



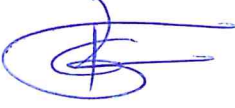


HSE requirements for the transport of Hazardous Goods

Specifications

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1. PURPOSE

The purpose of this document is to define the minimum HSE requirements for the management of fleet of vehicles carrying hazardous goods (white oils, black oils, LPG, lubricants and bitumen).

2. SCOPE

Those specifications / requirements apply to any transporter having at least 1 permanently contracted vehicle with one of RUBIS ENERGY Company listed below:

- RUBIS ENERGY Kenya
- RUBIS ENERGY Rwanda
- RUBIS ENERGY Uganda
- RUBIS ENERGY Zambia
- RUBIS ENERGY Burundi
- RUBIS ENERGY Ethiopia

3. DEFINITIONS

Permanently contracted vehicle: vehicles for the transport of hazardous goods directly contracted by a RUBIS ENERGY company for a period exceeding 1 year.

Accidents: unexpected event generating either harm to people, damages to assets or damage to the environment.

Near Miss: unexpected event without consequences but could have resulted to an accident with slight changes in parameters or conditions.

Unsafe act or condition: act or working condition that might cause an accident or aggravate consequences of an accident.

Incident: Generic term for unsafe act and conditions, near miss and accidents.

LWI: Lost Working day Injury / Occupational accident with victim unable to resume work the next working day.

PPE: Personal Protective Equipment

EPRA: Energy & Petroleum Regulatory Authority

HSE: Health, Safety and Environment

4. LEGAL COMPLIANCES

The organization must operate within the legal requirements of the country of operations. TRANSIT GOODS vehicles shall comply with laws and regulations of all countries they may operate.

The legal compliances apply to:

1. Driver

- to be in possession of a valid driver's license and the necessary qualifications to drive the truck and the goods transported.
- To be in possession of all required special permit / license to drive the vehicles in the country he may circulate (Ex: EPRA License in Kenya)
- Comply with the road traffic rules as laid down by each country traffic rules.

2. Prime movers and trailers

The transporter shall ensure that its vehicles are compliant with all legal requirements for the countries in which the vehicles will operate . This include the timeous renewal of local authorizations / permits and appropriate licenses ¹.

5. HSE MANAGEMENT SYSTEM

Every transporter permanently contracted shall have implemented a HSE management system including as a minimum the following elements:

5.1. HSE Officer / manager

Any transporter having 10 or more permanently contracted vehicles with RUBIS Energy shall have a HSE officer / manager reporting directly to the Managing Director and independent from the Operations.

5.2. Incident /Accident reporting and investigation

All accidents must be immediately reported to the RUBIS Distribution / transport Dpt. An official notification must be sent to RUBIS Distribution / transport Dpt within a maximum of 6 hours from the time of the incident. This shall be done by RUBIS digital solution when available and access provided to the transporter.

Accidents with actual severity 2 or more (see Matrix in Annexure A) shall be investigated and a formal report shared within no more than 2 weeks. The investigation will be subsequently reviewed with RUBIS Distribution / transport team and QHSE team.

The investigation report shall take the format of the template F/ALL/REEA/TRP/01 .

All Accidents, Potential incidents, near misses and unsafe situations shall be logged in a register "PI register" which shall then be shared with the local affiliate's Distribution team on a monthly basis.

5.3. Vehicle daily inspection

The vehicles shall be inspected daily by their drivers before any usage based on a form approved by the local affiliate's Distribution team.

A formal company procedure shall explain how the driver has to report any deviation and how the company engage / manage remedial actions.

5.4. Safe load / offloading pass

Transporter to comply with rules and procedures relative to vehicle inspection before to access to depot for loading or offloading.

Where a digitalized inspection system is implemented, the transporter to be provided with an access in order to:

- Log / update vehicles data (registration number, last calibration certificate,..)
- Log / update driver data (name, last Defensive driving training certificate..)
- Records curative actions taken (when a truck will not pass the inspection, the transporter will be notified and an action plan will be automatically generated for the transporter to complete before to be able to show the truck to any other RUBIS depot)

5.5. Training and awareness

5.5.1. Training management system

The transport company shall implement a training system to:

- o Identify training requirements with refresher periodicity (as a minimum, Job descriptions shall be available and up to date for all positions),
- o Schedule training for all staff (an annual training plan to be issued)

5.5.2. Mandatory trainings

Any driver working for a transporter contracted by RUBIS ENERGY must undergo to:

- o Defensive driving training with in-cab assessment with refresher at least every 3 years
- o Be trained by a competent body to the transport of hazardous goods with refresher every 2 years
- o Emergency response and fire-fighting with 3 hours refresher every year
- o Be trained to Rubis procedures for loading and discharging operations relative to the type of truck they drive with 3 hours refresher every year. This shall be managed by the local RUBIS Energy Depot or Front Offices and includes:
 - o Site safety induction (for RUBIS ENERGY Operated Depot)
 - o Site loading procedure (for RUBIS ENERGY Operated Depot)
 - o RUBIS white oil discharge procedure (for driver carrying out white oil deliveries to RUBIS retail network)

All driver assistants to attend Product safety awareness training with 2 years refresher.

5.5.3. Tool box meeting

Drivers to attend tool box meeting / safety awareness at least every 2 weeks led by a transporter HSE officer. The material can be provided time to time by RUBIS ENERGY following a LFI. Those tool box meeting must be recorded.

5.6. Induction

For any new driver onboarded to drive a vehicle under a RUBIS ENERGY contract, the transporter shall ensure that

- Mandatory trainings listed in 5.5.2. have been completed and not overdue before driver commencement on RUBIS ENERGY contract.
- Driver has been trained to
 - RUBIS ENERGY specific rules, policies and activities listed in this document
 - The good use of the PPE

5.7. Emergency Response

A relevant Emergency Response Plan shall be developed for all type of product transported. As an indication the Emergency responses plans must cover at least the below scenarios:

- Road accident (collision)
- Truck roll over
- Spillage
- Fire
- Hijacking

The Emergency Responses plan must include:

- Emergency notification process
- First counter measure to be undertaken by the driver for each scenario
- Counter measures by the company for each scenario
- List of resources (internal or external) such as spillage recovery team...
- Emergency phone numbers
- Contract or SLA for Spillage recovery with a qualified company covering all country of transporter operations (not applicable to the transport of LPG).

The transporter shall declare to the relevant government entities any accident as per required by local legislation.

Transporter to provide proof of declaration to RUBIS ENERGY.

5.8. GPS tracking System

Any permanently contracted vehicles by RUBIS Energy shall be fitted with a RUBIS approved GPS tracking system and transporter to provide full monitoring access to all vehicles working under a RUBIS ENERGY contract.

The RUBIS ENERGY approved systems are **C-Track and Mix-Telematics**.

This section shall be read with the RUBIS vehicles technical specifications.

5.9. On-board cameras

On board camera shall be fitted on the vehicles.

The minimum expectation is a dash cam fitted in the cabin to monitor the cabin and the road with a minimum memory of 2 hours records (to be able to records the last 2 hours the vehicle was in movement).

In addition, each affiliate may decide to implement higher requirement according to the criticality of the activity specially in terms of security. For example, on a LPG cylinders truck the affiliate may require to install additional video cameras to control goods with remote access to the camera.

5.10. PPEs

Full set of PPE must be provided to each drivers. Transporter to include relevant allocation and renewal policy to ensure that PPE are available and in good order to work at any time.

The table below presents the minimum RUBIS ENERGY requirements (for drivers and assistants).

	White oil	Bulk LPG	LPG Cylinders and Lubricants
Safety helmet	X	X	X
Safety shoes	X	X	X
Safety goggles	X		
Face shield		X	
Leather apron		X	
Gloves	X	X	X
Fire retardant overall	X	X	X
Safety harness	X		

5.11. Driving / working hours

The below rules applies. Note that if the local regulation is stringent, then the local law prevails.

Criteria	Rule
Working hours range	4 am – 8 pm
Max daily working time	10 hours
Max daily driving time	8 hours
Max continuous driving time	4 hours
Resting time	30 minutes for 4 hours driving
Minimum continuous daily resting time	11 hours
Weekly rest	36 hours continuous every 7 days

Any driving time over the legal or above limits must be previously approved by RUBIS ENERGY Distribution / Transport Dpt.

Transporter to maintain drivers driving hours records through GPS tracking system report.

5.12. Health program

The transporter shall implement a health program including as a minimum:

- Annual medical check to assess driver “fit for duty”
- Encourage drivers to inform their proactively supervisor of any disability or condition that could prevent driving safely (taking medicine)

5.13. Alcohol Policy

RUBIS ENERGY Alcohol policy is a TOLERANCE 0 policy.

All drivers to pass breathalyzer test before access to a RUBIS ENERGY Depot. The test is considered failed as soon as alcohol is detected. If so a second test will be performed in presence of the Depot Manager. If the presence of alcohol is confirmed the Transporter will have to bring the driver for blood test. The driver will be banned from RUBIS ENERGY fleet if:

- Presence of alcohol is confirmed by the blood test
- Blood test has not been performed within 2 hours.

For any accident with severity 2 or greater or likely to reach those levels, the driver will have to go for blood test within the best delay. The driver will be banned from RUBIS ENERGY fleet if:

- Presence of alcohol is confirmed by the blood test.
- Blood test has not been performed within 6 hours.

5.14. RUBIS general traffic rules -guidelines

In addition, the below rules shall apply:

- Drivers and assistant must always wear a seatbelt with 3 attachment points in a moving vehicle.
- The use, by the driver, of radio link systems, walkie-talkies (except listening mode) and/or mobile phones, with or without hands-free devices (hands-free kits, Bluetooth, etc.), is prohibited when the vehicle is in motion.
- No carrying of unauthorized passengers.
- The maximum speeds are:
 - 50 km/h in urban area
 - 70 km/h on national road and motorway
- No repair shall take place:
 - Inside Depot boundaries without prior consent of the local Depot Manager
 - On a Retail station without prior consent of the country Distribution Manager

In the event that the request be rejected, transporter shall arrange towing of the vehicle by qualified company.

Should a driver or assistant be caught breaching one those rules, RUBIS ENERGY will have the right to ban the infringing person from RUBIS ENERGY fleet.

6. Maintenance

Maintenance on the vehicle shall only be carried out by qualified mechanics and technicians, approved by the transporter. This applies either to maintenance in transporter workshop or breakdown assistance on the road.

6.1. Preventive maintenance

Transporter company shall establish for each type of vehicle a comprehensive maintenance plan based on:

- Vehicles manufacturers recommendations
- Legal requirements
- Good practices
- Industry or RUBIS ENERGY Learning from Incidents
- Audits

A system must be implemented for:

- Scheduling maintenance and service
- Record for all vehicles all maintenance and services (preventive and breakdowns)

A bi-annual analysis of the breakdown must be held to identify relevant preventive actions.

Transporter shall be able to issue on monthly basis the below KPI:

- % of monthly maintenance achieved on time vs plan
- Repair cost and preventive maintenance cost per vehicle

6.2. Breakdowns

Transporter to seek assistance to:

- Distribution Manager for any breakdown assistance to engage on customer facility or retail station
- Depot Manager for any breakdown assistance to engage within RUBIS Depots or RUBIS owned parking yard.

7. Activity report

Transporter to communicate on monthly basis (by the 5th working day of the following month) a report with the following data per activity (type of vehicle):

- Monthly mileage
- Monthly volumes transported (in m³ except LPG in tons, LPG cylinder container shall be excluded of the calculation)
- Sum of Tons.km (sum of the all trips tons(m³) x km)
- Qty of breakdown with vehicle immobilized for more than 24 hours
- Qty of LWI
- Qty of loss days attached the monthly LWIs reported
- Qty of spillage greater than 200 liters
- Qty of vehicle used
- Total driving time

- Total working time
- Total invoice

The RUBIS Transporter QHSE performance report F/ALL/REEA/TRP/02 shall be used for this purpose

The transporter shall also send with its monthly performance dashboard a report to expose all HSE activities carried out during the months such as:

- Accident investigation
- Training
- Tool box meetings
- Disciplinary actions
- Internal HSE Dashboard / statistics
- Any initiative / project engaged to improve HSE performance
- Etc

8. Objectives:

At the beginning of the contract and on an annual basis, objectives are agreed with RUBIS Distribution and Transport department.

- These objectives shall as a minimum be restricted to;Qty of PI event reported per vehicle
- Qty of accident with severity greater than 2
- Product gain loss vs total qty loaded
- Breakdown per 100,000 km
- % preventive maintenance achieved on time

Annexure A : Accident Severity Ranking Matrix

SEVERITY	CONSEQUENCES		
	P	A	E
	People	Assets (Business loss) (x 1000 USD)	Environment
0	No injury or health effect No consequence	No damage No consequence	No effect No Consequence
1	Slight injury or health effect First aid case and medical treatment case No absence	Slight damage < 10	Slight effect Spillage < 100 liter
2	Minor injury or health effect Reversible health damage LWI* (<= 5 days)	Minor damage >= 10 <100	Minor effect Spillage (liter) >= 100 < 1.000
3	Major injury or health effect Irreversible health damage LWI* (> 5 days)	Moderate damage >= 100 < 1.000	Minor effect Spillage (liter) >= 100 < 1.001
4	Permanent total disability or up to three fatalities	Major damage >= 1.000 < 10.000	Minor effect Spillage (liter) >= 100 < 1.002
5	More than three fatalities	Massive damage >= 10.000	Minor effect Spillage (liter) >= 100 < 1.003

Annexure B: Accident Investigation Supporting Documents

Below is the list of basic documents /data that are required from the transporters after a vehicle accident.

1. Accident report as per form F/ALL/REEA/TRP/01
2. Detailed Driver statement / report.
3. Photos of the accident's scene if available with as much details as possible. The photo should clearly show our contracted truck, the other vehicle/ vehicles involved, the road, surrounding environment that may help us highlight the hazards in that area that may have contributed to the accident.
4. GPS Tracking report for the 7 days up to the current trip showing movement from time of release from the depot to the time of accident.
5. Dashcam video record (at least 60 seconds before accident and 60 seconds after)
6. Traffic Police report.
7. Copy of trucks logbook.
8. Copy of trailers logbook if applicable.
9. Last annual inspection report by local transport authority (NTSA in Kenya).
10. Drivers training records / copy of his ID/ copy of his DL/ Copy of his EPRA pass.
11. Vehicle maintenance reports. Both scheduled preventive maintenance schedule and actuals breakdowns repairs done on the trucks over the last two months.
12. Driver employment contract
13. Organization chart + Job description of the key ops staff.

Last loading details.

14. Loading order for the specific order.
 15. PDF – Product Delivery Form – Fully filled/completed at the station.
 16. White oil discharge form – Fully signed by the driver and station. – white copy is the transporters copy.
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17. Drivers Medical report after discharge to show fitness to continue working.