



BP OIL -- TOLEDO REFINERY

Document Type: Program	Toledo Refinery	Reference No.:
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Owner: Robert Myak	Auth. By: (Signature on file)	Page 1 of 25

SCOPE	The program applies to all contractors, including subcontractors, performing work at BP-Husky Refining.
HEALTH Special PPE & Special Hazards	N/A
SAFETY	29 CFR 1910.119 Process Safety Management of Highly Hazardous Chemicals
REFERENCE DOCUMENTS	LOMS 2.5 WORKING WITH CONTRACTORS GRP 2.5-0001, BP Group Recommended Practice for Working with Contractors
SPECIAL MATERIALS & EQUIPMENT	N/A
QUALITY	N/A
ENVIRONMENTAL	N/A



INTRODUCTION

1.1 INTENT AND PURPOSE	
Intent	<ul style="list-style-type: none">The expectations at BP-Husky Refining are to have no accidents, no harm to people and no damage to the environment. The site is committed to the protection of the natural environment, to the safety of the community and to the health, safety and security of all who work in the facility. Everyone who works at BP-Husky Refining has the responsibility to help achieve these objectives. <p>The site recognizes the important role that contractors play in our operations and the need for contractors to perform their work in compliance with applicable health, safety, and environmental performance standards and requirements. This program provides the work process and requirements to assist the refinery and contractors in meeting these obligations.</p>
Purpose	<ul style="list-style-type: none">The purpose of this program is to provide reasonable assurance that contractors perform their work in compliance with applicable health, safety, and environmental performance standards and requirements.

1.2 SCOPE AND APPLICABILITY	
Scope	<ul style="list-style-type: none">The program applies to all contractors, including subcontractors, performing work at BP-Husky Refining.
Applicability of program elements	<ul style="list-style-type: none">This is a risk-based program. The applicability of the program elements and provisions to a contractor depends on the type of work to be performed and the potential risks associated with the work in terms of potential for impact to employees, contractor employees, customers, the environment and the community. There are more requirements and more robust requirements for contractors performing higher potential risk work than for contractors performing lower potential risk work.
Exception	<ul style="list-style-type: none">This program does not apply Third Party Employees. See definition below. “Third Party Employees” refer to employees/visitors who may be on site that are indirectly involved but not a principal party to the BP-Husky LLC site. (Examples include but not limited to: Delivery Personnel, Visitors, and Regulatory Representatives.)



1.3 PROGRAM ADMINISTRATION	
Administration	<ul style="list-style-type: none"> • The following roles are assigned for the overall administration of the program: <ul style="list-style-type: none"> ➢ Custodian: Contractor Management Program Superintendent ➢ Maintainer: Contractor Management Specialist <p>The Custodian is responsible for program content and management of program changes.</p> <p>The Maintainer is responsible for the maintenance and upkeep of the program, including regular reviews and audits.</p>
BP-Husky Contractor Records	<ul style="list-style-type: none"> • The Contractor Management Specialist (CMS) shall maintain an experience file for all contractors working in the refinery. As a minimum, the experience file shall contain: <ul style="list-style-type: none"> • Prequalification information • Waiver forms • Recordable injury log or equivalent • Applicable evaluations

1.4 MANAGEMENT OF PROGRAM CHANGES	
Management of Changes	<ul style="list-style-type: none"> • Changes to the program shall be managed and approved by the BP-Husky Contractor Management Custodian through the consensus of the Contractor Review Committee (CRC).
Communications to Contractors	<ul style="list-style-type: none"> • Changes to the program or site HSSE procedures affecting a contractor shall be communicated to affected contractors by the CMPS.

1.5 PROGRAM STRUCTURE	
Layout of Document	<ul style="list-style-type: none"> • The body of this document describes the overall work process and the specific elements and provisions. Forms needed to support the program elements are included in the appropriate section. The appendices include reference materials needed to successfully execute the program elements.
Language	<ul style="list-style-type: none"> • The following terms have specific meanings in this program: <ul style="list-style-type: none"> ▪ 'Shall' is used where a provision is mandatory. ▪ 'May' is used where a provision may be exercised or not, at the discretion of the Contractor Review Committee (CRC)



1.6 BP-HUSKY ROLED AND RESPONSIBILITIES	
Contractor Management Program Superintendent (CMPS)	<ul style="list-style-type: none"> 1. Key responsibilities for this role: 2. Manage program content. 3. Manage program changes. 4. Coordinate implementation. 5. Interpret program requirements. 6. Member of the CRC (Contractor Review Committee). 7. Maintain the program up-to-date through reviewing at least once every three years.
Contractor Review Committee (CRC)	<ul style="list-style-type: none"> • Key responsibilities for this committee: <ul style="list-style-type: none"> 1. Approve program development and program updates 2. Facilitate implementation of the program. 3. Provide oversight to assure program elements are effectively implemented. 4. Promote continuous improvement in contractor HSSE performance. 5. Establish HSSE performance criteria for the prequalification and bid processes. 6. Maintain the list of BP-Husky CAMS. 7. Provide oversight to assure that CAMS have the required training. 8. Provide oversight of the contractor audit and inspection systems and manage corrective actions.
Procurement	<ul style="list-style-type: none"> • Key responsibilities for this group: <ul style="list-style-type: none"> 1. Identify potential contractors for site work. 2. Coordinate with the BP-Husky CMS that the contractor prequalification information is obtained. 3. Issue bid packages for contractors and arranges for pre-bid meetings when needed. 4. Select contractor with input from the BP-Husky Job Rep and CAM when needed. 5. Issue contracts.
Contractor Management Specialist (CMS)	<ul style="list-style-type: none"> • Key responsibilities for this role: <ul style="list-style-type: none"> 1. Provide technical and functional support to the BP-Husky CMPS, CRC, and UIS Contractor Council. 2. Maintain the Avetta database 3. Maintain the "HSSE Approved Contractor List". 4. Maintain contractor management databases such as pre-qualification records, waiver forms, contractor HSSE data, evaluations, audits, etc. 5. Maintain the program up-to-date through reviewing at least once every three years.
Contract Accountable Manager (CAM)	<ul style="list-style-type: none"> • Key responsibilities for this role: <ul style="list-style-type: none"> 1. Assure that the contractor has clear understanding of BP-Husky HSSE requirements, policies, and performance expectations.



	<ol style="list-style-type: none"> 2. Meet with contractor as necessary to assess the contractor's progress at implementing its site safety plan and the effectiveness of the plan. 3. Conduct periodic meetings with contractor management to review, discuss, and evaluate contractor performance. 4. Review contractor incidents to insure they are properly investigated. 5. Participate as necessary in the contractor's investigations. 6. Review status reports from the contractor on closure of incident action items. 7. Where there is a violation by the contractor of BP-Husky procedures or policies, follow-up with contractor to insure necessary corrective action is taken to prevent recurrence.
<p>Job Representative</p>	<ul style="list-style-type: none"> • Key responsibilities for this role: <ol style="list-style-type: none"> 1. Participate in pre-bid meetings for large projects – as requested by the Procurement Department. 2. Assure that contractor employees complete site HSSE orientation prior to initial assignment at the site. 3. Conduct and document a pre-job meeting with the contractor (if applicable) to <ul style="list-style-type: none"> communicate with the contractor regarding the hazards at the job site as well as understand any hazards that may be brought on site by the contractor. 4. Interface with on-site contractor safety specialist (if applicable) on expectations, issues, and contractor compliance with requirements. 5. Conduct informal periodic job site reviews to monitor work in progress and assess contractor HSSE performance and compliance. Observations and deficiencies are communicated to contractor management and contractor safety specialist (if applicable) for follow-up. 6. Conduct periodic inspections to monitor contractor performance and address the deficiencies. 7. Conduct evaluations of contractor HSSE performance. The evaluations may be done at the completion of the job, the expiration of the contract, or periodically for nested contractors. The evaluation report may be issued to the contractor and the CMS for use as a measuring tool when considering the contractor for future work.

1.7 BP-HUSKY TRAINING

<p>Training</p>	<ul style="list-style-type: none"> • Individuals assigned to roles identified in section 1.6, shall be trained on the applicable elements of the program and on their specific roles and responsibilities.
<p>Retraining</p>	<ul style="list-style-type: none"> • Retraining is required when there are significant changes to the program or the responsibilities for the position.



1.8 CONTRACTOR ROLES AND RESPONSIBILITIES	
Contractor Contract Owner	<ul style="list-style-type: none"> • Key responsibilities for this role: <ol style="list-style-type: none"> 1. Identify the Contractor Job Representative. 2. Identify the Contractor HSSE Representative. 3. Provide appropriate oversight to assure the contractor meets the applicable HSSE performance and compliance requirements.
Contractor Job Representative	<ul style="list-style-type: none"> • Key responsibilities for this role: <ol style="list-style-type: none"> 1. Interface with the BP-Husky Job Rep and Contractor HSSE Rep on expectations and issues. 2. Provide daily oversight to assure the contractor meets the applicable HSSE performance and compliance requirements. 3. Conduct periodic inspections to monitor contractor performance and to address deficiencies.
UIS Contractor Council	<ul style="list-style-type: none"> • The Contractor Council, United In Safety, membership consists of contractor companies working at the refinery. Contractors will actively participate in the Council.

1.9 PROGRAM EFFECTIVENESS METRICS	
Measuring Effectiveness	<ul style="list-style-type: none"> • Metrics shall be established and used to measure the effectiveness of implementation and sustainability. The following “Leading Indicators” and “Lagging Indicators” may be used for this purpose:
Leading Indicators	<ul style="list-style-type: none"> • Field inspections • Near Miss Reporting • JSA’s • Performance evaluations completed • % Participation in the Contractor Safety Council
Lagging Indicators	<ul style="list-style-type: none"> • OSHA Recordable Incident Rate (RIF) • OSHA Day Away from Work Rate (DAFW) • Workers Compensation Experience Modification Rate (EMR)

1.10 EVALUATING PERFORMANCE OF CONTRACT EMPLOYERS	
Selection Process	<ul style="list-style-type: none"> • Prior to being approved to work on-site all contract employers shall be evaluated initially and annually thereafter to determine their ability to meet site requirements and work safely on-site. Evaluation shall consist of review of several metrics that include, but not limited to, the following: <ul style="list-style-type: none"> ➢ OSHA Recordable Incident Rate (RIF) ➢ OSHA Day Away From Work Rate (DAFW) ➢ Fatalities



	<ul style="list-style-type: none"> ➤ Experience Modification Rate (EMR) ➤ OSHA Citations ➤ HSE Program
Manual Audit	<ul style="list-style-type: none"> • All contractors assigned the risk level of PSM or Toledo Safety Sensitive shall receive a Manual Audit initially and every 3 years thereafter. For a Manual Audit the contractor's HSE manual shall be reviewed based on the type of work the contractor is qualified to perform. This audit performed shall confirm whether the contract employer has the required elements in their HSE program.
Implementation Audit	<ul style="list-style-type: none"> • All contractors assigned the risk level of PSM or Toledo Safety Sensitive shall receive an Implementation Audit initially and every 3 years thereafter. This audit shall confirm whether the contract employer has implemented their safety program and have required documents on file, such as training records and certifications.
PSM Verification Audits	<ul style="list-style-type: none"> • Contractor employers assigned as a Process Safety Risk shall receive a PSM Verification Audit every 3 years. This audit shall verify that the contract employer has implemented its HSE program and is meeting the requirements under the OSHA PSM Standard 29CFR 1910.119 paragraph "h". Process Safety Risk contractors shall be tagged in Avetta for a PSM Verification Audit based on their responses to specific PSM related questions in Avetta's PQF.

2.0 PROGRAM WORK PROCESSES FOR CLASSIFYING CONTRACTORS BASE ON RELATIVE RISK

Purpose	<ul style="list-style-type: none"> • The purpose for classifying contractor's work based on process safety risk and personal safety risk to contractor or company employees is an important consideration in determining how to apply the elements of the Contractor Management Program. The relative level of potential risk determines the depth of owner involvement with and oversight of the contractor. <ul style="list-style-type: none"> ❖ This section provides guidance on classifying contractors according to the relative level of risk so that the appropriate elements of the program are applied.
Process	<ul style="list-style-type: none"> • The first step is to identify the work that is to be performed on site. The Avetta program shall be utilized to perform this using the BP Toledo Specific PQF (Pre-Qualification Form). The classification shall be based on whether a contractor will be a PSM contractor and/or Toledo Safety Sensitive contractor. Responses to Toledo the specific section of the PQF shall be used to determine this (stated below).



Process Safety Risk	<ul style="list-style-type: none">• This shall apply to Contractors performing work or services on or adjacent to a covered process that may pose a process safety risk. They shall be identified as a PSM Contractor. Examples (including, but not limited to): maintenance or equipment repair, turnaround, major renovation or new construction. Contractors that perform incidental services that will not impact process safety which include, but not limited to, janitorial work, food and drink services, laundry, delivery and other supply services shall not be considered as PSM contractors.• The following questions in the Toledo Specific section of the PQF shall establish this. Answering “yes” to “1” shall establish the company as a PSM contractor for the site. <p>PSM (Process Safety Management)</p> <ol style="list-style-type: none">1. Will the work that your company will provide to the BP-Husky Toledo Refinery site take place on or adjacent to our covered process as defined by the OSHA PSM standard (29 CFR 1910.119 Process Safety Management of Highly Hazardous Chemicals)? Our “Covered Process” includes any operating unit within our “Processing Block” and this would apply to contractors performing maintenance or repair, turnaround, major renovation, or new construction on or adjacent to a covered process. It does not apply to contractors providing incidental services which do not influence process safety, such as janitorial work, food and drink services, laundry, delivery or other supply services. If yes, please answer questions “a” through “d”. If no, please skip to the next section.<ol style="list-style-type: none">a) Does your company train employees in the work practices necessary to perform their jobs safely?b) Does your company have documentation that shows employees have received and understood the training provided?c) Describe how your company verifies that its employees are instructed in the known potential fire, explosion, or toxic release hazards and the applicable provisions of the emergency action plan.d) Describe how your company informs BP-Husky of any unique hazards associated with the company’s work activities.
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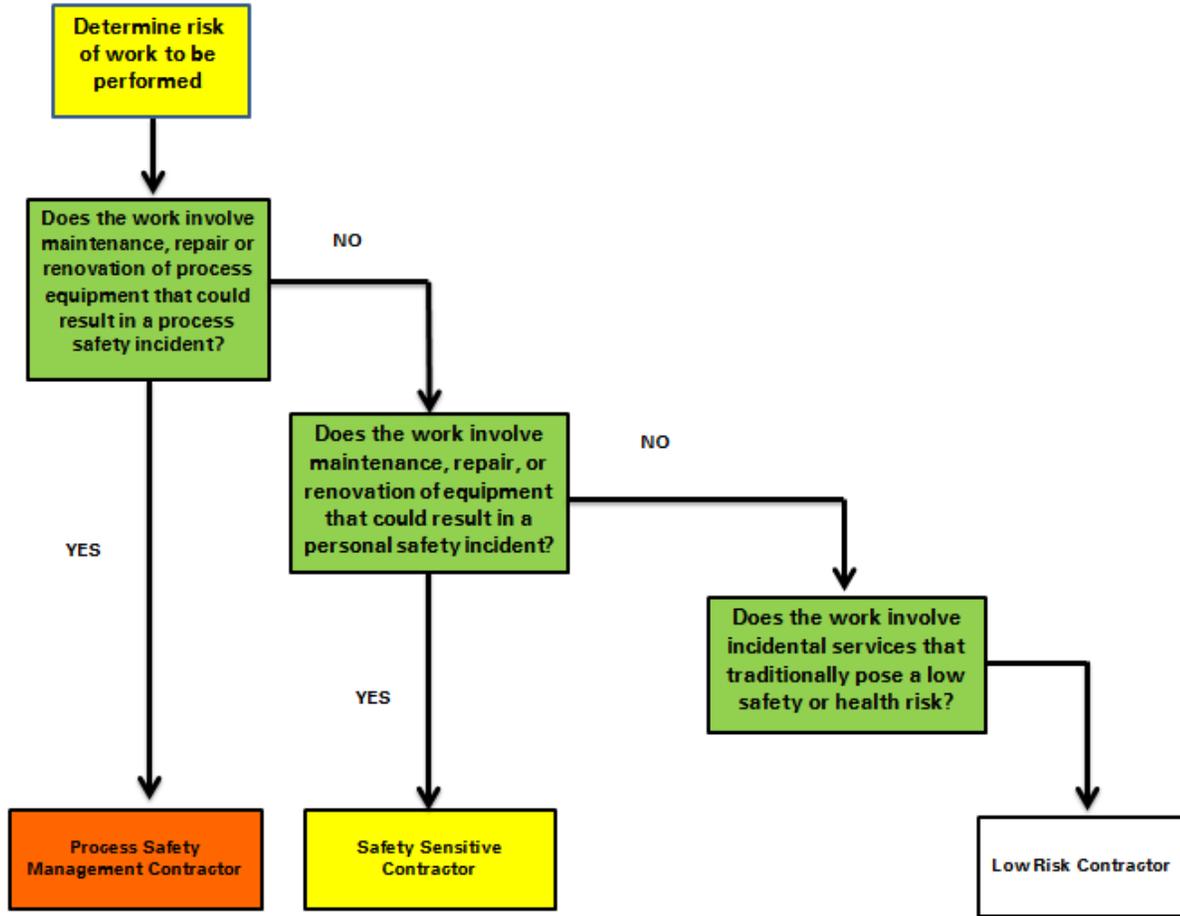
<p>Personal Safety Risk</p>	<ul style="list-style-type: none"> • This shall apply to Contractors performing work or services that introduce employees to a significant safety or health risk. This includes hazard producing services and/or work in and around process units that do not pose a process safety risk, which also includes: • Contractors performing services or work that creates a higher risk for incident or accident. These contractors shall be identified as Toledo Safety Sensitive. Examples (including, but not limited to):, confined space, demolition, lockout/tagout, work at heights, mobile crane operation, electrical work, hazardous waste operations, hot work, work on, over or under water, rigging or trenching and excavations. Contractors whose work or services traditionally poses a low safety or health risk shall be considered non-safety sensitive. Examples (including, but not limited to): General Office janitorial, engineering (drafting, plans, etc.), lawn care/lawn maintenance (excluding landscaping), IT (information technology, software development), office equipment repair (minor repair services), uniform laundry. • The following questions in the Toledo Specific section of the PQF shall establish this. Answering “no” to “a” or “yes” to any of these questions shall establish the company as a “Toledo Safety Sensitive Contractor” for the site. <ol style="list-style-type: none"> 1. Below is the list of the questions will be added to the BP-Toledo PQF section. <ol style="list-style-type: none"> a) Can all of the work you perform or the services you provide be conducted in administrative areas at all times? (<i>do not include traveling through the Process Block to get to the jobsite as part of the work area</i>) (Examples include: Office Janitorial, Sales Representative, Office administration, Laundry service, and vending machine sales/service, etc.) <p style="text-align: center;">Yes – Non -Safety Sensitive No –Safety Sensitive</p> b) Are your employees required to wear any specialized PPE (not including mandatory PPE items including such as safety boots, safety glasses, and gloves)? (Examples include, but are not limited to Respirators, Fall Protection, Welding Helmets/goggles, Chemical Protective Clothing, etc.) <p style="text-align: center;">Yes – Safety Sensitive No – Non-Safety Sensitive</p> c) Do any of your employees ever use power, pneumatic or hydraulic tools (e.g. drills, circular saws, jackhammers, grinders etc.) (<i>Do not include residential or household items like a vacuum cleaner</i>)?
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	<p>Yes – Safety Sensitive No – Non-Safety Sensitive</p> <p>d) Are your employees required to complete or obtain a “permit to work” in order to conduct any of your operations on site (e.g. confined space permit, Hotwork permit, etc.)?</p> <p>Yes – Safety Sensitive No – Non-Safety Sensitive</p> <p>e) Do your employees operate any heavy mobile equipment or specialized vehicles to carry out your operations on site (e.g. cranes, forklifts, aerial lifts/ elevated work platforms, bulldozers, bobcats, front end loaders, excavators, etc.)</p> <p>Yes – Safety Sensitive No – Non-Safety Sensitive</p> <p>f) Will your employees perform on site any of the following: abatement/remediation (asbestos/lead), working in confine space, demolition, performing lockout/tagout activities, working at heights, mobile crane operation, electrical work, hazardous waste operations, hot work, work on, over or under water, rigging, or trenching and excavations?</p> <p>Yes – Safety Sensitive No – Non-Safety Sensitive</p>
<p>Level of Risk</p>	<ul style="list-style-type: none"> • Based on the evaluation, the contractor’s work shall be identified as: <ol style="list-style-type: none"> 1. PSM contractor versus non-PSM contractor 2. Toledo Safety Sensitive contractor versus non-Safety sensitive contractor • If a company is determined not to be either a PSM or Toledo Safety Sensitive contractor and the work is considered to be low risk for the site, then a CCQ (contractor capability questionnaire) will be filled out and kept on file for the site. This form will be re-submitted annually. <p>In determination of a Contractor’s Work Risk the following Flowchart is used in determination of a Contractor’s Process or Personal Safety Risk.</p>



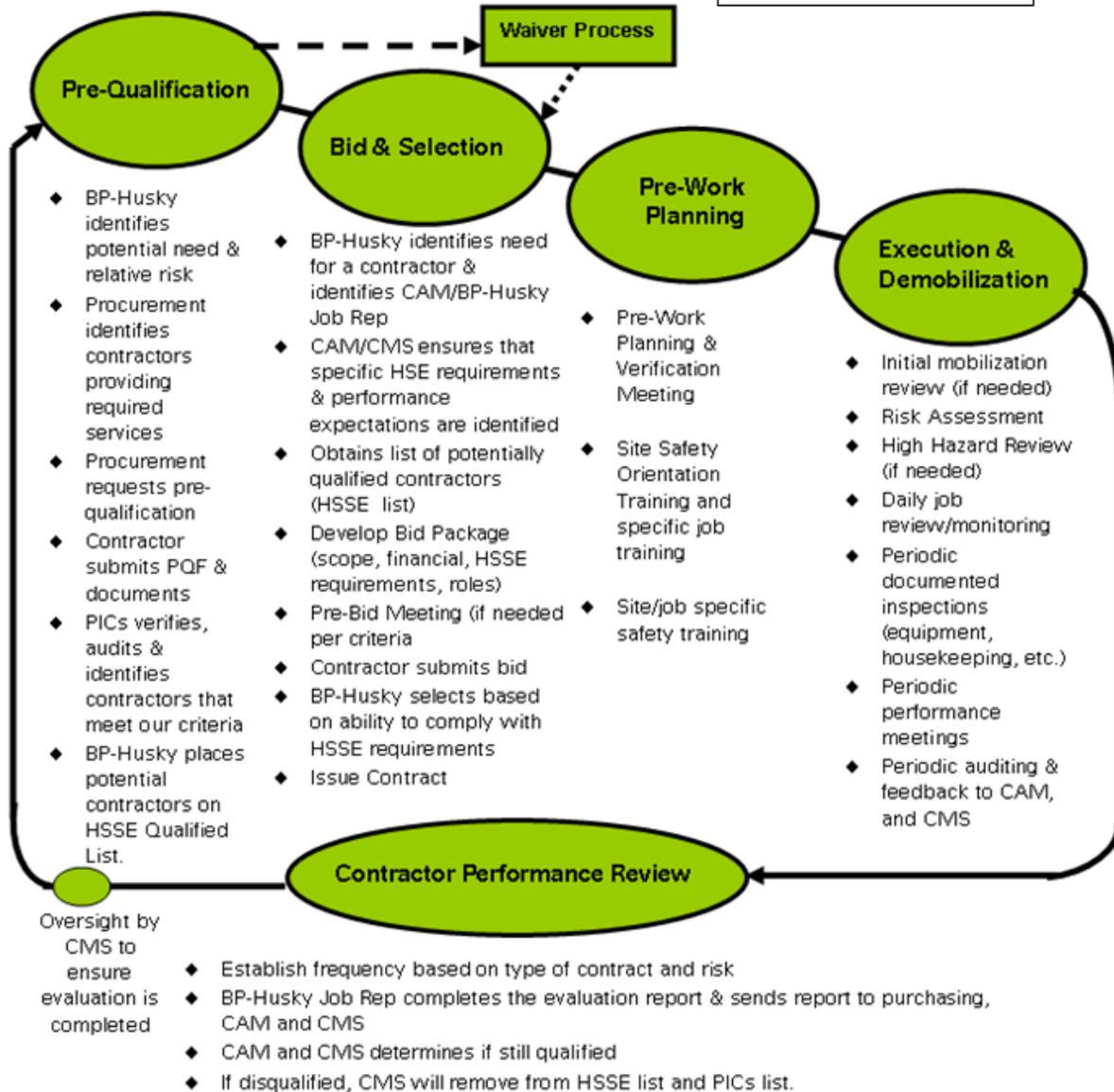
CONTRACTOR CLASSIFICATION FLOWCHART





2.2 WORK PROCESS FOR WORK CLASSIFIED AS PSM OR SAFETY SENSITIVE RISK

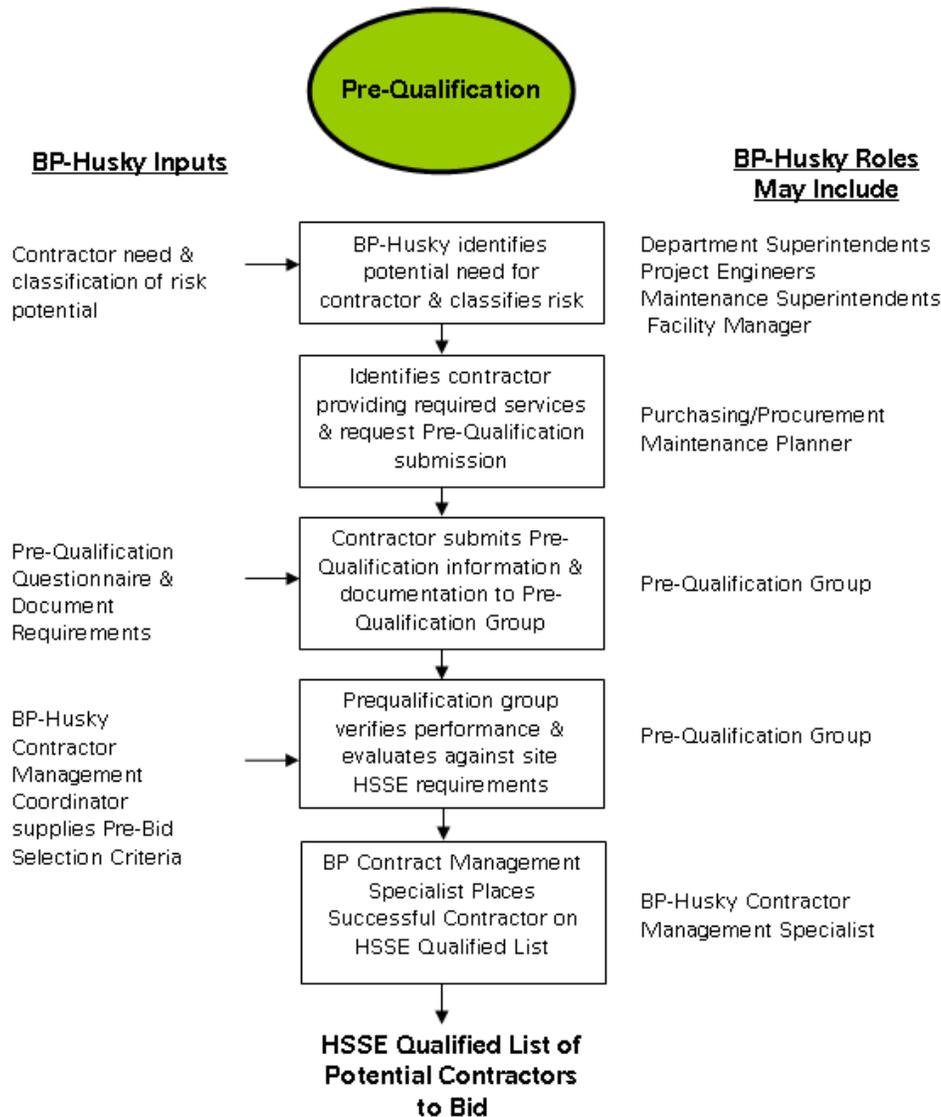
PROCESS FOR PSM OR SAFETY SENSITIVE WORK





3.0 PROGRAM ELEMENTS

3.1 PRE-QUALIFICATION REQUIREMENTS

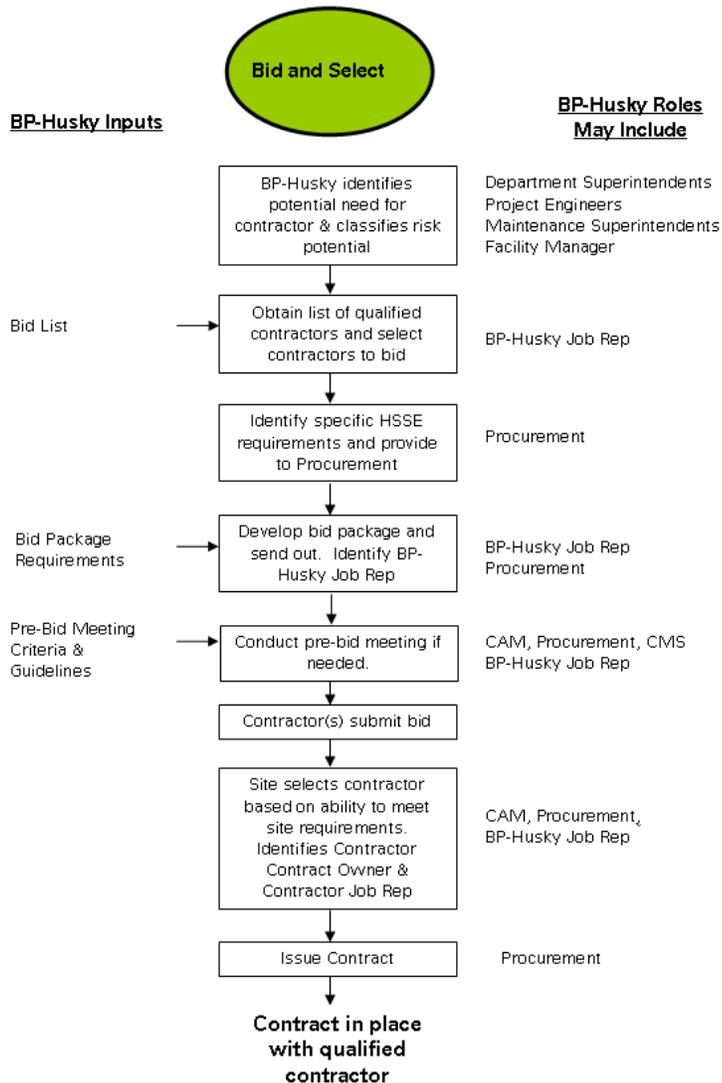


Pre-Qualification Elements	<ul style="list-style-type: none"> • A minimum pre-qualification shall consist of an assessment of the contractor's ability to meet the applicable: <ul style="list-style-type: none"> ◆ Site HSSE performance standards ◆ General HSSE requirements Ability to speak and read English proficiently
Requesting Contractor	<ul style="list-style-type: none"> • Potential contractor employers are identified based on site needs. The Procurement Department or the Contractor Management



Information	Specialist makes the request to the contractor company to enter the required HSSE information into the AVETTA database. The specific HSSE information required is based on the relative risk associated with the work that the contractor is to perform.
Pre-Qualification Review	<ul style="list-style-type: none"> • AVETTA shall evaluate and verify the pre-qualification information submitted by potential contractor.
HSSE Qualified	<ul style="list-style-type: none"> • Notification of status shall be communicated to the contractor and the BP-Husky Contractor Management Specialist by AVETTA. ➤ Contractors meeting site HSSE performance standards and requirements shall be placed on the “HSSE Qualified List” by the CMS.

3.2 BID AND SELECT





3.2.1 REQUEST FOR CONTRACT PROPOSAL	
Invitation to Bid	<ul style="list-style-type: none"> • Pre-qualification is designed to provide information about a contractor’s ability to comply with general safety and health requirements. <p style="text-align: center;">The invitation to bid request shall ensure that the prospective contractor is fully informed of the scope of the work and site HSSE requirements when preparing the bid for a contract.</p>
Bid Package Requirements	<ul style="list-style-type: none"> • Procurement shall issue the bid package to prospective contractors. The bid package may include the following: <ul style="list-style-type: none"> ◆ Scope of work. ◆ Significant potential hazards (e.g., fire, explosion, toxic release) related to the contractor’s work. ◆ BP-Husky’s coordination role. ◆ Site HSSE requirements. ◆ Sub-contractor requirements, including the need to disclose all subcontractors. ◆ Contractor equipment integrity verification prior to start of work. ◆ An HSSE plan that the contractor shall use to meet the site HSSE performance standards and requirements. Note: Applies to contractors performing work classified as High Risk potential.
Pre-Bid Meetings	<ul style="list-style-type: none"> • Pre-bid meetings may be conducted to provide prospective bidders with an opportunity to evaluate job-site conditions and to obtain clarification of the work scope and the site HSSE requirements. It provides the site with a forum to elaborate on the requirements in the bid document. <p style="text-align: center;">The BP-Husky Job Rep shall determine the need for pre-meeting for other situations on a case-by-case basis.</p>
Contractor HSSE Plan	<ul style="list-style-type: none"> • The HSSE plan may be submitted with the contractor’s bid. The plan shall address: <ul style="list-style-type: none"> ▪ Contractor HSSE rep on the site. ▪ Methods to ensure the ability to meet the site’s HSSE performance standards and requirements. ▪ Method of assuring that sub-contractors meet the site’s HSSE performance standards and requirements and are on the site “HSSE Qualified List”. ▪ Method to ensure the safety of “short service employees” (contractor employees with less than 12 months experience in the same job type or with the present employer).



	<ul style="list-style-type: none"> ▪ Measurement and tracking system to ensure the plan is executed in the field. This includes safety meetings, field safety tours, and regular inspections. ▪ Personal Protective Equipment (PPE) management. ▪
Site HSSE Requirements	<ul style="list-style-type: none"> • The BP-Husky Job Rep shall identify the specific contractor HSSE requirements based on the nature and location of the work to be performed.
General Selection Criteria	<ul style="list-style-type: none"> • The Contractor Selection process shall be conducted in compliance with the BP Code of Conduct. <ul style="list-style-type: none"> ❖ Contractors shall be selected based on consideration of commercial, technical, and HSSE aspects of the bid. The ability of contractor to meet HSSE requirements shall be a significant factor and have a commensurate rating in the overall evaluation criteria.
Selection	<ul style="list-style-type: none"> • Procurement, the CAM, and BP-Husky Job Rep shall review the bid proposals and supporting documentation and select the contractor based on the ability to meet the site HSSE performance standards and requirements.

3.2.2 CONTRACTOR SELECTION

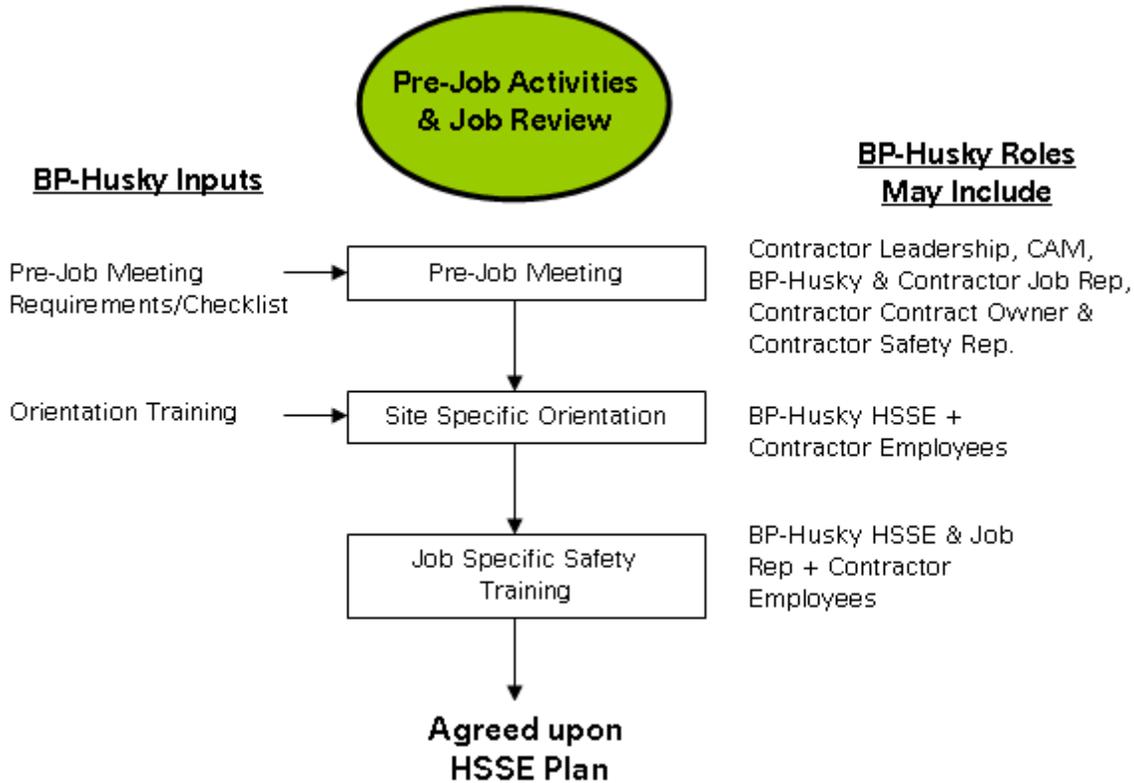
Waiver Process	<ul style="list-style-type: none"> • In some cases, it may be necessary to select the contractor based on the ability to meet site HSSE performance standards and requirements. A waiver shall be requested when contractor services are needed in short notice which does not permit a complete pre-qualification. <ul style="list-style-type: none"> ❖ Members of the CRC shall approve and document the waiver. Approved waivers are maintained on file by the CMS.
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3.2.3 CONTRACTOR REQUIREMENTS

General Requirements	<ul style="list-style-type: none"> • Contracts shall clearly define HSSE requirements and responsibilities and establish and define the relationship between the contractor and site.
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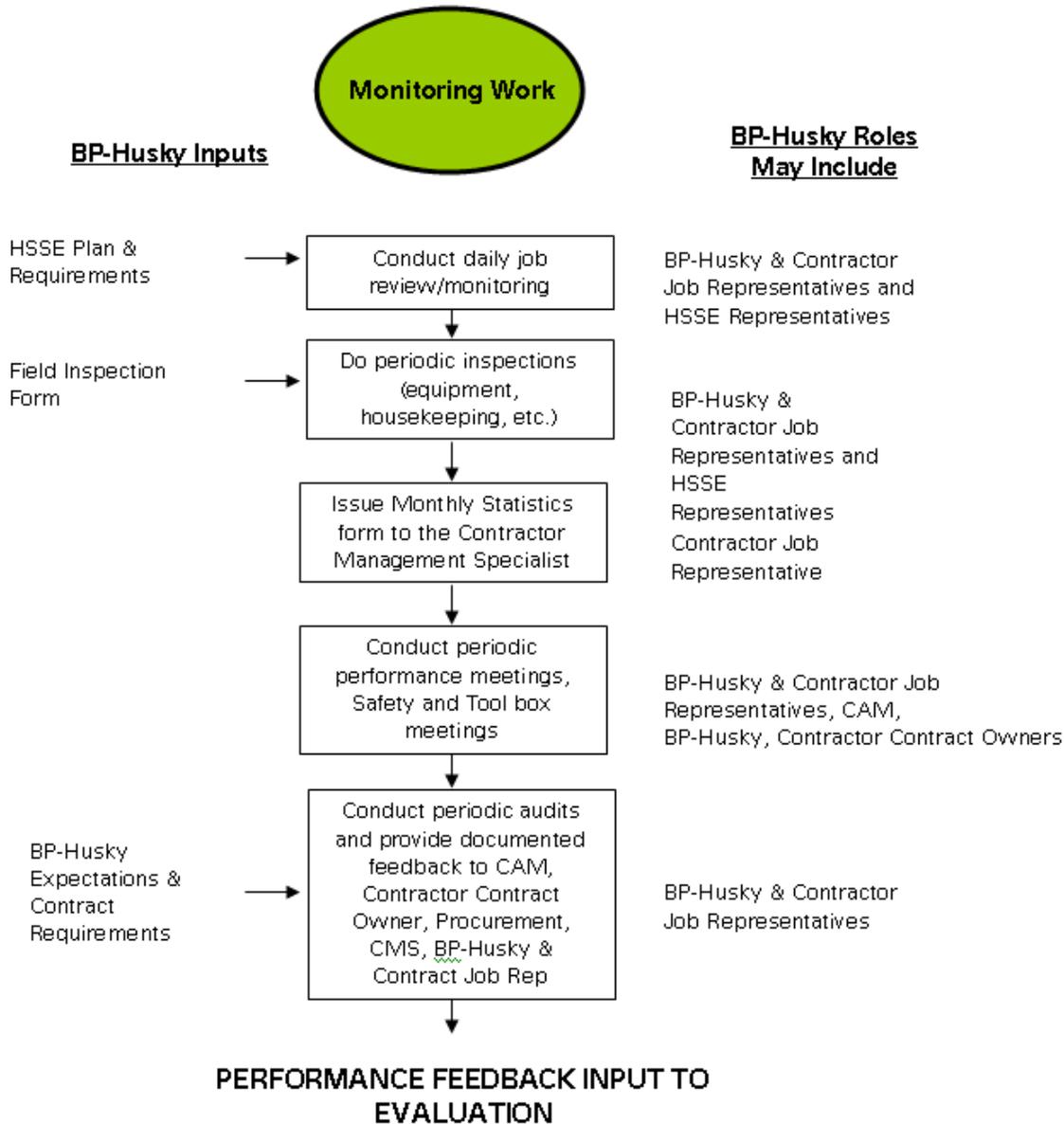
3.3 PRE-WORK ACTIVITIES AND REVIEW MEETING (MOBILIZATION)



<p>Pre-Job Meeting: Purpose</p>	<ul style="list-style-type: none"> The purpose of the pre-job meeting is to: <ul style="list-style-type: none"> ◆ Provide on-site orientation for the contractor and to verify the contractor's ability to comply with regulatory and site HSSE requirements specific to the scope of work. ◆ Communicate with the contractor regarding the hazards at the job site and for the contractor to communicate any hazards that would be brought on-site by the contractor. ◆ Obtain agreement between site and the contractor on the HSSE plan to ensure the work can be safely executed.
<p>Pre-Job Meeting: Scope</p>	<ul style="list-style-type: none"> This pre-job meeting applies primarily to new contracts and contractors that have not worked at the site within the past 12 months. It may also be used for existing contractors if audits, evaluations, or other information indicates the need.
<p>Pre-Job Meeting: Participants</p>	<ul style="list-style-type: none"> The pre-job meeting shall be conducted by the BP-Husky Job Rep and the Contractor Job Rep. The BP-Husky Job Rep may include the following participants depending upon the scope of work, duration of the work, and the relative level of risk associated with the work: <ul style="list-style-type: none"> ◆ Contractor Job Rep ◆ CAM



	<ul style="list-style-type: none"> ◆ Site maintenance representatives ◆ Site operations representatives ◆ Area safety advisor ◆ Environmental representatives
Pre-Job Meeting: Contractor Documentation	<ul style="list-style-type: none"> • The contractor may provide the following documentation for the pre-job review meeting, as applicable: <ul style="list-style-type: none"> ➤ Proposed HSSE Plan. ➤ A list of portable equipment/tools that the contractor will be bringing on site including the intended service. ➤ Verification that portable equipment/tools meet integrity requirements and have not been altered or modified from the manufacturer's specifications. ➤ Inspection records for lifting equipment such as cranes and forklifts. ➤ Verification that personnel lift equipment is being used as intended by the manufacturer. ➤ Verification of electrical generating equipment integrity by a certified electrician. ➤ Verification that pressure equipment meets regulatory standards. ➤ Craft skills verification. ➤ Verification that subcontractors are on original proposal and on the HSSE Qualified list.
HSSE Orientation Training	<ul style="list-style-type: none"> • All contractor employees, including subcontractors, shall receive site HSSE orientation training prior to starting work at the site. <p>The HSSE training shall address:</p> <ul style="list-style-type: none"> ▪ An overview of the refinery and potential HSSE risks ▪ Site policies and procedures that address potential HSSE risks ▪ Site emergency procedures <p>The contractor employees shall demonstrate an understanding of BP-Husky's HSSE expectations prior to beginning any work.</p> <p>The site HSSE orientation training shall be completed for each contractor employee at least every 12 months.</p>
Substance Abuse Testing	<ul style="list-style-type: none"> • All contractors shall be tested for substance abuse as part of the HSSE orientation training. Contractors who fail the substance abuse testing shall not be allowed on the site. The substance abuse testing shall be completed for each contractor employee at least every 12 months.
Badges	<ul style="list-style-type: none"> • Contractor employees shall be issued a badge for site access after successfully completing the HSSE orientation training. Badges are to be worn at all times while on site.



3.3.1 CONTRACTOR MONITORING	
Initial Mobilization Review	<ul style="list-style-type: none"> In accordance to the contract, once the contractor and equipment is on site, the Contractor Job Rep shall conduct a mobilization review to assure that the equipment being furnished by the contractor meets regulatory and site requirements.
Job Site Reviews	<ul style="list-style-type: none"> The BP-Husky Job Rep, Contractor Job Rep, and the Contractor HSSE Rep may conduct job site reviews to monitor compliance with site HSSE requirements. The level of monitoring depends on the level of risk associated with the work that the contractor is performing. Observations and deficiencies are reported to the



	appropriate contractor managers. Serious conditions or non-compliances are corrected immediately.
Periodic Inspections	<ul style="list-style-type: none"> • For nested contractors classified as PSM or Toledo Safety Sensitive, the BP-Husky and Contractor Job Rep shall conduct periodic HSSE field inspections of the physical facilities and work practices, e.g.: <ul style="list-style-type: none"> ◆ Housekeeping ◆ Tools and portable equipment ◆ PPE usage ◆ Scaffolds • Contractors shall develop action plans to correct deficiencies and provide status updates to the BP-Husky Job Rep or CAM.
Monthly HSSE Performance Data	<ul style="list-style-type: none"> • Nested Contractors shall submit monthly HSSE performance data to the BP-Husky Contractor Management Specialist using the Monthly Contractor HSSE Performance form.

3.4 CONTRACTOR PERFORMANCE REVIEWS	
Evaluation Frequency	<ul style="list-style-type: none"> • The evaluation frequency for contractors shall be established by the BP-Husky Job Rep, and/or the CAM, and the Contractor Management Specialist at intervals at a minimum of at least one every 12 months.
Evaluation Criteria	<ul style="list-style-type: none"> • The evaluation may address: <ul style="list-style-type: none"> ▪ Contractor management's HSSE commitment ▪ Contractor's execution of the HSSE plan ▪ HSSE performance ▪ Compliance with regulatory and site HSSE requirements ▪ Use of proper safety equipment and PPE ▪ Promptness and effectiveness in implementing corrective actions for identified deficiencies ▪ Effectiveness of communication to the work force • The evaluation shall be documented using the Contractor Evaluation form.
Evaluation Results	<ul style="list-style-type: none"> • As a result of the evaluation, the CAM shall: <ul style="list-style-type: none"> ◆ Recommend that contractor remain on the "Approved Bid List" ◆ Place the contractor on probation ◆ Recommend dismissal



	<ul style="list-style-type: none"> • The decision shall be documented on the Contractor Evaluation form and communicated to: <ul style="list-style-type: none"> ▪ Procurement ▪ BP-Husky Job Rep ▪ Contractor Job Rep ▪ Contractor Management Specialist • The Contractor Management Specialist shall maintain the document on file.
<p>Probation</p>	<ul style="list-style-type: none"> • A Contractor may be placed on “probation” by the CRC for failure to meet the site’s HSSE performance standards and requirements and removed from the Approved Bid List. • The contractor shall conduct an investigation to determine and document the causes for failure to perform. The contractor shall develop an action plan to address the identified causes to include: <ol style="list-style-type: none"> 1. Corrective actions to address the identified causes 2. Assigned responsibilities and completion dates for corrective actions 3. Key indicators to monitor improvement • The contractor shall submit quarterly action plan status reports to the CAM. At the end of the twelve months, the CRC shall evaluate the contractor’s progress and ability to meet the site’s HSSE performance standards and requirements. • The Contractor Review Committee shall determine whether the contractor is placed back on the Approved Bid List or dismissed. The decision shall be documented and communicated in writing to the Contractor by the CAM.
<p>Reinstatement Criteria</p>	<ul style="list-style-type: none"> • Contractors that have been dismissed for failure to meet the site’s HSSE performance standards and requirements shall be informed of the specific deficiencies by the CRC. The Contractor may apply for reinstatement to the approved bid by meeting the following requirements: <ol style="list-style-type: none"> 1. The Contractor shall provide a minimum time period before applying for reinstatement to allow sufficient time to correct deficiencies. The minimum time period shall be established by the CRC based on the severity of the violation(s). 2. The contractor shall provide a written document to the Contract Review Committee that demonstrates how identified deficiencies have been corrected. 3. The contractor shall complete a satisfactory audit of their



	<p>health and safety programs at other sites where the contractor is performing work and provide the results to the Contractor Management Specialist.</p> <p>4. The Contractor shall have a written approval by the Contractor Review Committee before applying for reinstatement.</p>
Lessons Learned	<p>The lessons learned from performance evaluations, investigations, and verification activities shall be documented by the Contractor Management Specialist and used in improving Contractor performance both within the existing contract period and for future contractor performance and selection.</p>

4.0 DEFINITIONS

Approved HSSE Contractor List

A site list that includes all qualified and approved contactors for bidding on jobs.

Avetta (Pacific Industrial Contractor Screening (PICS))

A third party vendor contracted to conduct desktop audits of Contractor Companies to determine if their HSSE Programs and Performance Statistics meet baseline requirements that qualify them to be considered for approval to work at BP-Husky

Avetta (PICS) Desktop Assessment / DocuGUARD Pre-Qualification:

Avetta (PICS) shall review and verify the vendors' Pre-qualification Forms (PQFs) through public records, verifying safety statistics, regulatory citations, and other publicly available data. The PQF as well as the Annual Update is updated during January and February of each year by the vendor and verified by Avetta (PICS)

Avetta (PICS) Implementation Audit:

The Implementation Audit is a review of the documentation of the implementation of the safety manual on onsite safety-sensitive vendors on BP's vendor list. Implementation Audits shall be performed using a combination of on-site visits and web-conferences, and shall review training records, employee files and inspection logs of vendors

Avetta (PICS) Manual Audits / AuditGUARD:

The manual Audit is a detailed review of the vendor's safety manual, establishing minimum requirements to work at the relevant BP business unit. Avetta (PICS) shall perform the Manual Audit on vendors that perform safety-sensitive services to BP business

Avetta (PICS) Update Pre-Qualification:

Annual review to ensure that pre-qualification assessments still represent Contractors management systems and performance



BP-Husky Job Representative

An employee who has been assigned accountability to interface with the contractor over its fulfillment of its responsibilities under the contract and this program. This individual is designated to be the primary on-site job contact for a contractor and to provide daily oversight to assure that the contractor meets applicable HSSE performance and compliance requirements.

The assignment of BP-Husky Job Representatives depends on the type of contractor being used. Typical BP-Husky Contractor Job Representatives for the site are as follows:

1. Maintenance – Maintenance Supervisor
2. Operations Services – Asset Coordinator
3. Facility Services – Facility Supervisor
4. Engineering Projects – Project Engineer
5. Specialty (Fire protection, etc.) – Functional Owner or Designee

Competent Person

An individual who can demonstrate sufficient professional or technical training, knowledge, actual experience, and authority that enables them to carry out their assigned role

Contractor

All companies, firms, and individuals who contract with BP-Husky Refining LLC., and who perform services at the refinery. The contract can be formal, informal, written or verbal.

It includes contractors, self-employed contractors, subcontractors, working on construction, maintenance/repair, major renovation, or turnaround in or around process equipment, laboratories, pipelines, terminals, utilities, and other petroleum and petrochemical facilities and equipment. The term contractor includes subcontractors, short term contractors, and small contractors.

Contract Accountable Manager (CAM)

Refers to an employee implementing the contract on BP-Husky's behalf to provide a single point of contact to Contractor Companies for communication related to operational and HSSE performance. See BP-Husky Contract Accountable Manager List for the current list of managers and their respective Contractor Company. They are accountable for:

- contractor performance and delivery
- acceptance of goods and services

This individual is accountable to assure that the contractor meets the applicable site HSSE performance and compliance requirements.



The assignment of Contractor Accountable Managers is made by the CRC and is based on the qualification of the individual and type of contractor being used. Typical Contractor Accountable Managers for the site are as follows:

- Maintenance – Maintenance Superintendent or Supervisors
- Operations Services – Asset Superintendent(s)
- Facility Services – Facility Supervisor
- Engineering Projects – Project Superintendent or Engineer
- Specialty (e.g., Fire Protection) – Functional Owner

Contractor Employees

Refers to the individuals who work for such Contractors or for their Subcontractors

Contractor Job Representative

A contractor employee who has been assigned accountability by the contractor for the performance of the work and to interface with the BP-Husky job representative.

Emergency Work

Work that has not been anticipated by the site and for which no contractors have been pre-qualified or selected.

Experience Modification Rate (EMR)

A Workers Compensation insurance premium adjustment that anticipates future performance based on past experience. A low EMR (below 1.0) implies good historical safety performance.

Major Incident

An incident resulting in a worker fatality, injury involving hospitalization of 3 or more employees, a loss of \$200,000 in equipment, a spill of chemicals or oil in excess of the EPA reportable quantity, or any incident which resulted in adverse media publicity.

Nested or Resident Contractors

Contractors who are on-site for long-term projects. Resident contractors provide services for an extended period of time in the facility. This includes contractors who may be in and out of the site, but regularly in the plant (e.g. vacuum truck drivers, etc.).

Non-Nested or Non-Resident Contractor

Contractors who are on site for short-term highly specialized jobs or jobs of short duration.



OSHA Incident Rate

The OSHA incident rates are equivalent to the number of injuries per 100 employees or injuries/illnesses per 200,000 hours worked. OSHA requires this information on the OSHA 300 log.

Prequalification Form (PQF)

A form used to collect information from a potential contractor in order for the site to evaluate the contractor’s ability to meet the site’s HSSE performance standards and requirements.

Prequalification Group

A third party used to manage the prequalification provisions of this program.

Short Service Employee

A contractor employee with less than 1 year experience in the same job type or with their present employer.

Subcontractor

An individual or company hired by a contractor to perform a specific task as part of the overall work scope.

Tendering

An offer to buy materials or services. Request for a bid form from a potential contractor.

Third Party Employees

Refer to employees/visitors who may be on site that are indirectly involved but not a principal party to the BP-Husky LLC site. (Examples include but not limited to: Delivery Personnel, Visitors, and Regulatory Representatives.)

Revision history

The following information documents at least the last 3 changes to this document, with all the changes listed for the last 6 months.

Date	Revised By	Changes
5/24/2017	Robert Myak	- SECTION 1.1 PSM VERIFICATION AUDITS - SECTION 2.0 PROGRAM WORK PROCESSES FOR CLASSIFYING CONTRACTORS BASE ON RELATIVE RISK

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