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Brunel Energy, Inc. Job Competency

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1. Purpose

1.1. Brunel Energy, Inc., hereinafter referred to as, the "Company," has established a program to establish general job competency requirements.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Definitions

3.1. **Job Competency** is the possession of sufficient knowledge or skills.

4. Responsibilities

- 4.1. Manager(s):
 - 4.1.1. Identifies, updates, and monitors minimum qualification requirements, job titles and training documentation.
 - 4.1.2. Supply training reports to clients and company management.
- 4.2. HSE Supervisor(s):
 - 4.2.1. Ensures all employees assigned to their project meet job competency requirements and complete training identified per job scope.
 - 4.2.2. Ensure any work that may endanger an employee must be completed by an employee who is competent to do the work.
 - 4.2.3. Ensures all employees have sufficient experience to safely perform work without supervision or with only minimal degree of supervision.
- 4.3. Employee(s)
 - 4.3.1. Attend and follow the requirements of safety and health management training.
- 4.4. Subcontractor(s)
 - 4.4.1. Attend and follow the requirements of safety and health management training.

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5. Requirements

- 5.1. Competency is verified before employees are permitted to perform tasks independently.
 - 5.1.1. A competent person (supervisor, lead hand, instructor, etc.) must verify that an employee is competent to perform their roles and responsibilities before being allowed to work independently.
 - 5.1.2. If there is a site short service employee (SSE) program established the new or transferred employee will fall under the SSE requirements as well.

6. Procedure

- 6.1. Job Competency procedures include the following:
 - 6.1.1. Job competency is a combination of knowledge, understanding and skill, and the appropriate level of competence cannot be acquired simply by attending a training session. Understanding and skill are acquired by experience. For individuals involved in exposure to HSE hazards and risks, experience and training are essential. The following must be reviewed when determining the competency assurance:
 - 6.1.1.1. Experience
 - 6.1.1.2. Level of knowledge
 - 6.1.1.3. Capability to perform.
 - 6.1.2. The company's view of competency assurance involves the continuous assessment of training and development needs against a person's responsibilities, abilities, and critical activities.
 - 6.1.3. This process enables the continuous improvement loop that feeds back into training and development activities that ensure competency assurance is an ongoing career cycle process.
 - 6.1.4. Candidate selection and hiring process, includes reference and background check, drug screens, physical assessment.
 - 6.1.5. Experience and qualifications are assessed for initial training.
 - 6.1.6. If further training is required determine if the employee is ready to work or will need onthe-job training. Competency is continually assessed.
 - 6.1.7. Annual performance appraisal is the employee ready to promote or is further training required?

6.2. Identification of Documentation

- 6.2.1. Documentation is obtained from employees to demonstrate they meet the qualifications of their job. Based on the job description requirements documentation may include:
 - 6.2.1.1. Education

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| 6.2.1.2. | Certifications |
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| 6.2.1.3. | Licenses |
| 6.2.1.4. | Training course completion, etc. |
| 6.2.1.5. | Documentation is reviewed and confirmed as actual during the employee hiring process. |

6.3. Identification of Positions

6.3.1. An organizational chart and list of job titles has been established by the Company based on the positions and their exposure to risk their required training is entered into the worksite's training matrix. Job descriptions are prepared for each job title.

6.4. Identification of Qualifications

6.4.1. Minimum qualification requirements for each job title have been established by the Company. Qualifications may include a combination of education, certifications, and work experience. Safety training completion for the indicated job title is required before full qualifications are met to allow an employee to begin work.

6.5. Identification of Training and Competency Needs

6.5.1. Employees (new or transferred) are provided with job specific training related to their roles and responsibilities and trained in the tasks they perform on a regular basis. Training is identified in the Company training matrix which specifies safety and health training needs by job title. Our training is updated based on risks.

7. Training

- 7.1. Delivery of Induction, Transfer & Refresher Training. Employees receive initial induction training. No work by any employee can begin until the orientation is completed.
- 7.2. Training requirements are tracked by the Company and formal training sessions are conducted either on or off site by the Manager or competent/qualified instructor for the required subject matter.
- 7.3. Supervisors and managers receive annual, documented safety management system training.
- 7.4. Training Documentation All training must be documented with date; employee name, employee name; instructor name and title of course.
- 7.5. Each new employee shall receive an orientation prior to beginning any work.
- 7.6. Additional training for identified hazards must be completed prior to employee exposure based upon a hazard assessment.

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8. Recordkeeping

8.1. All training records are maintained on site either by the Manager or senior representative of management or their designee.

9. Reference

9.1. General Safety and Health Provisions - 1926.32