1.0 Purpose

The primary purpose of the Contractor Health and Safety Program Requirements is to provide guidance regarding Cenovus’s minimum health and safety (H&S) requirements for work at Cenovus field sites. This will help ensure that contractors bidding on Cenovus onsite work are aware of Cenovus’s H&S program requirements prior to signing a Cenovus agreement or contract. These requirements are referenced within Cenovus service agreements and contracts and are therefore binding.

The secondary purpose of this document is to support communication and ensure complete transparency of contractor H&S requirements. Cenovus H&S Practices applicable to contractors operating on our field sites are available to view at www.cenovus.com> Contractors>Policies> H&S Practices. Any information published on, or obtained through a link from Cenovus’s website may not include all applicable H&S requirements. Additional requirements may be required for specific jobs, functions or for particular contractors. Also, additional requirements or more updated practices may have been developed and disseminated such that contractors ought to reasonably be aware of such requirements or updated practices, since the date of publication to the Cenovus website, in which case contractors are obligated to ensure the implementation of such recent requirements and updated practices. For specific questions related to Cenovus’s H&S requirements, contact contractorsafety@cenovus.com.

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. The Program Gap Analysis is meant to communicate the known site hazards and the Cenovus prescribed controls (required safety programs), allowing contractors to respond by identifying gaps and “bridging” between their safety programs and Cenovus’s program requirements.

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

2.0 Scope

As owner of the work, Cenovus requires all of 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, training, and other documentation to effectively meet or exceed Cenovus’s H&S requirements.

3.0 Contractor’s H&S Qualification Assurance

Cenovus uses ISNetworld (ISN) to collect contractor’s written health and safety programs and review them to ensure they meet OHS and Cenovus’s requirements. Contractors are required to maintain an Approved status or are otherwise not qualified to work on Cenovus field sites.

Contractors are required to complete the Cenovus H&S Qualification Questionnaire (HSQQ) inside of their Cenovus profile in ISNetworld, committing to these Cenovus H&S program requirements. Contractor’s H&S programs must be submitted to ISN RAVS for evaluation and scoring, which will then be verified by Cenovus throughout the supplier lifecycle, with the intent of continuous improvement and consistent contractor H&S performance management. Based on the level of risk or size of capital project, contractors may be required to develop a Health and Safety Execution Plan (HSEP), or Risk Mitigation Plan (RMP) detailing compliance with Cenovus’s H&S requirements.

Where the 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 or the contractor’s safety orientation and training.
Visitor status may be granted to non-operating personnel requiring access to Cenovus field sites, for the purpose of attending meetings, classroom training, planning work, checking on work crews, participating in tours, or performing visual inspections. Site Visitors require a Cenovus Site Visitor Supervisor (escort) at all times while at the worksite (other than while at camp accommodations). Visitors are not required to be subscribed in ISN.

Before being hired to perform work for Cenovus, or if a Cenovus contractor wants to be qualified for a different scope of work, they are required to evaluate their H&S programs against Cenovus’s H&S requirements by completing the Health & Safety Gap Analysis.

3.1 **Health and Safety Program Gap Analysis**

The purpose of the *Health and Safety Program Gap Analysis* is to ensure that all work is carried out in a manner to protect the health and safety of all workers by aligning health and safety expectations between Cenovus and the contractor. The template outlines specific program requirements and expectations that Cenovus has identified as necessary to address the basic hazards on our worksites. The contractor is expected to use this tool to identify if the contractor has a program that meets the requirements outlined in this document or propose other controls that can be applied to meet Cenovus’s expectations. This allows contractors to demonstrate to Cenovus that their safety programs, processes, or plans adequately address the known site hazards and hazards related to their scope of work, while meeting the minimum Cenovus requirements outlined on the following pages.

3.1.1 **Completing the Health and Safety Program Gap Analysis**

To complete the Gap Analysis, contractors are required to compare their own health and safety programs against the requirements outlined in this document. For each program requirement, the contractor should indicate if they have an equivalent program in place by providing YES or NO answers. If no, the contractor should specify alternate control measures to address the gap(s).

Cenovus has identified a number of programs that are required regardless of the scope of work. Program requirements for which hazard awareness materials may be acceptable have been identified in the gap analysis. Additional programs or other controls may be required by individual Cenovus functions, or as determined by the scope of work.

All H&S program gaps identified within the Gap Analysis below must be mitigated by an alternate control and approved by the Cenovus End User. To complete the Gap Analysis, you can convert this document to Microsoft Word, fill it in and convert it back to a PDF document. You can view the Cenovus requirement by clicking each H&S Program Requirement title in the table below.

**Cenovus End User** (Hiring Manager and/or Front-Line Supervisor):

1. End User is responsible to review contractor’s responses and assess if their program meets Cenovus’s requirements or there are gaps. Provide one of these following answers:
   - Meets requirements – meets all the requirements for each program section
   - Gap Tier 1 - Must be corrected before work begins/continues
   - Gap Tier 2 – Must be corrected but work may proceed or continue
2. End User is responsible to verify that all hazard controls are acceptable and have been implemented and are effective. A Contractor H&S Spot Check should be conducted during the contractor’s first shift, with support from Site H&S.

Example:

Scope of Work

Please provide a detailed description of all the onsite services your company would like to be considered safety qualified to perform. Review your ISNetworld Work Type selections to ensure alignment with the services listed here.

<table>
<thead>
<tr>
<th>Cenovus’s H&amp;S Program Requirement</th>
<th>Risk rank</th>
<th>Awareness materials acceptable</th>
<th>Contractor’s Gap Analysis: Does program meet Cenovus requirements?</th>
<th>Cenovus End User review</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Subcontracting</strong> Subcontractor Management Plan (BP)</td>
<td>High</td>
<td>Yes</td>
<td><strong>YES</strong></td>
<td><strong>Meets requirements</strong></td>
</tr>
<tr>
<td>ABC Company Subcontractor Management Plan XYZ. Prequalification EHSQ available upon request. All subcontracted workers receive ABC’s new hire safety orientation and are directly supervised by ABC staff.</td>
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</tbody>
</table>

| **Subcontracting** Subcontractor Management Plan (BP) | High | Yes | **NO** | **Gap Tier 1** |
| ABC Company does not have a subcontractor management plan and hires subcontractors as required. | | | Contractor must develop and implement before work begins | |
## HEALTH & SAFETY PROGRAM GAP ANALYSIS

<table>
<thead>
<tr>
<th>Name of Contactor:</th>
<th>Date:</th>
</tr>
</thead>
</table>

### Scope of Work
Please provide a detailed description of all the onsite services your company would like to be considered safety qualified to perform. Review your ISNetworld Work Type selections to ensure alignment with the services listed here.

### Cenovus’s H&S Program Requirement

<table>
<thead>
<tr>
<th>Cenovus’s H&amp;S Program Requirement</th>
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<th>Cenovus End User review</th>
</tr>
</thead>
<tbody>
<tr>
<td>RAVS safety program equivalent</td>
<td></td>
<td></td>
<td>If YES list your program name</td>
<td>(Meets requirements / Gap Tier 1)</td>
</tr>
<tr>
<td>4.0 <strong>Subcontracting</strong></td>
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<td>Yes</td>
<td>If NO list alternate control(s) (provide comments as necessary)</td>
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<td>5.0 <strong>ISNetworld subscription</strong></td>
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<td>6.0 <strong>Contractor’s H&amp;S program &amp; performance verification</strong></td>
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<td><strong>General H&amp;S Requirements (AB)</strong></td>
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<td>7.0 <strong>Cenovus policies &amp; acknowledgements</strong></td>
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<tr>
<td>8.0 <strong>Regulatory disclaimer and industry standards</strong></td>
<td>Med</td>
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<td>9.0 <strong>Risk management &amp; hazard assessment program</strong></td>
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<td>10.0 <strong>Contractor health and safety management commitment</strong></td>
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<td>11.1 <strong>Alcohol and drug policy &amp; program</strong></td>
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<td><strong>Drug &amp; Alcohol Policy (BP)</strong></td>
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<td>Cenovus’s H&amp;S Program Requirement</td>
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<td>If YES list your program name</td>
<td>(Meets requirements /</td>
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<td>If NO list alternate control(s)</td>
<td>Gap Tier 1 /</td>
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<td>(provide comments as necessary)</td>
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<td>11.3 Infectious diseases Chemical &amp; Biological Hazards (AB)</td>
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<td>11.4 Medical Fitness for work Fit for Duty (BP)</td>
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<td>11.5 Manual material handling program Ergonomics/Manual Material Handling (AB)</td>
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<td>11.6 Disability management program</td>
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<td>11.7 Fatigue Management Fatigue Management (BP)</td>
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<td>11.8 Occupational hygiene program Chemical &amp; Biological Hazards (AB)</td>
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<td>11.9 Hazardous materials management program Chemical &amp; Biological Hazards (AB)</td>
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<td>11.10 Asbestos Program Asbestos (AB)/ Awareness-Asbestos</td>
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<td>11.11 Hydrogen sulfide program Hydrogen Sulfide (H2S) AB</td>
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<td>11.12 Benzene program Chemical &amp; Biological Hazards (AB)</td>
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<td>11.13 Respiratory protection program Respiratory Protection (AB)</td>
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<td>11.14 Hearing conservation program Noise (AB)</td>
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<td>11.15 Thermal exposure &amp; stress prevention program</td>
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<td>11.16 Hot Environments – Control Measures. Naturally occurring radioactive materials (NORMs)</td>
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<td>12.1 Adherence to Cenovus Safety Commitments and Life Saving Rules</td>
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<td>12.2 Firearms and weapons Workplace Violence/Harassment (AB)</td>
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<td>If YES list your program name (provide comments as necessary)</td>
<td>(Meets requirements / Gap Tier 1 / Gap Tier 2)</td>
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<td>12.3 <strong>Smoking</strong> Fire &amp; Explosion Hazards (AB)</td>
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<td>12.4 <strong>Competency and health and safety training program</strong> Job Competency (BP)</td>
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<td>12.5 <strong>New, young, short service workers program</strong> Short Service &amp; New Employees(BP)</td>
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<td>12.6 <strong>High hazard worksite health and safety staffing</strong> Job Competency (BP)</td>
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<td>12.7 <strong>Safe work procedures</strong> Hazard Identification &amp; Risk Assessment (BP)</td>
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<td>12.8 <strong>Safe work permitting system</strong></td>
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<td>12.9 <strong>Workplace and equipment inspection program</strong> General H&amp;S Requirements (AB)</td>
<td>Ext</td>
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<td>12.10 <strong>Health and Safety communications program</strong> Hazard Id &amp; Risk Assessment (BP)</td>
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<td>12.11 <strong>Health and Safety reporting</strong></td>
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<td>12.12 <strong>Health and safety management of change program</strong> Hazard Id &amp; Risk (BP)</td>
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<td>12.13 <strong>Behaviour observation program</strong> Behaviour Based Safety/Job Observation (BP)</td>
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<td>12.14 <strong>Hazard ID &amp; near miss reporting program</strong> Hazard Assessment (AB)</td>
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<td>12.15 <strong>Incident management program</strong> Incident Reporting &amp; Investigation</td>
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<td>12.16 <strong>Emergency management and response plan(s)</strong></td>
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<td>12.17 <strong>Personal protective equipment</strong> Personal Protective Equipment (AB)</td>
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<td>12.18 <strong>Machine, equipment, hand tool, and knife, hazard control program(s)</strong> Hand &amp; Power Tools</td>
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<tr>
<td>Cenovus’s H&amp;S Program Requirement</td>
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<tr>
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<td>If NO list alternate control(s) (provide comments as necessary)</td>
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<td>12.19 Scaffold inspection program</td>
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<td>Temporary Work Platforms (AB)</td>
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<td>12.20 Portable ladder safety program</td>
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<td>12.21 Safety barrier erection and maintenance program</td>
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<td>12.22 Worksite housekeeping program General H&amp;S Requirements (AB)</td>
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<td>12.23 Preventative maintenance program Preventative Maintenance (BP)</td>
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<td>12.24 Rigging, lifting and hoisting equipment program Rigging (AB)</td>
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<td>12.25 Cranes, hoists and lifting devices Cranes, Hoists, &amp; Lift Trucks (AB)</td>
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<td>Yes</td>
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<td>12.26 Fall protection program Fall Protection (BP) / Awareness- FP</td>
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<td>12.27 Fire and explosion prevention program Flammable &amp; Combustible Substances (HRS)</td>
<td>Ext</td>
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<td>12.28 Welding, cutting and grinding safety program Hot Work (AB)</td>
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<td>12.29 Ground disturbance program Ground Disturbance (BP) / Awareness - GD</td>
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<td>12.30 Adherence to Cenovus Electrical Work Practice (EWP) Electrical Safety (BP)</td>
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<td>12.31 Working around overhead utilities program</td>
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<td>12.32 Energy isolation program Lock out Tag out (LOTO) (AB)</td>
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<td>12.33 Confined space entry program Confined Space (AB)</td>
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<td>Cenovus’s H&amp;S Program Requirement</td>
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<td>Cenovus End User review (Meets requirements / Gap Tier 1 / Gap Tier 2)</td>
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<td><strong>12.35 Winter work program</strong></td>
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<td><strong>12.36 Workplace violence and harassment prevention</strong></td>
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<td><strong>12.37 Driving/vehicle safety program</strong></td>
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<td><strong>12.38 Commercial Vehicles Safety</strong></td>
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<thead>
<tr>
<th>Program Section</th>
<th>Program Title</th>
<th>Program deficiency</th>
<th>Gap Tier 1 or 2</th>
<th>Corrective action required (Contractor to implement and verify)</th>
<th>Target Completion Date</th>
<th>Contractor accountable representative</th>
<th>Cenovus accountable representative</th>
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Contractor H&S Spot Check scheduled date

### Approval and Signatures

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<thead>
<tr>
<th>Signatures</th>
<th>Name</th>
<th>Position</th>
<th>Signature</th>
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<td>Cenovus End User (Hiring Manager)</td>
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<td>Contractor Representative (Contract Manager or Site Rep.)</td>
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<td>Cenovus SCM Rep</td>
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<td>Cenovus H&amp;S Advisor (CSM or Site/Ops H&amp;S)</td>
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4.0 Subcontracting

Contractors who have Cenovus master service agreements, contracts, and purchase orders are contractually responsible for prequalifying and 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 their own, Cenovus pre-approved, health and safety programs. Contractors must ensure that they have suitable subcontractor management programs and have the documentation to demonstrate that they have used their program whenever bringing subcontracted workers to Cenovus field sites.

Subcontractor Management Program must include:

- Ongoing validation of their subcontractor’s Workers Compensation Board (WCB) status, and evaluation of their WCB Injury claims experience (premium rate statements)
- Evaluation of subcontractor’s 3 year rolling Recordable Incident Frequency (TRIF) and other applicable incident/injury statistics
- Communication of these Cenovus health and safety program requirements and evaluation of their capability to comply with the contractor’s safety program by utilizing the Gap Analysis at the beginning of this document
- Evaluation of subcontractor’s worker’s training and competency requirements and records
- Inclusion of subcontractor’s workers in contractor’s orientations, hazard assessments, safety meetings, and pre-project/job meetings
- Processes for conducting subcontractor health and safety assurance on Cenovus jobsites
- Methods for taking responsibility for all subcontractor incidents, inspections, leading/lagging indicators, and all resulting corrective actions
- The provision of a list of subcontractors and their prequalification documentation to Cenovus for review and approval prior to execution of work

For more information on oil and gas industry guidelines regarding contractor management see:

*Energy Safety Canada’s [Contractor Management Systems Guideline](#)*

*Construction Owners Association of Alberta (COAA) [Contractor Environment Health and Safety Management Best Practice](#)*

If your company does not hire subcontractors and have documented awareness materials stating such, you have met this requirement.
5.0 ISNetworld subscription

All contractors performing work at Cenovus worksites are required to be subscribed in ISNetworld (ISN) and connected to Cenovus. Contractors that have not previously worked for Cenovus will first be connected to Cenovus as a Potential Cenovus Contractor. This allows a contractor to confirm that they are safety qualified to perform the selected work types at a Cenovus field site before being awarded a contract with Cenovus. If successful, the new contractor will be connected to Cenovus as a Cenovus Contractor. Contractors must maintain an Approved status on the Cenovus Contractors List to be considered safety qualified to perform the selected work types at Cenovus field sites.

Contractors connected to Cenovus as a Cenovus Contractor must maintain their ISN profile with their most current H&S Statistics, Cenovus H&S Qualification Questionnaire answers, RAVS safety programs, and WCB information including Primary Industry codes representing the work scope(s) performed for Cenovus. Multiple company contacts, including HSE Rep and Contract/Account Manager, must be listed and current.

If a contractor fails to meet Cenovus’s qualification requirements or health and safety performance standards, the contractor’s ISN status will fall to Not Approved. 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 H&S Alerts, Advisories, and Bulletins. Contractors are expected to periodically view the Messages section of ISN and activate all email alerts from Cenovus.

6.0 Contractor’s H&S program & performance verification

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’s evaluation & verification activities (prequalification, 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’s behalf to conduct any health and safety evaluation or verification activity.

For more information regarding oil and gas industry guidelines for contractor verification, see:

*Energy Safety Canada’s [Contractor Management Systems Guideline](#).*

7.0 Cenovus policies & acknowledgements

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

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 standard practices.

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:

9.0 Risk management & hazard assessment program

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 existing and potential occupational health hazards (including physical, biological, chemical and radiological hazards), safety hazards (including harassment and violence), and workplace emergencies which could pose significant risk to worker injury, worker health, the public, or the environment.

Cenovus communicates site related hazards and prescribed controls via safety orientations, H&S Execution Plans, and/or safe work permits (SWP). Contractors must ensure understanding, communication, and implementation of hazard controls to all affected workers. Furthermore, contractors must ensure that they have identified, assessed and controlled all hazards related to their work, including any hazards not identified on the SWP.

Contractors must have a risk management program which incorporates structured processes for both formal risk assessment (e.g. Job Hazard Analysis) and site-specific hazard assessment (Field Level Hazard Assessment), including at a minimum:

- Directions for when to conduct formal hazard assessments verses field level hazard assessments, and when to repeat them. Instruction regarding who needs to be involved in each type of hazard assessment, including hiring clients and subcontractors
- Methods for identifying occupational health, safety, and emergency hazards
- Methods for assessing and determining risk or impact level
- Rules regarding prioritizing higher risk scenarios
• Methods for bypass management of safety critical systems and 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](#)

Energy Safety Canada’s [Safety Program Development - Hazard identification and risk assessments](#)

10.0 Contractor health and safety management commitment

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 company-wide health and safety performance objectives
  • visiting field operations and participating in safety tours, inspections, safety meetings and campaigns
• monitoring completion of health and safety related corrective actions and continuous improvement initiatives

• consulting and cooperating with joint health & safety committee members and/or H&S representatives on health and safety concerns or initiatives

For more information regarding development of a Health and Safety Management Policy see:


### 11.0 Occupational health management requirements

Contractor’s health and safety program shall include applicable policies and programs to ensure the health and wellness of their employees and subcontractors. Cenovus also requires that the contractor’s health and safety program 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 use in the workplace prevention
- Provision of emergency medical services
- Occupational hygiene
- Medical fitness for work:
  - fitness for work medical examination standard
  - fatigue management
  - disability management / safe return to work

#### 11.1 Alcohol and drug policy & program

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, drugs, and certain medications can adversely affect job performance, the work environment, and the safety of our employees, contractors and the public.

Cenovus contractors are expected to develop and enforce Alcohol and Drug Policies and Practices (A&D program) that are consistent with the Cenovus’ [Fit for Duty Policy](#) and its related [practices](#).

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

- Specification of Safety-sensitive workers
- Specific requirements for pre-assignment A&D testing:
  - Cenovus expects any contractor who is assigned to a 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 contractors working in areas where we have clinics with onsite testing facilities (e.g. Christina Lake, Foster Creek, and Bruderheim), it’s mandatory to have an agreement in place with Cenovus’s preferred testing provider, eScreen Canada ULC.

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

Energy Safety Canada’s *Alcohol and Drugs Policy Model – Program Development Guideline*.

### 11.2 Provision of emergency medical services

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 to 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:

*Energy Safety Canada’s Inter-Provincial Workplace First Aid Requirements Planning Guide*.

### 11.3 Infectious diseases

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

### 11.4 Medical Fitness for work

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, drugs, or impairing medications results in, or 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
subcontracted workers on Cenovus jobsites to determine and ensure fitness for
work.

These medical assessments should include:

- Pre-assignment
- Contractors must be able to provide Cenovus with verification of the completion
  of pre-assignment assessments for all personnel they intend to send to a
  Cenovus worksite
- Periodic health
- Fitness-for-work
- Return-to-work
- Other job-specific requirements such as shift work assessment of any potential
  limitations to working in hot or cold environments, or lifting capabilities

Workers may be unfit for work for a variety of reasons, including without limitation
due to injury, illness, fatigue, alcohol, drug or medication usage, psychological
health concerns, other health concerns, or other reasons which affect an
employee’s ability to perform their work safely. 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:

- ACSA’s Physical Demand Analysis for the Electrical Industry
- CCOHS’s Fit to Work factsheet
- Energy Safety Canada’s Fit for Duty
- Mental Health Commission of Canada’s National Standard | Mental Health
  Commission of Canada.

11.5 Manual material handling program

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

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 implemented a 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 subcontracted workers on Cenovus jobsites.

For more information regarding Disability Management program development see: Energy Safety Canada’s Return to Work: Program Development Guideline.

11.7 Fatigue Management

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

- Worker awareness
- Fatigue testing
- Prescribing and tracking hours worked
- Reporting
- Treatment options

For more information regarding Fatigue Management program development see: Energy Safety Canada’s Fatigue Risk Management: A Program Development Guide.

11.8 Occupational hygiene program

Contractors shall conduct a comprehensive health and occupational hygiene hazards 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.
11.9 **Hazardous materials management program**

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

Hazardous chemicals will be identified and tracked from arrival at the worksite to eventual consumption in the process or disposal. Contractors will ensure that chemicals are disposed of in accordance with Cenovus and regulatory requirements. Chemicals disposed of as hazardous waste will be manifested.

In addition:

- Contractors shall not use any hazardous product without Cenovus’s prior approval
- Contractors shall ensure that before any hazardous products (as defined by the Canada Hazardous Products Act) are brought onto a Cenovus worksite, contractors must provide a Cenovus representative a copy and email a 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 hazardous 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
- Contractors are responsible for ensuring that their subcontracted 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:

*Energy Safety Canada’s* Controlling Chemical Hazards in Oil and Gas Industry: Program Development Guideline.
11.10 **Asbestos Program**

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

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

For more information regarding Asbestos, see:

WorkSafe Alberta’s [Asbestos at the worksite: OHS information for employers and workers](#).

11.11 **Hydrogen sulfide program**

Contractors engaged in any operations where H₂S may be or is known to be present at the worksite are expected to have a program or awareness materials 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 H₂S.

Contractors are responsible for:

- Complying with all Cenovus’s H₂S Code of Practice, safe work procedures, operating practices, and rules as presented when site work begins
- Having valid H₂S Alive or general industry H₂S Awareness certification, as appropriate to assigned work duties
- Being aware of all potential H₂S release points, as identified by Cenovus signage
- Wearing and correctly using the required personal protective and respiratory protective equipment
- Immediately evacuating a worksite should their personal monitor or the facility’s H₂S alarm sound
- Reporting to the Work Site Supervisor and End User any sour spills, incidents, and/or unusual conditions which may occur during the work, and stopping the work if necessary

For more information regarding H₂S see:

WorkSafe Alberta’s [H₂S – The Killer](#).
11.12 Benzene program

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

- Review any practices and procedures provided to them by Cenovus
- 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 worksite.

11.13 Respiratory protection program

Contractors shall implement and maintain a respiratory protection program (RPE) or Awareness materials for worksites at which the risk of respiratory hazards exists to ensure that its workers and their subcontracted 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, 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
- 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:
11.14 Hearing conservation program

All Cenovus worksites have areas of noise exposure above 85 dBA; most oil and gas operations and equipment have potential to exceed 85 dBA. The contractor’s health and safety program must include a specific program for managing worker exposure to excessive noise 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
- Audio metric testing program for workers, complete with testing records

For more information regarding hearing conservation programs see:


11.15 Thermal exposure & stress prevention program

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 or Awareness materials 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](https://www.worksafealberta.ca/en/information/health-safety/working-extreme-temperatures)

Canadian Centre for Occupational Health and Safety’s [Hot Environments – Control Measures](https://www.ccohs.ca/oshanswers/heat/heatcontrol.html).

11.16 Naturally occurring radioactive materials (NORM)

Activities such as oil and gas extraction and processing can create conditions that allow NORM to accumulate, leading to elevated levels of radiation that may pose a health and safety risk. Contractors working at Cenovus sites where NORM may be encountered are expected to have a NORM Awareness program in place that includes:

- NORM awareness training/instruction
- Health effects of NORM
- Common sources and locations of NORM in the Oil & Gas industry
- How to identify NORM hazards
- How to prevent or minimize exposure to NORM
For more information regarding the hazards and controls of NORM see:

*Energy Safety Canada’s* [Controlling Natural Occurring Radioactive Material (NORM) Exposure](#)

*WorkSafe BC’s* [Occupational disease hazards in the oil and gas industry](#).

### 12.0 Safety management requirements

There are several key Contractor Leadership actions that are expected by Cenovus throughout the Supplier Lifecycle and during the contracting process.

Leaders from the contractor company must:

- Provide to Cenovus upon request, an organizational chart demonstrating roles related to the contract scope delivery, including Contract Manager, Site Supervision, Contract support, and H&S support

- Communicate clearly Cenovus’s Policies and H&S Program Requirements, including accountabilities, and any delegated responsibilities

- Attend pre-mobilization meetings to kick-off a contract

- Be visible and accessible to the work force

- Participate in site visits, and challenge the performance of risk controls and barriers

- Recognize and reward positive behaviour, or intervene and address behaviour that does not meet expectations

- Participate in contractor/supplier relationship meetings and discuss progress and performance in the delivery of the contractual scope of work

This 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 as well as established a health and safety program that meets the intent of Part 5 Section 37 of the Alberta OHS Act. 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:

*Energy Safety Canada’s* [Introduction to Safety Management Systems: Program Development Guideline](#)

#### 12.1 Adherence to Cenovus Safety Commitments and Life Saving Rules

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 has adopted the Energy Safety Canada Life Saving Rules:
12.2 **Firearms and weapons**

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**

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 5 meters (10 meters in Wood Buffalo) of a door, window or air intake of a workplace
- 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 and health and safety training program**

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 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 that lists job titles or roles and specific competencies (minimum qualifications and training) for each role
- Contractor’s Supervisor competencies will align with recognized industry best practices such as Energy Safety Canada’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 Safety Orientations available at www.cenovus.com > Contractors > Orientation & training prior to coming to site.

For more information regarding Training and Competencies programs see:

Energy Safety Canada’s Competency Management Systems
Energy Safety Canada’s Competency: Are you prepared?
Energy Safety Canada’s Common Safety Orientation (CSO)

12.5 New, young, short service workers program

Contractor’s health and safety program shall include a program intended to implement and maintain a New workers, Young workers, and Short service workers program that includes:

- Definition of New/Young/Short service worker appropriate to risk and role
- 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

Energy Safety Canada’s Green Hands for Green Hands

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**

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**

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

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.

For contractors who are required to receive a Cenovus Safe Work Permit on behalf of their company, the contractor representative must complete the Cenovus Safe Work Permit Management eLearning course through the Contractor Portal prior to receiving a Cenovus Safe Work Permit.

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

12.9 Workplace and equipment inspection program

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 such as workplace condition, equipment (e.g. transfer hoses), 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

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 worksite safety initiatives or campaigns, such as Cenovus’s Start Safe and Life-saving rules implementation

Joint Health & Safety Committee meetings:
• Cenovus may require contractors to participate in the Joint Work Site Health & Safety Committee to represent the contractor workforce in situations where Cenovus is the prime contractor of the worksite, where there are 20 or more workers employed on the worksite, and where the work is expected to last 90 days or more

12.11 Health and Safety reporting

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**
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**
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
Records of behaviour observations conducted by contractor on Cenovus sites should be readily available at the request of Cenovus personnel.

12.14 Hazard ID & near miss reporting program

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 company’s name and worker (optional)
- Description of hazard or near miss
- Identified root cause(s) of near miss
- Potential risk or impact 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 and counts of Hazard ID’s (if requested). Contractor is accountable to manage their work-related hazards, and to report worksite related hazards that cannot be resolved to Cenovus for corrective action.

For more information regarding Hazard reporting see:
WorkSafe Alberta’s Leading Indicators for Workplace Health and Safety.

12.15 Incident management program

Contractor’s health and safety program must specify the reporting structure of all workers for reporting 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 their appropriate Cenovus representative to report the event
- 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
- Immediately commence incident investigation upon report of event to collect evidence, conduct interviews, take pictures, etc.
- 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

- Determine the root cause(s) of all incidents and demonstrate how this conclusion was made

- Completed incident investigation (both for low-impact and significant), including applicable root causes and identified corrective actions must be completed and submitted to Cenovus within 15 days of the event, or as determined by the Cenovus function/ business group

- Cenovus will lead all significant incident investigations (actual or potential impact of 3, 4 or 5) and may lead low-impact incident investigations, as determined by Cenovus

- Contractors may be asked to participate in Cenovus-led investigations, but are expected to conduct and provide to Cenovus their own investigations for all incidents

- 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

- All spills over 1 litre are recorded as an incident whether they are externally reportable or not. Spills under 1 litre are to be recorded as a near miss

- Classify incidents as per the Canadian Association of Petroleum Producers’ Health & Safety Performance Metrics Reporting of Occupational Injuries and Illnesses Guide

- Follow Post-Incident Testing procedures, as per Alcohol and Drug policies and programs
• Use the following table to determine Incident Impact:

<table>
<thead>
<tr>
<th>Impact levels</th>
<th>Actual Impact Level (A)</th>
<th>Potential Impact Level (P)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>(How bad was it?)</em></td>
<td><em>(How bad could it have been?)</em></td>
</tr>
<tr>
<td><strong>Catastrophic</strong></td>
<td>• Multiple Fatalities</td>
<td>Multiple fatalities or incident that could reasonably have resulted in an &quot;Actual Impact Level 5 - Multiple Fatalities&quot; but did not.</td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Critical</strong></td>
<td>• Fatality</td>
<td>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.</td>
</tr>
<tr>
<td>4</td>
<td>• Public health/safety jeopardized</td>
<td></td>
</tr>
<tr>
<td><strong>Major</strong></td>
<td>• Injury or illness that causes permanent disability or significant life-altering complications</td>
<td>An incident that could reasonably have resulted in an “Actual Impact Level 3 - Major Impact” and a higher Potential Impact Level (fatality) is not reasonable.</td>
</tr>
<tr>
<td>3</td>
<td>• Community evacuation</td>
<td></td>
</tr>
<tr>
<td><strong>Moderate</strong></td>
<td>• Medical treatment or hospitalization with restricted work requirements</td>
<td>An incident that could reasonably have resulted in an “Impact Level 2 – Moderate Impact” and a higher Potential Impact Level is not reasonable.</td>
</tr>
<tr>
<td>2</td>
<td>• Asset/site evacuation</td>
<td></td>
</tr>
<tr>
<td>• Public Shelter-In-Place notification</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Minor</strong></td>
<td>• Minor injury requiring first aid or basic medical treatment</td>
<td>A health and safety event that could reasonably have resulted in an “Actual Impact Level 1 - Minor Impact” and a higher Potential Impact Level is not reasonable.</td>
</tr>
<tr>
<td>1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
12.16 Emergency management and response plan(s)

Contractor’s health and safety program must include requirements for emergency response plan (ERP) activation and notification as per Alberta OHS Code Part 7 or WorkSafe BC OHS Regulation Part 4 & Part 32. 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 site or asset-specific ERP.

Contractor ERPs must include at a minimum, the following:

- A hazard 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: 


12.17 Personal protective equipment (PPE)

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 (NFPA 2112-2007) (Rainwear- ASTM F2733 or F1891)
- High-visibility clothing (CSA Z96-09)
- Cold-weather protective clothing (winter work). NOTE: Hooded sweatshirts “hoodies” are not allowed on any Cenovus worksite
- Protective footwear (appropriate to the season(s)/terrain) (CAN/CSA Z195-02)
• Protective eyewear (CSA Z94.3-07)
• Protective headwear (CAN/CSA-Z94.1-05) (CAN3-D230-M85)
• Hand protection (appropriate to the task)
• Hearing protection (CAN/CSA Z94.2-02)
• Respiratory protective equipment (RPE) (CAN/CSA Z94.4-02)
• 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, and knife, hazard control program(s)**

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 inspection 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
• **NOTE**: Cenovus has banned the use of Snap-off blade knives, Multi-tools, Pocket knives, and box cutter utility knives, on our job sites.
• *Snipes and cheater bars are not permitted on Cenovus job sites*
12.19 Scaffold inspection program

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 on a 21 day cycle. Cenovus may randomly audit scaffold tags

- Instruction/ training is provided to workers dependent on their duties regarding scaffolding (i.e. erection or use)

- Awareness materials are acceptable where the contractor’s workers do not use scaffolding

12.20 Portable ladder safety program

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

- Awareness materials are acceptable where the contractor’s workers do not use ladders

12.21 Safety barrier erection and maintenance program

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

• Awareness materials are acceptable where the contractor’s workers do not use safety barriers

12.22 Worksite housekeeping program

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

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 operator’s manual

• Visual, pre-use inspections, including safety devices such as horns, back up alarms, grounding cables, and positive air shutoff (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 and hoisting equipment program

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’s satisfaction, all up-to-date records, including all records related to maintenance, inspection and safety record of the lifting equipment, documentation and certifications, including 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

• Awareness materials are acceptable where the contractor’s workers do not use rigging, lifting, or hoisting equipment

### 12.25 Cranes, hoists and lifting devices standard

Contractor’s health and safety program shall address whether critical lifts will be a part of the work scope. Critical lift includes any of the following:

• Single crane lift over 75% of the load chart capacity

• Any lift with a suspended personnel basket

• Any lift where the load or part of the hoisting equipment is encroaching within seven metres of electrical equipment or power lines

• A hoisting or lifting operation over live process equipment or piping
• A hoisting or lifting operation involving simultaneous use of two or more lifting devices

• Any Lifting operation deemed to be critical by the site owner

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 the Cenovus Cranes, Hoists and Lifting Devices Standard and 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 competent/qualified person, are produced.

Awareness materials are acceptable when the contractor's workers do not use cranes


12.26 Fall protection program

Contractor’s health and safety program shall include an inventory of work tasks where working at heights exceeding 3 metres (10 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

• Awareness materials are acceptable when the contractor’s workers do not work above 10 ft.

For more information regarding Fall Protection Plans see:

WorkSafe Alberta’s Fall Protection Plan.
12.27 **Fire and explosion prevention program**

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 gas detection with the following considerations:
  - Portable gas detection provides life safety warning against unsafe oxygen level and flammable and toxic gases and vapours
  - Portable gas detectors should not be used for process stream gas sampling unless specifically designed to do so
  - The selection of a gas detector must consider the advantages and limitations of the underlying technologies and be appropriate for the atmospheric hazards present
  - Not all atmospheric hazards can be detected
  - A 4-head monitor, worn in the breathing zone, capable of detecting H2S, LEL, CO, and O2 is the default choice for personal gas detection in a typical oil and gas facility
  - Site-specific hazards that dictate the addition or removal from the default 4 sensors require a risk assessment
- 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:

*Energy Safety Canada’s* FireSmart® Field Guide for Upstream Oil and Gas Industry

*Energy Safety Canada’s* Fire and Explosion Hazard Management Guideline (Former IRP 18).

### 12.28 Welding, cutting and grinding safety program

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, *or Awareness materials*, for welding, grinding, gouging, and torch cutting, including 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 workers from welder’s 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

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 appropriate to the work activity
• Provision of a ground disturbance supervisor
• Rescue procedures, equipment, and assigned rescue personnel

For more information regarding Ground disturbance programs see: Canadian Common Ground Alliance’s Best Practices.

12.30 Adherence to Cenovus Electrical Work Practice (EWP)

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, Energy Safety Canada’s Electrical Safety: A Program Development Guideline, or NFPA 70E
• Adhere to the Cenovus Electrical Work Practice when performing electrical work at a Cenovus facility

If contractor’s work scope includes the use of electrical tools or equipment (by non-electricians) on Cenovus worksites, the contractor’s health and safety program must include provision for worker instruction/training of the contractor’s Electrical Safety practice, procedure, or process. If not, then Awareness materials are acceptable.

12.31 Working around overhead utilities program

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 contractor’s 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 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 and safe limits of approach must be maintained
• Awareness materials are acceptable when the contractor’s workers do not work around overhead power lines
12.32 **Energy isolation program**

Contractors must comply with Cenovus’s energy isolation processes when working on Cenovus owned and/or operated process systems, equipment, pipelines, and piping that contain or have the potential to contain hazardous energy.

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
- 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

12.33 **Confined space entry program**

All confined space entry work at Cenovus sites will be authorized using the Safe Work Permitting system. Contractors must comply with the provisions of Cenovus’s Confined Space Permit for confined or restricted spaces where Cenovus is the owner and/or operator. If the confined or restricted space is not owned and/or operated by Cenovus, the equipment owner must develop and implement a Confined Space Code of Practice that meets the requirements of the applicable Cenovus standard and Occupational Health and Safety (OHS) legislation.

The contractor’s health and safety program must include definitions of confined and restricted space and instructions to workers on how to identify these spaces and to never 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 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. Awareness materials are acceptable when the contractor's workers do not enter 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.

12.34 Working alone program

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

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:
Energy Safety Canada’s Slips, Trips, and Falls Guide - Infoflip.
12.36  **Workplace violence and harassment prevention**

Contractor’s health and safety program shall include a workplace violence and harassment prevention program. The workplace violence and harassment program must include both violence and harassment prevention policies and violence and harassment prevention procedures. Workers must be trained to recognize signs of both workplace violence and harassment, the procedures to eliminate and control the hazards associated with both workplace violence and harassment, as well as the procedures for reporting, investigating and documenting these events. The potential for workplace violence and harassment shall be evaluated through the use of the contractor’s hazard assessment program and appropriate controls will be identified and implemented to eliminate, or if not reasonably practicable, control the hazards of violence and harassment.

For more information regarding workplace violence prevention programs see:
- *Canadian Centre for Occupational Health and Safety’s* [Violence in the workplace](https://www.ccohs.ca/oshanswers/health_viol.html)
-are-you-prepared.html)

12.37  **Driving/vehicle safety program**

Contractor’s health and safety program must include a driving safety program that meets the guidelines set forth in the Energy Safety Canada’s [Life Saving Rules: An industry accepted standard](https://www.enerecan.org/safety/health-safety/life-saving-rules.html).

Cenovus-specific requirements and rules include:

- All personnel driving a vehicle shall have a valid driver’s license
- Contractor company shall obtain and review driver abstracts for any of their workers and subcontractors who drive company-owned vehicles at Cenovus sites
- Drivers shall not 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
- 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
- Vehicles operating in fire and explosion hazard areas must adhere to all grounding, ignition source control (positive air shut-off devices), and smoking rules
- Drivers are responsible for maintaining their vehicle in safe operating condition and keeping their vehicles clean, neat and 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

• All vehicle incidents occurring on Cenovus sites must be reported

12.38 Commercial Vehicles Safety

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 4500 kgs. are commercial vehicles (CV). As such, all CV operators, on Cenovus sites, are required to ensure:

• Vehicles are inspected every 24 hours and defects documented and repaired

• Loads are appropriately secured and wheel chocks applied as required

• Drivers/operators:
  • Receive Cenovus site-specific safety orientation
  • Have at a minimum H2S Awareness Certification and have documented pre-assignment A&D testing