AzSPU Compliance Task Verification Procedure

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1. Introduction

The HSE Compliance Task Manager (CTM) Tool provides a means of managing legal compliance requirements across AzSPU. CTM can be accessed at the following site: https://HSEcms.bpglobal.com. To log on to CTM users need to enter their BP NT ID and NT password. Users who log on to CTM can view and manage specific tasks they are responsible for.

This work instruction accompanies the AzSPU HSE Legal And Regulatory Requirements Procedure (Document AZSPU-HSE-DOC-00038-2) which describes the CTM Tool in further detail.

This procedure describes the process for verifying tasks to ensure that they are SMART i.e.:

- **Specific** – stand alone, clear and direct.
- **Measurable** – I can say it is done.
- **Actionable** – starts with an action orientated verb (i.e. collect, record, post, survey, inspect).
- **Reasonable** – no wish list, stick to tasks the site is already performing, whenever possible.
- **Timely** – set the right frequency, don't overdo it.

Compliance Tasks have been and will continue to be developed from the following Source Documents:

- Contractual agreements (e.g. PSA, HGA)
- Host Government Agreements (HGA)
- Project-specific documents (ESIAs, Technical Notes)
- Applicable legislation & regulations (National legislation & International Agreements ratified by Host Countries)

All capitalized terms used in this procedure are defined in the following section.

2. Definitions

Compliance Task (Task): A clearly defined action that is developed from the High Level Requirement/Rule. The Compliance Task is contained in the Task Description column in the Task Spreadsheet.

Compliance Task Manager (CTM): An electronic compliance matrix (database) enabling businesses to manage the relationship between applicable legal and other requirements, compliance tasks, accountable BP employee positions, and operational controls.

Consolidation: Combining similar tasks from multiple rows in the Task Spreadsheet into a single row. This requires copying and pasting of the task language and citation information into a single row in the Task Spreadsheet. The task language will normally need to be amended to reflect all of the requirements added.

Continual Task: A Task that has no due date assigned, e.g. to comply with the HSE policy.

High Level Requirement/Detailed Requirement: Title of the Source Document and specific reference (e.g. section heading).

Due Date: Specific date when a task is to be completed.

Entity: The Facility where the Compliance Task is conducted, e.g. Sangachal Terminal, Chirag-1 platform etc.

Evidence Document Description: Name of the document that provides evidence of Task completion, e.g. CWAA Waste Register.

Evidence Document Location: Location of the evidence record (physical or electronic filing location).

Frequency: The number of times a task occurs, e.g. One Time, Monthly etc.

High Level Requirement: A requirement contained in a Source Document. The requirement is contained in the "Requirement Citation Text 1" column in the Task Spreadsheet.

Operational Control: Procedure or site instruction that ensures the Task is completed correctly.

Operational Control Location: Location of the Operation Control (physical or electronic filing location e.g. dK Documentum).

Owner: The full name of the person responsible for implementing a Task.

Position Title: The employee's formal job title, e.g. WA Control Room Technician, Senior HSE Compliance Adviser, etc. Position Titles are included in the Position Title List in the Task Spreadsheet.

Quality Assurance (QA): The process of checking compliance with the requirements of this procedure.

Recurring Task: A Task that is repeated at a specific Frequency, e.g. monthly.

Requirement Citation Text: Actual language taken from the Source Document which the Compliance Task is developed from.

Roll Up: Combining duplicate tasks from multiple rows in the Task Spreadsheet into a single row. This requires copying and pasting the duplicated task information into a single row in the Task Spreadsheet. There is no need to amend the task language as the requirement(s) added are identical.

Source Document (Driver): Documents that are reviewed for the purposes of identifying requirements and developing tasks. These documents include, but are not necessarily limited to; PSAs, HGAs, ESIAs, technical notes and correspondence with the regulators.

State: The current state of the Task i.e. whether the Task is 'Open' (to be completed and/or recurring) or 'Closed' (completed and non-recurring).

Supervisor: The full name of the person accountable for implementing a task, normally the line manager (or more senior) of the task Owner.

Supervisor Team: The Position Title of the person accountable for completion of the Task, normally the line manager of the Task Owner, e.g. DWG Platform Wells TL. Note that this must be a BP position.

Task: See Compliance Task.

Task ID: A unique reference number for identifying tasks.

Task Activation: Uploading a Task to CTM and assigning its State as Open.

Task Owner: See Owner.

Task Spreadsheet: The excel spreadsheet containing tasks and related information (the template to be used is AzSPU-HSE-DOC-00094-A2).

Task Statement: Statement summarizing the Compliance Task requirement.

Task Verification: The process described in this procedure.

Task Verifier: The designated Operating Area /Asset Compliance Advisor (who may be supported by a HSE Compliance Adviser).

Team: The Position Title of the person responsible for implementing the task, e.g. DWG Staff Geophysicist.

3. Purpose

The purpose of this document is to describe:

- The actions to be undertaken by Operating Area /Asset HSE personnel in the Task Verification process.
- The actions to be undertaken by AzSPU HSE Compliance Team personnel in conducting Quality Assurance.

4. Roles & Responsibilities

4.1 Offshore & DC&I HSE Compliance Adviser; Exports Compliance Lead; ST Compliance Adviser:

- SPA for respectful asset related task verification and quality assurance process and drive the SPU Compliance agenda by:
  - Owning the process of verification of tasks in CTM system in cooperation with Operations H, S & E Advisers
  - Communication with SMEs, Regular connectivity meetings with HSE Compliance team, offshore site/assets personnel and Offshore environmental advisors;
  - submit verified & QA tasks to HSE Compliance Team for further processing within the agreed timeline
  - conduct task closure quality assurance reviews with objective to ensure the requirements are followed and activities are compliant
  - Promoting compliance culture in asset operations by arranging CTM training and compliance awareness sessions for a facility staff; ensure task owners / task supervisors are aware of CTM User training pack / to keep the list of participants updated arranging and conducting CTM user training to target people
  - Tracking and reporting of progress of compliance tasks and issues on regular basis

Quality Assurance of verified tasks:

1. Check that the format of the data entered is correct.
2. Check that the minimum required data has been included.
3. Provide email notification to the Operating Area/Asset Task Verifier listing tasks that are ready for activation in CTM. Tasks will be activated in CTM as soon as practicable after email notification, as agreed with the Operating Area/Asset Task Verifier.

4.2 Operating Area/Asset Level

Asset/Ops Area H&S & Environmental Advisers from the Operating Area/Asset HSE function (whether Environmental, H&S), in coordination with Offshore & DC&I HSE Compliance Adviser; Exports Compliance Lead; ST Compliance Adviser: are responsible for verifying **of respectful (H, S& E)** tasks in the Task Spreadsheet in accordance with Sections 5 & 6 of this procedure, including:

- Assigned tasks are understood by Task Owners or their line managers.
- Operating Area /Asset Advisers undertake Task Verification in accordance with the requirements of this procedure.
- Reviewing and sense checking the applicability of assigned tasks and revising the applicability as required.
- Facilitating the Task Owner or their line manager to review task language and amend as required.
- Verifying that assigned tasks are understood by the Task Owner or their line manager.
- Completing the Position Title List in the Task Spreadsheet.
- Checking that all information entered in the Task Spreadsheet is formatted in accordance with this procedure.

4.3 HSE Compliance Team

HSE Compliance TL (or delegate)

Accountable for ensuring that:

- Compliance Advisers comply with the requirements of this procedure.
- Effective explanation and support is provided to Operating Area /Asset Advisers in a timely manner.
- Verification processes are simplified where possible and focused on higher risk areas.

Compliance Adviser

Responsible for:

- Help coordinating Task Verification for their respective Operating Areas (i.e. Offshore, Terminal and Midstream).
- Checking that information in the Task Spreadsheet is formatted in accordance with this procedure.
- Providing explanation and support to Operating Area/Asset designated compliance adviser in a timely manner.
- Final Quality Assurance of Tasks prior to upload into CTM.
- Advance notification (on Task Activation) to all personnel who are responsible & accountable for implementation of compliance tasks
- Coordinating the delivery of training for CTM users.

5. Key Operating Area requirements:

1. Tasks are issued in the Task Spreadsheet, the format of which must not be changed. The content of the file should only be changed in accordance with this procedure.

2. The column headings for the Task Spreadsheet you will be using are provided in Appendix 1 - please read and understand Appendix 1 before working on the Task Spreadsheet. Only those column headers shaded green must be completed, if applicable.

3. Do not make any changes to the columns titled "DO NOT AMEND".

4. If you have any questions please do not hesitate to contact your respective Compliance Adviser in the HSE Compliance Team.

5. Every task must be verified with the Task Owner(s). Where the Task Verifier has reviewed the task with the responsible party's line manager, unless otherwise agreed, the line manager has responsibility for checking the Task Owner's awareness and understanding of their assigned tasks. The Task Verifier must ensure that the line manager is aware of this responsibility.

6. Please include your comments only in the "Comments (Operating Area /Asset)" column.

7. Do not delete any rows in the spreadsheet. If you identify duplicate tasks please indicate this in the "Comments (Operating Area /Asset)" column by referencing the Task ID, e.g. "DELETE: DUPLICATES TASK ID 678".

6. Procedure for Operating Area /Asset Verification

The Operating Area Environmental Adviser should verify tasks contained in the Task Spreadsheet using the following ten steps:

Step 1 - Confirm Entity Assignment

Locate the Entity column and confirm that all Compliance Tasks are located at the correct Entity (e.g. Sangachal Terminal). If the Entity is not correct put the correct Entity in the adjacent "Entity (new)" column. Do not amend the Entity column.

Step 2 - Confirm Task Description

Read and understand the Task Description together with the Requirement Citation Text. Confirm that the Task Description adequately addresses the Requirement Citation Text, i.e. it demonstrates how the requirement will be met. If the Task Description does not adequately address the Requirement Text or is not SMART, put the new task description in the "Task Description (new)" column. Do not amend the "Task Description" column.

Before completing the draft Task Description you need to check that the task has not been duplicated. You also need to consider whether it can be consolidated with other tasks - See "**Optional Steps**" below.

Step 3 - Confirm Task Title

Confirm that the Task Title is an appropriate summary of the Task Description. If you have changed the Task Description you may wish to amend the Task Title to reflect the changes you have made. Add the new task title into the "Task Title (new)" column. Do not amend the "Task Title" column.

Step 4 - Identify or Confirm Team / Supervisor Team

Assign the Team and Supervisor Team for each valid task. If the Team and Supervisor Team are already assigned confirm that they are correct. You must ensure that the correct Position Title is given for both the Team and the Supervisor.

Step 5 - Complete the Position Title List

Select the Position Title List tab in the Task Spreadsheet and add Position Titles as needed checking that:

- Each name behind a Position Title has a BP NT ID (login name) and BP e-mail address assigned. Note: If a BP email is not available it either needs to be created (via IT Help Desk) or the task should be re-assigned to a BP employee.

- All Position Titles have a full list of all names currently holding the position, e.g. for rotator positions such as OIM, two full names would normally be required.

- Position Titles included in the Position Title List match the titles included in the Task Spreadsheet.

Step 6 - Complete Due Date & Frequency

The Due Date is only required for recurring tasks and must be entered in US Date Format i.e. MM/DD/YYYY. Once you have entered the Due Date select the appropriate value from the drop down list in the "Frequency" column.

If a frequency has already been provided it is normally because this is a requirement from the Source document (e.g. an ESIA commitment to conduct annual stack emissions monitoring) or as a result of the procedural requirements within an Operation Control.

By leaving the Frequency cell blank the Task will automatically be assigned as Continual.

Step 7 - Assign Operational Controls

Assign Operational Controls (Description and Location). Provide specific document details (Full Title/Reference Number) and avoid general statements where possible.

Step 8 - Assign Task to BP or Contractor

Select either "BP" or "Contractor" from the drop down list.

Step 9 - Assign Task Group

Select the most appropriate value from the drop down list in the "Task Group-Other" column.

Step 10 - Assign Task State

This is the last step in Task Verification. Assign 'Close' in the Task State cell if a Compliance Task has been completed and will not recur, i.e. one-off design or construction related Compliance Tasks. A Compliance Task can only be closed once the full evidence record (document description & location) has been provided. Note: this action will not delete the Compliance Task from CTM, but will ensure that the Compliance Task is not listed in the current view of any user.

Optional Steps:

Marking Duplicate Tasks for Deletion

If you have two or more duplicate tasks in the Task Spreadsheet you should mark the duplicated task(s) for deletion by indicating in the "Comments (Operating Area /Asset)" column, in the appropriate row, that the task should be deleted e.g. "DELETE: DUPLICATES TASK ID 456". **Do not delete any rows.** When referencing the task that is duplicated use only the value in the ID column, **do not reference rows in the spreadsheet.**

Marking Tasks for Consolidation

If you have two or more similar tasks in the Task Spreadsheet that can be combined into a single task you should identify the task that is to be retained and indicate that it is to be retained in the "Comments (Operating Area /Asset)" column, e.g.

"RETAIN THIS TASK BUT CONSOLIDATE WITH TASK ID 954 (TO BE DELETED)"

Review the Task Description for the task to be retained and verify that it accurately reflects the requirements it has been consolidated with. If it does not, put the new task description in the "Task Description (new)" column.

Marking a Task to be Split

Only split tasks if strictly necessary - e.g. they are conducted by different people. Insert new rows immediately below the original task and copy and paste the task information into these rows. Amend the task language and other requirements as needed in accordance with the preceding steps. **Do not delete the original task**. Indicate in the "Comment (Operating Area /Asset)" column next to the original task that it is to be split, i.e. "TASK TO BE SPLIT"

Appendix 1- Column Headings in Task Spreadsheet

COLUMN HEADING	WARNING	REQUIREMENTS FOR DATA ENTRY
ID	DO NOT AMEND	
Colour Code Comments (Central)	DO NOT AMEND	
Comments (PU/Asset)		Provide comments as required, e.g. "THIS REQUIREMENT IS NOT APPLICABLE AS THE OFFSHORE PU DOES NOT CONDUCT AMBIENT AIR MONITORING."
Entity	DO NOT AMEND	
Entity (New)		If the assigned entity is wrong insert the correct entity here.
State	REQUIRED	The current state of the Compliance Task i.e. whether the Task is 'Open' (to be completed and/or recurring) or 'Closed' (completed and non-recurring)
High Level Requirement 1	DO NOT AMEND	
Detailed Requirement 1	DO NOT AMEND	
Requirement Citation Text 1	DO NOT AMEND	
Task Title	DO NOT AMEND	
Task Title (New)		Maximum length of 100 characters
Task Description	DO NOT AMEND	
Task Description (New)		If the task needs rewording the new text must be included here
Due Date	REQUIRED (ONLY FOR RECURRING TASK)	Enter the date **only in US Date format** - MM/DD/YYYY
Frequency	REQUIRED (UNLESS A CONTINUOUS TASK)	Select a value from the drop down list
Owner	REQUIRED	Full name(s) as included in the Position Title List spreadsheet
Team	REQUIRED	Position Title as included in the Position Title List
Supervisor	REQUIRED	Full name as included in the Position Title List Spreadsheet
Supervisor Team	REQUIRED	Position Title as included in the Position Title List
Operational Control Description 1	REQUIRED	Name of control, e.g. document ID of the procedure
Operational Control Location 1	REQUIRED	Location of the procedure, e.g. "HSSE MS Documentum"
Task Group - BP/Contractor Performed	REQUIRED	Select a value from the drop down list
Task Group Other 1	REQUIRED	Select a value from the drop down list
Operational Control Description 2	AVOID USING IF POSSIBLE	Include only if necessary - it is recommended to avoid multiple controls where possible
Operational Control Location 2		
Operational Control Description 3		
Operational Control Location 3		
Evidence Document Description 1		Include only if required. Evidence of completion, e.g. "Site Inspection Checklist August 2009"
Evidence Document Location 1		Include only if required. Location of completion evidence, e.g. "HSSE_MS_Shared_Drive\Monitoring Reports"
Evidence Document Description 2	AVOID USING IF POSSIBLE	
Evidence Document Location 2		
Evidence Document Description 3		
Evidence Document Location 3		
High Level Requirement 2	DO NOT AMEND	
Detailed Requirement 2		
Requirement Citation Text 2		
High Level Requirement 3		
Detailed Requirement 3		
Requirement Citation Text 3		
High Level Requirement 4		
Detailed Requirement 4		
Requirement Citation Text 4		
High Level Requirement 5		
Detailed Requirement 5		
Requirement Citation Text 5		

Note: Column headings colored bright green (heavy shading) must be completed if applicable.

Revision/Review Log

Revision Date	Authority	Custodian	Revision Details
08 January 2007	Y.Zaytsev	M.Neale	Initial Issue
29 March 2007	Y.Zaytsev	M.Neale	1st Review
30 April 2007	Y.Zaytsev	M.Neale	2nd Review
29 August 2007	Y.Zaytsev	J.Elliott	No changes
3 March, 2008	Y.Zaytsev	J.Elliott N. Amirmatova	Section 2, table is updated as per task verification lessons learnt
19 May 2009	Y. Zaytsev	N. Amirmatova	Added definitions, roles & responsibilities and revised procedure for Operating Area/Asset verification. Added new Appendix 1.
07 May 2010	A. Naghiyev	N. Amirmatova	Annual Review; Amended as per new Organizational MOC
06 August 2010	A. Naghiyev	N. Amirmatova	Annual Review; Amended as per new Organizational MOC