

HSEQ Risk Assessment and Operations

Short description

This section details the means for assessing HSEQ risk and conducting business operations in accordance with the Centennial HSEQ management system. Business operations include the selection and management of subcontractors, lower tier subcontractors and Centennial employee's responsibilities regarding HSEQ performance.

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

Geoff Preisman

Name

President and CEO

Title

Content

1	Objective and area of application.....	3
2	Superior and additional applicable documents.....	3
3	Definitions.....	4
4	Risk Management.....	5
	4.1 Risk assessment.....	5
	4.2 Managing HSEQ risk.....	7
	4.3 Lifesaving rules.....	9
	4.4 Minimum requirements for the jobsite binder.....	10
	4.5 Minimum requirements for the jobsite box or container.....	10
	4.6 Archive process for the jobsite binder.....	11
5	Management of subcontractors.....	11
	5.1 HSEQ prequalification of subcontractors.....	12
	5.2 New subcontractor HSEQ orientation.....	13
	5.3 Subcontractor competent and qualified person(s).....	13
	5.3.1 Competent person(s).....	13
	5.3.2 Qualified person(s).....	14
	5.3.3 Authorized person(s).....	14
	5.4 HSEQ consequence management.....	15
	5.4.1 HSEQ consequence management classes.....	15
	5.5 Subcontractor substance abuse.....	17
	5.5.1 Refusal to test.....	17
	5.5.2 Reinstatement.....	17
	5.6 Safeguarding personnel working alone	18
6	Centennial employee HSEQ responsibilities.....	19
	6.1 Executive management.....	19
	6.2 Business unit managers.....	19
	6.3 Employees.....	20
	6.4 Concerning Children in the Workplace.....	20
7	Contract or project specific Accident Prevention Plan (APP).....	20
8	Amendment history.....	20
9	Appendix.....	22

1 Objective and area of application

The objective of this section is to outline the framework Centennial uses to formally anticipate, identify, measure, and assess the HSEQ risks involved in all aspects of business activities. This section includes the process for defining and assessing HSEQ risks and the criteria for selecting and managing subcontractors and lower tier subcontractors on Centennial project sites. This will be achieved through the implementation of risk control and mitigation procedures aimed to reduce risk to “as low as reasonably practicable” (ALARP).

The HSEQ Manual shall be implemented during the planning and bidding phase. Within the bidding and planning phase, an evaluation of relevant HSEQ contract requests shall take place before accepting any project or task order. Alongside the availability of resources and technical and organizational requirements, the legal requirements and HSEQ requirements and risks are to be determined and assessed in a feasibility analysis. The subcontractors’ activities must also be taken into consideration. If, based on the feasibility analysis, an economical and safe implementation is not possible, the contract or project must be rejected. The feasibility analysis and its outcome shall be documented and communicated to those responsible.

All Centennial employees and subcontractors will consider HSEQ as the key element to ensure the constructability, operability, and maintainability of Centennial projects. In doing so, employees will identify hazards associated with elements of design that may generate risks during construction, maintenance and use of equipment or facilities.

This HSEQ section applies to all:

- Subcontractors
- Vendors and suppliers
- Centennial and joint venture employees

Centennial expects subcontractors to have an equivalent dedication to HSEQ as outlined in this section. Centennial requires subcontractors to adopt, implement and enforce rules and practices necessary for the health and safety of personnel, environmentally responsible performance, and the contract according to the contract scope of work and specifications.

2 Superior and additional applicable documents

1000_GP_11_01_en_7.0 Group Policy on Health, Safety, Environment and Quality (HSEQ)

This section of the HSEQ Manual applies to all Centennial employees and subcontractors who are performing work in Centennial facilities and project sites. There may be more stringent requirements than this section as defined by specific State, local or contract specific requirements. If there is a conflict between this section and other applicable regulations, the more 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
ALARP	As low as reasonably practicable
Consequence	An HSEQ consequence resulting from an active or neglected action
Business unit manager	Includes both Senior Site Representatives (SSR) and Project General Managers (PGM)
Executive management	Project Executives (PEX) and above
HSEQ	Health, Safety, Environment and Quality
Risk	Possibility of loss or injury measured by probability and severity
Probability	The likelihood of an event to cause an incident, near miss, or loss and identified as: Frequent, Likely, Occasional, Seldom or Unlikely.
Severity	The outcome/degree if an incident, near miss, or loss occurs and identified as: Catastrophic, Critical, Marginal, or Negligible
AHA	Activity Hazard Analysis
Residual risk	The portion of risk that remains after a risk assessment has been conducted and all remedial measures or safeguards have been applied
Active	Risk management HSEQ software platform
Competent person	An employer designated individual who can identify existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them
Qualified person	One who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his/her ability to solve or resolve problems relating to the subject matter, the work, or the project.
Authorized person	An authorized person is permitted by an employer to perform a specific task or to be in a specific location at a jobsite and has the appropriate training to perform the task and recognize hazards related to the task or surroundings.

Lifesaving rules	Seven ground rules with the objective to protect the life and health of personnel.
LOTO/ZVV	Lock-out, tag-out and zero voltage verification
LOTO/ZPV	Lock-out, tag-out and zero pressure verification
PSO	Project Safety Officer
Severity of non-compliance	Standard for the severity of a consequence

4 Risk management

Risk Management is defined as a continual process which includes risk assessment, risk decision making, and implementation of risk controls, which results in acceptance, mitigation, reduction, or avoidance of risk. Centennial utilizes this concept and trains employees to incorporate risk management into project planning and decision making on our project sites and all additional operations where unacceptable risk may be present. Incorporating the concept of risk management into the HSEQ management system addresses the need to mitigate risks and reduce cost by driving continuous process improvement to reach HSEQ and operational objectives.

There are three levels of risk management:

- Time Critical: Used when there is limited time, limited complexity, and/or low risk. Often used during the execution phase of an operation where an unplanned change occurs and must be managed
- Deliberate: Used in the majority of workplace applications where HSEQ pre-planning is routine
- Strategic: Used in high priority or high hazard evolutions, strategic risk management requires use of more thorough hazard identification and risk assessment tools

4.1 Risk assessment

Risk assessment is an essential component of the Centennial HSEQ management system. Not only is performing risk assessments often a regulatory requirement but performing risk assessments is also based on sound business practice.

Risk is determined by assessing its two components:

- The severity or outcome of a hazard-related event
- The probability that the event could occur

A risk assessment matrix can assist in demonstrating how probability and severity are combined to obtain a quantified level of risk. A risk matrix lists the occurrence probability (frequent, likely, occasional, seldom, unlikely) versus the severity of consequences (catastrophic, critical, marginal, negligible) and assigns an overall quantitative risk assessment code (RAC). Risk levels are listed as extremely high, high, moderate, and low. For example, if the occurrence

probability is frequent, and the severity of consequences is high, then the risk level is high. If the occurrence probability is unlikely and the severity of consequences is negligible, then the risk level is low.

The objective of a risk matrix is to provide a logical framework for hazard analysis and risk assessment. In the decision-making process, the implicit goal is to achieve acceptable risk levels. If the residual risk is still deemed to be unacceptable, then a review of alternate risk control measures will be performed to further reduce risk exposure.

1	75	150	225	300	375
2	25	50	75	100	125
3	10	20	30	40	50
4	5	10	15	20	25
5	1	2	3	4	5
	Less Often	1-5 Years	6 months-1 Year	14 days-6 months	0-14 days

An alternate risk matrix (below) may be used as requested by specific customer requests or contract requirements.

Severity	Probability				
	Frequent	Likely	Occasional	Seldom	Unlikely
Catastrophic	E	E	H	H	M
Critical	E	H	H	M	L
Marginal	H	M	M	L	L
Negligible	M	L	L	L	L

Risk assessment, and hazard identification are pro-active approaches to dealing with concerns and issues as they arise on project sites that have the potential to create unplanned, unexpected, or undesirable consequences. Increased awareness and knowledge of risk are essential to improving business operations and reducing incidents and are key components of exercising due diligence. Hazards can be identified, assessed, and mitigated by applying effective risk control procedures.

The risk assessment process is completed in the following sequence of steps:

- Step one: identify each definable feature of work
- Step two: identify the hazards and those at risk
- Step three: develop and implement hazard controls to achieve ALARP
- Step four: monitor progress and review

The AHA (Appendix 1) is a tool used to assist in completing risk assessments and project HSEQ pre-planning for each definable feature of work. Once the hazards are identified, the best solution or hazard control method can be developed to reduce the risk to an acceptable level. Used in conjunction with the other applicable plans, this tool provides the layout for integrating HSEQ into the work process. Centennial manages direct employee risk through the development and implementation of the Centennial Employee AHA (Appendix 2) for normal operations and the Centennial Employee Field operations AHA (Appendix 8) for jobsite hazards. Projects that have unique risks greater than what is assessed in the Centennial Employee AHA template will need capture this additional risk in the current Centennial Employee AHA or create an additional AHA for these unique projects.

Unique projects or projects that have increased risk requiring additional pre-planning include but are not limited to projects where Centennial employees or subcontracted employees may be exposed to:

- Potential falls
- Excavations/trenches
- Scaffolding
- Confined spaces
- Use of ladders
- Chemicals or hazardous substances
- Electrical hazards
- Pressure hazards

4.2 Managing HSEQ risk

Centennial has an established process for achieving acceptable risk reduction by following the hierarchy of controls. This hierarchy provides a systematic way to determine the most effective and feasible method to eliminate or reduce risk to ALARP. When controlling a hazard, the first consideration is to eliminate the hazard or substitute a less hazardous method or process. This is best accomplished in the concept and design phases of a project utilizing the AHA risk assessment process and site-specific safety planning.

Often, a combination of controls is required to reduce risk to acceptable levels. In cases where the higher order controls (elimination, substitution, and implementation of engineering controls) do not reduce risk to an acceptable level, lower order controls, (e.g. warnings, administrative controls, or personal protective equipment) are used to complement engineering controls to reduce risk.

Below is the preferred order of risk control measures:

- Elimination
- Substitution of less hazardous materials, processes, operations, or equipment
- Engineering controls
- Administrative controls
- Personal protective equipment

Feasible application of this hierarchy of controls shall consider:

- The nature and extent of the risks being controlled
- The degree of risk reduction required

- The requirements of applicable local, federal, and state statutes, standards, and regulations
- Recognized best practices in industry
- Internal organization HSEQ manual and sections

4.3 Life saving rules

BILFINGER LIFE SAVING RULES

Bilfinger Inc.



	<h2>Permit to Work</h2>	RULE: ALWAYS work with a valid permit to work if it is required.	DEFINITION: PTW forms an essential part of safe systems of work for many work activities. It is a document which allows work to commence including mitigation measures to control the risks. ALWAYS ensure the PTW is fully understood by the whole team. If in any doubt, STOP work and seek assurance/advice.
	<h2>Verify Isolations</h2>	RULE: ALWAYS ensure that hazardous energy sources have been isolated, locked, and tagged before work begins.	DEFINITION: Energy isolation separates people from hazards such as electricity, pressure and energized equipment.
	<h2>Line of Fire</h2>	RULE: ALWAYS position yourself in a safe zone in relation to moving and energized equipment	DEFINITION: Line of Fire is entering the path of moving objects, or the release of high-energy, or substances that affect human bodies, or you put yourself in harm's way.
	<h2>Working at Height</h2>	RULE: ALWAYS protect yourself against falls from height.	DEFINITION: Working in a place where a person could be injured by falling, above or below ground level.
	<h2>No Drugs & Alcohol</h2>	RULE: NEVER work under the influence of intoxicating substances	DEFINITION: The consumption of any intoxicating substances, which can severely affect a person's physical and mental state, social situation and decision making is strictly prohibited.

	<h3>Confined Space</h3>	<p>RULE: ALWAYS ensure authorization is given to enter a confined space.</p>	<p>DEFINITION: A confined space is a place which is substantially enclosed (though not always entirely), and where serious injury can occur from hazardous substances or conditions within the space or nearby.</p>
	<h3>Respect Barriers</h3>	<p>RULE: NEVER cross barriers without permission.</p>	<p>DEFINITION: A safety barrier identifies a dangerous area and must not be crossed.</p>
	<h3>Last Minute Risk Assessment LMRA</h3>	<p>RULE: ALWAYS perform a Last Minute Risk Assessment prior to any work activity.</p>	<p>DEFINITION: It is the last assessment, conducted by an individual at the work site, to capture any unforeseen hazards that have not already been identified.</p>

4.4 Minimum requirements for the jobsite binder

The jobsite binder is designed to maintain important HSEQ related documentation both for employee and subcontractor reference and use as well as to comply with regulatory requirements. Below are the minimum requirements for the jobsite binder:

- Project site visitor log
- Weekly safety meetings (toolbox talks)
- Centennial/JV AHA and AHA for all subcontractor definable features of work
- Weekly Site Inspection Checklist (may be managed within Procore)
- HSEQ Site Specific Plan
- Letters of Designation
- Permits (excavation, energized work, hot work, etc.)
- Safety Data Sheets (SDS) and log for all chemicals and hazardous materials or substances
- Incident report form
- Regulatory inspection form
- OSHA Appendix D form
- HSEQ training documentation
- Additional plans for high-risk features of work (fall protection, excavation, confined space, steel erection, crane operations etc.)

The Table of Contents for the HSEQ Jobsite binder can be found in Appendix 6.

The Jobsite Pre-Startup Checklist can be found in Appendix 10.

4.5 Minimum requirements for the jobsite box or container

Each project site will maintain the following minimum items in a jobsite box or container and will be readily available:

- Centennial provided fire extinguisher (Minimum 5lb ABC)
- A Class B first aid kit meeting ANSI/ISEA Z308.1 (either sealed and unused or properly inventoried)

- Extra PPE (hardhat, vest, safety glasses, hearing protection, hand protection, etc.)
- Bottle of eye wash
- Ground Fault Circuit Interrupter (GFCI)

4.6 Archive process for the jobsite binder

The contents of the jobsite binder shall be maintained electronically after project completion.

5 Management of subcontractors and suppliers

This section defines the framework for subcontractor management and overall HSEQ performance and applies to all subcontractors and lower tier contractors performing work within the operational control of Centennial. A subcontractor is defined as any company or individual that is under a subcontract and performs work or provides services to or for Centennial. HSEQ risk related to subcontractor work activity is significant as subcontractors are employed to perform the majority of the work on Centennial project sites.

Specific subcontractor HSEQ risk mitigation requirements are as follows:

- Subcontractors will be able to demonstrate individual competence in the scope of work, contract specifications and HSEQ matters while performing designated work
- Subcontractors will perform operations in accordance with applicable contract, federal, state, and municipal regulations and Centennial HSEQ manual sections
- Subcontractors will have an AHA developed and reviewed for each definable feature of work prior to performing the work
- Subcontractors shall attend a review of the HSEQ Site Specific Plan. Once completed, a sticker is issued and displayed on the hardhat. The color of the hard hat sticker is changed every two years.
- Subcontractors will have established documents in place for specific high hazard work, including, but not limited to:
 - Lockout/tagout/ZVV/energized electrical work procedure
 - Cranes and weight handling equipment
 - Excavation/trenching
 - Scaffolding and work platforms
 - Fall protection
 - Permit required confined space
 - Asbestos or lead abatement
- Subcontractors shall provide adequate employee health and safety training for all tasks where hazardous exposures may exist including emergency response training (CPR/FA, fire extinguishers etc.)
- Subcontractors shall have a project-specific pre-task plan(s) that has been reviewed and accepted by Centennial. Pre-task plans include, but are not limited to the following:
 - AHA
 - High risk work plans
- The subcontractor competent person shall sufficiently identify and document potential workplace hazards and take adequate protective measures, including the use of appropriate personal protective equipment (PPE)
- The subcontractor shall, at a minimum, provide, maintain, and be trained in the use of the following items and equipment:
 - Fire extinguisher appropriately sized for the task or work being performed (Minimum 5lb ABC)

- A Class B first aid kit meeting ANSI/ISEA Z308.1 (either sealed and unused or properly inventoried)
- Ground Fault Circuit Interrupter (GFCI)
- All other necessary PPE or safety equipment as required by their work or applicable health and safety regulations.
- Subcontractors must provide a minimum of two people certified in CPR and First Aid for each Centennial project site. In some scenarios, only one worker may be permissible (see 5.6 Safeguarding Personnel Working Alone - of this section).

Centennial may delegate specific HSEQ authority to subcontractors who are specialized and best capable of identifying, evaluating, and controlling HSEQ risks in certain situations. Centennial recognizes that some contractors possess specialized knowledge, skills, methods, and means of identifying and controlling industry or task specific hazards.

5.1 HSEQ prequalification of subcontractors

Centennial has incorporated HSEQ risk evaluation into the tool that is used to pre-qualify potential subcontractors. This tool is called the Subcontractor Qualification Form (Appendix 3). This worksheet is intended to evaluate a potential subcontractor's HSEQ performance by assessing both leading and lagging HSEQ indicators.

Centennial prequalification of potential subcontractor partners may include an evaluation of the following:

- Assessment of HSEQ leading and lagging indicators
 - Regulatory inspections (OSHA, State, EPA etc.) resulting in citations or penalties or findings of no citations
 - Total Recordable Incident Rate (TRIR)
 - Days Away, Restricted Duty or Transfer rate (DART)
 - Experience Modification Rate (EMR)
 - Accident/incident/near miss investigation process
 - Substance abuse program
 - Past performance of similar projects (scope and complexity)
 - HSEQ employee training
 - Written company safety program
 - Weekly safety meetings
 - HSEQ inspection process
 - Past warranty or quality deficiencies

Once a new subcontractor has been prequalified and accepted as a potential business partner, Centennial requires new subcontractors to:

- Attend a new subcontractor HSEQ orientation program
- Provide all applicable HSEQ training documentation for the project
- Provide competent/qualified HSEQ supervision
- Adhere to all Centennial specific HSEQ requirements
- Complete and adhere to all AHAs for each definable feature of work
- Complete periodic HSEQ inspections and audits to ensure continuing acceptable performance
- Attend a HSEQ Site Orientation for each project. The local office shall maintain documentation that these have been completed.

5.2 New subcontractor HSEQ orientation

The purpose of the Centennial new subcontractor HSEQ orientation is to provide awareness to subcontractor employees regarding HSEQ matters and specific health and safety hazards that may be present on our project sites prior to beginning work on any Centennial project. The subcontractor HSEQ orientation also establishes procedures to identify, report and abate HSEQ deficiencies on Centennial project sites. This orientation is administered by a Centennial Project Safety Officer or HSEQ Regional Manager and may be accomplished either in a local office or on the project site. The orientation may also be accomplished by the subcontractor with their staff.

Specific topics covered in the subcontractor HSEQ orientation include:

- Centennial site-specific safety rules (Appendix 4)
- Progressive disciplinary procedures
- Substance abuse policy
- Site specific/task specific safety plans
- Review of all applicable Activity Hazard Analyses (AHA)
- Competent person(s)
- Regulatory inspections
- Incident/near miss reporting
- Hazard reporting
- Personal protective equipment requirements
- Daily reporting requirements
- Emergency response procedures
- Applicable Safety Data Sheets (SDS)
- Project plans and specifications
- Project submittals

5.3 Subcontractor competent, qualified and authorized person(s)

5.3.1 Competent person(s)

Centennial requires each subcontractor to designate an “on site” competent person for the project site regarding HSEQ matters. An individual may become competent by way of training and/or experience, a competent person is knowledgeable and capable of identifying workplace hazards relating to the specific operation and has the authority to correct them.

Examples of tasks requiring a competent person include, but are not limited to:

- Scaffold erection/dismantling
- Fall protection
- Excavation/trenching/soil analysis
- Steel erection
- Confined space
- Traffic control flagger
- Demolition

5.3.2 Qualified person(s)

A qualified person requires a recognized degree, certificate, etc., or extensive experience and ability to solve the subject problems, at the worksite. There may be a requirement for more technical or engineering knowledge to be considered “qualified”.

Examples of tasks requiring a qualified person include, but are not limited to:

- LOTO and zero voltage verification
- Energized electrical work
- Design of fall protection systems
- Excavation slope configurations greater than 20 feet
- Design of scaffold systems greater than 125 feet in height
- Crane and derrick rigging/signaling
- Assembly/disassembly director for cranes or derricks
- Engineering survey for demolition operations

5.3.3 Authorized person(s)

An authorized person is permitted by an employer to perform a specific task or to be in a specific location at a jobsite and has the appropriate training to perform the task and recognize hazards related to the task or surroundings.

Examples of tasks requiring an authorized person include, but are not limited to:

- Operation of power tools
- Fall protection
- Operation of machinery / equipment
- Working within a Controlled Access Zone
- Electrical work (as permitted by the most current version of NFPA70E)

Each subcontractor shall designate their Competent, Qualified and/or Authorized personnel using a Letter of Designation. Appendix 9 provides an example of this document.

5.4 HSEQ consequence management

Centennial believes that our HSEQ management system is unenforceable without a clearly outlined progressive consequence management procedure. The Centennial consequence management procedure provides employees and subcontractor workers with an opportunity to correct behaviors or conditions before an incident or health and safety violation, deviation or potential incident occurs. The following consequence management procedure will be applied to all HSEQ violations and deviations and is summarized in the Centennial Site Safety Rules. The purpose of the HSEQ progressive disciplinary policy is to control the work environment so that all personnel on the project site are protected and incidents or regulatory citations and penalties are avoided. Written warnings will be documented on the Subcontractor HSEQ Non-Conformance Form (Appendix 5).

5.4.1 HSEQ consequence management severity

HSEQ violations are divided into three classes of severity:

- Severe deviations, i.e. violations which could result in criminal prosecution, which led to severe or fatal injuries, which caused a person’s life to be placed in immediate danger, which led to the loss of a contract or severe environmental/property damage or quality defects, working under the influence of alcohol or drugs, violations against the Life Saving Rules or intentionally giving unlawful instructions
- Major deviations, i.e. violations against the Life Saving Rules, which could lead to the loss of a contract, not using personal protective equipment to guard against life-threatening hazards, repeatedly disregarding the use of personal protective equipment, or working without a contract or approval
- Minor deviations, i.e. violations disregarding the use of personal protective equipment, not reporting recognized hazards, or giving unlawful instructions carelessly

A member of the HSEQ team or Operations shall create a documented report following each incident or suspected violation using the HSEQ Non-Conformance Form. This report will make note of any HSEQ violations and its classification, and must be sent to the HSEQ Director, HR Manager and Executive Management. In the case of a subcontractor violation notice shall extend to the ownership of the subcontractor firm. The consequences for violating HSEQ regulations or procedures shall correlate to the actual or potential impact of consequences as well as to the extent of repeated offenses.

	Description	Own Employee	Contract Employee
Category 1 (Severe deviations)	<ul style="list-style-type: none"> ▪ Repeated violations of the Life Saving Rules (see paragraph 4.3 of this section) ▪ Violations which could result in criminal charges (criminal offenses) ▪ Deviations which have resulted in severe or fatal injuries ▪ Deviations which could lead to a person’s life to be placed in immediate danger ▪ Violations which resulted in loss of contract ▪ Deviations which could lead to severe environment/property damage or quality incidents ▪ Working under the influence of alcohol or drugs ▪ Intentionally giving unlawful instructions 	Includes the most severe consequences e.g. termination or suspension.	<ul style="list-style-type: none"> ▪ Immediate suspension from all Centennial projects. ▪ Suspension for 1-3 years from Centennial projects.
Category 2 (Major deviations)	<ul style="list-style-type: none"> ▪ Violations against the Life Saving Rules (see paragraph 4.3 of this section) ▪ Violations which can result in loss of contract. 	Includes a range of consequences from written warnings and suspension to termination	<ul style="list-style-type: none"> ▪ Issue a written letter warning of potential suspension from

	<ul style="list-style-type: none"> ▪ Not using appropriate protective equipment to guard against life-threatening hazards ▪ Repeatedly disregarding the use of PPE ▪ Working without contract or appropriate authorization ▪ Working without high risk HSEQ plans (crane lift, critical lift, PRCS, excavation, steel erection, fall protection, energized work etc.) ▪ Deliberately giving unlawful instructions 	<p>depending on the severity of violations.</p>	<p>all Centennial projects.</p> <ul style="list-style-type: none"> ▪ 6-month suspension from all Centennial projects.
<p>Category 3 (Minor deviations)</p>	<ul style="list-style-type: none"> ▪ Disregarding the use of PPE ▪ Not reporting or abating hazards. ▪ Working without an AHA. ▪ Failing to conduct routine documented HSEQ inspections. ▪ Giving unlawful instruction carelessly 	<p>Includes milder forms of consequences ranging from verbal warnings up to written warnings and formal documented counseling.</p>	<ul style="list-style-type: none"> ▪ Verbal warnings ▪ Written warnings and/or project removal for 1-3 days. ▪ Maximum of 6-month suspension from all Centennial projects for repeat violations.

5.5 Subcontractor substance abuse

The Subcontractor Agreement requires all subcontractors to have any subcontractor employee involved in an actionable incident to submit to a post incident substance abuse test at a qualified medical lab. The involved subcontractor employee(s) must take the drug and/or alcohol (BAC) test within 24 hours of the incident. If the subcontractor does not have an active program, Centennial shall schedule the individual(s) to take the test at an approved testing facility within the time frame required. If it is suspected that a subcontractor employee is under the influence, they will not be permitted to drive themselves to a qualified medical lab. Arrangements shall be made to ensure that they are transported to the qualified medical lab. See HSEQ Manual Section 8, Appendix 3 for specific guidance on post incident substance abuse testing requirements.

If any Centennial employee or Subcontractor personnel observes and articulates reasonable suspicion that a Subcontractor employee is under the influence of drugs or alcohol, the Subcontractor shall conduct a drug and BAC test of the employee at a reliable testing site. If this situation occurs, Centennial’s employee shall immediately inform Centennial’s SSR and PSM. Centennial may assist the Subcontractor in identifying a nearby facility and with scheduling or paying for the necessary screening. In each case, the Subcontractor employee must be driven to the testing facility and accompanied throughout the test.

An immediate positive BAC result (any presence of alcohol measured by the test) will result in the removal of the Subcontractor employee from the work site for a minimum of two weeks. If the BAC test is negative or inconclusive, the Subcontractor employee will not be permitted back onto the work site until the earlier of a negative drug screen result or the Subcontractor explains with particularity the basis for its employee's behavior, conduct, and actions that gave rise to the reasonable suspicions. If the drug screen results are positive, the Subcontractor shall remove its the employee from the work site for a minimum of two weeks.

5.5.1 Refusal to test

If the subcontractor employee refuses to undergo the post-incident substance abuse test then the employee shall be immediately suspended from all Centennial operations until a reasonable determination can be made to the employee's disposition. If no reasonable explanation for the refusal is determined, then the employee is prohibited from working on a Centennial project site.

5.5.2 Reinstatement

Criteria for re-instatement of the subcontractor employee include the successful completion of a drug rehabilitation program and multiple random drug tests over a period of one year. At the completion of the rehabilitation program, the subcontractor employer may request re-instatement for their employee under described conditions. The SSR will consult with the regional HSEQ team member and HSEQ Director and together they will decide based on all available information. Failure of the second test by that subcontractor employee at any time will result in their permanent suspension from all Centennial and Joint Venture operations.

5.6 Safeguarding personnel working alone

Employees and/or subcontractors who work alone are potentially placing themselves in a hazardous situation. Working alone is recognized as a risk and potential hazard. The severity of the consequences and the probability of an unwanted/unplanned event occurring are based on numerous factors. However, even in the safest locations, a lone worker can experience a medical emergency or a hazardous unplanned event which would require emergency assistance. Therefore, in most circumstances Centennial prohibits employees and/or subcontractors from working alone. However, Centennial acknowledges that there are occasional situations which require individuals to work alone.

Working alone is not permitted when one or more of the following criteria are present:

- There is no readily accessible means of communication to summon emergency assistance
- Work that is remote or isolated from the assistance of others due to the location, nature, or time such as, but not limited to:
 - Confined space
 - Work at heights
 - Work in excavations
 - Operating heavy machinery/equipment and at night or in poorly lit locations,
 - Tasks which require the use of respiratory protection
 - Hot work (welding, cutting, brazing, or soldering)
 - Work where an individual could be exposed to electrical shock, arc flash/blast or electrocution
 - Logging/tree work operations

- Diving operations
- Material handling (cranes, forklifts etc.)
- Steel erection
- Operation or maintenance of hazardous equipment
- Handling of hazardous substances or use of large volumes of flammable solvents/liquids
- Work which is too hazardous for a single employee to perform alone

Under the following circumstances, working alone may be permissible (with Centennial authorization):

- A Centennial Project Manager, PSO, Superintendent and/or PSM is notified of the planned work, when it will commence and the expected completion time
- Employees who are working in an office setting or other low risk environment
- An easily accessible means of communication to gain assistance in an emergency is available
- Employees must implement a “Check-in” system and call/notify/check-in with a member of the Centennial management team (listed above) periodically throughout the workday

If an effective means of communication is not available and the Check-In system is not feasible, the employee/subcontractor is prohibited from working alone and completing their task(s). Additionally, the employee/subcontractor who has been granted permission to work alone must be recognized by his/her employer as a “Competent Person”, must be trained in first aid, and must revise the task specific activity hazard analysis (AHA) to reflect the potential newly created hazards of working alone. The AHA revisions shall be reviewed and accepted and include at a minimum:

- Means of communication
- Time frames of notification when using the “Check-In” system
- What means of signaling emergency services will be implemented
- What special equipment will be needed by the lone worker

6 Centennial employee HSEQ responsibilities

6.1 Executive management

Centennial executive management is responsible to provide senior management support to the HSEQ team and business unit managers. Specific responsibilities include:

- Providing visible support and leadership for the implementation of the HSEQ management system consistent with Centennial business objectives and goals
- Defining clear HSEQ values and standards along with annual objectives
- Exercising strong leadership in the direction of the HSEQ management system
- Delegating responsibility, accountability, and support for HSEQ management throughout all levels of the organization
- Holding managers and employees accountable for the HSEQ responsibilities in their charge
- Strategically plan for the continuous improvement of the HSEQ management system

6.2 Business unit managers

Business unit managers are responsible to provide HSEQ leadership to all levels of employees within their business unit and to ensure that all HSEQ plans, programs, policies, and procedures are implemented in a manner that will ensure HSEQ compliance. Specific responsibilities include:

- Communicate and implement the HSEQ management system and its requirements to employees, visitors, and contractors
- Direct individuals under their supervision, including but not limited to supervisors, managers, contractors, and other affected personnel in the requirements of the Centennial HSEQ manual and individual sections
- Ensure all HSEQ objectives and goals are met for the business unit
- Incorporate HSEQ requirements and responsibilities into employee job descriptions and ensure that safety and health expectations are communicated to each employee
- Include HSEQ performance when evaluating and selecting suppliers and contractors
- Maintain and improve programs for HSEQ within the area of their control
- Ensure all client/customer HSEQ requirements are fulfilled

6.3 Employees

Employees are responsible for maintaining safe working conditions in their work area and/or project sites.

- Implement the HSEQ practices and programs under their supervision and control
- Require all employees and subcontractors under their direction to receive all required HSEQ training and instruction
- Collect and implement appropriate plans and documents required by the HSEQ management system
- Ensure that AHAs are submitted and are adequate for each definable feature of work
- Conduct HSEQ incident/near miss investigations
- Ensure that all required inspections and testing is completed
- Report all HSEQ incidents immediately
- Comply with all Centennial HSEQ manual and sections
- Review and sign the Centennial Site Safety Rules (Appendices 4 and 7) every two years. A new hardhat sticker will be issued upon completion of the document
- Ensure every jobsite is secure at the close of business

6.4 Concerning Children in the Workplace

- Centennial prohibits any person under 18 years old from being on a Centennial project/site. If a minor seeks to come to a project/site, the employee must contact his or her supervisor to obtain prior authorization to allow the minor to be present. Associated risks such as existing and potential hazards during the visit, amount of time the minor will be on site, and justification for such a visit shall be taken into consideration for approval. A minor, approved for project/site visits will be the responsibility of the employee requestor and must be accompanied by and under direct supervision of the requestor at all times.

7 Contract or project specific Accident Prevention Plan (APP)

Centennial may be asked by a client or customer to develop and submit a contract or project specific Accident Prevention Plan (APP). Although client or customer specific content expectations may vary, the most current version of EM 385-1-1 Appendix A - Minimum Basic Outline for Accident Prevention Plans shall be used to develop this plan. Centennial HSEQ staff are authorized to develop and approve an APP.

8 Amendment history

Date	Version	Revised content
01.02.2014	1.0	Initial Preparation
01.01.2015	1.1	Update to project site binder archive process and life-saving rules
01.04.2016	1.2	Amended and updated paragraph 5.4 HSEQ consequence management in accordance with Bilfinger procedures
03.01.2016	1.3	Updated appendix 6 as the Centennial HSEQ "Grab and Go" Binder
07.01.2016	1.4	Addition of paragraph 4.5- Minimum requirements for the jobsite box or container and 5.6 Safeguarding employees working alone
02.15.2017	1.5	Clarification of blood alcohol testing in post incident or reasonable suspicion substance abuse testing in paragraph 5.5
05.23.2017	1.6	Clarification of Consequence Management Classes paragraph 5.4.1
10.20.2017	1.7	Update to Jobsite Box to include GFCI in paragraph 4.5
01.01.2018	2.0	Updates to Paragraph 2 Superior Documents (add the Group Policy and Global Standards) Paragraph 3 Definitions (Centennial), Paragraph 4.2 Managing HSEQ risk (Appendix 6 removal), Paragraph 4.4 Minimum requirements for the jobsite binder (Appendix 6 Table of Contents), Paragraph 4.5 Minimum requirements for the jobsite box or container (details), Paragraph 5 Management of subcontractors and suppliers (pre-task plans), Paragraph 5.4.1 HSEQ consequence management severity (notice), Paragraph 5.5 Subcontractor substance abuse (reasonable suspicion), Paragraph 7 Contract or project specific Accident Prevention Plan (approval), Appendices 4 and 7 (approval and logo) and Appendices 1-3, 5 and 6 (logo)
11.01.2018	2.1	Updates to Paragraph 5.5 Subcontractor substance abuse (reasonable suspicion), Appendix 6.2 Grab and Go Binder Table of Contents and the addition of Appendix 8 Centennial Employee Field Operations AHA
04.01.2019	2.2	Update to Appendix 4 Centennial Site Safety Rules
07.01.2019	2.3	Update to Paragraph 3 Definitions, Paragraph 4.4 Minimum Requirements for the Jobsite Binder, Paragraph 5 Management of Subcontractors and Suppliers, Paragraph 5.1 HSEQ Prequalification of Subcontractors, Paragraph 5.2 New Subcontractor HSEQ Orientation, Paragraph 5.3 Subcontractor Competent, Qualified and Authorized Person(s), Paragraph 6.3 Employees and the addition of Appendix 9 Letter of Designation

10.01.2019	2.4	Update to Appendix 6.3 Grab and Go Binder Table of Contents
04.01.2021	2.5	Updates to Paragraph 2 Superior Documents, Paragraph 5 Management of Subcontractors and Suppliers (Jobsite requirements), Appendix 1 Subcontractor Activity Hazard Analysis, Appendix 2 Centennial Employee Activity Hazard Analysis, Appendix 3 Subcontractor Qualification Form, Appendix 4 Centennial Site Safety Rules and Appendix 8 Centennial Employee Field Operations Activity Hazard Analysis
06.01.2021	2.6	Update to Appendix 7 Centennial Site Safety Rules Spanish Version
11.01.2021	2.7	Update to Paragraph 5.1 HSEQ Prequalification of Subcontractors (remove the requirement for a written safety program and added the requirement for the local office to maintain documentation of the new Subcontractor Orientation), Paragraph 6.3 Employees (added the requirement to secure the jobsite at the close of business) and Appendices 1,2 and 8 to allow users to fill in information.
04.01.2022	2.8	Update to Paragraph 2 Superior Documents (Group Policy version) and Paragraph 4.3 Lifesaving Rules (new version)
8.11.2023	2.9	Update to Paragraph 4.4 Jobsite Pre-Startup Checklist location statement
7.26.2024	2.10	Added Section 6.4 Concerning Children in the Workplace

9 Appendix

Appendix 1: Activity Hazard Analysis (0206500_CP_11_06_en_A1.3)

Appendix 2: Centennial Employee AHA (0206500_CP_11_06_en_A2.4)

Appendix 3: Subcontractor Qualification Form (0206500_CP_11_06_en_A3.2)

Appendix 4: Centennial Site Safety Rules (0206500_CP_11_06_en_A4.4)

Appendix 5: HSEQ Non-Conformance Form (0206500_CP_11_06_en_A5.4)

Appendix 6: Centennial HSEQ Jobsite Binder Table of Contents (0206500_CP_11_06_en_A6.3)

Appendix 7: Centennial Site Safety Rules Spanish Version (0206500_CP_11_06_en_A7.1)

Appendix 8: Centennial Employee Field Operations AHA (0206500_CP_11_06_en_A8.2)

Appendix 9: Letter of Designation (0206500_CP_11_06_en_A9)

Appendix 10: Jobsite Pre-Startup Checklist (0206500_CP_11_06_en_A10)

Activity Hazard Analysis (AHA)

Company Name:						
Activity/Work Task:	Overall Risk Assessment Code (RAC) (Use highest code)					
Project Location:	Risk Assessment Code (RAC) Matrix					
Contract Number:	Severity	Probability				
Date Prepared:		Frequent	Likely	Occasional	Seldom	Unlikely
Prepared by (Name/Title):	Catastrophic	E	E	H	H	M
	Critical	E	H	H	M	L
Reviewed by (Name/Title):	Marginal	H	M	M	L	L
	Negligible	M	L	L	L	L
Notes: (Field Notes, Review Comments, etc.)	Step 1: Review each "Hazard" with identified safety "Controls" and determine RAC (See above)					
	"Probability" is the likelihood to cause an incident, near miss, or accident and identified as: Frequent, Likely, Occasional, Seldom or Unlikely.				RAC Chart	
	"Severity" is the outcome/degree if an incident, near miss, or accident did occur and identified as: Catastrophic, Critical, Marginal, or Negligible				E = Extremely High Risk	
	Step 2: Identify the RAC (Probability/Severity) as E, H, M, or L for each "Hazard" on AHA. Annotate the overall highest RAC at the top of AHA.				H = High Risk	
				M = Moderate Risk	L = Low Risk	
Job Steps	Hazards	Controls			RAC	

Job Steps	Hazards	Controls	RAC

Centennial Employee Activity Hazard Analysis (AHA)

Activity/Work Task: Office Work/Traveling To & From Project Sites	Overall Risk Assessment Code (RAC) (Use highest code)					
Project Location:	Risk Assessment Code (RAC) Matrix					
Contract Number:	Severity	Probability				
Date Prepared:		Frequent	Likely	Occasional	Seldom	Unlikely
Prepared by (Name/Title):	Catastrophic	E	E	H	H	M
	Critical	E	H	H	M	L
Reviewed by (Name/Title):	Marginal	H	M	M	L	L
	Negligible	M	L	L	L	L
<p>Notes: (Field Notes, Review Comments, etc.) PPE for all activities on site shall include at a minimum: ANSI Z89.1 Hardhat, ANSI Z87.1 safety glasses, leather work shoes or boots, short sleeve (min 4" sleeve) shirt, long pants and gloves meeting ANSI Cut Level A2 and Abrasion Level A2. High visibility vest (minimum class II). Class B First Aid Kit provided on-site. This AHA is required to be reviewed prior to the start of work and updated as necessary to reflect the scope of work and work procedures taking place. Report any unsafe acts or conditions to supervisor.</p>	Step 1: Review each "Hazard" with identified safety "Controls" and determine RAC (See above)					
	"Probability" is the likelihood to cause an incident, near miss, or accident and identified as: Frequent, Likely, Occasional, Seldom or Unlikely.				RAC Chart	
	"Severity" is the outcome/degree if an incident, near miss, or accident did occur and identified as: Catastrophic, Critical, Marginal, or Negligible				E = Extremely High Risk	
	Step 2: Identify the RAC (Probability/Severity) as E, H, M, or L for each "Hazard" on AHA. Annotate the overall highest RAC at the top of AHA.				H = High Risk	
					M = Moderate Risk	
				L = Low Risk		
Job Steps	Hazards	Controls			RAC	
1) Office layout and Setup	1) Slips, Trips, Fall, Injury, Illness. Blocking emergency exit doors	1) Emergency exits and passageways must be kept clear and free of any obstructions at all times; Furniture and equipment should be arranged so Chairs and equipment are not stored in walkways; File and desk drawers are not left open in the walkways, and No obstructions are created that blocks the view around corners or partitions. Marked EXIT doors shall be kept clear and maintained at all times. Department of Labor poster and OSHA job protection to be posted. First aid kit, Automated External Defibrillator (AED) and fire extinguisher shall be provided and maintained at conspicuous and unobstructed locations.			L	
2) Using walking/working surfaces around office areas	2) Slips, Trips, Falls	2) Ensure that aisles and passageways are correctly established and clear, no tripping hazards are evident, floors are even, wires are not stretched across aisles or passageways, entrance mats are available and used for wet weather, floors are dry - not slippery, and carpets/rugs are secure. Eliminate clutter which creates a tripping hazard.			L	

3) Using stairways, halls, ramps and storage spaces around office areas	3) Slips, Trips, Falls	3) Ensure there is adequate lighting – suitable for the task. Ramps have a nonslip surface. Stairways are clear-not cluttered. Stair treads are in good condition and uniformly spaced. Handrails are maintained. Hallways are kept clear of equipment and supplies.	L
4) Using bookcases, shelves and cabinets/opening and closing file drawers	4) Injuries from materials tipping and Falling.	4) Ensure that shelves are not overloaded, heavy storage shelves are secured to the wall, heavy storage files are secured from tipping with only one drawer open at a time. Secure cabinet and bookcases to the wall if feasible. Never overload shelves and stack boxes evenly to avoid tipping.	L
5) Using office equipment	5) Cuts, sprains, strains and injuries caused by personnel tripping and falling.	5) Use adequate hand protection when manipulating or using sharp objects. Ensure file drawers are closed when not in use and are not overstuffed. Ensure chairs are in good mechanical condition, fans are guarded and secure from falling paper cutters are equipped with a guard, safe use of paper shredders (keep loose hanging items such as badges, loose clothing, long hair, and ties clear), step stools are used when needed and kept clear of aiseways when not in use. Ensure the proper storage of paper, supplies & other.	L
6) Using electrical equipment	6) Electrical shock, Fires, Equipment damage	6) Ensure machines and equipment are double insulated grounded extension cords - 14/3 or greater and UL listed. Ensure the plugs and wall outlets are in good condition and circuits are not overloaded. Have no wires running under carpets. Have the safety department's approval for coffee pots and electric heaters.	L
7) Computer work/station	7) Back Strain, Eye Strain, Repetitive Motion Injury	7) Change work activity often to interrupt repetitions activity or motion. Avoid excessive unnatural or awkward motions such as twisting the arm or wrist and overexertion. Make a conscious effort to avoid incorrect posture. Keyboard location and height are two primary considerations. First, adjust desk and/or chair height to a height where your wrists do not bend and use adjustable keyboard trays that move and tilt. Next, position yourself correctly to the keyboard, not too far or too close, but at a comfortable distance. Mouse placement should be as close as possible to the side of the keyboard to allow you to use it easily and	L

<p>8) Lifting/handling/moving heavy items and equipment/ replacing water bottles.</p>	<p>8) Strains and sprains to the back, arm and shoulders, Hand protection/ injuries, lacerations.</p>	<p>comfortably without too much arm, hand, wrist, or elbow extension. Computer monitor placement should not be too close, too far, too high, or too low. A good distance is about an arm's length away and your eyes should look straight ahead into it. There should be no natural or artificial light reflecting off the screen. Change chair adjustments periodically throughout the day to suit your back. You need a chair that fits you: Correct chair height; the seat; the back support; the Armrests.</p> <p>8) Use mechanical means to lift and move heavy items, use push carts and dolly. Always employ proper lifting techniques and get help with loads that cannot be safely lifted by one person. Wear hand and foot protection to safeguard against crushing and pinching injuries. Hand protection must meet ANSI Cut Level A2 and Abrasion Level A2 shall be always worn or used by all Centennial employees and subcontractors in the field unless expressly excluded in the Activity Hazard Analysis. Hand protection selection and wear shall be based on the manufacturer's criteria for wear and use, proper fit and comfort and the specific hazard potential.</p>	<p>L</p>
<p>9) Reaching items that is elevated</p>	<p>9) Fall hazard</p>	<p>9) Never use inappropriate methods to reach items up high. Do not stand on chairs, use proper foot stool or ladder.</p>	<p>L</p>
<p>10) Falls, inspections at heights.</p>	<p>10) Injuries caused by personnel tripping and falling.</p>	<p>10) All Centennial workers are to be protected from falls. Trigger height is 4'. Keep walkways and paths clear of trip hazards. Always be aware of your surroundings, never expose yourself to a fall hazard. Never use inappropriate methods to reach items up high.</p>	<p>L</p>
<p>11) Using paper cutter (preparing, cutting paper, moving paper cutter)</p>	<p>11) Laceration to fingers or hand; possible amputation of fingers.</p>	<p>11) Avoid contact with blade. Make sure handle is locked down before moving paper cutter. Pick up paper cutter by non-blade edges. Hold paper cutter with blade away from body.</p>	<p>L</p>
<p>12) Operating paper shredder</p>	<p>12) Laceration to fingers and scalp injury hair, jewelry, loose clothing caught in feeder.</p>	<p>12) Never put fingers or objects other than paper (like paper clips or staples) into the shredder feed opening. Keep jewelry, long hair, ties, lanyards, etc. away from the paper shredder feed opening. Feed paper smoothly into the shredder, not forcing the paper in.</p>	<p>L</p>

<p>13) Using small power tools and extension cords</p>	<p>13) Electric shock</p>	<p>13) Ensure machines and equipment are grounded, extension cords are the 3-wire types, 14/3 or better, UL listed, ensure the plugs & wall outlets are in good condition and circuits are not overloaded. Have no wires running under cabinets and desks. Never use extension cords in place of permanent wiring. If a cord must be used make sure it is properly sized for the voltage and amperage of the equipment. Avoid unnecessary use of adapters and multi-outlet strips. Do not run power cords through door openings, window openings, or under chairs where it may be walked on or pinched. For set-up and operation strictly follow manufacturer's instructions. Unplug and or lockout/tagout any equipment before performing maintenance or repair. Unplug defective electronic equipment and have it repaired or replaced as soon as possible. In addition, tag the defective device with a "Do Not Use" Warning sign until it can be repaired or replaced.</p>	<p>L</p>
<p>14) Stacking boxes and materials</p>	<p>14) Boxes and material falling over</p>	<p>14) Avoid large stacks of heavy materials and ensure to store heavy objects close to the floor and lighter objects up higher.</p>	<p>L</p>
<p>15) Using Paper cutters, letter openers, exacto knives, box knives, utility scrapers, scissors, and paper shredders. (Cutting Hazards), staplers, staple removers, hole-punchers, pens, pencils, thumbtacks, push pins, message spindles.</p>	<p>15) Cut and puncture hazard</p>	<p>15) Use the equipment for its intended purpose, do not improvise. Always use any safety guard on the equipment and keep them in place when the equipment is not in use. close the cutting arm on a paper cutter and activate the armguard).</p>	<p>L</p>
<p>16) Talking on cell phone.</p>	<p>16) Driver distraction; vehicle collision; Slip, trips, same surface falls, etc.</p>	<p>16) Never talk on cell phone when driving. Only use a hand-free device when talking on cell phone or pull over to a safe area. Never text while operating a motor vehicle. Never text call while walking, or on an elevated surface. Never talk on your phone while walking on the project site or on an elevated surface unless safe to do so. Keep away from operating equipment.</p>	<p>L</p>

<p>17) Travel to and from meetings and project sites (personal vehicle, rental car, train-stations, and airports).</p> <p>18) Walking in and around vehicular traffic and mechanized construction equipment.</p> <p>19) Making site visits (project sites)</p>	<p>17) Miscellaneous hazards (vehicle collision, getting lost, theft, injury, etc.)</p> <p>18) Struck by</p> <p>19) Overall site-specific construction hazards</p>	<p>17) Stay alert and ensure the vehicle to be used is in safe working order. Inspect the vehicle prior to use to include but not limited to - tires, lights, motor oil level, brakes and windshield wiper condition. Always plan the trip fully prior to leaving or returning. Drive with the vehicle doors locked. Keep plenty of gasoline in the vehicle's tank. Operate the vehicle in the safest manner road conditions will allow. Observe all traffic laws. Participate in defensive driving. Seat belt must be used at all times. Use caution when in and around airports. Stay in area where there is other people. Use restroom facilities that are located near to public areas. Be aware of people around you. Pack travel baggage/equipment that will not exceed the safe lifting weight (depends on individuals) and use proper lifting techniques.</p> <p>18) Wear high visibility safety vest (minimum class II). Always make eye contact with the equipment operator. Make sure the vehicle driver and/or the equipment operator sees you.</p> <p>19) Review and sign-off the site- specific Activity Hazard Analysis (AHA) for each delivery order.</p>	<p>L</p> <p>L</p> <p>L</p>
<p>Equipment to be Used</p>	<p>Training Requirements/Competent or Qualified Personnel name(s)</p>	<p>Inspection Requirements</p>	
<ul style="list-style-type: none"> • Computer/ workstation • Ladders/stepstool • PPE, hardhat, safety glasses, boots, gloves • Paper cutter, Paper shredder • AED • First Aid Kit • Fire Extinguisher • GFCI • Motor vehicle 	<ul style="list-style-type: none"> • Workstation Safety • Ladder safety • PPE use • Office equipment use • CPR/ FA/ AED • CPR/ FA • Fire extinguisher usage • GFCI usage • Driver's license 	<ul style="list-style-type: none"> • Inspect before use • Inspect before use • Inspect before use • Inspection of PPE before use • Inspect monthly • Inspect weekly and prior to sending to the jobsite • Inspect Monthly • Inspect before use • Inspection of motor vehicle before use 	



Subcontractor Qualification Form

0206500_CP_11_06_en_A3.2

Please complete the following to the best of your ability to submit and be pre-approved to perform work for Centennial or its JV Partners. To review Centennial's standard Terms and Conditions and/or state-specific supplemental Terms and Conditions: <http://www.cce-inc.com/subcontracts/>

Prequalification and/or evaluation of your firm cannot be completed without this information. Visit <http://www.cce-inc.com> to learn more about Centennial.

1. Company Information

Company Name *

Input company name as listed on current W-9 form.

Mailing Address *

City *

State *

Zip (9 Digits) *

To find your 9 digit zip code (the Zip +4) go to: <http://zip4.usps.com/zip4/welcom&jsR>

Contact Name *

Contact Title

Office Phone *

Cell Phone

Contact Email *

Fax Number

Bid Requests

Click box if bid request should be sent to someone different than the contact listed above.

Contractor's License Number

Federal Tax ID Number *

Primary Trade *

Secondary Trade

2. Organization Information

SIC/NAICS Code(s)

You can find your NAICS (North American Industry Classification System) code here: <http://www.census.gov/eos/www/naics/>

DUNS Number

If your firm does not have a DUNS Number, you may request one from Dun & Bradstreet, Inc. at <http://www.dnb.com/get-a-duns-number.html>

Organization Type

- Sole Proprietor LLC Partnership
 C-Corporation S-Corporation Joint Venture
 LLP

Number of Employees

Number of years in Business



Subcontractor Qualification Form

0206500_CP_11_06_en_A3.1

Annual Volume \$

Union(s) Affiliation - Name and Local Number

Apprentice Program Participant

3. Business Status

Please attach Certificate, as applicable, where indicated at the end of this form.

Business Status *

Select all that apply.

4. Bonding Information

Centennial may require a subcontractor to bond depending on the project requirements. A project with hazardous activities must be bonded.

Can company provide a bond?

 Yes No

5. HSEQ (Health, Safety, Environment, and Quality)

A Safety orientation must be scheduled with a Project Safety Manager prior to starting work on our project sites. This includes submitting a written Company Safety Program and Accident Prevention Plan (APP).

Company Safety Program *

Does your company have a Safety Program/Accident Prevention Plan (APP) in place?

Has your company been cited by OSHA/State for a safety violation in the last five (5) years? *

 Yes No

Experience Modification Rate (EMR)

Please list your firm's Experience Modification Rate for the most recent three years.

Modification Rate 2020

Modification Rate 2019

Modification Rate 2018

Recordable Incident Rate

Your firm's injury and illness rate (example: number of recordable incidents/illness multiplied by 200,000, divided by number of work hours on an annual basis = $3 \times 200,000 / 500,000 = 1.2$ (for every 100 employees, 1.2 are injured or ill).

6. Experience

Identify contract and building types your firm has worked on

Project References

List at least three (3) completed projects:

Project Reference 1

Project Name

Project Reference 2

Project Name

Project Reference 3

Project Name

7. Credit References

List at least three (3) credit references.

Reference 1

Supplier/Vendor Name

Reference 2

Supplier/Vendor Name

Reference 3

Supplier/Vendor Name

Send me a copy of my responses

Submit

Site Safety Rules

- 1) Each subcontractor must have a **competent person** onsite whenever work is being performed. Prior to starting work, the Subcontractor must provide Centennial a letter designating its competent persons for the project.
- 2) All personnel must attend a **safety orientation** prior to accessing a jobsite and attend weekly toolbox talks.
- 3) All **incidents** must be reported to the Centennial jobsite representative immediately. Post-incident Substance Abuse Tests may be conducted as determined by a Centennial Regional HSEQ Manager.
- 4) All personnel must be **trained in the hazards** associated with their job and such training documented.
- 5) Each subcontractor is responsible for supplying its employees with all required **personal protective equipment** (“PPE”) appropriate for the tasks being performed. Additionally, the subcontractor must provide its own **GFCIs, First-Aid Kit(s), and fire extinguisher(s)** in the work area.
- 6) Everyone must wear their **hard hats** with the brim facing forward when on the jobsite. Unapproved headgear such as ball caps, hoodies, and wool caps may not be worn under any hard hat.
- 7) **Hearing protection** must be worn when sound levels exceed 85dBA.
- 8) **Safety glasses** meeting ANSI Z87.1 must always be worn on the project site. Prescription safety glasses must have permanently affixed side shields. Personnel performing hot work or laser assisted work must wear appropriately shaded and protective eye protection.
- 9) When **respiratory protection** is required, personnel must possess and present fit test and medical evaluation documentation prior to beginning any work on site.
- 10) No employee may wear torn or tattered **clothing**, sweatpants, short pants, or shirts without sleeves.
- 11) Personnel onsite must wear **hand protection** with a minimum ANSI Cut Level 2 Rating unless other protection is defined within the AHA for a specific work activity.
- 12) Leather **work boots** must always be worn on the jobsite. Work boots must meet ASTM criteria to protect from falling objects, chemicals, punctures, and slips. Steel or composite toe work boots meeting or exceeding ASTM F2413 must be worn when required by the AHA and are recommended in all cases. No athletic shoes (without ASTM certification), canvas shoes, or leather soled shoes may be worn at the job site.
- 13) **Fuel cans** must be constructed of metal and incorporate a flame arrestor. The contents of any fuel can must be labeled per the OSHA Hazard Communication Standard (which aligns with the GHS).
- 14) Subcontractors must provide **fire extinguishers** within 50 feet of all flammables. Subcontractor must ensure that the maximum travel distance to their nearest fire extinguisher does not exceed 75 feet.
- 15) Subcontractors must provide their personnel with **fall protection** when the work platform is six feet or greater above grade, above four feet on a federal military installation, or if a known fall hazard exists at any height.
- 16) Hand and power **tools** must always be in proper working condition and must have all manufacturer required safety guards and legible safety labels.
- 17) Power tools may not have damaged **power cords**. An approved GFCI or GFCI-protected branch circuit must be used for all power tool operations. All extension cords must be UL listed, designed for hard- or extra-hard use, and be minimum 14 gauge/three wire type (with a heavier gauge for cord lengths over 50 feet). The subcontractor must protect cords against pinching and cutting.
- 18) Workers are forbidden from working on **scaffolding** with missing or improper planks, guard rails, cross bracing, pins, mud sills, or toe boards. Workers are forbidden from working on scaffolding that does not have a ladder or other approved safe access. All scaffolds must be inspected, approved, and “TAGGED” prior to employee use by the scaffolding competent person. Mobile scaffolding must have all four wheels locked while in use and may not be pulled along by its users. The project superintendent must be notified of all erected scaffolding prior to its use.
- 19) **Ladders** must be minimum heavy-duty (Type I) or greater. Ladders must be secured from displacement at the top and bottom and employees must face the ladder when climbing up or down as well as when while working on the ladders. Extension ladders must extend at least three feet above the platform landing. Stepladders may only be used in the fully open position. DO NOT stand above the second step from the top of a stepladder. DO NOT carry tools or materials up the ladder when climbing or descending. Always maintain a firm grip (3-point contact) when climbing or descending a ladder. All required ladder manufacturer warning and capacity labels must be in place and legible.
- 20) Any personnel operating **equipment** must be properly trained, and the Subcontractor must provide a completed Letter of Designation attesting to training. Forklift operators must have a training verification card in possession.
- 21) At no time may an employee use or store any unsafe material or **defective tools** or equipment on site.

Centennial reserves the right to remove individuals from the job site for first time safety infractions if they are deemed as a serious safety and health violation. The subcontractor’s senior personnel will be notified, and Centennial will document the incident in accordance with its subcontractor Discipline Policy.

HSEQ Non-Conformance Form

0206500_CP_11_06_en_A5.4



CENTENNIAL

A BILFINGER COMPANY

Instructions: Fill in the HSEQ non-conformance form below. Include all pertinent / site specific information.

Project Title / Contract Number:

Employee Name / Company:

Date of the Event: Subcontractor Involved? Yes No

Time of the Event:

HSEQ Non-Conformance Information

HSEQ Non-Conformance Type:

Describe HSEQ Non-Conformance:

Regulations/Policies Violated: Federal OSHA Violation USACE EM 385-1-1
 State Regulation Violation Centennial Policy

HSEQ consequence Management

Categories: 1) Severe Deviation 2) Major Deviation
 3) Minor Deviation

Additional Notes / Comments

Comments / Notes:

Acknowledgment

Employee Review (name):

Issued By (name / title):

HSEQ Mngr Review (name / title):

Date Reviewed:

Centennial Health, Safety, Environment & Quality



HSEQ Jobsite Binder



CENTENNIAL

A BILFINGER COMPANY

HSEQ

Jobsite Binder

Project Information

Project Name:

Contract Number:

Project Manager:

Project Superintendent:

Date:

Project Location (address):

Centennial Office Contact Info:

Phone:

Fax:

1	Project Site Visitors Log (<i>sign in sheet</i>)
2	Site Specific HSEQ Plan
3	Weekly Toolbox Safety Meetings
4	Activity Hazard Analyses (AHA)
5	HSEQ Site Inspection
6	High Risk Plan
7	Permits
8	Safety Data Sheets & Environmental
9	Near Miss & Incident Reporting Forms
10	Letter(s) of Designation
11	Training Documentation
12	Respiratory (Appendix D)
13	Inspection Forms
14	Miscellaneous
15	Operations

Reglas De Seguridad Del Sitio

1. Cada subcontratista deberá tener una persona competente en el lugar y proporcionar una carta de designación completa como tal.
2. Todo el personal debe asistir a una orientación de seguridad antes de acceder a un lugar de trabajo y asistir a charlas semanales de caja de herramientas.
3. Informe todos los incidentes al representante del sitio de trabajo de Centennial inmediatamente. Las pruebas de abuso de sustancias posteriores al incidente se realizarán en función de una causa razonable según lo determine un gerente regional de Centennial HSEQ.
4. Todo el personal debe estar capacitado en los peligros asociados con su trabajo y dicha capacitación debe estar documentada.
5. Cada subcontratista es responsable de proporcionar a sus empleados todo el equipo de protección personal requerido, que incluye un GFCI, un botiquín de primeros auxilios y un extintor de incendios en el área de trabajo.
6. Siempre se debe usar un casco con el ala hacia adelante cuando se esté en el lugar de trabajo. No se deben usar artículos para la cabeza no aprobados, como gorras de béisbol, sudaderas con capucha y gorros de lana debajo del casco.
7. Se debe usar protección auditiva cuando los niveles de sonido superen los 85 dBA.
8. Siempre se deben usar lentes de seguridad que cumplan con ANSI Z87.1 en el sitio del proyecto. Los anteojos de seguridad recetados deben tener protectores laterales fijados permanentemente. El personal que realice trabajo en caliente o asistido por láser deberá usar protección ocular adecuada con sombra o protección.
9. Cuando se requiera protección respiratoria, el personal deberá proporcionar documentación de prueba de ajuste y evaluación médica.
10. Ningún empleado puede usar ropa rasgada o hecha jirones, pantalones deportivos, pantalones cortos o camisas sin mangas.
11. El personal en el sitio debe usar protección para las manos con una calificación mínima de nivel de corte ANSI 2, a menos que se defina otra protección dentro de la AHA para una actividad laboral específica.
12. Siempre se deben usar botas de trabajo de cuero (u otro calzado de protección aprobado por ASTM) para protegerse de la caída de objetos, productos químicos o pisar objetos afilados. En algunos casos, puede ser necesario usar calzado de seguridad con punta. No se deben usar zapatos deportivos o de lona.
13. Las latas de combustible deben estar hechas de metal, incorporar un parachispas / parallamas y el contenido debe estar etiquetado según la norma OSHA HazCom/GHS.
14. Los extintores de incendios se requieren dentro de los 50 pies de todos los materiales inflamables y la distancia máxima de viaje hasta el extintor de incendios más cercano no debe exceder los 75 pies.
15. Todo el personal debe estar protegido contra caídas de seis pies o más o si existe un peligro de caída conocido a cualquier altura.
16. Las herramientas manuales y eléctricas deben estar siempre en buenas condiciones de funcionamiento y deben tener todas las protecciones de seguridad requeridas por el fabricante.
17. Las herramientas eléctricas no deben tener cables eléctricos dañados. Siempre se debe utilizar un circuito derivado aprobado GFCI o GFCI protegido para operaciones con herramientas eléctricas. Todos los cables de extensión deben tener un mínimo de 14/3, diseñados para uso intensivo y listados por UL. Los cables deben protegerse contra pellizcos y cortes.
18. No se permitirá que ningún empleado trabaje en andamios con tabloneros, barandillas, riostras transversales, pasadores, umbrales de barro, tablas de pie faltantes o incorrectos o que no tenga una escalera u otro acceso seguro aprobado. Todos los andamios deben ser inspeccionados, aprobados y "ETIQUETADOS" antes de que los empleados los utilicen la persona competente. Los andamios móviles deben tener las cuatro ruedas bloqueadas mientras están en uso y no deben ser arrastrados por sus pasajeros. Se notificará al superintendente del proyecto de todos los andamios erigidos antes de su uso.
19. Las escaleras deben ser de un mínimo de resistencia (Tipo I) o mayor. Las escaleras deben estar aseguradas para que no se desplacen en la parte superior e inferior y los empleados deben mirar hacia la escalera cuando suben o bajan y mientras trabajan en escaleras. Las escaleras de extensión deben extenderse al menos 3 pies por encima del rellano de la plataforma. Las escaleras de mano se deben usar en la posición completamente abierta. NO se pare sobre el segundo escalón desde lo alto de una escalera de mano. NO cargue herramientas o materiales por la escalera al subir o bajar. Mantenga siempre un agarre firme (contacto de 3 puntos) al subir o bajar una escalera. Todas las etiquetas de capacidad y advertencia requeridas por el fabricante de escaleras deben estar en su lugar y ser legibles.
20. Todo el personal que opere el equipo deberá estar debidamente capacitado y proporcionar una Carta de designación completa como tal. Los operadores de montacargas deben tener una tarjeta de verificación de capacitación en posesión.
21. En ningún momento un empleado utilizará o almacenará ningún material inseguro o herramientas o equipos defectuosos en el sitio.

Centennial reserva el derecho de sacar a las personas del lugar de trabajo por primera vez por infracciones de seguridad si se consideran una infracción grave de seguridad y salud. Se notificará al propietario del subcontratista y se documentará la acción de acuerdo con la Política de disciplina de Centennial.

Centennial Field Operations Activity Hazard Analysis (AHA)

Activity/Work Task:	Overall Risk Assessment Code (RAC) (Use highest code)					
Project Location:	Risk Assessment Code (RAC) Matrix					
Contract Number:	Severity	Probability				
Date Prepared:		Frequent	Likely	Occasional	Seldom	Unlikely
Prepared by (Name/Title):	Catastrophic	E	E	H	H	M
Reviewed by (Name/Title):	Critical	E	H	H	M	L
	Marginal	H	M	M	L	L
	Negligible	M	L	L	L	L
<p>Notes: (Field Notes, Review Comments, etc.) PPE for all activities on site shall include at a minimum: ANSI Z89.1 Hardhat, ANSI Z87.1 safety glasses, leather work shoes or boots, short sleeve (min 4" sleeve) shirt, long pants and gloves meeting ANSI Cut Level A2 and Abrasion Level A2. High visibility vest (minimum class II). Class B First Aid Kit available on-site. This AHA is required to be reviewed prior to the start of work and updated as necessary to reflect the scope of work and work procedures taking place. Report any unsafe acts or conditions to supervisor.</p>	Step 1: Review each "Hazard" with identified safety "Controls" and determine RAC (See above)					
	"Probability" is the likelihood to cause an incident, near miss, or accident and identified as: Frequent, Likely, Occasional, Seldom or Unlikely.				RAC Chart	
	"Severity" is the outcome/degree if an incident, near miss, or accident did occur and identified as: Catastrophic, Critical, Marginal, or Negligible				E = Extremely High Risk	
	Step 2: Identify the RAC (Probability/Severity) as E, H, M, or L for each "Hazard" on AHA. Annotate the overall highest RAC at the top of AHA.				H = High Risk	
				M = Moderate Risk		
				L = Low Risk		
Job Steps	Hazards	Controls			RAC	

Letter of Designation

0206500_CP_11_06_en_A9



CENTENNIAL

A BILFINGER COMPANY

Employer Name _____

The employee designated herein is determined by their employer to have knowledge of systems, equipment, conditions and procedures, proper use, inspection, manufacturer's recommendations, and maintenance for the designation(s) below.

_____ is designated as a: (indicate with an "X" in appropriate boxes)

Employee Name (Print)

- Competent person** - one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.
(ex. fall protection, excavations, confined space, scaffolds, lead, silica, asbestos, etc.)

- Qualified person** - one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training and experience, has successfully demonstrated the ability to solve or resolve problems relating to subject matter, work, or a project.
(ex. fall protection design, shoring design, scaffold design, electrical / LOTO, etc.)

- Authorized person** – one who is permitted by an employer to perform a specific task or to be in a specific location at a jobsite and has the appropriate training to perform the task and recognize hazards related to the task or surroundings *(ex. power tool operation, fall protection, equipment operator, working in a Controlled Access Zone, etc.)*

Note: *The employer shall attach any certifications, degrees, licenses or comparable documentation to verify authorization, competency and/or qualification of said employee to this letter.*

Employer Company Official (Print Name) _____

Employer Company Official Title (Print) _____

Employer Company Official (Signature) _____

Date _____

Jobsite Start-up Checklist

0206500_CP_11_06_en_A10



Site Name: _____

Project Manager: _____

Superintendent: _____

JOBSITE REQUIREMENTS	GENERAL COMMENTS
HSEQ Jobsite Binder	
Project Site Visitors log	
Site Specific HSEQ Plan (reviewed with all subcontractor employees upon arrival)	
Weekly Toolbox Safety Meetings (Should apply to the work being performed)	
Activity Hazard Analysis (AHA) for Centennial & all subcontractor definable features of work (DFOW)	
HSEQ Site Inspections (managed through Procore on a weekly basis)	
High Risk Plans (Fall protection, Excavation & Trenching, LOTO, PRCS, etc.)	
Permits (City/County, hot work, energized work, above ceiling, etc.)	
Safety Data Sheets (logged and tabbed)	
AHERA survey or "all clear" letter (materials to be impacted)	
Near Miss & Incident Reporting Forms	
Letters of Designation (minimum of one per subcontractor)	
Training Documentation (subcontractor training cards, certificates, licenses)	
OSHA Appendix D form	
Inspection Forms (equipment, trenches, scaffolds, etc. Can be managed in Procore)	
Current schedule	
Jobsite Box or Container	
Additional PPE: visitor Hardhat, hi vis vest, safety glasses (Z87.1), hand protection (minimum cut/abrasion level 2), hearing protection	
Class B first aid kit meeting ANSI/ISEA Z308.1 (Sealed and unused or properly inventoried)	
Bottles of eyewash (valid expiration date)	
Ground Fault Circuit Interrupter (GFCI)	
5 LB. ABC Fire Extinguisher (At a minimum) with current annual inspection	
Project Setup, Safety Postings, Barriers	
Minimum posting requirements: PPE requirements, four leading causes of fatalities in construction, Instructions for subcontractors to provide first aid kit, GFCI, fire extinguisher, OSHA "It's the Law" poster, Emergency contact info, Map, and route to nearest hospital and occupational clinic, "Safety First" posting, rally point map	
Work/Storage Areas approved & Posted/Barricaded/Fenced, etc.	
Toilet with Hand Washing Facility	
Temporary power requirements?	
Jobsite Orientations (site specific safety plan, 3C's)	
QC Management	
QC Management requirements	
Testing and inspection requirements, special inspectors?	
Owner, client meetings	
Commissioning schedule/plan	

Centennial Employee Signature: _____ Date/Time:

--	--