

## A CONTROLLING EMPLOYER

### Purpose

The Pulsar Helium, Inc. (the Company) Safety Management System provides a sound and flexible framework for addressing safety and health hazards for all employers performing services on company-controlled property. This management system represents a [Controlling Employer](#) approach to managing workplace safety and health efforts.

The Controlling Employer approach recognizes three key philosophies that are vital to fostering a safe and healthful work environment on Company worksites:

- Pulsar will utilize in-house contractor qualification systems to ensure all contractors that perform services to the Company are qualified and have a history of safe practices.
- Pulsar Helium will perform safety assessments of employers and their worksites to prevent and detect hazards on Company-owned or controlled sites.
- When safety hazards or regulatory violations are observed, they will be documented and communicated back to the responsible employer. A follow-up assessment will be completed to ensure the owner's employer has resolved the violations or hazards.

### Scope

This Safety Management System is intended as a safety and health management guide to serve as a blueprint on how to collectively manage the Company safety program as well as how to interact with contractors from a Controlling Employer approach properly.



**A CONTROLLING EMPLOYER****Pulsar Four Disciplines of Safety Execution (4DSX)****Goal**

To protect the people, the environment, our assets, and our reputation (PEAR) by targeting zero incidents.

**Act on the Leading Measures (PHS)**

- Have a good **Plan**, that
- Identifies and mitigates the **Hazards**, and
- **Stop** the job if something is not right

**Maintain a Compelling Scorecard**

- Everyone must always have access to the safety score so they can tell if they are winning (<https://safehe.com/>)

**Accountability**

- Accountability is accomplished through the application of expectations, training, coaching, and positive reinforcement. Most importantly, team members must hold each other accountable for working safely and not taking unnecessary risks.



Source: <https://safehe.com>



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### Roles

Every person providing onsite support to Pulsar Helium is responsible for supporting this Safety Management System (SMS). A collective effort will be required of:

**Senior Management:**

Personnel at the highest level of the organization are responsible for the day-to-day management of the corporation.

**Operations Management:**

Personnel responsible for day-to-day resource allocation, operations, production, capital, and SHE objectives.

**Project Supervision:**

Personnel responsible for day-to-day deployment, direction, and supervision of resources.


**SHE:**

Personnel providing SHE management, training, assessments, communication, and advisory consultation.

**Field Workers:**

Personnel under contract to perform a service on behalf of Pulsar Helium.

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 1. Management Safety Leadership	
1.01	<div>Scope</div> <div>Management provides adequate leadership, vision, and resources for contractors to implement and maintain an effective safety and health program. It is required that employers that provide workers to any Pulsar Helium site:<ul style="list-style-type: none"><li>Make worker safety and health a core organizational value.</li><li>Are fully committed to eliminating hazards, protecting workers, and continuously improving workplace safety and health conditions.</li><li>Provide sufficient resources to implement and maintain the safety and health program.</li><li>Visibly demonstrate and communicate their safety and health commitment to workers and others.</li><li>Set an example through their own actions.</li></ul></div>
	<div>Roles</div> <div><div><b>RASCI</b> <b>Responsible:</b> Those who do the work to complete the task. <b>Accountable:</b> The person who delegates the work and is the last person to review the task or deliverable before it’s deemed complete. <b>Supportive:</b> Those who provide financial resources as necessary to accomplish the task. <b>Consulted:</b> Those who Provide input on how it will impact their work, or their domain of expertise on the deliverable itself. <b>Informed:</b> Those who are kept in the loop on project progress, rather than roped into the details of every deliverable.</div><div>Senior Management</div><div>Operations Management</div><div>Project Supervision</div><div>SHE</div><div>Field Workers</div><div>Location</div></div>
1.02	<div><div>Commitment to the SHE Program</div><div>This written Safety Management System is intended to keep all people safe and communicate that safety and health is a primary organizational values, just as important as productivity and profitability. <i>How to accomplish it</i> Establish a written safety policy statement signed by top management describing the organization's commitment to safety and health and pledging to establish and maintain a safety and health program for all workers.<ul style="list-style-type: none"><li>Communicate the policy to all workers and, at the appropriate times and places, to relevant parties, including:<ul style="list-style-type: none"><li>Contractors, subcontractors, staffing agencies, and temporary workers at your worksite(s)</li><li>Suppliers and vendors</li><li>Other businesses in the same multi-employer setting</li><li>Visitors</li><li>Delivery drivers</li><li>The community</li></ul></li></ul></div><div><ul style="list-style-type: none"><li>Reinforce management commitment by considering safety and health in all business decisions, including contractor and vendor selection, purchasing, and facility design and modification.</li><li>Be visible in operations and set an example by following the safety policies and procedures as appropriate regarding the Controlling Employer requirements.</li></ul></div></div> <div><div>S</div><div>A</div><div>C</div><div>R</div><div>I</div><div><a href="https://safehe.com/procedures">https://safehe.com/procedures</a></div></div>

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		<ul style="list-style-type: none"> <li>Begin work meetings with a discussion or review of safety and health indicators and any outstanding safety items on a "to do" list.</li> </ul>	S	A	R	R	I	
1.03	Wildly Important Safety Goal (WIG)	Goal <ul style="list-style-type: none"> <li>To protect people, the environment, our assets, and reputation by targeting zero incidents</li> </ul>	RASCI	RASCI	RASCI	RASCI	RASCI	<a href="https://safehe.com/procedures">https://safehe.com/procedures</a>
		Act on the Leading Measures (PHS) <ul style="list-style-type: none"> <li>Have a good Plan, that</li> <li>Identifies and mitigates the Hazards, and</li> <li>Stop the job if something is not right</li> </ul>	S	RAC	RAC	RAC	RAC	
		Maintain a Compelling Scorecard <ul style="list-style-type: none"> <li>Everyone must always have access to the safety score so they can tell if they are winning (Solution Center "SHE" page).</li> </ul>	S	A	I	R	I	
		Accountability <ul style="list-style-type: none"> <li>Accountability is accomplished through the application of expectations, training, coaching, and positive reinforcement. Most importantly, team members must hold each other accountable for working safely and not taking unnecessary risk.</li> </ul>	S	A	R	R	R	
1.04	Allocate Resources	Management provides the resources needed to implement the safety and health program, pursue program goals, and address program shortcomings when they are identified. <i>How to accomplish it</i> <ul style="list-style-type: none"> <li>Estimate the resources needed to establish and implement the program.</li> <li>Allow time in workers' schedules for them to participate in the program as appropriate fully.</li> <li>Integrate safety and health into the planning and budgeting processes and align budgets with program needs.</li> <li>Provide and direct resources to operate and maintain the program and meet safety and health commitments.</li> </ul> <p><b>Note:</b> Resource needs will vary depending on the company size, complexity, hazard types, and program maturity and development. Resource needs may include: capital equipment and supplies; staff time; training; access to information and tools (e.g., vendor information, Safety Data Sheets, injury/illness data, checklists, online databases); and access to outside safety and health experts.</p>	S	A	CI	R	CI	<a href="https://safehe.com/procedures">https://safehe.com/procedures</a>
			S	A	R	I	CI	
			S	A	R	R	-	
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1.05	Performance Expectations	Management leads the program effort by establishing roles and responsibilities and providing an open, positive environment that encourages communication about safety and health. <i>How to accomplish it</i> <ul style="list-style-type: none"> <li>Perform Reasonable Care assessments on a frequency that considers the following:               <ul style="list-style-type: none"> <li>The scale of the project.</li> </ul> </li> </ul>	S	A	R	R	CI	

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	<ul style="list-style-type: none"> <li>○ The nature and pace of the work, including the frequency with which the number or types of hazards change as the work progresses.</li> <li>○ How much the Company knows both about the safety history and safety practices of the employer it controls and about that employer's level of expertise.</li> <li>○ More frequent assessments are normally needed if the controlling employer knows that the contractor has a history of non-compliance. Greater inspection frequency may also be needed, especially at the beginning of the project, if the Company has never before worked with a specific contractor and does not know its compliance history.</li> <li>○ Less frequent assessments may be appropriate where the Company sees strong indications that the contractor has implemented effective safety and health efforts. The most important indicator of an effective safety and health effort by the contractor is a consistently high level of compliance. Other indicators include the use of an effective, graduated system of enforcement for non-compliance with safety and health requirements coupled with regular jobsite safety meetings and safety training.</li> </ul>	S	A	R	R	CI	<a href="https://safehe.com/assessments">https://safehe.com/assessments</a>
	<ul style="list-style-type: none"> <li>▪ Provide positive recognition for meeting or exceeding safety and health goals aimed at preventing injury.</li> </ul>	S	A	R	R	I	
	<ul style="list-style-type: none"> <li>▪ Establish ways for management and all workers to communicate freely and often about safety and health issues without fear of retaliation.</li> </ul> <p><b>Note:</b> Maintaining a positive and encouraging tone is important. Successful programs reward, rather than discipline, workers who identify problems or concerns, much like successful quality programs. Disciplinary measures should be reserved for situations in which an individual manager or worker is uncooperative or becomes an impediment to progress.</p>	S	A	CI	R	CI	

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2. Reasonable Care							
2.01	Scope	<p>Pulsar Helium will exercise reasonable care to prevent and detect violations on company owned or controlled sites. The extent of the measures that the company will implement to satisfy the duty of reasonable care is less than what is required of a contractor with respect to protecting its own employees and third parties from the risks associated with the contractor's work. This means that Pulsar Helium is not normally required to inspect for hazards as frequently or to have the same level of knowledge of the applicable standards or of trade expertise as the contractors that provide services to the company.</p>					
	Roles	<p><b>RASCI</b></p> <p><b>Responsible:</b> Those who do the work to complete the task.</p> <p><b>Accountable:</b> The person who delegates the work and is the last person to review the task or deliverable before it's deemed complete.</p> <p><b>Supportive:</b> Those who provide financial resources as necessary to accomplish the task.</p> <p><b>Consulted:</b> Those who Provide input on how it will impact their work or their domain of expertise on the deliverable itself.</p> <p><b>Informed:</b> Those who are kept in the loop on project progress, rather than roped into the details of every deliverable.</p>	Senior Management	Operations Management	Front Line Supervision/EEs	SHE	Field Workers
2.02	Safe Workplace	<p>Pulsar Helium has a specific contractual right to control safety on any company-owned or controlled site. The company itself can prevent or correct a violation of items under company control, as well as require contractors to prevent or correct violations of items under their control. The detail of this ability is made through explicit contractual authority that requires the contractor to adhere to safety and health requirements and to correct violations under their control.</p>	S	A	R	R	-
2.03	Reasonable Care	<p><b>Factors Relating to Reasonable Care</b></p> <p>Factors that affect how frequently and closely the company will inspect to meet its standard of reasonable care include:</p> <ol style="list-style-type: none"> <li>The scale of the project.</li> <li>The nature and pace of the work, including the frequency in which the hazards change as the work progresses.</li> <li>History of Incident/ near miss occurrence.</li> <li>How much the company knows both about the safety history and safety practices of the contractor it controls as well as the contractors' level of expertise.</li> <li>More frequent inspections will be conducted if the contractor has a history of non-compliance at the beginning of a project, if Pulsar Helium has never worked with the contractor, and/or if Pulsar is not aware of the compliance history of a contractor.</li> <li>Less frequent inspections may be appropriate where the company sees strong indications that the contractor has implemented effective safety and health efforts. The most important indicator of</li> </ol>	S	A	I	R	CI
							<a href="https://safehe.com/procedures">https://safehe.com/procedures</a>

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2.03	Reasonable Care	<p>an effective safety and health effort by the contractor is a consistently high level of compliance both in practice and in assessment performance. Other indicators include the use of an effective, graduated system of enforcement for non-compliance with safety and health requirements coupled with regular jobsite safety meetings and safety training.</p> <p>g. Each time a Pulsar Helium safety assessment is completed, the assessment will be:</p> <ul style="list-style-type: none"> <li>• documented and stored in the Company document management system</li> <li>• communicated to the contractor</li> <li>• followed up on to ensure correction</li> </ul> <p><b>Evaluating Reasonable Care</b></p> <p>At a minimum, Pulsar Helium will perform Reasonable Care assessments on all company operations on an annual basis. Several factors will be used to determine the safety performance of the multiple employers providing services to the Company.</p> <ol style="list-style-type: none"> <li>Conduct safety Assessments on all operations to identify regulatory compliance deficiencies.</li> <li>Communicate identified deficiencies to the employer that created the hazard.</li> <li>Ensure all employers have an effective system for promptly correcting recognized or identified hazards or deficiencies.</li> <li>Follow-up inspections to ensure deficiencies have been corrected.</li> <li>Repeat (a) thru (d) as needed to foster a cadence of continual improvement.</li> </ol>	S	A	CI	R	I	<a href="https://safehe.com/assessments">https://safehe.com/assessments</a>
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 <b>3. Team Participation</b>							
3.01	Scope	<p>To be effective, any safety and health program needs the meaningful participation of team members. The entire team has much to gain from a successful program and the most to lose if the program fails. Collectively, they often know the most about potential hazards associated with the different jobs and tasks undertaken on a daily basis.</p> <p>Team participation means that the appropriate team members are involved in establishing, operating, evaluating, and improving the safety and health program.</p> <p>According to the Pulsar Helium safety program, all workers:</p> <ul style="list-style-type: none"> <li>Are required to participate in the Company safety program as appropriate and feel comfortable providing input and reporting safety or health concerns.</li> <li>Have access to information they need to participate effectively in the program.</li> <li>Have opportunities to participate in the program as appropriate to the Controlling Employer outline.</li> <li>Do not experience retaliation when they raise safety and health concerns; report injuries, illnesses, and hazards; participate in the program; or exercise safety and health rights.</li> </ul>					
	Roles	<p><b>RASCI</b></p> <p><b>Responsible:</b> Those who do the work to complete the task.</p> <p><b>Accountable:</b> The person who delegates the work and is the last person to review the task or deliverable before it's deemed complete.</p> <p><b>Supportive:</b> Those who provide financial resources as necessary to accomplish the task.</p> <p><b>Consulted:</b> Those who Provide input on how it will impact their work or their domain of expertise on the deliverable itself.</p> <p><b>Informed:</b> Those who are kept in the loop on project progress, rather than roped into the details of every deliverable.</p>	Senior Management	Operations Management	Front Line Supervision/EEs	SHE	Field Workers
3.02	Worker Participation	<p>Including team input at critical points of the program design and implementation improves your ability to identify the presence and causes of workplace hazards, it creates a sense of program ownership among the team, it enhances their understanding of how the program works, and it helps sustain the program over time.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>Provide opportunities for team members to participate in key aspects of the program, including:               <ul style="list-style-type: none"> <li>Setting safety goals.</li> <li>Reporting hazards and developing solutions that improve safety and health.</li> <li>Participating in the Reasonable Care assessment program.</li> <li>Help define and document safe work practices.</li> <li>Development and revision of safety procedures.</li> <li>Participate as trainers or mentors where appropriate.</li> </ul> </li> </ul>	S	A	CI	R	CI
		<a href="https://Pulsar.energy">https://Pulsar.energy</a>					

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3.03	Communicate Hazards	<ul style="list-style-type: none"> <li>○ Evaluate program performance and identify opportunities for improvement.</li> </ul> <p>Workers are often best positioned to identify safety and health concerns, such as emerging workplace hazards, unsafe conditions, close calls/good catches, and actual incidents. By encouraging reporting and following up promptly on all reports, the Company can address issues before someone gets hurt or becomes ill.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>▪ Establish a process for workers to report injuries, illnesses, close calls/good catches, hazards, and other safety and health concerns, and respond to reports promptly. Include an option for anonymous reporting to reduce fear of reprisal.</li> <li>▪ Report back to workers routinely and frequently about action taken in response to their concerns and suggestions.</li> <li>▪ Emphasize that management will use reported information only to improve workplace safety and health and that no worker will experience retaliation for bringing such information to management's attention.</li> <li>▪ Empower all workers to initiate or request a temporary suspension or shut down of any work activity or operation they believe to be unsafe.</li> <li>▪ Involve workers in finding solutions to reported issues.</li> </ul>	S	A	RIC	R	CI	<a href="https://safehe.com/incident-management">https://safehe.com/incident-management</a>
3.04	Access to Information	<p>Sharing relevant safety and health information with workers fosters trust and helps organizations make more informed safety and health decisions.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>▪ Give workers the information they need to understand safety and health hazards and control measures in the workplace. Some OSHA standards require employers to make specific types of information available to workers, such as:               <ul style="list-style-type: none"> <li>○ Safety Data Sheets (SDS)</li> <li>○ Injury and illness data (may need to be redacted and aggregated to eliminate personal identifiers)</li> <li>○ Results of environmental exposure monitoring conducted in the workplace (prevent disclosure of sensitive and personal information as required)</li> </ul> </li> <li>▪ Other useful information for workers to review can include:               <ul style="list-style-type: none"> <li>○ Chemical and equipment manufacturer safety recommendations</li> <li>○ Workplace inspection reports</li> <li>○ Incident investigation reports (prevent disclosure of sensitive and personal information as required)</li> <li>○ Workplace job hazard analyses</li> </ul> </li> </ul>	S	A	I	R	I	<a href="https://safehe.com">https://safehe.com</a>

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3.05	Remove Barriers	<p>To participate meaningfully in the safety program, employees must feel that their input is welcome, their voices will be heard, and they can access reporting mechanisms. Participation will be suppressed if language, education, or skill levels in the workplace are not considered, or if workers fear retaliation or discrimination for speaking up (for example, if investigations focus on blaming individuals rather than the underlying conditions that led to the incident or if reporting an incident or concern could jeopardize the award of incentive-based prizes, rewards, or bonuses).</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>Ensure that workers from all levels of the organization can participate regardless of their skill level, education, or language.</li> <li>Provide frequent and regular feedback to show employees that their safety and health concerns are being heard and addressed.</li> <li>Authorize sufficient time and resources to facilitate worker participation; for example, hold safety and health meetings during regular working hours and make sure workers are compensated for training time.</li> </ul>	S	A	R	C	I	<a href="https://safehe.com">https://safehe.com</a>
		<ul style="list-style-type: none"> <li>Ensure that the program protects workers from being retaliated against for reporting injuries, illnesses, and hazards; participating in the program; or exercising their safety and health rights. Ensure that other policies and programs do not discourage worker participation.</li> </ul> <p><b>Note:</b> Incentive programs (such as point systems, awards, and prizes) should be designed in a manner that does not discourage injury and illness reporting; otherwise, hazards may remain undetected. Although sometimes required by law or insurance providers, mandatory drug testing following injuries can also suppress reporting. Effective safety and health programs recognize positive safety and health activities, such as reporting hazardous conditions or suggesting safer work procedures.</p> <p>Under OSHA's injury and illness recordkeeping rule (29 CFR 1904), "employers are required to establish a "reasonable" procedure for employees to report work-related injuries and illnesses promptly and accurately. A reasonable procedure is defined as one that would not deter or discourage a reasonable employee from accurately reporting a workplace injury or illness."</p>	S	A	C	R	I	

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4. Hazard Identification & Assessment																																									
4.01	Scope	One of the "root causes" of workplace injuries, illnesses, and incidents is the failure to identify or recognize hazards that are present, or that could have been anticipated. A critical element of any effective safety and health program is a proactive, ongoing process to identify and assess such hazards.  To identify and assess hazards, the Company will: <ul style="list-style-type: none"><li>Collect and review information about the hazards present or likely to be present in the workplace.</li><li>Conduct initial and periodic workplace assessments of the workplace to identify new or recurring hazards.</li><li>Investigate injuries, illnesses, incidents, and close calls/good catches to determine the underlying hazards, their causes, and safety and health program shortcomings.</li><li>Group similar incidents and identify trends in injuries, illnesses, and hazards reported.</li><li>Consider hazards associated with emergency or nonroutine situations.</li><li>Determine the severity and likelihood of incidents that could result for each hazard identified and use this information to prioritize corrective actions.</li><li>Some hazards, such as housekeeping and tripping hazards, can and should be fixed as they are found. Fixing hazards on the spot emphasizes the importance of safety and health and takes advantage of a safety leadership opportunity.</li></ul>																																							
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4.02	Access to Information																																								

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		<ul style="list-style-type: none"> <li>Input from workers, including surveys or minutes from safety and health committee meetings.</li> <li>Results of job hazard analyses, also known as job safety analyses.</li> </ul> <p>Information about hazards may be available from outside sources, such as:</p> <ul style="list-style-type: none"> <li>OSHA, National Institute for Occupational Safety and Health (NIOSH), and Centers for Disease Control and Prevention (CDC) websites, publications, and alerts.</li> <li>Trade associations.</li> <li>State and local occupational safety and health committees/coalitions ("COSH groups"), and worker advocacy groups.</li> <li>Safety and health consultants.</li> </ul>	S	A	C	R	-	
4.03	Safety Assessments	<p>Hazards can be introduced over time as workstations and processes change, equipment or tools become worn, maintenance is neglected, or housekeeping practices decline. Setting aside time to regularly inspect the workplace for hazards can help identify shortcomings so that they can be addressed before an incident occurs.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>Conduct regular assessments of all operations, equipment, work areas and facilities.</li> <li>Be sure to document assessments so you can later verify that hazardous conditions are corrected. Take photos or video of problem areas to facilitate later discussion and brainstorming about how to control them, and for use as learning aids.</li> <li>Include all areas and activities in these assessments, such as storage and warehousing, facility, and equipment maintenance, purchasing and office functions, and the activities of on-site contractors, subcontractors, and temporary employees.</li> <li>Regularly inspect operations assigned vehicles, forklifts, powered industrial trucks.</li> <li>Use checklists that highlight things to look for. Typical hazards fall into several major categories, such as those listed below; each workplace will have its own list:               <ul style="list-style-type: none"> <li>General Housekeeping</li> <li>Slip, Trip, and Fall Hazards</li> <li>Electrical hazards</li> <li>Equipment Operation</li> <li>Equipment Maintenance</li> <li>Fire Protection</li> <li>Work Organization (including staffing and scheduling)</li> </ul> </li> </ul>	S	A	C	R	CI	<a href="https://safehe.com">https://safehe.com</a>

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4.03	Safety Assessments	<ul style="list-style-type: none"> <li>○ Work Practices</li> <li>○ Workplace Violence</li> <li>○ Ergonomics</li> <li>○ Emergency Procedures</li> </ul> <ul style="list-style-type: none"> <li>▪ Before changing operations, workstations, or workflow; making major organizational changes; or introducing new equipment, materials, or processes, seek the input of workers and evaluate the planned changes for potential hazards and related risks.               <ul style="list-style-type: none"> <li>○ <b>Note:</b> Many hazards can be identified using common knowledge and available tools. For example, you can easily identify, and correct hazards associated with broken stair rails and frayed electrical cords. Workers can be a very useful internal resource, especially if they are trained on how to identify and assess risks.</li> </ul> </li> </ul>	S	A	C	R	CI	<a href="https://safehe.com/assessments">https://safehe.com/assessments</a>
4.04	Identify Health Hazards	<p>Identifying workers' exposure to health hazards is typically more complex than identifying physical safety hazards. For example, gases and vapors may be invisible, often have no odor, and may not have an immediately noticeable harmful health effect. Health hazards include chemical hazards (solvents, adhesives, paints, toxic dusts, etc.), physical hazards (noise, radiation, heat, etc.), biological hazards (infectious diseases), and ergonomic risk factors (heavy lifting, repetitive motions, vibration).</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>▪ Identify <i>chemical hazards</i> –review SDS and product labels to identify chemicals in your workplace that have low exposure limits, are highly volatile, or are used in large quantities or in unventilated spaces. Identify activities that may result in skin exposure to chemicals.</li> <li>▪ Identify <i>physical hazards</i> –identify any exposures to excessive noise (areas where you must raise your voice to be heard by others), elevated heat (indoor and outdoor), or sources of radiation (radioactive materials, X-rays, or radiofrequency radiation).</li> <li>▪ Identify <i>biological hazards</i> –determine whether workers may be exposed to sources of infectious diseases, molds, toxic or poisonous plants, or animal materials (fur or scat) capable of causing allergic reactions or occupational asthma.</li> <li>▪ Identify <i>ergonomic risk factors</i> –examine work activities that require heavy lifting, work above shoulder height, repetitive motions, or tasks with significant vibration.</li> <li>▪ Conduct <i>quantitative exposure assessments</i> –when possible, using air sampling or direct reading instruments.</li> <li>▪ <i>Review medical records</i> –to identify cases of musculoskeletal injuries, skin irritation or dermatitis, hearing loss, or lung disease that may be related to workplace exposures.</li> </ul>	S	A	C	R	C	<a href="https://safehe.com/procedures">https://safehe.com/procedures</a>

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4.05	Incident Management & Investigations	<p>Workplace incidents –including injuries, illnesses, close calls/good catches, and reports of other concerns– provide a clear indication of where hazards exist. By thoroughly investigating incidents and reports, you will identify hazards that are likely to cause future harm. The purpose of an investigation must always be to identify the root causes (and there is often more than one) of the incident or concern, in order to prevent future occurrences.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>▪ Develop a clear plan and procedure for conducting incident investigations, so that an investigation can begin immediately when an incident occurs. The plan should cover items such as:               <ul style="list-style-type: none"> <li>○ Who will be involved?</li> <li>○ Lines of communication</li> <li>○ Materials, equipment, and supplies needed</li> <li>○ Reporting forms and templates</li> </ul> </li> <li>▪ Train investigative teams on incident investigation techniques, emphasizing objectivity and open-mindedness throughout the investigation process.</li> <li>▪ Conduct investigations with a trained team that includes representatives of both management and workers.</li> <li>▪ Investigate close calls/good catches.</li> <li>▪ Identify and analyze root causes to address underlying program shortcomings that allowed the incidents to happen.</li> <li>▪ Communicate the results of the investigation to managers, supervisors, and workers to prevent recurrence.</li> </ul> <p>Effective incident investigations do not stop at identifying a single factor that triggered an incident. They ask the questions "Why?" and "What led to the failure?" For example, if a piece of equipment fails, a good investigation asks: "Why did it fail?" "Was it maintained properly?" "Was it beyond its service life?" and "How could this failure have been prevented?" Similarly, a good incident investigation does not stop when it concludes that a worker made an error. It asks such questions as: "Was the worker provided with appropriate tools and time to do the work?" "Was the worker adequately trained?" and "Was the worker properly supervised?"</p> <p><b>Note:</b> OSHA has special reporting requirements for work-related incidents that lead to serious injury or a fatality (29 CFR 1904.39). OSHA must be notified within 8 hours of a work-related fatality, and within 24 hours of an amputation, loss of an eye, or inpatient hospitalization.</p>	S	A	CI	R	CI	<a href="https://safehe.com/procedures">https://safehe.com/procedures</a>
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4.06	Emergency and Nonroutine Situations	<p>Emergencies present hazards that need to be recognized and understood. Nonroutine or infrequent tasks, including maintenance and startup/shutdown activities, also present potential hazards. Plans and procedures need to be developed for responding appropriately and safely to hazards associated with foreseeable emergency scenarios and nonroutine situations.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>Identify foreseeable emergency scenarios and nonroutine tasks, taking into account the types of material and equipment in use and the location onsite. Scenarios such as the following may be foreseeable:               <ul style="list-style-type: none"> <li>Fires and explosions</li> <li>Chemical releases</li> <li>Hazardous material spills</li> <li>Startups after planned or unplanned equipment shutdowns</li> <li>Nonroutine tasks, such as infrequently performed maintenance activities</li> <li>Structural collapse</li> <li>Disease outbreaks</li> <li>Weather emergencies and natural disasters</li> <li>Medical emergencies</li> <li>Workplace violence</li> </ul> </li> </ul>	S	A	C	R	C	<a href="https://safehe.com/emergencies">https://safehe.com/emergencies</a>
4.07	Hazard Management	<p>The next step is to assess and understand the hazards identified and the types of incidents that could result from worker exposure to those hazards. This information can be used to develop interim controls and to prioritize <a href="#">hazards for permanent control</a>.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>Evaluate each hazard by considering the severity of potential outcomes, the likelihood that an event or exposure will occur, and the number of workers who might be exposed.</li> <li>Use interim control measures to protect workers until more permanent solutions can be implemented.</li> <li>Prioritize the hazards so that those presenting the greatest risk are addressed first. Note, however, that employers have an ongoing obligation to control all serious recognized hazards and to protect workers.</li> </ul> <p><b>Note:</b> "Risk" is the product of a hazard's likelihood of occurrence and severity of consequence. Thus, risk can be reduced by reducing the likelihood of the hazard or by reducing workers' exposure to the hazard. An assessment of risk helps the Company understand hazards in the context of the workplace and prioritize hazards for permanent control.</p>	S	A	C	R	C	<a href="https://safehe.com/procedures">https://safehe.com/procedures</a>



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4.08	Risk Ranking	<p><b>Review of Safety Assessments</b></p> <p>Safety trends and hazard identifications are formally reviewed annually or repeated at reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions.</p> <p>The respective Company manager will advise the Safety Director when additional hazards are introduced into the workplace in order to revise planning and assessment needs.</p> <p><b>Risk Assessment</b></p> <hr/> <p>Hazards are classified and ranked based on severity. The program identifies hazards are classified/prioritized and addressed based on the risk associated with the task. (See the risk analysis matrix outlining severity and probability).</p> <p><b>Risk Categories</b></p> <hr/> <p>Risk will be identified by the following impact classes:</p> <p><b>P-</b> People  <b>E-</b> Environmental  <b>A-</b> Asset  <b>R-</b> Reputation</p> <p><b>Impact Factor</b></p> <hr/> <p><b>The following six levels of severity will be considered when determining the actual or potential consequence:</b></p> <p><b>Level 0:</b> (P)No injury or health effect (A)No damage (E)No effect (R)Slight Impact</p> <p><b>Level 1:</b> (P)First aid injury, Slight health effect (A)Slight damage &lt;\$5,000 (E)Slight effect- Not reportable (R)Minor impact- no media</p> <p><b>Level 2:</b> (P)Recordable injury or infectious health effect (A)Minor damage between \$5,000- \$9,999 (E)Minor effect- reportable on location (R)Minor impact- rumor</p> <p><b>Level 3:</b> (P)Lost time injury (A)Moderate damage between \$10,000 - \$25,999 (E)Moderate effect- reportable (R)Moderate impact- Local media</p> <p><b>Level 4:</b> (P)Multiple recordable or lost time injuries, debilitating health effect (A)Major damage between \$26,000 - \$100,000 (E)Major effect- reportable off location (R)Major impact- Potential national media</p> <p><b>Level 5:</b> (P)Fatality or multiple fatalities (A)Massive damage &gt;\$100,000 (E)Massive environmental impact - emergency services required (R)Massive impact- National media response</p> <p><b>Consequence Factor:</b></p> <p><b>Low:</b> Never heard of in the industry</p> <p><b>Medium:</b> Has happened in the industry but not in Company operations for the last 3 years (consider Felix &amp; Ovintiv history)</p> <p><b>High:</b> Has happened in Company operations within the last 3 years</p> <p><b>Review Process</b></p> <hr/> <p>The Hazard Identification and Safety Assessment program will be continually reviewed and revised as necessary to facilitate peak performance and continual improvement.</p>
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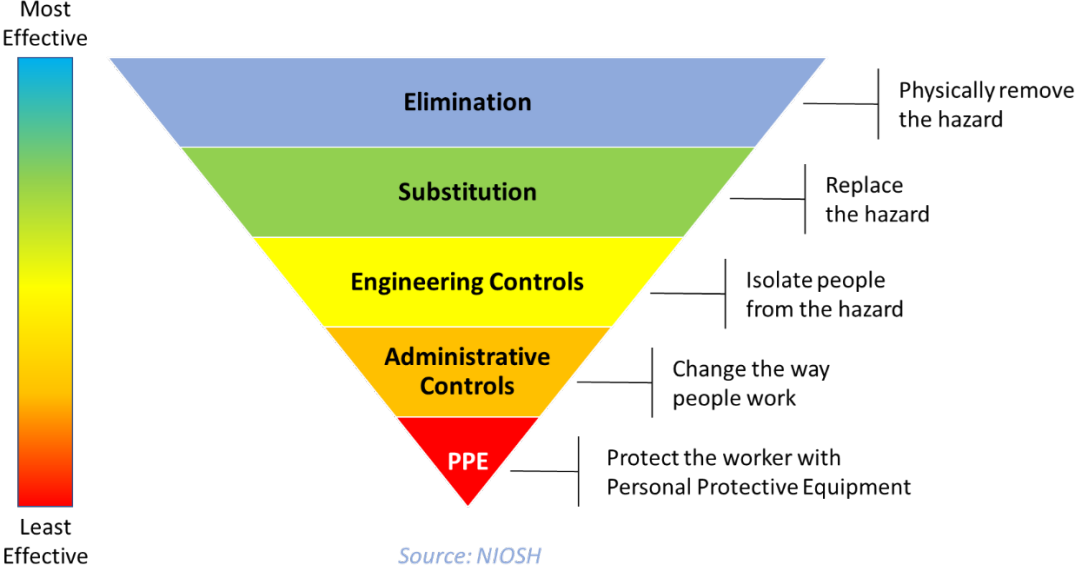
## A CONTROLLING EMPLOYER

 5. Hazard Prevention & Control									
5.01	Scope	<p>Effective controls protect workers from workplace hazards; help avoid injuries, illnesses, and incidents; minimize or eliminate safety and health risks; and help employers provide workers with safe and healthful working conditions. The processes described in this section will help the Company prevent and control hazards identified in the previous section.</p> <p>To effectively control and prevent hazards, the Company will:</p> <ul style="list-style-type: none"><li>Involve workers, who often have the best understanding of the conditions that create hazards and insights into how they can be controlled.</li><li>Identify and evaluate options for controlling hazards, using a "hierarchy of controls."</li><li>Use a hazard control plan to guide the selection and implementation of controls and implement controls according to the plan.</li><li>Develop plans with measures to protect workers during emergencies and nonroutine activities.</li><li>Evaluate the effectiveness of existing controls to determine whether they continue to provide protection, or whether different controls may be more effective. Review new technologies for their potential to be more protective, more reliable, or less costly.</li></ul>							
	Roles	<table><tr><th colspan="2">RASCI</th></tr><tr><td><b>Responsible:</b> Those who do the work to complete the task.</td><td rowspan="5">Senior Management Operations Management Front Line Supervision/EEs SHE Field Workers Location</td></tr><tr><td><b>Accountable:</b> The person who delegates the work and is the last person to review the task or deliverable before it's deemed complete.</td></tr><tr><td><b>Supportive:</b> Those who provide financial resources as necessary to accomplish the task.</td></tr><tr><td><b>Consulted:</b> Those who Provide input on how it will impact their work, or their domain of expertise on the deliverable itself.</td></tr><tr><td><b>Informed:</b> Those who are kept in the loop on project progress, rather than roped into the details of every deliverable.</td></tr></table>	RASCI		<b>Responsible:</b> Those who do the work to complete the task.	Senior Management Operations Management Front Line Supervision/EEs SHE Field Workers Location	<b>Accountable:</b> The person who delegates the work and is the last person to review the task or deliverable before it's deemed complete.	<b>Supportive:</b> Those who provide financial resources as necessary to accomplish the task.	<b>Consulted:</b> Those who Provide input on how it will impact their work, or their domain of expertise on the deliverable itself.
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<b>Informed:</b> Those who are kept in the loop on project progress, rather than roped into the details of every deliverable.									
5.02	Identify Control Options	<p>A wealth of information exists to help the Company investigate options for controlling identified hazards. Before selecting any control options, it is essential to solicit workers' input on their feasibility and effectiveness.</p> <p><i>How to accomplish it</i></p> <p>Collect, organize, and review information with workers to determine what types of hazards may be present and which workers may be exposed or potentially exposed. Information available in the workplace may include:</p> <ul style="list-style-type: none"><li>Review sources such as OSHA standards and guidance, industry consensus standards, National Institute for Occupational Safety and Health (NIOSH) publications, manufacturers' literature, and engineering reports to identify potential control measures. Keep current on relevant information from trade or professional associations.</li><li>Investigate control measures used in other workplaces and determine whether they would be effective at your workplace.</li></ul>	S	A	C	R	C	<a href="https://safehe.com/assessments">https://safehe.com/assessments</a>	

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5.02	Identify Control	<ul style="list-style-type: none"> <li>Get input from workers who may be able to suggest and evaluate solutions based on their knowledge of the facility, equipment, and work processes.</li> </ul> <p>For complex hazards, consult with safety and health experts as necessary.</p>	S	A	C	R	C	
5.03	Select Controls	<p>Select the controls that are the most feasible, effective, and permanent.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>Eliminate or control all serious hazards (hazards that are causing or are likely to cause death or serious physical harm) immediately.</li> <li>Use interim controls while you develop and implement longer-term solutions.</li> <li>Select controls according to a hierarchy that emphasizes engineering solutions (including elimination or substitution) first, followed by safe work practices, administrative controls, and finally personal protective equipment.</li> <li>Avoid selecting controls that may directly or indirectly introduce new hazards. Examples include requiring long sleeve FR shirts in high heat environments without considering the hazards associated with the body's inability to cool itself or using hearing protection that makes it difficult to hear backup alarms.</li> <li>Review and discuss control options with workers to ensure that controls are feasible and effective.</li> <li>Use a combination of control options when no single method fully protects workers.</li> </ul> <p><b>Note:</b> Whenever possible, select equipment, machinery, and materials that are inherently safer based on the application of "Prevention through Design" (PtD) principles. Apply PtD when making your own facility, equipment, or product design decisions.</p> <p>Develop and update a hazard control plan</p> <p>A hazard control plan describes how the selected controls will be implemented. An effective plan will address serious hazards first. Interim controls may be necessary, but the overall goal is to ensure effective long-term control of hazards. It is important to track progress toward completing the control plan and periodically (at least annually and when conditions, processes or equipment change) verify that controls remain effective.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>List the hazards needing controls in order of priority.</li> </ul>	S	A	R	R	CI	<a href="https://safehe.com/assessments">https://safehe.com/assessments</a> <a href="https://safehe.com/procedures">https://safehe.com/procedures</a>

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5.03	Select Controls	<ul style="list-style-type: none"> <li>Assign responsibility for installing or implementing the controls to a specific person or persons with the power or ability to implement the controls.</li> <li>Establish a target completion date.</li> <li>Plan how you will track progress toward completion.</li> <li>Plan how you will verify the effectiveness of controls after they are installed or implemented.</li> </ul>	S	A	R	R	C	
<div data-bbox="284 514 1356 1081">  <p><b>Most Effective</b></p> <p><b>Elimination</b> — Physically remove the hazard</p> <p><b>Substitution</b> — Replace the hazard</p> <p><b>Engineering Controls</b> — Isolate people from the hazard</p> <p><b>Administrative Controls</b> — Change the way people work</p> <p><b>PPE</b> — Protect the worker with Personal Protective Equipment</p> <p><b>Least Effective</b></p> <p><i>Source: NIOSH</i></p> </div>								
5.04	Hazard Control Plan	<p>A hazard control plan describes how the selected controls will be implemented. An effective plan will address serious hazards first. Interim controls may be necessary, but the overall goal is to ensure effective long-term control of hazards. It is important to track progress toward completing the control plan and periodically (at least annually and when conditions, processes or equipment change) verify that controls remain effective.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>List the hazards needing controls in order of priority.</li> <li>Assign responsibility for installing or implementing the controls to a specific person or persons with the power or ability to implement the controls.</li> <li>Establish a target completion date.</li> <li>Plan how you will track progress toward completion.</li> <li>Plan how you will verify the effectiveness of controls after they are installed or implemented.</li> </ul>	S	A	C	R	I	<a href="https://safehe.com">https://safehe.com</a>

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5.05	Nonroutine Operations & Emergencies	<p>The hazard control plan should include provisions to protect workers during nonroutine operations and foreseeable emergencies. Depending on your workplace, these could include fires and explosions; chemical releases; oil spills; unplanned equipment shutdowns; infrequent maintenance activities; natural and weather disasters; workplace violence; terrorist or criminal attacks; disease outbreaks (e.g., pandemic influenza); or medical emergencies. Nonroutine tasks, or tasks workers don't normally do, should be approached with caution. Prior to initiating such work, review job hazard analyses and job safety analyses with any workers involved and notify others about the nature of the work, work schedule, and any necessary precautions.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>Develop procedures to control hazards that may arise during nonroutine operations (e.g., removing machine guarding during maintenance and repair).</li> <li>Develop or modify plans to control hazards that may arise in emergency situations.</li> <li>Procure any equipment needed to control emergency-related hazards.</li> <li>Assign responsibilities for implementing the emergency plan.</li> <li>Conduct emergency drills to ensure that procedures and equipment provide adequate protection during emergency situations.</li> </ul> <p><b>Note:</b> Depending on location, type of business, and materials stored or used on site, authorities including local fire and emergency response departments, state agencies, the U.S. Environmental Protection Agency, the Department of Homeland Security, and OSHA may have additional requirements for emergency plans.</p>	S	A	C	R	I	<a href="https://safehe.com/emergencies">https://safehe.com/emergencies</a>
5.06	Implement Controls	<p>Once hazard prevention and control measures have been identified, they should be implemented according to the hazard control plan.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>Implement hazard control measures according to the priorities established in the hazard control plan.</li> <li>When resources are limited, implement measures on a "worst-first" basis, according to the hazard risk ranking priorities (risk) established during hazard identification and assessment. (Note, however, that regardless of limited resources, the Company has an obligation to protect workers from recognized, serious hazards.)</li> <li>Promptly implement any measures that are easy and inexpensive—e.g., general housekeeping, removal of obvious tripping hazards such as electrical cords, basic lighting—regardless of the level of hazard they involve.</li> </ul>	S	A	RC	R	RC	<a href="https://safehe.com">https://safehe.com</a>

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5.07	Follow up	<p>To ensure that control measures are and remain effective, the Company should track progress in implementing controls, inspect and evaluate controls once they are installed, and follow routine preventive maintenance practices.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>▪ Track progress and verify implementation by asking the following questions:               <ul style="list-style-type: none"> <li>○ Have all control measures been implemented according to the hazard control plan?</li> <li>○ Have engineering controls been properly installed and tested?</li> <li>○ Have workers been appropriately trained so that they understand the controls, including how to operate engineering controls, safe work practices, and PPE use requirements?</li> <li>○ Are controls being used correctly and consistently?</li> </ul> </li> <li>▪ Conduct regular assessments (and industrial hygiene monitoring, if indicated) to confirm that engineering controls are operating as designed.</li> <li>▪ Evaluate control measures to determine if they are effective or need to be modified. Involve workers in the evaluation of the controls. If controls are not effective, identify, select, and implement further control measures that will provide adequate protection.</li> <li>▪ Confirm that work practices, administrative controls, and personal protective equipment use policies are being followed.</li> <li>▪ Conduct routine preventive maintenance of equipment, facilities, and controls to help prevent incidents due to equipment failure.</li> </ul>	S	A	C	R	I	<a href="https://safehe.com/assessments">https://safehe.com/assessments</a>
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6. Education & Training							
6.01	Scope	<p>Education and training are important tools for informing workers and managers about workplace hazards and controls so they can work more safely and be more productive. Another role of education and training, however, is to provide workers and managers with a greater understanding of the safety and health program itself, so that they can contribute to its development and implementation.</p> <p>Education and training provides managers, supervisors, and workers with:</p> <ul style="list-style-type: none"> <li>Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk.</li> <li>Awareness and understanding of workplace hazards and how to identify, report, and control them.</li> <li>Specialized training when their work involves unique hazards.</li> </ul> <p>Additional training may be needed depending on the roles assigned to individual managers, supervisors, and workers. For example, managers, and supervisors may need specific training to ensure that they can fulfill their roles in providing leadership, direction, and resources for the safety and health program. Workers assigned specific roles in the program (e.g., incident investigation team members) may need training to ensure their full participation in those functions.</p> <p>Effective training and education can be provided outside a formal classroom setting. Peer-to-peer training, on-the-job training, and worksite demonstrations can be effective in conveying safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p>					
	Roles	<p><b>RASCI</b></p> <p><b>Responsible:</b> Those who do the work to complete the task.</p> <p><b>Accountable:</b> The person who delegates the work and is the last person to review the task or deliverable before it's deemed complete.</p> <p><b>Supportive:</b> Those who provide financial resources as necessary to accomplish the task.</p> <p><b>Consulted:</b> Those who Provide input on how it will impact their work, or their domain of expertise on the deliverable itself.</p> <p><b>Informed:</b> Those who are kept in the loop on project progress, rather than roped into the details of every deliverable.</p>	Senior Management	Operations Management	Front Line Supervision/EEs	SHE	Field Workers
6.02	Awareness Training	<p>Managers, supervisors, and employees all need to understand the program's structure, plans, and procedures. Having this knowledge ensures that everyone can fully participate in developing, implementing, and improving the program.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>Provide training to all managers, supervisors, workers, contractors, subcontractors, and temporary agency workers on:               <ul style="list-style-type: none"> <li>The controlling employer program</li> </ul> </li> </ul>	S	A	I	R	I
							<a href="https://safehe.com">https://safehe.com</a>

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6.02	Awareness Training	<ul style="list-style-type: none"> <li>○ Safety and health policies, goals, and procedures</li> <li>○ Functions of the safety and health program</li> <li>○ Whom to contact with questions or concerns about the program (including contact information)</li> <li>○ How to report hazards, injuries, illnesses, and close calls/good catches</li> <li>○ What to do in an emergency</li> <li>○ The employer's responsibilities under the program</li> <li>○ Workers' rights under the Occupational Safety and Health Act</li> </ul> <ul style="list-style-type: none"> <li>▪ Provide information on the safety and health hazards of the workplace and the controls for those hazards.</li> <li>▪ Ensure that training is provided in the language(s) and at a literacy level that all workers can understand.</li> <li>▪ Emphasize that the program can only work when everyone is involved and feels comfortable discussing concerns; making suggestions; and reporting injuries, incidents, and hazards.</li> <li>▪ Confirm, as part of the training, that all workers have the right to report injuries, incidents, hazards, and concerns and to fully participate in the program without fear of retaliation.</li> </ul>	S	A	I	R	I	<a href="https://safehe.com">https://safehe.com</a>
6.03	Management Training	<p>Managers, and supervisors are in part responsible for workers' safety, yet sometimes have little training on safety-related concepts and techniques. They may benefit from specific training that allows them to fulfill their leadership roles in the program.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>▪ Reinforce managers and supervisors' knowledge of their responsibilities and accountabilities.</li> <li>▪ Train managers and supervisors on procedures for responding to workers' reports of injuries, illnesses, and incidents, including ways to avoid discouraging reporting.</li> <li>▪ Instruct managers and supervisors on fundamental concepts and techniques for recognizing hazards and methods of controlling them, including the hierarchy of controls.</li> <li>▪ Instruct managers and supervisors on the company incident investigation techniques, including root cause analysis.</li> </ul>	S	A	CR	R	I	<a href="https://safehe.com">https://safehe.com</a>



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6.04	Job Specific Training	<p>Additional training may be needed to ensure that workers can incorporate any assigned safety and health responsibilities into their daily routines and activities.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>▪ Instruct workers on how to report injuries, illnesses, incidents, and concerns. If a computerized reporting system is used, ensure that all employees have the basic computer skills and computer access sufficient to submit an effective report.</li> <li>▪ Instruct workers assigned specific roles within the safety and health program on how they should carry out those responsibilities, including:               <ul style="list-style-type: none"> <li>○ Hazard recognition and controls</li> <li>○ Participation in incident investigations</li> <li>○ Program evaluation and improvement</li> </ul> </li> <li>▪ Provide opportunities for workers to ask questions and provide feedback during and after the training.</li> <li>▪ As the program evolves, institute a more formal process for determining the training needs of workers responsible for developing, implementing, and maintaining the program.</li> </ul>	S	A	C	R	I	<a href="https://safehe.com">https://safehe.com</a>
6.05	HAZID & Controls Training	<p>Providing workers with an understanding of hazard recognition and control and actively involving them in the process can help to eliminate hazards before an incident occurs.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>▪ Train workers on techniques for identifying hazards, such as job hazard analysis.</li> <li>▪ Train workers so they understand and can recognize the hazards they may encounter in their own jobs, as well as more general work-related hazards.</li> <li>▪ Instruct workers on concepts and techniques for controlling hazards, including the hierarchy of controls and its importance.</li> <li>▪ Train workers on the proper use of work practice and administrative controls.</li> <li>▪ Train workers on when and how to wear required personal protective equipment.</li> <li>▪ Provide additional training, as necessary, when a change in facilities, equipment, processes, materials, or work organization could increase hazards, and whenever a worker is assigned a new task.</li> </ul>	S	A	C	R	I	<a href="https://safehe.com">https://safehe.com</a>

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 7. Safety Program Evaluation & Improvement																																									
7.01	Scope	Once a safety and health program is established, it should be evaluated initially to verify that it is being implemented as intended. After that, employers should periodically, and at least annually, step back and assess what is working and what is not, and whether the program is on track to achieve its goals. Whenever these assessments identify opportunities to improve the program, managers, and supervisors, in coordination with workers, should make adjustments and monitor how well the program performs as a result. Sharing the results of monitoring and evaluation within the workplace, and celebrating successes, will help drive further improvement.  Program evaluation and improvement includes: <ul style="list-style-type: none"><li>▪ Establishing, reporting, and tracking goals and targets that indicate whether the program is making progress.</li><li>▪ Evaluating the program initially and periodically thereafter to identify shortcomings and opportunities for improvement.</li><li>▪ Providing ways for workers to participate in program evaluation and improvement.</li></ul>																																							
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7.02	Performance Monitoring	The first step in monitoring is to define indicators that will help track performance and progress. Next, employers, managers, supervisors, and workers need to establish and follow procedures to collect, analyze, and review performance data.  Both lagging and leading indicators should be used. Lagging indicators generally track worker exposures and injuries that have already occurred. Leading indicators track how well various aspects of the program have been implemented and reflect steps taken to prevent injuries or illnesses before they occur.  <i>How to accomplish it</i> <ul style="list-style-type: none"><li>▪ Develop and track lagging indicators of progress toward established safety and health goals, such as:<ul style="list-style-type: none"><li>○ Man-hours worked</li><li>○ Number and severity of injuries and illnesses</li></ul></li></ul>																																							


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7.02	Performance Monitoring	<ul style="list-style-type: none"> <li>Develop and track leading indicators, such as:               <ul style="list-style-type: none"> <li>Level of worker participation in program activities</li> <li>Number of employee safety suggestions</li> <li>Number of hazards, good catches and first aid cases reported</li> <li>Amount of time taken to respond to reports</li> <li>Number and frequency of management walkthroughs</li> <li>Number and severity of hazards identified during assessments</li> <li>Number of workers who have completed required safety and health training</li> <li>Timely completion of corrective actions after a workplace hazard is identified or an incident occurs</li> <li>Timely completion of planned preventive maintenance activities</li> <li>Worker opinions about program effectiveness obtained from a safety climate or safety opinion survey</li> </ul> </li> <li>Analyze performance indicators and evaluate progress over time.</li> <li>Share results with workers and invite their input on how to further improve performance.</li> <li>When opportunities arise, share your experience, and compare your results to similar facilities within your organization, with other employers you know, or through business or trade associations.</li> </ul> <p><b>Note:</b> Indicators can be either quantitative or qualitative. Whenever possible, select indicators that are measurable (quantitative) and that will help you determine whether you have achieved your program goals. The number of reported hazards and good catches would be a quantitative indicator. A single worker expressing a favorable opinion about program participation would be a qualitative indicator.</p>	S	A	C	R	C	Derived from assessment data
7.03	Program Evaluation	<p>Initially and at least annually, the program will be evaluated to ensure that it is operating as intended, is effective in controlling identified hazards, and is making progress toward established safety and health goals and objectives. The scope and frequency of program evaluations will vary depending on changes in OSHA standards; the scope, complexity, and maturity of the program; and the types of hazards it must control.</p> <p><i>How to accomplish it</i></p> <ul style="list-style-type: none"> <li>Verify that the core elements of the program have been fully implemented.</li> <li>Involve workers in all aspects of program evaluation, including: reviewing information (such as incident reports and exposure monitoring results); establishing and tracking performance indicators; and identifying opportunities to improve the program.</li> </ul>	S	A	C	R	C	<a href="https://safehe.com">https://safehe.com</a>

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7.03	Program Evaluation	<ul style="list-style-type: none"> <li>Verify that the following key processes are in place and operating as intended:               <ul style="list-style-type: none"> <li>Reporting injuries, illnesses, incidents, hazards, and concerns</li> </ul> </li> </ul> <p>Conducting workplace assessments and incident investigations</p> <ul style="list-style-type: none"> <li>Tracking progress in controlling identified hazards and ensuring that hazard control measures remain effective</li> <li>Collecting and reporting any data needed to monitor progress and performance</li> </ul> <ul style="list-style-type: none"> <li>Review the results of any compliance audits to confirm that any program shortcomings are being identified. Verify that actions are being taken that will prevent recurrence.</li> </ul>	S	A	C	R	C	<a href="https://safehe.com">https://safehe.com</a>
7.04	Continual Improvement	<p>Whenever a problem is identified in any part of the safety and health program, the Company, in coordination with supervisors, managers, and workers, should take prompt action to correct the problem and prevent its recurrence.</p> <p><i>How to accomplish it</i></p> <p>If you discover program shortcomings, take actions needed to correct them.</p> <ul style="list-style-type: none"> <li>Proactively seek input from managers, workers, supervisors, and other stakeholders on how you can improve the program.</li> <li>Determine whether changes in equipment, facilities, materials, key personnel, or work practices trigger any need for changes in the program.</li> <li>Determine whether your performance indicators and goals are still relevant and, if not, how you could change them to more effectively drive improvements in workplace safety and health.</li> </ul> <p><b>Note:</b> The scope and frequency of program evaluations will depend on the scope, complexity, and maturity of the program and on the types of hazards it must control. Program evaluations should be conducted periodically (and at least annually) but might also be triggered by a change in process or equipment, or an incident such as a serious injury, significant property damage, or an increase in safety-related complaints.</p>	S	A	C	R	C	<a href="https://safehe.com">https://safehe.com</a>

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 <b>8. Contractor Safety Management</b>							
<b>8.01</b>	<b>Scope</b>	Because Pulsar Helium does not use company employees in the management or execution of all field operations or activities, the Company retains contractors with a high level of knowledge of the various applicable operational and safety standards and a high level of trade expertise to manage and carry out all field functions in a safe manner. Pulsar Helium relies on the expertise of its consultants and contractors to manage all company field operations functions in a safe manner.					
	<b>Roles</b>	<b>RASCI</b>  <b>Responsible:</b> Those who do the work to complete the task. <b>Accountable:</b> The person delegates the work and is the last to review the task or deliverable before it's deemed complete. <b>Supportive:</b> Those who provide financial resources as necessary to accomplish the task. <b>Consulted:</b> Those who Provide input on how it will impact their work or their domain of expertise on the deliverable. <b>Informed:</b> Those who are kept in the loop on project progress, rather than roped into the details of every deliverable.	Senior Management	Operations Management	Front Line Supervision/EEs	SHE	Field Workers
<b>8.02</b>	<b>Communication</b>	The Company has established and implemented a reasonable care program to ensure qualified contractors are retained to perform the work. It is required that each contractor have health and safety programs in place that meet lawful requirements. Because the Company is a Controlling Employer, it is also required that each contractor meet the requirements of their own in-house safety program requirements. Creating a work environment where workers can perform their duties according to their in-house orientations, training, and historical and repetitive exposures will allow workers to provide services without the confusion created by changing policies and procedures and bridging documents. The Company will not create different requirements or procedures then those that the workers are accustomed to through their own established in-house safety practices. The extent of the measures that the Company must implement to satisfy the duty of reasonable care is less than what is required of a contractor with respect to protecting its own employees.  <i>How to accomplish it</i> <ul style="list-style-type: none"> <li>Create a contractor qualification program that identifies and selects contractors based on acceptable safety history, adequate safety policies &amp; procedures, proficient level of expertise, and adequate safety programs.</li> <li>At a minimum, Pulsar Helium will perform assessments on contractor operations on a quarterly basis. Three areas of focus will be assessed to determine the safety performance of the contractors:</li> <li>Assess operations to identify regulatory compliance deficiencies.</li> </ul>	S	A	I	R	I
							<a href="https://safehe.com">https://safehe.com</a>

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8.02	Communication	<ul style="list-style-type: none"> <li>Ensure contractors have an effective system for promptly correcting recognized or identified hazards.</li> <li>Pulsar Helium will enforce compliance of safety and health requirements with an effective, graduated system of remediation and follow-up assessments.</li> </ul>	S	A	I	R	I	
		<ul style="list-style-type: none"> <li>The Company will communicate and at times coordinate with contractors and their workers about nonroutine and emergency hazards and emergency procedures when SIMOPS could present emergencies to multiple employers on Company site/s.</li> <li>Information is communicated as necessary before work on multi-employer sites starts, and as needed, if conditions change.</li> </ul>	S	A	C	R	I	
8.03	Coordination	<p>The Company and its contractors will coordinate work planning, scheduling, and resolving differences to identify and work out any concerns or conflicts that could impact safety or health.</p> <p><i>How to accomplish it</i></p> <p>The Company:</p> <ul style="list-style-type: none"> <li>Include any safety-related specifications and qualifications in contracts and bid documents and ensure that contractors selected for the work meet those requirements.</li> <li>Identify issues that may arise during on-site work and include procedures to be used by the Company and contractors to resolve conflicts before work starts.</li> </ul>	S	A	C	R	C	<a href="https://safehe.com">https://safehe.com</a>
		<p>The Company coordinates with contractors to:</p> <ul style="list-style-type: none"> <li>Ensure that work is planned and scheduled to minimize impacts on safety.</li> <li>Ensure workers are adequately trained and equipped before arriving on the worksite.</li> <li>Communicate the requirement that contractors adhere to their established health and safety programs.</li> <li>Communicate the Hazard Identification and Assessment program the Company will use to observe, assess, and communicate deficiencies when they arise.</li> </ul> <p>The Company and Contractors:</p> <ul style="list-style-type: none"> <li>Work together to deal with unexpected staffing needs by ensuring enough trained and equipped workers are available or that adequate lead time is provided to train and equip workers.</li> <li>Make sure managers with decision-making authority are available and prepared to deal with day-to-day coordination issues.</li> </ul>	S	A	R	RC	I	