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# Brunel Energy, Inc.

## Short Service Employees (SSE)

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### 1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter, the “Company,” has established a program to prevent work related injuries and illnesses to new hires and temporary workers.

### 2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, personnel 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. **Short-service employee** is an individual who has less than six months experience in the same job type.
- 3.2. **Mentor** is an employee with a minimum of 24 months of experience with the Company (or similar qualified experience from another company within the industry) who possesses the requisite skills and knowledge and is assigned to train an SSE and communicate the Company HSE culture.
- 3.3. **General Awareness Training** is training that provides workers with a basic knowledge of a particular task and enables the worker to identify related hazards. This training may not be sufficient for workers who will be involved with the task on a regular basis.
- 3.4. **Job Safety Analysis (JSA)** is a procedure which helps integrate accepted safety and health principles and practices into a particular task or job operation. In a JSA, each basic step of the job is to identify potential hazards and to recommend the safest way to do the job.
- 3.5. **Qualification Training** is training that provides workers with full knowledge of a subject and enables the worker to identify related hazards. This training meets all requirements for workers who will be involved with the task on a regular basis.
- 3.6. **Refresher Training** is training focused to review and “refresh” a worker’s knowledge on a subject. Such training will focus on pertinent details of the task. This training shall be provided when a worker demonstrates lack of understanding, a change in the workplace, job assignment or operating procedures occur or known hazards are added. This training meets all requirements for workers who will be involved with the task on a regular basis so long as the worker has previously received Qualification Training.

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3.7. **Orientation Training** is training for new or transferred personnel. It may consist of General Awareness, Qualification, Refresher, or a combination thereof.

#### 4. Responsibilities

4.1. Management is responsible for implementing, supporting, and enforcing the requirements of this policy in their locations.

4.2. HS Supervisor(s) will:

4.2.1. Assure that all new, transferred, and temporary employees have been through the Company Safety Orientation and have a complete knowledge of the expectations for their job function.

4.2.2. Identify all employees and temporary personnel with less than 180 days of service, or those employees they desire to return to a mentoring status for improvement in job and/or safety performance. Any SSE experiencing an OSHA Recordable injury during SSE Period will repeat the mentoring program or may be dismissed for poor performance.

4.2.3. Ensure that the SSE's work assignment is addressed in detail with the SSE prior to commencement of the initial work assignment.

4.2.4. Establish expectations by setting clear HSE goals and objectives and detailing responsibilities and performance measures.

4.2.5. Assign a Mentor to the SSE who has proper operations knowledge and skills, and who displays appropriate safety leadership and a dedicated work ethic.

4.2.6. Conduct an SSE Performance Review with the SSE at a minimum of three (3) month intervals (based on initial hire date).

4.2.7. Conduct an additional SSE Performance Review upon the advancement from SSE status, should the person be advanced at an accelerated rate from the scheduled reviews.

4.2.8. Document progress-to-date and areas for concern or needing improvement.

4.2.9. Provide additional counselling to the SSE in areas where improvement is indicated.

4.2.10. Ensure that a Job Safety Analysis (JSA) is utilized as a training tool for the SSE.

4.2.11. Model positive HSE behaviors by leading with personal examples and by reinforcing and rewarding SSEs who exemplify positive behaviors.

4.2.12. Consistently and routinely engage in clear, two-way communication with all personnel on HSE issues.

4.3. Mentor(s) will:

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- 4.3.1. Set the proper safety example for any SSE assigned to them. Instructing proper safety to assigned SSEs through demonstration of observation skills.
- 4.3.2. Instruct and coach the SSE in their roles and responsibilities and safe work practices for all assigned duties by reviewing the known potential hazards for the work to be performed.
- 4.3.3. Display a positive work ethic and lead by example always regarding HSE performance.
- 4.3.4. Review with the SSE the purpose of the JSA and assist with their completion.
- 4.3.5. When applicable, observe the SSE during tasks performed and provide adequate feedback.
- 4.3.6. Provide prior approval for any new task initiated by the SSE.
- 4.3.7. Be knowledgeable of applicable Company HSE policies, standards, and procedures.
- 4.3.8. Converse daily with those persons assigned to them, preferably at the start of the day. This will be in addition to other tailgate or daily safety meetings held in the work area.
- 4.3.9. Participate in periodic performance reviews with Management / Supervisors and the SSE.
- 4.4. SSE(s) will:
  - 4.4.1. Attend Orientation Training prior to initial assignment, prior to performing any work and prior to driving a Company vehicle.
  - 4.4.2. Learn designated roles and responsibilities and adhere to all HSE policies, standards, and procedures.
  - 4.4.3. Actively participate in and review the JSA before engaging in any job task.
  - 4.4.4. Actively participate in identifying hazards throughout the workplace.
  - 4.4.5. Seek assistance and guidance from the Mentor, Manager and/or Supervisor when uncertain about any part of any job or task.
  - 4.4.6. Ensure SSE identification is always worn. (Uniquely colored hardhats, safety vest or other type of identifier.)
  - 4.4.7. Understand and clarify any concerns that arise during SSE performance reviews.
- 4.5. Sub-Contractor(s) will;
  - 4.5.1. Adhere to the requirements of the SSE program. Any sub-contractor employee reporting to work must document his or her experience within their company for the work they are performing.

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## 5. Procedure

- 5.1. A Short Service Employee (SSE) shall not work alone. An employee is considered an SSE when;
  - 5.1.1. The individual has been employed for less than six (6) months and has experience in the same job type with the Company, the employee shall be considered an SSE for a minimum of 1 month to a maximum of 6 months based on SSE performance reviews.
  - 5.1.2. If an individual new to the Company has less than 6 months experience with the general job task and duties, they shall be considered an SSE for a minimum of 2 months to a maximum of 6 months based on SSE performance reviews.
  - 5.1.3. If an individual new to the Company has less than 12 months' experience within the industry, they shall be considered an SSE for a minimum of 6 months to a maximum of 12 months based on SSE performance reviews.
- 5.2. A single person crew shall not be an SSE.
- 5.3. Crew sizes of less than five (5) shall have no more than one (1) SSE.
- 5.4. SSEs must wear uniquely colored hardhats or any another type of SSE designation at all times until they have successfully completed the SSE period. An SSE who fails to wear the assigned SSE designation shall be subject to disciplinary action.
- 5.5. SSEs shall be monitored for compliance with health, safety, and environmental policies and procedures. Once the SSE has demonstrated competency and compliance with HSE policies and procedures, with management approval, the employee shall be removed from SSE status. A documented checklist shall be utilized.
- 5.6. SSEs shall participate in periodic performance reviews with their appropriate Manager / Supervisor, Mentor and HSE Department. Such reviews shall be conducted at a minimum of 3-month intervals or more frequently as required.
- 5.7. The employee may be removed from the SSE program if the SSE has worked safely, adhered to HSE policies, and has no recordable incident during the SSE period. The Company shall require any employee that does not complete the SSE period recordable free to get Company approval in writing prior to returning to Company property.
- 5.8. Managers and the Safety Department will randomly audit for process compliance. This will involve interviewing employees in the SSE program (documentation is not required).
- 5.9. Prior to the job mobilization, the Company will notify the host facility when an SSE will be working at their site. The project coordinator, contractor contact, or on-site supervisor will determine the approval status of the crew makeup.

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## 6. Training

- 6.1. New personnel who have responsibility for operations or maintenance of the Company or client-owned equipment, or who drive a Company vehicle as a primary job responsibility shall, as a minimum, complete SSE training prior to commencing the job tasks for which they were hired.
- 6.2. General Awareness Training shall provide the SSE with a basic knowledge of a particular task and enable the SSE to identify related hazards. This training shall not be sufficient for SSEs who will be involved with the specific task on a regular basis. General Awareness Training shall be conducted:
  - 6.2.1. Initially during new employee orientation.
  - 6.2.2. As necessary when changes are made to the training program.
  - 6.2.3. When disciplinary actions are enforced due to the actions of an employee.
- 6.3. Qualification Training shall be provided to the SSE with full knowledge of the specific task and enable the SSE to identify related hazards. This training shall meet all requirements for SSEs who will be involved with the specific task on a regular basis.
- 6.4. Refresher Training shall focus on reviewing and refreshing the SSEs knowledge on the specific task. This training shall focus on pertinent details of the task. This training shall be provided when a worker demonstrates lack of understanding, a change in the workplace, job assignment or operating procedures occur or known hazards are added. This training shall meet all requirements for SSEs who will be involved with the specific task on a regular basis so long as the SSE has received prior Qualification Training.
- 6.5. Mentors shall be trained in or demonstrate their ability in:
  - 6.5.1. Creating awareness of HSE standards.
  - 6.5.2. Instructing and coaching SSE personnel in their roles and responsibilities in HSE.
  - 6.5.3. Participating in HSE performance reviews.
  - 6.5.4. Providing instruction in the use and care of Personal Protective Equipment (PPE).
- 6.6. Management involved in the reviewing process shall receive initial training.
- 6.7. Training Frequency
  - 6.7.1. Orientation Training shall be provided at orientation to the SSE and is a one-time occurrence.
  - 6.7.2. Training shall be provided prior to the SSE beginning the assignment or being exposed to the hazard.
  - 6.7.3. Refresher Training shall be provided on an annual basis.

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**7. Appendix**

- 7.1. Short Service Employee Notification Form
- 7.2. Short Service Employee Checklist
- 7.3. Job Safety Analysis (JSA) Form

**8. Reference**

- 8.1. OSHA – Protecting Temporary Workers

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**Brunel Energy, Inc. SHORT SERVICE EMPLOYEE NOTIFICATION FORM**

**Short Service Employee Information (Completed by Management)**

|                                |              |
|--------------------------------|--------------|
| Employee Name (Print)          |              |
| 1 Employee Hire Date           | Change Date: |
| 2 Current Job Title            |              |
| 3 Time in Present Position     |              |
| 4 Years of Oilfield Experience |              |
| 5 Types of Oilfield Experience |              |

**SSE Mentor Information (Completed by Management)**

|                              |  |
|------------------------------|--|
| Employee Name (Print)        |  |
| Employee Hire Date           |  |
| Current Job Title            |  |
| Time in Present Position     |  |
| Years of Oilfield Experience |  |
| Types of Oilfield Experience |  |

**Send to Supervisor & Retain in Employee's File**

|                                                                                           |     |  |    |  |
|-------------------------------------------------------------------------------------------|-----|--|----|--|
| Employee has received the required Safety Orientation                                     | Yes |  | No |  |
| Employee has received all required Safety Training *                                      | Yes |  | No |  |
| Employee has received the required safety training except (Attach list of any exceptions) | Yes |  | No |  |

**Supervisor Sign-Off (Approval for Removal From SSE)**

|             |           |              |                        |
|-------------|-----------|--------------|------------------------|
| Print Name: | Signature | Today's Date | Date Removed From SSE: |
|             |           |              |                        |

\* Safety training shall be determined and conducted by individual company policies and procedures, in compliance with all regulatory requirements

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**Brunel Energy, Inc. SHORT SERVICE EMPLOYEE CHECK LIST**

| Mentor's Initials as Completed | SSE Initials as Completed | <b>Short Service Employee sets clear expectations and consequences for safe behaviors.</b> |
|--------------------------------|---------------------------|--------------------------------------------------------------------------------------------|
|                                |                           | Does not take unnecessary risks.                                                           |
|                                |                           | Asks for help when needed.                                                                 |
|                                |                           | Does not try to lift or handle too heavy of a load. Gets mechanical help when needed.      |
|                                |                           | Raises awareness of possible hazards.                                                      |
|                                |                           | Intervenes with unsafe behaviors.                                                          |
|                                |                           | Understands his/her "stop work" authority and responsibility                               |
|                                |                           | <b>Short Service Employee demonstrates ability to do job required:</b>                     |
|                                |                           | Works in a craftsman-like manner.                                                          |
|                                |                           | Has clear understanding of job to be done.                                                 |
|                                |                           | <b>The new employee can use tools safely by:</b>                                           |
|                                |                           | Communicating                                                                              |
|                                |                           | Demonstrating                                                                              |
|                                |                           | Observing                                                                                  |
|                                |                           | <b>New Employee is able to identify the following at the work site:</b>                    |
|                                |                           | Struck by hazards                                                                          |
|                                |                           | Crushed by hazards                                                                         |
|                                |                           | Burns and scalds                                                                           |
|                                |                           | Sharp objects and precautions                                                              |
|                                |                           | Trip hazards and precautions                                                               |
|                                |                           | Electrical hazards and precautions                                                         |
|                                |                           | Fall hazards and precautions                                                               |
|                                |                           | Hot and / or cold surfaces, piping, and equipment                                          |
|                                |                           | Chemical hazards and precautions                                                           |
|                                |                           | Emergency procedures                                                                       |
|                                |                           | Emergency communications                                                                   |
|                                |                           | Respiratory hazards and precautions                                                        |
|                                |                           | Toxic substance hazards and precautions (ex. Bromide)                                      |
|                                |                           | Any additional hazards specific to the job site                                            |
|                                |                           | <b>Short Service Employee exhibits compliance to:</b>                                      |
|                                |                           | General safety rules and policies                                                          |
|                                |                           | Safety rules and policies specific to the job being performed                              |
|                                |                           | Housekeeping policies                                                                      |
|                                |                           | PPE requirements                                                                           |

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|  |  |                                                                         |
|--|--|-------------------------------------------------------------------------|
|  |  | <b>Short Service Employee shows competency on following procedures:</b> |
|  |  | a. Fusing/Laying Procedures                                             |
|  |  | b. Ditching/Backfilling                                                 |
|  |  | c. Hydro-vac                                                            |
|  |  | d. Layout Poly Trailers                                                 |
|  |  | e. Spool Up Poly Trailers                                               |
|  |  | f. Banding Trailers                                                     |
|  |  | g. Loading/Unloading Poly Pipe                                          |
|  |  | h. Pigging                                                              |
|  |  | <b>Certifications:</b>                                                  |
|  |  | SafeLand                                                                |
|  |  | Forklift                                                                |
|  |  | Manlift                                                                 |
|  |  | Backhoe                                                                 |
|  |  | Hot work                                                                |
|  |  | Confined Space                                                          |
|  |  | CPR/First Aid                                                           |
|  |  | H2S Awareness                                                           |
|  |  | <b>Other:</b>                                                           |

|                                                                           |                      |                       |
|---------------------------------------------------------------------------|----------------------|-----------------------|
| _____                                                                     | _____                | _____                 |
| Mentor                                                                    | New Employee         | New Hire Date         |
| Review Dates: 30-day review _____ 60-day review _____ 90-day review _____ |                      |                       |
| 120-day review _____ 150-day review _____ 180-day review _____            |                      |                       |
| _____                                                                     | _____                | _____                 |
| Supervisor Approval for Removal from SSE                                  | Supervisor Signature | Date Removed From SSE |

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### Brunel Energy, Inc. JOB SAFETY ANALYSIS

| JOB/TASK NAME:                              |                 | PAGE OF           | DATE:                                    | <input type="checkbox"/> NEW<br><input type="checkbox"/> REVISED |
|---------------------------------------------|-----------------|-------------------|------------------------------------------|------------------------------------------------------------------|
| EMPLOYEE(S)/POSITION(S) PERFORMING THE JOB: |                 | SUPERVISOR(S):    | ANALYSIS BY:                             |                                                                  |
| COMPANY NAME:                               | PLANT/LOCATION: | DEPARTMENT(S):    | REVIEWED BY:                             |                                                                  |
| PERSONAL PROTECTIVE EQUIPMENT:              |                 | SHIFT:            | APPROVED BY:                             |                                                                  |
| JOB STEPS                                   |                 | POTENTIAL HAZARDS | ACTION/PROCEDURE TO CONTROL OR ELIMINATE |                                                                  |
| 1                                           |                 |                   |                                          |                                                                  |
| 2                                           |                 |                   |                                          |                                                                  |
| 3                                           |                 |                   |                                          |                                                                  |
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| 15                                          |                 |                   |                                          |                                                                  |
| 16                                          |                 |                   |                                          |                                                                  |

|                           |
|---------------------------|
| EMPLOYEE SIGNATURE: _____ |
|---------------------------|