Contractor Health and Safety Program Requirements

Content Owner	Group Lead, Health & Safety Solutions		
Custodian	Contractor Safety Management		
H&S Discipline	Contractor Safety Management		
Program	Contractor Safety Management Program		
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			Requester	Reviewer	Owner
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Version 2.0	Title change to better reflect the Contractor verification program which is used to verify these requirements. Minor editoral & clarification items.	Oct 30, 2015	B. Arbo	S. Rolseth	H&S Solutions
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1.0 Purpose

The primary purpose of the *Contractor Health and Safety Program Requirements* document is to provide guidance regarding Cenovus' minimum Health and Safety requirements for work at Cenovus sites. This will help ensure that contractors bidding on Cenovus onsite work are aware of Cenovus' health and safety program requirements prior to signing a Cenovus agreement and commencing work.

The secondary purpose of this document is to support communication and ensure complete transparency of contractor H&S requirements which will be evaluated and verified by Cenovus throughout the supplier lifecycle, with the intent of continuous improvement and consistent contractor H&S performance management.

The requirements stated in this document have been ranked according to the Cenovus Risk Matrix based on the risk for which the program is intended to mitigate.

Cenovus jobsites and functions may have additional site/scope specific H&S requirements.

2.0 Scope

As owner of the work, Cenovus requires all our contractors, and their subcontractors to support our health and safety commitments, goals and approaches. Contractors are to develop and implement such policies, programs, procedures, practices, guidelines, and other documentation to effectively meet or exceed Cenovus' H&S program requirements.

Contractors will be required to complete the Qualification Questionnaire(QQ) inside of their Cenovus- ISNetworld (ISN) profile, committing to these Cenovus program requirements. Based on the level of risk, size of capital project, or ISN exemption requests, contractors may be required to develop an Occupational Health and Safety Execution Plan (OHSEP), or Risk Mitigation Plan detailing compliance with Cenovus' H&S requirements. For guidance developing an OHSEP see: IOGP H&SE Management.

Contractors are required to perform a gap analysis between their own H&S programs and the Cenovus' H&S program requirements stated in this document. This will help Contractors demonstrate to Cenovus that their programs adequately address their H&S risks, and contain enough information to comply with Cenovus' program requirements.

3.0 Contractor's H&S Qualification Questionnaire in ISNetworld

At various stages throughout the supplier lifecycle, contractors will be evaluated and verified against these requirements, the contractor's ISN Qualification Questionnaire(QQ) answers, as well their RAVS safety programs in ISN. Please ensure that your answers and comments in the following gap analysis are aligned with your *ISN QQ answers* and *RAVS Safety Programs* as provided in ISNetworld.

Where a contractor does not perform the type of work for which a program is intended, a hazard awareness program may be substituted. Hazard awareness programs or materials may be part of a risk assessment & control program or the contractor's safety orientation.

Please provide a detailed description of all the work types and/or services your company would like to be considered safety qualified by Cenovus to perform (add rows as required). Review your *ISNetworld Work Type selection* to ensure alignment with the services listed here.

Please complete the following gap analysys providing YES or NO answers to each question.

Remember that all of these requirements are OHS legislation, WCB Legislation, or Cenovus minimum H&S requirements. Consider that just because your workers do not perform work inside of confined spaces does not mean that they are not exposed to the hazards related to confined spaces. You may need to implement a confined space hazard awareness program instructing what confined spaces are, and that your workers may not enter them.

Program requirements for which hazard awareness programs or materials may be acceptable have been identified in the table on the following pages.

Note: The table below is meant to be used as a high level gap analysis and mirrors the QQ in ISNetworld. Corresponding ISNetworld RAVS safety programs are listed below the Cenovus program requirements for your reference. Alberta(AB), Best Practice(BP).

Cenovus's H&S Program Requirement *RAVS safety program equilivant*	**Does your H&S program meet Cenovus requirements**				**Contractor's comments**
	Risk rank	Hazard awareness acceptable	Yes	No	
Example: ***4.0 Sub-contracting***	High	No	*X*		*Please see our subcontractor management program in ISN RAVS.* *Completed prequal and orientation records are available upon request.* *We provide job supervision of all our subcontractors*

Cenovus's H&S Program Requirement *RAVS safety program equilivant*	Does your H&S program meet Cenovus requirements				Contractor's comments
	Risk rank	Hazard awareness acceptable	Yes	No	
4.0 **Subcontracting** *Subcontractor Management Plan (BP)*	High	Yes			
5.0 **ISNetworld subscription**	High	No			
6.0 **Contractor's H&S program & performance verification** *General H&S Requirements (AB)*	High	No			
7.0 **Cenovus policies & acknowledgements**	Low	No			
8.0 **Regulatory disclaimer and industry standards**	Med	No			
9.0 **Risk management & hazard assessment program** *Hazard Identification Risk Assesment (BP)*	High	No			
10.0 **Contractor health and safety management commitment**	Med	No			
11.1 **Alcohol and drug policy & program** *Alcohol & Drugs (BP)*	Extr	No			
11.2 **Provision of emergency medical services** First Aid (AB)	Ext	No			
11.3 **Infectious diseases** *Chemical & Biological Hazards (AB)*	Low	No			
11.4 **Medical Fitness for work** *Fit for Duty (BP)*	Ext	No			
11.5 **Manual material handling program** *Ergonomics/Manual Material Handling (AB)*	Med	No			
11.6 **Disability management program** *Safe Return to Work(BP)*	High	No			
11.7 **Fatigue Management** *Fatigue Management (BP)*	High	No			
11.8 **Occupational hygiene program** *Chemical & Biological Hazards (AB)*	High	No			

11.9 **Hazardous materials management program** *Chemical & Biological Hazards (AB)*	High	No			
11.10 **Asbestos Program** *Asbestos (AB)/ Awareness-Asbestos*	High	Yes			
11.11 **Hydrogen Sulfide program** *Hydrogen Sulfide (AB)*	Ext	Yes			
11.12 **Benzene program** *Chemical & Biological Hazards (AB)*	High	Yes			
11.13 **Respiratory protection program** *Respiratory Protection (AB)*	High	Yes			
11.14 **Hearing conservation program** *Noise (AB)*	High	No			
11.15 **Thermal exposure & stress prevention program**	Med	Yes			
12.1 Adherence to Cenovus **Safety commitments** and **Life-saving rules** *Progresive Disipline (BP)*	Ext	No			
12.2 **Firearms and weapons** *Workplace Violence/Harrassment (AB)*	High	Yes			
12.3 **Smoking** *Fire & Explosion Hazards (AB)*	High	No			
12.4 **Competency & health and safety training program** *Job Competency(BP)*	High	No			
12.5 **New, young, short service workers program** *Short Service & New Employees(BP)*	High	No			
12.6 **High hazard worksite health and safety staffing** *Job Competency (BP)*	High	No			
12.7 **Safe work procedures** *Hazard Identification & Risk Assesment (BP)*	Ext	No			
12.8 **Safe work permitting system**	Ext	No			
12.9 **Workplace & equipment inspection program** *General H&S Requirements (AB)*	Ext	No			

12.10 **Health and Safety communications program** *Hazard Identification & Risk Assesment*	High	No			
12.11 **Health and Safety reporting**	High	No			
12.12 **Health and safety management of change program** *Hazard Identification & Risk Assesment*	High	No			
12.13 **Behaviour observation program** *Behaviour Based Safety/Job Observation*	Med	No			
12.14 **Hazard ID & near miss reporting program**	Med	No			
12.15 **Incident management program** *Incident Reporting & Investigation (BP)*	Ext	No			
12.16 **Emergency management & response plan(s)** *Emergency Response Plan (BP)*	Ext	No			
12.17 **Personal protective equipment** *Personal Protective Equipment (AB)*	High	No			
12.18 **Machine, equipment, hand tool, & knife, hazard control program(s)** *Hand & Power Tools (BP)*	High	No			
12.19 **Scaffold inspection program** *Temporary Work Platforms (AB)*	High	Yes			
12.20 **Portable ladder safety program** *Ladder Safety (BP)*	High	Yes			
12.21 **Safety barrier erection and maintenance program**	High	Yes			
12.22 **Worksite housekeeping program** *General H&S Requirements (AB)*	Med	No			
12.23 **Preventative maintenance program** *Preventative Maintenace (BP)*	High	No			
12.24 **Rigging, lifting & hoisting equipment program** *Rigging (AB)*	Ext	Yes			

12.25 **Cranes and critical lifts program** *Cranes, Hoists, & Lift Trucks (AB)*	Ext	Yes			
12.26 **Fall protection program** *Fall Protection (BP) / Awareness- FP*	Ext	Yes			
12.27 **Fire & explosion prevention program** *Flammable & Combustible Substances (BP)*	Ext	No			
12.28 **Welding, cutting & grinding safety program** *Hot Work (BP)*	Ext	Yes			
12.29 **Ground disturbance program** *Ground Disturbance (BP) / Awareness- GD*	Ext	Yes			
12.30 **Adherence to Cenovus Electrical Work Practice (EWP)** *Electrical Safety (BP)*	Ext	Yes			
12.31 **Working around overhead utilities program** *Working Near High Voltage Electricity (BP)*	Ext	Yes			
12.32 **Energy isolation program** *Lock out Tag out (LOTO) (BP)*	Ext	No			
12.33 **Confined space entry program** *Confined Space (AB)*	Ext	Yes			
12.34 **Working alone program** *Working Alone (AB)*	High	No			
12.35 **Winter work program**	Med	No			
12.36 **Workplace violence & harassment prevention** *Workplace violence/harassment (AB)*	Med	No			
12.37 **Driving / vehicle safety program** *Vehicle Safety Policy (BP)*	Ext	No			
12.38 **Commercial Vehicles Safety** *Commercial Vehicle Operations (BP)*	High	Yes			

4.0 Subcontracting

High Risk

Contractors who have Cenovus master service/commercial agreements, contracts, and purchase orders in place are contractually responsible for managing any subcontractor that they choose to engage. This means that the named recipient of a contract to provide services to Cenovus will be held accountable to manage their subcontractors as per the contractor's own, Cenovus pre-approved, health and safety program(s). Contractors must ensure that they have suitable subcontractor management programs and have documentation to demonstrate that they have used their program whenever bringing subcontractors to Cenovus sites.

- Contractors are responsible to cascade these Cenovus health and safety program requirements to any and all of their subcontractors
- Contractors are responsible for all incidents, inspections, and leading/lagging indicators accrued by their subcontractors
- Contractors will provide a list of subcontractors to be used for the work which they will undertake on Cenovus's sites for review and approval by Cenovus prior to execution of work

For more information on oil and gas industry guidelines regarding contractor management see *Enform's* Contractor Management Systems Guideline

5.0 ISNetworld subscription

High Risk

All contractors are required to be *subscribed* in ISNetworld (ISN) and *connected* to Cenovus. Contractors must maintain a grade C or better with Cenovus to be considered safety qualified to perform the selected work types for Cenovus.

Contractors must maintain their *ISN Cenovus Profile* with the most current Qualification Questionnaire answers, RAVS safety programs, and WCB information (including Primary Industry codes representing the work scope(s) performed for Cenovus).

If a Contractor fails to meet Cenovus's qualification requirements or health and safety performance standards their ISN grade will fall to an unacceptable status (D, F or Restricted Status). At this time, the contractor will be asked to submit a Risk Mitigation Plan to Cenovus that specifies all actions the contractor will take to address the health and safety performance issues.

Cenovus uses the ISNetworld Bulletin Board to communicate health and safety program and training requirements as well as changes to our contractor management processes. Contractors are expected to periodically view the Messages section of ISN and activate email alerts from Cenovus.

6.0 Contractor's H&S program & performance verification

High Risk

Contractors are required to conduct periodic internal audits and inspections of their worksites, equipment, tools, and subcontractors, consistent with their own programs. Records of these audits and inspections will be made available at Cenovus's request.

Cenovus may require contractors to submit their (and their subcontractor's) health and safety program and performance information to support Cenovus' evaluation & verification activities (audits, inspections, verification, etc.).

Contractors are to provide full and diligent support including site access, requested documentation, and availability of personnel for interviews, to Cenovus personnel or third parties operating on Cenovus' behalf to conduct any health and safety evaluation or verification activity.

For more information regarding oil and gas industry guidelines for contractor verification, see *Enform's* Contractor Management Systems Guideline.

7.0 Cenovus policies & acknowledgements

Low Risk

All contractors and their subcontractors are required to acknowledge all Cenovus policies posted on the Cenovus webpage under Contractors > Policies. Ensure that written acknowledgement is available to Cenovus upon request.

8.0 Regulatory disclaimer and industry standards

Medium Risk

Regulatory requirements supersede those of this document, all contractors have the responsibility to know and comply with all applicable laws, regulations, codes, statutes, and any other regulatory requirements, as well as industry standards.

Contractor's safety program or management system will define a process for identifying and complying with all applicable health and safety regulations which includes:

- OH&S Acts, Regulations, and Codes (communicate, and make available to workers)
- Processes for the acknowledgement of, and compliance with, the applicable health and safety legislative and regulatory requirements associated with the work (including required safeguards, approvals and/or licenses, training of personnel, etc.)
- Description, implementation and maintenance of processes to support the legislated workplace health and safety rights of employees
- Notification to Cenovus (and update in ISNetworld) of any OH&S orders or administrative penalties and citations issued prior to, or in the calendar year leading up to commencement of work with Cenovus

For more information regarding applicable OH&S legislation, please refer to:

- *Government of Alberta's* Occupational Health and Safety Act, Regulation, Code, and Code Explanation Guide
- *Government of Saskatchewan's* The Occupational Health and Safety Regulations, 1996

9.0 Risk management & hazard assessment program

High Risk

All contractor's risk management and hazard assessment programs must be anchored by a risk register, project hazard/risk assessment, or inventory of critical tasks. These documents must identify potential occupational health hazards, safety hazards, and workplace emergencies which could pose significant risk to worker injury, worker health, the public, or the environment.

Contractors will have a risk management program which incorporates structured processes for both formal risk assessment (JHA) and site specific hazard assessment (FLHA), including at a minimum:

- Methods for identifying occupational health, safety, and emergency hazards
- Methods for assessing and determining risk level
- Rules regarding prioritizing higher risk scenarios
- Methods for bypass management of safety critical equipment (drilling, mobile equipment, and power tool safeguards may NEVER be bypassed)
- Methods for mitigating risks to a per-determined acceptable level, including:
    - rules regarding the application of the hierarchy of controls
    - instruction regarding the development of risk mitigation/control plans
    - systems for monitoring risk mitigation plans/controls for effectiveness
    - the effective use of basic health and safety administrative processes and procedures (e.g.: safe work permits, safe work practices, standard operating procedures, codes of practice, etc.) to control risks related to the work
    - the use of standard risk/hazard communication tools such as safety meetings, shift toolbox, concurrent work, management of change, and coordination meetings
- Worker training on risk management program and hazard assessment and control.

For more information regarding Risk Assessment programs see:

- *WorkSafe Alberta*'s Hazard Assessment and Control: a handbook for Alberta employers and workers
- *Enform's* Introduction to Safety Management Systems: Program Development Guideline, Practice#2 – Hazard Identification and Risk Assessment
- *Enform's* Project Site Hazard Assessment

Obtain authorization before overriding or disabling safety critical equipment is one of Cenovus' Life Saving Rules

10.0 Contractor health and safety management commitment

Medium Risk

Health and safety are core values at Cenovus and apply to everyone involved directly and indirectly in our activities. As such, it is an expectation that our contractor's management is equally committed to health and safety and will demonstrate that commitment by ensuring the following:

- Adequate resources are allocated to drive health and safety performance excellence
- Management sets clear direction and expectations through health and safety policies
- Management establishes, monitors compliance with, and enforces health and safety responsibilities for every level of their organization including themselves
- Management engages and communicates with workers regarding health and safety performance standards and expectations by:
    - being knowledgeable of the company health and safety management system and programs
    - demonstrating leadership by setting and achieving personal and companywide health and safety performance objectives
    - visiting field operations and conducting safety tours, inspections, safety meetings and campaigns
    - monitoring completion of health and safety related corrective actions and continuous improvement initiatives

For more information regarding development of a Health and Safety Management Policy see *Enform's* Introduction to Safety Management Systems: Program Development Guideline, Practice#2 – Hazard Identification and Risk Assessment

11.0 Occupational health management requirements

Contractor's health and safety program shall include the establishment and identification of a Health Program Point-of-Contact for work at Cenovus worksites.

The primary elements that need to be addressed in the health and safety program include:

- Alcohol and drug workplace impairment prevention
- Provision of emergency medical services
- Medical fitness for work:
    - fitness for work medical examination standard
    - fatigue management
- Occupational hygiene
- Disability management- safe return to work

11.1 Alcohol and drug policy & program

Extreme Risk

Cenovus is committed to protecting the health and safety of all individuals affected by our activities, as well as the communities in which we live and operate. We recognize that the use of alcohol and drugs can adversely affect job performance, the work environment and the safety of our employees, contractors and the general public.

Cenovus contractors are expected to develop and enforce Alcohol and Drug Policies and Practices (A&D program) that are consistent with the Cenovus A&D Policy and its related practices.

Contractors shall establish, implement and maintain an A&D Program to manage worksite impairment, compliant with applicable laws and Cenovus requirements including:

- Specification of safety sensitive workers requiring inclusion in the A&D program
- Specific requirements for pre-assignment A&D testing
    - Cenovus expects any contractor who is assigned to safety-sensitive position to successfully complete a pre-assignment drug test yielding a fit for work result within 60 days prior to commencing services for Cenovus or being on Cenovus premises
    - contractor personnel who have completed a pre-assignment drug test as set out in the above paragraph and have remained continuously employed with or retained by the contractor company without break are exempt from the 60-day timeframe
- Specific requirements for post-incident A&D testing
- Specific requirements for reasonable cause A&D testing

Cenovus will be provided with a fitness for work notification for any test situation.

Contractors are also expected to have a contract in place with a third party to perform A&D testing. For contactors working in areas where we have clinics with onsite testing facilities (e.g. Christina Lake, Foster Creek, Narrows Lake, and Pelican Lake), it's mandatory to have an agreement in place with Cenovus' preferred testing provider, eScreen Canada ULC.

For more information regarding the development of an A&D program see:

- *Enform's* Alcohol and Drugs Policy Model – Program Development Guideline
- *Cenovus's* Contractor Compliance with the Alcohol & Drug Program

No alcohol or drugs while working or driving is one of Cenovus' Life Saving Rules

11.2 Provision of emergency medical services

Extreme Risk

When incidents occur Cenovus expects that immediate first aid treatment or care is rendered to someone suffering from an injury or illness until complete medical care or treatment can be provided.

Cenovus expects contractors meet or exceed the minimum first aid requirements regulated by the applicable provincial Occupational Health and Safety (OH&S) Code. This means having the necessary equipment, supplies and trained personnel available while conducting work on Cenovus worksites.

For information regarding first aid and emergency medical services see *Enform's* Inter-Provincial Workplace First Aid Requirements Planning Guide.

11.3 Infectious diseases

Low Risk

Contractors are to establish a program for the awareness, recognition, and management of infectious diseases that may be encountered at the worksite.

For more information regarding infectious disease prevention see *WorkSafe Alberta's* Biological Hazards – Bacteria, Viruses and Other Hazards.

11.4 Medical Fitness for work

Extreme Risk

Fitness for work requires that personnel be in a condition to carry out their day-to-day job duties safely and effectively without putting at risk their own health and safety or the health and safety of other staff members, customers, or the public. Cenovus considers personnel unfit for work if injury, illness, physical or psychological health issues, fatigue or the use of alcohol or drugs could result in a reduced ability to perform work safely or effectively.

To initiate a medical fitness for work program, contractors, with assistance from competent medical support, shall either adopt an existing medical examination standard, or shall, again with assistance from competent medical support, develop their own medical examination standard to apply to all their workers and to subcontractors working on Cenovus jobsites.

These medical assessments should include:

- Pre-assignment
- Periodic health
- Fitness-for-work
- Return-to-work
- Other job-specific

The fitness for work program should include both medical and physical assessments that determine whether a worker is capable of performing the duties and responsibilities of a specific job or task under existing working conditions.

For more information regarding the development of a fitness for work program see:

- *WorkSafe Alberta's* Lifting and Handling Loads: Assessing Ergonomic Hazards
- *Treasury Board of Canada's* Occupational Health Evaluation Standard

11.5 Manual material handling program

Medium Risk

Contractor's health and safety program will include a specific program for manual material handling. The program will at a minimum specify the following:

- Hazard assessment specific to manual lifting and handling
- Appropriate equipment to assist with lifting and moving loads
- Instruction or training on proper load handling techniques and mechanical device usage
- Lifting limitations and when to ask for assistance

For more information regarding material handling see *WorkSafe Alberta's* Back care and lifting.

11.6 Disability management program

High Risk

Cenovus contractors are expected to provide workers who are fit-for-work and are in a condition to carry out their day-to-day job duties safely. Workers who are unfit for work due to injury or illness are expected to be managed in accordance to the contractor company's disability management program.

Contractors must have an implemented disability management program that addresses how injured workers will be returned to the same or equivalent position in a timely and safe manner as can reasonably be accommodated by the business.

Contractors shall establish, within their health and safety program, the capability and appropriate policies, procedures and practices to initiate and support injury case management issues, with the goal of returning an injured worker to a meaningful level and type of work as soon as can be achieved without causing harm to the recovering worker or endangering other workers. The injury case management process will require close liaison between the contractor, injured party and competent medical advisors.

Contractors must extend the principles of injury case management to its subcontractor's workers on Cenovus jobsites.

For more information regarding Disability management program development see *Enform's* Return to Work: Program Development Guideline.

11.7 Fatigue Management

High Risk

Contractors are to establish, implement and maintain a fatigue management program that will incorporate:

- Worker awareness, including Cenovus Fatigue Management Awareness module (available at Contractor Connection Orientation and Training Portal).
- Fatigue testing
- Prescribing and tracking hours worked
- Reporting
- Treatment options

For more information regarding Fatigue Management program development see *Enform's* Fatigue Risk Management: A Program Development Guide.

11.8 Occupational hygiene program

High Risk

Contractors shall conduct a comprehensive health and occupational hygiene hazards risk assessment for worksites, and on selected tasks, identify and create an inventory of worksite health hazards, from which both the medical fitness for work and occupational hygiene focus on prevention shall be drawn. An occupational hygiene program shall be established to deal with any high and medium level health hazard risks identified by the project hazard/risk assessment.

For worksites in which contractors and subcontractors undertake activities on behalf of Cenovus, contractors shall develop and submit to Cenovus (as requested), a site health risk registry and mitigation plan for their workers and subcontractors.

11.9 Hazardous materials management program

High Risk

Contractors shall maintain a hazardous materials management program, meeting the requirements of the Workplace Hazardous Materials Information System (WHMIS).

In addition:

- Contractors shall not use any controlled product without Cenovus's prior express approval
- Contractors shall ensure that before any controlled products (as defined by the Canada Hazardous Products Act) are brought onto a Cenovus work site, contractors must provide a Cenovus representative and email and copy to occupationalhealth@cenovus.com with an attachment of the relevant Safety Data Sheet (SDS) in order to gain approval for its use
- Contractors shall store all controlled products in appropriately labelled containers complete with secondary containment or equivalent, provided by the contractor. Cenovus reserves the right to review material storage and handling of any contractor supplied hazardous materials on a Cenovus site.
- Contractor's health and safety program shall also ensure that a chemical hazard identification/assessment process has been established to identify hazardous materials related risks, provide their workers with the necessary training, appropriate PPE, and observe the appropriate handling requirements for such materials. Should the contractor not have a suitable process, Cenovus can provide a template to be followed.
- Contractors are responsible for ensuring that their subcontractor's workers also comply with the hazardous materials identification, training and management requirements
- Contractors are expected to have Codes of Practice for the following hazardous substances known to be present at Cenovus sites if their work involves the storage, handling, use, or disposal of:
    - asbestos
    - benzene
    - hydrogen sulfide (H2S)
    - lead
    - silica (crystalline)

  For more information regarding the development of a hazardous materials management program see *Enform's* Controlling Chemical Hazards in Oil and Gas Industry: Program Development Guideline.

11.10 Asbestos Program

High Risk

Contractors working at Cenovus worksites where asbestos may be encountered are expected to have their own asbestos program in place. Contractors are responsible for:

- Reporting damaged Asbestos Containing Material (ACM) or missing asbestos warning signage to their Supervisor, and Cenovus Business Representative
- Knowing how ACM is labelled
- Reporting to their Supervisor the accidental release of ACM, and stopping work if necessary
- Contractors who have been contracted to remove ACM must be safety pre-qualified for the specific job scope or work type

For more information regarding Asbestos see WorkSafe Alberta, Asbestos at the Work Site.

11.11 Hydrogen Sulfide program

Extreme Risk

Contractors engaged in any operations where H_2S may be or is present at the work site are expected to have a program to ensure their workers are fully knowledgeable of the correct procedures to follow and will take all reasonable measures to protect themselves and their co-workers from the hazards of H_2S.

Contractors are responsible for:

- Complying with all Cenovus's H_2S Code of Practice, safe work procedures, operating practices, and rules as presented when site work begins
- Having valid H_2S Alive or a general industry H_2S Awareness certification, as appropriate to assigned work duties; and *Cenovus'* H_2S Code of Practice Awareness module
- Being aware of all potential H_2S release points, as identified by Cenovus signage
- Wearing and correctly using the required personal protective and respiratory equipment
- Immediately evacuating a worksite should their personal monitor or the facility's H_2S alarm sound
- Reporting to the Work Site Supervisor and Business Representative any sour spills, incidents, and/or unusual conditions which may occur during the work and stopping the work if necessary

For more information regarding H_2S see *WorkSafe Alberta's* H_2S – The Killer.

11.12 Benzene program

High Risk

Contractors working at Cenovus sites where benzene may be encountered are expected to have their own benzene exposure control program in place. Contractors are responsible to:

- Review any practices and procedures provided to them by Cenovus, including *Cenovus's* Benzene Awareness
- Apply information from practices and procedures as minimum work standards as appropriate to their work situation
- Seek clarification concerning any Cenovus practice or procedure through their immediate Supervisor
- Implement their own benzene exposure control program

For more information regarding Benzene see *WorkSafe Alberta's* Benzene at the Work Site.

11.13 Respiratory protection program

High Risk

When airborne hazards cannot be controlled sufficiently using engineering and administrative strategies, it may be necessary for workers to wear respiratory protection. Contractors shall implement and maintain a respiratory protection program for worksites at which the risk of respiratory hazards exists to ensure that its workers and their subcontractor's workers are physically able to use respirators safely and effectively.

The program shall include worker assessments involving physical and psychological capacity to use respiratory protective equipment and, pulmonary function tests to confirm that the individual can use positive pressure and/or demand breathing systems without harm or discomfort.

To wear respiratory protective equipment (RPE), contractor's workers must:

- Complete respiratory fit testing in accordance to CSA Z94.4-02 Selection, Use, and Care of Respirators and provide proof of applicable RPE training within the last two years
- Provide proof of applicable RPE training within the last two years, including *Cenovus's* Respirator Awareness module
- Provide proof of physical and medical fitness required for the safe operation of RPE
- Be acceptably clean shaven

For more information regarding developing a RPE code of practice see *WorkSafe Alberta's* Guideline for the Development of a Code of Practice for Respiratory Protective Equipment.

11.14 Hearing conservation program

High Risk

All Cenovus worksites have areas of noise exposure above 85dBA; most oil and gas operations and equipment have potential to exceed 85dBA. The contractor's health and safety program must include a specific program for managing worker exposure to excessive noise (AB- 85dBA / SK- 80dBA) which must include at a minimum:

- Documented noise exposure (hazard) assessment
- Noise management procedures or reduction strategies
- Use and maintenance of hearing protection devices including worker instruction, and *Cenovus's* Hearing Conservation module
- Audio metric testing program for workers, complete with testing records

For more information regarding hearing conservation programs see:

- *WorkSafe Alberta's* Audiometric Testing: Information for Employers and Workers
- *WorkSafe Alberta's* Noise at the Work Site

11.15 Thermal exposure & stress prevention program

Medium Risk

Working in hot or cold conditions creates stress on the worker and can pose serious hazards. Fitness to work assessments must include an assessment of any potential limitations to working in hot or cold environments. Contractor's health and safety program shall include a thermal exposure program and resources to aid the workers in becoming aware of the hazards and of possible ways to make work safer in extreme temperatures.

For more information on thermal stress and control measures see:

- *WorkSafe Alberta's* Working in Extreme Temperatures
- *Canadian Centre for Occupational Health and Safety's* Hot Environments – Control Measures

12.0 Safety management requirements

The following section addresses each program requirement of the contractor's health and safety program. It is intended to outline minimum requirements and highlight any Cenovus specific requirement. It is assumed that all contractors have performed the OH&S required hazard assessments and developed specific health and safety programs/ plans as controls where required by the hazard assessment. It is implied that all applicable OH&S legislation must be known, understood, and complied with by the contractor. This section simply acknowledges some of the more common requirements which Cenovus wishes our contractors to present to us for review; the following is not meant to be all-inclusive.

For guidance regarding building a complete Health and Safety Management System see *Enform's* Introduction to Safety Management Systems: Program Development Guideline.

12.1 Adherence to Cenovus Safety commitments and Life-saving rules

Extreme Risk

Working for Cenovus means working safely:

- Our work is never so urgent or important that we cannot take time to do it safely
- All injuries are preventable
- Everyone is obligated to refuse unsafe work
- Everyone is obligated to raise concern about the hazards seen
- All levels of supervision are responsible for safety performance
- Employee and contractor commitment is essential to safety performance
- Excellence in safety leads to excellence in business
- Safety attitude off the job is as important as on the job

Cenovus follows life-saving rules:

- Obtaining authorization before entering a confined space
- Protecting yourself against a fall when working at height
- Work with a valid work permit when required
- Verify isolation before work begins and use the specified life protecting equipment
- Obtain authorization before overriding or disabling safety critical equipment
- Follow prescribed lift plan
- Do not work under or near overhead electric power lines
- No alcohol or drugs while working or driving

Expectations:

- Everyone will follow the life-saving rules
- No work variances will be given for work that falls under a life-saving rule
- If you can't complete a job without breaking one of the rules, you must stop work, advise your immediate supervisor of the situation and obtain an approved work procedure before proceeding
- Cenovus site leadership will develop timely and effective solutions to conditions that prevent compliance with life-saving rules
- Everyone will speak up and intervene if they notice a job that is in planning or underway without due consideration and compliance with life-saving rules
- Everyone will accept intervention if compliance with one or more life-saving rules is under question

12.2 Firearms and weapons

High Risk

The possession and/or use of firearms on Cenovus premises, in vehicles or on aircraft are prohibited subject to written authorization. All requests for authorized possession of a firearm will be submitted to and reviewed by Cenovus Corporate Security, Area Vice-President, in consultation with the H&S Vice-President.

12.3 Smoking

High Risk

Contractors are expected to communicate and enforce the following requirements to their workers:

- Smoking (including e-cigarettes) is only allowed in designated areas
- Designated smoking areas cannot be within 25 metres (82 feet) of wellheads, drilling or service rigs, process or storage facilities, other hazardous areas including motor vehicles within this distance
- Used smoking materials (matches, cigarette butts, and cigar stubs) must be discarded in designated receptacles

12.4 Competency & health and safety training program

High Risk

Contractors have the responsibility to provide appropriate instruction and training to ensure that their employees have the knowledge and skills to perform their jobs safely. The contractor is generally responsible for providing safety and job specific training for its employees unless otherwise stated in their Cenovus contract or agreement.

Contractor's health and safety program shall include a health and safety training program to ensure workers are competent to perform their duties or are directly supervised by a competent person. The program will include a matrix or table that meets Cenovus's requirements for the basic health and safety training. Additionally:

- Contractors are expected to maintain an organizational chart or table listing job titles or roles and specifying competencies (minimum qualifications and training) for each role
- Contractor's Supervisor competencies will align with recognized industry best practices such as *Enform's* Supervisor Competency Guideline
- Contractors are to establish and maintain a training matrix, which reflects the health and safety orientations and training programs required to be completed by contractor personnel and subcontractor personnel
- Contractors are expected to document certification, training, and on the job training required and received by their workers and subcontracted workers
- Contractor's training program will state that workers are required to be tested in order to verify competency prior to performing tasks independently
- Contractors are to establish and maintain an employee health and safety training record indicating the person's name, training course title, date completed, and when refresher training is due/expiry date
- Contractors must be able to show Cenovus representatives the matrix and proof of training records upon request

Contractor's workers and subcontractors will complete Cenovus orientation and awareness training available at www.cenovus.com > Contractor connection > Orientation & training portal.

For more information regarding Training and Competencies programs see: *ENFORM's Competency Management Systems*, and eGSO - Enform.

12.5 New, young, short service workers program

High Risk

Contractor's health and safety program shall include a program intended to implement and maintain a 'Young workers' (under 25), 'New workers' (under six months in the position), 'Short service workers' (working less than three months), Program that includes:

- Appropriate health and safety training (as determined by hazard assessment) for worker and mentor
- Mentoring and effective supervision at the worksite
- New/young/short service worker visible identification program
- Monitoring and assessment of defined competency phases (six months, one year, etc.)

Contractors must outline the composition of their workforce on Cenovus sites and submit to Cenovus the ratio of supervisors, journeyman craft, apprentices, and new, young, or short service employees working on Cenovus sites. Cenovus may limit the number of new or short service workers on a specific work scope based upon the nature of the project.

For more information regarding young workers see *WorkSafe Alberta's* Young Workers.

For more information regarding journeyman to apprentice ratios see *Government of Alberta's* Trade and Occupation Regulations.

12.6 High hazard worksite health and safety staffing

High Risk

Contractor's health and safety program must address the level of committed health and safety staff supporting its workers working on Cenovus sites. Contractors will indicate if support is to be provided at site and/or from contractor's corporate or field office. In the case of high hazard worksites, Cenovus may require dedicated health and safety specialist(s) for the duration of the work.

Cenovus considers the following to be high hazard work:

- Any work that would require a permit from Cenovus in order to carry it out safely
- Working at heights
- Working in confined spaces
- Flammable liquid loading/offloading
- Hot work
- Ground disturbance
- Working with electricity or other energy sources
- Critical lifting activities, etc.

High hazard worksites include:

- Oil and gas processing facilities
- SAGD facilities
- Terminal and loading/off loading facilities
- Drilling and well servicing sites
- Pipeline construction sites
- Remote sites that have limited access (typically these sites are accessed by ATV's/UTV's/helicopter)

12.7 Safe work procedures

Extreme Risk

Contractor's health and safety program shall establish and maintain the necessary and appropriate safe work procedures, practices, codes of practice, standards and/or guidelines to carry out Cenovus-assigned work in a manner that safeguards the health and safety of contractor's personnel, subcontractors, Cenovus site personnel, authorized visitors, and other persons at or near the worksite. As part of the health and safety program, the contractor will provide a listing of their key risks and the safe work procedures applicable to the work scope for review by Cenovus.

12.8 Safe work permitting system

Extreme Risk

Contractors may have their own safe work permit process, however Cenovus reserves the right to require that onsite contractors execute Cenovus work under Cenovus's safe work permit process. Instruction on the Cenovus safe work permit process will be provided as required by Cenovus.

For more information regarding Safe Work Permitting see *WorkSafe Alberta's* Safe Work Permits.

Work with a valid work permit when required is one of Cenovus' Life Saving Rules

12.9 Workplace & equipment inspection program

Extreme Risk

Contractor's health and safety program will provide a description of workplace and equipment inspection processes used by the contractor to identify and correct deficiencies, including:

- Focus of inspections (workplace condition, equipment, tools, personal protective equipment, substandard/unsafe conditions, etc.)
- Inspection schedule and/or frequency
- How inspections are recorded so that deficiencies can be tracked to closure
- Associated forms
- Worker instruction and training related to performing inspections

Cenovus may require contractors, in conjunction with Cenovus representatives, to have its site management team conduct inspections at defined frequencies based on the risk of work.

12.10 Health and Safety communications program

High Risk

Contractor's health and safety program shall establish and maintain a health and safety communications program or process that incorporates health and safety focused meetings, group communications and individual communications where appropriate. Specific requirements will vary based on the nature of work being conducted by the contractor.

Required onsite contractor meetings include:

- General site health and safety meetings hosted by the contractor and attended by all contractor and subcontractor personnel. Meeting schedule to be submitted to Cenovus for approval of agenda and frequency. Meetings are to be documented by the contractor and available for review by Cenovus upon request.
- Pre-job or toolbox/tailgate meetings:
    - at the start of each day
    - prior to any new work activity and when there has been a change in work activities for that day

- at shift change
- when a new worker joins the work group

- Contractor incident review meetings

Cenovus meetings:

- Contractors shall arrange for the attendance of key contractor personnel, contractor safety specialists and other contractor personnel as required by Cenovus
- Cenovus may require contractors to participate in Cenovus work site safety initiatives or campaigns, such as Cenovus's Start Safe and Life-saving rules implementation

12.11 Health and Safety reporting

High Risk

Contractors shall prepare and submit to Cenovus upon request, the following health and safety reports:

- Incident, near miss notifications, in accordance with Cenovus Incident Management Program
- Incident investigation reports
- Modified work program reporting
- Report on topics and attendance of all pre-job meetings
- Health and safety inspection reports (tools, equipment, worksites)
- Daily reports on the number of personnel on site at the start of the day (identifying new and young workers)
- Notification to Cenovus when key personnel are removed from Cenovus sites and new ones brought on
- Summary information of health and safety system monitoring activities to include but are not limited to:
  - number of hours worked for all personnel (including all subcontractors)
  - number of incidents by type (including all subcontractor incidents)
  - number of incidents sustained by new and/or young workers
  - Common health and safety leading indicator statistics/trends, such as behaviour observations, hazards identifications, near misses, etc…
  - common health and safety lagging indicator statistics/trends, such as: frequency rates for lost time, medical aid, restricted work, and total recordable incidents (as defined by *Canadian Association of Petroleum Producers'* Health & Safety Performance Metrics Reporting Guide), and other statistics that may be requested by Cenovus from time to time
  - details of outstanding corrective actions for follow-up resulting from inspections, investigations, emergency response drills and health and safety meetings
  - other health and safety-documentation that Cenovus may require as dictated by the scope of work being conducted

12.12 Health and safety management of change program

High Risk

Contractors shall implement and maintain a management of change (MOC) process in their health and safety program, specific to management of health and safety related change issues. The health and safety MOC program must address at a minimum:

- Methods for identifying health and safety changes that could impact process and worker safety
- Areas requiring re-assessment of hazards and risks
- Actions required for various risk levels of change
- Communication techniques required for various risk levels
- Documentation of MOC activities

12.13 Behaviour observation program

Medium Risk

Contractor's health and safety program will include a specific program for contractor's workers to identify safe and at risk behaviors while engaged in work on Cenovus sites.

The process should involve:

- Supervisor-to-worker and peer-to-peer job observation and intervention procedures
- Training and instruction on the Behaviour Observation (BO) program
- Positive reinforcement observations, as well as correction of at risk behaviours and intervention where required
- Method to provide Cenovus with trends of safe and at risk behaviours noted by contractor workers and subcontractors working on Cenovus sites

Contractor will provide Cenovus with the records of the behaviour observations conducted by their workers/subcontractors on Cenovus sites for tracking in Cenovus's Incident Management System (IMS). Contractors may elect to adopt Cenovus's BO program.

12.14 Hazard ID & near miss reporting program

Medium Risk

Contractor's health and safety program will include a program for the reporting of Hazard ID's and Near Misses. The program will include a form specifying the following requirements:

- Location of occurrence
- Contractor companies name and worker (optional)
- Description of hazard or near miss
- Identified root cause(s) of near miss
- Potential risk level of hazard
- Recommended corrective actions
- Corrective actions completion date and sign-off

Contractors will maintain a recording and tracking database as well as provide Cenovus with records of hazard ID's for tracking in Cenovus's IMS. Contractors may choose to utilize the Cenovus hazard Id and near miss reporting program.

For more information regarding Hazard reporting see; WorkSafe AB Leading Indicators for Workplace Health and Safety.

12.15 Incident management program

Extreme Risk

Contractor's health and safety program must specify the reporting structure of all workers for reporting worker incidents. This is to ensure that subcontractor's incidents are applied to the contract holder's incident statistics. Contractors are accountable for all subcontractor incidents.

Incident management expectations for contractors include:

- Immediately report all incidents that occur within their company or a subcontractor while performing work for Cenovus. A representative of the contractor is expected to verbally contact the appropriate Cenovus relationship owner (business representative) and the Cenovus Facility representative to inform them of an incident occurrence.
- Provide an email or other form of appropriate electronic correspondence that documents known facts, immediate actions and the investigation plan within **four hours** of the incident. This communication must meet the intent of the Cenovus Early Incident Notification (EIN).
- Investigate all incidents using the contractor's incident management processes and procedures provided they meet or exceed Cenovus's standards
- Determine the root cause(s) of all incidents and demonstrate how this conclusion was made
- Implement a process whereby the senior representative for the contractor company participates in all investigations related to recordable injuries or illnesses, and significant incidents
- Certify their employees participating in incident management and investigation activities have adequate training and competencies that meet or exceed Cenovus's standards
- Provide Cenovus an initial incident report within **24 hours** that satisfies the requirements set forth in the Cenovus Initial Incident Report Form
- Provide Cenovus a final written incident report within **72 hours** for all low-impact incidents as defined by Cenovus's impact tool below
- For significant incidents(as determined by Cenovus's impact rating tool), agree with Cenovus upon an adequate timeframe for the delivery of a final formal report including root cause analysis (RCA) and corrective actions
- Demonstrate what formalized RCA method was used to determine the root cause of an incident
- In the final written report, include quality investigation results, corrective actions and plans to verify corrective action effectiveness
- Provide Cenovus with any additional evidence or documentation related to an incident or an incident investigation that occurs at a Cenovus worksite
- Participate in and present incident lessons learned at Cenovus sponsored incident review meetings
- Allow Cenovus personnel to participate in the contractor's investigation if deemed necessary by Cenovus
- Classify incidents as per the *Canadian Association of Petroleum Producers'* Health & Safety Performance Metrics Reporting of Occupational Injuries and Illnesses Guide

Use the following table to determine Incident Impact

Determine what actually happened and what could have reasonably happened

Impact levels	Actual Impact Level (A) *(How bad was it?)*	Potential Impact Level (P) *(How bad could it have been?)*
Catastrophic 5	Multiple Fatalities	Multiple fatalities or incident that could reasonably have resulted in an "Actual Impact Level 5 - Multiple Fatalities" but **did** not.
Critical 4	Fatality	Fatality or incident that could reasonably have resulted in an "Actual Impact Level 4 – Fatality" and a higher Potential Impact Level 5 (multiple fatalities) is **not** reasonable.
Major 3	• Injury or illness that causes permanent disability or significant life-altering complications • Public health/safety could be jeopardized – evacuation of asset and surrounding community	An incident that could reasonably have resulted in an "Actual Impact Level 3 - Major Impact" and a higher Potential Impact Level is **not** reasonable.
Moderate 2	• Injury or illness that should remedy within weeks to months • No life-altering complication • Staff health/safety jeopardized – evacuation or quarantine of asset	An incident that could reasonably have resulted in an "Impact Level 2 – Moderate Impact" and a higher Potential Impact Level is **not** reasonable.
Minor 1	• Minor injury or no injury • Injury or illness that should resolve without life-altering complications in hours/days	A safety event that could reasonably have resulted in an "Actual Impact Level 1 - Minor Impact" and a higher Potential Impact Level is **not** reasonable.

12.16 Emergency management & response plan(s)

Extreme Risk

Contractor's health and safety program must include requirements for emergency response plan (ERP) activation and notification as per the Cenovus emergency response orientation for service provider's handbook. In addition, in order to ensure seamless communication and control of emergencies by Cenovus staff on Cenovus sites, the contractor shall establish a worksite emergency response plan for foreseeable emergency situations that integrates with the Cenovus asset-specific ERP.

Contractor ERPs must include at a minimum, the following:

- A hazard assessment (vulnerability assessment) to identify potential emergencies
- Procedures for responding to identified emergency situations
- Location and instruction for use of any emergency equipment
- Location of emergency facilities (muster areas and medical treatment facilities)
- Alarm and notification protocol
- Designated emergency response personnel

Contractors shall also indicate to Cenovus how they maintain their level of emergency preparedness by documenting the type and frequency of any drills that will take place on Cenovus sites. Contractors must notify Cenovus in advance of any drills a contractor is going to execute on our worksites. Cenovus reserves the right to require drills to be rescheduled or deferred due to potential for conflict or confusion on worksites with multiple work groups or where there are high risk operational activities going on. Contractors may be required to participate in Cenovus led emergency response drills or scenarios.

For more information regarding Emergency response plans and procedures see: *Enform's* Health and Safety Management System Templates: Chapter 6 – Emergency Response Planning.

12.17 Personal protective equipment

High Risk

Contractor's health and safety program will include instructions regarding use of PPE as a control measure to protect workers from hazards identified through their hazard/risk assessment process.

Contractors will provide appropriate training for their workers and subcontractor's workers for the selection, use, inspection, care, and maintenance of personal protective equipment including but not limited to:

- Fire retardant clothing
- High-visibility clothing
- Cold-weather protective clothing (winter work)
- Protective footwear (appropriate to the season(s)/terrain)
- Protective eyewear
- Protective headwear
- Hand protection (appropriate to the task)
- Hearing protection, as per section 11.14
- Respiratory protective equipment (RPE), as per section 11.13
- Task-specific protective equipment, such as:
    - fall protection equipment
    - high voltage electricity safety equipment
    - confined space rescue equipment
    - welding, cutting, burning protective equipment

12.18 Machine, equipment, hand tool, & knife, hazard control program(s)

High Risk

Contractors shall implement and maintain a machine, equipment, hand tools, and knife hazard control program that addresses the following elements:

- List/inventory of cutting tasks/activities requiring knives
- Inclusion of knife/tool maintenance on workplace inspections checklists and schedules
- Document tasks/activities requiring knife and hand tools in the hazard assessment process (e.g. FLHA, JSA)
- Provide appropriate personal protective equipment to workers using knives and hand tools and enforce its consistent use
- Verification mechanism to ensure that workers using knives are competent in use and transport of knives
- Inspections of work areas and tool storage locations to ensure that only employer-approved tools and knives with the appropriate safeguards and sheaths are present
- Hazards and controls for powder and air actuated tools
- Hazards and controls for rotating equipment including machine, equipment, and hand tool guarding

12.19 Scaffold inspection program

High Risk

Where a contractor is responsible for the supply, erection, use, or dismantling of scaffolding, the contractor's health and safety program shall include:

- A process whereby, before the scaffold is released for use by the erector, and after any modifications have been made, the scaffold is inspected and tagged by a competent person
- A process to ensure scaffold tags evidencing such inspection and identifying any known hazards, are affixed to the scaffold in a visible location, clearly legible, dated and signed by the qualified, authorized and competent person who conducted the scaffold inspection
- Instruction/ training is provided to workers dependant on their duties in regard to scaffolding (i.e. erection or use)

Cenovus may randomly audit scaffold tags.

12.20 Portable ladder safety program

High Risk

Contractor's health and safety program shall include a program that addresses the safe use of all portable ladders including step ladders. The program will at a minimum address:

- Instruction/training regarding the safe use of various ladders
- Alternate equipment to use instead of ladders
- Proper selection of ladders
- Proper set up and usage of ladders
- Inspection of ladders
- Use of fall protection when working from a ladder

12.21 Safety barrier erection and maintenance program

High Risk

Contractor's health and safety program shall include a program for the development, implementation and maintenance of a safety barrier system to include permanent, semi-permanent and temporary barriers to support worksite safety. Where a contractor erects temporary barriers, such as ribboning the contractor shall:

- Maintain safety ribbons, where applicable, during the services, and check all safety ribbons at the end of each shift
- Not place or leave ribboning anywhere it is not required, and appropriately discard all ribboning no longer required
- Tag all safety ribboning with the contractor's identification and reason for exclusion, at all possible access points
- Perform such other actions and measures regarding worksite barriers that may be required under the circumstances, or that Cenovus may require

12.22 Worksite housekeeping program

Medium Risk

Contractor's health and safety program shall include a program for worksite housekeeping to maintain the worksite and all working areas in a neat, clean and sanitary condition at all times. It is essential that all means of access and egress, including walkways, stairways, ladders and emergency exits are kept usable and free from obstructions.

Minimum housekeeping requirements include but are not limited to:

- Work areas shall be either broom cleaned, vacuumed or hand picked clean at the end of each work shift
- All garbage containers within the work area shall be emptied and the waste disposed of in accordance with regulations and Cenovus requirements
- All tools and equipment shall be stored neatly in appropriate containers or racks
- All air hoses and power cords shall be neatly tied off, hung, or taped to floor or overhead beams
- All demolition and salvage material shall be cleared from the work area immediately following removal (i.e. insulation, tube and pipe cut-outs, etc.)

Additional housekeeping actions or measures may be required by Cenovus.

12.23 Preventative maintenance program

High Risk

Contractor's health and safety program shall define a program for inspecting and maintaining all contractor supplied powered mobile equipment (aerial work platforms, Off Highway Vehicles/All-Terrain Vehicles, and motor vehicles). The program must contain at a minimum:

- Vehicle inventory
- Required safety equipment inventory
- Preventative maintenance plans for each type of vehicle
- Qualifications to perform various levels of vehicle inspections
- Operator certification and training requirements
- Availability of operators manual
- Visual, pre-use inspections, including safety devices such as horns, back up alarms, positive air shut off (PASO) for diesel equipment
- Periodic mechanical inspections
- A process for reporting defects and tagging out of vehicles/equipment to protect against unintentional movement when not in use
- A process to track repairs or service orders, and return to service

Records will be maintained by the contractor as part of their preventative maintenance program and available to Cenovus upon request.

12.24 Rigging, lifting & hoisting equipment program

Extreme Risk

Contractor's health and safety program shall address the inspection, maintenance, storage and transport of contractor provided rigging, lifting and hoisting equipment and any loose gear, slings and shackles and other equipment related or incidental thereto ("lifting equipment"). The program shall ensure that lifting equipment brought onto Cenovus sites is proven to:

- Be inspected, maintained, transported, stored/sited and used by competent contractor personnel in accordance with the applicable regulations, manufacturer instructions, Cenovus policies, standard industry practice, and any other applicable standards, requirements and instructions that may apply, or that Cenovus may require
- Be subject to contractor's ongoing maintenance and inspection plan
- Include to Cenovus' satisfaction, all up-to-date records, including all records related to maintenance, inspection and safety record of the lifting equipment, documentation and certifications, including as to load capacity, required for operation
- Be delivered to the worksite by contractor in advance of the work, complete with all supporting documentation for review by Cenovus personnel
- Be appropriately and clearly marked with the safe working load of the specific pieces of equipment and with some visual identification of when the equipment was last inspected

12.25 Cranes and critical lifts program

Extreme Risk

Contractor's health and safety program shall address whether critical lifts will be a part of the work scope. Critical lifts include those which:

- Exceed 80% of the crane, electric hoist or hydraulic hoist safe working load
- Requires the use of two cranes
- Requires special lifting equipment
- Must be made in proximity to energized power lines
- Any lift deemed by site supervision, lift coordinator, or a responsible engineer to be categorized as a critical lift

Should the contractor's work scope involve conducting critical lift(s), the lift must be coordinated with the responsible Cenovus Representative and conducted in accordance with local site procedures for critical lifts.

As a minimum, contractors must submit detailed procedures for critical lifts one week prior to the lift and shall ensure that for all critical lifts, rigging drawings, approved by a registered professional engineer, are produced.

Follow Prescribed Lift Plan is one of Cenovus' Life Saving Rules

12.26 Fall protection program

Extreme Risk

Contractor's health and safety program shall include an inventory of work tasks where working at heights exceeding 1.8 metres (6 feet) is required.
For each task identified a fall protection strategy must be described in the form of a fall protection plan. The plan must include:

- Fall hazards related to each task
- Fall protection devices and systems assigned to control the hazards
- Anchor points for fall arrest, fall restraint, travel restraint systems
- Clearance distance calculations for fall arresting systems
- Planned use of control zones and guard rails
- Fall protection equipment use and maintenance instructions
- Fall recovery and rescue plans including rescue equipment, rescue personnel, and rescue procedures
- Procedures to protect workers below from dropped objects
- Required certification and instruction of workers

For more information regarding Fall Protection Plans see *WorkSafe Alberta's* Fall Protection Plan.

Protect yourself from a fall when working at height is one of Cenovus' Life Saving Rules.

12.27 Fire & explosion prevention program

Extreme Risk

Cenovus sites are considered to contain combustible, flammable, and explosion hazards. Contractor's health and safety program shall include a plan describing the hazard assessment and control strategies prescribed by the contractor to mitigate the risk of fire and explosion.
At a minimum the plan should address:

- Identification of flammable, combustible, and explosive substances likely to be present, including wellbore and downhole explosion hazards
- Monitoring equipment required to allow early warning by detection
- All grounding and bonding requirements are identified, provided and used
- Required responses to alarms such as evacuation and source isolation
- Control of ignition sources including but not limited to, open flame, sparks hot slag, motor vehicles, cigarette smoking, electricity (including static)
- Prescribed tools used to prevent ignition, positive air shut off devices (within 25 metres of production equipment), spark arrestors, explosion-proof and intrinsically-safe tools
- Control techniques such as removal of combustibles, purging/inerting, use of hoardings, fire blankets, foam blanketing, etc.
- Worker training in the fire and explosion prevention program and gas detection/monitoring equipment
- Emergency response plans in the event of fire or explosion

For more information regarding fire and explosion prevention see:

- *Government of Alberta's* Occupational Health and Safety Code Explanation Guide Part 10
- *Enform's* Enform IRP - Volume #18- Fire and Explosion Hazard Management
- *Enform's* FireSmart® Field Guide for Upstream Oil and Gas Industry

12.28 Welding, cutting & grinding safety program

Extreme Risk

Specific to preventing fires and explosion, occupational health hazards, and physical contact with heat, sparks, slag, radiation, and welders flash; the contractor's health and safety program should include a specific program for welding, grinding, gouging, and torch cutting. The program should include topics such as:

- Hot work permitting
- Identification of hazardous areas and tasks
- Prevention of "contact with" type welding hazards
- Spark control strategies
- Placement and securement of compressed gas cylinders
- Use of welding screens to protect other worker from welders flash and sparks
- Ventilation
- Required PPE, including respiratory protection equipment (RPE)
- Tool use and maintenance, including guards, handles, spark arrestors, fire blanket, fire watch and extinguishers

12.29 Ground disturbance program

Extreme Risk

If applicable to the contractor's scope of work, ground disturbance, excavation, tunnelling, and ground penetration activities must be addressed in the contractor's health and safety hazard assessment program. Hazard assessment should identify requirements for the following at a minimum:

- Identification of underground and overhead utilities
- Line locates and limits of approach requirements
- Isolation and insulation opportunities
- Hazards associated with digging/excavation equipment
- Spotting and daylighting procedures
- Excavation hazards and classifications (confined space/restricted area/ hazardous atmosphere)
- Awareness and competent worker level training requirements including *Cenovus's* Ground Disturbance Awareness
- Provision of a ground disturbance supervisor
- Rescue procedures, equipment, and personnel

For more information regarding Ground disturbance programs see *Common Ground Alliance's* Best Practices Guide.

12.30 Adherence to Cenovus Electrical Work Practice (EWP)

Extreme Risk

If contractor's work scope includes any type of electrical work the contractor's health and safety program must contain procedures and processes that:

- Assure electrical worker competency in electrical safety in accordance with one or more of the following: CSA Z462, *Enform's* Electrical Safety: A Program Development Guideline, or NFPA 70E
- Adhere to the Cenovus Electrical Work Practice when working at a Cenovus facility
- Contractors must complete the *Cenovus's* Electrical Work Practice Training

If contractor's work scope includes the use of electrical tools or equipment on Cenovus worksites, the contractor's health and safety program must include provision for worker instruction/training of *Cenovus's* Electrical Safety Program: Training for Non-electricians.

12.31 Working around overhead utilities program

Extreme Risk

Where the contractor's work will be performed within 7 metres (23 feet) of energized overhead power line, the health and safety program must contain a plan or program which addresses adherence to Cenovus's Overhead Power Line Encroachment Permit. Additionally the contractors program must contain at a minimum the following:

- Instructions to notify the power line operator and determine both the line voltage and safe limits of approach before placing any equipment at the site
- Obtain assistance from the power line operator to protect workers involved
- Develop strategies and procedures to ensure limits of approach are not infringed
- The placement of excavated soil or other material so as to not reduce safe clearance
- Awareness and competent worker level training requirements
- Hazard assessment
- Where transported loads greater than 4.15 metres (13.5 feet) in height are to be moved under overhead power lines, safe limits of approach must be maintained

At both Foster Creek and Christina Lake, Cenovus is the owner and operator of electrical facilities and must be contacted prior to work beginning.

Do not work under or near overhead electric power lines is on of Cenovus' Life Saving Rules

12.32 Energy isolation program

Extreme Risk

Contractor's must comply with Cenovus' site-specific/equipment specific LOTO procedures.

The contractor's health and safety program must include the procedures involved, and the level of competence required to maintain, service, repair and test all machinery and equipment for which they are responsible. The program must include at a minimum:

- Identification of all hazardous energy sources (electrical, mechanical, hydraulic, fluid, and stored potential energy) applicable to equipment and work scope
- Strategies and control procedures (LOTO) for each potential energy source
- Procedures for verifying isolation, and testing
- Emergency response for source isolation and release/spill response
- Awareness and competent worker level training requirements, including Cenovus Electrical Safety for Non-Electricians module
- Definitions of competent worker and provision of a LOTO supervisor where required
- Standard operating procedures for pigging and hydro-testing of process piping and transportation (including collection and distribution) pipelines

Verify isolation before work begins and use the specified life protecting equipment is one of Cenovus' Life Saving Rules

12.33 Confined space entry program

Extreme Risk

All confined space entry work at Cenovus sites will be authorised using the Safe Work Permitting system. Contractors must comply with the provisions of Cenovus's Confined Space Permit.

The contractor's health and safety program must include definitions of confined and restricted space and instructions to workers how to identify these spaces and never to enter.

Where the contractor's scope of work includes confined/restricted space entry, the contractor's program must include, at a minimum:

- A Safe Work Permit (SWP) and a Confined Space Entry Permit must be completed. New Permits must be issued when the work scope or work conditions change.
- All workers involved in confined space entry work must complete confined space entry training (Level II) and be in possession of a valid training certificate
- A Pre-Job Hazard Assessment must be conducted and a pre-job review meeting must be held, to review the job scope, potential hazards and hazard control methods, as well as emergency protocols
- When the work inside a confined space is finished, workers must check the space to ensure no tools or workers have been left behind

Each Cenovus asset maintains an inventory that lists all existing and potential confined spaces.

For more information regarding CSE Codes of practice see: *WorkSafe Alberta's* Guideline for Developing a Code of Practice for Confined Space Entry.

Obtain authorization before entering a confined space is one of Cenovus' Life Saving Rules

12.34 Working alone program

High Risk

Most workers in the oil and gas industry work alone at some point, even if it is driving to site. Cenovus requires all contractors to have a working alone or in isolation program. The program must include at a minimum:

- A documented working alone hazard assessment
- Identification of tasks and workers who at times might work alone
- Strategies and procedures which address working alone scenarios and specific hazard control methods
- Records of working alone program implementation and usage

12.35 Winter work program

Medium Risk

Contractors shall incorporate a winter work program as part of their health and safety program, including at least the following elements:

- Definition of winter work, including temperature and precipitation issues
- Establishing appropriate level of cold weather protective equipment, including requirements for appropriate non-slip footwear and traction aids
- Site preparation and snow/ice maintenance and site illumination for work in hours of darkness
- Work/rest re-warming cycles
- Recognition of freeze-thaw cycles for overhead and underfoot hazards
- Control strategies for winter slips, trips, and falls

For more information regarding slips, trips, and falls see *Enform's* Slips, Trips, and Falls Guide - Infoflip.

12.36 Workplace violence & harassment prevention

Medium Risk

Contractor's health and safety program shall include a workplace violence and harassment prevention program. The potential for workplace violence shall be evaluated through a violence risk assessment. The assessment findings and the implementation and maintenance of necessary controls shall form the basis of the violence prevention program.

For more information regarding workplace violence prevention programs see: *Canadian Centre for Occupational Health and Safety's* Violence in the workplace.

12.37 Driving / vehicle safety program

Extreme Risk

Contractor's health and safety program must include a driving safety program that meets the guidelines set forth in the *WorkSafe Alberta's* Driving for Work document.

Cenovus specific requirements and rules include:

- All personnel driving a vehicle shall have a valid driver's license
- Contractor company shall obtain driver abstracts for any of their workers and subcontractors who drive company owned vehicles at Cenovus sites
- Drivers and passengers shall not consume or drive under the influence of alcohol or drugs
- Drivers shall obey all applicable traffic safety act requirements, not exceed posted speed limits, and shall drive according to the weather and road conditions. Traffic fines are the sole responsibility of the driver
- Drivers and passengers must wear their seat belts while in a moving vehicle
- The use of a cellphone (both hand-held and hands-free) or other hand held device while driving is not permitted
- Drivers are responsible for maintaining their vehicle in safe operating condition and keeping their vehicles clean/neat/tidy
- Drivers are responsible to ensure adequate securement of all cargo inside and outside of the cab
- Pre-use inspections and/or walk arounds must be conducted prior to operating company vehicles
- Contractor's vehicles must be pulled through or backed into parking spaces while on Cenovus sites, backing may require a spotter
- All vehicle incidents occurring on Cenovus sites must be reported

12.38 Commercial Vehicles Safety

High Risk

Contractors who operate vehicles with Gross Vehicle Weights (combination of truck + loaded trailer) over 4500 kgs are subject to the *Alberta Government's* Commercial Vehicle Safety Regulation and the *Government of Canada's* Commercial Vehicle Drivers Hours of Service Regulations requirements. Typically, semi-trailers and busses are recognized as meeting this requirement, however any vehicle, once loaded, weighing over 4500kgs are commercial vehicles (CV). As such, all CV operators, on Cenovus sites, are required to ensure:

- Vehicles are inspected every 24 hrs and defects documented & repaired
- Loads are appropriately secured
- Drivers/operators:
    - receive Cenovus site-specific safety orientation & have at a minimum H_2S Awareness Certification
    - have documented pre-assignment A&D testing

