If one word was to describe our overall attitude toward Environmental, Health and Safety – it's Commitment. This commitment is driven by EHS Support's Executive Management Team and extends to our employees, as well as those companies with which we conduct business. It is understood by all EHS Support personnel that the responsibility and accountability for health and safety rests with each and every individual.

Performing work safely and responsibly starts with our management systems, supporting standards and continues with the expertise and diligence of our employees and contractors worldwide. Each day, it is their integrity, attention to detail, and concern for the health and safety of personnel and the environment in which we live that enables us to provide consistent superior performance, quality services, cost competitiveness and customer satisfaction.

Protecting our employees, our clients, the public and the environment is held as a core value at EHS Support. There is no reason that we cannot go home from work without injury or illness. We firmly take the stance that no business objective will take priority over health and safety and no task is so important or urgent that it cannot be completed safely.

We have had an excellent track record over the years with no injuries. To keep that track record alive, we share an embedded focus on continually improving our management systems, standards and approach by developing a culture where we:

• Proactively identify potential risks and hazards and eliminate, or if not possible, mitigate the risk to as low as reasonably attainable;
• Implement the systems, strategies, resources and structures necessary to meet EHS goals;
• Review and measure our systems, standards and behaviors to implement corrective and preventative actions for continuous improvement; and
• Improve our performance and process, not because we have to, but because we want to.

At EHS Support we are committed – ethically, financially and personally – to a working environment where no one gets hurt and protecting the environment in which we work and live.
ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT SYSTEM (EHSMS)

RESPONSIBILITY AND TRAINING

The EHS Support Environmental Health and Safety Management System (EHSMS) is a management tool that integrates all EHS management components of our business into one coherent system. The integration of these components (Elements and Standards) allows EHS Support to achieve its objectives efficiently by managing its impact to the environment and minimizing and controlling occupational health and safety risks. The EHSMS provides the structure for implementing proactive sustainable business practices with the purpose to ensure compliance with internal and external requirements, drive continuous improvement, and support our strategy of becoming a leader in environmental, health and safety management.

ACCOUNTABILITY & RESPONSIBILITY

The Management Team has overall responsibility for:
• Establishing the EHS Policy;
• Setting objectives and targets for EHS performance and improvement;
• Assigning responsibility and authority for implementation activities;
• Providing the adequate resources needed to implement the policy;
• Ensuring knowledge and skills are developed to effectively apply the EHS systems and standards;
• Reviewing the EHS system to ensure its continuing suitability, adequacy, effectiveness; and
• Actively communicating leadership and commitment that is visible to the organization.

The Health and Safety Team is responsible for:
• Preparing and implementing EHS Management Systems that meet the requirements of the EHS Support EHS Standards;
• Reviewing EHS performance to ensure company objectives and expectations are met;
• Involving all employees in the relevant EHS plans for activities and services;
• Assessing the existence and effectiveness of EHS plans through appropriate audits and reviews;
• Effectively reviewing and tracking corrective actions for all incidents, defects, hazards, inadequacies of procedures and suggested improvements that are escalated; and
• Implementing leadership requirements specified in the EHS Management Standards.

Employees and Contractors are responsible for:
• Compliance with procedures that implement the requirements of the EHS Support EHS Standards;
• Being responsible for their own actions;
• Carrying out their work in a manner which does not present a risk to themselves, others and the environment;
• Reporting all incidents, defects, hazards and inadequacies of procedures so that appropriate review and corrective action can be taken;
• Suggesting improvements and being active in the general improvement of all systems and methods of work to ensure EHS Support's activities and services are carried out in a safe, environmentally responsible, reliable and cost effective manner.

All personnel and contractors are responsible for adhering to the EHS Support Stop Work Authority Policy.

COMPETENCE, AWARENESS & TRAINING

Training is essential for the successful implementation of our EHS Policy. All EHS Support personnel receive training appropriate to their functions and assignments. Training is also provided to subcontractor and other visitors to ensure their safety protection and adherence to our EHS Policy.

Training needs are identified based on such factors as new employee or activity, changes to regulations or other requirements, and the results of audits and measures of performance. Training is provided that meet the legal requirements as well as the needs of the organization, and records of the training are maintained.
EHS Management System Overview

EHS Support’s Environment, Health and Safety (EHS) Policy is implemented using EHS Support’s EHS Management System (Figure 1 on next page). The fourteen EHS Elements form the cornerstone of the management system by describing management’s expectations for activities and services. Each Element contains underlying Principles and a set of Expectations. The objectives of the Elements are to:

- Set and formalize expectations;
- Provide auditable criteria; and
- Provide a basis from which to drive continual improvement.

Implementation must include the following five characteristics of an effective management system:

1. **Policy Awareness** - The EHS Policy represents EHS Support’s commitment to EHS excellence, at all levels of the organization.
2. **Plan** - Planning is used to identify potential EHS risks from activities, products and services, and to evaluate the types of programs and goals to minimize those risks.
3. **Implementation and Operation** – This part of the management system defines the people, systems, strategies, resources and structures necessary to meet EHS goals.
4. **Review and Measure** – The Review and Measure portion is designed to monitor and record performance, and implement corrective and preventative actions for continuous improvement. The ongoing progress towards meeting the requirements of the EHS Management System is assessed by management.
5. **Improve** – Process integrated within the EHS Management System to ensure the correction of program deficiencies and the ongoing improvement of performance.

The Standards have been developed and grouped into hazard-based categories which are:

- Personal Safety
- Health and Hygiene
- Environmental

Standards are the minimum EHS requirements that employees and contractors have to comply with in order to meet the intent of company policy. They define what must be achieved, rather than how to achieve it. Procedures are the mandatory instructions that provide details on how to implement the Standards.

Figure 1: EHS Support’s EHS Management System
ELEMENTS OF THE HSE MANAGEMENT SYSTEM

ELEMENT 1 – MANAGEMENT LEADERSHIP, COMMITMENT & ACCOUNTABILITY

Management establishes policy, provides perspective, sets expectations and ensures provision of adequate resources for successful operations. Management leadership, commitment and action need to be visible to the organization. Clear accountabilities must be established at all levels. Fostering a safety culture that supports the goal of zero EHS incidents is critical to the success of EHS Support. By championing EHS activities and work processes and engaging personnel on EHS issues and concerns, management can promote a work environment where personnel identify, communicate and address unsafe acts, conditions and events.

ELEMENT 2 – RISK PLANNING, ASSESSMENT & MANAGEMENT

Risk planning, assessment and management is a continuous process that includes the formal and informal identification, evaluation and control of EHS business risks. These EHS risks include business liabilities, regulatory compliance and client requirements. Implementation of risk assessment methodologies can reduce environmental, health and safety risks and help mitigate adverse consequences, by providing important information for planning and decision-making.

Processes or procedures shall include provisions for communicating hazards to potentially affected personnel. In addition, assessed risks must be communicated to and addressed by specified levels of business unit supervision and management.

Risk assessments will be periodically updated based on audits, reviews and changing regulatory requirements. The assessment shall consider normal, abnormal and emergency operating conditions. Importantly, it will address related impacts to the business unit, its staff, facilities, contractors, customers, the general public, the environment and the surrounding community.

ELEMENT 3 - FACILITY/SITE AND EQUIPMENT/TOOL SAFETY MANAGEMENT

Safety can be enhanced and risk to health and the environment can be minimized by using effective standards, procedures and management systems for facility/site design, activities and services. Health and safety plans (HASP) will be used to summarize health and safety hazard information for field activities. The HASP will delineate procedures that will allow personnel to work safely and respond quickly and appropriately to site emergencies.

Criteria are established and procedures are put in place for conducting and documenting risk assessments at specific project stages to ensure that risks are identified understood and minimized.

Facility/site and equipment/tool safety practices and standards shall:
- Meet or exceed applicable regulatory requirements
- Embody responsible requirements where regulations do not exist
- Address other important considerations, including human factors.

Equipment or tools shall be utilized in accordance with manufacturer’s regulations. Deviation from approved practices and standards, or from the approved design, may be permitted only after review and approval by the appropriate authority.
ELEMENT 4 - EHS Regulatory Management, Information and Documentation

Accurate information about the configuration and capabilities of sites and facilities, properties of products and materials handled, potential hazards, and regulatory requirements is essential to assess and manage risk. All projects and services are to comply with EHS Support’s EHS Regulatory Compliance Procedures and in the case of Contractors, they shall have equivalent procedures equal to or exceeding EHS Support’s Procedures.

Each project must complete and maintain a Health and Safety Plan and Project Safety Analysis. Information on the potential hazards involved in field projects is kept current. The information will include:
- List of applicable EHS regulatory requirements;
- Interpretation of what actions need to be taken to comply;
- Timing/responsibility for each action; and
- Compliance verification monitoring.

Where local legislation does not require an adequate level EHS performance, activities are conducted in a manner that is consistent with EHS Support’s EHS Standards, relevant regulatory and international standards and practices, with consideration given to social, cultural and legal sensitivities and requirements.

Compliance with EHS regulatory and other requirements must be assessed periodically or when new or changed requirements have the potential to impact our ability to perform services. This periodic review must ensure that any changes in regulations, legislation or other requirements are captured in relevant EHS documentation and communicated to affected personnel.

ELEMENT 5 - EHS Planning & Procedures

Safety and health policies and programs will be established and maintained to manage significant risks and comply with legal requirements. They will be written, communicated and followed and be accessible to personnel, contractors, and government entities as appropriate.

All onsite activities are covered by a Health and Safety Plan (HASP). To ensure sound management of specific risks and hazards, a Project Safety Analysis (PSA) will be conducted and communicated to all project parties.

Contractors are responsible for compliance with the requirements of this Element through application of their Management System and/or use of EHS Support’s EHS Management System.

ELEMENT 6 - Personnel, Organization, Competence and Training

People are the most important asset of EHS Support. Achieving EHS objectives requires appropriate training, effective communication and assessment of employees and the implementation of appropriate programs. Successful performance depends on effective communication and knowledgeable people with the skills, competencies, awareness and behavior necessary to complete their work. Training will be based on experience, skill levels, capabilities and regulatory requirements and tracked in our electronic database.

ELEMENT 7 - Emergency Management & Community Awareness

The goal is to be proactive rather than reactive in planning and preparing for a safe and effective emergency response to incidents that mitigate the consequences, prevents further harm and enables a safe efficient resumption of normal operations.

Community awareness is an important factor in maintaining confidence in the integrity of our business. Emergency planning and preparedness for each project are essential to ensure that, in the event of an incident, all necessary actions are taken for the protection of the public, the environment and company personnel and assets. Each project entails thorough hazard and risk identification and personnel are trained according to their responsibilities and assignments.

ELEMENT 8 - Incident Investigation, Analysis & Management

EHS Support maintains the belief that we can operate without incident despite the often difficult conditions in which we may face. We effectively manage all incidents, including work-related injuries, accidents, regulatory violations, and near misses immediately and thoroughly.

Effective communication and proper incident investigation, reporting, and follow-up are necessary to assure the opportunity to learn from reported incidents and to use this important information to take corrective action and prevent recurrence.
ELEMENT 9 - MANAGEMENT OF CHANGE

Changes in services, procedures, site standards, facilities, or personnel must be evaluated and managed to ensure that risks arising from these changes are properly assessed and managed. When a plan is developed to complete a task, the hazards have been identified and either eliminated or mitigated. As the project progresses, tasks may change, revealing new hazards. Personnel undertaking the tasks shall develop alternative methodology for completion and receive authorization for approval of changes.

ELEMENT 10 - THIRD PARTY SERVICES

Third parties (contractors and contracted personnel working directly with or for EHS Support and suppliers) impact EHS Support’s business and reputation. It is essential that they perform in a manner that is consistent and compatible with EHS Support’s EHS policies, procedures and expectations. To ensure that EHS risks associated with contractor and supplier activities are effectively managed, third parties must be prequalified and approved to work on EHS Support projects and periodically audited.

ELEMENT 11 - EHS PERFORMANCE MONITORING, MEASUREMENT, REPORTING & IMPROVEMENT

To ensure continuous improvement, EHS performance shall be accurately monitored, measured, recorded and analyzed. The results of analysis shall be reviewed and provided to management to facilitate a basis for decision making in compliance and business improvement decisions. The EHS performance data shall be relevant, consistent, transparent, accurate and complete for internal review and public disclosure where required.

Ensure EHS Performance is reviewed with respect to the following:

- Achievement of EHS Plan and objectives;
- Audits, reviews and self-assessments;
- Compliance with federal, state and local regulations;
- Corrective actions closeout; and
- Leading and lagging indicators.

ELEMENT 12 - EHS AUDITS AND ASSUARANCE

The expectation is that project tasks and services are compliant with the requirements defined by our management system, elements and standards. To provide assurance that the EHS Management Standards requirements are implemented in the business and are effective in reducing EHS risk, periodic EHS Audits will be conducted. The execution of the audits utilizes a risk-based approach and cover regulatory compliance, risk management, communications, documentation and contractor compliance.

ELEMENT 13 - EHS SYSTEMS REVIEW

Continuous systems review ensures that the EHSMS continues to be an effective means of satisfying EHS Support’s EHS Policy commitments. Reviews will include data such as leading and lagging indicators, audit findings, nonconformance and incident statistics. The process will assess system strengths and weaknesses and include, as appropriate: the need for policy or management system changes; objectives, goals and work plans in light of changing circumstances and the commitment to continuous improvement; resource allocation for system implementation and maintenance; and significant issues from risk assessments and changing regulatory requirements. Conducted annually by a team that includes representation from all levels of the company, the review will identify actions for improvement and further the organization’s EHS goals and objectives.

ELEMENT 14 - CONTINUOUS IMPROVEMENT IMPLEMENTATION

All management systems must include a process that fosters the continuous improvement of the system. To grow and adapt with our business we will update, modify, and improve our EHS Process and Procedures to ensure a safe environment, the correction of program deficiencies and the ongoing improvement of performance.
EHS Support embraces environmental, health and safety objectives as core business values. At EHS Support, our fundamental belief is that all personnel working for EHS Support shall be provided a safe and healthful place of employment, and go home safely at the end of the day. Equally important is our firm belief that we care for and protect, to the fullest extent possible, the environment, and the communities in which we operate and support.

In order to achieve this, the company shall endeavor to provide for employee livelihood, client needs, and shareholder returns through application of management systems that protects the environment, safeguards employee's health, and eliminates injuries to people. EHS Support believes these goals may be best achieved by:

- Demonstrate visible and active leadership in all of our business activities by providing resources necessary to manage and communicate EHS commitment, expectations, and accountability in the same manner as any other critical business function. Appropriate systems and procedures will be enforced to ensure compliance with this policy and these principles.
- Educate employees on safe work behaviors
- Implement proactive hazard identification and follow through with elimination and control of identified hazards
- Implement and audit continuous EHS improvement processes
- Promote a positive “Safety Culture” lifestyle both on and off the job
- Comply with applicable laws, regulations, and statutory obligations
- Ensure open lines of communication to employees, subcontractors, and visitors to our work sites regarding EHS Support’s workplace health and safety arrangements
- Develop processes that facilitate continual improvement in the health and safety management system and our health and safety performance.

EHS Support’s business plans include measurable EHS targets so that everyone who performs work for the company is responsible and held accountable to help achieve these targets.

My message is very straightforward – If we cannot do a task or project safely, without harm to the environment or in violation of Federal and State guidelines or EHS Support’s policies, then we shall not move forward with the task or project. Simple.

Kenny Ogilvie
AUGUST 24, 2012