specific offshore minimum requirements for certification.

4.2.6 Certified service providers are required to maintain compliance with their certification level and they are required to undergo periodic re-certification to demonstrate this.

4.2.7 Within the certification system, where the risk to operations is considered very low, there is an option for operating companies to decide that no certification is required for the service provision being requested.

4.3 The Difference between Offshore Certification and Onshore Certification

4.3.1 There are two defined areas of certification that differentiate the certified onshore service provider from the certified offshore service providers.

4.3.2 Given the remote nature of offshore locations and the extended tours of duty that service provider personnel are required to spend on location, the offshore sector of the industry requires all employees to undergo a fit to work medical examination that meets the Oil and Gas UK (OGUK) Medical Examination requirements.

4.3.3 The STOW Implementation Board does not solely accept the OGUK Medical Examination Requirements and it is not required for service providers to demonstrate certified OGUK Medical exams for their personnel. However, where this is provided, the medical fitness for work will be accepted by the STOW Implementation Board.

4.3.4 The method of travel, and the inability to simply walk away from an emergency situation in offshore locations means that the offshore energy sector requires all personnel to undergo specific basic training in offshore safety and emergency procedures that are specific to the industry. This minimum requirement is accepted as being training that is approved for tropical climates by the Offshore Petroleum Industry Training Organisation (OPITO).

4.3.5 The third area of specific offshore minimum requirements is not applicable to all service providers (See Figure 3, pg.15). However, they deal with the nature and method of dealing with emergencies offshore, which often involves the use of equipment or resources that are not necessarily seen in the onshore sector, or are needed to be used by the general workforce onshore.

4.3.6 Certain service providers that work in the energy sector will be expected to provide personnel that are competent at using some of the emergency response resources that are not common to the onshore sector. Examples of these are:

- a. Breathing Apparatus.
 - b. Helicopter firefighting equipment.
- 4.3.7 Linked with the competence of emergency response, some service providers may be required to provide personnel that have specialist skills in emergency response that are not required onshore. Examples of this include:
- a. Personnel that have been trained to effectively manage and control Emergency Response in the Offshore Environments.
 - b. Fire fighting skills for sustained fire fighting roles.
 - c. Dynamic lifting skills.
 - d. Specialist Medical Skills at a more advanced level than those reasonably needed on all sites onshore.
- 4.3.8 Where a scope of work requires specialist or unusual skills relating to the HSE Management or emergency response on site, this will be clearly explained within bid documentation and it is foreseeable that failure to meet those requirements can result in an otherwise certified service provider being unsuccessful in being awarded the work they bid for.

4.4 Assessing Work Risk Levels

- 4.4.1 The energy industry is an industry that can provide numerous examples of how major risk, resulting in multiple fatalities, major loss of facilities and major damage to the environment can be realised.
- 4.4.2 Globally, the loss of life in pursuit of industrial activity is often measured in the hundreds per annum. Fatalities have occurred in every aspect of every operation regardless of apparent safety standards. Examples include:
- a. Individual fatalities from being hit by moving or falling objects, falling from heights, contact with electrical power sources, entanglement with mechanical equipment, inhalation of toxic vapour etc.
 - b. Multiple fatalities through loss of stability, explosions, fire, catastrophic mechanical failure, road traffic collisions, aircraft malfunctions etc.

- 4.4.3 Within Trinidad and Tobago, the industry appears relatively safer than some other areas of the world, however fatalities still occur. Examples include:
- a. Individual fatalities through falls from heights, contact with electrical power sources, being struck by moving objects etc.
 - b. Multiple fatalities are less frequent although they still have occurred, most memorably from inhalation of toxic vapours, explosions and road traffic accidents.
- 4.4.4 Within this context it is not alarmist to recognise that the potential for significant risk realisation is always present and the industry both globally and locally is renowned for continuously looking to reduce the frequency with which these risks may be realised.
- 4.4.5 In developing guidance notes on how potential service providers within the energy industry should be considered risk worthy, the operators have attempted to define work scope risk levels based on the potential for risk if the service provider did not mitigate against realisation of the risk through proven systematic HSE management approaches.
- 4.4.6 Where the operator considers the work scope to have limited potential for significant harm to result from the work approach, they may accept the work may be undertaken by service providers that may be unable to demonstrate the highest levels of integrity in their HSE Management System development.
- 4.4.7 Even though this may be voluntarily accepted by the operator, this acceptance is based on an understanding that the service provider will demonstrate meeting the minimum legal requirements of the country that they operate in and that they will have in place a continuous improvement programme that will bring increasing integrity to their HSE management approaches.

4.5 No Certification Required

- 4.5.1 An Operator may consider relevant low risk service provisions to bring such insignificant risk to their operations that the time and expense that potential service providers would have to undertake to become certified and

maintain certification outweigh the need for certification under the STOW-TT Minimum HSE Requirements system.

- 4.5.2 Where the operator recognises that this level of risk is applicable, they should have their own internal process for HSE to ensure that contractors can work safely.
- 4.5.3 Limited examples of the type of service provision that may not require certification are provided in Appendix 1 of this manual.

4.6 Low Risk Certification

- 4.6.1 Low risk operations are defined as those that the operator considers to present limited risk of injury, damage to equipment or damage to the environment.
- 4.6.2 In identifying the type of work that the operator will put into this class of certification, they will consider the following:
 - a. The type of injury or damage that could be caused by the work. This is likely to realistically remain within an occasional possibility of injury that may require first aid treatment, where equipment damage is likely to be easily identifiable and remain below an acceptable financial level and where environmental impact is likely to be low and of temporary duration.
 - b. The type and nature of work to be carried out. This is likely to be routine work that is simple in nature and requires a limited variety of skill sets or equipment to complete.
 - c. The number of people that may be exposed to the risks associated with the work. This is likely to include the number of people carrying out the work and any personnel that may be affected by the work while it is carried out or who could be affected once the work has been carried out.
 - d. The time frame under which the risks from the work activity will be present. This is likely to consider the overall risk of an incident and balance that against the continued or aggregated time frame during which people will be at risk.

4.6.3 Limited examples of the type of work that may be included in the Low Risk Certification category are provided in Appendix 1 of this manual.

4.7 High Risk Certification

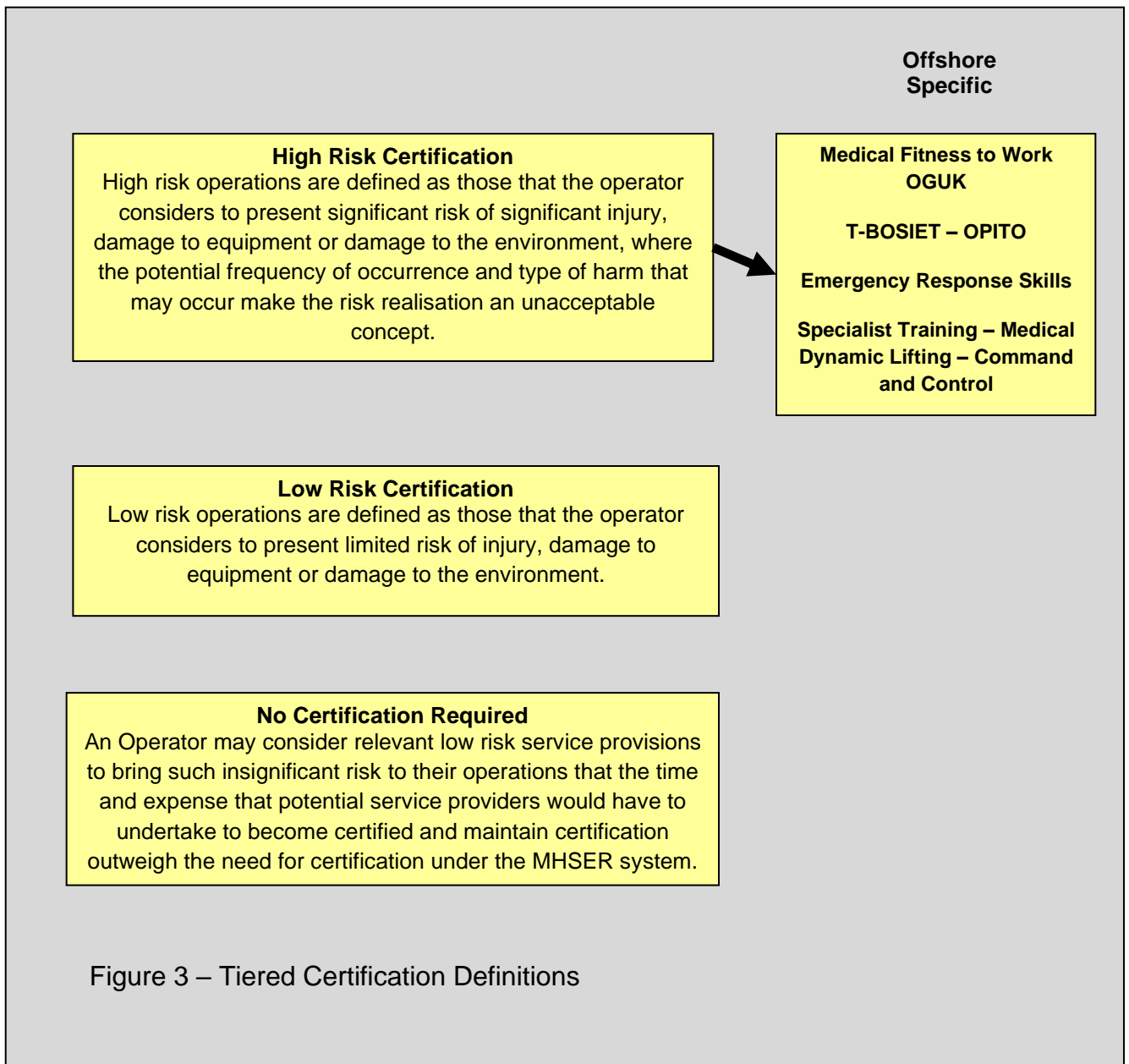
4.7.1 High risk operations are defined as those that the operator considers to present significant risk of significant injury, damage to equipment or damage to the environment, where the potential frequency of occurrence and type of harm that may occur make the risk realisation an unacceptable concept.

4.7.2 The type of work is likely to include that which the operator knows has caused serious multiple injuries or extensive damage in the past and where they recognise the requirement to understand the integrity of the HSE management approaches used by any service provider to meet industry best practice.

4.7.3 The type of work that the operator will put into this class of certification will be all work not adequately fitting the risk descriptions at the lower levels.

4.7.4 Limited examples of the type of work that may be included in the High Risk Certification category are provided in Appendix 1 of this manual.

4.8 **Figure 3** shows a diagrammatical view of the Tiered Certification Definitions.



SECTION 5

The STOW Implementation Board

Terms of Reference:

5.1 Introduction

- 5.1.1 The STOW Implementation Board (STOW IB) has been established to allow the energy Operating Companies in both the upstream and downstream to: a) agree upon the minimum HSE requirements they will use when procuring goods and services, and; b) communicate these to contractors, service companies and suppliers.
- 5.1.2 The role of the STOW IB is to govern the process by which the minimum requirements are set, communicated, implemented, assessed, monitored and reviewed.

5.2 Vision Statement

- 5.2.1 To raise regional contractors' performance and global competitiveness by assuring effective management of HSE risk.

5.3 Mission Statement

- 5.3.1 The Mission of the STOW IB is to assure that contractors in the energy industry have acceptable health, safety and environmental standards by assessing and certifying their HSE Management Systems.
- 5.3.2 In support of this mission, the STOW IB is required to set up and maintain:
- a. An efficient method for review and update of the agreed minimum HSE Requirements.
 - b. An effective process for certifying companies, sole traders and others who meet the minimum HSE Requirements.

- c. An effective process for accrediting Independent Assessors (individual HSE Professionals) to conduct certification assessments on behalf of the STOW IB.
- d. A monitoring, evaluation and reporting process that identifies gaps between the actual performance of certified companies or organisations and the expected HSE performance, in accordance with the minimum requirements.
- e. A monitoring, evaluation and reporting process that identifies gaps between actual performance of Independent Assessors and meeting the expected performance, in accordance with the accreditation requirements.
- f. Liaise with Ministry of Energy and Energy Industries (MOEEI), Occupational Safety & Health Agency (OHSA), Trinidad & Tobago Bureau of Standards (TTBS), Accreditation Council, National Training Agency (NTA), Environmental Management Agency (EMA) and other statutory agencies as appropriate.

5.4 Governance

- 5.4.1 The STOW IB will be accountable to the Association of Upstream Operators of Trinidad & Tobago (AUOTT) and the Point Lisas Energy Association (PLEA).

5.5 Roles and Responsibilities of the STOW IB

- 5.5.1 The STOW IB is:

- 1. The signing authority to any and all new, revised or revoked STOW HSE Requirements that are incorporated into the STOW HSE Guidelines.
- 2. The Governing Body for the STOW-TT Project Office which is the implementing agency for the STOW initiative.
- 3. Responsible for providing the Energy Industry Operating Companies with assurance that the STOW HSE Requirements meet all of the legislative and corporate expectations of the operating companies.

4. Responsible for ensuring that the STOW HSE Requirements are effectively approved and communicated to all service companies, contractors and suppliers.
5. Responsible for promoting and facilitating the improvement of HSE performance in local businesses in the energy sector.
6. Responsible for providing openness, clarity and integrity in the process for selecting and appointing Assessors to be permitted to evaluate the compliance to the minimum STOW-TT HSSE requirements of contracting companies or others that wish to provide services to Operating Companies in the Energy Sector of Trinidad and Tobago.
7. Responsible for providing public assurance that the process for certifying companies against the STOW HSE Requirements is carried out in an unbiased manner that demonstrates integrity of the process.
8. Responsible for reviewing the performance reports of Independent Assessors.
9. Responsible for facilitating the feedback process where concerns, improvements and lessons are addressed, relating to the functioning of the STOW-TT Project Office and/or Independent Assessors.
10. Responsible for hearing and determining appeals from organisations or individuals concerning any aspect of the certification or accreditation process. Where the Board is required to meet with companies and / or Assessors with respect to complaints and appeals, a sub-committee of the Board comprising a minimum of two representatives from either the AUOTT or PLEA would be required to conduct enquiries and lead investigations.
11. Responsible for ensuring that the work and progress of the STOW initiative are communicated to the energy industry, the wider private-sector, governmental and non-governmental agencies.

5.6 Competence of persons assigned to the STOW Implementation Board

- 5.6.1 Persons to be nominated for membership to the STOW Implementation Board should satisfy the following criteria:

1. Should hold Senior HSE positions in their organizations;
2. Should be able to provide oversight, direction and leadership;
3. Should have the desired personal qualities and characteristics, accomplishments and stellar reputation in the HSE field;
4. Should possess current knowledge and contacts in HSE in the oil and gas & petrochemical sectors relevant to the business of STOW;
5. Should have the ability and willingness to commit adequate time to the Board and STOW-related matters;
6. Should have the skills and personality that would mix well with those of other members of the Board and potential members in building a Board that is effective, collegial and responsive to the needs of STOW;
7. Should be able to bring diversity of opinion and experience;
8. Should be an accomplished person of integrity, objectivity and intelligence, with reputation for sound judgment and open mind, and a demonstrated capacity for thoughtful group decision-making;
9. Should have understanding of the importance of good governance practices and an ability to contribute to the Board in this regard;
10. Should have the ability to see multiple points of view on any issue and be able to project potential scenarios into the future to facilitate the strategic planning process;
11. Should be able to make decisions based on analysis of the available information and a mixture of wisdom, experience and judgment.

5.7 Composition of the STOW Implementation Board

- 5.7.1 The STOW Implementation Board is to be composed of not less than eleven members including the Chairperson and not more than fifteen members where the overall composition will always be an odd number of members.

- 5.7.2 The two Operating Company organisations, PLEA and AUOTT, are required to appoint an equal number of Members to the STOW Implementation Board.
- 5.7.3 The STOW Implementation Board is also to have at least one independent member that is not directly aligned with the Operating Companies. This member or members allows the STOW Implementation Board to build links and raise the profile of STOW outside the Energy Industry.
- 5.7.4 The independent member may come from industrial areas considered relevant by the Board.
- 5.7.5 The number and source of the independent members for the STOW Implementation Board will be decided by the two Operating Company associations.
- 5.7.6 The Energy Chamber nominates a suitably qualified Chairperson from AUOTT or PLEA. The nominee is presented to the STOW Implementation Board and once there are no objections, the Chairperson is ratified at a statutory meeting of the STOW Implementation Board.
- 5.7.7 The method of appointment of persons to the STOW Implementation Board is considered a matter for the Operating Company Organisations. They must however be cognisant of the quality and qualifications of the people they appoint to serve on the STOW Implementation Board.

5.8 Meetings

- 5.8.1 The STOW Implementation Board has a statutory meeting the fourth Thursday of every month from 1:00 p.m. 2:30 p.m. Additionally, decisions on audit reports are taken via round robin on a weekly basis.
- 5.8.2 Members of the STOW Implementation Board are expected to attend a minimum of ten (10) statutory Board Meetings per calendar year.
- 5.8.3 To maintain a quorum for Statutory meetings, there must be a minimum of three representatives from AUOTT and PLEA.
- 5.8.6 For decisions via round robin, a minimum of one representative each from AUOTT and PLEA forms a quorum.
- 5.8.7 Minutes of the past meeting is to be prepared and disseminated to the members of the STOW Implementation Board and the agenda for the upcoming meeting must be circulated to the Board prior to the meeting.

5.9 Decision on Audit Reports

- 5.9.1 The Board has the final decision with respect to the certification of companies. Certification is granted to a company for a determined scope of activities. Once the report is submitted via the STOW Database, companies can generally expect to get feedback on the Board's decision on their STOW Certification within **2 months** of submission of the report. If the Board has queries on a company's report, the Assessor may have to re-visit the report and dependent upon the nature of the queries, this can result in a delay in the time taken to certify a company.
- 5.9.2 In the instance where the Board and the Independent Assessor have divergent views with respect to any aspect of a company's audit report, the Board reserves the right to have the Assessor review the particular areas of the report where there may be concerns. If an agreement cannot be arrived at between the Board and the Independent Assessor, the Board has the right to make the necessary changes in an addendum to the report, identifying the areas of concern and the Board's final decision.

5.10 Code of Conduct for the STOW Implementation Board

5.10.1 The Code of Conduct is to be signed and observed by all Board Members under the STOW Initiative.

5.10.2 Introduction to the Code of Conduct

As a member of the STOW Implementation Board, it is your responsibility to make sure that you are familiar with and that your actions comply with the provisions of this Code of Conduct. The principles and requirements that comprise the code are based on and are designed to ensure full compliance by the STOW Implementation Board with regard to fiduciary duties imposed on such individuals. The code is not designed to replace courts of law. Members of the STOW Implementation Board affirm their endorsement of the code and acknowledge their commitment to uphold its principles and obligations by accepting and retaining membership on the Board. Each member must comply not only with the terms, but also the intent of this Code. Members of the STOW Implementation Board (including ex-officio members of the Board) shall at all times abide by and conform to the following Code of Conduct in their capacity as STOW Implementation Board members:

5.10.3 Guidance on the Code of Conduct

You must observe the rules of conduct contained in this Code. It is your personal responsibility to comply with these and review regularly and at least annually, your personal circumstances with this in mind, particularly when your circumstances change. You must not at any time advocate or encourage any action contrary to the Code of Conduct.

5.10.4 Standards

1. A Board member shall act with integrity and in an ethical and professional manner in their interactions with each other, the Chairman, Independent Assessors and the public.
2. Board members recognize that all Board decisions and actions are to be based on integrity, competence and independent judgment and shall use proper care and exercise independent professional judgment in the performance of their duties.
3. Board members shall act in accordance with the highest standards of honesty, integrity, fairness and ethical conduct while serving on the Board as

well as representing the Board, without allowing their independent judgment to be subordinated

4. Board members shall maintain high ethical and moral character, both professionally and personally, so that their behavior will reflect positively upon the STOW Implementation Board and the STOW Project Office.
5. Board members shall act with competence and shall strive to maintain and enhance their competence and that of their fellow Board members.
6. Board members shall maintain confidentiality about all matters that are considered in closed meetings including STOW Board meetings and shall only report on those matters to relevant Associations approved by the STOW Board.
7. Except as the Board may otherwise require or as otherwise required by law, no Board member shall share, copy, reproduce, transmit, divulge or otherwise disclose any confidential information related to the affairs of the STOW Implementation Board and the STOW Project Office and each member of the Board shall uphold the strict confidentiality of all meetings and other deliberations and communications of the Board
8. Board members shall exercise due diligence to avoid breaches of duty via negligence, intentional action or omission and unauthorized communications with individuals trying to influence by improper means or seeking to receive personal gains through Board decisions.
9. Board members shall not abuse their authority by using their offices to obtain favourable treatment by Contractors or any other stakeholder of the STOW programme.
10. Board members shall not engage in conduct that would compromise, discredit or diminish the integrity of the STOW Implementation Board or the STOW programme.
11. Board members shall refrain from using Board meetings or the STOW approval processes to advance their personal agenda.
12. Board members shall not communicate with contractors with respect to matters concerning STOW certification with companies under consideration for certification approval by the Board while the assessment is pending.
13. Board members shall avoid any relationship with a contractor that could influence any decision to be made by the Board.

14. Board members shall be respectful of each other and shall not utilize Board meetings to upstage or embarrass colleagues.
15. Board members shall respectfully consider the opinions of others during deliberations, strive for integration of viewpoints and / or consensus building in decision-making and shall respect the judgment of the Board in regard to its decisions.
16. Board members must not accept any offer of gifts or hospitality from any individual or organization which stands to gain or benefit from a decision the STOW Implementation Board may be involved in determining.
17. Board members shall not seek or accept or offer directly or indirectly any gifts, donations, remuneration, hospitality, illegal payments, favours in whatsoever form howsoever described by contractors, consultants, etc., that is perceived as intended, directly or indirectly, to influence any decision.
18. Board members shall avoid conflicts of interest or the appearance of such and will immediately declare to the STOW Implementation Board circumstances or interests that may influence their judgment or objectivity.
19. Board members shall recuse themselves and shall not participate in the consideration of any matter or attempt to affect the outcome of any issue before the Board when to do so might result in even the appearance of a conflict of interest. When encountering potential conflicts of interest, Board members shall identify the conflict and as required, remove themselves from all discussion and voting on the matter. Specifically, Board members shall follow these guidelines:
 - a) Avoid placing (and avoid the appearance of placing) one's self-interest or any third-party interest above that of the Board; while the receipt of incidental, personal or third- party benefit may necessarily flow from certain STOW Implementation Board activities, such benefit must be merely incidental to the primary benefit to the Board and its purposes;
 - b) Do not abuse Board membership or authority by improperly using Board membership or the SPO staff, services, equipment, resources or property for personal or third-party gain or pleasure. Board members shall not represent to third parties that their authority as a Board member extends any further than that which it actually extends.

I declare that I have read, understood and will uphold this Code of Conduct.

NAME (BLOCK LETTERS)

SIGNATURE

DATE

SECTION 6

The STOW-TT Project Office

6.1 Introduction

- 6.1.1 The STOW-TT Project Office, under the guidance of the STOW Implementation Board, has been established as the single point of authority for supervising the work of STOW Assessors on behalf of the STOW Implementation Board.
- 6.1.2 The way in which the STOW-TT Project Office is expected to operate does not require all members of staff to have specific technical expertise in the area of HSE Management Systems or processes.
- 6.1.3 The strength and validity of the STOW-TT Project Office needs to be based on the integrity, and to some extent independence, with which they are able to undertake their role in support of the STOW Implementation Board.
- 6.1.4 The initial location and administrative centre for the STOW-TT Project Office will be under the working leadership of the ECTT with oversight being provided by the STOW Implementation Board.

6.2 Requirements of the STOW Project Office

- 6.2.1 The STOW-TT Project Office is required to set up and maintain processes that:
 - a. Assist in the initial screening of candidates who wish to be authorized as Independent Assessors based on clearly defined and described set of criteria that need to be met in order for an individual to be deemed competent to assess STOW-TT Minimum HSE Requirements Compliance.
 - b. Enable timely review of all applications from individuals to be authorized as Independent Assessor.

- c. Maintain an up to date register of all individuals that are authorized as Independent Assessors.
- d. Monitor the performance of authorized Independent Assessors.
- e. Provide a clearly defined and communicated disciplinary process for sanctioning Independent Assessors that do not uphold the clarity and integrity of the certification process.
- f. Enable effective reporting to the STOW Implementation Board and any other related agencies.
- g. Manage prudently the finances of the STOW-TT Project Office.
- h. Develop processes to manage appeals and complaints from contractors.
- i. Develop operational policies and procedures for the STOW programme to ensure the continued improvement of the STOW.
- j. Conduct research on the impact of STOW on the HSE performance of the oil and gas sector.

6.3 Role of the STOW-TT Project Office

- 6.3.1 The role of the STOW-TT Project Office is to act as the administrative centre for Independent Assessors to be authorized to carry out certification process work on behalf of the STOW Implementation Board.
- 6.3.2 In order to play this role effectively, there are several other roles that fall into the remit of the STOW-TT Project Office. They are to act as:
 - a. The communication centre between the STOW Implementation Board and the Independent Assessors with reference to any and all new, modified or repealed STOW-TT Minimum HSE Requirements that are to be amended in the Audit Protocol and the Contractor Guidance Manual.
 - b. The monitoring centre for Independent Assessors to be assessed on performance.
 - c. The advisory centre on all aspects of the authorizing of Independent Assessors and certification processes.

- d. The receiving centre for complaints against Independent Assessors and the certification process.
- e. A source of training and information for Independent Assessors.

6.4 Responsibilities of the STOW-TT Project Office

- 6.4.1 The STOW-TT Project Office is responsible for executing the decisions of the STOW Implementation Board.
- 6.4.2 The STOW-TT Project Office is responsible for ensuring that the up to date STOW-TT Minimum HSE Requirements for working in the Energy Industry of Trinidad and Tobago are effectively communicated to Independent Assessors and organisations seeking certification.
- 6.4.3 The STOW-TT Project Office is responsible for providing public assurance that the process for authorizing Independent Assessors to work on behalf of the STOW Implementation Board is carried out in an unbiased manner that demonstrates integrity of the process.
- 6.4.4 The STOW-TT Project Office is responsible for developing the:
 - a. Process for identifying and agreeing upon minimum qualifications for authorizing the Independent Assessors based on the Board's recommendations.
 - b. Monitoring system for reviewing the performance of Independent Assessors.
 - c. Process for communicating the qualification requirements to all interested parties.
 - d. Disciplinary process for Independent Assessors based on the Board's recommendations.
 - e. System for maintaining an up to date register of all authorized Independent Assessors.
 - f. System for maintaining an up to date register of all organisations that have been certified as meeting the STOW-TT Minimum HSE Requirements as well as those that were denied certification.

6.4.5 The STOW-TT Project Office is responsible for identifying, sourcing and facilitating the training needs of Independent Assessors to meet the established qualification/s required to qualify as an Independent Assessor to work on behalf of the STOW Implementation Board.

SECTION 7

THE STOW Technical Committee

7.1 Introduction

7.1.1 The STOW-TT Technical Committee, under the guidance of the STOW Implementation Board, has been established to ensure the required quality of STOW audit reports completed by Independent Assessors is maintained. These are individual, professionally qualified HSE specialists who are contracted by the Energy Chamber or who are volunteers of the STOW Charter signatory operating companies. Members of the Committee also review the entire STOW Process and the documents associated with STOW and provide input to the STOW Project Office and the STOW Implementation Board on areas for improvement.

7.2 Governance:

7.2.1 The STOW Technical Committee reports to the STOW Project Office which in turn acts as a liaison between the Technical Committee and the STOW Implementation Board.

7.3 Roles & Responsibilities Of the STOW-TT Technical Committee

7.3.1 Quality Assurance

- Review certification audit reports to ensure that it meets acceptable audit standards
- Where applicable, seek clarification from Assessors or raise queries with Assessors on the content of audit reports
- Liaise with Assessors to finalize audit reports

- Submit finalized audit reports to the STOW Project Office for forwarding to the STOW Implementation Board; and based on the findings, advise the Board whether the Assessor's recommendations should be accepted.
- Report to the STOW Implementation Board on any concerns that can affect the integrity of the process and / or programme objective.
- Report to the Board on the performance of Assessors as they relate to the quality of audit reports.

7.3.2 Advise the Board on Technical Issues

- Make recommendations to the Board on technical issues/ feedback from Assessors/ stakeholders of the programme.
- Make recommendations to improve the quality of audit reports, the effectiveness of Assessors, the STOW process and the overall programme.
- Review the STOW Guidance Manual on an agreed frequency and make recommendations for improvement.
- Make recommendations to the STOW Implementation Board, in accordance with the assessor performance management process, on;
 - o The advancement of assessors to the senior assessor classification,
 - o The demotion of senior assessors to assessor classification; and
 - o The de-listing of assessors and senior assessors.

7.4 Composition of the STOW Technical Committee:

7.4.1 The Committee will include persons who attended the STOW Assessor training and were authorized as Assessors/ Senior Assessors by the STOW Implementation Board, as well as other persons with a suitable combination of qualifications and experience.

7.4.2 All members of the STOW Technical Committee must be approved by the STOW Implementation Board

7.5 Meetings:

- 7.5.1 The STOW Project Office will meet with the STOW Technical Committee at least semi-annually on a specific date to be agreed with the STOW Project Office.
- 7.5.2 Minutes will be taken at each meeting by a representative of the STOW Project Office.
- 7.5.3 A quorum will exist when at least 75% of the Technical Committee is in attendance.

7.6 KPI:

- 7.6.1 Members of the STOW Technical Committee must finalize audit reports within fourteen days of receipt of reports.

7.7 Code of Ethics and Professional Conduct of the STOW-TT Technical Committee

- 7.7.1 Members of the STOW Technical Committee shall at all times abide by and conform to the following Code of Conduct in their capacity as STOW Technical Committee members:
 - 7.7.2 Standards
 - 1. A Technical Committee member shall act with integrity and in an ethical and professional manner in their interactions with each other, the Chairperson, the STOW Implementation Board, Independent Assessors and the public.
 - 2. Technical Committee members shall maintain high ethical and moral character, both professionally and personally, so that their behavior will reflect positively upon the STOW Technical Committee, the STOW Implementation Board and the STOW Project Office.

3. Technical Committee members shall act with competence and shall strive to maintain and enhance their competence and that of their fellow Technical Committee members.
4. Technical Committee members recognize that all decisions and actions are to be based on integrity, competence and independent judgment and shall use proper care and exercise independent professional judgment in the performance of their duties.
5. Technical Committee members shall maintain confidentiality about all matters that are considered in closed meetings and shall only report on those matters to relevant Associations approved by the STOW Implementation Board.
6. Technical Committee members will recuse themselves and will not participate in the consideration of any matter or attempt to affect the outcome of any issue before the Committee when to do so might result in even the appearance of a conflict of interest. When encountering potential conflicts of interest, Technical Committee members will identify the conflict and as required, remove themselves from all discussion and decision on the matter. Specifically, Technical Committee members shall follow these guidelines:
 - a. Avoid placing (and avoid the appearance of placing) one's self-interest or any third-party interest above that of the Committee; while the receipt of incidental personal or third-party benefit may necessarily flow from certain STOW Technical Committee activities, such benefit must be merely incidental to the primary benefit to the Committee and its purposes;
 - b. Do not abuse Technical Committee membership or authority by improperly using Technical Committee membership or the STOW Project Office staff, services, equipment, resources or property for personal or third-party gain or pleasure. Technical Committee members shall not represent to third parties that their authority as a Technical Committee member extends any further than that which it actually extends.
7. Technical Committee members will not abuse their authority by using their offices to obtain favourable treatment by Contractors or any other stakeholder of the STOW programme.
8. Technical Committee members shall exercise due diligence to avoid breaches of duty via negligence, intentional action or omission and

- unauthorized communications with individuals trying to influence by improper means or seeking to receive personal gains through Committee decisions.
9. Technical Committee members shall not engage in conduct that would compromise, discredit or diminish the integrity of the STOW Technical Committee or the STOW programme.
 10. Technical Committee members will refrain from using Committee meetings or the STOW approval processes to advance their personal agenda.
 11. Technical Committee members shall not communicate with companies under consideration for certification approval by the STOW Implementation Board while the assessment is pending.
 12. Technical Committee members shall avoid any relationship with a contractor that could influence any decision to be made by the Committee.
 13. Technical Committee members will not allow their personal relationships with other Assessors to influence their decisions and will limit their discussion with Assessors to matters specific to their assessment report.
 14. Technical Committee members will not work as Assessors or provide STOW related consultancy services to contractors (whether remunerated by the contractor or not). In cases where through personal or work relationships, a Committee member is considering giving an opinion on a contractor's HSE management system, the member must notify the STOW Implementation Board in writing via the Energy Chamber as soon as reasonably practical but before any STOW related work is undertaken with that company.
 15. Technical Committee members will be respectful of each other and will not utilize Committee meetings to upstage or embarrass colleagues.
 16. Technical Committee members will respectfully consider the opinions of others during deliberations, strive for integration of viewpoint or consensus building in decision-making and will respect the judgment of the Committee in regard to its decisions.
 17. Technical Committee members must not accept any offer of gifts or hospitality from any individual or organization which stands to gain or

benefit from a decision the STOW Technical Committee may be involved in determining.

18. Technical Committee members shall not seek or accept or offer directly or indirectly any gifts donations, remuneration, hospitality, illegal payments, favour in whatsoever form howsoever described by contractors, consultants, etc. that is perceived as intended, directly or indirectly, to influence any decision, or act or failure to act to commit fraud, opportunity for committing any fraud.
19. Technical Committee members shall act in accordance with the highest standards of honesty, integrity fairness and ethical conduct while serving on the Committee as well as representing the Committee, without allowing their independent judgment to be subordinated and fulfill the fiduciary obligations.
20. Except as the Committee may otherwise require or as otherwise required by law, no Technical Committee member shall share, copy, reproduce, transmit, divulge or otherwise disclose any confidential information related to the affairs of the STOW Technical Committee and the STOW Project Office and each member of the Committee will uphold the strict confidentiality of all meetings and other deliberations and communications of the Committee.
21. Members of the Technical Committee must work within the guidance of the STOW Charter.

NAME (BLOCK LETTERS)

SIGNATURE

SECTION 8

Independent Assessors

8.1 Introduction

- 8.1.1 The Independent Assessor is an individual who, having demonstrated the necessary qualifications and experience to the STOW Implementation Board, is authorised to assess organisations' compliance with the STOW-TT Minimum HSE Requirements of the Energy Industry in Trinidad and Tobago on behalf of the STOW Implementation Board.
- 8.1.2 There are two levels of Independent Assessors to be established to reflect the level and experience of the Independent Assessor.
- 8.1.3 The reason for two levels of Independent Assessor to exist is to enable the STOW-TT Project Office to meet their mandate of building local capacity for HSE professionals.
- 8.1.4 The first level of Independent Assessor is called "Independent Assessor" and the second level of Independent Assessor is called "Senior Independent Assessor".
- 8.1.5 The Independent Assessor is authorised to assess low risk organisations for certification.
- 8.1.6 The Independent Assessor may not assess service providers at the high risk level and make recommendations about their certification.
- 8.1.7 The Senior Independent Assessor is authorised to assess low and high risk organisations for certification.
- 8.1.8 The Senior Independent Assessor is also authorised to act in a "Supervisory" role for the Independent Assessor.

8.2 Process to become a STOW Independent Assessor

8.2.1 The minimum criteria for an Independent & Senior Independent Assessor to be authorized are:

1. The applicant must submit an application that indicates:
 - a. The name, age, nationality, addresses and contact details of the applicant.
 - b. The academic qualification claimed.
 - c. A copy of the award for the academic qualification claimed. Where academic certificates contain information that is in a language other than English, certificates must be accompanied by a certified translation.
 - d. The name, address and contact details of the accrediting agency that issued the academic qualification.
 - e. Evidence of meeting the practical HSE, oil & gas and auditing experience requirement.
 - f. The name and contact details of suitable referees that may substantiate the validity of the practical experience claimed.
2. Hold a combination of professional HSE Qualification and experience that are acceptable to the STOW-TT Project Office as outlined in Figure 4:

Assessor Certification Criteria 2018

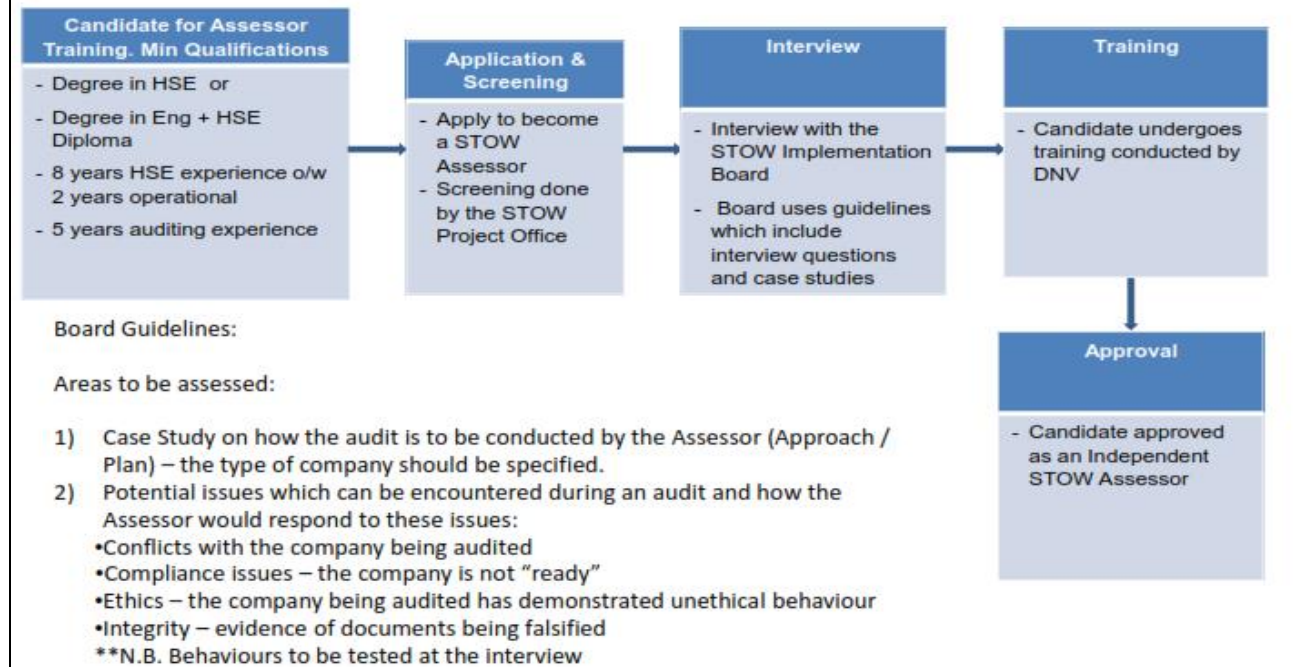


Figure 4 – Assessor Certification Criteria.

3. The applicant for Assessor must also participate in an interview with a sub-committee of the STOW Implementation Board.
4. Once successful at the interview, the applicant must also participate in a five-day training programme, at the end of which, he / she must sit and pass a written paper that is designed to enable them to demonstrate their understanding of the STOW-TT Minimum HSE Requirements and the audit process to a level acceptable to the STOW Implementation Board.
5. If applicants have successfully completed the training programme and are authorized as Assessors, they must complete two STOW Audits under the Mentorship Programme before being allowed to conduct independent audits. To be considered for authorization as a Senior Assessor, an Independent Assessor must complete three (3)

independent low risk audits and the steps outlined in Figure 5 would apply:

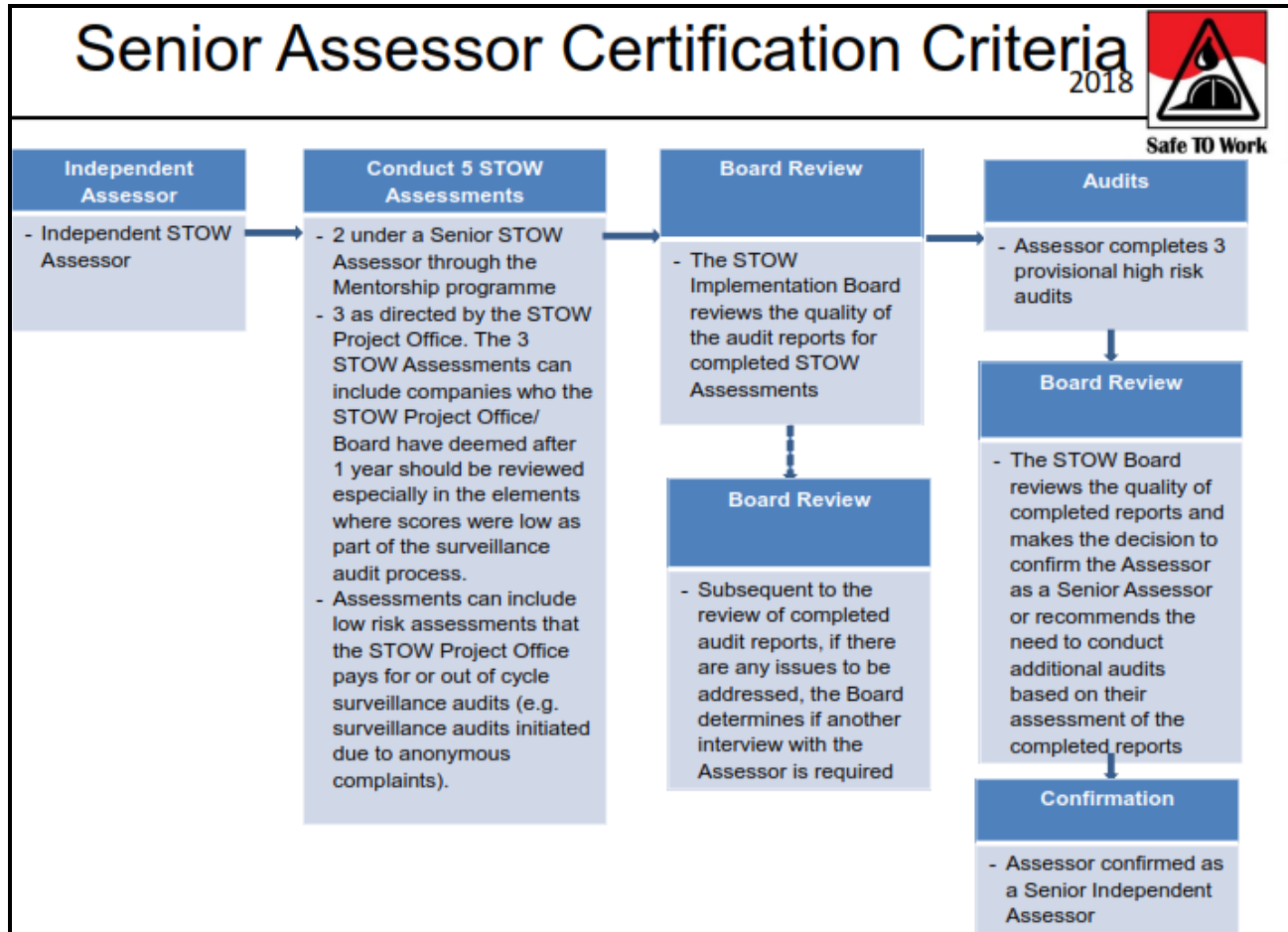


Figure 5 – Senior Assessor Certification Criteria.

N.B. Persons employed with regulatory bodies will not be trained as STOW Independent Assessors to avoid a conflict of interest.

8.3 Code of Ethics and Professional Conduct for Assessors

8.3.1 This Code of Ethics and Professional Conduct is to be observed by Assessors under the Safe TO Work in Trinidad & Tobago (STOW) initiative. Assessors must comply not only with the terms, but also the intent of this Code.

8.3.2 Standards

Independent Assessors have an ethical and professional responsibility to demonstrate the required professional competence (having the required knowledge, training, experience and communication skills to fulfill assigned work tasks) and behaviours in discharging the responsibilities of their role in the Safe TO Work (STOW) Initiative

Independent Assessors must uphold the highest ethical standards and integrity in their professional duties or other activities which might impact on the reputation of Independent Assessors, the ECTT or the (STOW) initiative.

Standards

1. I will always perform my duties as an Independent Assessor honestly, fairly, responsibly, competently and objectively.
2. I will adhere to high standards of professionalism when carrying out assignments. I will avoid all conduct or practice that is likely to discredit Independent Assessors, the ECTT, the STOW Implementation Board or the STOW initiative or deceive clients and the general public.
3. I will refrain from corrupt practices including, but not limited to (i) acts of bribery (ii) extortion or coercion (iii) fraud or (iv) collusion.
4. I will report to the STOW Project Office any corrupt practices by clients or other Assessors to gain certification including offers of bribe, acts of extortion, fraud or collusion. I will not accept gifts of any kind from clients whom I am auditing for STOW certification.
5. I will establish in advance, mutual understanding of the objectives, scope, work plan and fee arrangements as well as the benefits and results of my services. I will adhere to the timeframe for STOW certification assessments set by the STOW Implementation Board. Where an assessment can be completed within a shorter timeframe, I will not unnecessarily extend the STOW assessment.

6. I will seek to establish, maintain and develop business relationships based on confidence, trust and respect. I will always act in a way which supports and upholds the reputation of the ECTT, the STOW Implementation Board.
7. I will only accept assignments for which I possess the prerequisite experience and competence to perform. I will maintain professional knowledge and competence in order to successfully undertake my duties as an Independent Assessor and to do that I will undertake appropriate continuing professional development and record it in an appropriate manner.
8. I will not disclose or use for personal advantage, or for the detriment or benefit of third parties, any proprietary, confidential, commercially-sensitive or personal data acquired as a result of my work as an Independent Assessor.
9. I will avoid potential or known conflicts of interest or the appearance of such and will immediately declare to the client and the ECTT, any such circumstances to ensure that my professional judgement is not compromised or perceived to be compromised. I will offer to withdraw from an assignment when I believe my objectivity of integrity may be impaired.
10. I will not audit a client that I have assisted to implement the STOW Minimum HSE requirements.
11. I will not provide consultancy services to a company that I would have previously audited until at least one re-certification audit has been completed by another Assessor.
12. If within the scope of my engagement, I will advise clients, employees and the ECTT of danger and unacceptable risks to people, the environment or property.
13. I will not advertise my services in a deceptive manner nor will I advertise or attempt to advertise my services during the performance of a STOW assessment.
14. I will respect the rights of and will not slander other Assessors. I will issue public statements only in an objective and truthful manner and only when founded upon knowledge of the facts and competence in the subject matter.

15. I will act in a manner free of bias with regard to religion, ethnicity, gender, age, national origin, sexual orientation, disability or politics.
16. I will work for the advancement of health, safety and the environment and the STOW Initiative by sharing my knowledge.
17. If I perceive a violation of the Code I will report it to the ECTT. I will promote adherence to the Code by other Assessors.
18. I will disclose all material facts know to me that, if not disclosed, may distort the reporting of activities under review during the STOW assessment.
19. I will not participate in any activity or relationship that may impair or be presumed to impair my unbiased assessment of a client's health, safety and environmental (HSE) management system.
20. Nor will I participate in any activity or relationship that may result in a conflict of interest or the appearance of such and will immediately declare to the client and the Project Office circumstances or interests that I believe may influence my judgment or objectivity
21. I will review this Code of Conduct regularly to ensure that I am in conformance with the Code.
22. I will avoid all forms of sexual harassment i.e. any behaviour of a sexual nature that affects the dignity of women and men, which is considered as unwanted, unacceptable, inappropriate and offensive to the recipient, and that creates an intimidating, hostile, unstable or offensive environment.
23. I will always be suitably and professionally attired when conducting my duties as an Assessor.

 Name of Independent Assessor
 (Block Letters)

 Signature

Date

8.4 Complaints & Appeals against Assessors

8.4.1 Assessors are expected to:

- Comply strictly with the Code of Ethics and Professional Conduct and the policies and procedures of the STOW Project Office.
- Use objective evidence as the basis for all audit findings during the assigned STOW audit.

If there is any breach of the above, stakeholders have a right to lodge a complaint against the Assessor.

Ideally, a complaint on either of the above against an Assessor should be forwarded in writing to the STOW Project Office following the complaints procedure (see Section 9.4). A complaint should ideally include:

- the name, position, company name, address, telephone number and signature of the author of the complaint
- in the event of a complaint regarding the comportment of the Assessor, the actions that gave rise to the complaint
- the dates of the alleged violation, if a code of conduct complaint
- the nature of the queries and any supporting documents to assist with the investigation where the complaint concerns audit report findings.

Written complaints should be addressed to the Safe TO Work (STOW) Project Office, The Energy Chamber, Suite B2.03, Atlantic Plaza, Atlantic Avenue, Pt. Lisas or emailed to natalie@energy.tt or keina@energy.tt or ayanna@energy.tt.

Complaints can also be made via the online feedback form on the STOW website.

In the event of an anonymous complaint, the complaint will be documented by the STOW Project Office and it will be investigated by the STOW Implementation Board following the guidelines of the complaint procedure.

8.5 Decision

8.5.1 The STOW IB will render a decision on an objection to audit findings / alleged misconduct of an Assessor in writing, which will include a statement of the reasons for the decision. Only evidence that was put before the STOW IB may be considered as a basis for the decision.

- 8.5.2 The STOW IB's decision may be to:
- accept the Assessor's findings
 - agree with the complainant and request that the Assessor revises the audit report
 - dismiss the case / impose sanction(s) on the Assessor in the case of a code of ethics violation

8.6 Appeals

- 8.6.1 For violation(s) against the Code of Ethics & Professional Conduct, if sanctioned, the Assessor can appeal the decision of the STOW IB within seven (7) days of receiving the decision.
- 8.6.2 Appeals must be made in writing and clearly set out the grounds for the appeal which should be limited to:
- failure of the sub-committee or the STOW IB to follow these Enforcement Procedures
 - material errors of fact
- 8.6.3 Should the STOW IB decide by simple majority to grant the appeal, the Assessor will be informed of the decision
- 8.6.4 The appeal shall be limited to a review of the written record. Only facts up to and including the initial decision will be considered.
- 8.6.5 The decision of the STOW IB is final. The Board will either: -
- affirm the decision in full
 - modify the decision; or
 - reverse the decision, in which case any sanction imposed will be rescinded
- 8.6.6 The Board's decision will be communicated to the complainant by letter, signed by the Chair of the STOW IB.

SECTION 9

Policies of the STOW Certification Programme

9.1 Process for handling complaints

- 9.1.1 The STOW Implementation Board has an established and documented process to ensure that complaints and appeals from stakeholders are handled in a timely and structured way. All complaints are taken seriously.
- 9.1.2 The process is valid for complaints raised by any stakeholder. Stakeholders include STOW Charter Signatory Operating Companies, STOW Assessors, service providers, regulatory bodies and third-party stakeholders (e.g. a customer of a STOW Certified company and other interest groups).
- 9.1.3 A complaint is normally an expression of dissatisfaction sent to the STOW Implementation Board related to:
- An operating company
 - A decision from the STOW Board on the certification of a company
 - The performance of a STOW Assessor
 - The findings of a STOW Assessor on a STOW Audit
 - The performance of a STOW-TT certificate holder (third party complaint)
- 9.1.4 A written complaint can be sent either as an email, via the online feedback form on the STOW website or by letter (see contact information below) and ideally should contain the following:
- Name of the person filing the complaint (not required for online complaints)
 - Company name (not required for online complaints)
 - Post Address and / or email address (not required for online complaints)
 - The name of the person / entity against whom the complaint is being filed (respondent) (not required for online complaints)
 - Details of the complaint

Complaints received via telephone are documented.

9.1.5 The complaint will be handled as follows:

Stakeholder	Process for handling complaint(s)
Operating company	<ul style="list-style-type: none"> - Obtain as much information from the complainant as possible. - Communicate with operating company on the issue. If warranted, use moral suasion for a positive outcome. - Provide feedback to the complainant.
STOW Board: Decision on certification	<ul style="list-style-type: none"> - Complaint is lodged at the next STOW IB meeting for consideration - The STOW IB will either uphold its initial decision or may request additional information / evidence from the complainant - The STOW Project Office / Technical Committee will form an opinion on the information / evidence provided - The STOW IB will decide on the matter and the complainant will be informed
Performance of a STOW Assessor (Ethics)	<ul style="list-style-type: none"> - Obtain as much information from the complainant as possible. - Complaint is lodged at the next STOW IB meeting for consideration - Hold separate interviews with the Assessor and complainant - All information will be tabled at the next Board meeting for a decision - The STOW IB will decide on the matter and both parties will be informed
Performance of a STOW Assessor	<ul style="list-style-type: none"> - The STOW Project Office / Technical Committee reviews relevant documents on the STOW

(Audit Findings)	<p>database</p> <ul style="list-style-type: none"> - If necessary, the Assessor is also interviewed - Complaint is lodged at the next STOW IB meeting for consideration along with the opinion of the STOW Project Office / Technical Committee - The STOW IB will decide on the matter and both parties will be informed
Performance of a STOW-TT certificate holder	<ul style="list-style-type: none"> - Obtain as much information from the complainant as possible. - Complaint is lodged at the next STOW IB meeting for consideration - Communication is sent from the STOW Project Office to the certificate holder for a response on the complaint and requesting any pertinent evidence - The STOW Project Office / Technical Committee reviews relevant evidence and forms an opinion - All information will be tabled at the next Board meeting for a decision along with the opinion of the STOW Project Office / Technical Committee - The STOW IB will decide on the matter and both parties will be informed. If the complaint was lodged anonymously, only the certificate holder will be informed.

9.2 Process for appeals

9.2.1 When the STOW Project Office receives an appeal e.g. related to a complaint decision or a certification decision (including e.g. suspension / withdrawal), the following will apply:

- The appeal is registered by the STOW Project Office
- Receipt of the appeal shall be acknowledged to the appellant.

- The case and appeal will be handled by a sub-committee of the STOW Implementation Board who would not have been previously involved in the disputed decision.
- Appellant shall be informed in writing about the output / decision of the appeals-handling process.
- Proper records from the appeals process shall be retained.
- The Board's decision at the end of the appeals process shall be considered final.

9.3 Process for suspension of STOW certification

- 9.3.1 A decision to suspend certification of a STOW-certified company will be taken solely by the STOW Implementation Board. Failure by the company to resolve the issues that have resulted in suspension within six (6) months shall result in withdrawal or reduction of the scope of certification. Once a decision is taken to suspend / withdraw certification, the company's status will be updated on the STOW database and the STOW website within fourteen (14) calendar days from suspension or withdrawal of a company's certificate.
- 9.3.2 The STOW Implementation Board may, at its discretion, suspend a company's certification for a period not to exceed (6) months in the event that:
- the client is unable or unwilling to maintain or comply with the STOW-TT requirements;
 - the client is found to be ineffectively maintaining the certified HSE management system (identified during assessment through excessive non-conformity and /or through verified customer / stakeholder complaints);
 - a major part of the client's HSE management system has not been maintained;
 - the client is requesting to voluntarily suspend certification;
 - the client is unable to have a surveillance audit conducted or unwilling to allow access to their facility / area by the assigned STOW Assessor or other STOW Audit personnel for surveillance audits during the certification period;
 - the client is unable or unwilling to address HSE concerns or issues associated with the facility / site(s);

- the client is unable or unwilling to comply with new requirements of the STOW-TT certification programme;
- the client is found to be in violation of the terms and rules for use of the STOW marks (logo and acronym) and / or STOW certificate;
- the client is unable or unwilling to meet financial obligations (pay STOW fees);
- the client's management system does not reflect the current organisation and processes, e.g. as a result of changes, acquisitions, diversification etc.;
- the client has failed to declare any HSE violations;
- the client fails to inform the STOW Project Office of any changes that can affect certification (change in location or to the HSE management system etc.)

9.3.3 The decision to suspend a certificate shall be communicated to the client by a formal letter. The letter shall include:

- A statement on the decision to suspend the certificate including a proper description of the situation, argument and reference to objective evidences;
- The right to respond and appeal the decision within ten (10) working days through the complaints procedure;
- Start date of the suspension (normally from the date of receipt of the letter);
- Conditions and due date of required action in order to revoke the suspension and the consequence if satisfactory actions are not performed;
- The means of follow-up by the STOW Implementation Board to verify that conditions have been met and required corrective actions have been implemented;
- A statement that the STOW certificate is invalid during suspension and that use of all advertising matter containing a reference to certification are prohibited during the period of suspension;
- A statement that both the client and the STOW Project Office shall inform all enquirers that the STOW certificate is suspended;
- A STOW certificate shall not be suspended for more than six (6) months.

9.3.4 The STOW Implementation Board will verify that conditions are met and that requested corrective actions are implemented. Dependent on this verification, the STOW Implementation Board will either:

- Declare a positive result, revoke the suspension and declare a valid certificate. The certificate will expire as per the previous period.
- Declare a negative result due to failure to resolve the issues that resulted in suspension. This situation will normally result in withdrawal of the STOW certificate.
- In either case, the client will receive a letter confirming the result.

9.4 Process for withdrawal of STOW certification

9.4.1 The STOW Implementation Board may, at its discretion, cancel / withdraw STOW certification for any of the following reasons:

- the conditions for removal of a suspension have not been met;
- a suspension is not considered to be an adequate action;
- the client is unable to have a surveillance audit conducted or unwilling to allow access to their facility / area by the assigned STOW Assessor or other STOW Audit personnel for surveillance audits during the certification period;
- client has been found during the surveillance audit process to have seriously abandoned the management system and withdrawal is required;
- formal request by the client;
- client does not or cannot ensure conformance to new requirements of the STOW-TT certification programme;
- client ceases to supply the services under the scope of certification;
- client is unwilling to pay fees associate with becoming certified;
- client no longer complies with the terms and conditions of the STOW-TT certification programme agreement.

9.4.2 The decision to withdraw a certificate shall be formally communicated to the client including the requirements to:

- terminate the use of the STOW Logo and / or acronym and any reference to certification
- re-apply for certification when the company has addressed all non-conformances which would have resulted in withdrawal of certification.

9.4.3 The client has a right to appeal. An appeal may be lodged through the complaints procedure.

9.5 Request for reduction of the scope of STOW certification

9.5.1 A company may make a formal request in writing to the STOW Project Office to reduce the scope of services for which they were certified.

9.5.2 The company must outline the reason(s) for reduction in the scope and detail the services which should be included on the STOW certificate. Once approved by the STOW Implementation Board, a company making a request for a reduced scope, should note the following:

- the duration of certification shall not be extended for any reason

9.6 Reduction of the scope of STOW certification by the STOW Implementation Board

9.6.1 The STOW Implementation Board may reduce the scope of services for which a company is certified dependent on the outcome of the surveillance audit.

9.6.2 A reduction in scope may arise if a company was unable to demonstrate that they are maintaining aspects of their HSE Management System relative to the scope of services for which they were previously certified / applied for.

9.6.3 Where the Board has taken the decision to reduce a company's scope of certified services, the company will be notified in writing of the decision.

9.6.4 The company's certificate will be updated to reflect the reduced scope of activities. The duration of certification shall not be extended.

9.7 Process for adding services / sites to the STOW certificate

9.7.1 Where a contractor makes a request for additional services / sites, the contractor must send written correspondence to the STOW Project Office advising of the services / sites to be added. The following will apply:

- In certain circumstances, the Assessor will not be required to complete a full audit report i.e. providing responses to the full suite of 135 questions but should use professional judgment in determining which questions would apply where a contractor requests an additional service / sites.
- If the above applies, the contractor will be billed for two assessment days (one day to facilitate the document review and the physical conditions tour and one day to allow for the Assessor to complete the audit report).
- At times, based on the services that the contractor wishes to add & the associated hazards and risks, a full audit may be required. This will be determined when the contractor makes the application on the STOW Database.
- An application fee of 30% of the standard application fee will apply.
- A certification fee of \$500.00 plus VAT will apply.
- A qualitative report without scores will be accepted since this report would have to be linked with the previous audit report.
- The certification period will not change except where a full audit was conducted.
- A contract and quotation will be sent to the contractor outlining the applicable audit fees.

9.8 Process for surveillance audits

9.8.1 Background

One of the central pillars of management systems is continual improvement. Subsequent to the establishment of a management system and assigning responsibilities for the implementation of a management system, it is important to determine if the system is functioning the way the organisation originally intended and if there are gaps, determining the measures needed to close these and improve the performance of the system.

The aims of continual improvement include ensuring compliance, identifying gaps in the system and identifying measures to improve the performance of the management system. One way to verify that companies continue to maintain and improve their management systems post certification is through surveillance audits.

Unlike the STOW Certification and Re-Certification audits, surveillance audits entail a review of parts of an organisation's operations and management system. The surveillance audit focuses mainly on the following: systems performance and maintenance, preventative and corrective actions and processes and the effectiveness of the internal auditing process. Surveillance audits are not fault-finding exercises but rather, are designed to assist companies to improve the performance of their management system by addressing gaps and ensuring prompt closure of non-conformances. This in turn would assist in risk mitigation and improving the HSE Performance of the oil & gas sector in Trinidad & Tobago.

9.8.2 Objective:

1. To ensure that companies continue to maintain their HSE Management System after achieving certification
2. To ensure that companies have a plan of action for identified non-conformances and that all non-conformances are adequately addressed within specified timeframes to ensure continuous improvement of the management system
3. To identify any changes to an organisation's management system and the risks associated with these changes.

9.8.3 Context:

Contractors are currently STOW certified for a period of 1 or 2 years dependent on the scores obtained in the eleven (11) STOW Elements and the Physical Conditions Tour. At the end of the certification period, contractors are required to submit an application via the STOW Database for re-certification.

Although STOW Assessors note contractors' non-conformances on the non-conformance checklist and contractors are required to provide dates for closure of these non-conformances, there is no verification of closure of non-conformances until the re-certification audit. Dependent on the nature of these non-conformances, there can be negative fall outs regarding the HSE performance of contractors and subsequent impact to STOW Charter signatory companies' sites

where work is actually carried out by contractors. Surveillance audits would assist in the closure of non-conformances and adherence to required HSE practices.

9.8.4 Framework:

- Surveillance audits will be conducted as follows:
 - at the six-month interval from the date of certification for companies who were awarded certification for one (1) year and
 - at the 1-year interval from the date of certification for companies who were awarded certification for two (2) years.
- The requirement for surveillance audits is included in the STOW Assessment Contract.
- Surveillance audits should last no longer than one (1) audit day. Where there may be any exceptions due to the nature of the non-conformances and the extent of the audit scope, this will be addressed by the STOW Project Office / STOW Implementation Board. If the STOW Assessor is required to re-visit a company pertaining to the identification of high-risk (major) non-conformances, the company will be charged an additional fee of one assessment day for each day that the Assessor is required to re-visit.
- In the first instance, the following will be considered when selecting companies for surveillance audits:
 - High Risk Companies with ≥ 10 non-conformances.
 - Non-closure of legislative non-conformances
 - Repeated legislative non-conformances
 - Complaints received from client companies on the HSE performance of a company
 - Incidents in the public domain which are brought to the attention of the STOW Implementation Board
 - Random selection by the STOW Project Office to ensure that companies not captured by the aforementioned criteria are also considered for surveillance audits
- Upon completion of the surveillance audit, companies must complete a root cause analysis of identified non-conformances, identify corrective measures and submit a corrective actions plan for addressing same within thirty (30) days of the closeout meeting.
 - Companies must email the corrective actions plan to the STOW Project Office
 - The STOW Project Office will forward same to the Assessor for verification.
 - Minor non-conformances must be addressed within thirty (30) days of completion of the review of submitted documents.

- For major non-conformances, the STOW Project Office / STOW Board will determine the timeframe, since additional time may have to be allotted to address non-conformances. Companies must be able to demonstrate that actions are actively being taken to effectively address the major non-conformance(s).
- If necessary, a re-visit may be scheduled to the company after review of submitted documents to assess the HSE Management System pertaining to the major non-conformances.
- Dependent on the outcome of this audit, if it is determined that major non-conformances were not adequately addressed, a decision can be taken to suspend / withdraw STOW Certification.

N.B. For major non-conformances, one month is predicated on companies taking specific action while working on the closure of said non-conformances.

9.8.5 **Scope of Surveillance audits:**

Apart from the areas identified above, the surveillance audit will focus on a number of areas of the HSE Management System including:

- Management Reviews
- The closure of non-conformances identified in the certification / re-certification audit
- HSE Management Leadership & Accountability
- Legal Requirements & Document Control
- The Risk Assessment & Management Process
- HSE Competence & Training
- Systems for reporting, investigating & managing incidents and
- Systems for the identification of emergency situations & consequences (See Appendix 4).
- If any other areas of concern outside of those identified in Appendix 4 are identified, the Assessor can audit these areas during the surveillance audit.

9.8.6 **Suspension / Withdrawal of STOW Certification:**

STOW Certification can be suspended where it is determined that an organisation's management system has persistently or seriously failed to meet certification requirements, including requirements for the effectiveness of the management

system. Where an organisation does not allow for conducting required surveillance audits as stipulated in the STOW Assessment Contract, certification can also be suspended.

Dependent on the outcome of the surveillance audit, certification can be suspended due to any of the following:

- Non-closure of legislative non-conformances
- Repeated legislative non-conformances (identified during the last STOW Certification / Re-Certification Audit and either not addressed or not adequately addressed). Where a legal notice of violation was issued and the company is awaiting feedback from the legislative body, the Assessor should take this into consideration and should note same. The company may have addressed a violation but may be awaiting feedback.
- Failure of mandatory questions (suite of 16 questions)

In the event of suspension of certification, STOW Certification will become temporarily invalid. A root cause analysis will be conducted and the company will be advised of the timeframe required for addressing the non-conformance(s) which led to the decision to suspend certification. If there is evidence of closure of non-conformances within the specified timeframe, certification will be restored. Where non-conformances have not been addressed, certification can be withdrawn and the organisation would have to apply for STOW Certification. Note that in the event of suspension / withdrawal of certification, the organisation would not be allowed to use the STOW Logo or any marks associated with STOW. STOW Charter Signatory Companies will be notified of a decision to suspend / withdraw certification.

Appendix 1 – Certification Levels Description

1 No Certification Required

- 1.1 This is the category of certification that applies to companies whose risk profile is so low that the cost in time, money and other resources to achieve STOW Certification is not reasonably practicable.
- 1.2 Where no certification is required, the service provider is required to make an authorised self certification that states the service provider will always conduct their operations in such a way as to enable identification, monitoring and maintenance of their processes so as to remain within the minimal applicable HSE related legal requirements of the country in which they conduct operations.
- 1.3 Limited examples of the type of service that may be provided by service providers without the need for certification are:
 - a. Routine delivery of non-hazardous materials or equipment from suppliers.
 - b. Suppliers based off site that simply maintain stock in order to service multiple clients including but not limited to those in the energy industry.
 - c. Simple domestic services that are considered to have very low or insignificant risk.
 - d. Occasional visitors, observers or consultants that introduce little or no risk to the work process.

2 Low Risk Certification

- 2.1 Low risk operations are defined as those that the operator considers to present limited risk of injury, damage to equipment or damage to the environment.
- 2.2 Limited examples of the type of service that may be provided by service providers who are awarded Low Risk Certification are:
 - a. Service providers that only carry out their work in administration buildings or areas that are remote from plant and equipment and

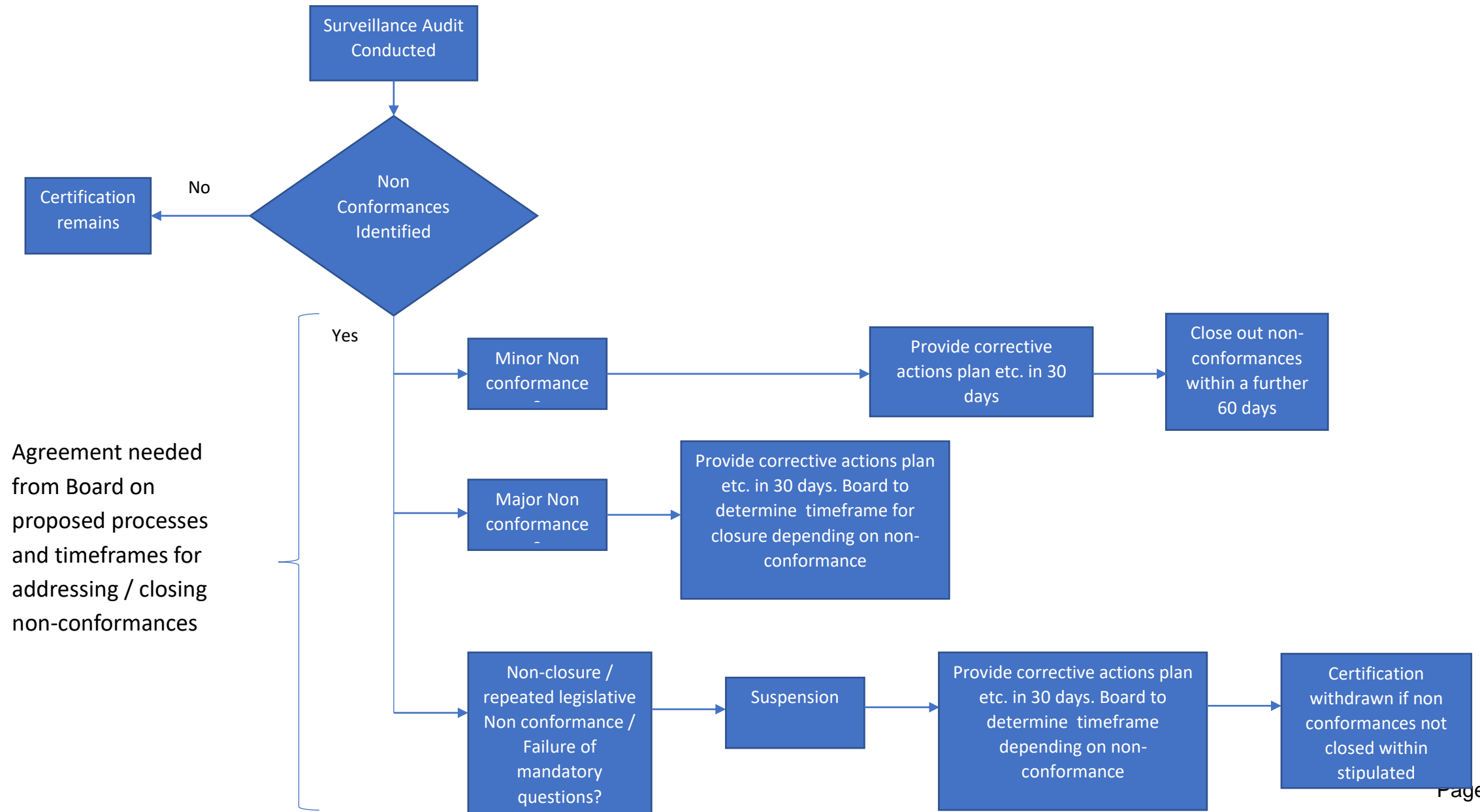
where that work has no direct impact on the hydrocarbon process plan or facilities.

- b. Simple landscape gardening and grounds maintenance in non-hazardous areas that do not involve digging, trenching or excavating more than twelve inches below ground level.
- c. Routine work in warehouse areas located outside of designated hazardous areas.

3 High Risk Certification

- 3.1 High risk operations are defined as those that the operator considers to present significant risk of significant injury, damage to equipment or damage to the environment, where the potential frequency of occurrence and type of harm that may occur makes the risk realisation an unacceptable concept.
- 3.2 Limited examples of the type of service that may be provided by service providers with High Risk Certification are:
 - a. Services that require electrical isolation and may include re-routing or installation of electric supply cables up to and including three-phase, 440v power lines.
 - b. Lifting operations that are carried out by fixed or mobile lifting equipment, including marine vessel loading or unloading and including operations in hazardous zones.
 - c. Drilling Contractor Services.
 - d. Refinery maintenance services.
 - e. Removal & disposal of spent catalyst.
 - f. Pipeline construction and repair services.
 - g. Electrical power plant installation and maintenance services.
 - h. Aircraft operator services.

Appendix 2 STOW SURVEILLANCE MONITORING PROCESS FLOW CHART



Glossary

ASA	Advanced Safety Auditing
AUOTT	Association of Upstream Operators of Trinidad & Tobago
T-BOSIET	Tropical Basic Offshore Safety Induction & Emergency Training
EMS	Environmental Management System
ERP	Emergency Response Plan
GRTT	Government of the Republic of Trinidad and Tobago
HSE	Health Safety & Environment
IADB	Inter-American Development Bank
OCAM	Operating Company Association Member
OPITO	Offshore Petroleum Industry Training Organization
PLEA	Point Lisas Energy Association
PPE	Personal Protective Equipment
ECTT	Energy Chamber of Trinidad & Tobago
STOP	Safety Training Observation Program
OGUK	Oil and Gas UK

Reference

Safety Training Observation Program (STOP)

<http://www.training.dupont.com/safety-training>

Tropical Basic Offshore Safety Induction and Emergency Training

<http://www.opito.com/media/downloads/tbosiet-tfoet-thuet.pdf>

Trinidad and Tobago Environmental Management Act, 2000

http://www.energy.gov.tt/wp-content/uploads/2013/11/Environment_Management_Act_.pdf

The Occupational Safety and Health Act, 2004

http://rgd.legalaffairs.gov.tt/Laws2/Alphabetical_List/lawspdfs/88.08.pdf

The Occupational Safety and Health (Amendment) Act. 2006

<http://www.ttparliament.org/legislations/a2006-03.pdf>

Oil and Gas UK (OGUK)

<http://oilandgasuk.co.uk>

Qualified Doctors registered in Trinidad & Tobago

<http://oilandgasuk.co.uk/doctors-listing.cfm>

The Petroleum (Amendment) Act, 2000

<http://www.ttparliament.org/legislations/a2000-79.pdf>