

HSE Plan

Health, Safety and Environment

	<h1>HSE Plan</h1>	
--	-------------------	--

Revision Nr.: 1	Revision Date: xxx	Document : HSE Plan	Page 2 of 19
-----------------	--------------------	---------------------	--------------

Table of Content

1.	Introduction	page 3
2.	HSE Objectives	page 4
3.	EFG Scandinavia contractor management	page 5
4.	Overview of environmental management	page 5
5.	Environmental aspects	page 7
6.	Measures	page 8
7.	Risk Assessment	page 9-10
8.	Emergency scenarios	page 11
9.	Emergency Preparedness and Response	page 12
10.	Commitment to the Code of Conduct	page 13-14
11.	Contact Details	page 15
Annex 1:	Copy of EN ISO 9001:2015, EN ISO 14001:2015 and EN ISO 45008:2018 certificate	page 16
Annex 2:	Company Policy	page 17-18

	<h1>HSE Plan</h1>	
--	-------------------	--

Revision Nr.: 1	Revision Date: xxx	Document : HSE Plan	Page 3 of 19
-----------------	--------------------	---------------------	--------------

1. Introduction

The EMS-FEHN-Group's (EFG) HSE Plan is developed and implemented in the intention to minimize the risks of accidents and incidents to people, equipment, material and the environment. EFG Scandinavia, as part of EFG, underlies these set out regulations and undertakes it's utmost to grant the best services with highly experienced and skilled personnel and subcontractors.

Contractors and suppliers are the key to our business performance, and the capabilities and competencies to perform transportation on our behalf are assessed continuously. By monitoring subcontractors' performance, it can be ensured that our image of safety and environmental friendly processes are aligned with these contractors and provided to – and beyond – the customer's satisfaction.

Generally, all applicable laws, provisions and regulations – national and international – are to be followed during the whole service process. Additionally, the environmental support as well as safe handling of cargo is mandatory for service providers carrying out transports on our behalf.

EFG provides all required resources for supporting the occupational health and safety, not only for employees of EFG Scandinavia, but all people involved in the whole transport chain. The prevention of damage to any person is the highest obligation to all contracted partners.

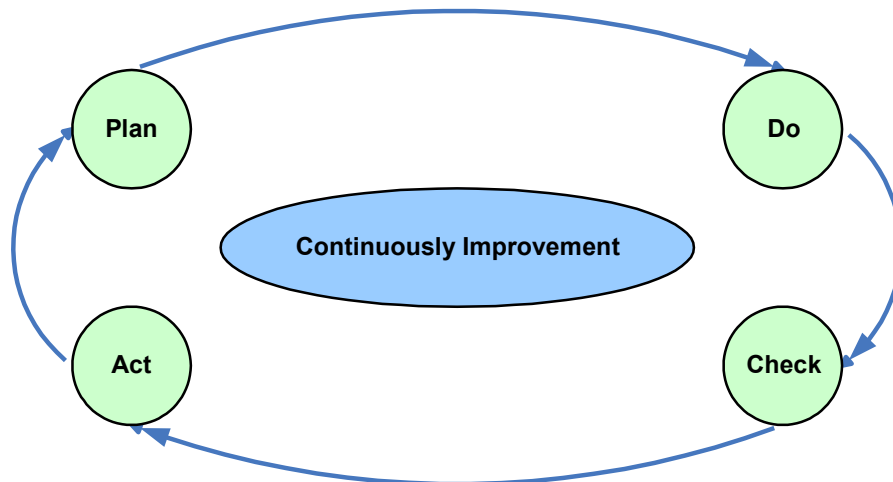
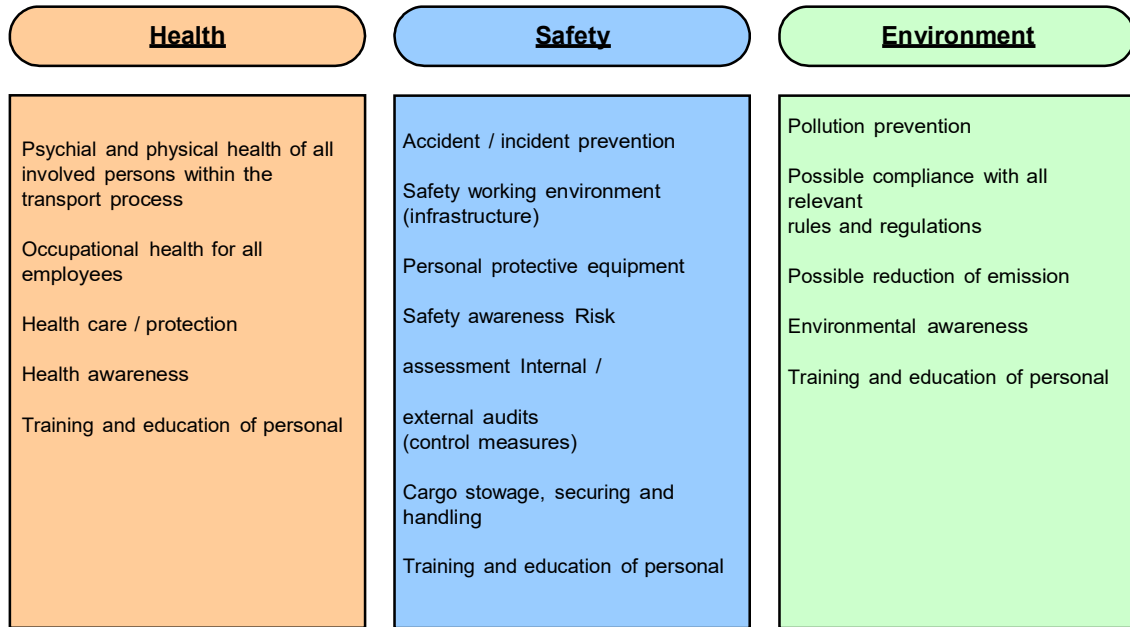
EFG Scandinavia will act in an ethical and socially responsible manner and within the laws, customs and traditions of the countries operating in. Our ambition is to avoid negative environmental impact, enhance positive effects and contribute to the sustainable development.

Daily behavior of each and everyone of the persons involved in the supply chain is crucial for creating a solid reputation for our overall progress. By consistently implementing and living the obligations set out above, we are laying, together with our contractual partners, the foundation for our successful future.

	<h1 style="color: blue;">HSE Plan</h1>	
--	--	--

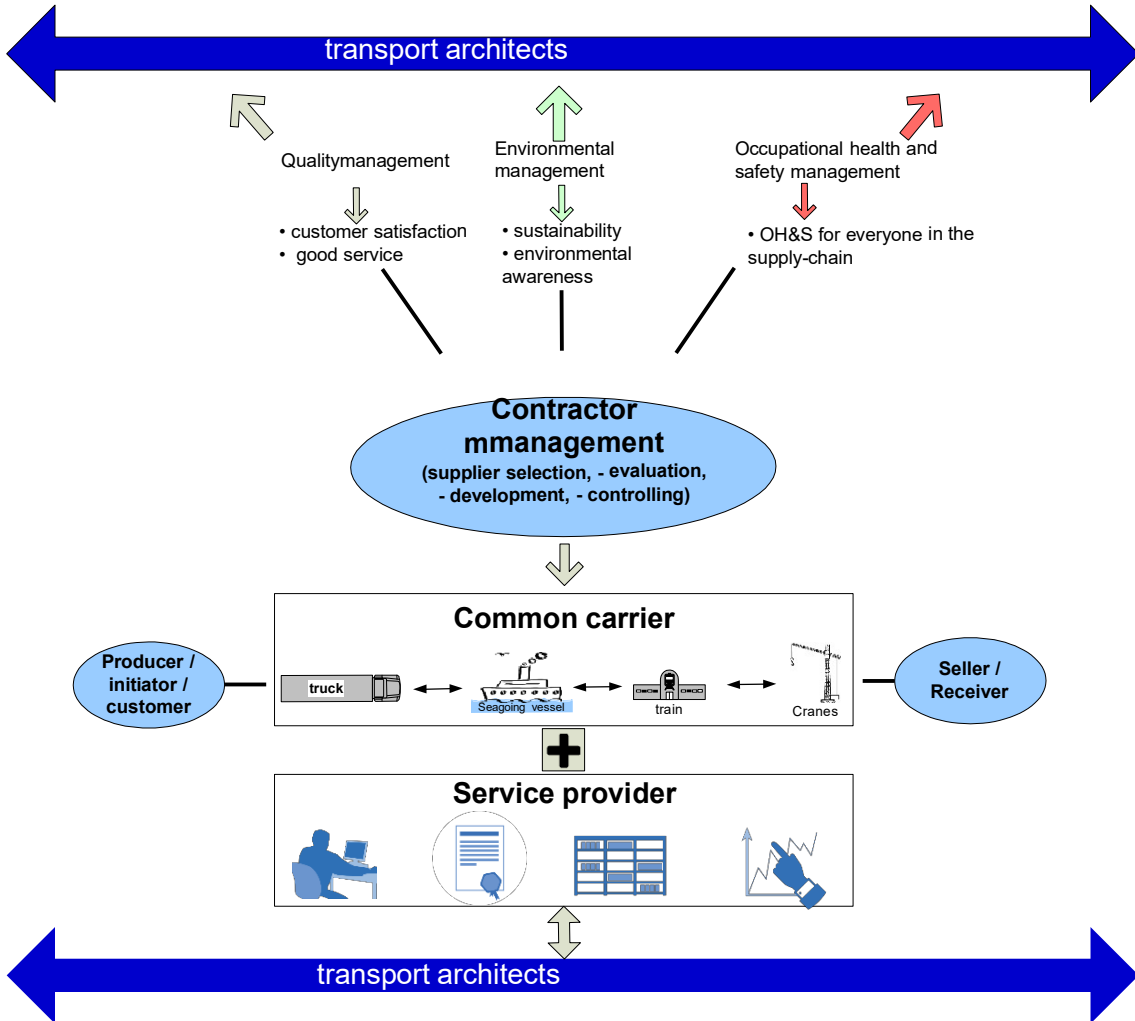
Revision Nr.: 1	Revision Date: xxx	Document : HSE Plan	Page 4 of 19
-----------------	--------------------	---------------------	--------------

2. HSE Objectives



	<h1>HSE Plan</h1>	
--	-------------------	--

3. contractor management:



HSE Plan

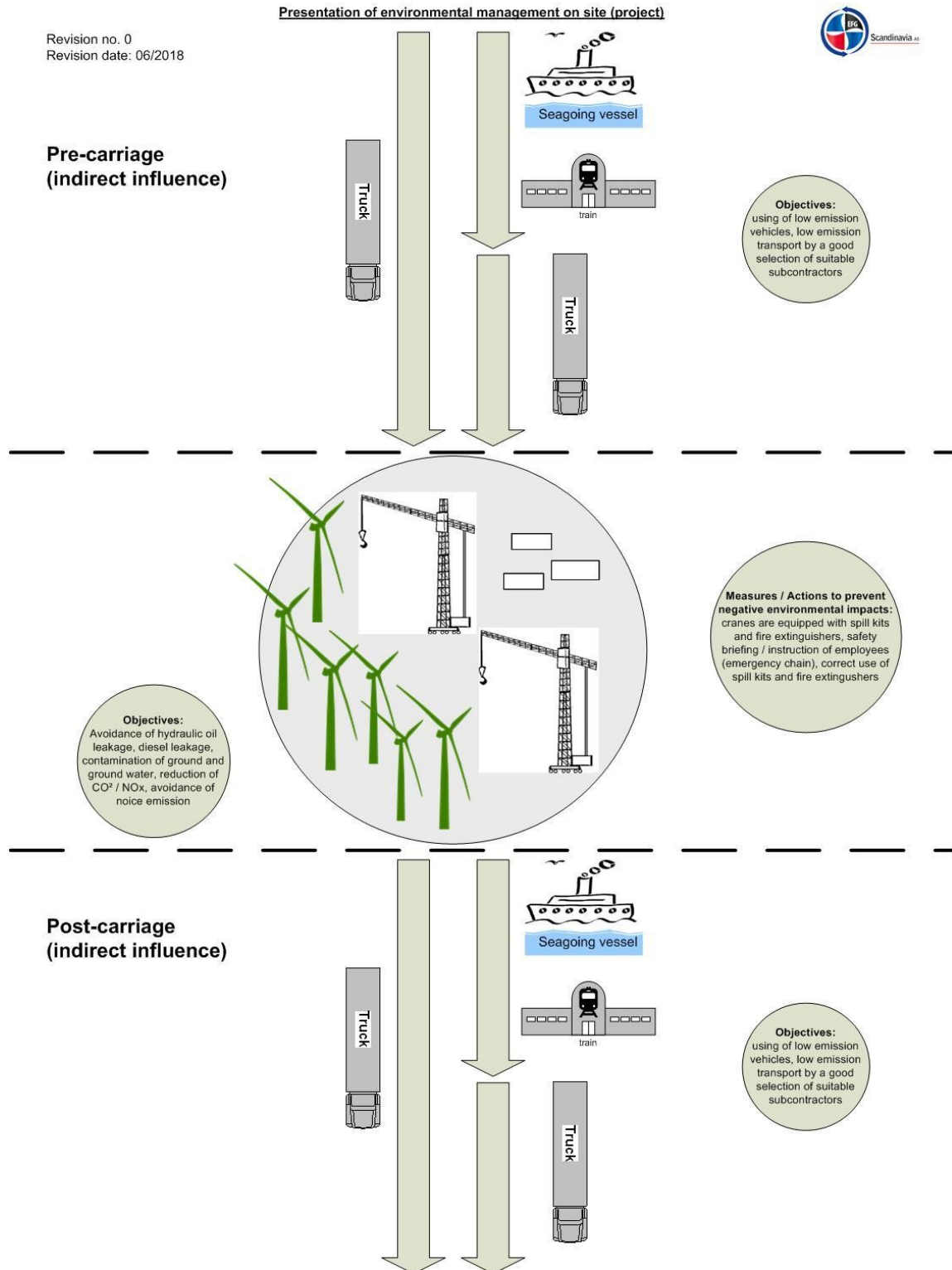
Revision Nr.: 1

Revision Date: xxx

Document : HSE Plan

Page 6 of 19

Overview of environmental management (on-site / projects):

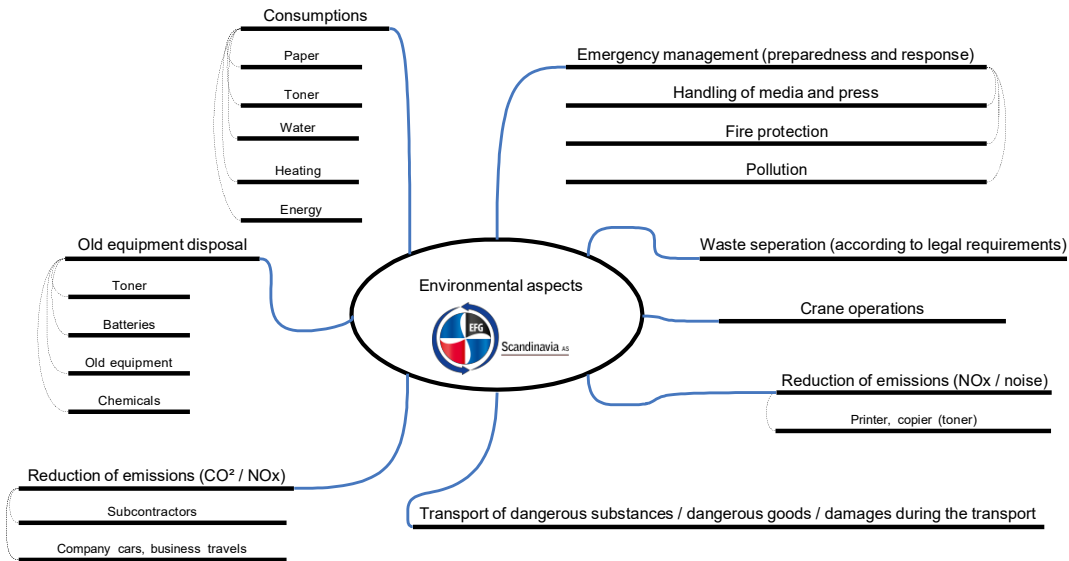


	<h1 style="color: blue;">HSE Plan</h1>	
--	--	--

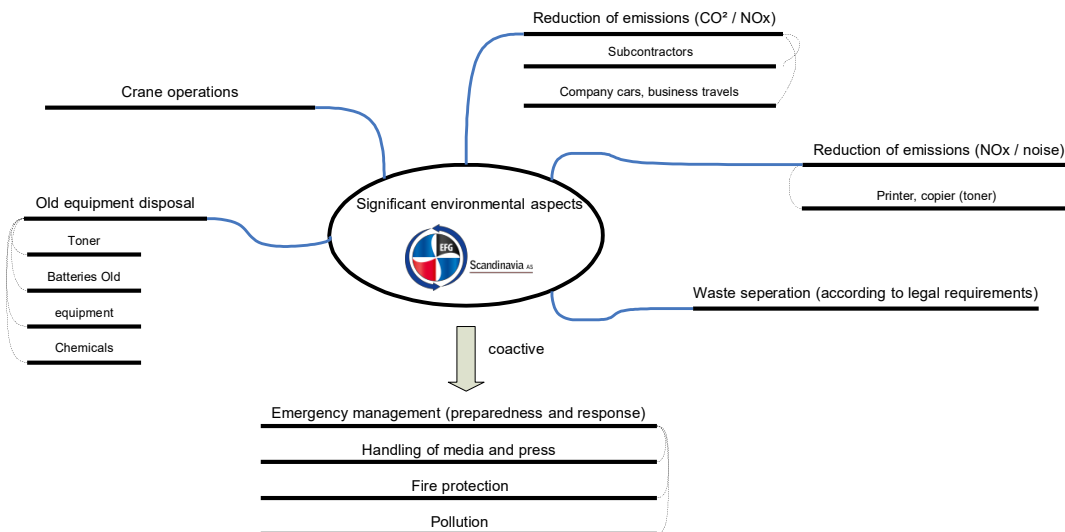
4. Environmental aspects

Our environmental objectives are essential to improve the sustainability and enhance the effect on the environment. Our environmental aspects differentiated into significant as well as direct/indirect environmental aspects and the resulting objectives are defined in our environmental program (“analysis of environmental aspects”). Our major goals are the continuous improvement of the environment within the complete supply chain and the decrease of our consumption rates.

Environmental aspects:



Significant environmental aspects:



	<h1>HSE Plan</h1>	
--	-------------------	--

Revision Nr.: 1	Revision Date: xxx	Document : HSE Plan	Page 8 of 19
-----------------	--------------------	---------------------	--------------

5. Measures

Together with the employees of EFG Scandinavia a company policy has been developed and principles defined, to steadily improve the provided service to our customers. The employees are familiar with these principles and incorporate same into their daily work. Additionally, to this EFG Scandinavia is certified according to EN ISO 9001:2015, EN ISO 14001:2015 and ISO 45001:2018 by Lloyd's Register Quality Assurance (LRQA) providing an independent proof and sign of high quality, environmental and occupational health and safety works in the company.

All works of EFG Scandinavia are carried out according the "PDCA"-Cycle (Plan – Do – Check – Act). With this the services and works carried out are permanently monitored and evaluated in respect to fulfillment of the customer's obligations, contractual agreements and possible improvements for future transportations. Required resources – regardless if personal, financial or infrastructural – are provided by the management to improve the processes of the company and its subcontractors.

A company policy is established within EFG Scandinavia, defining the principles for keeping responsible handling and compliance with occupational health and safety as well as environmental protection regulations. These principles are to be applied throughout the whole supply chain.

To find the most suitable and trusting subcontractor for the customer, we have developed a system of selecting the subcontractors based on different factors, e.g. present certifications, experience and also references. Furthermore, each project is monitored by the employees and any discrepancies are analyzed in respect to the root cause and the respective actions taken for correction. Additionally, preventive measures are taken into consideration and control measures are set in place.

The selection and evaluation of the subcontractors is permanently updated and every project is part of the general evaluation of all supporting and contracted companies. Additionally, the environmental support as well as safe handling of projects is mandatory for service providers carrying out services on our behalf.

As the main service of EMS-FEHN-Group is providing transport services in any ways, a group-based "risk assessment" has been developed. Depending on the means of transportation, this risk assessment has taken into account the most common risks and defined counteractions for preventing any injuries, damages and delays.

	<h1 style="color: blue;">HSE Plan</h1>	
--	--	--

6. Risk Assessment

One of our objectives is to assess all identified risks to our personnel, the environment and the equipment. On basis of our risk assessment we have to establish appropriate safeguards and procedures to minimize the risks and to recheck if appropriate measures / actions are defined to prevent the harm/risk/hazard:

- a **hazard** is anything that may cause harm, such as chemicals, electricity, working from ladders, an open drawer etc.
- the **risk** is the chance, high or low, that somebody could be harmed by these and other hazards, together with an indication of how serious the harm could be

5 steps to create a risk assessment:

- identifying what can harm (hazard/risk)
- identifying who might be harmed and how
- evaluating the risks and deciding on the appropriate controls, taking into account the controls you already have in place
- recording your risk assessment
- reviewing and updating your assessment

		Effect / Severity			
		insignificant <small>General: no effect on our service provision Occupational health and safety: slight injuries or illness, no permanent damage caused to health Environment: no environmental effect, no measures / actions necessary</small> 1	slight <small>General: restricted effect on our service provision Occupational health and safety: medium-heavy injuries or illness, no permanent damage caused to health Environment: insignificant effect, no permanent effect, moderate actions / measures necessary</small> 2	critical <small>General: serious effect on our service provision, definition of measures/ actions Occupational health and safety: heavy injuries or illness, slight permanent damage caused to health Environment: moderate, significant effect, definition of actions/measures</small> 3	kathastrophic <small>General: significant effect on our service provision, immediate actions/measures Occupational health and safety: heavy injuries or illness, heavy permanent damage caused to health, dead, disaster Environment: immediate actions/ measures, significant effect, permanent damages to environment</small> 4
Probability	very low (hardly imaginable; insignificant danger, preventable) 1	1	2	3	4
	low (imaginable; visibly and suppressible) 2	2	4 <hr style="width: 50%; margin: auto;"/>	6	8
	medium (possible; visible and terminable by continuous control) 3	3	6	9	12
	high (high danger, in case measures fail - damage unavoidable) 4	4	8	12	16

HSE Plan

Revision Nr.: 1

Revision Date: xxx

Document : HSE Plan

Page 10 of 19

Subject to the results the company' management takes the following steps: The measures are defined, using "E-STOP" method:

E = total elimination

S = substitution

T = technical measures

O = organizational measures

P = personal protection means.

Taking into account the services provided by us, complete elimination and/or replacement is not always possible. Usually measures are defined applying the "TOP" method.

Following steps will be commenced by the management addicted to the evaluation:

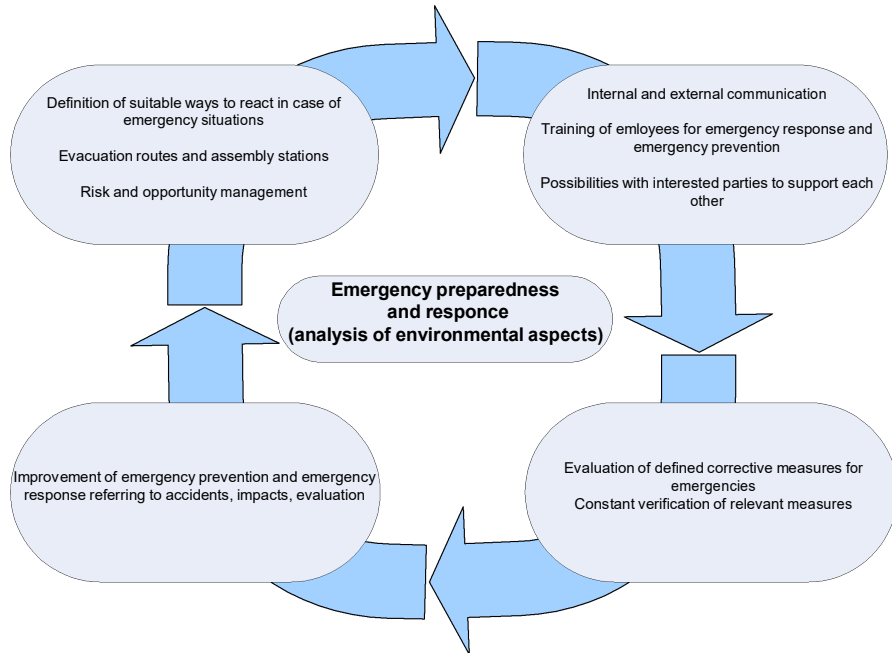
Risk evaluation	
1-2	No measures needed / no need for actions
3-4	Precaution is recommended / Appropriate measures if needed / observation of situation
6	Measures needed / additional need for actions (hazards) / checking feasibility – measures realizable? / in case of risk acceptance - measures are not necessary
8-16	Immediate actions necessary / immediate stop of operation (if necessary)

7. Emergency Scenarios

The specific emergency scenarios as well as the relevant measures / actions to react on same are recorded in the list of emergency scenarios as well as in the risk assessments. They are reviewed and, where necessary, updated, in particular after emergencies (including training in respect of the emergency situation) and at least once per year during the annual management review.

These emergency scenarios can cause the following consequences:

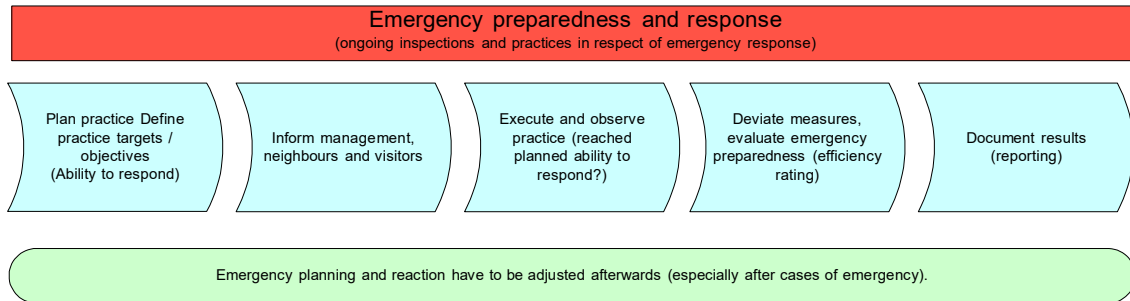
- Accidents, incident to workers (office and on-site)
- Pollution (caused by accident, water used for extinction)
- Negative image in the public press / media
- Lack of confidence in the legislator / authorities
- Consequences of the choice of subcontractors
- Loss of confidence (also among employees)



<h1>HSE Plan</h1>		
-------------------	--	--

Revision Nr.: 1	Revision Date: xxx	Document : HSE Plan	Page 12 of 19
-----------------	--------------------	---------------------	---------------

8. Emergency Preparedness and Response



We are a part of the supply chain and as a service provider we are the first point of contact for our interested parties, especially for our customers, in the event of accidents and / or emergencies. We may get notice of environmental and/or occupational health and safety incidents and emergencies that we directly or indirectly affect.

The relevant communication and information chain needs to be followed to respond to an emergency as quickly and appropriately as possible. The same applies to the ability to take measures and prevent and / or mitigate negative effects, in particular a negative impact on the occupational health and safety and on the environment.





The employees are briefed prior to proceeding to the work on possible emergency situations to prevent it and respond (response measures) and about the emergency chain and relevant contact persons.

Appropriate resources for training, further education and emergency / response measures training as well as resources in case of accident and incident to expand knowledge, acquire new knowledge and have adequately trained personnel available in emergency situations are granted.

The specific emergency scenarios as well as the relevant measures / actions to react on same are recorded in the risk assessments. They are reviewed and, where necessary, updated regularly and in particular after emergencies (including training in respect of the emergency situation).

	<h1>HSE Plan</h1>	
--	-------------------	--

9. Commitment to the Code of Conduct

ETHIK- UND VERHALTENSKODEX – HAUPTINHALTE Diese Leitlinien sind verpflichtend für alle Mitarbeiter/innen der EMS-Fehn-Group!		CODE OF ETHICS AND CONDUCT – MAIN ITEMS The policy as well as the code of conduct are compulsory for all employees of the EMS-Fehn-Group!	
			
Respektiere jedes Individuum gleichermaßen Respect each individual equally	Vermeldung von Interessenkonflikten Avoidance of any conflicts of interest	Transparentes Vorgehen Transparency and Control	Unbestechlich und gegen Korruption Anti-bribery and anti-corruption

As all members of the EMS-Fehn-Group, EFG Scandinavia set out certain obligations to its employees and subcontractors regarding general behavior. These principles combined are to be seen as the “Code of Conduct”.

a. Antitrust

Competition can only develop freely when it is fair. EFG is committed to integrity and fairness when competing other in the market. Conduct that undermines competition is not tolerated. EFG will compete in an ethically justifiable manner within the framework of the antitrust and competition rules in the market.

Antitrust laws prohibit agreements or actions that might eliminate or discourage competition, bring about a monopoly, abuse a dominant market position, artificially maintain prices, or otherwise illegally hamper or distort commerce.

It is therefore explicitly prohibited, e.g. to make agreements dividing up markets, regions or customers, to make agreements not to compete, to discuss processes related to participation in tenders, or to exchange information about prices, market shares or other market conditions with competitors, customers and business partners in violation of the applicable law.

	HSE Plan	
--	-----------------	--

Revision Nr.: 1	Revision Date: xxx	Document : HSE Plan	Page 14 of 19
-----------------	--------------------	---------------------	---------------

b. Corruption

Corruptions undermine economic development and free competition. It ruins reputations and exposes both companies and individuals to risk EFG is against all forms of corruption does not occur in any parts of the company's business activities.

The prohibition of corruption applies both to EFG Scandinavia as a company and to all persons acting on our behalf. In case of violations, it might lead to serious consequences both for the individuals involved as well as for EFG Scandinavia.

Gifts however – of material or immaterial value and nature – may be offered or accepted if the value is negligible or reasonable for the provided circumstances. In doubt the superior or management is to be consulted prior acceptance or offering.

c. Racism

EFG does not tolerate any kind of racist behavior in any way against any people, regardless their nationality, religion, culture or others. Violating against this will lead to drastically steps taken by EFG against the indicted person(s) and / or company(s).

d. Anti-bribery and anti-corruption (Bribery Act 2010)

Our organization will follow all applicable (national and international) laws and regulations as well as the bribery act 2010 (or latest edition).

<h1>HSE Plan</h1>		
-------------------	--	--

Revision Nr.: 1	Revision Date: xxx	Document : HSE Plan	Page 15 of 19
-----------------	--------------------	---------------------	---------------

10. Contact Details

EMS-Fehn-Group Scandinavia AS

Kokstadflaten 35

5257 Kokstad

Norway

Tel.: +47 55 55 80 80

Email: info@efg-scandinavia.com

Person in Charge: Mr. Tom-Roar Solhaug (Managing Director)

Quality Management EMS-Fehn-Group

Hafenstr. 15

26789 Leer

Germany

Persons in Charge:

Mr. Jens Feuerhake (QHSE-Manager)

Mrs. Dana Heibült (QHSE department)

Office: +49 (0) 491 45 45 810

Mail: quality@ems-fehn-group.de

	<h1 style="color: blue;">HSE Plan</h1>	
--	--	--

Revision Nr.: 1	Revision Date: xxx	Document : HSE Plan	Page 16 of 19
-----------------	--------------------	---------------------	---------------

Annex 1: Copy of actual EN ISO 9001:2015, EN ISO 14001:2015 and EN ISO 45001:2018 certificate



Lloyd's Register

Current issue date: 15 December 2020
 Expiry date: 14 December 2023
 Certificate identity number: 10307529

Original accreditation:
 ISO 14001 - 30 October 2018
 ISO 45001 - 29 November 2019
 ISO 9001 - 15 December 2014

Certificate of Approval

This is to certify that the Management System of:

EFG Scandinavia AS

Kokstadflaten 35, 5257 Kokstad, Norway

has been approved by Lloyd's Register to the following standards:

ISO 14001:2015, ISO 45001:2018, ISO 9001:2015

Approval number(s): ISO 14001 – 0027064-002, ISO 45001 – 0079387-002, ISO 9001 – 0018560-002

This certificate forms part of the approval identified by approval number: 0027064/ 0079387/ 0018560

The scope of this approval is applicable to:
 ISO 14001:2015
 Provision of logistics and crane services.
 ISO 45001:2018
 Provision of logistics and crane services.
 ISO 9001:2015
 Provision of logistics and crane services.



Paul Graaf
 Area Operations Manager North Europe
 Issued by: Lloyd's Register Deutschland GmbH
 for and on behalf of: Lloyd's Register Quality Assurance Limited



001

Lloyd's Register Group Limited, its affiliates and subsidiaries, including Lloyd's Register Quality Assurance Limited (LRQA), and their respective officers, employees or agents are, individually and collectively, referred to in this clause as 'Lloyd's Register'. Lloyd's Register assumes no responsibility and shall not be liable to any person for any loss, damage or expense caused by reliance on the information or advice in this document or howsoever provided, unless that person has agreed a contract with the relevant Lloyd's Register entity for the provision of this information or advice and in that case any responsibility or liability is exclusively on the terms and conditions set out in that contract. Issued by: Lloyd's Register Deutschland GmbH, Adolf-Giemele-Allee 3, 50829 Köln, Germany for and on behalf of: Lloyd's Register Quality Assurance Limited, 1 Trinity Park, Bickenhill Lane, Birmingham B37 7ES, United Kingdom

Page 1 of 1

HSE Plan

Revision Nr.: 1


Revision Date: xxx

Document : HSE Plan

Page 17 of 19

Annex 2: Company Policy

Nordic Power Vikings Ahead!



COMPANY POLICY

EFG Scandinavia AS with headquarters in Bergen on the west coast of Norway, specialize in Transport- Crane and Installation (TCI) solutions. We undertake projects of any size in several industries- from wind and renewable energy to construction and oil& gas.

Our company policy (comprising quality, environment and occupational health and safety (OH&S) management) aims providing long-term safe and health friendly working environment, long-standing customer and suppliers relationship and satisfaction, ongoing improvement and development, optimal dealing with the natural resources, as well as growth of the Company.

Many years of experience, dedicated, duly trained and skilled employees, safe and health friendly working environment, examined and proven suppliers, conscious handling of the natural resources and internal and external parties defined within the context are the basis for business achievements and the related optimal provision of services to our customers.

Furthermore, the following principles have been established to be successful on the market and withstand the competition:

- > **Consultation and Participation**

The processes and measures defined for the development, planning, identification and achievement of objectives, identification and assessment of a threat, for the implementation and evaluation of the performance, as well as the required improvement measures (especially relative to the occupational health and safety protection at the workplace) impose the obligation on us to consult with and involve the employees (their representatives, where appropriate) at all levels of our Company.

- > **Compliance with Legal Regulations and Other Requirements**

We obligate ourselves to comply with all applicable legal obligations (laws and regulations) and other requirements to the best of our knowledge and belief.

- > **Creation of Safe and Healthy Work Environment and conformance with OH&S standards**

We commit ourselves to comply with health and safety standards to prevent and minimize work-related injuries, accidents and/or illnesses. Our target is to minimize the defined risks and to increase the opportunities in respect of occupational health and safety in connection with the context and objectives of our organization.

In addition, we supply our employees with appropriate personal protective equipment (PPE) free of charge.

- > **Environmental Protection**

We undertake to comply with the compliance obligations on the basis of our services provided, as well as our defined context. Objectives are the protection of the environment, reduce the environmental load and affect it, to strengthen or form the awareness of our staff (including employees/workers), to use wisely the resources, to facilitate the sustainability and continuously review and improve the environment protection measures, as well as our environmental aspects.

- > **Development, maintain and preservation of Knowledge**

Selective training and education of our employees by internal and external means shall ensure to stabilize existing acquaintance gain new knowledge and to preserve the knowledge in the company.

Page 1 of 2



HSE Plan



Revision Nr.: 1	Revision Date: xxx	Document : HSE Plan	Page 18 of 19
-----------------	--------------------	---------------------	---------------



➤ Provision of necessary Resources

The management is responsible for assessing and providing necessary resources for fulfilling our services and compliance with occupational health and safety aspects as well as our environmental aspects.

➤ Avoidance of Mistakes / The Use of Lessons Learned from Mistakes

To avoid mistakes is fundamentally more important than to eliminate mistakes. Mistakes admitted in the past working operation are the essential experience and help us to optimize our working operations in the future as well as the occupational health and safety and the environmental awareness.

➤ Risk and Opportunity Management

The Company' management (with the employees involved) continuously defines, identifies, makes analysis and values the risks and opportunities, as well as the resulting minimization or elimination of risks and the measures to enhance our opportunities.

➤ Continuous improvement

Our sequence of operations, processes, methods as also the integrated management system is under permanent assessment and is optimized continuously in order to minimize the risks of business disruption, dangerous and hazardous occurrences and accidents within the service process.

The above mentioned principals (guidelines) provide the frame of our company's operational and strategic objectives defined, realized and assessed by management in order to provide a customer-oriented and high quality service provision under consideration of our defined occupational health and safety as well as environmental aspects.

The Company' management is responsible for the introduction, implementation, maintenance, further development (ongoing improvement) and the efficiency of the integrated management system (IMS) and is furthermore taking accountability for the system.

Every employee is bound to comply with these objectives. Quality-, environmental- and occupational health and safety management shall be seen as challenge for all employees of our company. Customer oriented services of highest quality is to be delivered permanently by unresent commitment of each and every one under consideration of our occupational health and safety requirements and environmental aspects. In cooperation with all departments the management is constantly evaluating the effectiveness and implementation of our company's policy.

This company policy is made known and available to all employees without limit, and where necessary. The policy can be provided to relevant interested parties accordingly.

The determined company policy is taking effect from the day of management's signature and is valid for the complete organization.

Date: 26/10-20

Tom-Roar Solhaug
Managing Director





EMS-Fehn-Group Scandinavia AS
Kokstadflaten 35
5257 Kokstad
Norway