

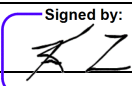
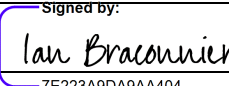
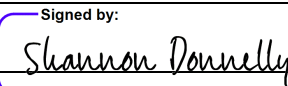


## Contractor HSE Management

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## Contractor HSE Management

REVISION CONTROL SHEET		
Revision	Date Issued (YYYY/MM/DD)	Comments
1	2016	Issued for use
2	2021/12/01	<ul style="list-style-type: none"> <li>-re-write to align with COP Contractor HSE Management Standard</li> <li>-contractor sponsor role and operational control are defined</li> <li>-requirement for HSE risk levels for scopes of work</li> <li>-variance process requiring management approval for contractors who do not meet pre-qualification criteria</li> </ul>
3	2023/12/15	<ul style="list-style-type: none"> <li>-addition of the Operational Control list in Appendix I that aligns with the COP Contractor Management Standard</li> <li>-updated definitions of Contractor, Supervision, Subcontractor and Operational Control.</li> </ul>
4	2025/10/09	<ul style="list-style-type: none"> <li>-removal of the term "partnerships"</li> <li>-aligned with COP Phase 1-8 Contractor HSE Management Standard lifecycle with the addition of phases 7-8 (demobilization and contract close out)</li> <li>- included use of exposure hours as part of risk ranking</li> <li>-inclusion of ISN as part of prequalification review</li> <li>-identified training and competency program review will be part of the prequalification process</li> <li>-removed "preferred" as a capability assessment designation to simplify process</li> <li>-removal of requirement of contractor bridging for prime contractor designation as contractors who are assigned primacy are not subject to phases 2-8 in the program.</li> <li>-added Contractor oversight</li> <li>-inclusion of Safety Leadership requirement for Contractor supervision</li> <li>-inclusion of contractor management program evaluation</li> <li>- removal of RACI chart which was redundant to the responsibilities in the program The employee(s) that has day to day management responsibility for the Contractor is defined as the "supervisor".</li> <li>-updated Appendix A to align with COP Contractor Management Standard and provided clarity</li> </ul>

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## About this Standard

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Purpose	This program is intended to establish minimum requirements and expectations between ConocoPhillips Canada (CPC) and its Contractors for the health, safety and environmental management of Contractors and Subcontractors.
Scope	<p>The scope of this document includes all contracted activities that occur at CPC owned or leased facilities, or at facilities under CPC control.</p> <p>Phases 2-8 of this Standard do not apply to:</p> <ul style="list-style-type: none"><li>• scopes of work that are not under CPC Operational Control, or</li><li>• services such as delivery providers, office-based consultants, and other service providers who do not perform work in the field.</li></ul>

## 1. Phase One: Planning

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Work Scope HSE Assessment & Governance	<p>When a Contractor is required for work, the Contract Owner must first engage with Supply Chain and HSE to ensure the potential Contractor has been properly vetted and the associated risk has been appropriately assessed by both HSE and the Contract Owner.</p> <ul style="list-style-type: none"><li>• A clear scope of work must be defined for each contract.</li><li>• CPC Operational Control over each work scope must be determined.</li><li>• CPC must determine whether the Contractor will be assigned as the Prime Contractor (or provincial equivalent).</li></ul> <p>An HSE risk level must be assigned to each work scope under CPC Operational Control and must be referenced in the HSE Risk Ranked Activity list or Supply Chain quilt. When a work scope includes multiple tasks, the task with the highest risk level shall determine the overall risk classification.</p> <p>The HSE Risk Ranking is determined by assessing the work scope in accordance with the ConocoPhillips Risk Matrix Card (ALL-A0A-00-000-HFR-0022) and by estimating the exposure hours (based on previous annual spend).</p> <p>If, during execution of work, there is a change in scope, the risk of the added tasks and any impact on the assigned HSE risk level must be evaluated.</p>
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## Contractor HSE Management

### Operational Control

During the Planning stage, Operational Control of the contract scope of work, or portions of it, shall be determined and documented. See Appendix A for Operational Control criteria.

For any additional scopes of work that arise during the contract term, Operational Control must also be determined and documented prior to work execution.

For more information on the reporting and recording of injuries and illnesses, see Appendix F of the Occupational Injury & Illness Reporting and Recording Practice.



**NOTE:** Contractor scopes within Operational Control are identified in the HSE Risk Ranked Activity Lists or the Supply Chain Management Contractor quilt.

### HSE Risk Levels

Risk Level	Characteristics
High	Scope of work includes activities risk-ranked High (20-25).
Significant	Scope of work includes activities risk-ranked Significant (12-16).
Medium	Scope of work usually includes activities risk-ranked Medium (5-10).
Low	Scope of work usually includes activities risk-ranked Low (1-4).



**NOTE:** HSE requirements remain in place throughout on-site mobilization and demobilization of the Contractor.

### Work Scopes not on HSE Risk Level Matrix

- For new work scopes under CPC Operational Control not listed on the HSE Risk Ranked Activity List, an HSE risk assessment must be completed, and a risk level assigned, with support from the appropriate business functions. The assessment must be conducted using the CPC Risk Assessment card.

Risk levels for new work scopes must be added to the HSE Risk Ranked Activity List.



**NOTE:** Time on site (worker exposure hours or amount on labour spend) should be included as part of the overall risk assessment evaluation.

## 2. Phase Two: Sourcing and Capability Assessment

### Contractor HSE Pre- Qualification Process

Contractor HSE Pre-Qualification must be completed for Contractors bidding on work scopes under CPC Operational Control.

- At a minimum, the contractor scorecard must be reviewed in ISNetworld.
- The CPC HSE Pre-Qualification Questionnaire must be completed by the Contractor:
  - Questionnaire A – applies to Low/Medium risk levels
  - Questionnaire B – applies to Significant/High risk levels



**NOTE:** The above-mentioned questionnaires may be tailored to the job scope being evaluated, if deemed necessary.

- Completed CPC HSE Pre-Qualification Questionnaires will be stored in the Enterprise Resource Planning (ERP) software under the contractor profile and will remain valid for the duration of the Contractor's MSA.

### Contractor Capability Assessments

A Contractor Capability Assessment must be conducted using the information provided in the CPC HSE Pre-Qualification Questionnaire.

Capability assessments include a review of:

- The Contractor's ISN scorecard, including:
  - HSE performance over the previous three years,
  - HSE management system and relevant programs and procedures, and
  - historical HSE incidents, including injury/illness statistics.
- The Contractor's HSE training and competency requirements, as applicable to their contract.
- Work scope-specific SOPs.



**NOTE:** If a short-term Contractor is not a member of ISN, they are required to submit all documentation noted in Questionnaire A or B, which will be stored in the ERP software under the Contractor profile.

Contractors will be given one of the following designations based on the input provided through the Pre-Qualification process:

- Acceptable - Meets requirements as per the management system and demonstrates acceptable statistical performance
- Challenged - Many areas for improvement identified in the management system or poor statistical performance.

### 3. Phase Three: Tender and Award

#### Contract Award

Awarded contracts must include:

- The CPC Contractor HSE Requirements MSA Exhibit; and
- Scope-specific HSE requirements additional to the CPC HSE Exhibit, as agreed upon by Supply Chain, HSE, Legal, and the Contract Sponsor.

A record of the approved contract, scope of work, determination of Operational Control, assignment as Prime Contractor (or provincial equivalent), and risk level must be maintained.

- If, during the lifecycle of the contract, additional work is awarded that impacts the HSE Risk level category, this record must be updated.

A review of the Contractor's HSE performance for Significant & High-risk contracts shall be conducted prior to extending or renewing contracts.

Prior to implementing options to extend contracts or renew contracts, the Contractor Pre-Qualification process shall be followed.

#### HSE Variance Management

- The business may award the contract to any Contractor deemed Acceptable.
- A Contractor HSE variance request must be submitted to the Contractor HSE Coordinator when the business chooses to use a Contractor designated as Challenged.
- Subcontractors engaged in Significant and High-risk work must either be prequalified based on associated risk or utilize a variance as if they were Challenged.



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- HSE variance requests must include controls for how the Contractor will be managed.
  - The Contract Owner will be responsible for signing off the HSE variance request.

Completed request forms must be stored in the HSE Contractor Management SharePoint Site or the ISN vendor profile.

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## 4. Phase Four: Pre-Mobilization

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### HSE Bridging Documents

HSE Bridging documents are required in the following scenarios:

- all Significant/High-risk level contracts,
- when the Contractor requests authorization to use their own HSE procedures/policies instead of CPC's.

Bridging documents require approval from both CPC and the Contractor.

Completed Bridging documents must be readily available, should be reviewed during kick-off meetings, and must be accessible to CPC personnel through the CPC Contractor Management HSE SharePoint Site.



**NOTE:** Contractor bridging will only apply to procedures for activities that contractors may be expected to perform. Procedures conducted solely by CPC personnel or full-time equivalent will not be included in the bridging agreement.

### HSE Execution Plans

HSE Execution Plans may be developed by Contractors for work scopes that fall into the High-risk level and:

- are not routinely performed by CPC; or
- are being conducted by a new Contractor.

HSE Execution Plans may also be considered for significant activities that are not routinely performed, such as:

- shutdowns/turnarounds,
- non-routine drilling and well work (i.e., new rig mobilization),
- capital projects, and
- seismic programs.

HSE Execution Plans should address:

- a description of the scope of work (including mobilization and demobilization),
-

## Contractor HSE Management

- Significant and High-risk activities and specific safeguards associated with these activities,
- management of Subcontractors,
- HSE training tracking and verification expectations,
- environmental and sustainable development considerations,
- emergency response information,
- incident reporting and investigation,
- audit and inspection plans/frequency,
- meeting and performance review expectations; and
- KPI's and how HSE metrics will be reported.

### Contractor Oversight

ConocoPhillips manages control of work using a permit to work as outlined in the Safe Work Permit Standard (ALL-A0A-000-HST-0008).

### Pre-Mobilization Assessments

HSE Pre-Mobilization Assessments:

- must be conducted for new Contractors conducting work scopes categorized as High-risk;
- may be conducted at the discretion of the Contract Owner; and
- should be completed by the Contract Owner and HSE.

The scope of these assessments may include:

- an assessment of the Contractor's implementation of their HSE Management System requirements,
- execution readiness and any controls listed in an HSE Plan, if requested,
- inspection of equipment being mobilized to site; and
- how the Contractor is managing any deficiencies identified during the Pre-Qualification process.

Results of HSE Pre-Mobilization Assessments must be documented and communicated to the Contractor.

- Where the HSE Pre-Mobilization Assessment identifies areas of non-compliance, outstanding issues, or corrective actions, the Contractor must develop a detailed Corrective Action Plan (CAP) to address the issues identified in a prompt manner.



**NOTE:** The HSE Pre-Mobilization Assessment is designed to be a one-day "audit" but may be scaled appropriately.

## 5. Phase Five: Mobilization

HSE Leadership Training	The Contract Owner will ensure that Contractor supervision for Significant and High-risk Contractors completes Safety Leadership Canada training.
CPC Orientation	CPC Supervision shall ensure Contractors performing work on CPC work sites undergo HSE Orientation in accordance with site access requirements.
Kickoff Meetings	<p>The Contract Owner and the Contractor may facilitate a kickoff meeting after the contract award and prior to the execution of work, involving key Contractor personnel. The kickoff meeting will include representatives from the Contractor, field supervision, and a health and safety representative. It shall be conducted for all Contractors with work scopes that fall into Significant or High-risk levels.</p> <p>Example topics to be addressed in the kickoff meeting include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• CPC Values</li> <li>• Incident and near miss reporting/management</li> <li>• Life Saving Rules/high-risk work</li> <li>• Stop-work authority</li> <li>• Hazard Reporting</li> </ul>

## 6. Phase Six: Assurance

Field Level Assurance	Activities conducted by Contractors must be included as part of CPC's Field Level Assurance activities as outlined in the HSE Assurance Procedure (ALL-A0A-00-000-HST-0027).
Audit Requirements	<p>At a minimum, Contractors conducting work scopes that fall into Significant and High-risk levels must be included in CPC's auditing scope as outlined in the HSE Assurance Procedure (ALL-A0A-00-000-HST-0027). This may include:</p> <ul style="list-style-type: none"> <li>• inclusion of Contractor activities in HSE Tier II or Tier III audit scopes,</li> <li>• conducting Contractor HSE Audits; and</li> <li>• conducting HSE Pre-Mobilization Assessments.</li> </ul>

## Contractor HSE Management

The interval between audits of Significant and High-risk Level Contractors must not exceed five years. Contractor audits may be completed sooner based on identified risk(s), contractor performance, or any major changes to the Contractor's Management System or contract.

Action plans that include corrective actions with all findings for Contractor HSE audits must be entered and tracked to closure in Intalex.

### Contractor HSE Forums

Contractor HSE Forums must be held at least annually.

- Forums must include senior leadership from both CPC and selected Contractors.
- CPC senior leaders will determine the content to be included during the forums.
- Contractors are expected to be active participants and may be called upon to present.



**NOTE:** Contractor HSE Forums are intended to include multiple Contractors and strive to improve overall Contractor HSE performance.

### HSE Performance Reviews

Contractor HSE Review meetings must be held with Contractors conducting work scopes that fall into Significant or High-risk levels.

- Contractor review meetings may include representation from CPC and the Contractor's Supply Chain Management and HSE teams.
- The scope of review meetings may include:
  - a review of Contractor HSE KPIs (for the entire company and for CPC-directed work),
  - incident learnings presented by either CPC or the Contractor,
  - HSE improvements being implemented by the Contractor; and
  - a review of any audit findings and corrective action plans (if applicable).

### Contractor Management Program Evaluation

The Contractor HSE Management Program will be assessed through audits, program updates, and management system reviews.

## 7. Phase Seven: Demobilization

### Demobilization

HSE requirements shall remain in place throughout the demobilization phase.



**NOTE:** All contracts will have a demobilization phase.

## 8. Phase Eight: Evaluation and Close Out

### Contract Close Out

In the event of a Contract close out, the Contract Owner may elect to evaluate the following:

- the Contractor's HSE performance,
- lessons learned; and
- feedback for future knowledge and improvement.

## 9. Records

### Records Requirements

Record	Code	Retention
Bridging Documents	LG01	Expirations of Contractual Obligations + 10 Years and ATA
Audit Report and Corrective Action Plan	CG01	Completion/Closure/Expiration/Obsolescence + 7 Years
Contractor Audit Schedules	AD02	No longer than 7 years – current version must be kept
Contractor HSE Evaluations	LG01	Expiration of Contractual Obligations + 10 Years ATA

## Appendix A – Operational Control

ConocoPhillips has Operational Control for:

- Contracted activities on ConocoPhillips-owned or leased premises that are required to follow ConocoPhillips' HSE procedures and programs, or that have bridging agreements in place for the work; or
- Contracted activities where ConocoPhillips provides supervision over the work.



**NOTE:** Additional criteria for determining the recordability of workplace injuries and illnesses can be found in Appendix G of the Occupational Injury & Illness Reporting and Recording Practice.

Examples of when CPC has Operational Control (list is not inclusive)	Examples of when CPC does not have operational control
<ul style="list-style-type: none"> <li>• Parties who provide services at CPC locations under contract, subcontract, or purchase order to ConocoPhillips, and who work within the facility under the CPC HSE Management System.</li> <li>• Major construction sites operating under CPC HSE Management System requirements or under the Contractor's HSE Management System that has been bridged to CPC's, where ConocoPhillips has supervision of HSE aspects.</li> <li>• Well operations after initial move-in/rig-up and acceptance by ConocoPhillips. This includes rig-up/rig-down of ancillary services that are on location in support of the primary well operations after acceptance by ConocoPhillips. *</li> <li>• On pad rig walks/skid moves from well center to well center.</li> <li>• Completions - Rig down after securement of the well and rig moves to another CPC well on the same location.</li> <li>• Remediation and reclamation work when Prime Contractor status has not been issued.</li> </ul>	<ul style="list-style-type: none"> <li>• Services provided by delivery providers, office-based consultants, and service providers that do not perform work in the field.</li> <li>• "Outsourced Contract Services," which refers to services where the contractor delivers a finished product to pre-defined specifications. This often includes the bundling of materials and labour by sub-contractors under one service provider. A typical example is when the service provider has full operational control, operates under their own HSE management system, and supplies all equipment and materials as a single work scope.</li> <li>• Work where CPC is not the Prime Contractor.</li> <li>• Turn-key construction projects where CPC is not the Prime Contractor.</li> <li>• Drilling – from rig move to spud, prior to formal documented acceptance (documented in Wellview or a Pre-Job Hazard Assessment). **</li> <li>• Drilling – after formal documented rig release, prior to moving from pad to pad</li> </ul>

## Contractor HSE Management

Examples of when CPC has Operational Control (list is not inclusive)	Examples of when CPC does not have operational control
<ul style="list-style-type: none"> <li>• Routine maintenance on contractor-owned equipment during drilling rig downtimes, as specified in contracts, is within Operational Control (Drilling).</li> <li>• Maintenance on Contractor-owned equipment that is tied to CPC processes is within Operational Control, unless formally documented otherwise.</li> <li>• Seismic activities dedicated to ConocoPhillips.</li> <li>• Activities where ConocoPhillips has supervision of the work.</li> </ul> <p>*Initial rig-up is defined as activities prior to accessing the first wellbore, and rig down is after securement of the last wellbore on the pad.</p>	<p>(documented in Wellview or a Pre-Job Hazard Assessment). **</p> <ul style="list-style-type: none"> <li>• Completions – Rig down after securement of the well for rig moves off location which has been formally released by ConocoPhillips (documented in Wellview or a Pre-Job Hazard Assessment).</li> <li>• Completions – rig down after securement of the well and formally released by ConocoPhillips when rig moves to a different location (documented in Wellview or a Pre-Job Hazard Assessment).</li> <li>• Contractors engaged in inspection or maintenance on their own or rental equipment during any contracted dedicated maintenance periods, during rig or production facility shutdowns, or when maintenance is conducted at an adjacent location that does not impact CPC process systems or under CPC Supervision (documented in Wellview).</li> <li>• Designated laydown/storage areas where activities are under the control of the Contractor, used in support of activities that do not fall under CPC's HSE programs and procedures, and where CPC does not provide supervision (e.g., contractor field offices, storage areas, parking lots, or maintenance activities for contractor equipment).</li> <li>• Fabrication activities performed at a third-party owned and operated site (including work related to ConocoPhillips projects). This includes the fabrication tents at CPF 1 – Surmont.</li> <li>• Camp services when designated as the Prime Contractor.</li> <li>• Seismic work conducted for multiple clients.</li> </ul>

## Contractor HSE Management

Examples of when CPC has Operational Control (list is not inclusive)	Examples of when CPC does not have operational control
	<ul style="list-style-type: none"> <li>• Environmental monitoring, site assessment, remediation, or restoration activities on leases where CPC no longer has operating assets and does not provide supervision.</li> <li>• Contractors training their own personnel to maintain competencies required by that Contractor, when not being paid by CPC.</li> <li>• Parties that are off-hire or on standby but remain on CPC locations conducting work on their own behalf.</li> <li>• Third-party excavation on CPC's lease or impacting CPC assets that are not contracted by ConocoPhillips.</li> <li>• Building maintenance commissioned by property management where CPC is a tenant (e.g., Fort St. John office, Gulf Canada Square).</li> <li>• Consulting engineers working offsite or in their own offices.</li> <li>• Contractors in transport, travelling on public roadways from lease to lease.</li> <li>• Trucking once it leaves a CPC lease.</li> </ul>



## Appendix B -Definitions

Term	Definition
Bridging Document	Agreement between Company and Contractor, in a separate document or within the contractual agreement, which spells out HSE written requirements that will be enforced for the work.
Call-off	A change to the scope of work during the execution phase of a contract. As a part of the generation of the call-off order, an additional risk assessment is required to determine whether additional risk has been introduced to the original contract.
Contractor	Any non-ConocoPhillips, individual or organization performing work for, or on behalf of ConocoPhillips, followed an executed agreement.
Subcontractor	Any company engaged by Contractor or another Subcontractor of any tier to perform any part of the work.
Contract Owner	Budget holder directly responsible for the performance of an Agreement/Contract, or his/her delegate. There can be multiple Contract Owners for a single Contractor if the Contractor is working in multiple disciplines.
Contract Representative	The Supply Chain individual with direct responsibility for Supply Chain management/administration of an Agreement/Contract.
Operational Control	Is the determination that identifies who is responsible for the supervision of contractors and their employees for a scope of work.
Contract Sponsor	The individual with overall accountability for managing the contract performance.
Prime Contractor	Designated employer that is responsible for coordinating the occupational health and safety activities of all employers, workers, and anyone else at the workplace in accordance with the provincial OH&S Act. Additionally, Prime Contractor is responsible for establishing and maintaining procedures to ensure occupational health and safety requirements at the workplace are followed by all parties.
Scope of Work	Elements of the activities to be performed by or on behalf of Contractor under an individual Call-Off Order, together with everything else that may be reasonably inferred from such Call-Off Order as needing to be done by or on behalf of Contractor in order for Contractor to fulfill all its duties, obligations, and responsibilities under such Call-Off Order.
Subcontractor	Any company engaged by Contractor or another Subcontractor of any tier to perform any part of the work.

Supervision

Directing day-to-day work activities to influence safe performance of the work even if remote to the operation.

## References

Document Name	Document ID
Occupational Injury & Illness Reporting and Recording Practice	
Safe Work Permit Standard	ALL-A0A-00-000-HST-008
Risk Matrix	ALL-A0A-00-000-HFR-0022