	QUALITY POLICY		Issue Status	Rev 3
			Issue Date	07 th Feb 2022
			Issued by	HSEQA
	Document No.	PS-QHSE-POL-001	Authorised By	Director

QUALITY POLICY

POSH Subsea mission is to provide quality service levels that meet or exceed expectations.

POSH Subsea as a provider of subsea construction, Inspection, Repair and Maintenance (IRM) specializing in Engineering, Project management, Diving and ROV services committed to conducting our business activities in a manner where safety and quality is always of highest priority.

POSH Subsea is totally committed to achieving the highest management standards in order to satisfy customer requirements and takes into account risk-based thinking in planning, review and improvement of QHSE Management System.

There is a constant drive to satisfy requirements, whilst always being mindful of responsibilities to principals, shareholders, employees, and the community.

This involves the active participation, endeavour and ideas of all employees with the aim of continually improving the effectiveness of the QHSE Management System.

These high standards are achieved by operating a management system that meets or exceeds the requirements of the International Quality Management Standard (ISO 9001) and IMCA standards.

As part of its efforts to ensure continual improvement in the quality of services provided, POSH Subsea establishes, implements, monitors and achieves measurable quality improvement objectives. Such objectives are reviewed by Management and updated accordingly to ensure continual improvement.


Compliance with this policy, procedures and standard operations procedure is mandatory and binding upon all employees and quality of service is the responsibility of everyone working for and on behalf of POSH Subsea Pte Ltd.

The satisfaction of our principals and the good reputation of the POSH Subsea are directly dependent on this working philosophy.

Signed:  

Kurush Phiroze Contractor
Director, POSH Subsea Pte Ltd

Date: 07th February 2022

	HEALTH, SAFETY AND ENVIRONMENTAL POLICY		Issue Status	Rev 3
			Issue Date	07 th Feb 2022
			Issued by	HSEQA
	Document No.	PS-QHSE-POL-002	Director	Director

HEALTH, SAFETY AND ENVIRONMENTAL POLICY

POSH Subsea Management recognises the necessity and responsibility, not only to provide competent personnel and well-maintained vessels, but also to promote amongst people working for or on behalf of the company a high standard of safety, health and hygiene and environmental awareness and commitment. It is the POSH Subsea Management's belief that such awareness and commitment which includes pro-active attitudes towards HSE issues, must start and transcend from the most senior management level downwards through the whole spectrum of the organisation, including shipboard and shore based personnel.

In formulating the HSE Policy, the POSH Subsea Management has identified clearly the objectives and commitment that are required.

The main objectives of the HSE Policy are appended below which are applicable to all people working for or on behalf of the company.

- To promote safety, hygiene and health and environmental awareness and culture
- To provide a safe, healthy and environmentally friendly working environment
- To provide a commitment to consultation and provide opportunity to employees for participation.
- To prevent diving related injury, ill health and related losses and aim for zero Lost Time Incidents (LTI's)
- To prevent loss of, or damage to property
- To identify vessel, personnel, and environmental hazards and mitigate risks and committed to protect environment.
- To provide proper training and supervision for offshore team member
- To identify, assess and committed to eliminate hazards including health hazards and mitigate risks.
- To develop and implement QHSE Management system procedures
- To continuously maintain, review and committed improve upon the QHSE performance
- To achieve "Zero Accident, Incidents and Near Miss" on our vessels/sites.
- To ensure and committed to compliance with applicable codes, guidelines and standards recommended by the ISO (ISO 14001& ISO 45001), IMCA, local Legislation, and Classification Societies.


The Company Management has therefore endorsed a complete and comprehensive QHSE Management System Manual (QHSE MS) that clearly identifies in detail the procedures and measures required to achieve these objectives. The QHSE MS Manual also stresses the importance of giving a high priority and compliance to clients own rules, regulations and standards.

This QHSE MS Manual will be kept under constant review for continual improvements and revised accordingly in line with new/changed regulations, Company initiatives and to meet or exceed Client expectations.

Signed:  

Kurush Phiroze Contractor
Director, POSH Subsea Pte Ltd

Date: 07th February 2022

	DRUG AND ALCOHOL POLICY		Issue Status	Rev 3
			Issue Date	07 th Feb 2022
			Issued by	HSEQA
	Document No.	PS-QHSE-POL-003	Director	Director

DRUG AND ALCOHOL POLICY

POSH Subsea Drug and Alcohol Policy applies to all personnel who may work ashore, offshore, sail on, or visit the Company's chartered/own vessels.

POSH Subsea recognises that alcohol, illicit, prescription and other drugs, and controlled substances can cause impairment and affect an individual's performance, safety and productivity. POSH Subsea is committed to a workplace that is free from impairment induced by any substance, which includes but is not limited to drugs and alcohol.


The Company has Zero Tolerance Policy towards the use of Drug and Alcohol (Zero Blood Alcohol Content & Zero Drug Content)

To achieve this, the Company commits to:-

- Comply with all applicable statutory legislation, regulations, standards and any other requirements to which the Company subscribes.
- Prohibiting the consumption, soliciting or possession of illicit substances, and the consumption or soliciting of alcohol in the workplace.
- Prohibiting any personnel, whether shore-based or seagoing, from bringing alcohol or illicit drugs on board Company chartered/own vessels.
- Ensuring compliance with this policy which may include but is not limited to drug and alcohol testing of seagoing and/or shore-based staff during pre-employment, periodical medical assessments, post-incident testing, for cause, random testing.
- Ensuring that all prescription medication that may impact on an individual's ability to perform required duties must be declared to the relevant Supervisor.
- Ensuring that it does not employ any persons who are users of or have a recent record of the use of illegal drugs or have abused the use of prescribed drugs.
- POSH Subsea reserves the right to initiate disciplinary action as necessary for any violation of this policy.

Signed:  
Kurush Phiroze Contractor
 Director, POSH Subsea Pte Ltd

Date: 07th February 2022

	SMOKING POLICY		Issue Status	Rev 3
			Issue Date	07 th Feb 2022
			Issued by	HSEQA
	Document No.	PS-QHSE-POL-004	Director	Director

SMOKING POLICY

POSH Subsea do not allow smoking in any public area, including any permanent and/or temporary offices, accommodations, hallways, storerooms or warehouse, mechanical or electrical spaces.

Smoking on board Company chartered/own vessels is permitted only in designated smoking areas (as designated by the Master), except under the circumstances as mentioned below. Employee should take it into consideration of non-smokers, ensure that there is no smoking outside of the designated smoking areas.


Smoking is NOT allowed during operations where there is a hazard of fire or explosion, such as:

- Receiving or transferring fuel, oil, or other volatile liquids.
- Handling any type of flammable materials.
- During emergency drills.
- When moored or mooring alongside docks, piers, rig platforms or other installations where smoking is prohibited.
- Any circumstance where there is a risk of fire.
- Where local Policies, Procedures or Working Practices prohibit smoking.
- When the vessel is within a 500 metre safety zone

The OCM/Master/Barge Superintend, is also responsible for implementing and upholding this policy, although all other Officers and Crew Members share in this responsibility.

Signed:  
Kurush Phiroze Contractor
 Director, POSH Subsea Pte Ltd

Date: 07th February 2022

	STOP WORK POLICY		Issue Status	Rev 3
			Issue Date	07 th Feb 2022
			Issued by	HSEQA
	Document No.	PS-QHSE-POL-005	Director	Director

“STOP WORK” POLICY

“STOP WORK” POLICY

Everyone has the Authority,
Responsibility and Duty to

STOP THE WORK

If there is any doubt about the safety
of the personnel, asset, environment,
and operation


Signed: _____



Kurush Phiroze Contractor
Director, POSH Subsea Pte Ltd

Date:

07th February 2022

	FITNESS TO WORK POLICY		Issue Status	Rev 3
			Issue Date	07 th Feb 2022
			Issued by	HSEQA
	Document No.	PS-QHSE-POL-006	Director	Director

FITNESS TO WORK POLICY

POSH Subsea is committed to, provide and promoting an environment where all individuals are fit to perform work competently and in a manner which does not compromise their safety and health or the safety and health of others. POSH Subsea will identify, assess and manage fitness for work risks, and maintain a fitness for work program which includes;

Pre-Employment Medical Assessment

POSH Subsea implements a pre-employment medical program to ensure that employees are fit to undertake the tasks required of them in their prospective role. POSH Subsea offshore diving personnel/crew shall undertake OGUK/Diving Medical or STCW or Customer required medical test.

Leadership Responsibilities;

- Facilitate implementation of this fitness for work policy and associated procedures through the induction program for all workers.
- Support workers returning to work on a return to work program, from illness or injury.
- Monitor fitness for work of workers and intervene as necessary.
- Facilitate assistance to employees who may be experiencing difficulties outside the work environment that is affecting their performance.
- Ensure employees who are deemed unfit for work are dealt with in a just and fair manner.

All Employees are required to;

- Take care to ensure personal safety and comply with requirements of this policy and the fitness for work program
- Inform their respective supervisor of any changes in their personal circumstance that may affect their fitness for work
- Ensure that they are in a fit state to carry out their duties without risk to themselves or others.
- Notify their supervisor of any potential impairment of their fitness for work, including possible effects from prescription or pharmaceutical medication that may impact on their safety or performance at work

Fitness for Work Information and Training


Personnel's/crew with valid Medical Test certificate confirming fitness for work, shall allowed to carry out their duty. Regular Fitness/Medical/Health related inhouse training will be carried out onboard company chartered/own vessels.

Signed: _____



Kurush Phiroze Contractor
 Director, POSH Subsea Pte Ltd

Date: 07th February 2022

	DIVING EQUIPMENT MAINTENANCE AND SERVICE POLICY		Issue Status	Rev 3
			Issue Date	10 th September 2021
			Issued by	HSEQA
	Document No.	PS-QHSE-POL-007	Director	Director

DIVING EQUIPMENT MAINTENANCE AND SERVICE POLICY

In order to ensure the highest level of operability of plant and equipment, POSH Subsea Pte Ltd, has adopted a number of internationally recognised standards and guidelines in order to ensure complete and full compliance under the POSH quality management system.

This statement confirms that all maintenance, servicing, auditing, upgrades, certification, and documentation are carried out inline and periodically checked against the following documents:

- IMCA D 018: Initial and Periodic Examination, Testing and Certification of Diving Plant and Equipment.
- IMCA D 023: Diving Equipment System Inspection Guidance Note (DESIGN) for Surface Orientated (Air) Diving Systems.
- IMCA D 024: DESIGN for saturation (bell) diving systems.
- IMCA D 037: DESIGN for Surface Supplied Mixed Gas Diving Systems.
- IMCA D 040: Diving Equipment System Inspection Guidance Note (DESIGN) for Mobile/ Portable Surface Supplied Systems.
- IMCA D 053: DESIGN for the hyperbaric reception facility (HRF) forming part of a hyperbaric evacuation system (HES).
- Provision and Use of Work Equipment Regulations 1998 (PUWER).
- Diving at Work Regulations 1997.
- L103 Approved Code of Practice Commercial Diving Projects Offshore.
- OGP 411 Diving Recommended Practice 2008.
- HSG253 Safe Isolation of Plant & Equipment.
- ISO 9001 Quality Management Systems.
- Individual OEM documentation and manuals.

In order to ensure that all maintenance technicians and associated staff are qualified and deemed competent to carry out maintenance tasks, they are assessed in accordance with:

- IMCA C 003 Guidance on Competence Assurance and Assessment Diving Division.

This ensures that during project preparation and diving operations all area specific requirements are met with respect to diving plant, equipment, and maintenance tasks.

Signed: _____

Kurush Phiroze Contractor
Director, POSH Subsea Pte Ltd

Date: 10th Sep 2021