MANAGEMENT OF CHANGE PROCEDURE

ACTS-OMS-ROUT-00**-MOC-20120502-REV-0

DOCUMENT DETAILS

<table>
<thead>
<tr>
<th>Document Title</th>
<th>Management of Change Procedure</th>
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<tr>
<td>Document Description</td>
<td>HSE Rollout</td>
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<tr>
<td>Prepared By</td>
<td>Anti-Corrosion Technical Services Limited</td>
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<td>ACTS Ref</td>
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REVIEW DETAILS

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<th>ORIG</th>
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<td>02 MAY 12</td>
<td>N. SAMMY</td>
<td>K. HAYNES</td>
<td>A.C. HEWITT</td>
<td>R. SURAJBALLY</td>
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Management of Change
Roll Out Presentation
AGENDA

- To provide guidelines on ACTS Management of Change Procedure.
Why implement the change of management process

1. Establish a common approach for requesting change.
2. Evaluate if Risk identified in recommended change are acceptable.
3. Implement proper control/sign off for all change request.
4. Describe the required communications points for properly processing changes.
1. TECHNICAL— As illustrated in the MOC decision flow diagram

- It is used for formal request, evaluation, documentation and authorization of changes to the method of operational processes and major infrastructural amendments to facility which require technical assessment when change is made.
MOC DECISION TREE

TECHNICAL MOC (APPENDIX 1)

IMPLEMENT TECHNICAL MANAGEMENT

START

YES

Does anyone need to receive additional training as a result of this change?

NO

YES

Is this a change in the operating parameter of the equipment outside current operating?

NO

YES

Is this a change in the capacity of a piece of equipment outside operating/design limits?

NO

Does this change bring new technology into the facility?

NO

YES

Is a modification of operating or maintenance procedure required as a result of this change?

NO

Does this change affect facility or personnel other than those conducting the work?

NO

YES

Does this change conflict with the design codes in any way?

NO

YES

Is this a change to the process flow path?

NO

YES

Is there a change in material from the original design?

NO

YES

Does this change or alter Process Control System?

NO

CHANGE DOES NOT REQUIRE MOC.
2. ORGANIZATIONAL– As illustrated in the MOC decision flow diagram, it is used for formal request, evaluation, documentation and authorization of changes to personnel or the organizational hierarchy which directly impacts operations.
ORGANIZATIONAL MOC (APPENDIX 2)

START

Does anyone need to receive training as a result of this change?

NO

Does anyone need to receive training as a result of this change?

NO

Is this a change in the number of personnel in the facility?

NO

Is this a change in the number of hours worked?

NO

Is there a change in the delegation of authority where safety, health or environment is impacted?

NO

Is there a change in the organizational structure? (Addition or deletion of a job position)

NO

Is there a change from Company employees to Contract employees?

NO

Is there a change in the operating Philosophy?

NO

Is there a change in the number of personnel required for a specific task?

NO

CHANGE DOES NOT REQUIRE MOC.
3. ADMINISTRATIVE – As illustrated in the MOC decision flow diagram, formal request evaluation, documentation and authorization of changes to operating procedures.
Appendix 3 – Administrative MOC

START

1. IMPLEMENTATION OF THE NECESSARY CHANGE
   - YES: Training (formal or informal) to personnel due to change
   - NO: Change in existing codes and/or standards

2. Change in existing codes and/or standards
   - NO: Change in existing policy and/or law

3. Change in existing policy and/or law
   - NO: Change in procedures

4. Change in procedures
   - NO: Change in controlled documentation

5. Change in controlled documentation
   - NO: Change in work processes

6. Change in work processes
   - NO: Change in job description

7. Change in job description
   - NO: Change in organizational chart

8. Change in organizational chart
   - NO: NO CHANGE IS REQUIRED
4. EMERGENCY– Under emergency conditions it may not be possible to complete all the steps required in the MOC process. In this situation the person on site with the appropriate level of authority may AUTHORIZE appropriate actions and shall be held ACCOUNTABLE for emergency variances and RESPONSIBLE for assuring that formal documentation of any emergency changes is completed in a timely manner in accordance to the MOC procedure. They are also responsible for communicating any variances to management.
The MOC procedure shall be implemented to any change/ modification that is introduced which affects the current process being utilized.
A MOC shall be used for modifications for any of the following processes in ACTS:

i. Delegation of authority
ii. Materials and Equipments.
iii. Procedures
iv. Standards and Specifications.
v. Engineering contracts and contractors.
vi. Equipment suppliers.
viii. Personnel, training and communication
Replacement in Kind
A MOC is not required where a “replacement in kind” is performed such as:

i. If the replacement item has the same technical specifications as the original.

ii. The replacement is a routine operation carried out by maintenance technicians with a consistent level of training and experience. The item is replaced as part of a preventive maintenance program.
The level of risk for the change in the process must be determined using ACTS Risk Assessment procedure.

This must be completed by the relevant departments prior to submission for evaluation.

A risk assessment rating is used to determine the risk of the potential hazards present as a result of the change whereby approvers and authorizers will be selected accordingly.

Submission of the risk assessment shall be documented and attached to the MOC form.
Changes in the process occurs under two conditions which are described below:

i. Process Improvement Changes (under regular conditions)

ii. Emergency Process Changes
In the course of the Company’s operation, the Employees assigned to particular responsibilities may find improved ways or methods to accomplish a particular task.
The following process is to be followed for making significant changes:

i. The Department Team for the relevant Department will discuss the proposed change, and will come up with a clear description of the change, and how the proposed procedure differs from the one currently being observed.

ii. The type of MOC is then selected which meets the criteria of the proposed change.
iii. The Department Leader then procures all relevant documentation to support the change. Once accepted by the Dept. Leader the MOC form along with all supporting documents are forwarded to the Technical Operations Manager.

iv. The Technical Operations Manager then reviews the proposed change and makes required amendments.

v. If the Operations Manager does not agree regarding the proposed changes, a report stating reasons for rejection is then generated and forwarded to the Departmental Leader concluding the change process.
vi. If the Operations Manager agrees, it is forwarded to the Director for approval.

vii. The Director approves or rejects the change request documenting reasons for the decision. Approved changes are scheduled for staging and production implementation. The MOC register is then updated and feedback is provided to the requestor.

viii. The approved request will be given to the Technical Operations Manager then submitted to the Department Leader to which the change was requested.
ix. The Department leader then requests the necessary resources from each departmental heads, which is required for the implementation of change.

x. After approval the Department Team then updates the relevant Management Systems’ Document, and issue a revision number in the format ‘REV X’ where ‘X’ is the latest number plus one.

xi. The change is communicated to relevant personnel internally using electronic mail and memorandums.

xii. Instructions for completing the MOC form and change control log are provided in the tables attached to the appendix.
In the course of the Company’s operation, there may be changes which must be implemented immediately. This can only be done for three reasons:

i. The process must be changed due to a deficiency which creates conditions which are extremely hazardous to the Employee’s or Company’s welfare.

ii. The process must be changed to prevent any damage to the environment or those directly affected by the environment.
iii. The process would cause a serious adverse effect to the deliverables for the Client. This procedure can only be used when the change is a time-sensitive issue. The following process is to be followed for making emergency changes:

- The Department Team will submit the ACTS Management of Change Form, with a priority rating of ‘Emergency’, and an explanation as to why it is an emergency.
- The review of the proposed change will be evaluated by the Operations Manager on site.
• If the Operations Manager agrees, then the change shall be authorized by the Director once all details surrounding the emergency are clearly communicated by the Operations Manager. If conditions are as such that the Director is not available to approve, the person on site with the appropriate level of authority can approve it.

• This person shall be accountable for emergency variances and responsible for assuring that formal documentation of an emergency variance is completed in a timely manner.
• The change will be implemented from the Management level, where any necessary resources shall be sourced to meet requirements.
• The procedure will be immediately implemented by the Employees trained to do so.
• After approval the employee will update the relevant Management Systems Document and issue a revision number in the format ‘REV X’ where ‘X’ is the latest number plus one.
PROCESS OVERVIEW

- Change request is documented and approved by the Departmental Team and Departmental Team Leader.
- Change request is forwarded to appropriate Manager(s).
- Manager(s) log change request and verify change completeness/accuracy.
- Manager(s) review the overall impact of the change request (time/resources etc).
- The Director(s) approves change request for implementation after evaluation and assessment by Qualified Teams.
- Change(s) are implemented on a scheduled basis as appropriate.
- Rejected changes are communicated as appropriate.
- Change status is updated/communicated at each step of the process.
Any Questions