

Centennial Management System

Short description

The Centennial HSEQ Management and Responsibility section governs the requirements for organizational support and implementation of the HSEQ management system and describes the process for auditing and continuous improvement.

Contact person

Andrew Richardson

Name

770-613-2999

Phone number

HSEQ

Functional Department

arichardson@cce-inc.com

Email address

Responsible

Brent LeVander

Name

HSEQ

Functional Department

Approval

Mark Bailey

Name

President and CEO

Title

Content

1	Objectives and area of application.....	3
1.1	Specific HSEQ objectives.....	3
2	Superior and additional applicable documents.....	3
3	Definitions.....	4
4	Centennial HSEQ vision statement.....	4
4.1	Managerial responsibility and authority.....	4
5	Strategic planning for HSEQ.....	5
5.1	HSEQ strategic objectives.....	5
5.2	HSEQ strategic meetings and forums.....	6
5.2.1	Annual strategic focus.....	6
5.2.2	HSEQ Monthly Meetings.....	6
5.2.3	Executive Management Meeting.....	6
6	HSEQ auditing and management review.....	6
6.1	HSEQ gap analysis.....	6
6.1.1	HSEQ gap analysis objectives.....	6
6.1.2	HSEQ gap analysis review.....	7
6.1.3	HSEQ gap analysis evaluation.....	7
7	Amendment History.....	7
8	Appendix.....	7

1 Objective and area of application

Centennial's objective regarding HSEQ management is to demonstrate the highest level of commitment from leadership in promoting the success of our HSEQ management system. Achieving our objective requires courageous leadership and commitment. This means establishing and demonstrating clear expectations, roles and responsibilities for employees and managers at all levels of the organization.

Centennial recognizes that leaders must take action in creating and promoting a safe workplace. This may be achieved through visible and participative leadership such as project pre-planning, being actively involved in field operations and interacting positively with employees and business partners to coach them and encourage safety behaviors.

Safety and health responsibility and accountability include the selection, training and evaluation of workers, supervisors, managers and subcontractor partners. Centennial will continuously improve our overall HSEQ performance by learning from our experiences and involving workers and other appropriate resources in the design, implementation and evaluation of those projects and activities which support the company's HSEQ vision.

1.1 Specific HSEQ Objectives

- Centennial's specific HSEQ target objectives include:
 - Reducing damage to people, property, the environment, the integrity of our work product and company operations during the course of our business activities
 - Planning for HSEQ by setting targets and objectives, identifying hazards, assessing risks and establishing standards against HSEQ performance may be measured
 - Demonstrating continual and constant awareness of HSEQ performance.
 - Providing HSEQ training and awareness to proactively manage risks and conditions
 - Ensuring that employees and business partners may voice HSEQ concerns without the fear of negative consequences or reprisal
 - Allocating adequate resources to effectively implement Centennial's HSEQ management system
 - Anticipating, preventing, managing and mitigating HSEQ risks associated with the use of contracted services and supplies
 - Identifying and implementing preventative and corrective measures to continually improve our HSEQ performance

2 Superior and additional applicable documents

1000_GP_11_01_en_5.0 Global Policy on Health, Safety, Environment/Sustainability and Quality (HSEQ)

1000_GS_11_06_en_1.0 Global HSEQ Standard on HSEQ Management Review

1000_GS_11_13_en_1.0 Global HSEQ Standard on HSEQ Leadership Engagement

1000_GS_11_14_en_1.0 Global HSEQ Standard on Subcontractor Management

1000_GS_11_17_en_1.0 Global HSEQ Standard on Communication

1000_GS_11_20_en_1.0 Global HSEQ Standard on Legal Register

1000_GS_11_27_en_1.0 Global HSEQ Standard on Management of Change

This manual applies to all Centennial employees and subcontractors who are performing work on a Centennial project site and may be potentially exposed to hazards during the course of his or her work. There may be more stringent requirements than what is stated in this manual as defined by specific State, local or contract specific requirements. If there is a conflict between this manual and other applicable regulations, the most stringent will apply.

3 Definitions

The following definitions of terms are important for an understanding of this Section.

Term	Definition
Centennial	All Centennial employees, joint venture employees, subcontractors and business partners
HSEQ	Health, Safety, Environment and Quality
PPE	Personal Protective Equipment
PSO	Project Safety Officer

4 Centennial HSEQ Vision Statement

The protection of personal health and safety, the environment and the integrity of the quality of our work rank at the highest level of importance to Centennial. We operate in a diligent and responsible manner consistent with the highest industry standards and aligned with our previously stated HSEQ objectives and management systems. Centennial empowers and supports our employees and business partners in their ongoing efforts to prevent incidents of all kinds. Centennial uses a comprehensive HSEQ management system to demonstrate our commitment to health, safety, the protection of our environment and quality management to validate and fulfill our HSEQ objectives while adding value to our customers and the community in which we work.

To be successful, the Centennial HSEQ Management and Responsibility Section demands the proper approach and commitment towards injury and illness prevention on the part of executive leadership, managers, supervisors, employees and our business partners. The success of the overall system also requires cooperation in all HSEQ matters, not only between executive leadership, management, supervisors and employees, but also between each employee and subcontractor partner. Cooperation among our employees, management business partners and customers in the observance of this section will promote safe-working conditions, inadvertent damage to the environment, quality defects and will work to our mutual advantage by reducing risk and losses. This is further described in the Centennial HSEQ Policy (Appendix 1).

4.1 Managerial Responsibility and authority

Each level of management for Centennial is personally and corporately accountable for the safety and health of his/her employee's and contracted worker's HSEQ performance. Executive management will provide leadership and will assume overall responsibility for

implementing and monitoring the safety performance of the Centennial HSEQ management system. Each individual with leadership responsibility within the organization must assume an active role in identifying hazards, pre-planning for HSEQ, ensuring all required PPE, safety equipment and HSEQ training is provided for employees. PSOs, Project Managers and superintendents are responsible for monitoring and guiding the projects for safety performance and immediately correcting safety deficiencies, acting as partner with the management team.

HSEQ responsibility and accountability rests with the business unit manager, project manager and project superintendent. For each business unit location, a PSO is appointed to act as a resource to the project manager and superintendent. In addition, there is a dotted line to the HSEQ Director.

HSEQ responsibilities essentially consist of supporting the business unit or project manager with HSEQ issues such as:

- Introduction and implementation of the HSEQ Manual
- Identification of hazards and risks
- Proposal and following-through of measures for danger-/risk minimization
- Carrying out training of staff
- Monitoring compliance with HSEQ requirements included in the HSEQ Manual
- Weekly safety meetings
- Implementation of the HSEQ inspection and reporting system

Managers shall stress the importance HSEQ through the following measures:

- Meetings start with HSEQ
- Presenting and discussing incidents and the lessons learned
- Recording HSEQ issues in goals and reviews

Changes in the organization and processes are to be communicated through the management and the required training and measures are to be introduced if necessary. Relevant HSEQ information, updates, innovations, best practice examples, etc. shall be carried out by the organization via suitable communication means (e.g. intranet, shared files).

5 Strategic Planning for HSEQ

Centennial has established specific outcome goals and performance objectives that will focus activities on key areas to accomplish Centennial's HSEQ mission and strategic objectives. Centennial will use a combination of enforcement, outreach, voluntary assistance and innovative partnering with employees and business partners to meet these objectives.

5.1 HSEQ Strategic Objectives

- Employee and business partner acceptance of Health, Safety, Environment and Quality as core organizational values in support of HSEQ performance outcomes
- Integrate HSEQ systems and processes to continue to drive operational excellence in the management of health and safety risks, environment impacts or quality defects
- Monitor the effectiveness of standard system controls and the accuracy of HSEQ data in response to incidents and detect root causes to prevent reoccurrence
- Continue to systematically identify and manage Centennial's most significant risks to people, property, impact on the environment and quality deficiencies.

- Continue to reduce occupational injury or illness through targeted injury prevention programs
- Train, support and motivate to identify and manage workplace safety risks, environmental impact or quality defects
- Enable Centennial personnel to better manage the HSEQ performance of service providers consistent with Centennial policies and practices
- Establish metrics to document improvement in HSEQ results

5.2 HSEQ Strategic Meetings and Forums

5.2.1 Annual Strategic Focus

The Centennial Annual Strategic Focus is where Centennial executive leadership (including our President/CEO and all Regional Operations Managers) gather to discuss our annual objectives and goals both operationally and in regards to our HSEQ management system. This Annual Strategic Focus is where the previous year's goals are reviewed and discussed along with creating new safety benchmarks for the following year.

5.2.2 HSEQ Monthly Meeting

The HSEQ Monthly Meeting is where policy and procedure is discussed and reviewed and is chaired by the HSEQ Director and includes the corporate safety team and project safety managers. These meetings are beneficial to our HSEQ program as they give the safety team members the opportunity to discuss trends, observations from the field, upcoming rule and regulation changes and the opportunity to jointly review and modify policies and procedures as well as incorporate industry "best practices" that will benefit the organization.

5.2.3 Executive Management Meeting

The Executive Management Meeting is where Centennial's HSEQ program is summarized and evaluated. This meeting involves an HSEQ Director briefing of the executive team members on incidents, near misses, regulatory changes and trends that may impact organizational HSEQ performance.

6 HSEQ Auditing and Management Review

Centennial has implemented periodic, ongoing and recurring processes to evaluate the HSEQ manual and individual sections for deficiencies and methods to improve the overall system and process. The intent of this review is to identify gaps or deficiencies in the system and establish objectives for improvement and risk reduction consistent with Centennial's HSEQ objectives.

6.1 HSEQ Gap Analysis

Gap Analysis is the process through which Centennial compares our actual HSEQ performance to our expected HSEQ performance to determine whether we are meeting expectations and benchmarks. Our HSEQ gap analysis seeks to answer the questions "where are we?" (current state) and "where do we want to be?" (target state).

6.1.1 HSEQ Gap Analysis Objectives

This review process, referred to as "gap analysis", is intended to:

- Review relevant information to identify HSEQ issues related to occupational health and safety, environmental and quality performance
- Prioritize the HSEQ issues identified during the review
- Develop objectives for the system and for risk control, based on the prioritized HSEQ issues
- Formulate implementation plans to accomplish the prioritized objectives

6.1.2 HSEQ Gap Analysis Review

During this gap analysis review process, Centennial will review a wide range of information and systems to identify system and operational deficiencies that are significant to the organization. The review will include information regarding:

- Relevant safety and health systems and operational processes and procedures
- Written programs and management systems
- HSEQ key performance indicators
- Leadership and management processes and controls
- Previously identified HSEQ issues
- Allocation of resources for safety and health
- Applicable regulations, standards, and other health and safety requirements and updates
- Risk assessments and hazard evaluations
- Process and mechanisms for employee participation and involvement
- Results of safety and health inspections and audits
- Safety and health hazard reporting procedures

6.1.3 HSEQ Gap Analysis Evaluation

After the gap analysis is completed and the results have been established they will be evaluated and prioritized based on impact to the overall business model and nature of risk. Items will be categorized as:

- Issues requiring immediate attention
- Opportunities with the greatest potential for improvement or risk reduction
- Organization, resource, participation or accountability issues or other conditions that are fundamental to improvement in other areas
- Issues with the highest impact or severity

7 Amendment history

Date	Version	Revised content
11.18.2013	1.0	Initial Preparation
01.01.2018	2.0	Updates to Paragraph 2 Superior Documents (add the Group Policy and Global Standards), Paragraph 4 Centennial HSEQ Vision Statement (HSEQ policy appendix), Paragraph 5.2.3 Executive Management Meeting (definition) and Appendix 1 (logo and signatures)

8 Appendix

Appendix 1: HSEQ Policy at Centennial (0206500_CP_11_02_en_A1.1)

Health, Safety, Environment and Quality Policy at Centennial

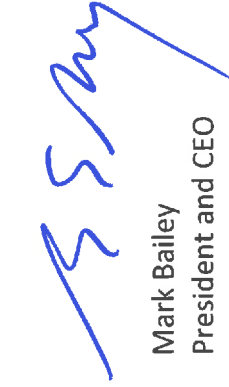
At Centennial we hold ourselves to a higher standard. Complying with legal and regulatory requirements as they pertain to health, safety, the environment and quality is only a starting point. We feel that open communication and continuous improvement are the only way to embed these ideals into the consciousness of all of our employees. We actively support each office in its pursuit of the higher standard through rigorous education and monitor their performance continually. The CEO will designate a senior manager within the company to manage the HSEQ program and to report back to Executive Management continuously on policy and results.

H Health We create working conditions which maintain and protect the health of our employees. We provide and create opportunities for passive and active preventative health care and for wellness.

S Safety Safety is the single most important thing we do. Safety is more important than profit, quality, schedule or customer satisfaction. If we cannot perform work safely, we will not do it. Safe is the only way we do business. It takes the personal commitment of each and every individual in the organization to meet our objective of Zero Accidents.

E Environment We ensure that the impact on the environment as a result of our business activities is negligible or reduced as much as possible. Acting in a sustainable and environmentally aware manner in all our activities and decisions serves as the foundation for this approach and contributes to the achievement of constant improvements in environmental protection.

Q Quality We are committed to the success of the services ordered. We provide our clients with products and services in a timely manner which meet or exceed the contractually agreed levels of quality and legal requirements as well as the value benchmarks of our society. We collaboratively develop optimized solutions with our clients.



Mark Bailey
President and CEO



Geoff Preisman
CIO



Brent LeVander
Operations Director
HSEQ Executive