



# Environment, Health and Safety Requirements for Mode 1 Contractors

Effective Date: December 15, 2017  
Suncor Owning Group: Environment, Health & Safety

Controlled Document  
Copyright © 2017 Suncor Energy Inc. All rights reserved.



## Contents

|   |   |    |
|---|---|----|
| 1 | About this document .....                           | 3  |
| 2 | EH&S Requirements .....                             | 4  |
|   | 2.1 Contract EH&S Plan .....                        | 4  |
|   | 2.2 Hazard Management .....                         | 4  |
|   | 2.3 Management of Change .....                      | 5  |
|   | 2.4 Emergency Management .....                      | 5  |
|   | 2.5 Learning and Competency .....                   | 5  |
|   | 2.6 Regulatory Compliance .....                     | 5  |
|   | 2.7 Incident and Corrective Action Management ..... | 6  |
|   | 2.8 EH&S Reporting .....                            | 6  |
| 3 | Contract EH&S Plan Overview and Requirements .....  | 7  |
|   | 3.1 Scope of Work .....                             | 8  |
|   | 3.2 Health & Safety Management .....                | 8  |
|   | 3.3 Environmental Management .....                  | 9  |
|   | 3.5 Sub-Contractor Management .....                 | 9  |
|   | 3.6 Leadership Accountability .....                 | 9  |
|   | 3.7 Audits and Assessments .....                    | 10 |
| 4 | Terms and Definitions .....                         | 11 |
|   | Appendix A – Contract EH&S Plan Help .....          | 12 |



## 1 About this document

---

### Purpose

This document provides the Environment, Health & Safety (EH&S) and regulatory requirements a Contractor must comply with.

Section 2 of this document provides the mandatory EH&S requirements a Contractor must meet in order to work with Suncor.

Section 3 of this document provides the specific requirements that must be detailed in the Contract EH&S Plan.

**Notwithstanding anything in this document to the contrary, nothing in this document amends or in any way modifies the allocation of risks and liabilities set forth in the applicable Contract governing the Scope of Work.**

---

### Scope

This document is part of Suncor's Element 10 Contractor Management.

---

### Target Audience

This document applies to Contractors performing Mode 1 Contractor Hands-on Work at Suncor Energy Inc. and subsidiaries over which Suncor has operational control.

---

## 2 EH&S Requirements

The following EH&S requirements are mandatory and must be met by the Contractor.

### 2.1 Contract EH&S Plan

#### Contract EH&S Plan

- 2.1.1 The Contractor must develop and submit a Contract EH&S Plan for the SOW, in accordance with section 3 of this document.
- 2.1.2 Upon award, the Contractor must finalize the Contract EH&S Plan in consultation with Suncor.
- 2.1.3 The Contractor must participate in a pre-mobilization meeting with Suncor and acknowledge acceptance of the approved Contract EH&S Plan prior to executing On-site Hands-on Work.
- 2.1.4 The Contractor must obtain approval from Suncor for any changes to the approved Contract EH&S Plan.
- 2.1.5 Suncor may audit any portion of the approved Contract EH&S Plan throughout the duration of the work.
- 2.1.6 The Contractor and Contractor Personnel are accountable for executing the SOW while adhering to the approved Contract EH&S Plan.
- 2.1.7 The Contractor must inform Suncor of the names of the Contractor Personnel who direct work or have authority over other Contractor Personnel and any change in such persons when the Contractor is directing work.
- 2.1.8 The Contractor must ensure that the Contract EH&S Plan is readily available to Contractor Personnel.

### 2.2 Hazard Management

#### Hazard Management

- 2.2.1 The Contractor must comply with all hazard controls identified by Suncor.
- 2.2.2 The Contractor must comply with Suncor's hazard management processes and programs including:
  - i. applicable business unit field assessment tools (for example, field level hazard assessment (FLHA), field level risk assessment (FLRA) or job hazard analysis (JHA)); and
  - ii. applicable business unit field observation program (for example, workplace observation, safety observation, or focus observation programs);
  - iii. orientations, safety meetings and toolbox talks.

- 2.2.3 The Contractor must comply with Suncor’s *Life Saving Rules*.
- 2.2.4 The Contractor must comply with *CO-S22 Contractor Alcohol and Drug Standard*.
- 2.2.5 Contractor Personnel must wear the appropriate personal protective equipment (PPE) as detailed in Suncor’s business unit governing document(s).
- 2.2.6 All hazardous products must be approved by Suncor prior to use at the Work Site. The Contractor must submit safety data sheet (SDS) information before hazardous products are transported.
- 2.2.7 The Contractor must coordinate the work with surrounding activities, including those of subcontractors, to ensure risks, particularly safety risks, are properly identified and managed.

**2.3 Management of Change**

**Management of Change**

- 2.3.1 The Contractor must comply with Suncor’s *SUN-00097 Standard for Management of Change* and the applicable business unit site-specific management of change governing document.

**2.4 Emergency Management**

**Emergency Management**

- 2.4.1 The Contractor must comply with Suncor’s business unit site-specific Emergency Response Plan (ERP).

**2.5 Learning and Competency**

**Learning and Competency**

- 2.5.1 The Contractor must ensure Contractor Personnel are adequately trained and competent to perform the SOW, in accordance with the applicable OHS legislation.
- 2.5.2 The Contractor must ensure Contractor Personnel meet the mandatory training requirements to execute the SOW.
- 2.5.3 The Contractor must maintain all training and certification records of the Contractor Personnel and provide this documentation to Suncor upon request.
- 2.5.4 If directing work, the Contractor must ensure supervisors are adequately trained and competent to perform the SOW and meet their supervisory obligations under the applicable OHS legislation.

**2.6 Regulatory Compliance**

**Regulatory Compliance**

- 2.6.1 The Contractor must resource its organization to ensure compliance with all regulatory requirements, including all federal, state, provincial and municipal

statutes, regulations, by-laws and associated standards, procedures, guides, codes and best practices for the SOW.

- 2.6.2 The Contractor must ensure that equipment and materials being used or installed on a Suncor Work Site meet applicable regulatory requirements, including the need to have manufacturers' specifications present with equipment. The Contractor must ensure that equipment is used in a manner consistent with manufacturers' specifications.
- 2.6.3 The Contractor must immediately notify Suncor of any event that may require regulatory reporting. Suncor is the Prime Contractor and will report to the applicable regulator as required.
- 2.6.4 The Contractor must obtain Suncor's approval for non-regulatory external communications.
- 2.6.5 The Contractor must ensure that Contractor Personnel are aware of their rights related to the Joint Work Site Health and Safety Committee. The Contractor must inform Contractor Personnel as to their representative on the Joint Work Site Health and Safety Committee.
- 2.6.6 The Contractor must meet or exceed Suncor's Business Area Refusal to Work Program.
- 2.6.7 The Contractor must meet or exceed Suncor's CO-055E Harassment and Workplace Violence Free Working Environment Policy.
- 2.6.8 The Contractor must have a Risk Based Health Assessment Standard that meets or exceeds Suncor's Risk Based Health Assessment Program Standard SUN-00222.

## **2.7 Incident and Corrective Action Management**

### **Incident and Corrective Action Management**

- 2.7.1 The Contractor must comply with Suncor's *SUN-00010 Incident Management Standard* and Suncor's *SUN-00189 Corrective Action Standard*, including:
  - i. immediate reporting of any incident, with or without loss, to Suncor;
  - ii. participation in incident investigations; and
  - iii. implementation of corrective actions as directed by Suncor.
- 2.7.2 The Contractor must comply with Suncor's *SUN-00217 Injury and Illness Classification Document*.

## **2.8 EH&S Reporting**

### **EH&S Reporting**

- 2.8.1 Upon award, the Contractor and Suncor will confirm the required EH&S statistics the Contractor must provide throughout the execution of the SOW.

### 3 Contract EH&S Plan Overview and Requirements

**Contract EH&S Plan Overview**

Suncor will determine the overall consequence ranking based on the hazards identified for the specific SOW. This ranking is documented within the Hazard Identification Checklist. The assigned consequence ranking determines the minimum required content (sections) for the Contract EH&S Plan.

The Contract EH&S Plan must include the sections indicated as “Required” in the following table. For any SOW, there are two levels of consequence ranking: low (C1 - C4) and high (C5 - C6).

| Section # | Contract EH&S Plan Requirements | C1 - C4      | C5 - C6  |
|-----------|---------------------------------|--------------|----------|
| 1.1       | Scope of Work                   | Required     | Required |
| 1.2       | Health & Safety Management      | Required     | Required |
| 1.3       | Environmental Management        | Required     | Required |
| 1.4       | Learning and Competency         | Required     | Required |
| 1.5       | Subcontractor Management        | Required     | Required |
| 1.6       | Leadership Accountability       | Not Required | Required |
| 1.7       | Audits and Assessments          | Not Required | Required |

Regardless of the consequence ranking, Suncor expects the Contractor to have processes and systems in place to meet all regulatory, environment, health and safety legal requirements.

**Contract EH&S Plan Format**

The Contract EH&S Plan must be scope specific and must follow the same format and sequence as indicated in sections 3.1 – 3.7 of this document, including section numbering and content. Any additional details or sections the Contractor thinks may be necessary for the Contract EH&S Plan should be added after these sections.

|  |            |   |
|--|------------|---|
|  | <b>3.1</b> | <b>Scope of Work</b>  |
| <b>Scope of Work</b>                   | 3.1.1      | The Contractor must include details of the work covered by the Contract EH&S Plan.  |
|  | <b>3.2</b> | <b>Health &amp; Safety Management</b>   |
| <b>Hazard Assessment</b>               | 3.2.1      | The Contractor must review Suncor's Hazard Identification Checklist and identify any additional health and safety hazards as required.  |
|  | 3.2.2      | The Contractor must provide a scope specific assessment that expands on the health and safety hazards (as defined in the Hazard Identification Checklist) and will include: <ul style="list-style-type: none"> <li>i. the tasks to be performed;</li> <li>ii. identification of the health and safety hazards;</li> <li>iii. risks prior to the application of controls;</li> <li>iv. identification of controls to mitigate the health and safety hazards; and</li> <li>v. residual risk after the control has been applied.</li> </ul>  |
| <b>Hazard Assessment Communication</b> | 3.2.3      | The Contractor must disclose how the scope specific hazard assessment, including hazards and controls will be communicated to supervision and other Contractor Personnel.   |
| <b>Life Saving Rules</b>               | 3.2.4      | The Contractor must indicate how Suncor's <i>Life Saving Rules</i> will be communicated to Contractor Personnel, including how the Contractor will verify compliance. This may be communicated during site orientation, through toolbox talks and/or safety meetings on an ongoing basis.   |
| <b>EH&amp;S Plan Communication</b>     | 3.2.5      | The Contractor must indicate how the Contract EH&S Plan will be made available to all Contractor Personnel.   |
| <b>Fit for Duty</b>                    | 3.2.6      | The Contractor must indicate how the health and welfare of the Contractor Personnel will be ensured, including: <ul style="list-style-type: none"> <li>i. indicating who the service provider is for post-incident and reasonable cause alcohol and drug testing;</li> <li>ii. providing an understanding of what controls are in place for prescription medication in the workplace;</li> <li>iii. determining health and wellness requirements to perform scope of work (for example, medical assessments, audiometric and vision testing); and</li> <li>iv. requirements to ensure PPE, such as respirators or fall protection, are properly fit tested, used and maintained.</li> </ul> |



**Environmental Management**

**3.3 Environmental Management**

- 3.3.1 The Contractor must review Suncor's *Hazard Identification Checklist* and identify any additional environmental factors or hazards relevant to the SOW.
- 3.3.2 The Contractor must identify controls to manage the environmental hazards.

**Learning and Competency**

**3.4 Learning and Competency**

- 3.4.1 The Contractor must provide a training matrix that includes the Suncor mandatory training as well as specific SOW training requirements.
- 3.4.2 The Contractor must indicate how competency of Contractor Personnel to execute the SOW, in accordance with the applicable OHS legislation, will be ensured.
- 3.4.3 If directing work, the Contractor must indicate how the competency of supervisors to execute the SOW, and meet their supervisory obligations under the applicable OHS legislation, will be ensured.

**Note:** Upon award, the Contractor must work with Suncor to update the training matrix to ensure mandatory Suncor training requirements are defined.

**Subcontractor Management**

**3.5 Subcontractor Management**

- 3.5.1 If the Contractor is using subcontractors to perform any portion of the SOW, the Contractor must:
  - i. provide the names of the subcontractor(s);
  - ii. define the specific scope the subcontractor(s) will be executing; and
  - iii. describe how subcontractor(s) will be held accountable to meet the EH&S requirements within the approved Contract EH&S Plan.

**Leadership Accountability**

**3.6 Leadership Accountability**

- 3.6.1 The Contractor must provide a summary of the expectations and frequency Contractor leaders engage in the following:
  - i. safety discussions (for example, toolbox talks, safety meetings);
  - ii. investigation of incidents;
  - iii. workplace observation systems; and
  - iv. work site EH&S inspections and safety steering committees.

- 3.6.2. When directing work, the Contractor must provide:
  - v. an organization chart listing the supervisors or Contractor Personnel directing work;
  - vi. roles and responsibilities of the supervisor(s) or other Contractor Personnel directing work; and
- 3.6.3 If directing work, and there is change in supervision Suncor must be notified.

### **3.7 Audits and Assessments**

#### **Audits and Assessments**

- 3.7.1 The Contractor must provide a summary of the audit and assessment activities for monitoring EH&S performance against the Contract EH&S Plan that includes:
  - i. a schedule or frequency of self-assessments and/or audits; and
  - ii. a process for tracking and managing corrective actions.



## 4 Terms and Definitions

| Term                                   | Definition  |
|--|---|
| <b>Contract EH&amp;S Plan</b>          | The SOW-specific EH&S Plan developed by the Contractor written in accordance with the EH&S requirements for the selected Contractor Mode.   |
| <b>Contractor</b>                      | Any third party contracted by Suncor to complete On-Site work.  |
| <b>Contractor Personnel</b>            | Personnel that are employed by the Contractor to perform On-site work, including, where applicable, subcontractor personnel.  |
| <b>Hands-on Work</b>                   | Any On-site physical work activity performed or the direction or supervision of On-site physical work activities. Hands-on Work includes operations, maintenance or construction activities such as (but not limited to) operating equipment, using tools or working at height.   |
| <b>Hazard Identification Checklist</b> | A tool that provides an inventory of scope-specific hazards that can be reasonably identified by Suncor. This list is not all-encompassing and may need to be supplemented by the Contractor.   |
| <b>Mode 1 Contractor</b>               | Applicable where the Contractor provides people, processes and/or equipment for the execution of the Scope of Work under the oversight, instructions and EH&S management system of Suncor. The Contractor has a management system to provide assurance that the Contractor Personnel, including subcontractors, are qualified and fit for the work and that the processes, tools, materials and equipment they provided by the Contractor are properly maintained and suitable for the work. The Contractor reports EH&S performance data, and incidents to Suncor. |
| <b>Scope of Work (SOW)</b>             | A scope of work document that clearly describes the materials or services to be supplied, and defines all requirements and obligations of both Suncor and the Contractor, including, but not limited to environmental, health and safety, technical standards, specifications, quality, regulatory, and time/schedule.  |
| <b>Work Site</b>                       | A location where a worker is, or is likely to be, engaged in any occupation.  |

## Appendix A – Contract EH&S Plan Help

### A1 About this document

This document assists Contractors with the development of a Mode 1 Contractor Contract EH&S Plan in compliance with Suncor Energy Inc. (Suncor) Environment, Health and Safety (EH&S) Requirements for Mode 1 Contractor, SCM-RQ-0001.

One of the most important contract management decisions is to identify the responsibilities for managing EH&S risks between Suncor and the Contractor. You have been identified by Suncor as a Mode 1 Contractor for the applicable scope of work. As a Mode 1 Contractor your activities will be integrated with Suncor's and you will use many of Suncor's EH&S management system documents as will be detailed within your Contract EH&S Plan. You must bring trained, competent personnel to the SOW with Suncor and manage those personnel as per the requirements of your Contract and Contract EH&S Plan.

### A2 Section 2 EH&S Requirements

Section 2 of the EH&S Requirements for Mode 1 Contractor communicates mandatory EH&S requirements that a Contractor must comply with to work with Suncor. The elements described within this section must be acknowledged by the Contractor and complied with as a term to the Contract with Suncor. These requirements, however, are not required as a section of the Contract EH&S Plan. The information provided is also present in the Contract Documentation.

### A3 Section 3 Contract EH&S Plan Overview and Requirements

#### Before you start

Section 3 of EH&S Requirements for Mode 1 Contractor outlines the required framework for your Mode 1 Contractor Contract EH&S Plan.

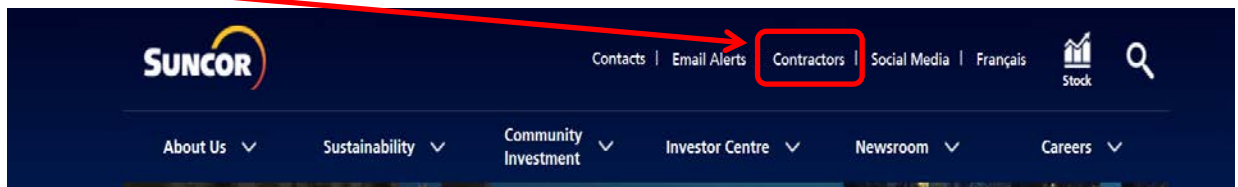
Tip: To assist you with the development of your Contract EH&S Plan you will receive the documents outlined in this table from Suncor. If you are missing any of these documents, contact your Suncor representative.

| Suncor provided documentation | Description   | Action   |
|-------------------------------|---|--|
| Scope of Work                 | Describes On-site services and materials to be supplied including all requirements and obligations of both Suncor and the Contractor. | Review and understand the SOW and its implications to your Contract EH&S Plan. |

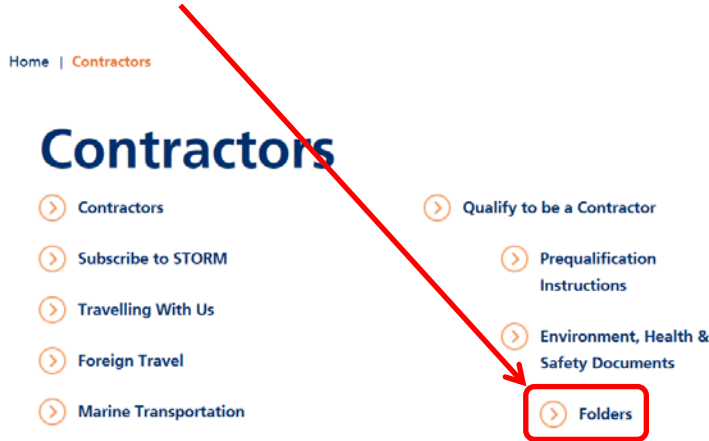
|   |   |  |
|---|---|--|
| <p>Hazard Identification Checklist</p>                          | <p>Identifies hazards relevant to the scope of work and provides a consequence rank.</p> <p>Specifically, it will identify the risk consequence as C1-C4 (low) or C5-C6 (high).</p> | <ol style="list-style-type: none"> <li>1. Review your Hazard Identification Checklist as provided by Suncor to ensure that all hazards that are directly related to the SOW are identified. Note the overall consequence ranking assigned to SOW. This determines the minimum required content (sections) for your Contract EH&amp;S Plan.</li> <li>2. If a hazard is not listed that you believe applies to the work, add it and ensure that it is mitigated as part of the Contract EH&amp;S Plan development.</li> <li>3. All added hazards should be discussed with Suncor prior to addition to the Contract EH&amp;S Plan.</li> </ol> |
| <p>Administrative Controls</p>                                  | <p>A list of Suncor administrative controls to be used to mitigate the hazards identified in the Hazard Identification Checklist.</p>   | <ol style="list-style-type: none"> <li>1. Retrieve the identified Suncor controls from <a href="http://www.Suncor.com">www.Suncor.com</a>. (Instructions on how to retrieve these documents can be found below this table).</li> <li>2. Validate the list of hazard controls.</li> <li>3. If hazards have been added to the Hazard Identification Checklist the administrative controls must also be identified to complete hazard assessment.</li> </ol>  |
| <p>EH&amp;S Requirements for Mode 1 Contractor, SCM-RQ-0001</p> | <p>Outlines mandatory Suncor EH&amp;S requirements (Section 2) and provides requirements to be included within the Contract EH&amp;S Plan (Section 3).</p>                          | <p>Review Mode 1 Contractor EH&amp;S requirements, SCM-RQ-0001 then complete and submit a Contract EH&amp;S Plan to Suncor.</p>  |
| <p>Training requirements</p>                                    | <p>Suncor will provide a list of mandatory training.</p>  | <p>Create a training matrix that includes the Suncor mandatory training as well as your SOW specific training.</p>   |

**Retrieving administrative controls**

1. Navigate to <http://www.Suncor.com>
2. Click Contractors



3. Click folders



4. Click on the EH&S folder and navigate to the folder for business area requesting the work.



**Contract EH&S Plan Formatting Requirements**

The Contract EH&S Plan must be scope specific and must follow the format of Section 3 of the EH&S Requirements for Mode 1 Contractor document. The first Section of the Contract EH&S Plan should be 3.1 Scope of Work followed by Sub-section 3.1.1.

Tip: Cross reference the consequence ranking indicated in the scope specific Hazard Identification Checklist with the table on page 7 of the EH&S Requirements for Mode 1 Contractor to understand the requirements that must be addressed in your Contract EH&S Plan.

Scopes of work with C1-C4 consequence ranking should include the five highlighted sections:

| Section # | Contract EH&S Requirements | C1-C4    |
|-----------|----------------------------|----------|
| 1.1       | Scope of Work              | Required |
| 1.2       | Health & Safety Management | Required |
| 1.3       | Environmental Management   | Required |



|     |                           |              |
|-----|---------------------------|--------------|
| 1.4 | Learning and Competency   | Required     |
| 1.5 | Subcontractor Management  | Required     |
| 1.6 | Leadership Accountability | Not Required |
| 1.7 | Audits and Assessments    | Not Required |

Scopes of Work with C5-C6 consequence ranking should include the following seven highlighted sections:

| Section # | Contract EH&S Requirements | C5-C6    |
|-----------|----------------------------|----------|
| 1.1       | Scope of Work              | Required |
| 1.2       | Health & Safety Management | Required |
| 1.3       | Environmental Management   | Required |
| 1.4       | Learning and Competency    | Required |
| 1.5       | Subcontractor Management   | Required |
| 1.6       | Leadership Accountability  | Required |
| 1.7       | Audits and Assessments     | Required |

Regardless of the consequence ranking, Suncor expects the Contractor to have processes and systems in place to meet all regulatory, environment, health and safety legal requirements.

**Guidance to develop the Contract EH&S Plan Sections**

**A3.1 Scope of Work**

Use the SOW document provided by Suncor to provide details of the work covered by this Contract EH&S Plan.

Tip: This should include, at a minimum an overview of the work to be done, estimated size of the workforce, location and estimated duration.

**A3.2 Health & Safety Management**

A3.2.1 Hazard Assessment

Review the Hazard Identification Checklist provided to you by Suncor; identify additional health and safety hazards as required.

**SUNCOR** Hazard Identification Checklist

**Instructions:**  
 - Checklist to be completed by Requestor. Consult with EH&S as required.  
 - Identified hazards are directly applicable to the Scope of Work (SOW).  
 - General area & site hazards are to be addressed by the Business Unit orientation.  
 - Hazards identified require defined controls to be included in finalized Contract EH&S plan.  
 - Single CS - CE hazard equates to an Overall Worst Credible Consequence of CS - CE.  
 - Assigned Worst Credible Consequence can be adjusted in consultation with EH&S.

Overall Worst Credible Consequence (WCC) to determine Contractor EH&S Plan Requirements  
 □ Consequence C1 - C4  
 ■ Consequence C5 - C6

Scope of Work Description

Requestor: \_\_\_\_\_ Health & Safety Representative: \_\_\_\_\_  
 Contract Owner: \_\_\_\_\_ Date: \_\_\_\_\_

| Type    | WCC | Health and Safety Hazard Description   | SOW Hazard               |                          | WCC     | Health and Safety Hazard Description                      | SOW Hazard               |                          |
|---------|-----|--|--------------------------|--------------------------|---------|---|--------------------------|--------------------------|
|         |     |  | YES                      | NO                       |         |   | YES                      | NO                       |
| C1 - C4 |     | Animal encounters                      | <input type="checkbox"/> | <input type="checkbox"/> | C5 - C6 | Working in proximity to bodies of water                   | <input type="checkbox"/> | <input type="checkbox"/> |
| C3 - C4 |     | Obstacles and Barriers                 | <input type="checkbox"/> | <input type="checkbox"/> | C3 - C4 | Use of hand tools   | <input type="checkbox"/> | <input type="checkbox"/> |
| C3 - C4 |     | Rotating Equipment                     | <input type="checkbox"/> | <input type="checkbox"/> | C3 - C4 | Use of knives or sharp edges                              | <input type="checkbox"/> | <input type="checkbox"/> |
| C3 - C4 |     | Working with ladders (< 5 ft or 1.5 m) | <input type="checkbox"/> | <input type="checkbox"/> | C3 - C4 | Manual materials handling / lifting (> 30 lbs or 22.6 kg) | <input type="checkbox"/> | <input type="checkbox"/> |

Tip: Applicable hazards indicated in the Hazard Identification Checklist are those directly related to the scope of work.

For example, if a Contractor is working on a pump the hazards directly related to that scope of work must be identified. In this case “Use of hand tools” would be one of the hazards selected. If the pump is part of a system that circulates water and workers will interact with water under pressure then “water, steam and condensate under pressure” would be identified.

If there is a large propane tank On-site that is in no way related to the scope of work this would not be identified on the Hazard Identification Checklist as it is a general area / site hazard. Contractor Personnel are made aware of the tanks existence through the area orientation as well as discussions on general area / site hazards with their supervisor. In the event of an emergency, related to the tank, the appropriate area emergency management procedures must be followed.

A3.2.2 Provide a scope specific assessment that expands on the health and safety hazards (as defined in the Hazard Identification Checklist) and includes:



- i. the tasks to be performed;
- ii. identification of the health and safety hazards;
- iii. risks prior to the application of controls;
- iv. identification of controls to mitigate the health and safety hazards; and
- v. residual risk after the control has been applied.

Tip: Consider using the below sample (based on the Alberta Government Hazard Assessment and Control Handbook) as guidance to meet the requirements of Section 3.2.2. Ensure a copy of your risk matrix is provided in your Contract EH&S Plan.

Your assessment should also indicate leadership accountability to mitigate high severity hazards and ensure your hazard controls are integrated with the execution of work (e.g., align controls with toolbox talks, field level hazard assessment process, training and procedures)





| <p><b>Inside the Regional Municipality of Wood Buffalo</b></p>                    | <p><b>Outside Regional Municipality of Wood Buffalo</b></p>                        |
|---|--|
|  |  |

**A3.2.4 Fit for duty**

Indicate how the health and welfare of the Contractor Personnel will be ensured, including:

- i. indicating the service provider(s) for post-incident and reasonable cause alcohol and drug testing;
- ii. providing an understanding of what controls are in place for prescription medication in the workplace;
- iii. determining health and wellness requirements for Contractor Personnel who are employed in a hazardous occupation or perform work at a hazardous site, where worker occupational health is monitored related to exposures in the work environment. Provide a summary of your Risk Based Health Assessment Program in accordance with the applicable OHS legislation, including how Contractor Personnel's ability to perform job requirements is confirmed; and
- iv. requirements to ensure PPE, such as respirators or fall protection, are properly fit tested, used and maintained.

**A3.3 Environmental Management**

- A3.3.1 Review the Hazard Identification Checklist provided by Suncor to identify any additional environmental factors or hazards relevant to the SOW.
- A3.3.2 Identify all controls required to manage the environmental hazards, including any Suncor identified environmental controls.

Tip: When developing controls for identified environmental hazards consider the following as guidance for the level of detail expected within this section:

| Hazard                        | Source    | Prevention Measures   |
|-------------------------------|-----------|---|
| Surface water run-off impacts | Equipment | <ul style="list-style-type: none"> <li>•Keep all equipment clean of drips and stains</li> <li>•Equipment should be serviced according to the manufacturer's recommendations</li> <li>•Use appropriate spill prevention controls when fueling</li> </ul> |

Note: This is an example only. Your responses should reflect how your process addresses each of these areas.

### A3.4 Learning and Competence Requirements

A3.4.1 Provide a training matrix that includes the Suncor mandatory training as well as scope specific training requirements.

Tip: Suncor will provide a list of Suncor mandatory training to include within your matrix, you will indicate any additional scope specific training requirements to address the hazards associated with the SOW.

When developing training controls consider the following as guidance for the level of detail expected for 3.4.1:

| Mandatory Training for Contractor                                      | Description  | Duration | Details   | Provider          | Supervisor | Employee | EHS Personal | Provided by Suncor | Provided by Contractor | Comments   |
|--|--|----------|---|-------------------|------------|----------|--------------|--------------------|------------------------|--|
| Pre- Hands on Work- Mandatory Training (Required as per scope of Work) |  |          |   |                   |            |          |              |                    |                        |  |
| H2S Alive  | An overview of H2S properties, hazards and risks of H2S exposure, and emergency and rescue procedures. | N/A      | <a href="http://www.enform.ca/">http://www.enform.ca/</a> | Enform or Similar | X          | X        | X            |                    | X                      | Required as per SOW, Mandatory training to be provided by Contractor |

Note: This is an example only your training matrix should depict your training program.

A3.4.2 Indicate how competency of Contractor Personnel to execute the SOW will be ensured.

Tip: Explain your process for deeming workers and supervisors competent. This may include training on the OHS Act, Regulation and Code, followed by supervisory verification, and certification. Provide any supporting documentation such as a blank copy of your competency assessment forms, including forms related to competency for equipment operation.

### A3.5 Subcontractor management

Tip: If subcontractors will not be engaged for this scope of work, you do not need to complete this section. Write “not applicable” and delete the requirements in this section

A3.5.1 If using subcontractors to perform any portion of the SOW:

- i. provide the names of the subcontractor(s);
- ii. define the specific scope of work the subcontractor(s) will be executing; and
- iii. describe how subcontractor(s) will be held accountable to meet the EH&S requirements within your approved Contract EH&S Plan.

Tip: Consider the following draft topics for subcontractor accountability:

- Pre-qualification and selection
- Competency to perform the work
- Hazard identification and Controls
- Mobilization
- Performance management

Note: This is not an exhaustive list. Detail your process for holding subcontractors accountable.

### A3.6 Leadership Accountability

*This section is only required for C5-C6 consequence scopes of work, it is optional for C1-C4 scopes of work.*

A3.6.1 Provide a summary of the expectations and frequency your leaders will engage in the following:

- i. safety discussions (for example; toolbox talks, safety meetings);
- ii. investigation of incidents;
- iii. workplace observation systems; and
- iv. work site EH&S inspections and safety steering committees.

Tip: A table may be the best way to depict management accountabilities for 3.6.1 item “i” an example of the level of detail required can be seen in the following:

|                    | Toolbox Talks | Safety Meetings | Observations | Inspections |
|--------------------|---------------|-----------------|--------------|-------------|
| General Manager    | Quarterly     | Quarterly       | Quarterly    | Quarterly   |
| Operations Manager | Weekly        | Monthly         | Monthly      | Monthly     |

Typically in a Mode 1 Contractor situation Suncor will manage day to day work activities; however the Contractor is still obligated to be On-site and ensure their OHS accountabilities are being met.

Note: This is an example only. Your responses should reflect management accountabilities within your safety management system. There may be additional roles i.e. EH&S that should be included and will be heavily dependent on the SOW, including its work force size, risk and duration.

Tip: Provide a written description of management accountabilities for 3.6.1 items (ii) through (iv) an example of the level of detail required can be seen in the following:

“Management is accountable for one workplace inspection per month. Supervision is expected to participate in one workplace Inspection per shift cycle, Lead Hands are accountable for four per shift cycle and EH&S is expected to conduct one workplace inspection per Work Site per shift cycle.”

Note: This is an example only. Your responses should reflect management accountabilities within your safety management system. There may be additional roles i.e. EH&S that should be included.

### A3.7 Audits and Assessments

*This section is only required for C5-C6 consequence scopes of work, it is optional for C1-C4 scopes of work.*

A3.7.1 Provide a summary of the audit and assessment activities for monitoring EH&S performance against your Contract EH&S Plan that includes:

- i. a schedule or frequency of self-assessments and/or audits; and
- ii. a process for tracking and managing corrective actions.

Tip: Provide a written description or table for 3.7.1(i). An example of the level of detail required is shown below:

- The Operations Manager is responsible for the implementation of the audit program.
- Compliance audits are performed monthly by supervisors with the assistance of the EH&S department.
- Contractor Personnel are responsible for participating in and contributing to the audit program.

Note: This is an example only. Your responses should reflect your audits and corrective action process.



Tip: Provide a written description for 3.7.1(ii). An example of the level of detail required is shown below:

Upon completion of audit, results and recommendations are reviewed with management for further evaluation, and discussed with employees. An action plan is developed to close gaps and a verification plan is put in place to ensure the action plan is effective. Action plans are developed within our \_\_\_\_\_ management system, which tracks and prompts closure of action items.

Note: This is an example only. Your responses should reflect your and corrective action process.