

LSP Doc. No : LSP-1S01-0006

## Long Son Petrochemicals Co., Ltd.

HSSE Department	Rev. 3
Security Plan	Page: 1 of 47

### **SECURITY PLAN**

3	18/8/16	Updated to reflect the optimised Project design	MFC	See attachment of reviewer's signature	
2	22/04/15	Response LSP's Comments	ERM	See attachment of reviewer's signature	
1	16/02/15	Response LSP's Comments	ERM	See attachment of reviewer's signature	
0	23/01/2015	Issue For Review	ERM	See attachment of reviewer's signature	
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LSP Doc. No: LSP-1S01-0006

## Long Son Petrochemicals Co., Ltd.

HSSE Department	Rev. 3
Security Plan	Page: 2 of 47

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LSP Doc. No: LSP-1S01-0006

## Long Son Petrochemicals Co., Ltd.

HSSE Department	Rev. 3
Security Plan	Page: 3 of 47

#### **REVISION LOG**

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Rev.	(dd/mm/yyyy)	Item	Page	Article	Description
0	23/01/2015	all	all	all	Issue For Review
1	16/02/2015	all	all	all	Response LSP's Comments
2	22/04/2015	all	all	all	Response LSP's Comments
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HSSE Department	Rev. 3
Security Plan	Page: 4 of 47

Long Son Petrochemicals Co., Ltd

LSP Doc. No: LSP-1S01-0006

#### **CONTENTS**

ACRONYM.	S	6
1	INTRODUCTION	8
1.1	OVERVIEW	8
1.2	PURPOSE AND SCOPE	8
1.3	PROJECT OVERVIEW	9
1.4	APPLICABILITY	10
1.5	RELATIONSHIPS TO OTHER MANAGEMENT PLANS	10
1.6	APPLICABLE STANDARDS	11
2	ROLES AND RESPONSIBILITIES	12
2.1	INTRODUCTION	12
2.2	LSP CONSTRUCTION HSSE TEAM	12
2.3	EPC CONTRACTOR	12
2.4	DESCRIPTION ROLES AND RESPONSIBILITIES	14
2.5	PRIVATE SECURITY PROVIDER VETTING	16
2.6	CONTACT INFORMATION	16
3	SECURITY RISKS	17
3.1	SECURITY PROCEDURE	17
3.2	SECURITY CONTRACTORS REQUIREMENTS	17
4	REPORTING AND AUDITING	25
4.1	REPORTING	25
4.2	AUDITING	25
5	COMMUNICATION PROCEDURE	26
5.1	MEETINGS	26
5.2	URGENT COMMUNICATION	26
6	REPORTING INTERNAL VIOLATIONS, GRIEVANCES FROM THIRD PARTIES, AND	
	INVESTIGATIONS OF ALLEGED MISCONDUCT	27
6.1	GRIEVANCES FROM EXTERNAL PARTIES	27
6.2	INVESTIGATING ALLEDED MISCONDUCT	27



HSSE Department	Rev. 3
Security Plan	Page: 5 of 47

**Long Son Petrochemicals Co., Ltd** 

LSP Doc. No: LSP-1S01-0006

7	CONSTRUCTION SITE SECURITY: RESOURCES AND EQUIPMENT	28
7.1	SECURITY CONTROL ROOM	28
7.2	SECURITY FENCING	29
7.3	SITE ALARM SYSTEM	29
7.4	CAR PARKS	30
8	CONSTRUCTION SITE: PROJECT ACCESS AND CONTROL SYSTEM	31
8.1	PERSONNEL AND VEHICLE ACCESS	31
8.2	INDIVIDUAL DATA RECORD	31
9.1	SECURITY SEARCH	31
9.2	CONSTRUCTION SITE WORKERS DISCIPLINE	32
10.1	OFFICE ACCESS	34
10.2	OFFICE VISITOR LOG	34
11	PORT SECURITY	35
12	WORKERS ACCOMODATION CAMP SITE SECURITY	36
12.1	WORKERS ACCOMMODATION SECURITY PLAN	36
12.2	WORKERS ACCOMMODATION CAMP SECURITY REQUIREMENTS AND DUTIES	37
ANNEX A	- EMPLOYEE CONTACT DETAILS ASSOCIATED WITH SECURITY PLAN	41
ANNEX B	- VISITOR ENTRY PROCEDURE FOR CONSTRUCTION SITE AND SITE OFFICIES	43
ANNEX C	- MATERIALS EXIT PROCEDURE	46



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 6 of 47	

#### **ACRONYMS**

ASP Air Separation Plant BOC Balance of Complex

CGMP Community Grievance Management Plan

CTU Central Utility Plant

EPC Engineering, Procurement and Construction

HDPE High Density Polyethylene

HR Human Resources

HSSE Health, Safety, Security and Environmental

ID Identification

IFC International Finance Corporation
ISPS International Ship and Port Security
LLDPE Linear Low Density Polyethylene

LSP Long Son Petrochemicals
MEP Materials Exist Procedure

PP Polypropylene

PS Performance Standard

UN United Nations

VCM Vinyl Chloride Monomer



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.			
HSSE Department	Rev. 3		
Security Plan	Page: 7 of 47		

#### **DISCLAIMER**

It is upon the Contractor to solicit, acquire and comply with all information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder.

The Contractor hereby agrees and acknowledges that the Employer makes no representation or warranty, express or implied, regarding the accuracy or completeness of any or all information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder. THE EMPLOYER HEREBY EXPRESSLY DISCLAIMS ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ALL RESPECTS, and the Contractor agrees that neither the Employer nor any of its affiliate(s), director(s), officer(s), employee(s), consultant(s), professional advisor(s), and duly authorised representative(s) shall have any liability to the Contractor or any of its affiliate(s), director(s), officer(s), employee(s), consultant(s), professional advisor(s), and duly authorised representative(s) in any way relating to those information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder or the Contractor's or its affiliate(s)', director(s)', officer(s)', employee(s)', consultant(s)', professional advisor(s)', and duly authorised representative(s)' reliance thereupon and/or use thereof.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.	
HSSE Department	Rev. 3
Security Plan	Page: 8 of 47

#### 1 INTRODUCTION

#### 1.1 OVERVIEW

This document is the Security Plan for the Long Son Petrochemicals Company Limited (LSP) Petrochemical Complex in South of Vietnam Project (hereafter the "Project") on Long Son Island, Long Son Commune, Ba Ria Vung Tau Province, Vietnam.

This Security Plan is a detailed management plan, under the framework of the Environmental and Social Management System (ESMS) that will be used to guide the Project's environmental and social management.

#### 1.2 PURPOSE AND SCOPE

The purpose of this Security Plan is to outline the security measures required during the construction phase of the Project.

This Security Plan has been prepared to set out the actions required to ensure there is sufficient security during construction in order to protect, all LSP employees, Engineering, Procurement and Construction (EPC) Contractors, Subcontractors and visitors:

- the Project property;
- all plant, equipment and personal property at the Project site, in a manner consistent with Vietnamese laws and regulations, international good practice and human rights and respecting the human rights of the local communities.

This Security Management Plan applies to all LSP employees, EPC Contractors, Subcontractors and visitors engaged on any portion of work associated with the following:

- Construction Sites (Petrochemical Plant and Seaport); and
- Workers Accommodation Camps (EPC Contractors and Subcontractors).

The security of the Construction Sites includes security associated with the site offices, laydown areas, storage areas, warehouses, workshops and car parks.

The Security Plan will outline how security will be managed to do the following:

1. To ensure that the operating policies for Security are clearly articulated and are observed.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.	
HSSE Department	Rev. 3
Security Plan	Page: 9 of 47

- To provide assistance and guidelines with regard to the maintenance of general safety and the management of emergencies that may be encountered on the property.
- 3. To require that the security provider and persons retained on the site are free from any previous criminal convictions or serious allegations of human rights violations.
- 4. To require that the security provider is trained to a standard capable of carrying out security operations to a degree and in a manner that is compliant at all times with the guidance and commitment to IFC Performance Standard 4 Community Health, Safety, and Security.
- 5. To provide policies and procedures which require standards and norms of behavior from the retained security force and which include at its core a) the respect for human rights, b) appropriate escalation in the use of force when responding to an incident, c) accurate reporting of incidents and accidents that may impact the local community.
- 6. To provide a means for local communities to report grievances<sup>1</sup> arising from the security operations, as well as other activities at the site.
- 7. The Owner or EPC Contractors do not sanction any use of force, except when used for preventative and defensive purposes in proportion to the nature and extent of the threat. Security personnel are permitted to use force only as a matter of last resort in the case of an imminent threat to life, including their own, and in a manner that respects human rights.

#### 1.3 PROJECT OVERVIEW

The Long Son Petrochemicals Complex Project is located in Hamlet 2 and Rach Gia Hamlet, Long Son Commune, Vung Tau City, Ba Ria – Vung Tau Province, Vietnam. The Complex is spread over 464 ha, including area for its future expansion. The Project will be comprised of two main components:

- 1) The Petrochemical Plant, which consists of the following plants and units:
  - Main Production Plants
    - Olefins Plant

<sup>1</sup> Grievances are addressed in the Community Grievance Management Plan (CGMP, Ref: LSP-1S03-0001)



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.	
HSSE Department	Rev. 3
Security Plan	Page: 10 of 47

- High Density Polyethylene (HDPE) Plant
- Linear Low Density Polyethylene (LLDPE) Plant
- Polypropylene (PP) Plant
- Supporting Units
  - Central Utility Plant (CTU) (contains a Steam Generation Unit and Water Plant)
  - Tank Farm
  - Common Infrastructure
- 2) The Seaport, which consists of the following components:
  - Hydrocarbon Jetty to transfer feedstock and product for the Petrochemical Plant; and
  - Construction Jetty to import construction materials, including heavy lift modules.

The total land area that will be acquired for the Project is 464 ha, consisting of 398 ha for the Complex, and 66 ha for the specific port. In addition, there is a total water surface area of 194 ha that will be acquired for the seaport.

#### 1.4 APPLICABILITY

This Security Management Plan is applicable for the construction phase, it applies to all LSP employees, EPC Contractors, Subcontractors and visitors engaged on any portion of work associated with construction sites and accommodation camps, as detailed in the scope above.

#### 1.5 RELATIONSHIPS TO OTHER MANAGEMENT PLANS

This Security Plan is a detailed management plan, under the framework of the ESMS, other associated management plans and documents include the following

- Community Grievance Management Plan (CGMP, Ref: LSP-1S03-0001);
- Project Induced Influx Management Plan (PIIMP, Ref: LSP-1S01-0004);
- Worker Accommodation Management Plan (LSP-1S01-0004);
- Worker Training Management Plan (LSP-1S01-0003);
- Emergency Response Plan (LSP-1S01-0002);
- LSP Human Resources Policy (LSP document reference forthcoming).



LSP Doc. No : LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.	
HSSE Department	Rev. 3
Security Plan	Page: 11 of 47

#### 1.6 APPLICABLE STANDARDS

The applicable standards for this security plan are as follows:

- International Finance Corporation (IFC) Performance Standard (PS) 4: Community Health, Safety, and Security, 2012 and the corresponding Guidance Note;
- United Nation's Code of Conduct for Law Enforcement Officials (1979);
- Labour Code of Vietnam 2012 and all sublaws;
- Criminal Code of Vietnam No 100/2015/QH13 (27 November 2015); and
- International Ship and Port Security Code (ISPS Code).

Where both Vietnamese and international standards are applicable, the Project will aim to apply the most stringent.



LSP Doc. No : LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.	
HSSE Department	Rev. 3
Security Plan	Page: 12 of 47

#### 2 ROLES AND RESPONSIBILITIES

#### 2.1 INTRODUCTION

Having an appropriate organisational structure in place, with all people having defined roles and responsibilities, is essential to ensuring the overall success of this Security Plan.

Although LSP have overall responsibility for security at the Project site and common areas, the EPC Contractors are responsible for security at their own construction site (including offices, laydown areas, etc.) and worker camps. Where a subcontractor is managing the worker camp on behalf of the EPC Contractor, the subcontractor will have responsibility for the security of the camp.

To ensure security for the project is maintained at the same level and that there is a consistency of approach across the whole site, all parties will contract the same Security Contractor to perform the duties noted within this Security Plan. However, at the workers camps multiple Security Contractors may be required to ensure sufficient resources for worker camp security.

This section provides details of LSP's and EPC Contractors organisational structure with regards to onsite delivery of security.

#### 2.2 LSP CONSTRUCTION HSSE TEAM

LSP's health, safety, security and environmental (HSSE) team will lead the management of HSSE issues concerned with security. The LSP organisational chart to implement the requirements of HSSE is shown in the figure below. The specific roles and responsibilities of the HSSE team are shown in Chapter 5 of the LSP Construction Health, Safety and Environment Management Plan (LSP document ref: LSP-1S01-005).

#### 2.3 EPC CONTRACTOR

Each EPC Contractor will be responsible for the security of their Construction Site area, including offices, laydown areas, worker camps etc. The EPC Contractor or its subcontractor, in relation to the e worker camps, will manage the Security Contractor in accordance with the requirements of this Security Plan and will liaise with the LSP Security Team to ensure compliance with the overall aims of this Security Plan.

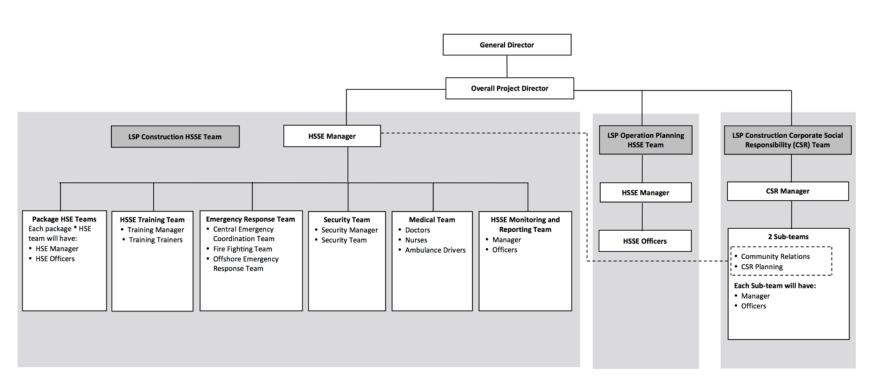


LSP Doc. No: LSP-1S01-0006

### Long Son Petrochemicals Co., Ltd.

HSSE Department	Rev. 2

Page: 13 of 47



Security Plan

#### Note: \*

Package A: Olefins Plant, Tank farm, Complex interconnecting pipelines/pipe racks, Land development of tank farm area, Topside facilities of hydrocarbon jetties, Complex Wastewater Treatment Unit and HP Flare/LP Flare system Package B/C/D: Polyolefins Plant (HDPE/PP/LLDPE)

Package F: Sea Port (excluding Top site of the Hydrocarbon Jetties and construction jetty which are under the scope of the Contractor Package A and Package I respectively)

Package G: Central Utility Plant (including Steam Generation Unit and Water Plant)

Package H: Common infrastructure of the Complex (including Administration Building, Laboratory Building, Canteen Building, Emergency Center, First Aid Center and Polyolefins Product warehouse)

Package I: Complex road including drainage, street lighting, CCTV, green area, Top site for construction jetty, Complex truck scale, and Blown film system

Package L: Land development work of the whole complex except tank farm area



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.	
HSSE Department	Rev. 3
Security Plan	Page: 14 of 47

#### 2.4 DESCRIPTION ROLES AND RESPONSIBILITIES

#### 2.4.1 LSP HSSE Manager

The role of the HSSE Manager is to lead the management of all HSSE issues. The HSSE Manager's responsibilities will include the following:

- Reviewing the HSSE performance reports and monitoring reports from the Security Contractor with regards to compliance to contract commitments, the national regulations and standards, including those relating to security;
- Leading HSSE audits and inspections, committees, and incident investigations of EPC Contractors and Subcontractor; and
- Reviewing the EPC Contractors' HSSE monthly and annually summary and reporting to LSP's Director, Government Authorities and Lender.

#### 2.4.2 LSP Security Manager

The role of the LSP Security Manager is to lead the management of all security issues. The LSP Security Manager responsibilities will include the following:

- Ensuring that the requirements of the Security Plan are applied by all LSP's staff, EPC Contractors and Subcontractors;
- Reviewing and approving the EPC Contractors Security Policy and Subcontractors Security Policy;
- Coordination with EPC to ensure mutual understanding of any community security risks coming both to and from the Project and strategies to mitigate those risks; and
- Submission of the monthly Security Report, meeting minutes and training records to the LSP HSSE Monitoring and Reporting Team.

#### 2.4.3 LSP Security Team

The LSP Security Team responsibilities will include the following:

• Provide security measures in accordance with the Applicable Standards;



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.	
HSSE Department	Rev. 3
Security Plan	Page: 15 of 47

- Liaise with local authorities and security services to support legal access to the site for them to perform their constitutional duties; and
- Prepare monthly Security Report for submission to LSP Security Manager.

#### 2.4.4 EPC Contractors

The EPC Contractors responsibility will include the following:

- Implementing and managing the security controls associated with the Construction Sites and Workers Accommodation Camps under their control. This shall include but will not be limited to the following:
  - Protection of Construction Site fence boundaries;
  - o Protection of all Workers Accommodation Camp boundaries;
  - Control of access control systems relating to personnel and vehicles;
  - Maintain records on project visitor, exit passes, issue of project identification (ID) card;
  - o Installation of adequate lighting at security control points;
  - Provide a proportional response to the overall security risk and threats to areas of responsibility;
  - o Provide security 24 hours a day, 7 days a week, 365 days a year;
  - o Ensure compliance with Labour Code 2012; and
  - o Installation and maintenance of fence line boundaries.
- Reporting of security incidents to the LSP Security Team;
- Consider and, where appropriate, investigate allegations of unlawful or abusive acts of security personnel, take action (or urge appropriate parties to take action) to prevent recurrence, and report unlawful and abusive acts to LSP Security Team;
- In coordination with LSP Security Team liaise with local authorities and security services to support legal access to the site for them to perform their constitutional duties;



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.	
HSSE Department	Rev. 3
Security Plan	Page: 16 of 47

- Submit monthly monitoring report to LSP Security Team;
- Take minutes of all meetings related to security and submit a copy to LSP Security Team;
- Report training records including attendee register for security personnel on a monthly basis to LSP Security Team; and
- Submit auditing report every 6 months to LSP Security Team.

#### 2.5 PRIVATE SECURITY PROVIDER VETTING

The Owner will be guided by the requirement contained in IFC PS4 to "make reasonable inquiries to ensure that those providing security are not implicated in past abuses" and by industry best practice in carrying out an appropriate due diligence of the designated security company.

#### 2.6 CONTACT INFORMATION

Employee contact information for the roles described in Section 2.4 is provided in Annex A.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.	
HSSE Department	Rev. 3
Security Plan	Page: 17 of 47

#### 3 SECURITY RISKS

A preliminary review of security risks identified the following risks during the construction phase of the Project:

- Unauthorised access to the Construction Sites or Workers Accommodation Camps;
- Disruption to the workforce resulting from confrontations or intimidation by disgruntled individuals from the community at the Construction Sites or Workers Accommodation Camps;
- Theft of property or equipment at the Construction Sites or Workers Accommodation Camps;
- Loss or damage to plant, equipment and personal property at the Construction Sites or Workers Accommodation Camps; and
- Breach of confidentiality concerned with documents or information.

LSP will require the security provider to undertake an updated security risk assessment prior to the commencement of major construction and update this Security Management Plan to take into account the need to ensure the respect for human rights and the protection of the local community as well as its own employees, assets and reputation.

#### 3.1 SECURITY PROCEDURE

The LSP Security Team and EPC Contractors in consultation with the local police shall implement a security procedure which identifies and responds to different situations of threats to security in a manner appropriate to the level of threat and with respect for human rights. This shall be based on local information, government concerns and direct information obtained.

#### 3.2 SECURITY CONTRACTORS REQUIREMENTS

The requirements of the Security Contractor are as follows:



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.	
HSSE Department	Rev. 3
Security Plan	Page: 18 of 47

- Provide unarmed<sup>1</sup> Security Guards for the protection of all personnel and property under their control;
- Provide security services 24 hours a day, 7 days a week, 365 days a year at the Controlled Entry Points under their control;
- Have the capability of operating project Security Access Control systems;
- Have the capability of conducting a security investigation as directed by LSP Security Manager and EPC Contractors.

#### 3.2.1 Security Guard Competency, Training and Duties

The Security Contractor shall use competent fully trained Security Guards, with the required qualifications and experience to fulfil their responsibilities. The Security Guards shall have appropriate uniforms and all necessary personnel equipment.

The CV's and training records of all Security Guards shall be supplied to the EPC Contractors who shall monitor the guarding standards of staff under their control.

The personal proposed for a supervisor position shall have had formal training, experience and ability relevant to the supervisory position.

All Security Guards shall be capable of conducting duties. Training records shall be made available in the first instance and during audits in order to demonstrate their capabilities.

#### **Security Guard Codes of Conduct**

As the individuals who may often be the first point of contact between the company and visitors, including community members, it is critical that security guards are held to a high standard when it comes to the code of conduct. The following codes of conduct are applicable for the Security Guards:

- Shall not accept any gratuities at any time;
- Shall remain alert and observe all activity in areas under their control;

<sup>&</sup>lt;sup>1</sup> The assessment of security risks did not identify risks that warrant the arming of private security guards or security management with lethal weapons.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.	
HSSE Department	Rev. 3
Security Plan	Page: 19 of 47

- Received appropriate training to report all incidents or violations to the EPC Contractor;
- Shall have no conflict of interests or hold a criminal record of any kind;
- Shall be respectful to all members of the community and labor force;
- Shall be motivated and willing to work in any weather condition;
- Be physically fit and able to perform all duties, roles, functions of security activities; and
- Have excellent dress and deportment.

#### **Security Guards Operations**

The security guards' operations will comprise of the following:

- Prevent unauthorised access to designated areas by persons or vehicles;
- Prevent unauthorised removal of material and/or equipment;
- Prevent entry of any contraband or prohibited items;
- Check validity of project entry/exit passes;
- Be trained and well informed about reacting appropriately and respectfully to requests for access or jobs by local community members or others;
- Prevent harassment or extortion of co-workers;
- Provide mobile patrols;
- Provide security monitoring, inspections and drills;
- Respond to emergency incidents;
- Prevent any illegal activity on project;
- Be trained and well versed in fire safety and fire extinguisher recognition;
- Report security incidents and infringements through the Security Contractor;



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 20 of 47	

- Be alert to fire risks and initiate actions, able to monitor and report during patrols; and
- Maintain security log books.

#### **Security Guard Duties**

The routine duties of the Security Guards will comprise of the following:

- Prevention of unauthorised access to the Constructions Sites at the fence line; and
- Provide protection through patrols inside the fence line perimeter. The patrols shall:
  - Check the integrity of the fence line;
  - Check all vehicles parked near the fence line have been registered with the Security Control Room;
  - Check all security lights around the fence line and premises adjacent to the fence line;
  - Check the security to all laydown areas;
  - o Report any incidents immediately to the Security Control Room;
  - Maintain radio or other communication link with Security Control Room;
  - o Other duties as directed; and
  - Ensure that all vehicles on site are parked in designated areas indicated for that purpose.

During times of construction on, or near, the perimeter fence that requires access through the fence, a security guard shall be placed at the location for the duration of the works.

To prevent unauthorised access at the Controlled Entry Points the security guards shall undertake the following duties:

• Check all visitor details (refer to Annex B for Visitor Entry Procedure to Construction Site and Site Offices);



LSP Doc. No: LSP-1S01-0006

Long	Son	<b>Petroc</b>	hemi	cal	s Co.	. Ltd.
-09	9011					,

HSSE Department	Rev. 3
Security Plan	Page: 21 of 47

- Check all materials leaving site (refer to Annex C for Materials Exit Procedure);
- Check for prohibited material or items brought onto site;
- Check all authorised entry to site;
- Record authorised entry to site by use of Identification (ID) Card unit;
- Other duties as directed;
- Communicate any incidents immediately to the Security Control Room;
- Ensure the entry points are manned at all times;
- Complete all logs, including Visitors Entry Pass and Materials Exit Pass;
- Complete searches of individuals/vehicles as directed;
- Complete handover reports to each shift on commencement of duty;
- Sign off issued equipment torches, metal detectors and telephone/radio;
- Perform regular checks in the vicinity of the Controlled Entry Points;
- Record any complaints or enquiries from individuals not requiring site access to the Security Control Room;
- Prevent all parking near or within the vicinity of the Controlled Entry Points;
- Complete the daily record log at the end of each shift; and
- Assist with Emergency Response incidents as directed.

The EPC Contractors shall ensure that there are no security shift changes during the busy times of the construction, i.e., security shift changes must be completed prior to the workers' main shift changes.

If it becomes necessary to detain someone in strict accordance with Vietnam law (Criminal Code No 100/2015/QH13 dated 27 November 2015), guards will notify their supervisor immediately, who will contact management and/or the public authorities immediately. The individual(s) will be detained for as brief a time as possible, in a



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 22 of 47	

safe environment free from harm, and in a manner consistent with the law and human rights principles.

#### **Security Guards Training Requirements**

The Security Contractor shall provide Security Guard training which shall include, but will not limited to the following:

- Use of Force;
- Knowledge of LSP organisation and structures;
- Knowledge of LSP labour regulations;
- Fire prevention and fire extinguisher use;
- Communication skills;
- Emergency response procedures including basic first aid;
- Report writing;
- Use of security and safety equipment;
- Basic reaction skills;
- Radio skills;
- Conflict management;
- Human rights; and
- Security Guards' Code of Conduct.

The training will be undertaken by an individual with the appropriate qualifications and will be to a level suitable and sufficient to permit the Security Guards to perform their role. The Labour Codes are applicable to the security staff. Therefore, the LSP Security Manager and EPC Contractor shall keep logs and records to demonstrate the training undertaken by each guard.

#### **Security Guard Discipline**

The LSP Security Manager and EPC Contractor shall use the following circumstances as a basis for the removal of Security Guards from the Project:

- Leaving a post or duty without the appropriate relief;
- Theft, which includes the unauthorised use of project equipment or facilities such as telephones, internet facilities or services and information technology equipment;



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	

Security Plan Page: 23 of 47

- Acceptance of any gift, gratuity in the line of duty;
- Insulting or offensive behavior;
- Consumption of alcohol or illegal substances or being under the influence or either while on duty;
- Making false reports or knowingly omitting information in a report;
- Sleeping on duty;
- Willful disobedience of instructions or neglecting duty; and
- Willful or carelessly permitting violations to project rules or directives.

Such dismissals from the project will comply with Labour Code 2012. Dismissed personnel may have the right to appeal in accordance with the Employee Grievance Procedure to be developed as part of LSP's Human Resources (HR) polices.

Security Guards are also prohibited from making any statement or comment verbally or in writing to any news agency, media or other individuals. Requests for information from news agencies or other individuals shall be forwarded in the first instance to the EPC Contractor and then to the LSP Security Manager for appropriate action.

#### 3.2.2 Use of Force

In the event any Security Guard is required to use force against an individual, the Security Guard shall:

- Attempt non-physical means first and only use force when necessary;
- Use only the minimum of force required, to effect purpose and keep it proportional to the threat;
- Operate strictly within the law and the authority given to them to use force;
- Minimize injury and damage;
- Render medical aid to injured person, including offenders; and
- Report any use of force as soon as possible to a supervisor who has responsibility for the guards.
- Private security guards will not be armed (in accordance with Vietnamese law) and will avoid lethal force in all circumstances unless they face a



LSP Doc. No: LSP-1S01-0006

## Long Son Petrochemicals Co., Ltd.

HSSE Department	Rev. 3
Security Plan	Page: 24 of 47

situation, as described under Articles 23 and 24 of the Vietnam Criminal Code 2015 (No. 100/2015/Q) where an 'urgent circumstance' requires them to inflict an amount of damage to prevent a greater damage to themselves or another person.

The use of force may need to be justified in any later hearing. The Contractor will have the responsibility for presenting the justification following any reportable incident.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 25 of 47	

#### 4 REPORTING AND AUDITING

#### 4.1 REPORTING

All security incidents of any descriptions shall be recorded by the security team.

Request for assistance shall be directed to the Security Control Room which will coordinate assistance and support if required. The Project's Emergency Response Plan (ref: LSP-1S01-0002) should be implemented if appropriate.

The EPC Contractors shall submit a security report on a monthly basis to the LSP Security Manager. The content of the report shall include but not be limited to the following:

- Summary of incidents; and
- Review of actions taken and status.

The EPC Contractors shall also consider and where appropriate, investigate all allegations of unlawful or abusive acts of security personnel, take action (or urge appropriate parties to take action) to prevent recurrence, and report unlawful and abusive acts to the LSP Security Manager. Any investigation should seek to protect the confidentiality of the information provided and, if applicable, the identity of victims and/or complainants.

The EPC Contractors shall report training records including attendee register for security personnel on a monthly basis to LSP Security Manager.

#### 4.2 AUDITING

LSP Security Manager will review each EPC Contractors Security Policy every six months and complete audits every six months to ensure that security is being undertaken in accordance within the requirements of the Security Plan.

All security procedures will be checked with unannounced physical security checks at any location.

The LSP Security Manager will submit audit results every 6 months to the LSP HSSE Manager.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 26 of 47	

#### 5 COMMUNICATION PROCEDURE

#### 5.1 MEETINGS

The LSP Security Manager and each EPC Contractor shall hold monthly meetings during the construction phase of the Project. Monthly meeting will cover the following, among others:

- Review of current security concerns;
- The introduction of new procedures where appropriate; and
- Sharing of information, directives and non-urgent communication.

On the authority of the LSP Security Manager, the following local agencies shall be invited to the monthly meetings when considered appropriate:

- Local Police;
- Fire Service; and
- Community Leaders.

All meetings shall have minutes taken with a copy submitted to the LSP Security Manager and each EPC Contractor.

#### 5.2 URGENT COMMUNICATION

All urgent communication which could increase the level of Project security will be issued to the LSP Security Manager and each EPC Contractor immediately on receipt.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 27 of 47	

## 6 REPORTING INTERNAL VIOLATIONS, GRIEVANCES FROM THIRD PARTIES, AND INVESTIGATIONS OF ALLEGED MISCONDUCT

#### 6.1 GRIEVANCES FROM EXTERNAL PARTIES

The security manager will coordinate with the Project's existing community grievance mechanism (refer to the Community Grievance Management Plan, LSP document ref: LSP-1S03-0001) to ensure it can accept and manage grievances related to security and that this is communicated to community members.

The community grievance mechanism is not intended for the reporting of security incidents.

#### 6.2 INVESTIGATING ALLEDED MISCONDUCT

Internal investigations, under the supervision of Management, shall be conducted whenever complaints are made against the department or its personnel regarding alleged misconduct, harassment, intimidation, discourtesy, or any other behavior potentially in violation of Vietnam law or Company policies and contractual agreements. If evidence supporting a criminal complaint is found, the investigation shall be directed to the proper authorities that have jurisdiction over the area concerned.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 28 of 47	

#### 7 CONSTRUCTION SITE SECURITY: RESOURCES AND EQUIPMENT

The Security Contractor shall be responsible for providing all security-related equipment at the Construction Sites. This will include but not be limited to the following:

- Security cabins of a suitable size that must provide electricity, ablution facilities and conform to Labour Code 2012;
- Sufficient communication equipment, including radios;
- Transportation to enable mobile security patrols and react to incidents or accidents;
- Sufficient lighting (Lux) at all Controlled Entry Points;
- Sufficient personnel to provide 24 hours a day, 7 days a week, 365 days a year security cover which includes relief;
- Full working schedules that must comply with Labour Code 2012; and
- A supervisor on each shift to monitor the on duty Security Guards.

#### 7.1 SECURITY CONTROL ROOM

The Security Contractor shall manage the Security Control Room 24 hours a day, 7 days a week, 365 days a year. The Security Control Room shall be the central point for all security requests and security-related reports at the construction site.

The staffing of the Security Control Room shall comprise of the following:

- Two (2) Operators (Radio); and
- One (1) Security Supervisor (Controller).

The roles and responsibilities of the Security Control Room staff shall comprise of the following:

- Monitor all security operations;
- Process all visitor applications;
- Provide emergency response to incidents;



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	

Security Plan Page: 29 of 47

- Control mobile roving patrols for the Constructions sites;
- Provide first instance response;
- Provide direct link between incident commanders;
- Call out emergency services;
- Provide communication link between Project and Police;
- Complete daily records and archive of data;
- Provide security to specific requests as directed; and
- Record all calls and radio communications for emergency incidents.

The minimum equipment requirements of the Security Control Room will comprise of the following:

- Telephones for non-emergency calls;
- Telephone for emergency calls;
- Information Technology (IT) equipment; and
- Radio communications system.

#### 7.2 SECURITY FENCING

The EPC Contractor shall provide and maintain fenced, lighted and secured compounds in areas under their control.

#### 7.3 SITE ALARM SYSTEM

The EPC Contractor shall provide and maintain a public address/tannoy system and a site alarm/siren for use in emergency in areas under their control.

The tannoy and alarm siren shall be controlled through the Security Control Room.

A temporary system of Site Alarms shall be in place prior to the establishment of the permanent plant alarms. These may consist of hand help portable sirens or a similar temporary system capable of alerting all affected personnel.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 30 of 47	

#### 7.4 CAR PARKS

The Construction Site car parks shall have security fencing installed at the perimeters. The entrance / exits to the Construction Site will have road vehicle barriers and walkway for pedestrians.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 31 of 47	

#### 8 CONSTRUCTION SITE: PROJECT ACCESS AND CONTROL SYSTEM

To prevent unauthorized access to areas at the Construction Site, access control units will be installed.

#### 8.1 PERSONNEL AND VEHICLE ACCESS

Construction site access will be controlled by an ID Card. The ID Card will be issued to all individuals accessing the Construction Site on completion of the HSSE&S Induction Training (refer to LSP-1S01-003 for details on the HSSE&S Induction Training).

All individuals will present themselves to a designated 'badge unit', details of the individual will be recorded on the database and a photograph taken at the time of attending the badge unit. The badge will only be issued to the individual attending the badging room in person.

The system will also apply to LSP Employees and EPC Contractors Employees accessing the Construction Site.

#### 8.2 INDIVIDUAL DATA RECORD

The individual's data shall be recorded on the Project server built for purpose and shall include the following as a minimum:

- Full name (no nickname or common use names);
- Company;
- Company Staff Number; and
- Assignment Details.

#### 9 CONSTRUCTION SITE: PROJECT SECURITY OPERATIONS

#### 9.1 SECURITY SEARCH

Any person or vehicle entering or leaving the Construction Site is subject to a security search for prohibited items. The Security Contractor shall be responsible for carrying out the security searches.

The Security Contractor can inspect lunch containers, packages, bundles, toolboxes and equipment at any time within the Construction Site.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department Rev. 3		
Security Plan	Page: 32 of 47	

Contraband materials include, but are not limited to, the following:

- Unauthorised alcohol;
- Illegal substances;
- Weapons;
- Explosives or pyrotechnics;
- Company tools or equipment without authorized permission for removal from site.

In addition, vehicles entering the Construction Site may be subject to the following spot checks for contrabands:

- Vehicle interior;
- Trunk (boot) area of vehicle;
- Underneath hood (bonnet) of vehicle;
- · Behind grill of vehicle; and
- Under carriage of vehicle.

#### 9.2 CONSTRUCTION SITE WORKERS DISCIPLINE

All security breaches shall be reported and investigated. If proven the person(s) may be subject to a discipline hearing or disciplined in accordance with Labour Code 2012.

Security breaches include but are not limited to the following:

- False/misrepresentation at any security point;
- Gambling;
- Fraud;
- Theft;
- Assault, fighting and/or disorderly behaviour;
- Unauthorized use of or possession of alcohol;



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 33 of 47	

- Possession of illegal substances;
- Possession of any firearm or weapon;
- Harassment or extortion of co-worker;
- Possession of stolen goods;
- Drunk and / or disorderly behavior; and
- Failing to observe all lawful directions by security.



LSP Doc. No: LSP-1S01-0006

Long Son	Petroc	hemical	s Co.,	Ltd.
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HSSE Department	Rev. 3
Security Plan	Page: 34 of 47

#### 10 OFFICE SECURITY

#### 10.1 OFFICE ACCESS

The offices should be secured by Security Guards with the purpose of ensuring that only authorised staff with ID cards or visitors enter the office building.

#### 10.2 OFFICE VISITOR LOG

A visitor log will be maintained by the Security Guard at the entrance to each office where the visitor will be held until the host collects the visitor at the reception point.

The visitor log shall record the following:

- Name of visitor;
- Host;
- Contact telephone number;
- Company;
- Reason for meeting; and
- Time In/Out.

The visitor shall be issued with a clearly marked Visitor Badge which will be visible during the visit. At the end of the visit the Visitor Badge will be collected by the Security Guard.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 35 of 47	

#### 11 PORT SECURITY

During construction, port security will be controlled by the Security Control Room with regular patrols of the area. Port Security will be the responsibility of the Security Contractor during the construction.

If any additional risks are identified, a security procedure will be created to mitigate against the risks, by the use of additional staff, patrols or static security posts.

All ship entry to the port area shall be subject to the directives, policy and procedures in accordance with the International Ship and Port Security (ISPS) Code.

Entry to the country by any seaman of a ship arriving at the port shall be dealt with by the Vietnam Immigration Authorities.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 36 of 47	

#### 12 WORKERS ACCOMODATION CAMP SITE SECURITY

The Workers Accommodation Camp security creates additional risks and threats from an enclosed community. The specification for the workers accommodation is detailed in the Workers Accommodation MP (ref: LSP-1S01-0004).

The EPC Contractor and Subcontractors shall have overall responsibility for all Workers Accommodation Camp security under their control.

The security risk at the Workers Accommodation Camps comprises of the following:

- Unauthorised access;
- Worker unrest; and
- Theft and intimidation.

#### 12.1 WORKERS ACCOMMODATION SECURITY PLAN

Prior to occupation of the workers accommodation the EPC Contractor or Subcontractor shall prepare a Workers Accommodation Security Plan for the accommodation under their control which will be submitted to the LSP Security Manager for approval.

The Workers Accommodation Security Plan shall identify any risk or threat to the safety of workers within the camp of concern as well as any risk posed to the surrounding communities by the presence of the camp and the activities of the workers.

The Workers Accommodation Security Plan shall address how the EPC Contractor or Subcontractor shall mitigate risks and threats by providing details of the following:

- Workers accommodation security policy and procedures;
- Organisation chart of the Workers Accommodation Security Departments;
- Roles and responsibilities of security staff;
- Numbers of staff and organization for workers accommodation security operation;



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	

Page: 37 of 47

• Employment policy for security staff including background checks and suitability for employment;

Security Plan

- Training requirements for workers to include clear requirements on duties and responsibilities, use of force, and the importance of respecting workers' and community members' human rights;
- Security Contractors Security Team training program;
- Security emergency procedures and measures to ensure that the facilities are adequately protected;
- A self-Audit Program;
- Communication services (mail, telephone and internet);
- Security of personal property and items within accommodation units; and
- Security of recreational facilities.

#### 12.2 WORKERS ACCOMMODATION CAMP SECURITY REQUIREMENTS AND DUTIES

#### 12.2.1 Controlled Entry Points

The Controlled Entry Points to the accommodation camps shall be managed by security 24 hours a day, 7 days a week, 365 days a year.

Security Guards will control access/egress by visually inspecting ID Cards. Individuals who are not authorised shall not be permitted entry.

#### 12.2.2 Visitors Procedure

Visitors may be subject to a security search on entering the accommodation camps, to ensure that no contraband is being carried. The visitors are required to submit identification to the Security Guard who will issue a temporary badge to the visitor which must be worn and displayed all times while at the worker's accommodation. The following details shall be recorded and archived at the accommodation camp by the Security Contractor:

- Name of visitor;
- Host Name;



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	

Security Plan	Page: 38 of 47

- Company/Contact Point;
- Time In; and
- Time Out.

On leaving the accommodation camp, the visitor's temporary badge will be submitted to the Security Guard in order to retrieve their identification.

The following additional mitigation measures will be implemented for security at the accommodation camps:

- All visitors must leave the workers accommodation by 22h00;
- Visitors will be met at the access gate by the host;
- The host will be responsible for the visitor and must be escorted at all times;
- Only one visitor will be permitted for each individual resident; and
- The visitor will not be permitted to use any of the recreational facilities, unless part of an agreed sporting event organised for the benefit of the residents.

#### 12.2.3 Workers Accommodation Discipline

The Security Contractor shall record all incidents and investigate any individuals who may be subject to a discipline hearing. The Security Contractor may request discipline procedures be undertaken by the EPC Contractor or Subcontractor management, as applicable.

The issues which may warrant immediate removal of workers from the workers' camp include the following:

- False/misrepresentation at any security access point;
- Gambling;
- Fraud;
- Fighting and Disorderly behavior;



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	

Security Plan

Page: 39 of 47

- Assault;
- Possession of a firearm or other weapon;
- Possession of stolen tools;
- Harassment or extortion towards co-workers;
- Unauthorised possession of alcohol;
- Possession of illegal substances; and
- Any act that could jeopardise the safety and security of the Project or other workers.

#### 12.2.4 **Workers Accommodation Security Search**

Any person entering or exiting the accommodation camps may be subject to a security search for prohibited items. The Security Guards of the Security Contractor shall be responsible for undertaking security searches.

The Security Contractor may enter any accommodation site and conduct a planned search with the relevant EPC Contractors and Subcontractor's management prior approval and with a representative of one or both of them in attendance.

Contraband materials include, but are not limited to the following:

- Alcohol;
- Illegal substances;
- Weapons;
- Explosives;
- Stolen tools and equipment.

#### Personnel

Personnel searches shall be undertaken when probable causes exist or when the security level changes.



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Page: 40 of 47	

#### **New Residents**

In order for no contrabands to be brought into the accommodation camp, Security Guards shall require owners to open their bags for inspection. A more detailed inspection of the bag shall be made in the presence of the owner if any contents of the bag are deemed to be suspicious.

#### **Vehicles**

All buses shall be searched for contrabands on a daily basis. The security searches will be undertaken at access points for buses entering and departing the workers accommodation site.

In addition, random searches for contrabands will be undertaken for buses returning from shopping trips or similar at the access points.

#### **Accommodation Units**

The Security Contractor shall complete a random walk through of accommodation units on a regular basis. Resident's property shall not be touched or opened unless security see or suspect contraband or there is probable cause authorising a search. Security Guards shall be present during a search.

Security Guards shall respect resident's right of privacy without endangering the welfare and safety of the rest of the camp.



LSP Doc. No: LSP-1S01-0006

### Long Son Petrochemicals Co., Ltd.

3	
HSSE Department	Rev. 3
Security Plan	Page: 41 of 47

ANNEX A - EMPLOYEE CONTACT DETAILS ASSOCIATED WITH SECURITY PLAN



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Annex A

Long Son Petrochemicals Co., Ltd

LSP Doc. No: LSP-1S01-0006

Role	Contact Details*
LSP HSSE Manager	Mobile Number:
	Email:
LSP Security Manager	Mobile Number:
	Email:
EPC Contractors Security Manager (insert EPC Contractor name)	Mobile Number:
	Email:
EPC Contractors Security Manager (insert EPC Contractor name)	Mobile Number:
	Email:

Security Plan

<sup>\*</sup>Any change in respect to employees, the contact details will need to be amended as soon as the role has been reassigned.



LSP Doc. No: LSP-1S01-0006

# Long Son Petrochemicals Co., Ltd. HSSE Department Rev. 3 Security Plan Annex B

ANNEX B - VISITOR ENTRY PROCEDURE FOR CONSTRUCTION SITE AND SITE OFFICIES



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Annex B	

#### **Visitor Entry Procedure for Construction Site and Site Offices**

Visitors to the Construction Site / Site Offices shall require the approval of the EPC Contractors Security Manager for areas under their control. In order that security are aware of personnel on site, for emergency response requirements, details of any visit and visitor should be submitted to the relevant EPC Contractors Security Manager a minimum of 24 hours before any visit.

The following details shall be submitted to the EPC Contractors Security Manager:

- Contact Reference;
- Requestors Company Name;
- Date Requested;
- Contact Name/ Position/ Phone Number/ Office & Mobile;
- Date of Visit / Arrival Time/ Approximant Exit Time;
- Full Details of visitor/ Name/ Company/ Link to Requesting Company and Contract; and
- Reasons for the visit and areas to be visited.

These details will be forwarded to the relevant Controlled Entry Point on the evening prior to the visit for Security Guard information.

The visitor shall be met by the host prior to be access being authorised to any part of the Construction Site / Site Offices.

The host on meeting the visitor shall undertake the following:

- Ensure that the visitor receives a HSSE briefing prior to entering any part of the Construction Site /Site Offices and understands the HSSE requirements applicable to their visit. The HSSE briefing shall include relevant information on location of muster points and types of emergency siren;
- The visitor shall be escorted at all times and the host remains responsible for the visitor at all times whilst at the Construction Site / Site Offices;
- Any visitor attending the Construction Site / Site Offices for longer than one day must undergo a formal safety induction;



LSP Doc. No: LSP-1S01-0006

Long Son Petrochemicals Co., Ltd.		
HSSE Department	Rev. 3	
Security Plan	Annex B	

- Prior to entering any part of the Construction Site the host must provide the following safety equipment to the visitor:
  - Helmet (Hard Hat);
  - Safety Shoes;
  - Safety Glasses/Spectacles; and
  - Additional safety equipment based on the hazards associated with the location to be visited.

All visitors on arrival at the Controlled Entry Point will receive a temporary access pass once registered and appropriate visitor ID has been provided to the Security Guard. On completion of the visit the temporary access pass shall be returned to the Security Guard in exchange with for the submitted visitor ID.

Details of all visitors will be stored within the data base held within the Security Control Room and archived for auditing purposes.



LSP Doc. No: LSP-1S01-0006

# Long Son Petrochemicals Co., Ltd. HSSE Department Rev. 3 Security Plan Annex B

ANNEX C - MATERIALS EXIT PROCEDURE



LSP Doc. No: LSP-1S01-0006

## Long Son Petrochemicals Co., Ltd. HSSE Department Rev. 3 Security Plan Annex B

#### **Materials Exit Procedure**

All materials exiting the Construction Site shall be accompanied by an approved Material Exit Pass (MEP) authorised by material control personnel and authorised signatories.

The MEP shall list all materials by item, a description of the material and serial numbers.

No materials shall be permitted to leave the Construction Site without the appropriate documentation.

The MEP shall be signed by authorised signatories, details of which will be known by the Security Contractor.

The MEP shall consist of the following:

- One original; and
- Two copies.

The driver at the Controlled Entry Point shall submit a copy of the MEP to the Security Guard. The Security Guard shall conduct a search of all vehicles and the items they carry before exiting the Construction Site.

One copy of the MEP will be retained by the Security Contractor and logged with the Security Control Room.

The Security Guard will also record the vehicle type and plate number being used.

Any vehicle attempting to leave the project with materials without a completed MEP shall be stopped and refused exit.