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Brunel Energy, Inc.

Subcontractor Management

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1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a program to set the requirements for selection, use and management of subcontractors and subcontractor equipment.

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. **Subcontractor** is an individual or a business that signs a contract to perform part or all the obligations of another's contract. A subcontractor is a company or person whom a general contractor hires to perform a specific task as part of an overall project and normally pays for services provided to the project.

4. Responsibilities

- 4.1. Manager(s):
 - 4.1.1. Shall implement, support, and enforce the requirements of this policy in their area of responsibility.
- 4.2. HSE Supervisor(s):
 - 4.2.1. Shall assist management in the implementation of this policy.

5. Procedure

- 5.1. Subcontractors
 - 5.1.1. Management shall develop a subcontractor Health, Safety and Environmental (HSE) program that addresses the following criteria:
 - 5.1.1.1. Listing of low-risk subcontractor categories that are exempt from the program.

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- 5.1.1.2. Emergency subcontractor use exemption procedure.
- 5.1.1.3. Pre-qualification review shall include safety programs, safety training documents and safety statistics.
- 5.1.1.4. Pre-qualification using industry accepted safety metrics, such as TRIR, EMR, DART, Fatality Rate
- 5.1.1.5. Minimum HSE documents to be provided by subcontractor.
- 5.1.1.6. Minimum HSE requirements for subcontractors reporting to the site.
- 5.1.1.7. Minimum requirements for on-site briefing and information exchange.
- 5.1.1.8. Minimum requirements for overseeing the on-site subcontractor.
- 5.1.1.9. Conducting post-job performance review of the subcontractor.
- 5.1.2. The program shall identify that subcontractors will be included in tailgate safety meetings, regular job safety inspections and participate in job safety analysis or job hazard analysis.
- 5.1.3. Subcontractors shall be included in pre-job safety orientations, pre-job meetings, kick off meetings and safety orientations.
- 5.1.4. Documentation and records retention.
- 5.1.5. Contractors shall maintain accountability for all subcontractors they hire.
- 5.1.6. The subcontractor shall supply all HSE-related equipment for the job, including Personal Protective Equipment.
- 5.1.7. Subcontractors must be competent and capable of performing their assigned duties in a safe and environmentally sound manner.
- 5.1.8. Subcontractors must have the appropriate licenses, registrations, and insurance to complete their job.
- 5.1.9. Prior to beginning work the contractor and subcontractor will establish clear lines of communication, roles, and responsibilities. This will also include establishing an emergency action plan.
- 5.1.10. An appropriate monitoring process shall be in place to verify subcontractor performance.
- 5.2. Subcontractor Equipment
 - 5.2.1. The Company employees shall not operate 3rd party equipment.
 - 5.2.2. The hiring Client shall advise the Company of all subcontractor plans to transport third party equipment to a worksite for temporary or permanent installation.
 - 5.2.3. The Company shall provide the subcontractor with the form "Permit for Installation of Third-Party Subcontractor Equipment" requesting them to review the equipment referring to Part One of form as a guide to compliance.

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5.2.4. Tools or equipment used down hole, or equipment that presents no risk to facility or personnel do not require an Installation Permit.

6. Recordkeeping

- 6.1. Equipment shall be shipped with any and all test or inspection certificates including Lifting Gear Certification if it is required to be positioned by crane.
- 6.2. Confirmation. The Manager/Department Head or his designee shall review the provided documentation and verify it conforms to the equipment received.
- 6.3. Inspection. The SM/FS or its designee shall appoint a Supervisor to survey the equipment for obvious external and internal damage and overall condition before use. Part One of Form: "Permit for Installation of Third Party & Subcontractor Equipment" shall then be completed.

7. Appendix

- 7.1. Third Party and Subcontractor Equipment

8. Reference

- 8.1. 1904.31 - Covered employees.

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Third Party and Subcontractor Equipment

Date:		Time:		<input type="checkbox"/>	AM	<input type="checkbox"/>	PM
Operator:		Location:					
Company:		Equipment:					
Applicant's Name:		Position:					
Purpose of Equipment							
Proposed Location:							
Anticipated Duration of Equipment at Facility:	< 1 Month	<input type="checkbox"/>	< 3 Months	<input type="checkbox"/>	> 3 Months	<input type="checkbox"/>	
PART ONE – Application for Installation – ELECTRICAL CONDITION CHECKLIST							
Power is 110 V or 480 V. It is the responsibility of the contractor to supply appropriate transformers and cabling							
Wiring secured	<input type="checkbox"/>	Explosion proof fittings (if in Hazardous Zone)	<input type="checkbox"/>				
Purged	<input type="checkbox"/>	Industrial quality cables	<input type="checkbox"/>				
Weatherproof industrial plugs/sockets	<input type="checkbox"/>	Grounding wires as necessary	<input type="checkbox"/>				
Comments:							

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Third Party and Subcontractor Equipment (Continued)

MECHANICAL							
Weight		Dimensions		Maximum Output PSI/GPM			
APV	<input type="checkbox"/>	SWP	<input type="checkbox"/>	Relief Valve	<input type="checkbox"/>	Belt Guards	<input type="checkbox"/>
Fan Guard	<input type="checkbox"/>	Exhaust Insulated	<input type="checkbox"/>	Spark Arrestor	<input type="checkbox"/>	Gauges Good	<input type="checkbox"/>
Drive Shaft Guard			<input type="checkbox"/>	Air-Acceptable Connections and Safe Ties			<input type="checkbox"/>
Hazardous Area Certificate			<input type="checkbox"/>				<input type="checkbox"/>
Comments:							
SAFETY							
Hazardous Materials:							
Radioactive	<input type="checkbox"/>	Corrosive	<input type="checkbox"/>	Flammable	<input type="checkbox"/>		
Toxic	<input type="checkbox"/>	Explosive	<input type="checkbox"/>	Other	<input type="checkbox"/>		
Fire Extinguisher	<input type="checkbox"/>	Slings	<input type="checkbox"/>	Manned Places – Alarm Bell Req'd	<input type="checkbox"/>		
Fire/Gas Detector	<input type="checkbox"/>	Test Certificates	<input type="checkbox"/>	Telephone/PA Required	<input type="checkbox"/>		
Emergency Access/Egress	<input type="checkbox"/>	SWL and Color Code	<input type="checkbox"/>	Handrails Good	<input type="checkbox"/>		
Stairs Good	<input type="checkbox"/>	Kick Boards	<input type="checkbox"/>	Other	<input type="checkbox"/>		
Comments:							
Company Representative:							
Name:		Position:		Signature:			
Manager:							
Name:		Position:		Signature:			

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Third Party and Subcontractor Equipment (Continued)

PART TWO – Approval for Installation of Equipment					
Approval for installation of the above listed equipment is hereby granted.					
Company Representative:					
Company Representative:					
Name:		Position:		Signature:	
Manager:					
Name:		Position:		Signature:	
PART THREE – Approval for Removal of Equipment					
Assistance Required:					
Mechanic	<input type="checkbox"/>	Electrician	<input type="checkbox"/>	Forklift Operator	<input type="checkbox"/>
Other	<input type="checkbox"/>	If Other, Please Specify:			
Cabling Secured	<input type="checkbox"/>	Piping Disconnected	<input type="checkbox"/>	Trip/Slip Hazards Removed	<input type="checkbox"/>
Debris Removed	<input type="checkbox"/>	Site Safe	<input type="checkbox"/>	Crane Operator	<input type="checkbox"/>
Comments:					
Company Representative:					
Name:		Position:		Signature:	
Manager:					
Name:		Position:		Signature:	
Instructions:					
Please complete this form by checking appropriate boxes and supplying requested information. Provide this form to the Manager upon arrival of the equipment. The intention of this permit is to ensure the integrity of operations and safety of personnel. Your efforts in ensuring that equipment complies with the requirements before it arrives will facilitate speedy installation.					