Corrective Actions Standard
Summary of Changes

This Summary shows:

- The location of each change within the document
- All changes to this document since it was last approved and published

<table>
<thead>
<tr>
<th>Location of Change</th>
<th>Summary of Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Entire Document</td>
<td>This is the initial revision of the document.</td>
</tr>
</tbody>
</table>

⚠️ Requirements changed in the new revision will be identified with a revision triangle beside it.
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1 About this Standard

Purpose
The purpose of this Standard is to provide the requirements for managing Corrective Actions at Suncor.

Scope
The scope of this Standard includes:

a) Outlining Suncor’s processes for the management of Corrective Actions.

b) Providing detailed requirements to:
   - Initiate a Corrective Action
   - Assign and Communicate Responsibilities, Timelines and Resources
   - Execute Tasks and Monitor Completion of a Corrective Action
   - Close a Corrective Action

c) Providing requirements to enable Suncor business units (BU) and functions (FN) in developing local Corrective Actions processes and procedures.

For the purpose of this standard the term Corrective Action includes both Corrective and Preventive Actions, unless otherwise noted.

Target Audience
The target audience of this standard is Suncor personnel responsible or accountable for managing Corrective Actions and supporting tasks.

This Standard applies to Suncor Energy Inc. and subsidiaries over which Suncor has operational control (collectively “Suncor”, “the company” or “enterprise-wide”).

As used in this document, Suncor personnel include directors, officers, employees, contractors, consultants and agents of Suncor.

Conformance Expectations
Conformance to all new or updated requirements in this standard is required within five years of the approval date.

In addition to what is provided for in this Standard, Suncor personnel must comply with the requirements of applicable laws and regulations. If a deviation to this standard is required the GDF deviation process must be followed.

Introduction
A Corrective Action is intended to eliminate the occurrence or reoccurrence of an undesirable situation.
2 Requirements

2.1 General Requirements

Business Unit or Function Tools

The following outline the Business Unit or Function requirements for tools to document Corrective Actions:

2.1.1 Business Units and Functions shall use enterprise-wide tools to document Corrective Actions.

2.2 Sources of Corrective Actions

Sources of Corrective Actions

The following outlines the sources of Corrective Actions:

2.2.1 At a minimum, the following sources shall use the process outlined in this standard for managing Corrective Actions:

- Incident Management
- Risk Management
- Audits & Assessments

Note: Corrective Actions originating from other sources may use the process and tools outlined in this standard.

2.3 Initiate a Corrective Action

Initiate a Corrective Action

The following criteria apply when a corrective action is initiated:

2.3.1 The Corrective Action Initiator shall create a Corrective Action in the applicable enterprise-wide tool.

Note: A Corrective Action may be created by any director, officer, employee, contractor, consultant or agent of Suncor.
2.3.2  The Corrective Action Initiator shall capture the scope of the Corrective Action using the SMART format (Specific, Measurable, Achievable, Relevant, and Time Bound) as follows:

- **Specifically** state the intended action, why it is needed, and what it should accomplish
- Define successful completion in **measurable** terms
- Be practical, feasible, and **achievable**
- Be compatible and **relevant** with other organizational objectives such as protecting people, equipment, community, environment, and profitability
- Identify a **timeframe** for implementation

2.3.3  The scope of the Corrective Action shall ensure that the residual risk related to (or associated with) the undesirable situation, be reduced to an acceptable level.

2.3.4  The Corrective Action risk level shall be equivalent to the Corrective Action Source Risk Level.

**Note:** The risk level assigned to the Corrective Action may be reduced by the Corrective Action Owner per the table in step 2.4.2.

2.3.5  The Corrective Action Initiator shall assign a timeline for completion of the Corrective Action.

**Note:** An Interim Action may be used as a risk reduction measure until a Corrective Action can be completed.

2.3.6  The Corrective Action Initiator shall assign a Corrective Action Owner.

2.3.7  The Corrective Action Owner shall be, at a minimum, equivalent to the Risk Owner based on the source risk level and in alignment with the Risk Accountability, Responsibility and Ownership Table (2.1.16) of the Risk Management Standard.
### 2.4 Ownership

#### Ownership of a Corrective Action

The following criteria outline the requirements for ownership of a Corrective Action:

2.4.1 The Corrective Action Owner shall review the risk level to confirm ownership of the Corrective Action.

2.4.2 The Corrective Action Owner shall review the scope to determine if the Corrective Action shall be implemented.

<table>
<thead>
<tr>
<th>If</th>
<th>Then</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corrective Action scope and ownership are accepted</td>
<td>Corrective Action Owner shall:</td>
</tr>
<tr>
<td></td>
<td>• Notify the Corrective Action Initiator of acceptance</td>
</tr>
<tr>
<td></td>
<td>• Execute Corrective Action</td>
</tr>
<tr>
<td>Corrective Action scope requires more detail</td>
<td>Corrective Action Owner shall:</td>
</tr>
<tr>
<td></td>
<td>• Notify the Corrective Action Initiator and request more information for the Corrective Action</td>
</tr>
<tr>
<td>Corrective Action scope is to be modified</td>
<td>Corrective Action Owner shall:</td>
</tr>
<tr>
<td></td>
<td>• Notify the Corrective Action Initiator and Responsible Person</td>
</tr>
<tr>
<td></td>
<td>• Provide details and justification for modification of the Corrective Action</td>
</tr>
<tr>
<td>Ownership is incorrectly assigned</td>
<td>Corrective Action Owner shall:</td>
</tr>
<tr>
<td></td>
<td>• Transfer ownership of the Corrective Action</td>
</tr>
<tr>
<td></td>
<td>• Notify the new Corrective Action Owner of the assignment</td>
</tr>
<tr>
<td></td>
<td>• Ensure the Corrective Action Owner accepts ownership</td>
</tr>
<tr>
<td>Corrective Action risk level is reduced</td>
<td>Corrective Action Owner shall:</td>
</tr>
<tr>
<td></td>
<td>• Update the Corrective Action risk level</td>
</tr>
<tr>
<td></td>
<td>• Provide justification for the risk level reduction</td>
</tr>
<tr>
<td></td>
<td>• Notify the Corrective Action Responsible Person</td>
</tr>
</tbody>
</table>
Corrective Action is to be cancelled

Corrective Action Owner shall:
- Notify the Corrective Action Initiator and Responsible Person (Risk Level III and above)
- Formally document the decision to not perform the Corrective Action
- Establish an appropriate monitoring regime for the residual risk

2.4.3 The Responsible Person shall be, at a minimum, the equivalent of the Responsible Person based on the source risk level and in alignment with the Risk Accountability, Responsibility, Ownership Table (2.1.16) of the Risk Management Standard.

Note: Where the Corrective Action Owner meets the minimum level required for the Responsible Person, they may act as both the Corrective Action Owner and Responsible Person.

2.5 **Execution of a Corrective Action**

<table>
<thead>
<tr>
<th>Execution of a Corrective Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>The following criteria apply when executing a Corrective Action:</td>
</tr>
</tbody>
</table>

2.5.1 The Corrective Action Owner shall assign resources and communicate responsibilities to support execution of the Corrective Action.

2.5.2 The Corrective Action Owner shall be responsible for completion of the Corrective Action by the target completion date.

2.5.3 Where the Corrective Action timeline is extended and the risk is Level III or higher, the Responsible Person shall be notified.
## 2.6 Closing a Corrective Action

The following criteria apply when closing a Corrective Action:

### 2.6.1 The Corrective Action Owner shall verify that all work is:

- Completed as outlined in the scope
- Documented in the applicable enterprise-wide tool

### 2.6.2 The Corrective Action Owner shall ensure effectiveness of the Corrective Action and verify that:

- Risk related to (or associated with) the undesirable situation has been mitigated, reduced, or eliminated as intended
- Formally document any outstanding residual risk
- An appropriate monitoring regime for the residual risk is in place
- The Corrective Action is sustainable
- No new risks have been introduced

### 2.6.3 The Corrective Action Owner shall take the following actions to close the Corrective Action:

<table>
<thead>
<tr>
<th>If</th>
<th>Then</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implementation and effectiveness of Corrective Action has been verified</td>
<td>Mark the Corrective Action as closed</td>
</tr>
<tr>
<td>Effectiveness of Corrective Action cannot be verified immediately</td>
<td>Schedule and assign a verification of effectiveness. Once scheduled, mark the Corrective Action as closed.</td>
</tr>
</tbody>
</table>
2.7 Roles and Responsibilities

Corrective Action Initiator
The Corrective Action Initiator shall be accountable for:

2.7.1 Ensuring the scope, source risk level, owner and timeline of the Corrective Action are identified and/or captured in the applicable enterprise-wide tool.

Corrective Action Owner
The Corrective Action Owner shall be accountable for:

2.7.2 Reviewing the Corrective Action scope, source risk level and timeline
2.7.3 Verifying ownership of the Corrective Action
2.7.4 Assigning resources and communicating responsibilities to support execution of the Corrective Action
2.7.5 Monitoring the execution and completion of the Corrective Action
2.7.6 Verifying effectiveness of the Corrective Action
2.7.7 Closing the Corrective Action

Responsible Person
The Responsible Person shall be accountable for:

2.7.8 Overseeing scope development, timeline extensions, and closure for Risk Level I, II, and III Corrective Actions.

2.8 Measurements and Verification

Metrics
The following criteria outline the metrics that will be tracked for this standard:

2.8.1 Corrective Actions are completed by the target completion date.

Verification
The following criteria outline how the requirements of this standard will be verified:

2.8.2 The Business Units shall report on:
   - Overdue and extended Corrective Actions.

2.8.3 The metrics shall be reported at a minimum of once a year.
## 3 Terms and Definitions

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corrective Action</td>
<td>Action to eliminate the cause of a detected nonconformity or other undesirable situation. There may be more than one cause for nonconformity. A Corrective Action is taken to prevent recurrence.</td>
</tr>
<tr>
<td>Corrective Action Source</td>
<td>The undesirable situation the Corrective Action is addressing.</td>
</tr>
<tr>
<td>Interim Action</td>
<td>Interim solution until a permanent control can be put into effect.</td>
</tr>
<tr>
<td>Preventive Action</td>
<td>Action to eliminate the cause of a potential nonconformity or other undesirable potential situation. There may be more than one cause for a potential nonconformity. A Preventive Action is taken to prevent occurrence.</td>
</tr>
<tr>
<td>Residual Risk</td>
<td>The risk with controls in place. It may refer to current residual risk or future residual risk.</td>
</tr>
<tr>
<td>Source Risk Level</td>
<td>The current residual risk level of the Corrective Action source.</td>
</tr>
</tbody>
</table>
4 References

4.1 Essential Documents

The list below outlines the documents that need to be read with this document for full understanding:

- Operational Excellence Management System (OEMS)

4.2 Referenced Documents

The documents referenced within this standard are listed below:

- SUN-00154 Risk Management Standard
- GDF Deviation Request Form
The following individuals have approved and signed this document.

UserName: Michael Agnew (magnew)
Title:  VP EH&S
Date: Tuesday, 04 August 2015, 01:59 PM  Mountain Time
Meaning: I approve this document

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