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## INTRODUCTION TO THE HEALTH, SAFETY AND ENVIRONMENT MANAGEMENT SYSTEM

SECURE ENERGY (SECURE) is committed to providing a productive, safe, and healthy work environment for all our employees, contractors, subcontractors, customers, vendors, visitors, and the public. The Health, Safety and Environment Management System (HSEMS) provides employees and stakeholders with a clear understanding of SECURE’s workplace health, safety, and environment expectations.

The HSEMS consists of integrated aspects known as “Elements”. These Elements outline requirements and responsibilities for the management of health, safety, and environment (HSE) which apply to all SECURE operations and activities.

The HSEMS is comprised of policies, programs, and practices. Policies establish the health, safety, and environmental commitments of SECURE, the programs provide structure and guidance to meet those commitments, and the practices are the tools provided to all employees, contractors, subcontractors, and suppliers to ensure personal safety and a safe work environment.

SECURE employees are expected to apply the work practices and procedures within the HSEMS that apply to their daily work activities. The HSEMS is developed, approved, and issued by SECURE’s HSE Team with support from SECURE’s Senior and Executive Management.

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## ELEMENT 1: MANAGEMENT INVOLVEMENT & COMMITMENT

The success of the HSEMS is driven by leadership and commitment from Senior and Executive Management and its readiness to provide resources. The Management Involvement & Commitment Element provides guidance on everyone's commitment to actively participate in health and safety programs and to hold themselves and others accountable to the commitments.

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## 1.1. Health & Safety Policy



### Health and Safety Policy 2022

SECURE is committed to inspiring, motivating and supporting a health and safety culture that aligns with our Vision, Purpose, Mission and Values to ensure that everyone goes home safe. This commitment extends to all our people including employees, contractors, customers, visitors, vendors and suppliers.

We are guided by our Policy and remain dedicated to:



#### **CARE**

SECURE cares about the physical, psychological and social well-being of our people, our customers, and our neighbours. SECURE will ensure that all employees, contractors, customers, and visitors understand they are responsible for their own personal safety and for the safety of those around them and that they have the right to refuse unsafe work without reprisal.



#### **COMPETENCY**

SECURE is committed to ensuring employees have the proper training, development and resources so they can safely carry out their work. All managers, supervisors, employees, contractors and visitors will understand and demonstrate health, safety, and emergency response competency as it pertains to their role.



#### **COMPLIANCE**

SECURE is committed to achieve and exceed compliance with all applicable laws, regulations and policies. Additionally, SECURE will embrace and support practical and applicable industry recommended guidelines, programs and practices.



#### **CONTINUOUS IMPROVEMENT**

SECURE is committed to continuous improvement of our Health and Safety Program. We will set performance-driven targets to achieve high standards of excellence and track continuous improvement through annual reviews.

Rene Amirault, President and CEO  
March 2022

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## 1.1.1. Commitment Statement

SECURE’s core values include working safely. Including safety in our core values reinforces our commitment that all employees, contractors, and partners “Go Home Safe”.

Our safety culture is key to delivering this commitment. Safety culture is a set of habits, thoughts and beliefs that drive our behaviour. SECURE is on a continuum driving towards a leading-edge safety program and to evolve our safety culture from one that is systems driven to one that is values based.

We have four priorities that drive the organization toward establishing a strong safety culture. Continuous improvement is integrated into all four tenants of SECURE’s HSE program. The four tenants are:

1. Engagement at All Levels
  - Gather information; good and bad
  - Listen, understand, and receive feedback to make positive changes
  - Involve others in decisions that do or could impact them
2. Situational Awareness
  - Understand your task, be aware of your surroundings and recognize changes
  - “Stop-Think-Plan-Act”
3. Ownership and Accountability
  - Ownership to identify and make changes where necessary
  - Own the outcome not just the task
  - Be accountable for actively participating in creating a great safety culture
  - Take responsibility for what we do and don’t do
4. Sharing of Learnings
  - Share information that is helpful to others
  - Share incident learnings and best practices

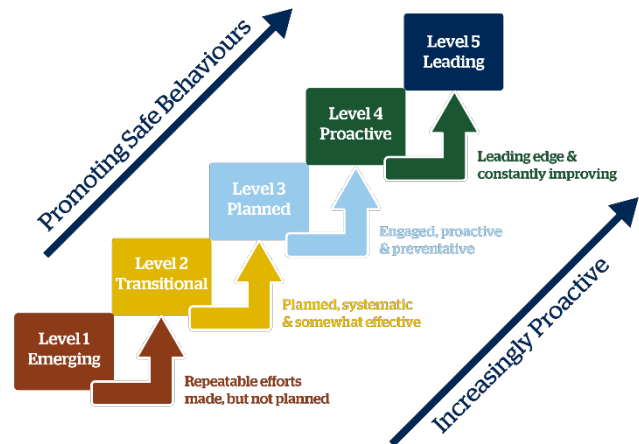


Figure 1 Leading Edge Safety

## Be SAFE, be SECURE.

## 1.1.2. Company Goals

SECURE’s HSE policies guide and support successful implementation of its HSEMS. The policies outline the required approach to managing potential health, safety, and environmental impacts associated with our operations. The HSEMS provides employees with a clear understanding of SECURE’s workplace health, safety, and environment expectations. SECURE employees and contractors are expected to apply the work practices and procedures within the HSEMS that apply to their daily work activities.

The HSEMS consists of integrated aspects known as “Elements”. These Elements outline requirements for the management of health, safety and environment which apply to all SECURE operations and activities. The HSEMS is developed, approved, and issued by SECURE’s Senior and Executive Management Team. The structure of the HSEMS is aligned with the internationally recognized ISO 14001 Environmental Management Systems requirements and ISO 9001 Quality Management Systems requirements.

The HSEMS has been designed to meet the needs of SECURE’s diverse operations and geographical locations

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as well as relevant legislation, client expectations, and/or necessary external certification agencies (e.g., Certificate of Recognition (COR), contractor registries, etc.).

## Scope and Application

The scope of the HSEMS covers all SECURE's operations and activities that affect, or have the potential to affect, the health and safety of employees, contractors, visitors to SECURE operations, and the environment within which SECURE works.

The HSEMS applies specifically to SECURE's employees, contractors, and those who work on SECURE's behalf. Partners, suppliers, visitors, and contractors/subcontractors will adhere to and/or work under the requirements outlined within SECURE's HSEMS, day-to-day operational guidelines, and project and/or client policies. Any management system used by a partner, supplier and/or contractor/subcontractor will meet or exceed the requirements of SECURE's HSEMS.

## HSE Policies

The SECURE HSE Policies are issued annually by the CEO and will include the following:

- Commitment of SECURE management to health, safety, and environmental leadership,
- Requirement to follow all relevant legislation,
- SECURE goals for health, safety, and environmental matters,
- Management responsibility for health, safety, and environmental matters,
- Supervisor responsibility for health, safety, and environmental matters, and
- Workers' responsibility for health, safety, and environmental matters.

### 1.1.3. Roles & Responsibilities

#### General

Occupational health and safety legislation in all jurisdictions where SECURE operates outlines the general obligations and responsibilities of the employer, the supervisor, and the worker.

Responsibilities, which apply to every employee, include the following:

- To work in compliance with occupational health and safety acts, regulations, and codes,
- To use personal protective equipment (PPE) and clothing as directed by the employer,
- To report workplace hazards,
- To work in a safe manner as required by the employer, and
- To understand and follow the agreed safe work practices or procedures.

Every employee has the following rights and obligations:

- Right to Participate
  - All workers have the right to participate in health and safety activities. Workers also have the obligation to alert management of unsafe practices and conditions.
- Right to Know
  - Every worker has a right to know what hazards are present on the job and how the hazards can affect them. The hazards will be presented to the worker(s) during health and safety training, tailgate meetings, general discussions, and in dispatched jobs.
- Right to Refuse
  - A worker has the right to refuse unsafe work and must not carry out or cause to be carried out any work process or operate or cause to be operated any tool, appliance, or equipment if the worker has reasonable cause to believe that to do so would create an undue hazard to the health and safety of any person,



- The worker must report the unsafe condition to a supervisor or a designate without delay and allow sufficient time for the supervisor or the designate to investigate the unsafe condition and make a decision regarding the action necessary to correct the unsafe condition,
- The supervisor will notify Health and Safety,
- The supervisor with help from Health and Safety will perform an in-depth hazard assessment, and full investigation, without delay, and without prejudice and then advise the worker on the conclusions. Any changes to the unsafe condition must be documented and the supervisor or designate must inform all other workers of the change. The event must be entered into the Incident Management System (IMS),
- If the supervisor or designate does not agree that the condition is unsafe, he/she must inform the worker. If the worker continues to refuse to carry out the work, the supervisor or designate will then perform an investigation in the presence of the worker, a worker representative or any other available worker selected by the worker who refused the work is acceptable,
- If this investigation does not resolve the matter, then the supervisor and the worker must notify Occupational Health and Safety without delay, and
- No worker will be subject to disciplinary action for this refusal. If temporary re-assignment is required, no disciplinary action will be initiated. No worker will be subject to disciplinary action for this refusal.

All employees have the responsibility to intervene and stop any work that they believe poses a risk to the safety of people, equipment, and the environment, regardless of the position or employer of the people involved.

### Senior and Executive Management

Senior and Executive Management is responsible for:

- This level includes, but are not limited to, the CEO, SVP, and VP levels,
- Ensuring a Corporate HSEMS is in place,
- Demonstrating a personal commitment to safety,
- Actively participating in two-way safety communication and leadership tours,
- Ensuring that programs are in place for health and safety training and competency,
- Ensuring that resources are in place for health and safety equipment and supplies,
- Ensuring that SECURE policies and work procedures comply with government legislation and the requirements of our clients,
- Ensuring that a program is in place to report all incidents and investigate those with a high-risk potential,
- Ensuring that a program is in place to prevent workplace harassment, bullying and violence,
- Providing a program to ensure individuals' right to refuse dangerous work is supported without reprisal, report imminent dangers, and stop work, and
- Communicating to all employees, contractors, and subcontractors SECURE's commitment to health and safety.

### Middle Management

Middle management is responsible for:

- This level includes General Managers, Area Supervisors, Superintendents, Project Managers, Controllers, and Directors or equivalent,
- Ensuring that the Division's health and safety program is in line with the HSEMS,
- Demonstrating a personal commitment to safety,

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- Leading and participating in safety meetings and two-way communication with their respective teams to promote a positive health and safety culture,
- Conducting site tours, documenting hazard identifications and positive observations,
- Ensuring that competency programs are in place for individuals and contractors,
- Ensuring that resources and training are in place for health and safety equipment and supplies,
- Ensuring that SECURE’s policies and procedures comply with legislation and client requirements,
- Ensuring all incidents are reported, investigated and that corrective actions are completed,
- Ensuring that all incidents related to workplace harassment, bullying and violence are reported to People and Culture,
- Ensuring that regular inspections are conducted on equipment, worksites, and facilities and any corrective actions are implemented in a timely manner,
- Supporting, investigating, and communicating the outcome of right to refuse dangerous work incidents without reprisal to the worker, and
- Ensuring that fit for duty programs are communicated and properly administrated.

## Supervisors

Supervisors are responsible for:

- This level includes Functional Managers, Facility Managers, Sr. Operators, Lead Operators and Project Supervisors,
- Monitoring and confirming compliance with the Division’s health and safety program,
- Demonstrating a personal commitment to safety,
- Leading and participating in safety meetings and two-way communication with their respective teams to promote a positive health and safety culture,
- Conducting inspections to identify and ensure that safe practices and behaviours are demonstrated on worksites, that safety equipment is used properly, and that regulations are being followed,
- Ensuring that all employees are properly trained, and training records are readily accessible,
- Assessing and ensuring that employees are fit for duty,
- Mentoring and observing individual and contractor progression through orientation and competency programs,
- Ensuring that safety equipment and PPE is adequate, maintained, and utilized to manufacturers specifications,
- Investigating and reviewing incidents, near misses, and hazard identifications to ensure appropriate corrective actions are completed within the allotted timelines,
- Supporting, investigating, and assigning corrective actions for all workplace harassment, bullying and violence reports,
- Working with individuals to identify, report, and develop controls for any hazardous conditions, and
- Supporting, investigating, and documenting all refusals of dangerous work without reprisal to the worker, and developing corrective actions.

## Workers

Individuals are responsible for protecting themselves, fellow individuals, the public and the environment by:

- This level includes employees, contract employees, and consultants,
- Completing the necessary Corporate safety orientation(s),
- Attending scheduled safety meetings at designated locations,
- Reporting all incidents, hazards, near misses, injuries, and illnesses immediately to their supervisors,
- Conducting inspections as required,
- Participating in all SECURE training, and complying with training requirements in accordance with their position,

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- Meeting all the requirements of fit for duty,
- Only performing tasks and operating equipment for which they have been adequately trained and deemed competent,
- Properly using and maintaining safety equipment and PPE as per manufacturers specifications,
- Maintaining all facilities and equipment in a clean and orderly manner,
- Conducting and submitting pre-job hazard assessments before beginning work,
- Obtaining approval (permits) from the appropriate operating authority before beginning work,
- Understanding and exercising the right to refuse dangerous work without reprisal and to report imminent danger immediately to your supervisor or manager,
- Follow the policies, procedures and safe work practices and procedures as set forth by the Division,
- Maintain and provide completed current safety training certification(s) upon request, and
- Be aware of the three worker rights: Right to Refuse, Right to Know, and Right to Participate.

## Contractors and Subcontractors

SECURE contracts third party contractors and subcontractors for specific types of work.

When selecting contractors and subcontractors, health and safety is a key consideration. Contractors and subcontractors are managed throughout the project, beginning with prequalification and through to contract close out.

All contractors and subcontractors are required to meet the requirements of this HSEMS. SECURE will provide orientation to all new contractors and subcontractors and all contractors and subcontractors will follow the health and safety requirements as outlined in the HSEMS.

## Visitors

All visitors to SECURE facilities or worksites must report directly to the designated reception or project office. Minimum requirements for visitor site tours include the following:

- Sign in and site-specific orientation,
- A review of present hazards and control measures,
- A representative from the facility or the worksite will be assigned to the visitors, and
- Visitors will remain with their assigned representative throughout the tour.

### 1.1.4. Communication

The Internal and External Communications Element provides a clear communication structure to ensure those working for, or on behalf of SECURE and stakeholders, are kept informed regarding the HSEMS and any issues associated with its activities.

#### Internal Communications

The Health and Safety (H&S) Policy will be communicated to new hires and posted at all SECURE sites. All HSEMS documents, including the H&S Policy, are available on The Station (SECURE's internal website).

The HSE Team, with support from Corporate Communications, will communicate relevant components of SECURE's HSEMS including:

- Critical tasks and associated hazards,
- HSE objectives and targets, and
- Relevant plans or programs.

#### External Communications

When appropriate, SECURE will consult with affected external interested parties (e.g., investors, shareholders, partners, suppliers, contractors, subcontractors, media, etc.) regarding pertinent HSE matters.

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Information regarding the HSEMS such as risks, objectives, and targets will be made available to external parties on request, and as needed, following the approval from the appropriate level of management.

### 1.1.5. Internal Responsibility System

The internal responsibility system is the underlying philosophy of the occupational health and safety legislation in all jurisdictions. SECURE is committed to ensuring that safety in the workplace is a shared responsibility. SECURE has the set expectation that it is the responsibility and accountability of all employees to meet their respective obligations within the applicable internal responsibility system.

SECURE will enact an internal responsibility system to ensure the following:

- Promote a strong safety culture,
- Promote best practices,
- Confirm compliance, and
- Drive continuous improvement.

Specific and measurable targets, goals and objectives are set annually at the Corporate and Divisional levels and are reviewed periodically.

### 1.1.6. Legal Requirements

SECURE ensures legal and other requirements applicable to its operations are identified, understood, and adhered to by all affected employees, contractors, and vendors. SECURE uses a process to maintain current legal requirements such as laws and regulations.

#### Maintaining HSE Legal and Other Requirements

The HSE Team will monitor changes in HSE legal and other requirements on an ongoing basis to determine their continuing applicability to SECURE's operations and activities. Tracking will include existing, new, and/or pending HSE legal and other requirements within the jurisdictions where the corporation operates.

#### Documentation and Communication

Pertinent information regarding HSE legal and other requirements will be communicated to affected operations employees, contractors, subcontractors, and visitors. Key HSE legal and other requirements affecting the organization or specific job functions will be communicated through the appropriate channels.

## 1.2. Other Policies Supporting the HSEMS

### 1.2.1. Environmental Policy

SECURE is committed to environmental stewardship, demonstrating environmental leadership and being an active participant in acting against climate change. SECURE's Environment Policy provides guidance for how SECURE will conduct its business with environmental stewardship at the forefront of business decisions and day to day operations. The policy is founded on six pillars: care, compliance, community, customers, communication and continuous improvement.

### 1.2.2. Climate Policy

SECURE is committed to being an active participant in acting against climate change. SECURE's Climate Policy acknowledges that greenhouse gas emissions are a global concern and that everyone must commit to reducing them in meaningful ways. Our Climate Policy demonstrates our commitment to taking actions to achieve our ultimate goal of being greenhouse gas emission neutral by 2050. Our Climate Action Plan reinforces the commitments in our Climate Policy and outlines how we will achieve greenhouse gas emission reductions within our operations and assist our customers to reach their emission reduction goals.

### 1.2.3. Alcohol & Drug Policy

SECURE is committed to ensuring a safe workplace for all employees and stakeholders. As a result, SECURE has developed and implemented an Alcohol & Drug Policy to ensure that all workers are not under the influence while completing work for SECURE. Please refer to the Alcohol & Drug Policy.

### 1.2.4. Code of Business Conduct

SECURE is committed to high standards of ethical, moral, and legal business conduct. The Code of Business Conduct provides a framework and expectations for how all SECURE employees, Board of Directors, contractors, and subcontractors must conduct business in an ethical and fair manner. Please refer to the Code of Business Conduct.

### 1.2.5. Whistleblower Policy

At SECURE, we are committed to high standards of ethical, moral, and legal business conduct. In demonstrating this commitment, and SECURE's commitment to open and transparent communication, the Whistleblower Policy aims to provide all individuals who represent or conduct work on behalf of or for SECURE with an avenue to raise concerns of unethical, unlawful, or inappropriate behaviour. Please refer to the Whistleblower Policy.

### 1.2.6. Workplace Non-Discrimination, Violence, Harassment & Bullying Policy

SECURE is committed to providing a workplace free from violence, harassment, bullying and discrimination. Please refer to the Workplace Non-Discrimination, Violence, Harassment & Bullying Policy.

### 1.2.7. Progressive Discipline Policy

Managers and supervisors will use a progressive discipline process that serves to correct the behavior, deter others from similar actions, and ensure that standards and expectations are met. Please refer to the Progressive Discipline Policy.

### 1.2.8. Vehicle Policy

SECURE is committed to ensuring the safety of its employees and the public by implementing a Vehicle Policy to guide the expectations surrounding the operation of fleet vehicles.

## 1.3. Related Documents

The following documents are available for use in conjunction with this Element:

- [Health and Safety Policy](#)
- [Environmental Policy](#)
- [Climate Policy](#)
- [Alcohol & Drug Policy](#)
- [Code of Business Conduct](#)
- [Whistleblower Policy](#)
- [Workplace Non-Discrimination, Violence, Harassment & Bullying Policy](#)
- [Progressive Discipline Policy](#)
- [Vehicle Policy](#)

## ELEMENT 2: COMMUNICATION

The Communication Element provides a well-defined system that promotes engagement in the health and safety program. This offers everyone an opportunity to actively participate in the program and provide them with a source of clear and consistent details about the program and other information that supports it. SECURE’s health and safety program has multiple communication mediums including both formal and informal ones.

### 2.1. Safety Meetings

Safety meetings held at SECURE facilities and project sites provide an opportunity to share information about activities undertaken, changes to policies and procedures, non-conformances, and lessons learned.

Safety meetings are used to:

- Communicate hazards and discuss appropriate hazard controls,
- Transfer knowledge and share best practices,
- Deliver informal training, and
- Provide updates and communicate changes.

The types of safety meetings used at SECURE include:

- Safety Stand-Up Meetings,
- Project Kickoff Meetings,
- Daily Tailgate/Pre-Shift Safety Meetings, and
- Scheduled Safety Meetings.

#### 2.1.1. Safety Stand-Up Meeting

Safety stand-up meetings are used to bring together all levels of the company including:

- Leadership,
- Workers, and
- Contractors (if applicable).

The purpose of safety stand-up meetings is to communicate important information that is pertinent to everyone in the company or in a Division. Examples of when safety stand-up meetings are used include:

- After a serious or potentially serious incident occurs,
- When a major change that could increase safety risk occurs, when a significant safety goal or milestone has been accomplished,
- To create awareness or draw attention to something specific, and
- To provide updates on safety performance.

In some instances, these meetings are recorded so that those who were unable to attend can benefit from receiving the information firsthand. Minutes are not typically taken at this type of meeting.

#### 2.1.2. Project Kickoff Meeting

Prior to the start of a project, a formal project “kickoff” meeting is held. The purpose of the meeting is to bring together all project leadership, workers, contractors, client representatives, and stakeholders (as applicable) to review key planning and procedural elements of the project. The meeting offers a chance to consolidate information to provide clarity and allow for any remaining concerns to be addressed. Key topics covered in a Project Kickoff Meeting include review of worksite and emergency contacts, first aid provisions, scope-of-work, worksite rules, hazard assessment review and initial worksite inspection.

### 2.1.3. Daily Tailgate/Pre-Shift Safety Meeting

Daily Tailgate/Pre-Shift Safety Meetings are mandatory, documented meetings with employees, supervisors, and contractors that take place before the start of a work shift. The purpose of these meetings is to review roles and responsibilities, tasks, planned visitors, contractor activities, hazards, and required controls. After the meeting, every person who attended the meeting should understand:

- Scope of work to be carried out for the shift,
- Assigned duties to employees and contractors onsite or travelling to the worksite,
- Identified hazards (e.g., traffic flow, weather) to be encountered that day and the control measures to be implemented to mitigate (minimize or eliminate) the risks associated with these hazards,
- Emergency response plans (if applicable),
- Hazard ID, near miss, and incident report findings, and
- Safety communications as provided by Corporate, Division, Region, or worksite, and third parties.

All hazardous work must be clearly identified and communicated to all personnel required to perform such work, and all work must be performed in accordance with the conditions stipulated on the applicable pre-shift safety meeting form.

These meetings must be documented and all personnel who participate in the meeting must review and acknowledge the meeting form to confirm their attendance or sign the meeting minutes. Visitors should be informed of any hazards specific for that day during their on site safety orientation. *Note: On project sites, as part of the orientation, visitors will review and acknowledge the Daily Tailgate Safety meeting form.*

### 2.1.4. Scheduled Safety Meetings

To foster a values based safety culture, templates have been designed to encourage full discussion regarding worksite safety by all attendees.

Scheduled safety meetings are mandatory and will be led by the supervisor with support from the HSE Team when required. It is the expectation that scheduled safety meetings are documented with attendance and actions items and are held at the frequency listed in the following table.

SECURE Worksite	Frequency (Minimum)
Field Offices, Facilities and Worksites > 90 days	Monthly
Projects/Mobile Worksites	Weekly or Per Shift

Table 1 Safety Meeting Schedule

### 2.1.5. Joint Health & Safety Committees

Each Division will define the required frequency for Joint Health and Safety Committee (JHSC) meetings in their Terms of Reference (TOR). The JHSC meetings are co-chaired by the manager, supervisor, and a designated employee. The meeting agenda items to be discussed will include:

- Previous meeting minutes – these are reviewed, and all action items followed up on,
- Review of Hazard IDs and corrective actions,
- A discussion of any health and safety concerns associated and the status of closure,
- Results of health and safety inspections,
- Results of incident investigations and corrective actions,
- New and existing health and safety regulations, as required,
- Bulletins and alerts,
- Safe work procedures, site-specific procedures, rules, policies, standards, and codes of practice, and
- Training seminars.



## 2.2. Alerts & Bulletins

Alerts and Bulletins are intended to share learnings from near misses, incidents or reported hazards, proactively address identified trends; or to provide information and guidance to respond to legislative, policy or procedural changes.

Alerts are used when the communications are critical and urgent, and where there is an immediate threat to our people, the public, the environment, or our business operations.

Bulletins are used when the communication is important but not immediately urgent and where there may be a potential impact to our people, the public, the environment, regulatory compliance, or our business operations.

Alerts and Bulletins are used to communicate information to all employees either in a Division or throughout the entire company. They are created using the approved SECURE template and reviewed/approved by all Health and Safety Managers (health and safety related) or the Environment and Regulatory (E&R) Team (environment and regulatory related), regardless of Division, and Operations Senior Management of the appropriate Division(s) prior to distribution.

These documents are usually distributed by email and are reviewed at safety meetings, during a Safety Stand Up, or on a conference call/video conference call. Management will determine the appropriate distribution of the Alert or Bulletin. Alerts and Bulletins should be posted on bulletin boards or placed in project binders and are also available on the Corporate Health and Safety site of The Station.

### 2.2.1. Lessons Learned

Lessons Learned sessions provide an opportunity for SECURE leaders to share what they learned from an incident with other leaders within their Division. Lessons Learned sessions are prepared by the Facility Manager or Project Manager and the HSE Team. The Learnings are presented using the Lessons Learned template on a conference call or video conference call. The sessions are not a finger pointing or blame finding session but are intended to drive organizational excellence through open and honest dialogue about what went well and things that could have been done better. Sharing with other leaders creates awareness and enables transparent dialogue about improving performance in the future.

## 2.3. Audits

### 2.3.1. Health, Safety and Environment Management System Evaluation

Evaluating the performance of the HSEMS is important to determine the success of the implementation and to gauge the safety culture throughout the organization. SECURE will periodically assess regulatory compliance and the implementation of and compliance with the HSE system and program expectations to ensure that risks are being appropriately addressed and that management processes are in place and working effectively. This involves both internal self-assessments and external assessments. This information is used to drive continuous improvement through the development of targeted HSE programs, initiatives, and for future goal setting.

The purpose of the HSEMS evaluation is as follows:

- HSE performance standards and indicators are established, communicated, and followed by individuals at all levels of the organization,
- Performance is measured against objectives, targets, and milestones established annually. HSE strategies are updated based on measured results and identified improvement opportunities,
- A documented audit program exists to independently evaluate progress towards HSE targets, regulatory compliance, and the effectiveness of the HSEMS,

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- External audits are carried out a minimum of once every three years, and the results reported to management,
- Processes are in place for documenting and tracking results from assessments and audits, including follow-up actions to close out all findings. Audit results are reviewed by Senior Management,
- Lessons learned from incident and near miss investigations are prioritized, tracked, and used to systematically improve the HSEMS, and
- Sharing of best practices is enhanced through communication of findings and wide participation in audits and system reviews.

### 2.3.2. Audit Process

Audits shall be performed by a certified professional who shall have complete and unhindered access to all worksite/operational resources (employees, documentation, information, etc.) required during the audit. Audits will be used to determine:

- Compliance to regulatory and other requirements (e.g., permits, licenses, regulations, bylaws),
- Conformance to HSE policy and objectives, programs, and overall implementation of the HSEMS throughout the organization, and
- Continuing suitability, adequacy, and effectiveness of the HSEMS.

Upon completion of the audit, the overall audit results shall be consolidated and reported to SECURE leadership.

### 2.3.3. Action Plans

Operational leaders and the HSE Team are responsible for working together to set target completion dates for corrective actions and tracking process to completion. Close-outs will be assessed in future audits.

Following the completion of each audit, an action plan is developed based on the findings and recommendations. Audit findings and recommendations will be prioritized, and higher priority items will get preference over lower priority ones. Action plans may include actions that are specific to an operating location, an area, a Business Unit, or a Division, or could be intended for the entire company. At the Corporate level action plans may include the development and implementation of targeted programs or training initiatives.

Action plans will be documented and include:

- Detail with respect to the identified deficiency,
- Documentation of the action that will be undertaken,
- Designation of the responsible individual,
- Determination of the required due date,
- Date of actual completion,
- Verification of follow-up on action items to confirm satisfactory conclusion, and
- Notation of any required follow-up actions.

### 2.3.4. Communication of Audit Findings

As a demonstration of commitment to health and safety and continuous improvement, the findings of audits will be communicated to affected individuals and to all SECURE employees. Communication will include the results and the action items to be undertaken, based on the audit results. Periodic updates will be provided with respect to progression towards completion of items identified on the Audit Action Plan.

### 2.3.5. Certificate of Recognition Audit Program

Where available, SECURE will participate in the Certificate of Recognition (COR) audit program.

This program has the following requirements:

- An external audit will be completed every third year, conducted by an auditor(s) who is approved by the Certifying Partner to conduct external audits,
- The external audit will commence no later than the expiry date on the COR document,
- Maintenance audits or an approved action plan (approved by the Certifying Partner) will be completed annually, and
- Maintenance audits may be conducted by internal and/or external audits, depending on availability and individual needs of each Division and SECURE.

## 2.4. Program Reviews & Annual Improvement Plans

SECURE will conduct an annual review of the HSEMS and health and safety performance. SECURE will evaluate its HSEMS for performance sustainability, adequacy, and effectiveness, and updating it as required. The review will examine program elements through documentation reviews and may involve employee interviews and observations where required.

The program review will include:

- Review of records such as inspections, hazard assessments, permits, incident reports, and statistical reports,
- Evaluation of legal compliance (required new policy, procedure, training, etc.),
- Follow up actions from previous reviews,
- New Job tasks or modification to existing tasks,
- Accountability measures through recorded observations, disciplinary action, and compliance with Life Saving Rules, and
- Review of previous year OHS objectives, performance targets and goals.

Senior Management will compare HSEMS and performance records to identify trends. Based on the review, opportunities for improvements will be identified and actions will be taken to improve performance. Health and safety targets and objectives for the year will be identified and progress will be monitored throughout the year. Performance targets and objectives and progress updates will be communicated to everyone at all levels in the organization.

## 2.5. Off the Job Safety

A strong, values driven safety culture is supported by creating the mindset that if it can't be done safely it is not worth doing applies not only at work but also at home. Periodically Corporate or Divisional health and safety campaigns will be specifically targeted on off the job safety.

## 2.6. Roles & Responsibilities

### Senior and Executive Management and Middle Management

- Demonstrate strong visible leadership and commitment to HSE assurance processes such as audits, and
- Foster an atmosphere of support for changes triggered as a result of Bulletins and Alerts and take strong leadership roles during Safety Stand Up Meetings.

### Supervisors

- Provide adequate instruction to employees and contractors on assurance processes,
- Verify action items assigned, documented, and corrective actions are closed out, and
- Work with the HSE Team to complete action items resulting from audits, Alerts and Bulletins.

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## Workers, Contractors, and Subcontractors

- Provide support to assist in the completion of corrective and preventive actions resulting from audits, Alerts and Bulletins,
- Actively participate in audits upon request, and
- Review Alerts and Bulletins as required.

## HSE Team

- Provide technical support and subject matter expertise during the development of Bulletins and Alerts,
- Actively participate in Lessons Learned sessions,
- Provide support for operations personnel during audit preparation and during audits, and
- Lead the development of action plans driven from audit reports and recommendations.

## 2.7. Related Documents

- Safety Stand-Up Meeting
- [Project Kickoff Meeting Form](#)
- [Daily Tailgate Form](#)
- [Pre-Shift Safety Meeting Form](#)
- Safety Meeting Template
- [Joint Health and Safety Committee Terms of Reference](#)
- [Alert Template](#)
- [Bulletin Template](#)
- Lessons Learned Template
- Audit Action Plan Template

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## ELEMENT 3: HAZARD & RISK MANAGEMENT

The hazard and risk identification, assessment, and control element provides guidance on SECURE’s process for identifying, eliminating, and controlling hazards to work towards reducing the level of associated risk to as low as reasonably practicable (ALARP) when SECURE employees and contractors are performing work.

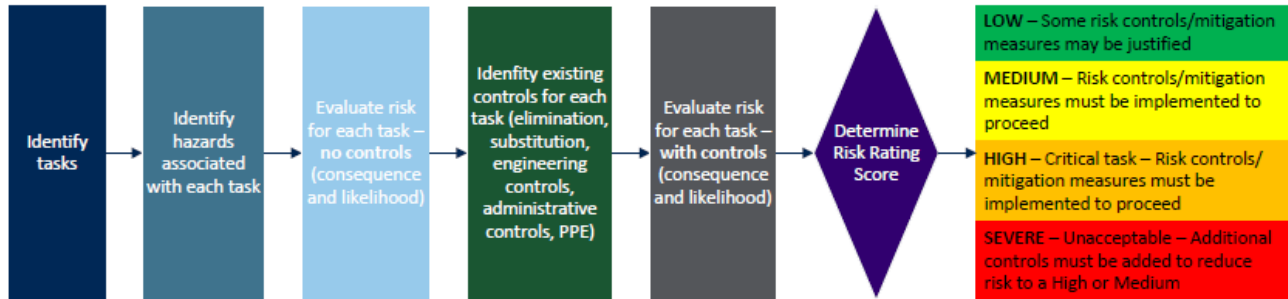


Figure 2 Hazard & Risk Management Process Flow

### 3.1. Hazards

A hazard may be defined as any unsafe act or condition that, if left uncontrolled, can negatively impact people, the environment, compliance, reputation, assets, or operations. It is crucial that the process of managing risk, harm and/or loss begins with properly identifying hazards.

Hazards can be health or safety hazards. Health hazards may produce serious and immediate health effects (acute) or long-term (chronic) health effects while safety hazards are anything(s) that could immediately endanger the safety of someone.

Safety and health hazards can be classified into four categories:

- Physical,
- Chemical,
- Biological, and
- Psychological.

### 3.2. Hazard Assessments

Hazard assessments are the foundation of SECURE’s risk management program and must be documented. Hazard assessments involve the:

- Identification of all job tasks performed by employees and contractors,
- Assessment of each job task for hazards, and
- Prioritization of those hazards based on the level of risk.

All employees, contractors, and subcontractors involved in performing the task or work being assessed should be involved in the hazard assessment and control process or be informed of the hazards identified and the methods used to control or eliminate the hazard during the hazard and assessment control process. Worker participation is documented on the hazard assessment form or the tailgate meeting form.

SECURE employees are required to complete training in the hazard assessment and control process. New employees are informed of the hazards of the work they will be performing and the control measures in place during their orientation and onboarding processes. Everyone has a shared responsibility to use the tools provided to report and document hazards. Identifying and controlling hazards is one way we can all work together to create an injury free workplace.

SECURE recognizes two types of hazard assessments: formal and site-specific.

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### 3.2.1. Formal Hazard Assessment

A formal hazard assessment uses a detailed review of the overall operations of an organization to identify hazards, assess risk, develop, implement, and monitor controls. The formal hazard assessment is developed, stored, and owned at a Divisional level.

A job task inventory lists all positions within SECURE and the associated tasks performed for each position. Each task must be assessed utilizing SECURE’s Risk Matrix for all applicable health and safety hazards.

### 3.2.2. Site-Specific Hazard Assessment

Site-specific hazard assessments include, but are not limited to:

- Pre-Job Hazard Assessment (PJHA) for project work,
- Job Safety Analysis (JSA), and
- Field Level Hazard Assessment (FLHA).

This requirement applies to all SECURE owned and operated worksites, temporary worksites, and customer sites where SECURE employees are performing work. Any hazards identified should be eliminated or controlled before work begins or continues and communicated to the affected workers.

### 3.2.3. Other Documents Supporting Hazard Assessments

In addition to formal and site-specific hazard assessments, SECURE has several tools available to identify and evaluate hazards, such as:

- Hazard IDs,
- Observations, and
- Inspections.

## 3.3. Risk Assessment & Ranking

Risk refers to the chance that harm or loss will occur and how severe the outcomes will be as a result of the hazard. All hazards have risk, but some pose a greater risk than others. Once the degree of risk for each hazard has been assessed, the hazard can be prioritized. Hazards that have a greater risk need to be assigned a higher priority for either eliminating the hazard or developing effective control measures for that hazard.

### 3.3.1. Assessment of Risk – Risk Matrix

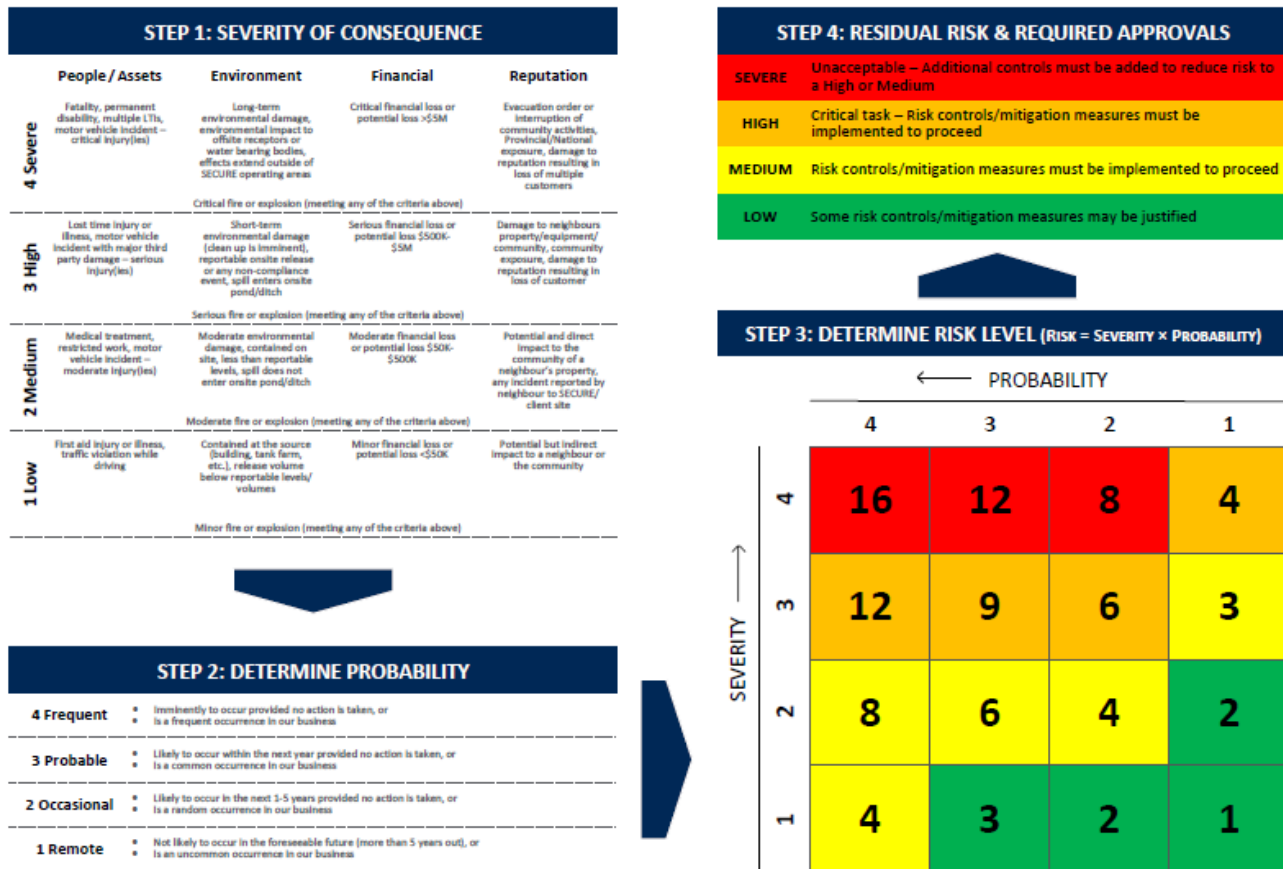
SECURE uses a four by four risk assessment tool to evaluate risk based upon “Severity of Consequence” and “Probability” of occurrence (see Figure 3).

The severity of consequence assigns a rating based on the impact of an identified risk to safety, resources, work performance, property and/or reputation. SECURE defines severity of consequence using a numbered system from one (1) through four (4) with one (1) being the lowest and four (4) being the most critical or severe.

The probability of occurrence explores the likelihood that an identified risk could occur. SECURE defines probability of occurrence from one (1) through four (4) with one (1) being the least likely and four (4) being the most likely to occur.

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# Risk Matrix



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Figure 3 SECURE Risk Matrix

### 3.3.2. Hazard Control Hierarchy

Controls are developed to reduce the potential risk or impact of a hazard to as low as reasonably practicable (ALARP). The hazard control hierarchy will be used to plan and implement control methods. When a hazard cannot be eliminated, and a combination of controls provides the best protection it is preferred that a combination be used.

SECURE uses the hierarchy of controls to appropriately mitigate the level of risk assigned to a particular hazard identified, to protect our people and to meet the appropriate legislative requirements in jurisdictions where we operate.

Eliminating the hazard is recognized as the most effective control measure; when elimination of the hazard is not an option SECURE will systematically mitigate the risk through hazard substitution, engineering controls, administrative controls, PPE, or a

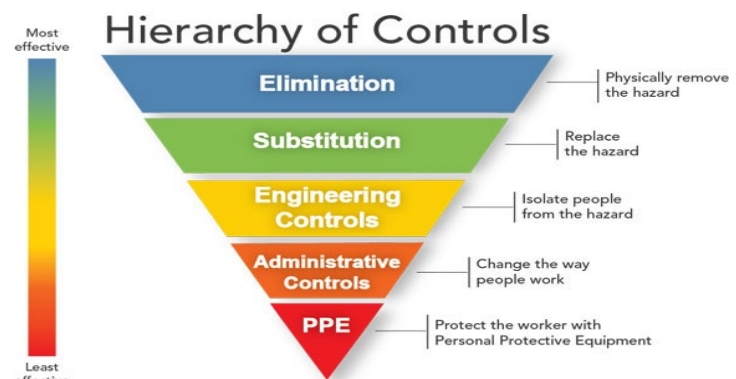


Figure 4 Hazard Control Hierarchy

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combination of these. The controls for each hazard identified are developed and communicated with the affected people(s), responsibilities are assigned for implementation, and a plan for monitoring and evaluating the effectiveness of the controls is agreed upon.

The controls for each hazard should be documented and the hazard should be reassessed with the controls in place to confirm that the initial risk level has been reduced. Care must be taken when implementing a control that it does not introduce a new hazard.

Implementing controls involves the installation of engineering controls, the development of policies, procedures, codes of practice, rules, preventative maintenance schedules and the use of PPE. Implementation may also involve training people to use the controls safely and effectively. Once controls are in place they should be monitored for effectiveness.

Hazard assessment and controls are reviewed promptly after they are implemented to monitor for effectiveness. Subsequent and regular reviews should also take place to verify that original expectations were valid, and the controls are adequate.

### 3.3.3. Documentation & Communication

The hazard and risk management process must be documented, communicated, and maintained. Critical tasks and significant aspects will be communicated to all affected SECURE employees, contractors, subcontractors, and visitors. Senior and Executive Management, at both the corporate and operations levels, will be aware of the corporation's HSE risks and consider these risks in business planning, processes, and decision making.

Hazard assessments must be reviewed and updated at a minimum of every three (3) years for critical tasks and every five (5) years for all other tasks or when any of the following changes occur:

- New tasks, operations, work processes, equipment, materials, or products are introduced,
- Operational processes, work processes, or equipment is modified,
- When inspections identify a previously unrecognized hazard, or
- When changes to policies or procedures as a result of an investigation to ensure new hazards are not introduced.

## 3.4. Management of Change

Management of Change (MOC) is any modification, alteration or adjustment made to a process that is currently in place. Examples include piping additions, direct asset purchases, equipment modification, staffing changes, and procedural changes. The MOC process is used to evaluate and properly manage any modifications to the design or operations of a process while properly evaluating and minimizing any risks associated to the change.

At SECURE, Engineering owns the MOC process and should be consulted for additional details regarding MOCs.

## 3.5. Hazard & Operability Study

A hazard and operability (HAZOP) study is a systematic way to identify hazards in a process. It is used for design and construction of new facilities, major construction projects, new process equipment, or high-risk processes. It is a detailed review technique that investigates how the system or process could potentially deviate from the design intent and create risk for people, equipment, or operability problems.

A HAZOP study is completed by a team of people including those from: Operations, Health and Safety, Engineering, and Integrity. It is often lead by an independent facilitator. The HAZOP team will work to:

- Identify the components in the system or process,

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- Consider possible variations in operating parameters,
- Identify failure points or hazards, and
- Use that information to mitigate the hazards, reduce risk and drive process improvements.

At SECURE, Engineering owns the HAZOP process and should be consulted for additional details regarding HAZOPs.

### 3.6. Roles & Responsibilities

#### Senior and Executive Management and Middle Management

- Demonstrate strong visible leadership and commitment to HSE hazard and risk management, and
- Ensure the necessary resources (e.g., capital, people, equipment, training, etc.) are readily available to manage hazards and risks associated with SECURE's operations.

#### Supervisors

- Ensure all hazards at the worksite are identified, assessed, and controlled to reduce the risk of hazards to ALARP,
- Ensure field JSAs and/or SOPs are developed and utilized by the workforce as required (with a focus on critical task activities),
- Verify all employees have received required training, orientation, mentoring, or other forms of instruction in the management of worksite hazards and controls and that they are held accountable to use the controls,
- Review and approve any completed JSAs, SOPs, FLHAs, and Hazard IDs for worksite activities,
- Ensure all contractors working for SECURE follow the requirements of this Element or have in place equivalent or more thorough hazard management process,
- Mentor operational personnel in the identification, assessment, and control of hazards at the worksite,
- Enlist the assistance of the HSE Team when concerns or issues are raised relating to the effective management of hazards at the worksite, and
- Follow the MOC process when a new system, equipment configuration, process is introduced and implemented or when a change to current operations is made.

#### Workers, Contractors, and Subcontractors

- Complete all activities and tasks in accordance with hazard and risk management requirements identified in this Element,
- Attend required training for management of hazards in the workplace,
- Participate in development and review of JSAs and SOPs,
- Follow the HSEMS for hazard management in the worksite, including but not limited to hazard assessments, procedures, use of necessary PPE and documentation,
- Complete FLHAs and Hazard IDs for worksite activities as needed,
- Inform supervisor of any issues relating to inadequate or improper hazard management, up to and including stopping work to address potentially serious and life-threatening situations,
- Not perform any work that they feel is unsafe and immediately report any unsafe conditions or acts to their supervisor,
- Know and understand the three rights and obligations of every worker (Right to Know, Right to Refuse unsafe work and Right to Participate in HSE activities), and
- Report hazardous work conditions, practices or acts encountered on the worksite.

#### HSE Team

- Develop and maintain Hazard and Risk Assessment Tools appropriate for the business,

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- Provide guidance and support on determining and prioritizing hazards considered to be the most critical,
- Monitor the implementation of the hazard assessment and control program and ensure field operations are compliant with the program, and
- Assist in the education, mentorship, and training of personnel in hazard management.

### 3.7. Related Documents

The following documents are available for use in conjunction with this Element:

- [Hazard and Risk Management Standard](#)
- [Risk Matrix](#)
- Job Task Inventory
- [Pre-Job Hazard Assessment \(PJHA\)](#) for project work
- [Job Safety Analysis \(JSA\)](#)
- [Field Level Hazard Assessment \(FLHA\)](#)

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## ELEMENT 4: TRAINING & COMPETENCY

The Training and Competency Element outlines the training, skills, and qualifications necessary to provide supervisors and workers with the knowledge and experience required to safely conduct SECURE’s day to day operations. Some training and competencies are core and common to all SECURE’s operations while others are specific to a Division or even a specialized task within a line of business. Training and competency requirements may be determined by regulatory requirements, SECURE’s internal standards, or industry best practices.

SECURE will ensure no worker is permitted to work unless the worker:

- a. Has been suitably trained and with sufficient experience to safely perform the work in compliance with applicable legislation, or
- b. Is under close and constant supervision.

### 4.1. Qualifications

SECURE will define the skills, knowledge, training, and experience needed to safely and successfully perform day to day operations in compliance with regulatory requirements and to support internal requirements. Qualifications vary depending on position and may include:

- Licenses,
- Training certificates,
- Internal training course completion,
- Competency verification and certification,
- Diplomas or degrees, and/or
- Customer mandated training requirements.

During the recruiting and hiring process, Human Resources (HR) support business leaders in vetting qualifications. They are also responsible for verifying credentials. As a condition of employment, new hires must also be willing to:

- Participate in alcohol and drug (A&D) testing, if requested,
- Undergo a background check, if requested,
- Complete a pre-employment medical exam, if requested,
- Undergo physical demands testing, if requested, and
- Willing and able to obtain all required safety certification training.

The application and recruiting process provides detailed background information to allow proper evaluation of prospective candidates.

### Competency

Competency is a combination of knowledge, understanding, and skill; the appropriate level of competence cannot be acquired simply by attending a training session. Understanding and skill are acquired by in the field experience. Experience and training are essential to establishing and sustaining a safe and injury free worksite. The following components are to be considered when evaluating competency:

- Experience,
- Level of knowledge,
- Training,
- Capability to perform, and
- Competency assessment.

At SECURE, our view of competency involves the continuous assessment of training and development needs against a person’s responsibilities, abilities, and critical activities. The individual gathers evidence of competence, behaviour, and personal development for health and safety. This process enables a continuous improvement loop that feeds back into training and development activities that ensure evaluating competency is an ongoing career cycle process.

## 4.2. Health & Safety Orientation

Employers are obligated by both OHS and OSHA legislation to provide employees with the training necessary to perform their tasks safely and competently. All new employees will receive a Corporate Safety Orientation that is common to all Divisions and reflects SECURE’s HSEMS.

The primary function of the orientation is to clarify SECURE expectations for employees, contractors and visitors when working at or attending SECURE locations, ensuring responsibilities are understood.

### 4.2.1. Corporate Safety Orientation

The Corporate Safety Orientation is required for all employees, including those in non-safety sensitive positions, and contractors. The Corporate Safety Orientation is a general health and safety orientation which must be completed within the first week of being hired as part of SECURE’s on-boarding program. The orientation familiarizes new employees with SECURE’s HSE policies so work activities can be carried out in a safe and efficient manner. Direct supervisors of new employees are responsible for providing the Corporate Safety Orientation and answering any questions.

This orientation will include the following:

- Introduction to SECURE,
- Safety orientation overview,
- About SECURE,
- Safety goals,
- Vision, Purpose, Mission and Values,
- Policy acknowledgement, including HSE Policy, Alcohol & Drug Policy, and discipline procedures,
- Health and safety roles and responsibilities,
- Management responsibilities,
- Company general rules,
- Applicable health and safety legislation,
- SECURE’s Life Saving Rules,
- Emergency response plans,
- Incident reporting and response to incidents and near misses,
- Hazard identification and reporting, and
- PPE.

### 4.2.2. Division Safety Orientation

A Division Safety Orientation may be developed for employees, and contractors who will be completing tasks in the field. The Division Safety Orientation will expand on the Corporate Safety Orientation to include specific requirements such as certification. Components of those programs may vary based on the type of work that they are performing and the associated hazards and controls.

### 4.2.3. Site-Specific Orientation

Site-Specific Orientations include all offices, facilities, well sites, and project sites. All employees, contractors, and visitors are required to receive the Site-Specific Orientation. This orientation at a minimum, will include a review of:

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- First aid, eye wash, and automatic external defibrillator (AED) locations,
- PPE requirements,
- Site-specific hazards and controls, and
- Site-specific emergency response plan including alarms, evacuation routes, and muster points.

Visitors at any SECURE location must be under the constant supervision of SECURE personnel.

### 4.3. Training Matrix

SECURE will identify the knowledge, skills, training, qualifications and/or experience necessary to achieve SECURE’s HSEMS objectives. This includes the requirements of SECURE’s HSE Policy and takes into consideration:

- Identified corporate and operations specific hazards/risks,
- Legal and other requirements, and
- Objectives and targets.

A Training Matrix will be developed with consultation from operations stakeholders for each Division. The Training Matrix will include Corporate HSE and Commercial transportation training requirements, where applicable, and list courses for various positions. Training courses may be delivered internally and externally and will be tracked.

The HSE Team, in conjunction with the Operational Teams they support, will implement training programs or other activities to address identified training needs. The programs will ensure the ongoing competency of SECURE employees and contractors working on SECURE’s behalf.

### 4.4. Job Specific Training & Competency Program

#### 4.4.1. Short Service Worker Program

Employees that are new to SECURE or transferred within SECURE will receive coaching and training. New employee training will meet the minimum requirements of the Short Service Worker Program as outlined in the Short Service Worker Standard. The program will consist of the following components, at a minimum:

- Identification of core competencies for each position, and
- Documentation and sign-off on core competencies as they are completed.

The following conditions apply to any employees that are new to SECURE or new to their current position/role or operating location:

- Direct supervision is required for all new employees until they have been deemed competent on a specific task, at which point the Short Service Worker can complete that task without direct supervision by another competent worker, and
- Under no circumstances will a Short Service Worker be permitted to work alone prior to being deemed competent in all job tasks applicable to the position.

Key positions, responsibilities and core competencies shall be identified and managed within each Division.

#### 4.4.2. Competency Assessment

SECURE’s safety culture is built on the premise of “Go Home Safe”. A competent workforce is critical to achieving the goal of going home injury free. Legislation stipulates that where work may endanger a worker or where certification is required, the work must be done by a competent worker. SECURE will define competency for each position. To ensure that employees are competent in all tasks that they will perform, SECURE utilizes competency assessments. A competency assessment is completed to assess worker actions

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relative to written procedures and overall job requirements is reviewed by supervisors to identify trends, increase safe behaviors, and update JSAs and/or SOPs as required.

Employees can perform any task requiring a JSA and/or SOP unsupervised provided a competency assessment has been completed and deems the employee competent. Employees without documented competency assessments for tasks must be directly supervised while performing the task by another worker that has been deemed competent.

## 4.5. Documentation & Communication

Training requirements for SECURE employees will be tracked and managed the facility/location level. Electronic and/or paper (electronic and/or paper) copies of training records will be maintained by all employees and must be accessible at all times.

Contractor competency and training requirements will be identified through the contractor management process. Training records (electronic and/or paper) that demonstrate contractor conformance with training and/or competency requirements will be provided upon request.

All records associated with HSE competency and training shall be retained for three (3) years past the expiry of the document. For records without an expiry, they must be kept for three (3) years beyond the employee's employment with SECURE.

## 4.6. Roles & Responsibilities

### Senior and Executive Management

- Demonstrate strong, visible leadership and commitment to training and competency, and
- Ensure programs are in place for training and competency.

### Middle Management

- Demonstrate strong, visible leadership and commitment to training and competency,
- Ensure programs are in place for training and competency, and
- Ensure resources required for competency are available.

### Supervisors

- Demonstrate strong, visible leadership and commitment to training and competency,
- Verify all employees are properly trained to perform their jobs safely, and training records are readily accessible,
- Identify annual training budget, and
- Mentor, observe, and provide feedback to individuals and contractors progressing through orientation and competency programs.

### Workers

- Complete all activities and tasks in accordance with training and competency requirements identified in this Element,
- Inform supervisor of any issues relating to inadequate or improper training or competency, up to and including stopping work to address potentially serious and life-threatening situations, and
- Ensure all required training certifications are kept current.

## 4.7. Related Documents

- [Training and Competency Standard](#)
- [Short Service Worker Standard](#)
- Training Matrix

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- Competency Assessment
- Job Task Observation

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## ELEMENT 5: INSPECTIONS

The Inspections Element outlines the processes for monitoring and measuring SECURE’s health and safety program. This Element establishes the methods and expectations for both formal and informal inspections. Through regular inspections, worksite conditions and work procedures can be monitored to ensure that safety standards and regulatory requirements are being followed. Inspections help to identify hazards before they become problems by revealing where improvements to equipment, work procedures, worker training and worksite conditions are needed.

### 5.1. Inspections

Inspections will be used to record and document potential deficiencies within SECURE’s HSEMS and should evaluate the following:

- Hazards or potential hazards,
- Facilities, project sites, buildings, tools, and equipment,
- Worksite integrity,
- Environmental releases,
- Compliance with regulatory requirements, and
- Conformance to the HSEMS.

Inspections may be completed by all levels of SECURE employees and contractors and will take the following formats:

- Formal Inspections are planned inspections that are documented using an inspection document. Formal inspections are specific to the worksite, activity, tool, piece of equipment, or a material and are designed to meet a particular HSEMS and/or regulatory requirement,
  - Any deficiencies noted during the formal inspection will be documented on the original inspection form with specific corrective actions and assigned responsibilities. Corrective actions identified during a formal inspection will be recorded and closed out,
- Informal inspections are ongoing visual inspections of the worksite without documentation. These inspections are conducted on an ongoing basis and may involve all levels of the organization, and
  - If any deficiencies are noted during the informal inspection, they will be recorded in the Incident Management System (IMS) as an inspection, incident, near miss, Hazard ID, or observation depending on the severity.

*Note: If there is imminent danger during an inspection, stop work in the immediate area, remove all affected person(s) from the unsafe condition and then notify the supervisor. All imminent danger situations will be reported, investigated, and corrective actions implemented prior to resuming work.*

### 5.2. Types of Inspections

- Facility and worksite,
- Safety and environmental,
  - This may include site safety equipment such as first aid kits, eye wash, or emergency showers. It may also include HSE Team inspections, such as a review of the HSEMS system at site level as well as a tour of the facility/worksite,
- Vehicle and/or equipment,
  - This will include inspection of company light duty vehicles, commercial transport vehicles, powered mobile equipment, or cranes,
- Tools and/or PPE,

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- This may include inspection of hand or power tools, rigging/lifting gear, personal harness, SCBA/SABA, or personal gas monitors.

### 5.3. Inspection Type & Frequency

The frequency and responsibility for inspections is outlined in the following table.

Type of Inspection	Frequency	Responsibility
Office	Quarterly	Worker/Supervisor/Middle Management
Facility	Daily/Weekly	Worker/Supervisor
	Monthly	Supervisor/Middle Management
Project Worksite	Weekly	Worker/Supervisor
Tools and PPE	Pre-use/Monthly	Worker/Supervisor
Powered Mobile Equipment	Pre-use and as per manufacturer specifications	Worker/Supervisor
Site Safety Equipment	Monthly	Worker/Supervisor/Middle Management
Vehicle Inspection	Pre-use (informal)/Monthly (formal)	Worker/Supervisor
Commercial Unit (CVIP)	Annual	Maintenance Supervisor
HSE Inspection	Per management direction	HSE Team/E&R Team
Leadership Site Observation	Per Site Visit (informal or formal)	Middle/Senior Management

Table 2 Inspection Frequency Matrix

### 5.4. Preventative Maintenance

SECURE’s Preventative Maintenance Program helps to prevent equipment or instrumentation failure. This is achieved through a planned, effective program of inspection, servicing, testing, and replacement of systems and components to optimize the life expectancy of our equipment and eliminate hazards associated with equipment deficiencies. The program includes routine cleaning, lubricating, testing calibration and adjusting, checking for wear and tear, and replacing components to avoid failures.

In order to establish an effective, efficient, planned, preventative maintenance system, an inventory of all equipment must be completed, and a maintenance schedule established in accordance with manufacturer specification and legislative requirements.

Operational components of SECURE’s Preventative Maintenance Program include:

- An inventory of critical equipment and parts,
- An inventory of all equipment with moving or rotating parts,
- An inventory of all instrumentation,
- A maintenance schedule in accordance with manufacturer specifications and regulatory/legislative requirements, and
- Inspection and maintenance records (must be kept for as long as equipment is in use or as required by regulation).

Any equipment found to be deficient or defective during an inspection, must be removed from service until repaired or replaced.



## 5.5. Roles & Responsibilities

### Senior and Executive Management

- Demonstrate strong, visible leadership and commitment to the inspection process, and
- Foster an atmosphere of support for the inspection program with the Divisions and operations in general.

### Middle Management

- Demonstrate strong, visible leadership and commitment to the inspection process,
- Ensure programs are in place for inspections, and
- Ensure resources required for inspections are available.

### Supervisors

- Demonstrate strong, visible leadership and commitment to the inspection process,
- Provide adequate instruction to employees and contractors on inspection processes, and
- Verify inspections are conducted, assigned, documented, and corrective actions are closed out.

### Workers

- Complete all activities and tasks in accordance with inspection requirements identified in this Element, and
- Inform supervisor of any non-conformance or regulatory non-compliance events identified during routine operations, or during inspection activities.

## 5.6. Related Documentation

- [Inspections Standard](#)
- Preventative Maintenance Program

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## ELEMENT 6: INCIDENT MANAGEMENT

The Incident Management Element provides a consistent and systematic approach to report, record, and investigate incidents. Incidents are reported and investigated because SECURE has:

- A moral responsibility to care for its workforces and the environment,
- A legal responsibility to take all reasonably practical steps to protect the individual’s health and safety, and
- A duty to investigate incidents when they do occur to identify root cause and thus prevent recurrence.

All incidents must be reported to the appropriate supervisor immediately after initial steps have been taken to stop, control, or mitigate the immediate risk of the incident. All incidents must be reported in the Incident Management System (IMS) within 24 hours of the occurrence. Any injury incidents must be reported to the appropriate HSE Team member immediately. All employees and contractors must fully cooperate with all investigations.

### 6.1. Incident Management Process

SECURE’s Incident Management Process Flow is depicted in the following figure. Refer to the Incident Management Standard for additional information.

#### 6.1.1. Respond

- Supervisors will stop work and conduct a rapid and accurate assessment of a situation to establish the appropriate response (e.g., emergency or incident),
- Emergencies will be reported and managed in accordance with the worksite or facility ERP, and
- In the event of injury/illness, refer to the Injury Reporting Flowchart and the associated Injury Reporting Package and ensure prompt and immediate care to an injured person(s) will be provided.

When an incident occurs, the initial response must ensure the safety of workers, the site, the public, the environment, and the assets to prevent further harm. All incidents (SECURE incidents and third party incidents) must be reported immediately to the manager or supervisor, who is responsible to respond to the incident. The required response actions are summarized in the Incident Management Standard.



Figure 5 Incident Management Process Flow

#### 6.1.2. Notify

- Workers will immediately report an incident or near miss to their supervisor regardless of the severity, or potential impact of the incident. Failure to report an incident or near miss (including deliberate or malicious interference with an investigation) is a serious offence and subject to disciplinary action,
- Supervisors will notify the appropriate HSE Team member and Management of incidents via telephone as soon as practicable according to the Incident Reporting Process Flow (Figure 5). The First Report will be entered in the IMS within 24 hours of the incident, and
- Incidents may need to be reported externally to the regulators if applicable.

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### 6.1.3. Investigate & Determine Root Cause

The purpose of investigations is to determine immediate and root cause(s), so that corrective measures can be put in place to prevent similar incident. All incident investigation reports must be completed in the IMS.

- Investigations should begin as soon as possible, after the injured person(s) have been cared for, and all of the potential hazards are removed to ensure incident details are fresh in the minds of the individuals involved and physical evidence remains intact,
- Systematic Cause Analysis Technique (SCAT) is used to identify the contributing and underlying factors,
- Participation and cooperation from all levels of employees, including managers, supervisors, HSE Team, witnesses to the incident, and others who might bring specialized skills or knowledge to the investigation process is essential for investigations, and
- The level of investigation will be based on the Risk Rating assigned but is subject to the decisions of the Division Health and Safety Manager. Incident investigations will include the participation of supporting departments to help determine causes and trends.

### 6.1.4. Develop Corrective Actions

Corrective actions will be assigned for all incidents and are designed to minimize the severity of an ongoing incident and prevent recurrence of a similar event.

Corrective actions will follow the hierarchy of controls and focus on eliminating the hazard. If elimination is not reasonably practicable or not achievable, the hazard will be first controlled through substitution or engineering, then administrative controls, and finally PPE as a last line of defense. All corrective actions will be verified to ensure they do not introduce a new hazard or unmanaged hazard. Corrective actions will be assigned to a responsible person, with a specified due date.

### 6.1.5. Review & Approve

The completed investigation and corrective action plans are reviewed and approved to ensure that the incident investigation process was effective in determining what happened and how to prevent it from happening again.

### 6.1.6. Learning & Sharing

The results of incident investigations are to be communicated to employees (including contractors and visitors as applicable) with the intention of avoiding similar types of incidents. Immediate corrective actions, incident learnings, best practices, and trends will be shared with the organization using the tools itemized in Element 2: Communication.

## 6.2. Health & Safety Statistics

Safety statistics are maintained at the corporate level and are used to monitor the effectiveness of the HSEMS. SECURE tracks both proactive and reactive efforts to monitor the results of the health and safety program and guide future decisions towards reducing incident frequency rates. Refer to the Incident Management Standard for further information.

## 6.3. Roles & Responsibilities

### Senior and Executive Management

- Take ownership and responsibility for incidents in their functional area, and
- Allocate and make available the necessary time and resources for the required level of investigation and support corrective actions.

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## Middle Management

- Provide support to supervisors and workers involved in the incident,
- Work with all stakeholders to provide immediate corrective actions,
- Allocate and make available the necessary time and resources for the required level of investigation and corrective actions,
- Ensure client reporting requirements are met,
- Confirm contractor's Incident Reporting and Investigation Program meets the requirements outlined in this Element or that contractors understand their responsibilities,
- Arrange post-incident A&D testing in conjunction with HR and HSE,
- Participate in incident investigations, and
- Confirm corrective actions are successfully completed on time and verify the action(s) have corrected the deficiencies.

## Supervisors

- Ensure workers (including contractors) are aware of their responsibilities to report all incidents without delay,
- In the event of an incident, stop work and secure the scene to preserve evidence and prevent any further escalation,
- Provide prompt and immediate care to an injured employee and follow the ERP,
- For all injury/illnesses complete Injury Reporting Package with the SECURE's Occupational Health & Wellness (OHW) Team and HSE Team,
- Arrange post-incident A&D testing in conjunction with HSE and HR (as per the Alcohol & Drug Policy).
- Ensure the incident scene remains undisturbed until appropriate authorization has been given for re-commencement of normal activities,
- Identify and retain witnesses and workers (including contractors) involved in the incident until the lead investigators determine their assistance is no longer required,
- Make records available to the appropriate governing authorities upon request, and
- Communicate incident learnings to workers and contractors.

## Employees and Contractors

- Plan and perform work in a manner that prevents incidents,
- Stop work and verbally report without delay to their supervisor any incidents and near misses which they witness or discover, or in which they are involved, and
- Participate in the incident investigation if requested.

## HSE Team

- Provide support on the interpretation and application of these procedures,
- Provide general support to operations and HSE as it relates to the Incident Management process,
- Conduct investigation within appropriate timeframe(s) with participation from operations,
- Report all injuries/illness to SECURE's OHW Team,
- Support operations with Injury Reporting Package,
- Follow up and ensure investigation/corrective action completion,
- Update HSEMS (where required) based on investigation findings, and
- Distribute Alerts throughout SECURE for incident learning.

## 6.4. Related Documents

The following documents are available for use in conjunction with this element:

- [Incident Management Standard](#)

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- [Risk Matrix](#)
- [Injury Flowchart](#)
- [Incident & Near Miss Reporting Flowchart](#)
- [Incident Statement](#)
- [Injury Reporting Package](#)
- [Alcohol & Drug Policy](#)
- [Progressive Discipline Policy](#)

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## ELEMENT 7: EMERGENCY MANAGEMENT

The purpose of the Emergency Management Element is to establish requirements for SECURE’s response to an emergency. This Element applies to all SECURE operations and provides information on ownership, accountability, planning, direction, and the coordination of response actions. All ERPs (Core and Site-Specific) developed in accordance with this Element will meet applicable regulations for fixed facilities and projects. Client-specific emergency response requirements will also apply.

### 7.1. Emergency Preparedness

SECURE has adopted and implemented the Incident Command System (ICS) at all levels within the organization. ICS is a comprehensive and practical system widely used nationally and internationally by both government and industry sectors to manage emergencies. It is a standardized, on scene, management system used for all types of emergency and non-emergency events. SECURE has adopted the following core and consistent incident priorities for all emergencies:



Figure 66 Incident Priorities

To achieve this, the Emergency Management Program (EMP) will:

- Be built on the foundation of prevention and mitigation, preparedness/training, response, and recovery,
- Meet and exceed all regulatory and legal requirements,
- Consider all emergency scenarios and their associated hazards when identifying and mitigating risks,
- Ensure SECURE employees and contractors have appropriate emergency preparedness and response training,
- Will identify potential emergency scenarios applicable to the organization’s operations,
- Ensure standardized objectives during a response, and
- Ensure emergency responses are coordinated with regulator first responders, government agencies, local authorities and communities to promote unified command.

### 7.2. Emergency Response Plan

The SECURE Emergency Response Plan (ERP) will be split into two sections, Core and Site-Specific. The Core (Corporate) section will be consistent across all business lines and contains information that applies to the entire organization and outlines the Incident Management Team (IMT) and Corporate responders that comprise the Incident Support Team (IST). Provincial/regulatory requirements including applicable government agencies, local/regional authority’s roles and responsibilities, as well as company-wide and local support agreements with external agencies and mutual aid partners will be contained in the Core.

The Site-Specific section outlines all area specifics including:

- Operations overview,
- General area overview,
- Contact lists for SECURE personnel,
- External contact lists (government, local authority, first responders, support services, etc.),

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- Area user information,
- Site equipment and processes,
- Technical data,
- Maps, and
- Confidential resident information.

Together the Core Sections, and a Site-Specific Supplemental Section enable SECURE to carry out an effective response. Specialized emergency response plans called Functional Support Plans (FSP) may be presented in separate documents when required.

### 7.3. Related Documents

- SECURE Emergency Response Plan
- Emergency Response Site-Specific Template
- Emergency Management Standard
- [Incident Management Standard](#)

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## ELEMENT 8: RULES

The Rules Element outlines SECURE’s rules, including the core 8 Life Saving Rules (LSRs), and key health and safety programs that are applicable to all Divisions.

### 8.1. Life Saving Rules

LSRs are not intended to address all risks and hazards; they are meant to draw attention to the activities most likely to lead to a fatality, and the life-saving actions over which an individual has control. The LSRs are intended to support existing management systems. They are not intended to replace company management systems, policies, safety training programs, operating procedures, or work instructions, and rely on this framework.

The LSRs are based on areas of high risk and high consequence in our operations. They are inherent to our business and applicable to all employees, and contractors. Each rule consists of an icon and simple life saving actions individuals can take to prevent a work-related fatality.



#### Drive Safely

Wear seatbelts, obey speed limits, only use hands-free devices, and follow journey management where the risks require.



#### Have a Safe Work Permit

Work with a valid work permit when required.



#### Isolate Energy Sources

Verify isolation of energy sources before work begins.



#### Control Entry to Confined Spaces

Obtain authorization before entering any confined or restricted space.



#### Manage Ground Disturbances

Obtain authorization before starting ground disturbance or excavation activities.



#### Work Safely at Heights

Protect yourself against a fall when working at heights (greater than 1.8 m (6 ft)).



#### Avoid the Line of Fire

Position yourself in a safe zone in relation to moving and energized sources. Follow safe lifting operations and do not walk under suspended loads.

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## Manage Exposure to Hazardous Substances and Mixtures

Protect yourself against the exposure to hazardous substances and mixtures using the hierarchy of hazard control.

## 8.2. General Safety Rules

In addition to the LSRs, the General Safety Rules are important to reduce the risk of incidents and provide clear guidance on appropriate safe behaviour.

### Incidents

- All unsafe acts, conditions, incidents, workplace illnesses, and injuries, including "near misses" will be immediately reported to the supervisor, and
- First aid treatment is to be obtained promptly for all injuries and recorded.

### Personal Conduct

- Possession or use of alcohol or drugs at work is strictly prohibited and is subject to disciplinary action up to and including termination,
- Theft, vandalism, harassment, violence, or any other abuse is prohibited and is subject to disciplinary action up to and including termination,
- Fighting and horseplay is prohibited, and
- Firearms are strictly prohibited on all SECURE sites and facilities unless specific written authorization is granted for specific situations such as wildlife monitoring.

### Smoking

- Smoking and vaping in designated areas only, and
- Smoking is prohibited when refueling vehicles or equipment or when handling any flammable substance.

### Housekeeping and Hygiene Facilities

- Housekeeping is mandatory, every worker will keep their work area clean, neat, and orderly,
- All access and egress points (e.g., stairs, walkways, etc.) must be kept clean. Access to safety equipment must be free of obstructions,
- All entrances and exits must be kept free of ice and snow,
- All fire lanes, access roads and evacuation routes must be kept clear of equipment, and parked vehicles,
- Always wash hands before eating, drinking, smoking, and after using toilet facilities, even if you have been wearing gloves, and
- SECURE will provide facilities (e.g., shelter, eating areas, toilets, break areas, first aid, etc.) as necessary. Potable drinking water, toilet, and hand washing facilities will also be made available.

### Electronics

- Personal stereo headsets are not approved for hearing protection and are not permitted in any operating area, and
- Electronic equipment other than provided or authorized by SECURE or client is not permitted on the worksite. This includes cell phones, music players, tablets, and other similar devices.

### Equipment and Tools

- In the presence of rotating equipment, hair must be trimmed or secured to not extend past the outside of the collar,

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- Jewelry must be removed if it has the potential to constitute a hazard during the work or job task (e.g., working around rotating equipment),
- Loose-fitting clothing such as hoodies, and scarves must not be worn,
- After use, always return equipment and tools in a safe condition to their proper location,
- Do not use compressed air to blow dust or other material from a workers' clothing or body, and
- Do not use any defective equipment or tools. Tagout defective equipment or tools and report it to your supervisor.

### Personal Protective Equipment (PPE)

- PPE must be inspected prior to each use,
- Where respiratory protective equipment is required, facial hair must be neatly trimmed so it will not interfere with obtaining a seal on air masks and respirators, and
- Contact lenses must not be worn in atmospheres containing volatile vapours, high particulate matter, intense heat or dryness, excessive wind, or where there is the likelihood of chemical splash.

### Machinery and Powered Mobile Equipment

- Always wear an approved seatbelt when required,
- Only authorized competent personnel will operate powered mobile equipment and power tools. This includes pneumatic, power, and explosive activated tools,
- Riding on equipment is prohibited. Use the designated seat. No person will ride any hook, hoist, bucket, or any other material handling equipment, and
- Do not use any defective machinery or powered mobile equipment and report it to your supervisor.

### Sign-In and Sign-Out

- Workers must sign in and out with the worksite supervisor or designate each shift, and
- Workers must not leave the worksite without first advising the supervisor.

### Guardrails, Platforms, and Barricades

- Ensure all signs, barriers, and flag persons necessary to protect workers and the general public from injury are available (e.g., barricades at public areas),
- Install suitable fencing or barricades where trenching or excavating work areas are accessible to the general public or wildlife,
- Fence and/or cover open sumps on work sites to protect against accidental entry by workers, the public, or animals, and
- Ensure all work areas, walkways, and platforms elevated over 1.8 m (6 ft) (whether permanent or temporary) are encompassed by approved guardrails.

## 8.3. Fitness for Duty

Commitment to the health, safety, and well-being of our employees, our customers, the public and the environment is essential to SECURE's business.

At SECURE fitness for duty is defined as the physical, mental, and emotional condition that allows an individual to fulfill their tasks and the opportunity to excel at their jobs.

Key elements that support fitness for duty for SECURE employees include:

- Complete a pre-employment medical exam, if requested,
- Undergo physical demands testing, if requested,
- Alcohol & Drug Policy,
- Employee Benefits Program,

- Employee and Family Assistance Program,
- Employee Extended Health Care, and
- Fatigue Management.

All individuals are required to show up fit for duty at the start of each shift or workday. If individuals are not fit for duty or if they observe that a coworker, contractor, or vendor is not fit for duty they have the responsibility to identify that as a potential hazard and report it to their direct supervisor.

A standard for Fatigue Management has been developed to supplement all related HR documentation on Fatigue Management.

## 8.4. Modified Work Program

SECURE recognizes that when an injury occurs to a worker the focus must be on the full recovery of that worker. The longer a worker is off work due to injury, the less likely the chance that they will ever return to their pre-injury role. Occupational Rehabilitation studies and programs have shown that employees who are engaged in some form of paid work recover almost twice as quickly as employees who are left to recover on their own. Modified work will be offered, wherever possible to employees who are unable to return to their regular duties following a workplace injury or illness.

The SECURE Modified Work Program/Claims Management is a key part of our commitment to our workers wellbeing. This program provides workers with increased opportunities for a full and speedy recovery while maintaining income through participation in work duties that are in line with any restrictions that may be imposed on the worker due to his/her injury. All injured workers will be offered and are expected to participate in modified/restricted work duties through the SECURE Modified Work Program.

## 8.5. Related Documents

- [Driver & Vehicle Safety Standard](#)
- [Fatigue Management Standard](#)
- [Occupational Injury Management – Modified Work Program Standard](#)
- [Code of Business Conduct](#)
- [Alcohol & Drug Policy](#)
- [Progressive Discipline Policy](#)

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## ELEMENT 9: OPERATIONAL CONTROLS

The Operational Controls Element describes requirements that ensure operational controls are implemented, communicated, and maintained for activities, products, and services with potential to cause significant HSE impact.

### 9.1. Identify Controls

Identification of the corporation's operational controls for its inventory of activities and tasks occurs as part of the risk control process outlined in Element 3: Hazard & Risk Management. Managers or supervisors shall use hazard assessments and procedures to plan work. Hazard assessments and procedures shall be reviewed to identify hazards associated with a task, identify appropriate hazard controls, and assess risk.

Operational controls shall be developed and implemented with consideration of applicable legal and other requirements associated with tasks and shall adhere to the control hierarchy outlined in the Hazard Control Hierarchy (Figure 4).

### 9.2. Establish Controls

The HSE Team shall establish operational controls for corporate-wide HSE risks including but not limited to:

- COPs, standards, and forms in support of the HSE Policy and HSEMS objectives.

The responsibility of developing operational hazard assessments and procedures covering critical tasks and specific requirements not outlined in corporate standards rests with the Divisions. Division hazard assessments and procedures shall meet the requirements of the HSEMS, at a minimum, and follow the document control requirements specified in Element 12: Document Management & Control. Hazard assessments and procedures are valuable step-by-step instructions on how to perform a task correctly. They allow for consistent operations and are required to minimize hazards. The HSE Team will support managers or supervisors in the development of Division or operational controls.

### 9.3. Implement Controls

COPs and standards shall be maintained by the HSE Team and implemented at worksites by managers or supervisors. Division level procedures shall be implemented and maintained at operational worksites by managers or supervisors.

### 9.4. Monitor & Measure Controls

Operational controls shall be monitored, evaluated, and reviewed as required to ensure proper implementation and effectiveness.

### 9.5. Documentation & Communication

Standards, hazard assessments and procedures shall be maintained in accordance with Element 12: Document Management & Control. The HSE Team shall communicate COPs, standards and other operational controls to employees, contractors, and those working on SECURE's behalf. Managers and supervisors must:

- Communicate applicable Division level procedures and other operational controls to employees, contractors, and those working on SECURE's behalf at each worksite, and
- Communicate relevant COPs, standards, procedures, and worksite level operational controls to visitors, where applicable, and to contractors through the procurement process, contract documents, and/or during project start-up meetings.

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## 9.6. Roles & Responsibilities

### Senior and Executive Management and Middle Management

- Demonstrate strong visible leadership and commitment to HSE operational controls.

### Supervisors

- Develop Division hazard assessments and procedures,
- Implement and communicate Corporate, Division, and Operations procedures to employees, contractors, and visitors, where applicable, and
- Maintain, monitor, evaluate, and review Division and worksite operational controls.

### Employees

- Complete all activities and tasks in accordance with HSE operational control requirements identified in this Element, and
- Inform supervisor of any issues relating to inadequate or improper operational controls, up to and including stopping work to address potentially serious and life-threatening situations.

### HSE Team

- Establish operational controls (e.g., COPs, standards, etc.) in support of the HSEMS,
- Support managers and supervisors in the development of Division hazard assessments and procedures, and
- Maintain, monitor, evaluate, and review corporate operational controls.

## 9.7. Related Documents

- Operational Control Index

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## ELEMENT 10: ENVIRONMENT

The Environment Element describes requirements that ensure environmental controls are implemented, communicated, and maintained for activities, products, and services with potential to cause significant environmental impact. As part of SECURE’s HSEMS, this Element addresses the actions SECURE takes to mitigate impact associated with development activities and operations, while maximizing the value of the resources.

### 10.1. Identify Controls

Identification of SECURE’s environmental controls for its inventory of activities and tasks occurs as part of regulatory requirements and the risk control process outlined in Element 3: Hazard & Risk Management. Environmental controls will be developed and implemented with consideration of applicable legal and other requirements associated with the tasks.

### 10.2. Establish Controls

The E&R Team will establish environmental controls for corporate-wide HSE risks including but not limited to:

- Standards, procedures, and forms to cover situations where their absence could lead to deviation from the HSEMS objectives.

The responsibility of developing procedures and/or hazard assessments not outlined in corporate standards rests with the Divisions. Divisional hazard assessments and procedures will meet the requirements of the HSEMS, at a minimum, and follow the document control requirements specified in Element 12: Document Management & Control. The E&R Team will support Operations Managers in the development of divisional or environmental controls.

### 10.3. Monitor & Measure Controls

Environmental controls will be monitored, evaluated, and reviewed periodically to ensure proper implementation and effectiveness. SECURE’s compliance program includes regular third party and internal reviews of facilities, audits to meet regulatory approval and technologically advanced facility design to mitigate any environmental impact. SECURE works with government regulators, sharing input and ideas to encourage effective regulatory policy development concerning waste and environmental management.

### 10.4. Related Documents

- Environment & Regulatory Index

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## ELEMENT 11: CONTRACTOR MANAGEMENT

The Contractor Management Element establishes SECURE’s methods for the prequalification, and onsite management at SECURE worksites. The intention is to achieve consistency across operations and enhanced HSE performance.

### 11.1. Prequalification

Contractors must be safety prequalified before they can perform physical work on a SECURE site or haul on behalf of the company (e.g., equipment, materials, waste). The prequalification process provides SECURE with a contractor safety performance history, ensures the contractors carry relevant insurance coverage and meets requirements. Contractor approval is determined based on their status (green, yellow, red, grey) in the Prequalified Contractor List. If the required contractor is not on SECURE’s Prequalified Contractor List, the contractor is required to complete and submit prequalification requirements prior to commencing work.

#### 11.1.1. Prequalification Status

The manager or supervisor will ensure each contractor engaged to perform work on behalf of SECURE has been prequalified and has been assigned an acceptable status. Documentation will be available for audit purposes.

The status for each contractor working at a worksite will be:

- Confirmed by the manager or supervisor for the duration that the contractor is onsite. *Note: The expiry period for a contractor’s Worker’s Compensation Board (WCB) coverage and insurance vary by jurisdiction. Ensure these remain valid.*
- Communicated to the worksite by the manager or supervisor.

*Note: Contractors are prequalified to perform certain types of work only (e.g., specific tasks at the worksite). If there is a planned change to a contractor’s scope of work, verification is required that the contractor has been prequalified to perform work under the new scope.*

If the status of the contractor changes prior to or during a project, the required approvals must be obtained, and the contractor must be managed in accordance with the new status.

#### 11.1.2. Contractor Variance

In special circumstances, a variance may be granted to contractors who are not members of the prequalification system. Refer to the Contractor Management Standard.

### 11.2. Onsite Management of Contractors

All contractor activities at a SECURE worksite will be documented as part of the Safe Work Permit and/or Daily Tailgate/Pre-Shift Safety Meetings or the prime contractor’s permitting process depending on project requirements, and any specialty permits as provided for in the HSEMS. According to the status assigned by the SECURE prequalification system, SECURE will manage the contractor as detailed in the Contractor Management Standard.

### 11.3. Roles & Responsibilities

#### Senior and Executive Management

- Demonstrate strong, visible leadership and commitment to the contractor management program, and
- Allocate sufficient resources necessary to support the contractor management program.

## Middle Management

- Monitor compliance of contractors under their direction in accordance with applicable regulatory requirements and this Element,
- Ensure anticipated contractors are on the approved contractors list and communicate the status with supervisors,
- Prior to the start of work, advise all contractors of SECURE’s expectations with respect to HSE, including but not limited to:
  - SECURE hazard and risk management responsibilities,
  - Fitness for work and post-incident A&D testing,
  - SECURE’s LSRs,
  - SECURE incident reporting and investigation process,
  - Any specific requirements imposed by the client or contract relating to HSE, and
  - Any specific requirements which may apply to individual contractors as part of this Element.
- Ensure supervisors understand and implement the requirements of this Element at their worksites, including expectations relating to the specific management of contractors according to assigned status and tasks.
- Verify SECURE worksite supervisory personnel understand the work each individual contractor is prequalified to perform. Any change or deferral to a contractor’s scope of work will be documented.

## Supervisors

- Demonstrate strong, visible leadership and commitment to the contractor management program,
- Provide adequate instruction to employees and contractors on contractor management program,
- Ensure employees and contractor comply with the requirements of this Element,
- Prior to the start of work, confirm each contractor at the worksite has been prequalified as per the SECURE Parameters of the Prequalification process,
- Check the prequalification status assigned to each contractor,
- Monitor and manage contractors so they perform only the work for which they are prequalified,
- Document any planned change to a contractor’s scope of work,
- Collect all completed copies of contractor paperwork (e.g., hazard assessment), and
- Ensure all contractors have been oriented and have participated in safety meeting.

## Employees

- Inform supervisor of any non-conformance or regulatory non-compliance events identified during routine operations.

## Contractors

- Complete and submit all required prequalification documents,
- Perform work in accordance with assigned prequalification status,
- Prior to the start of work, advise their employees of SECURE’s site specific requirements and expectations with respect to HSE, including, but not limited to:
  - SECURE hazard and risk management requirements,
  - SECURE fitness for work and post-incident A&D testing policy,
  - Review SECURE’s LSRs,
  - Be included in, and attend, where required, all pre-shift safety meetings and/or project kickoff meetings, and orientations,
  - Compliance with SECURE’s HSEMS,
  - Review and remain in compliance with the SECURE incident reporting and investigation process, and

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- Notify SECURE of any changes WCB coverage or insurance.

## 11.4. Related Documentation

- [Contractor Management Standard](#)

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## ELEMENT 12: DOCUMENT MANAGEMENT & CONTROL

The Documentation and Control Element provides filing protocols and guidance on document and record retention. Standardized HSE filing protocols ensures that documents and records can be consistently located during inspections, audits and in the event of a serious incident. Document retention guidelines have been developed to ensure regulatory compliance and to provide due diligence. This Element also provides a mechanism for driving continuous improvement within the system and for updates and revisions to the HSEMS.

### 12.1. Documentation

Documentation criteria applies to all levels of the HSE documentation. Documentation includes policies, elements, COPs, standards, procedures, rules, checklists, forms, reports, and any other documents required by the HSEMS. SECURE’s HSE document hierarchy is as follows:

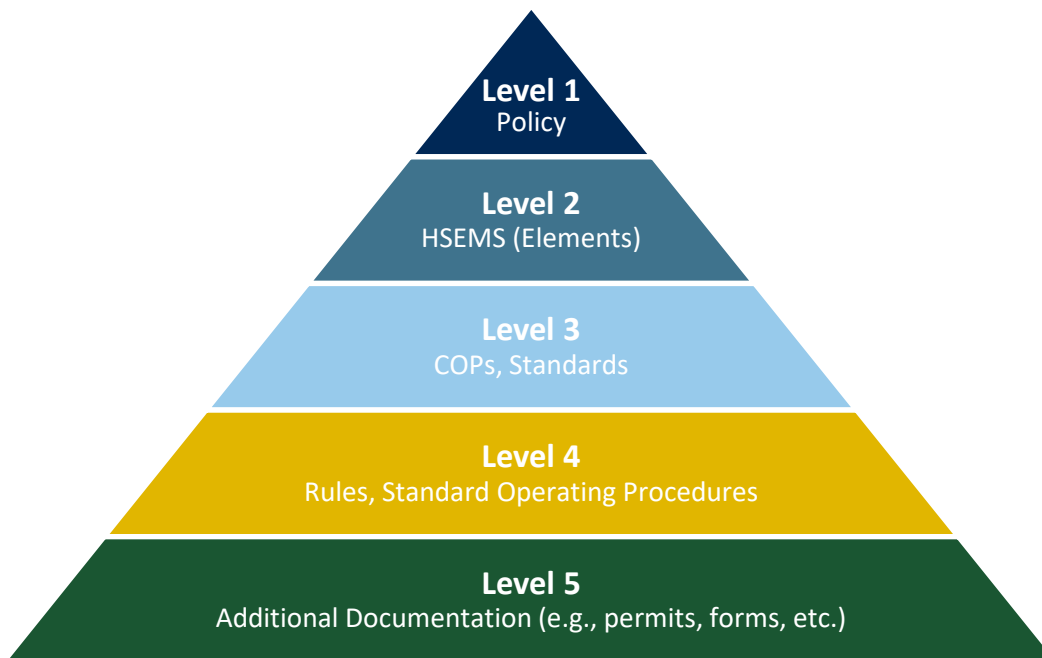


Figure 77 HSE Document Hierarchy

Documents relating to SECURE’s HSEMS are available in hard (printed) and soft (digital) forms. Where there are discrepancies, the digital version will always be considered the most accurate and take precedence. Printed HSEMS documents are considered “uncontrolled”.

#### 12.1.1. Document Naming

All HSEMS related documents will be identified with the following information:

- Title,
- Document Number,
- Date of Original or Revision (Month DD, YYYY), and
- Revision Number.

Table 3 provides guidance on the HSEMS naming structure, where:

- Organizational Owner – Who within SECURE the document applies to,
- Department – Who is responsible for creating and maintaining the document,

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- Document Level – Document type, and
- Document Name – A short description of the document.

Organizational Owner	Department	Document Level
CO – Corporate	HSE – Health, Safety, Environment	POL - Policy
FM – Fluids Management	OPS – Operations	MS – Management System
ES – Environmental Solutions	ER – Environment & Regulatory	STN - Standard
MI – Midstream Infrastructure		SOP – Standard Operating Procedure
		FRM – Form

Table 3 HSEMS Naming Structure

### 12.1.2. Continuous Improvement Process

Every SECURE employee is encouraged to recommend changes for improvement to the HSEMS because it drives continuous improvement. A formal process is followed for making recommendations, reviewing them, approving, or rejecting them and implementing changes.

The process for a recommendation is as follows:

1. Recommendation submitted to the HSE Team using a Document Change Request (DCR) Form.
2. DCR is reviewed by the HSE Team for completeness.
3. The HSE Team submits completed DCR forms to the HS Manager.
4. DCR Committee reviews DCR and either recommends it for approval or rejects the recommendation. Committee communicates outcome to the employee who made the recommendation.
5. HS Managers work jointly to create implementation plans for approved DCR.

The DCR Committee meets quarterly to review all DCRs that are submitted in the previous quarter. If a recommendation is such that it requires immediate review and implementation (e.g., imminent health or safety risk), the HSE Team responsible for it will escalate its review immediately.

### 12.1.3. Document Control & Management

Corporate HSEMS documents will be developed and reviewed by the HSE Team or the HSE Committee. The HSE Team and DCR Committee will consult appropriate stakeholders. Divisional (Operations Division) documents will be developed and reviewed by the Divisional HS Managers in consultation with appropriate Operations Leaders, as required. Only HS Managers and their approved designates can assign document control numbers and publish HSE documents to the HSEMS internal website.

### 12.1.4. Document Retention

HSE records and documents will be maintained in accordance with the timelines provided in the Record Retention Protocol Standard. Digital or paper versions of records and documents are both considered valid. If a document or record is stored digitally there is no need for a paper copy. Wherever practical a digital record is preferred, especially if it is stored on the SECURE network because SECURE’s IT department ensures the network is secured and backed up frequently and can be retrieved.

Documents and records that are confidential or contain sensitive information will be defined, marked, and managed as such so that they are only accessible to authorized users. Legal and HR may be consulted for additional guidance on distribution and retention of certain documents and records to ensure compliance with personal privacy protection laws.

Obsolete documents will be retained by the HSE Team to meet retention requirements but will be removed from all active use by SECURE employees and contractors.

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## 12.1.5. Document Review

Documents will be reviewed to ensure adequacy, suitability, and effectiveness as required. The entire HSEMS, or individual components, may be reviewed at any time if required by changes in legislation, operational requirements, or operational activities. All new and/or revised HSEMS documents will be approved in the HSE Committee or the HSE Team.

## 12.2. Roles & Responsibilities

### Senior and Executive Management and Middle Management

- Demonstrate strong visible leadership and commitment by following all HSEMS document control requirements, and
- Provide all necessary resources to maintain a document control system.

### Supervisors

- Approve HSEMS Division specific documents and processes within their area of operation,
- Verify Division and Business specific documents meet or exceed the requirements of the HSEMS,
- Participate in the review and update of the HSEMS and associated documents as required,
- Ensure HSE documents and records are filed and stored in accordance with the guidance within this Element,
- Implement recommended changes as required, and
- Capture employee or contractor suggestions and recommendations for the HSEMS and COPs, standards, and forms.

### Workers and Contractors

- Comply with the HSEMS and Division specific HSE documentation,
- Manage HSEMS documents and records in accordance with the guidance provided in this Element, and
- Ensure HSEMS documents and records are completed accurately and filed in a reasonable amount of time.

### HSE Team

- Develop, review, maintain and implement the HSEMS,
- Review HSE documents to ensure they meet or exceed the requirements within the HSEMS,
- Assign control numbers for controlled documents,
- Maintain a document control and change log,
- Publish HSE documents to the HSEMS site, and
- Implement document storage and retention requirements.

## 12.3. Related Documents

- Record Retention Protocol Standard
- Document Change Request Form

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## ELEMENT 13: QUALITY MANAGEMENT

*PLACEHOLDER* - SECURE may develop and implement a Quality Management Element in the future.

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## ELEMENT 14: ABBREVIATIONS

Term/Abbreviation	Definition
A&D	Alcohol and drug
AED	Automatic external defibrillator
ALARP	As low as reasonably practicable
COP	Code of Practice
COR	Certificate of Recognition
CVIP	Commercial Vehicle Inspection Program
DCR	Document Change Request
E&R	Environment and Regulatory
EMP	Emergency Management Program
ERP	Emergency Response Plan
FLHA	Field Level Hazard Assessment
FSP	Functional Support Plan
H&S	Health and Safety
HAZOP	Hazard and Operability
HR	Human Resources
HSE	Health, Safety, and Environment
HSEMS	Health, Safety and Environment Management System
ICS	Incident Command System
IMS	Incident Management System
IMT	Incident Management Team
IST	Incident Support Team
JHSC	Joint Health and Safety Committee
JSA	Job Safety Analysis
LSR	Life Saving Rule
MOC	Management of Change
OHW	Occupational Health and Wellness
PJHA	Pre-Job Hazard Assessment
PPE	Personal Protective Equipment
SCAT	Systematic Cause Analysis Technique
TOR	Terms of Reference
WCB	Workers Compensation Board