ONEOK Construction Project's Contractor ESH Expectations

This guideline is to establish Safety and Health (S&H) expectations in furtherance of ONEOK's pursuit of a zero-incident culture by continuously working towards mitigating risk and eliminating incidents on ONEOK premises and construction projects that may bring harm to its employees, Contractors, the public and the environment.

Building and maintaining our assets utilizing both Contractors and employees requires clear communication between all parties regarding ESH expectations. ONEOK strives to engage qualified, responsible Contractors to help us execute our projects. Per the terms of our Contractor agreements, all Contractor work operations are required to be compliant with all applicable ESH laws and regulations and to satisfy the following expectations set forth in this guideline.

Contractors, Contractor Representatives, and/or Company Representatives (as defined below) shall comply at all times with all applicable federal, state and/or local laws, statutes and/or regulatory requirements, including, but not limited to those imposed and/or enforced by the United States Occupational Safety and Health Administration (OSHA), United States Department of Transportation (DOT), Pipeline and Hazardous Materials Safety Administration (PHMSA), United States Environmental Protection Agency (EPA), Federal Energy Regulatory Commission (FERC), Bureau of Land Management (BLM), United States Army Corps of Engineers (USACE), United States Forest Services (FS), and the United States Fish and Wildlife Service (FWS).

Required Contractor Work Practices

- Before a bid is awarded to a Contractor, the Contractor's S&H programs must be evaluated and approved by ISNetworld for compliance and adequacy against ONEOK's S&H expectations. ONEOK expects all Contractors and hired sub-contractors to abide strictly by the Contractor's ISNetworld-approved S&H programs and associated work practices. Required Contractor S&H Programs and/or processes shall include, but are not limited to the following, as applicable to the scope of work:

Abrasive blasting	Equipment inspection	Ladder safety
Bloodborne pathogens	Fire protection/portable fire extinguishers	Lockout-tagout
Confined space entry	First-aid/CPR	Personal protective equipment (PPE)
Crane and lifting equipment operations	Fall protection	Respiratory protection
Discipline	Hand and power tools	Rigging and material handling
Drug & alcohol	Hazard communication	Scaffolds
Excavation – trenching & shoring	Hearing conservation	Traffic control and flagging (Comply with MUTCD on public road ways)
Excavation - competent person training	Heavy equipment operation	Underground and overhead power line safety
Electrical safety	Heavy equipment maintenance program	Welding, cutting, and hot work

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- When portions of project activities take place on or near existing ONEOK operating assets, the Contractor shall observe the ONEOK S&H program such as work permitting, excavation, process safety management (PSM), as applicable. The ONEOK project manager or designee will coordinate with the specific ONEOK business unit personnel to identify the applicable ESH program or processes and communicate them to the Contractor during the bidding and/or pre-work process.
- Safety and Health Absolutes (listed below) highlight specific areas of S&H work practice requirements that must be followed when working on ONEOK premises, projects and/or assets.
    - Anyone can stop unsafe work. All Company and Contractor personnel have stop work authority.
    - A competent person for excavations will inspect all excavations (greater than four (4) feet deep) to be occupied that day, after each rain, and if conditions change. Inspections must be documented, and the documentation must be maintained on-site or for a minimum of 15 days.
    - Working at heights above 6 feet cannot proceed until a fixed platform has been verified by a competent person or fall arrest/fall restraint equipment is used.
    - All portable grinders, including wire wheels, must be operated in accordance with manufacturer specifications and the user's manual. This includes such items as, but not limited to, a 180-degree guard, handles/grips, etc.
    - Seats are required for all occupants of vehicles and equipment. All occupants must wear a seat belt on vehicles and equipment with roll over protection structures (ROPS). No riding on any portion of vehicles or equipment other than a seat is allowed (i.e., no riding on fenders, track guards, flatbeds, trailers, etc.).
    - Hard hats are required on all project sites (except while welding and in a vehicle).
    - Safety glasses with side shields are required on all project sites.
    - Face shield and safety glasses are required for all grinding, buffing or potential stored energy activities. (e.g. high-pressure air, water, or gas activities)
    - Welding helmets and cutting goggles with recommended shade are required any time welding or cutting is taking place. (Note: Safety glasses are not cutting goggles)
    - Flame Resistant Clothing (FRC) must be worn and FRC requirements must be followed when working in areas requiring FRC. Areas requiring FRC must be identified prior to work activities being performed. All individuals entering FRC areas will wear the required FRC.
    - Nonconductive tag lines are required for lifting equipment, pipe, and supplies.
    - Suspended loads shall not be left unattended or under stress. Never stand under a suspended load.
    - Equipment and vehicles shall not be left running unless the operator is within 35 feet and in line of sight unless a plan is developed to maintain safety and security of the project. The equipment must be secured from unintentional movement if the operator is not in the operator's seat. Unattended equipment/vehicles shall not be left running.
    - Hoses shall be properly secured to prevent whipping in the event of failure.
    - Sitting, walking or standing on top of the pipe is prohibited.
    - The use of telephones headphones and other electronic devices are prohibited while operating equipment (e.g. crane, backhoe, track hoe, truck, dozer, trencher, vehicles, etc.).
    - Mobile operating equipment must have audible alarms installed and maintained.
    - Safety latches shall be installed and unaltered on all lifting and lowering tasks.
    - Equipment or vehicles shall not be fueled on public roadways.
    - Firearms, alcoholic beverages and illegal drugs are strictly prohibited.
    - Dogs and other pets are prohibited on the project site. (No animals, except for service animals, are allowed on Company premises. Contractor shall provide a Service Animal Mitigation Plan or equivalent document to ONEOK for review and acknowledgement by Legal, Safety and Health, Human Resources and ONEOK leadership for all service, emotional support, comfort, therapy animals and similar whether registered or under a physician note or prescriptions).

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- All overhead power line barricades must always be installed and maintained.
- Right-of-way speed and/or boundaries shall not be exceeded.
- Rough physical contact, fighting, horseplay, and practical jokes are prohibited on Company premises and project sites.
- All incidents must be reported. Incidents include any injury, near miss, significant events, property damage, spills and/or releases.
- Equipment spotters must be utilized to reduce the risk of an incident in congested areas, tight areas, inclement weather, adverse road conditions and areas with overhead power lines.
- All flaggers must be trained or certified based on applicable federal, state, and local county and/or city requirements.
- Portable sanitation facilities should be adequate, readily accessible and properly secure. A service schedule should be implemented for servicing, cleaning and supplying each facility and ensure it is maintained in a clean, sanitary, and serviceable condition.

- The following Environmental Best Management Practices highlight some of the areas of specific environmental work practice requirements. These practices are the "minimums" which must be implemented on every project to mitigate environmental risks associated with project activities:
  - Confine all project activities to the designated, approved work areas.
  - Store and dispense all hazardous and petroleum products at least 100 feet from wetland and water bodies boundaries, and 150 feet from wells.
  - Frequently inspect tanks, containment and equipment for leaks and deterioration. Leaking tanks, containment and equipment must be immediately repaired or removed from the work site. Maintain spill kits in readily accessible location(s) as appropriate for each project site.
  - In the event of a spill or release, immediately stop the source and contain the extent of the spill or release, doing so in a manner that considers personal and public safety. Immediately report all spills as defined in Section 4.5, Incident Reporting and Investigation.
  - Equipment must be clean and free of tracked and trapped materials including soils and vegetation prior to entering each new project site.
  - Where possible, minimize clearing and grading to the area needed for safe pipeline installation and repair activities. Segregate and preserve topsoil as required by project permit conditions or landowner requirement.
  - Install and maintain sediment and erosion control measures prior to or immediately after ground disturbance to prevent discharges to wetlands, water bodies and drainage channels. As applicable, continue to maintain controls until disturbed areas are stabilized.
  - Maintain clean and safe conditions at all public roads (e.g. removed tracked mud, vehicle parking, equipment crossing, etc.)
  - Where applicable, utilize construction mats to minimize rutting and soil-mixing in wetlands.
  - Direct water discharges to well-vegetated upland areas, if available, or discharge to geotextile filter bags, straw bale dewatering structures, or equivalent energy dispersion and sediment retention devices in accordance with applicable permits and/or approvals. Keep hose inlets off the trench bottom.
  - As applicable, restore disturbed areas as soon as possible upon completion of project activity. Respread segregated topsoil during final grading.
  - All waste must be properly contained, collected, transported and disposed.
  - If any historical or cultural resources (e.g., arrow points, artifacts, bones or human remains) are uncovered during project, immediately suspend all activity in the area and establish a minimum 100 foot buffer to isolate the area from further disturbance. Immediately notify the appropriate project personnel of the discovery, including the ONEOK Environment Project Manager in order to receive

further instruction. Following notification, project activity may resume outside the 100 foot (or greater as necessary) buffer around the discovery.
    - If project activity encounters or potentially impacts any species protected under an applicable environmental law, such as the Endangered Species Act or Migratory Bird Treaty Act, immediately suspend project activity in the area and contact appropriate project personnel, including the ONEOK environment project manager.

- Remedial Action
    - If any Contractor requests or allows workers to work in or around unsafe conditions, or violates environmental plans, permits or regulations, the Company may remove the Contractor or any of its individual workers from Company premises. Immediate and permanent removal may occur if any of the following activities are observed:
        - Openly exhibits disregard, defiance, or disrespect for ONEOK's ESH program;
        - Falsifies documents or information;
        - Participates in threats of violence, theft or destruction of property; or
        - Violates established ESH laws, safety or environmental rules and regulations.

PROJECT MEETINGS

- Project kick-off meeting – ONEOK should schedule a project kick-off meeting before the execution of a field-based task associated with the construction of an asset. Field-based tasks could include, for example: Right of way staking, environmental surveys, right of way clearing, grading, trenching, pipeline/plant construction. Attendees shall include Contractor Management representatives, ESH representatives and ONEOK project personnel.
    - Meeting agenda should include:
        - ONEOK Operating Commitment & Key Drivers
        - Project Overview
        - ONEOK's ESH requirements and work expectations
        - Safety and Health Absolutes
        - Environmental Management Best Practices
        - Project specific permit conditions and plans (examples include, but are not limited to: Contractor Safety and Health Management Plan, Air Permit Approvals, Spill Preventions Containment and Countermeasure Plan (SPCC), Storm Water Pollution Prevention Plan (SWPPP), Emergency Plan, Environmentally Sensitive Area Plans, Endangered Species and/or Migratory Bird Act Mitigation Plans)
        - Contractor's Briefing (i.e., Plans for Contractors who were not able to attend the meetings);
        - Incident Reporting and Investigation Requirements (including communication methods and expectations); and
        - Contractor should provide an overview of their S&H programs and processes to meet ONEOK expectations.
- Routine follow-up meetings – Routine follow up meetings should be scheduled to review project scope changes and new conditions. Attendees should include Contractor Management representatives, ESH representatives and key personnel.
    - The agenda may include:
        - ESH performance and KPIs;
        - Overall project performance;
        - Lessons learned; and
        - Project improvement ideas

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ESH Orientation

- All Contractor personnel are required to have received ESH training pertinent to the tasks they will perform on the project as reflected in the Contractor's written ESH program. Documentation reflecting the successful completion of ESH training must be produced upon request by ONEOK prior to and/or during the project.
- ESH orientation is required for all personnel (Contractors, ONEOK employees, visitors, or observers) who will access or perform work on the project site. The ESH orientation (including PSM Contractor orientation when applicable) shall be received prior to starting any work and should be documented and evidenced by date and personnel signatures.
- Upon successful completion of the ESH orientation, personnel shall be issued a hard hat sticker, identification card or similar documentation that signifies the successful completion of the ESH orientation.
- Personnel who do not have the documentation which signifies the successful completion of the ESH orientation shall be required to receive immediate orientation or be required to leave the project site immediately.
- Project ESH orientation should consist of a thorough review of this guideline, ONEOK's expectations, project-specific ESH risks, hazard communication information, safety data sheets (SDS) locations, Environmental Best Management Practices and Safety and Health Absolutes as applicable.
- Project ESH orientation session(s) will address specific issues, permit conditions on an as-needed basis, or to satisfy an agency requirement to hold a pre-construction meeting for the purpose of notification, review or training.
- Project Contractors shall be responsible for translating all ESH material to language that is understood by their personnel and subcontractors.
- All project Contractor personnel should participate (attend, listen, remain present) in ESH meetings conducted by the Contractor at least weekly. Additional ESH meetings shall be scheduled as appropriate by the Contractor. ESH meeting documents should include:
    - Meeting date/time;
    - Name of person conducting meeting;
    - Topics discussed; and
    - Attendees' signatures/names
- Topics which may be presented and discussed in ESH meetings include:
    - ESH commitment;
    - ESH safety hazards/environmental conditions;
    - Permits present on or in effect for the project;
    - Review of recent job site ESH incidents and corrective actions;
    - Review of relevant ESH alerts/bulletins from other projects or activities; and
    - Attendee question and answer period

Incident Reporting and Investigation

- The Contractor shall be responsible for reporting and investigating all incidents pertaining to the project work it is performing. All project related incidents involving worker injury, environmental issues, property damages, third party, or significant contractor equipment damages shall be reported immediately to appropriate personnel as designated during the kick-off meeting.
- A report must be made in ONEOK's identified electronic incident management system containing the items listed below. The report is due to the designated ONEOK representative(s) and other appropriate project personnel as instructed during the kick-off meeting and ESH orientation within 24 hours and potentially earlier if required agency notifications are to be made in the prescribed regulatory timeframe.

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- All reportable incidents shall be investigated by the Contractor as soon as possible to identify potential causative factors and implement appropriate corrective actions. The results of Contractor's investigation should be shared with ONEOK representative(s) in a timely manner.
- Incident information to be included in a Contractor report includes:
  - Location and/or facility identifier;
  - Date and time of incident;
  - Individual(s), parties, Contractors and/or companies involved;
  - Person reporting the incident and any witnesses;
  - Supervisor/foremen of involved individual(s); and/or parties;
  - Type of incident (first aid, OSHA recordable, vehicle, property, release, spill, potentially non-compliant environmental issue, security, etc.);
  - Description of the incident (who, what, when, where and initial action taken). Include a list of applicable Contractor work and safety procedures, and any JSA and work permits for the task or activity that was taking place at the time of the incident
  - Details related to offsite response or emergency services;
  - Recommended action(s) to prevent recurrence of a similar event; and
  - Causal factors to the extent they are readily verifiable: (Facts only, no speculation or unconfirmed reporting of facts.)

Stop Work Authority

- All Contractors and/or Company Representatives have the authority and are required to suspend project activities, a work task or group operation when the control of safety or environmental risk is not clearly established or understood. If unsafe acts or conditions are identified the work must be stopped and corrected.

Construction Hazard Analysis

- The Contractor, working with ONEOK may be required to develop a project specific construction hazard analysis (CHA). If required, the CHA should outline recognizable hazards for the project by the Contractor. A hazard evaluation must be conducted to identify hazards anticipated during the project and the measures that will be implemented to eliminate or control the hazards.

Severe Weather

- Lightning within six (6) miles or greater if the contractor's program is more stringent than an operating facility or project site should be cause for immediate work stoppage for all outdoor operations until there is no lightening for thirty (30) minutes. Lightning detection systems, national weather service information or an equivalent alternative should be used as a formal means of determining proximity of lightning to the site or facility.
- At or above the threshold, all exposed lifting and crane operations and any elevated work shall be ceased until further evaluation. It is recommended that Contractors adhere to a wind speed limit of thirty (30) mph sustained (average observed values over a two (2) minute period0, or thirty-five (35) mph gust or the lesser of any manufacture listed recommendation or operating limit.
- During high wind events, risk mitigation measures should be implemented for material handling, working at heights or any other recognizable hazards.

Working in Low Light Conditions

- Work after dusk should not be permitted unless the following conditions are met:
  - Prior approval shall be obtained by a ONEOK representative or site inspector;

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- A minimum of two (2) workers or communications exist at outside areas to request assistance if required; and
- Adequate lighting is provided to illuminate the workspace

ESH Performance Report

- The Contractor shall enter the following information into ONEOK's identified electronic incident management system on a weekly basis:
  - Any updates to previously reported worker occupational injuries, illnesses, first aids, vehicle incidents, environmental spills or releases, or property damage that occurred on the project;
  - OSHA days away, restricted, transferred (DART) and lost time days;
  - Hours worked;
  - OSHA recordable incident rate (project-to-date);
  - First-aid case incident rate (project-to-date)
  - Vehicle miles driven;
  - Vehicle preventable rate and American National Standard Institute (ANSI) recordable rate;
  - Significant near misses;
  - A short description of any external regulatory inspections that occurred on the project; and
  - Any "event" deficiencies found as the result of ESH job site inspections performed by either the Contractor, or ONEOK personnel and the status of any outstanding corrective actions;
  - All spills and releases (immediately)

Job Site Inspections

- Contractors shall perform periodic inspections of each work area to verify compliance with the ESH program and/or regulatory requirements. Deficiencies found will be recorded and communicated to the appropriate Contractor and ONEOK personnel for corrective action. All Contractor weekly ESH inspection checklists along with associated corrective action documentation will be stored on site and subject to review by ONEOK personnel as warranted.
- Project safety and health professionals representing ONEOK may perform periodic quality assurance inspections of project site Contractor ESH work practices.
- Project environmental professionals representing ONEOK may perform periodic environmental compliance inspections of the project site, on a project specific basis, as determined internally by ONEOK ESH and regulatory requirements.

Construction Projects Protest Mitigation Expectation

- If community or opposition groups approach the construction project, the following guidance is to be followed by all ONEOK personnel and contractors.

  Do:
  - Remain calm and observant of the situation developments.
  - Communicate the event occurrence and details of the opposition to the appropriate chain of command.
  - Assume that all radio communications can be monitored by opposition groups/protestors.
  - Ask the opposition group's name and affiliation.
  - Let the protestors know that you cannot speak on behalf of the company and that communication will be coordinated with a company representative.
  - If the opposition/protestors trespass onto the property, politely alert them that they are trespassing and ask them to vacate the property.

- Always maintain a safe distance from opposition groups/protestors. Keep physical barriers between you when possible.
- If they persist to trespass, notify the local law enforcement and update the appropriate chain of command.
- In the event of hostile or unsafe action from protestors, stop work and safely secure equipment until the situation is resolved and it is safe to resume work.
- Anticipate that your words and actions could be recorded by opposition/protestors and shared via social media to be used against you and the company.
- Provide a written account of the incident to your supervisor.
- Relay the incident in the safety tailgate meeting.

Do not:

- Do not engage with the opposition/protestors; continue working despite the distraction.
- Do not speak on behalf of the project or ONEOK. This includes, but is not limited to:
  - Providing company information
  - Providing project-specific details
- If the opposing/protesting individuals harass work personnel, do not respond or retaliate.
- Do not allow opposition/protestors to coax you off the right of way, or ONEOK property.
- Do not physically remove trespassing individuals. Rely on local law enforcement or ONEOK security representatives to correct the situation.

Fire Suppression Plan

- The Fire Prevention and Suppression Plan (Fire Plan) identifies measures to be taken by the Contractor to prevent and suppress all fires during construction projects in accordance with federal, state, and local regulations. Measures identified in this plan apply to work within the project area defined as the right-of-way, access roads, all work and storage areas, and other areas used during construction of the project. It is the Contractor's responsibility and obligation to take the initial and independent action to control and suppress all fires resulting from its operations regardless of the location or extent of such fires. Prior to construction, the Contractor will develop a project-specific fire control plan, to be submitted to ONEOK with the construction bid documents, that meets or exceeds the minimum requirements and details for fire control procedures, roles and responsibilities, and staffing.