



Health, Safety, Security, Environmental and Social (HSSE&S) Communications Procedure

AZSPU-HSSE-DOC-00018-2

Authorities:	AzSPU HSE & Technical Vice President AzSPU C&EA Vice President	Custodians:	AzSPU Safety & Compliance Systems Manager AzSPU C&EA Communications Manager
Scope:	AzSPU Operational PUs	Document Administrator:	AzSPU HSSE MS Document Co- ordinator
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1.0 Purpose/Scope

The purpose of this procedure is to describe the communications processes established to:

- Ensure that BP AzSPU employees and contractors are aware of:
 - AzSPU health, safety, security, environmental and social (HSSE&S) policies and procedures relevant to their area of work. Legal and Other requirements relevant to their area of work.
 - Individual responsibilities within the AzSPU Integrated HSSE&S MS.
- Respond to external requests related to HSSE&S aspects of AzSPU operations.
- Provide guidance in sustaining interaction with regulatory agencies regarding compliance with HSSE requirements.

It is the intent of BP to communicate factual information about company operations openly and accurately to a broad variety of external interested parties.

This procedure applies to all AzSPU Operational Performance Units (PUs) engaged in the exploration, drilling, production and/or transportation of oil and gas.

This procedure is a high level document that provides guidance to operational sites (Assets/Facilities) in the implementation of their site specific procedures in order to ensure consistency, where applicable, across BP operations.

Revision of this controlled procedure will be in accordance with Document Management Procedure ([AzSPU-HSSE-DOC-00025-2](#)).

2.0 Definitions

Refer to document [AzSPU-HSSE-DOC-00021-2](#) HSSE Definitions for definitions common to this HSSE&S Management System (HSSE&S MS). Definitions specific to this procedure are included below.

OpenTalk – A system that allows users (both internal and external) to anonymously report concerns relating to health, safety, security, environmental, or social issues. Contact details are as follows:

24-hour phone lines:

- Azerbaijan + (994 12) 4979 888 (automatically diverts calls to International Collect)
- Georgia + (1 704) 540 2242
- International Collect + (1 704) 540 2242

Fax: + (1 704) 556 0732

Email: opentalk@myalertline.com

Letter: OpenTalk, 13950 Ballantyne Corporate Place, PMB 3767, Charlotte, NC 28277, USA

Intranet: <http://baku.bpweb.bp.com/dep/ethics/opentalk/compliance.asp>

3.0 Specific Requirements

Only requirements specific to this procedure are listed here. For requirements applicable to all procedures refer to the AzSPU HSSE&S General Requirements procedure ([AZSPU-HSSE-DOC-00037-2](#)).

- ISO 14001, 2004 - 4.4.3. Communication
- OHSAS 18001, 1999 - 4.4.3 Communication and Consultation
- BP Global HSSE Compliance Framework – Step 3 Operational Control (3.1, 3.5, 3.11).
- GHSER - Element 1 Leadership & Accountability (1.2, 1.8), Element 10 Community and Stakeholder Awareness (10.1-10.5), Element 13 Awareness, Assurance and Improvement (13.9).

4.0 Key Responsibilities

AzSPU Communications and External Affairs (C&EA) - Responsible for receiving, documenting and responding to external inquiries and reporting periodic statements (e.g. externally verified annual country Sustainability Reports) in co-ordination with AzSPU HSE&TD, as appropriate. This is carried out from offices in Baku and Tbilisi with the full co-operation of senior business and function managers. Also responsible for developing and maintaining contacts with the government, media, general public, and other third party stakeholders.

AzSPU Health, Safety, Environment and Technical Directorate (HSE&TD) - Responsible for receiving, documenting and responding to external inquiries and reporting periodic HSSE&S statements (e.g. externally verified HSSE Site Reports), in co-ordination with AzSPU C&EA Department, as appropriate. Within Azerbaijan AzSPU HSE&TD is responsible for primary interaction with external regulatory agencies – the AzSPU Environment Team is responsible for communication with the Ministry of Ecology and Natural Resources, while Permitting and Regulatory Affairs is responsible for communication with all other state regulatory bodies. In Georgia the Government Affairs Team is responsible for regulatory communications.

PU/Asset HSSE&S Organisations – Responsible for communication with local communities at project locations through dedicated Community Liaison Officers. Alternatively, AzSPU C&EA can manage communication with local communities and municipalities on behalf of the PUs/Assets. Sangachal PU C&EA is responsible for overall management and coordination of community relations with regard to communities affected by, and in the vicinity of, Sangachal Terminal. Export Pipelines Social Team is responsible for primary interaction with local communities (including landowners and land users) and executive authorities (e.g. municipality, executive committee members and district heads, etc) along the export pipeline rights of way.

Line Organisation – Accountable for ensuring appropriate communications are provided to employees relating to HSSE&S policies, legal and other requirements and procedures, and individual HSSE&S responsibilities.

BP Group – communicates information on significant BP-wide environmental / social issues and performance in its annual BP Group Sustainability Report, which is available on the Internet.

Presenters – Represent BP at external meetings, conferences and make presentations and/or publish material on BP's HSSE&S aspects, policies, standards, expectations, etc. Any member of staff making an external presentation should consult with their line manager or C&EA, prior to presenting, to ensure compliance with BP's internal system of control.

Contract Accountable Manager (CAM) – Primary point of contact between BP and suppliers/contractors. Responsible for ensuring that suppliers/contractors understand their responsibilities and deliverables and that performance reviews are carried out.

HSSE Representative – Responsible for ensuring that suppliers/contractors understand and meet BP's HSSE standards and expectations.

Incident Commander - Accountable for the overall management of incident response operations and for serving as the Incident Management Team's (IMT's) primary contact person with all involved or interested external parties.

Incident Liaison Officer – Responsible for communicating with the Ministry of Emergency Situations in an emergency situation.

5.0 Communications Process

BP has a clear policy of open public communication with regard to non-commercially confidential elements of its activities. This includes the dissemination of prompt, accurate and detailed information on its HSSE&S performance – particularly where that performance is likely to be of major public interest.

The BP Group communicates information on significant HSSE&S issues and HSSE&S performance in its annual BP Group Sustainability Report, which is available on the Internet. Local HSSE&S issues, as identified in environmental and social impact assessments (ESIAs), and other source documents, and are communicated to stakeholders by AzSPU and PU personnel through various reports including annual country Sustainability Reports.

All publications intended for wider audiences are reviewed by AzSPU C&EA prior to release.

Key audience groups include, but are not limited to:

Internal:

- Management (ALT, PULT, PUMT, ELT)
- Staff (local, regional, international)
- Segment
- Group
- Region

External:

- Government – Presidential apparatus, Ministers, key department heads
- State Oil Company of the Azerbaijan Republic (SOCAR)
- Georgian International Oil Corporation (GIOC)
- Environmental Sub-Committee
- Research and Monitoring Group (R&MG)
- Media (local, regional and international newspapers, magazines, radio and TV organizations and news agencies)
- Non Governmental Organizations (NGOs) with regional interests, and specifically those with an environmental or social agenda
- BP's business partners
- Contractors / suppliers
- Academic community
- The “community” – particularly people living close to our operations
- Representatives from key diplomatic missions
- Project related groups, e.g. Azerbaijan Social Review Commission (ASRC)
- Caspian Environment Program (CEP)
- Ministry of Ecology and Natural Resources (MENR) in Azerbaijan
- Ministry of Environment (MoE) in Georgia
- Ministry of Emergency Situations (MES) in Azerbaijan
- Lenders
- ExCom (Government executive branch on regional level) and municipality representatives
- Representatives from key diplomatic missions

5.1 Internal Communications

5.1.1 Communication of HSSE&S Policies, Procedures, and Requirements to Employees

Each PU and/or Asset, in co-ordination with AzSPU, establishes a written annual internal communication program by the end of the preceding calendar year or every 12 months, in order to communicate, at a minimum, the following information to affected employees:

- BP Group Policy and “Getting HSSE Right”
- AzSPU/PU/Asset's HSSE&S MS requirements (policies and procedures)
- PU/Asset's significant environmental and social aspects and impacts
- HSSE&S Objectives and Targets and Management Programs
- Findings and action plans related to independent internal compliance and MS audits as well as third-party compliance and EMS audits
- Environmental and social projects
- Compliance programme requirements – roles and responsibilities, budgeting, etc.

In addition, employees receive updates, as necessary, of:

- New or changed HSSE&S requirements that impact their individual roles and responsibilities
- Changes made to the HSSE&S MS or operating procedures, when relevant to employees's job function(s)
- Lessons learnt from HSSE events

- HSSE&S performance, performance contracts, and applicable HSSE scorecards
- Incidents, significant health / safety risks (e.g. pandemic planning, civil response).

Communication of these issues occurs via the most appropriate channels including:

- Formalized training sessions
- The HSSE&S MS web-site
- Intranet
- AzSPUL monthly newsletters
- Communication campaigns
- Toolbox meetings
- Staff meetings
- Posters, video, and e-mails
- Other written and oral communications
- Internal publications, such as brochures, leaflets, etc.

Staff are updated on activities and all elements of company performance through regular “townhalls” (large staff gatherings held approximately every three months), the intranet, the staff magazine “Compass”, display screens, notice boards, and through information circulated to staff groups as appropriate through e-mail.

HSSE&S information is also communicated, in part, through PU/Asset HSSE&S Teams.

Inquires from employees relating to HSSE&S requirement interpretations are forwarded to the appropriate HSSE&S staff member(s), HSSE&S Management Representative, or line manager for resolution.

New or changed standard operating procedures, as required by revisions to HSSE&S requirements, other requirements, or changes in operations, are communicated to affected employees. Revisions to requirements that are applicable to all PUs are communicated to PU/Asset HSSE representatives by AzSPU HSE&TD. The PU/Asset team is responsible for disseminating all requirements within their respective units.

Any concerns relating to HSSE&S issues can be reported using **Open Talk**. This is a global, independent service through which employees, contractors, and the external public can raise any concern about BP's operations and working practices, or seek guidance about compliance, ethics or the BP code of conduct, which they may feel otherwise unable to discuss with their manager or company representative. Contact details are provided in Section 2.

5.1.2 Communication of HSSE&S Compliance Accountabilities to Employees

Compliance accountabilities are communicated to employees through the AzSPU HSSE Compliance Training and Communication Strategy 2008-2009+ ([AzSPU-HSSE-DOC-00145-2](#)).

The following will be communicated to individuals with compliance accountabilities:

- Awareness of BP's compliance expectations.

- Information on compliance tools and resources (Compliance Task Manager, Compliance Requirement Position Papers, etc).
- Information on how to obtain guidance.
- Information on legally required communications (through AzSPU External Environmental Reporting Procedure, AzSPU HSSE External Reporting Compliance Requirements Position Paper, etc).

As part of this strategy compliance training is also provided, see AzSPU HSSE&S Training, Awareness and Competence Procedure ([AzSPU-HSSE-DOC-00030-2](#)).

In line with above, the Azerbaijan Leadership Team will promote commitment to HSSE compliance through tracking compliance KPIs, promoting the benefits of compliance (e.g. improved HSSE performance, cost savings, reduced liability, etc), positive recognition of compliance achievements and appropriate discipline where performance does not meet compliance expectations.

5.1.3 Communication of BP HSSE&S Policies, Procedures, and Requirements to Suppliers / Contractors

BP HSSE policies, procedures, requirements, and expectations for suppliers/contractors are communicated through pre-qualification, form of tender and contract documents. The requirements and expectations consist of the following key elements:

- Compliance with applicable HSSE legal requirements.
- Reporting of any violations of any HSSE laws or any of BP's current HSSE requirements.
- Compliance with BP policies and HSSE performance expectations and performance reporting against HSSE targets and progress against any corrective actions.
- Preparation of a HSSE Plan for the management of all HSSE aspects of the services.

For contracts with significant environmental aspects, CAMs will meet at least every 12 months with the individual contractor management to discuss the results of contractor HSSE performance self-assessments, and contractor internal compliance and HSSE MS audits (when they are performed). Contractors are also informed of the results of BP internal compliance and HSSE MS audit findings and action items that are relevant to their work.

For larger / more critical suppliers / contractors, performance reviews are held with the supplier / contractor and the BP Sector Team (CAM, Procurement Supply Chain Management Representative, Sector Team Lead, HSSE Representative, Technical Representative, etc) on a quarterly basis.

Any contractor employee concerns related to HSSE&S issues can be reported using **Open Talk** as outlined in Section 2.

5.2 External Communications

5.2.1 HSSE Policy

The Company's HSSE Policy is available to the public, and is actively communicated during external discussions by AzSPU C&EA. Uncontrolled copies of the Policy and a summary of the Company objectives are sent to interested parties.

5.2.2 Media

The media's information needs are serviced by a communications function within AzSPU C&EA which provides a fast response to questions on all aspects of BP operations from local and international journalists. Regular press conferences hosted by senior management (during operations phase these events will be held twice a year) and smaller briefings on specialized topics are conducted with journalists and appropriate experts from the businesses or functions. Information on the company's activities are communicated through regular press releases and though statements on specific topics, supported by Question and Answer documents used by C&EA and selected senior managers to provide consistent, up-to-date information in a timely fashion.

BP contributes regularly and openly to TV news and feature programs, with the company's Country President frequently appearing personally to outline major company developments. BP produces a bi-monthly program summarizing recent activities for screening on national television. Where appropriate, the company advertises in newspaper/periodicals, or on radio/TV. In addition BP runs a program of media visits to BP facilities.

AzSPU HSE&TD provides HSSE&S technical expert support and input material, and leads detailed media discussions, as required.

5.2.3 Non-Governmental Organizations

BP has developed close working relationships with NGOs, largely through partnership arrangements on a variety of social and environmental investment projects. As part of a broader stakeholder community, NGOs are regularly kept informed about BP activities and consulted with during new projects through regular dialogue sessions, workshops and public meetings. With regard to the consultation required under the environmental and social assurance process, AzSPU C&EA co-ordinates interactions with the NGOs, with participation and technical support from AzSPU HSE&TD.

5.2.4 Local Community

AzSPU HSE&TD and C&EA jointly develop annual HSSE&S awareness programs, which include activities such as the dissemination of newsletters and brochures, and awareness presentations to local communities through the Export Pipelines Social Team and Sangachal C&EA Team. C&EA also manages Environmental Investment Projects (EIPs) and Community Investment Projects (CIPs) with technical support, as necessary, from AzSPU HSE&TD.

At project locations AzSPU C&EA manages and oversees communication with local communities and authorities on behalf of, and in consultation with, PU/Asset social and C&EA teams. Day-to-day community liaison and communication is undertaken by Community Liaison Officers (managed by and reporting to the Exports Social Team and Sangachal C&EA Team) and through Public Information Centres (PICs). PICs are located at Sangachal, Umid, Sahil, Yevlak, Tovuz and Kurdamir within Azerbaijan, and in Borjomi in Georgia.

5.2.5 Handling External Inquiries from the Public, Non-Government Organisations and Non-Regulatory Agencies

Requests for information on HSSE&S issues from the public, NGOs and non-regulatory agencies are referred to the AzSPU C&EA and/or AzSPU HSE&TD. In general, those requests related to policy or HSSE&S performance issues are handled by C&EA, while those of a technical or regulatory nature are handled by HSE&TD.

For requests outside normal day-to-day operations support activities and established grievance procedures, C&EA and/or HSE&TD co-ordinates the appropriate response. The directors of these departments are responsible for identifying who, in their respective departments, need to be involved in the decision-making process to handle such inquiries. C&EA and/or HSE&TD also identifies an individual responsible for handling a particular request who prepares a written record to document the request and how it was handled. This written record contains the following information as a minimum:

- The name of the requester of information and how request was made (phone, letter, etc)
- Organisational affiliation (if applicable)
- Requester phone number and address (optional)
- Time and date of request
- The nature of request
- The response to the request
- The date of the response
- Person's name who provided the response

Records of external inquiry are maintained according to the AzSPU HSSE&S MS Record Control Procedure ([AzSPU-HSSE-DOC-00041-2](#)).

Inquiries made of BP employees (presenters) related to their external presentations or their published material related to BP HSSE&S are handled by the presenter, unless it is outside the scope of the presentation or publication, in which case it is handled as a non-regulatory agency request.

5.2.6 Interaction with HSSE Regulatory Bodies and Government

In the course of conducting business, senior company representatives meet regularly with representatives from Government, Azerbaijan Ministry of Fuel and Energy, the state oil companies (SOCAR and GIOC), and representatives from diplomatic missions. The company uses these meetings to ensure that key external contacts are kept informed of key developments and aspects of the company's HSSE&S performance.

AzSPU HSE&TD and PU HSSE teams communicate regularly with HSSE regulatory agencies (MENR, MES, MoE, etc) and undertake the legally required consultation with authorities as part of the environmental permitting process. Meetings with HSSE regulators are also used to advocate AzSPU's position on key and emerging regulatory issues. The process is documented in order to help AzSPU develop an overall understanding of the external compliance environment and involves input from the AzSPU HSSE&S Management System and Compliance Team.

AzSPU HSE&TD, supported by the PUs, also communicates with Partners and SOCAR/GIOC on HSSE&S issues. Regular meetings and communications are also held with the Environmental Sub-Committee and the Research and Monitoring Group (R&MG), set up under Production Sharing Agreements in Azerbaijan.

Day-to-day communication with HSSE regulatory agencies and HSSE external reporting in Azerbaijan are handled by AzSPU HSE&TD.

Requirements for AzSPU external environmental regulatory reporting will be detailed in the HSSE Compliance Task Manager (CTM) system as Compliance Tasks - along with frequency, responsibility / accountability for completion, and operational controls. In collaboration with this the 'AzSPU External Environmental Reporting Procedure, Azerbaijan – Preparation and Submission of Statutory Environmental Reports' ([AzSPU-HSSE-DOC-00143-2](#)) will provide clarity on internal reporting processes and roles and responsibilities.

In addition, a summary of HSSE national and international legislative and project-specific external reporting requirements are outlined in the document 'AzSPU HSSE External Reporting Compliance Requirements Position Paper' (available on request from the HSSE&S Management System and Compliance Team). The purpose of this document is to identify applicable legal compliance requirements and standards for different subject areas; formulate realistic and defensible compliance standards; describe how compliance should be demonstrated; outline regulatory monitoring to be conducted and identify advocacy activities.

Requirements for Government Agency inspections of BP's facilities in Azerbaijan are outlined in the AzSPU Procedure for MENR Inspections / Monitoring at BP Facilities ([AzSPU-HSSE-DOC-00010-2](#)).

5.2.7 Annual External Communication Programme

AzSPU (HSE&TD) and each PU and/or Asset establish and implement an Annual External Communication Program (AECP) in order to communicate key HSSE&S aspects and impacts to external stakeholders, e.g. Governmental Agencies, Ministries, NGOs, local community, scientists and others.

Specifically, the AECP will cover:

- Provision of information about the operational activities and its potential impacts to project affected communities and other stakeholders;
- Provision of opportunities to BP Operations affected communities and other stakeholders to voice their opinions and concerns; and

- Provision of opportunities for BP Operations feedback and discussion with those communities concerning measures proposed.

5.2.8 AzSPU HSSE Site Report

The AzSPU HSSE MS & Compliance Team will issue an externally verified statement (HSSE Site Report) relating to HSSE performance and programs of all ISO 14001 certified sites on an annual basis (unless information is incorporated into annual country Sustainability Reports).

5.2.9 Emergency Response

Communication forms a key element of BP's emergency response planning, with AzSPU C&EA assuming responsibility for relaying information quickly to the majority of aforementioned internal and external audiences.

C&EA fulfils the role of Public Information Officer within the Incident Management Team (IMT). However, if there is a significant incident a Media Response Team is established by the IMT.

In an emergency response situation, the IMT Incident Commander is accountable for communicating with the Ministry of Emergency Situations, while the Incident Liaison Officer is responsible for this activity.

Guidance for conducting BP internal and external agency material release reporting at AzSPU sites is included in the AzSPU Internal and External Material Release Reporting and Notification Procedure ([AzSPU-HSSE-DOC-00075-2](#)).

5.2.10 Complaints

Queries and complaints from the national Government (with the exception of those relating to specific regulatory requirements) and regional or international stakeholders are routed through AzSPU C&EA. C&EA will work with the appropriate business/function manager and will seek to respond to those queries or complaints of an urgent nature within 24 hours. PU/Asset specific queries and complaints (e.g. from local communities) are addressed by designated PU/Asset representatives as detailed in the PU/Asset level procedures.

6.0 Key Documents/Tools/References

- AzSPU HSSE&S MS Records Control Procedure ([AzSPU-HSSE-DOC-00041-2](#)).
- AzSPU Procedure for MENR Inspections / Monitoring at BP Facilities in Azerbaijan ([AzSPU-HSSE-DOC-00010-2](#)).
- AzSPU Internal and External Material Release Reporting and Notification Procedure ([AzSPU-HSSE-DOC-00075-2](#)).

- AzSPU External Environmental Reporting Procedure, Azerbaijan – Preparation and Submission of Statutory Environmental Reports ([AzSPU-HSSE-DOC-00143-2](#)).
- AzSPU HSSE External Reporting Compliance Requirements Position Paper (available on request from the HSSE&S Management System and Compliance Team).
- AzSPU HSSE Compliance Training and Communication Strategy 2008-2009+ ([AzSPU-HSSE-DOC-00145-2](#)).
- AzSPU HSSE&S Training, Awareness and Competence Procedure ([AzSPU-HSSE-DOC-00030-2](#)).

Revision/Review Log

Revision Date	Authority	Custodian	Revision Details
July 2000	G. Vidrine F. Askerov	G. Stacey	Initial Issue
August 2000	G. Vidrine R. Gallagher	G. Stacey	Consistency with BP EMS guidelines
April 2004	L. Emmons	S. Sultanova	Consistency with EMS requirements
November 28, 2005	Gunther Newcombe	Yuliy Zaytsev	Updated version to include HSSE Compliance Management Framework and AzSPU Integrated HSSE&S MS requirements
February 1, 2007	Gunther Newcombe	Yuliy Zaytsev	<p>Version updated to include results of discussions with C&EA Communications Manager and CHSSE Environment Manager.</p> <p>Section 2, 5.1.1 and 5.1.2 updated to include reference to Open Talk.</p> <p>Section 5.1.2 reviewed based on updated PSCM documentation and Supplier Performance Management Common Process documentation.</p> <p>Sections 5.2.3 and 5.2.4 clarification regarding roles of CHSSE and C&EA provided.</p> <p>Section 5.2.9 clarification provided regarding responsibilities in Emergency Response situation.</p> <p>References to other related procedures included.</p>

June 24, 2008	Greg Mattson (AzSPU HSE & Technical Vice President)	Yuliy Zaytsev (AzSPU HSSE MS & Compliance Manager)	<p>Clarification provided regarding responsibilities for communication with regulatory bodies in Azerbaijan and Georgia. Clarification provided regarding the roles of AzSPU C&EA, Sangachal Terminal C&EA, and Export Pipelines Social Team.</p> <p>Procedure updated to include requirements of the BP Global HSSE Compliance Framework.</p> <p>‘Section 5.1.2 – Communication of HSSE&S Compliance Accountabilities to Employees’ added to procedure. Outlines the compliance training and communication requirements of the BP Global HSSE Compliance Framework and makes reference to the AzSPU HSSE Compliance Training and Communication Strategy 2008-2009+ (AzSPU-HSSE-DOC-00145-2).</p> <p>Section 5.2.6 updated to include advocacy meetings with HSSE regulators.</p> <p>Reference to AzSPU External Reporting Procedure (AzSPU-HSSE-DOC-00143-2) and the AzSPU HSSE External Reporting Compliance Requirements Position Paper added.</p>
April 14, 2009	Greg Mattson (AzSPU HSE & Technical Vice President)	Yuliy Zaytsev (AzSPU Safety & Compliance Systems Manager)	Custodian position has changed to reflect org changes in HSE&TD as of December 1st 2008