

# H-01 CONTRACTOR SAFETY MANAGEMENT

## REFERENCES:

29CFR1910  
29CFR1926  
Contract Worker EHS – CR2026  
Contract Worker EHS – TS26026  
HSF Version 2.0 – Element 11  
Gensuite Condition Reporting Tool  
ComplyWorks Tool  
CP-07-02  
CP-07-03  
WI-07-003-01

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1.1

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## 1. PURPOSE

To ensure that contractors and subcontractors performing work for GEH at a GEH fixed facility or Services activities can perform work maintaining the high standards with regards to Environment, Health and Safety. Ensure that Contractors performing work at GEH fixed facilities and Services maintain responsibility for the safety of their employees, host employees and the community.

## 2. SCOPE

These requirements apply to all GEH businesses and joint ventures where GEH is the controlling (>50%) or operating partner. It applies to fixed facilities, projects & services, sales, office only, and leased (contingent) worker workforces.

## 3. DEFINITIONS

**3.1. Contract Worker or Company** – Persons hired to perform task(s) for GEH, either as 1) independent contractors, 2) Scope of Work non-core contractors (providing an unique service), or 3) Scope of work core contractors (providing a well-defined scope of work that can be similarly or complementary to work done by GEH).

**3.2. Comply Works** – Third party full contractor management tool.

**3.3. Hazard Category** - Classification of risk level based on Risk Hazard matrix for type of work activities (minor, significant, severe).

- 3.4. Incident** – EHS incidents include any work-related Fatality, Injury, Illness, Near Miss, Potentially Severe Event (PSE), Property Damage and Environmental event.
- 3.5. Leased Worker** - Persons who are not GEH employees and who are employed by a third-party staffing agency and assigned to work at a GEH location or Services activity on a temporary basis.
- 3.5. Project Manager** – A GEH Employee (or designee) responsible for work activities which use contract companies or contracted labor.
- 3.6. Pre-Job Brief** - short daily meeting(s) prior to start work when a supervisor/manager briefs his employees on the specific hazards and control measures applicable for the task they are going to carry on.
- 3.7. Condition Reporting** – management tool use for tracking incidents and actions, including contractor infractions.

## **4. RESPONSIBILITIES**

- 4.1. GEH EHS Contractor Lead** – Maintain the Business Contractor Safety Management procedure; provide technical support to Site/Area and Services EHS (as needed), Support Operations and Sourcing with implementation.
- 4.2. Site/Area or Services EHS Lead** – Follow up and work with contractors in EHS Improvement plans as applicable as related to ComplyWorks certification (or other, as applicable); Final EHS decision on Contractor Qualifications in ComplyWorks (emergency and other as appropriate); Assist with Project Manager(s) on 1) contractor identification, selection and EHS qualification via ComplyWorks, 2) pre-mobilization activities as needed, 3) ensuring any other country, state, local area or other site/services specific requirements are in place and 4) approving SDS for chemicals to be used by contract companies at site/areas or service locations.
- 4.3. GEH Project Manager** – Oversee contract work activities and projects from initial bid thru completion. Provide Contract company & workers instructions on site specific procedures to be followed while performing work on-site. Actively engage their contract companies to activate their account(s), obtain certification/approval and any follow ups as needed to maintain EHS approval status. Ensure contractors are approved in ComplyWorks before coming onsite or have site EHS Emergency/Other approvals.

**4.4. Sourcing** – Pre-notify contract companies of process and requirements for EHS qualification via Comply Works to obtain EHS approval prior to working on-site; Assist Project Manager & EHS in ensure all contractors that perform work/services for GE are approved before a PO approved.

**4.5. Contract Companies** – Activate account and complete EHS Approvals, including addressing any gaps; Maintain information in ComplyWorks current and re-qualify at frequency based on hazard category. Provide additional information (ex: SDS to be used, load/lift plans for critical lifts, permits needed for work activities, etc.). Inform the GEH Project manager of any incidents which may occur during the performance of the work activities, identification/completion and communication of appropriate follow up actions. Follow all GEH site and services procedures and protocols, as applicable. Additionally, contractors are responsible to ensure that their contractors (GEH project sub-contractors) are properly vetted from an EHS standpoint.

## 5. PROCEDURE

### 5.1. Contract Pre-Qualification (*ref Attachment 8.1.*) and Re-Qualification

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**NOTE** – *Companies that provided leased workers are exempted from ComplyWorks EHS Qualification. Leased Worker EHS Metrics to be included in GEH Site/Area or Services*

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**5.1.1.** GE shall prequalify those Contract Worker Companies that GE hires directly.

**5.1.2.** Project Manager identified need for Contractor Work and type of contractor to be used (either Leased or other Contract work with Scope of Work).

**5.1.3.** Project Manager contact EHS Site/Area or Services EHS lead to check status of the contract companies bidding based on the work scope.

**5.1.4.** Site EHS/Area or Services lead shall check status of the contract company in ComplyWorks. IF the contract company is listed and **APPROVED** in the ComplyWorks tool for the site/area or Services and for the appropriate hazard risk, per the work scope, then:

- 1) **IF** the contract company is Approved for the GEH site/area or Services work scope, **THEN** the project can proceed using the contractor selected

**OR**

2) **IF** the contract company is Approved for GE scope of work but not the GEH site/area or Services, the EHS Lead shall initiate actions to have the organization added for work activities in ComplyWorks, **THEN** the project can proceed using the contractor selected.

**5.1.5.** A Contract company not in ComplyWorks tool, the Project Manager shall initiate the Contractor Add Template (Attachment 8.2.) by completing all yellow highlighted section of the template, provide to the EHS Site/Area or Services lead and contact Sourcing.

**5.1.6.** Sourcing, when contacted by the Project Manager, regarding a new approval request, shall communicate to the contract company of the process being initiated to get the contractor approved, using the Template Letter to Contractors (Attachment 8.3).

**5.1.7.** EHS Site/Area or Services lead shall review and complete the remaining sections of the Contractor Add template and upload the initial information in the ComplyWorks tool to initiate approvals.

**5.1.8.** Contract company in Comply Works but not approved, the Site/Area or Services EHS, Project Manager and Sourcing shall work with the contract company to assist in completion of any gaps identified to complete their approvals, as needed.

**5.1.9.** Site/Area or Services EHS Lead has the final decision on Contract Worker Company qualification in ComplyWorks. Depending on the results of the prequalification, the Contract Worker Company shall be Approved, Conditionally Approved or Not Approved. The approval process shall be completed in ComplyWorks through the Approval - Upgrade/Downgrade process below:

1) Upgrade – After ComplyWorks completes the document review and provides a summary of any gaps and an overall score, the Site/Area or Services EHS Lead can upgrade a Contract Work Company based on review of gaps and documented improvement plan (risk mitigation plan). The score remains the same and should reflect the questionnaire answers and documents provided, however the Class Compliance Rating can be upgraded to Approved

**OR**

- 2) Downgrade – EHS Leads has the ability, based on field experience, observations of Contract Workers not following their procedures to downgrade a Contract Worker Company, if required.

**5.1.10.** Contract company shall requalify their ComplyWorks when notification is provided from ComplyWorks for items needed to maintain qualification for GEH contracted work activities. If the contract company, fails to maintain ComplyWorks qualifications, including routine updates per their Risk Hazard frequency, the contract company will be removed from the approved status and will need to re-qualify.

## **5.2. Emergency Approvals**

5.2.1. When an emergency exists, and a Contract Worker Company is required on site within 3 businesses days, a temporary 30-day Emergency Approval can be obtained. The ComplyWorks GE User requesting the Emergency Approval in ComplyWorks, takes on the responsibility to ensure the Contract Worker Company meets GE requirements or has adequate defenses in place to mitigate EHS risks.

5.2.2. During the temporary 30-day Emergency Approval the Contract Worker Company should follow the standard process and complete the GE questionnaire and provide supporting documentation

5.2.3. For contract companies that do not complete their ComplyWorks EHS qualification within the 30-day, the Site/Services EHS lead will evaluate the company for any future work at the facility based on review of previous work activities performed, safety performance, programs and status.

## **5.3. Contractor Oversight**

**5.3.1.** For contracted work scope designated as **SEVERE** (ref attachment 8.4), the contract company shall be provided to Site/Area or Services EHS to review and approve, prior to commencement of the work, documentation regarding the project, examples include, but not limited to 1) Safe Work plan (ref attachment 8.6, as optional if contract company does not have their own), 2) Risk assessments, 3) lifting plans, 4) records of inspection of machines, 5) proof of competencies (training certificates & licenses), 6) calibration certificates for monitoring equipment/instrumentation, 7) Workers Compensation, 8) SDSs and any applicable regulatory or other documentation required for the project work scope.

**5.3.2.** A pre-job discussion (kick off meeting) shall take place for all **SEVERE** hazard work to be performed by Contract Workers, led by the GEH Project Manager. This shall include the site/area or services EHS representative to meet with an authorized contract representative from the Contract Worker Company that will perform severe hazard work prior to start of work. Operation-specific EHS information exchange should include, as appropriate (examples include 1) Review of applicable permits, 2) review of site-specific requirements for work activities and access and 3) Responsibilities of personnel performing activities (Severe, Significant and Minor), as applicable. In addition, any other GEH contractor site or location requirements, as applicable. Prior to commencement of the work activities the GEH Project Manager shall communicate, as appropriate, inform site worker(s) of potential safety and environmental hazards created by nearby contract worker activities.

**5.3.3.** For **NON-SEVERE** contracted work activities, the Project Manager shall review with the contractor management and employees the expectations from an EHS standpoint prior to initiating the work, including housekeeping and other practices to ensure the project is maintained. In addition, any other GEH contractor EHS site or location requirements, as applicable. Prior to commencement of the work activities the GEH Project Manager shall communicate, as appropriate, inform site worker(s) of potential safety and environmental hazards created by nearby contract worker activities.

**5.3.4.** Pre-job Briefs shall be conducted daily for GEH and contractor work activities.

**5.3.5.** For **SEVERE** work activities, contract companies shall conduct daily end-of-shift inspections of the worksite and communicate to the GEH Project Manager any items that GEH needs to address (a Condition Report, as appropriate, will be initiated to track any items that GEH cannot address with actions and follow up to the contract company and workers prior to the start of the next day/shift work activities).

**5.3.7.** For Construction and **SEVERE** contractor activities, construction/area inspections and reviews shall be conducted by GEH at the below frequency, or more often as needed:

1) GEH Project Manager (or designee) – weekly

**AND**

2) GEH Site/Area or Services EHS Lead (or designee) – monthly

**AND**

- 3) For long term construction or other SEVERE contractor activities (>90 days), periodic reviews with the GEH Project Manager, Site/Area or Services EHS lead and the contract company management shall be conducted.

**AND**

- 4) Additional reviews, as determined by the Site/Area or Services EHS lead, based on the contract company EHS performance.

Items identified for corrective actions are to be communicated and addressed by the Contract Company and workers. A Condition Report, as appropriate, will be initiated to track any items that GEH cannot address with actions and follow up to the contract company and workers prior to the start of the next day/shift work activities.

- 5.3.7.** Contract Workers and unsupervised visitors are required to follow all rules outlined by GE. Repeated EHS non-compliances and findings shall be actioned as with any other type contractual default.

- 5.3.7.1.** EHS Violation by Contract Worker shall be documented by the Project Manager and communicated to the Contract Worker Company management.

- 5.3.7.2.** Safety infractions shall be re-evaluated to verify and document completion of corrective action(s) by the Contract Worker Company.

- 5.3.7.3.** Any Contractor Worker who violates any provision of this procedure or otherwise engages in conduct, which is likely to cause an EHS incident shall be removed from the work site.

- 5.3.7.4.** The Contractor Worker Company shall not re-assign any removed Contract Worker to perform work without the notification and advance approval of the Responsible Manager, or designee.

- 5.3.7.5.** The Contract Worker Company shall be solely responsible for discipline of Contract Workers.

- 5.3.8.** Contractor companies and workers are to report immediately to their GEH Project Manager any incidents (injuries, near miss or procedural issues/concerns). Work activities shall be suspended, as appropriate.

- 5.3.8.1.** The GEH Project Manager shall contact the Site/Area or Services EHS Lead to evaluate conditions and action needed to re-start the work activities or issue a STOP WORK notice.

- 5.3.8.2.** A Condition Report shall be generated by the GEH Project manager to track the contractor infraction or condition which led to the incident.

**5.3.8.3.** For contract companies that have indicated performance below the expectations for contractors working for GEH, GEH EHS, Sourcing and the Project Manager will hold reviews (quarterly or more often as needed) with the contractor management to re-review the deficiencies and assist the contract company in developing a corrective action to address these deficiencies. Contract management will provide GEH with routine status on their improvement plan and its effectiveness.

**5.3.8.4** Based on contract company performance by the Site/Area or Services EHS lead and GEH Project Manager, GEH shall deem any contract company who has severe misses or repeated unacceptable practices to be removed from the site and downgrade/remove the contract company from the ComplyWorks approved list (this is a GE wide list and will be maintained in ComplyWorks).

#### **5.4. Contractor Training**

**5.4.1.** Review of training programs is conducted during the ComplyWork pre- and re-qualification process. The contract company management is to ensure all personnel working for a fixed facility or services have all current qualifications to perform the work activities contracted for.

**5.4.2.** Contract workers shall complete applicable site and/or services orientation to familiarize themselves with the general EHS requirements for working on-site, including site or services specific requirements not covered by this procedure (Attachment 8.5) including, but not limited to the below items:

- 1) How to raise EHS and other compliance concerns
- 2) Safety Conscious Work Environment
- 3) STOP WORK
- 4) Safety risk assessments, Method Statements, Life Safe Principles (LSPs)
- 5) GE/customer program expectations
- 6) Site specific equipment, and specific GE/customer processes or work practices they will be required to execute
- 7) Information on hazards, including Safety Data Sheets (SDS) for potential hazards in the Contract Worker's work area
- 8) Any additional business or P&L specific requirements

## **5.5. Case by Case Deviations**

Any deviation from requirement(s) set out in the Core Requirements and Technical Standard shall follow the process established by the Business. Each site's deviation process shall be documented and include, at a minimum, a requirement for a risk assessment and appropriate review/approval of hazard control and mitigations prior to deviation approval. The site/services process for Deviations from these Requirements shall be reviewed and approved by GEH EHS Contractor Lead.

## **5.6. Site/Services Specific Requirements and Exceptions**

Site-Specific Requirements may be more restrictive than current business or site notification requirements for fixed facility or services contractor work activities; These will be documented for each site/area or services organization documented on the Site-Specific Requirements (Attachment 8.5).

**5.6.1.** Site or Services Exceptions to this procedure, may be approved by the Site/Area or Services EHS on a case by case basis, provided they are more restrictive than the business procedural requirements; for other exceptions, these require GEH EHS approval.

**5.6.2.** For exceptions to the business procedure, these will be documented by the Site/Area or Services EHS Lead initiating a Condition Report to track how the exception is implemented for the site/area or services organization.

**5.6.3.** References to site or services specific procedures to be utilized for contract work at the site/area or services location.

## **6. TRAINING & DOCUMENTATION**

### **6.1. Training**

**6.1.1.** GEH Project Managers – upon initial assignment a Project Manager(s), the EHS Site/Area or Services lead shall provide a copy of the GEH EHS Business and site-specific procedures covering contractor safety management.

**6.1.2.** Site/Area and Services EHS – upon assignment as the Contractor lead for the Organization/Location, the Site/Area and Services EHS Lead shall initiate an account in ComplyWorks. Link to the OneEHS Contractor Management Home Page, where training videos and other ComplyWorks links, access to training documents, procedures and process descriptions, is below:

<http://oneehs.ge.com/health-safety/contractor-and-construction-safety/>

## **6.2. Documentation**

**6.2.1.** Each site or services organization shall maintain a list of Project Managers, which will be reviewed and updated annually. These reviews should be tracked in an appropriate data base (ex: Gensuite Compliance Calendar Module for the site).

**6.2.2.** Documentation for contractor(s) qualified at each site for the business will be tracked in business approved data base (ex: ComplyWorks, or other as site determines) and available to each Site/Area or Services EHS lead.

## **7. PROGRAM EVALUATION:**

**7.1.** Annually, each site shall complete Health & Safety Framework (HSF) 2.0, Contractor Management framework reviews in the Gensuite HSF module for each site. Identified deficiencies shall be entered in the Condition Reporting tool to track disposition and closure.

**7.2.** When HSF 2.0 Contractor Management framework questions are updated, GEH EHS shall review and communicate changes to site/services EHS for implementation.

## **8. Attachments:**

**8.1.** Contractor Approval Process Flow Map

**8.2.** Contractor Add Template

**8.3.** Template Letter to Contractors

**8.4.** Risk Hazard Matrix

**8.5.** Site Specific Requirements

**8.6.** Safe Work Plan Template

## 9. Document Revision Chart

| Rev. | Section Modified | Revision Description  | Date     | Author      |
|------|------------------|---|----------|-------------|
| 0.0  | ALL              | Initial Issue   | 6/12/20  | E. Anderson |
| 0.1  | Attachment 8.2   | Update Template   | 12/21/20 | A. Emery    |
| 1.0  | Section 4, 5.2   | Clarifications regarding responsibilities in section 4; clarifications on Emergency Approvals in section 5.2; Formatting updates throughout | 2/16/21  | E. Anderson |
| 1.1  | Attachment 8.2   | Update Template   | 2/25/21  | E. Anderson |