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1.0 Purpose

The purpose of this Practice is to ensure that Contractor and Subcontractor operations are conducted with adequate Health, Safety, Security, Environmental (HSSE) systems and practices. This Practice establishes how BP Wind Energy (hereinafter referred to as Company) evaluates and reinforces Contractor HSSE performance improvement. Company will review Contractor HSSE performance and practices before establishing a contract and commencing Contractor operations.

2.0 Reference

Key Documents

- **HSSE Requirements** – Document that specifies the HSSE requirements for Contractors and its Sub-Contractors performing work at Company Operations Sites and at Company Project Sites.
- **Management of Change (MOC)** – Document authorizing a variation from standard requirements and process. If Company employs a Red/Not Approved Contractor, Company Responsible Party(ies) will do so only after identifying HSSE risks and undertaking mitigating actions.



References

- **The BP Golden Rules of Safety** – Company standards for safeguarding personal safety and the key controls and procedures that the workforce must comply with in the workplace.
- **OMS** – Company framework for managing HSSE and Operational risk: “Operating Management System”
- **Company Safety/Safe Practices Manuals** – Company reference and guidance manuals/procedures related to Company safety and industry-established best practices.

Tools

- **Safety Observation Conversations (SOC)** – SOC is a management tool that provides leaders a mirror reflection of how their HSSE expectations are being translated into action in the field and industrial facilities. The SOC technique focuses on observations of people working and then engages them in a non-threatening conversation about the safety aspects of his or her work. The end result is improved safety performance as a result of recognizing and correcting unsafe conditions and behaviors
- **Contractor HSSE Information Databases** – Company or third party databases (PICS) that provide Contractor statistical and HSSE information. Data typically supplements Company’s knowledge about Contractor HSSE performance.
- **Traction** – Company database that allows line personnel to enter data about incidents, verifications, or reviews, including close out of actions by Company Responsible Parties.

3.0 Scope

This Practice applies to all BP Wind Energy controlled construction projects and operating sites.

4.0 Responsibilities

Each operating area or project site will further determine and establish the key roles and responsibilities for Contractor/Supplier Performance Management.



5.0 Definitions

The following definitions apply to this Practice.

Definitions	
BP Accompanied Contractor	A Contractor that works On-Site accompanied by Company Responsible Party.
BUL	Business Unit Leader.
Central Safety Committee (CSC)	The BU oversight team that monitors HSSE performance for all Suppliers.
Company Project Site	Location where a contract stipulates that work performed is under the auspices of this Practice.
Company Responsible Party	The individual with delegated authority to act on behalf of Company.
Company Site	Location owned or leased by Company where Company is the operator of record. Company Site may comprise multiple work locations.
Consultant	A Contractor that provides 'hands off - no physical work on Site' administrative or technical support to Company.
Contractor	A Supplier that provides services to Company. This includes both the contractor with contractual relationship with Company, and all subcontractors that perform work in relation to the contract.
CSC	Central Safety Committee.
High Impact Contractor	A Contractor whose risk level based on service line and historical work performed creates a relatively higher HSSE and/or business risk to Company.
Minor Service Provider	Contractor that provides very minor services at a project or operating site.
Off-Site Supplier / Contractor / Vendor	Any Supplier that provides Company with people, material, service or equipment that is not an On-Site Supplier/Contractor.
On-Site Supplier / Contractor	Any Supplier/Contractor that is required to have PPE while engaged in work On-Site.
PICS – PICS Auditing	Contractor selected by BP Wind Energy to manage contractor data.
Safety & Health Improvement Plan (SHIP)	A document prepared to assist contractor in improving performance.
Site / On-Site	Company Site or Company Project Site.
Sub-Contractor	A firm that performs work for a Contractor On-Site.



Definitions	
Supplier	Any firm that provides people, material, service or equipment to Company.
TRIR	Total Recordable Incidence Rate (TRIR) is derived by multiplying the number of recordable injuries by 200,000 and dividing this value by the total man-hours
Vendor	A Supplier that provides tangible material or equipment.

5.0 Procedure

Company may retain Contractors who meet business performance expectations, including TRIR and HSSE Requirements, who have an approved Management of Change (MOC) process, or who are BP Accompanied Contractors. The BU has established the Central Safety Committee (CSC) as the appropriate oversight body for evaluating and improving Contractor HSSE performance.

The CSC provides counsel to the operating sites and project sites who administer Contractor HSSE performance improvement efforts day-to-day. CSC's role is more than advisory: it provides critical HSSE input to the Company Responsible Parties who have accountability for making decisions related to Contractor use.

For simplification, a process flow chart is provided in Appendix B of this procedure detailing expectations of this procedure.

6.1 HSSE Status of Contractors

System for Indicating Contractor HSSE Status

Company has established the following system for indicating Contractor HSSE Status following the standard Company HSSE evaluation. The status is available in the PICS database.

Contractor HSSE Status	
Green/Approved	≤ 2.0 TRIR On-Site (based on 36 month rolling average) and meets all other HSSE Requirements.
Yellow/Conditionally Approved	> 2.0 < 5 TRIR or ≤ 2.0 TRIR On-Site (based on 36 month rolling average) but does not meet HSSE Requirements. This contractor will require a SHIP and a MOC signed by the Director of Projects or Operations, as applicable.
RED/NOT APPROVED	> 5.0 TRIR On-Site (based on 36 month rolling average) <i>or</i> does not meet HSSE Requirements.
RED Approved MOC	> 5.0 TRIR On-Site or does not meet other HSSE



Only	Requirements. Use of this Contractor is allowed only with an MOC and SHIP approved by the BUL enabling use under specific criteria.
RED New Under MOC	New Contractor for whom no TRIR On-Site data is available <i>and</i> who does not meet all other HSSE Requirements. Use of this Contractor is allowed only with an MOC approved by Company Responsible Party enabling use under specific criteria.
Not Required	HSSE verification is not required (e.g., BP Accompanied, Vendor, Minor Service Provider or Off-Site Contractors).

Clarifying Notes for Assigning Status

- Company may assign a Red/Not Approved Status to a Contractor for whom verification results indicate failure to meet HSSE Requirements.
- Company may at its sole discretion assign a Red/Not Approved Status to a Contractor when Company determines continued use of the Contractor constitutes an unacceptable level of HSSE risk (e.g., Contractor incurs fatality while working in non-Company operations, continual violations of safety policies, etc.).
- In PICS, the color of the flag will NOT change because a MOC has been authorized. This will be noted in the “Contractor Tags” section of the individual contractor dashboard page. Contractor tags may be for specific projects/locations, or multiple operating areas. Generally, MOC’s for construction sites will be temporary (for the duration of the project) and project specific as they will contain project specific activities and responsibilities.

6.2 Further Guidelines Related to HSSE Status

Green/Approved

- Contractor subject to verification based on incident occurrence and/or risk assessment. Company requires that Contractor achieve ≤ 2.0 TRIR On-Site and meet HSSE Requirements within a 12 month period of above classification.

Yellow/Conditionally Approved

- Company requires that Contractor achieve 2.0 – 5.0 TRIR On-Site and meet HSSE Requirements within a 12 month period of above classification. This may require the completion of a detailed audit by a BP HSSE representative or contractor. A SHIP will be required before a contractor of this status is allowed to work. Additionally, a MOC is required with final approval by the Director of Projects or Operations as applicable. Contractors failing to meet this expectation will be reclassified to Red/Not Approved.



- Company may, from time to time, verify Contractor's progress toward meeting HSSE Requirements.
- Before changing Contractor status to Green/Approved, the CSC will determine the level of field verification that must take place.

RED/NOT APPROVED

- TRIR > 5.0 – use not allowed without an MOC approved by the HSSE Director and BUL.

Grey/No Status

- This would typically be reserved for contractors that are exempted from the process by either MOC or specific exclusion (See Appendix C)

BP Accompanied Contractor

From time to time, there are instances when a **short duration** or non-routine Contractor is needed to perform work but the Company cannot conduct the typical HSSE performance evaluation due to time constraints or business reasons. Contractor approved to work in this instance is a BP Accompanied Contractor. This option should not be used as a matter of convenience to bring a contractor on board due to lack of foresight or planning.

HSSE Requirements do not apply in the typical way to a BP Accompanied Contractor. Rather, when hiring a Contractor under these circumstances, the Company Responsible Party assesses HSSE risk and develops the appropriate HSSE plan (including specific HSSE requirements) to mitigate that risk. Every HSSE plan requires that a Company Responsible Party accompany the Contractor while On-Site if the Contractor is required to wear PPE.

Company may employ a Contractor categorized as BP Accompanied Contractor when no approved Contractor is available to perform the required work subject to the limitation above.

Contractors that BP uses for emergency purposes may also be BP Accompanied Contractors.

The BP Accompanied Contractor form must be filled out (see appendix D) prior to beginning work.

Minor Service Provider

A Minor Service Provider is a contractor or sub-contractor who provides very minor services (non-construction and non-turbine / substation maintenance) at a project or operating site. These contractors perform routine low risk services, and are designated in Appendix C of this policy

Designation as a minor service provide requires Site Manager or Facility Manager designation



as such in writing, including the limits of work that can be performed under this designation. This designation shall be managed through the eMOC process for documentation of the review and approval of exception to policy.

General / Other Guidelines Related to HSSE Status

HSSE Status as outlined in this Practice does not automatically determine eligibility for participation in supply opportunities (for example: bidding, tendering). The Company will evaluate Contractor HSSE performance as part of the procurement process.

6.3 Management of Change (MOC) and Use of Yellow and Red Contractors

For any variation from general procedures, the MOC process is utilized. With respect to this Practice for Contractor HSSE Performance Evaluation, all we will utilize a standardized MOC process whenever a Yellow Conditionally Approved or Red/Not Approved contractor is utilized. In every instance of this kind, the Company Responsible Party must prepare and obtain approval of an MOC, prior to Yellow Conditionally Approved or Red/Not Approved Contractor commencing work On-Site. The standardized MOC process contains the following elements, among others:

- Electronic access to MOC utility.
- Detailed delineation of roles, actions, accountabilities, and timelines for any activity sets that Company Responsible Party(ies), Contractor, and Sub-Contractors must perform prior to commencing work On-Site.
- An HSSE Action/Job Plan (SHIP).

6.4 Contractor HSSE Performance: Company Monitoring Process

The Company may utilize internal and external auditors to verify Contractor compliance with HSSE Requirements. The CSC will determine the type and frequency of self-assurance/verification and will assign appropriate assurance/verification coordinators to manage the monitoring process. Company will communicate verification results to Contractor and will use results to assign HSSE Status.

Contractor is solely accountable and responsible for ensuring that Contractor AND its Sub-Contractors are similarly assessed and comply with HSSE Requirements and for improving HSSE performance in a manner consistent with the contract between Company and Contractor.

7.0 Training

6.1 Training will be conducted as appropriate to applicable personnel.



8.0 Auditing

- 8.1 Periodic audits will be conducted jointly by the HSSE, Project Engineering, and operations teams.
- 8.2 The procedure shall be audited at the end of the first year of execution to determine the effectiveness of the system. This procedure shall then be audited every three years thereafter.
- 8.3 The results of the audit shall be summarized and delivered to the BP Wind Energy Central Safety Committee.
- 8.4 Any findings from the audit shall be incorporated into revisions of the procedure.

9.0 Exhibits

- 9.1 BP Wind Energy SHIP.
- 9.2 PICS Process Flow Chart
- 9.3 Approved “Minor Service Contractors” list
- 9.4 HSSE Plan for BP Accompanied Contractors

Revision Log

Note: Changes must be approved by the HSSE Director (authority) with appropriate eMOC.

Revision Date	Authority	Custodian	Revision Details



(Exhibit 1)

**BP Wind Energy
Safety & Health Improvement Plan for Contractor**

Name of Contractor: Contact/Telephone #: Address:	Date: HSSE Liaison:
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REASON FOR PLAN:			
<input type="checkbox"/> Exceeded Threshold Performance (TRIR / DAFW statistics)	<input type="checkbox"/> Fatality in the last 3 years	<input type="checkbox"/> Deficient or absent plan/program for Drug & Alcohol	<input type="checkbox"/> Deficient or absent plan for Pre-Job Hazard Analysis
<input type="checkbox"/> Deficient or absent Regulatory Compliance Program	<input type="checkbox"/> Deficient or absent Audit/Inspection Program	<input type="checkbox"/> Deficient or absent Training to ensure competency	<input type="checkbox"/> OTHER

Plan Narrative and Actions	Status of Action:
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Agreed Key Performance Indicators:



Document No. _____ *TBD* _____



Revision Number 0

Record of Quarterly Reviews:?????

Agreements / Authorizations:

Contractor Representative:	Date:	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree
BPWE Representative:	Date:	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree
HSSE Liaison:	Date:	<input type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree

Attach to eMOC



Exhibit 2 PICS Process Flow Chart

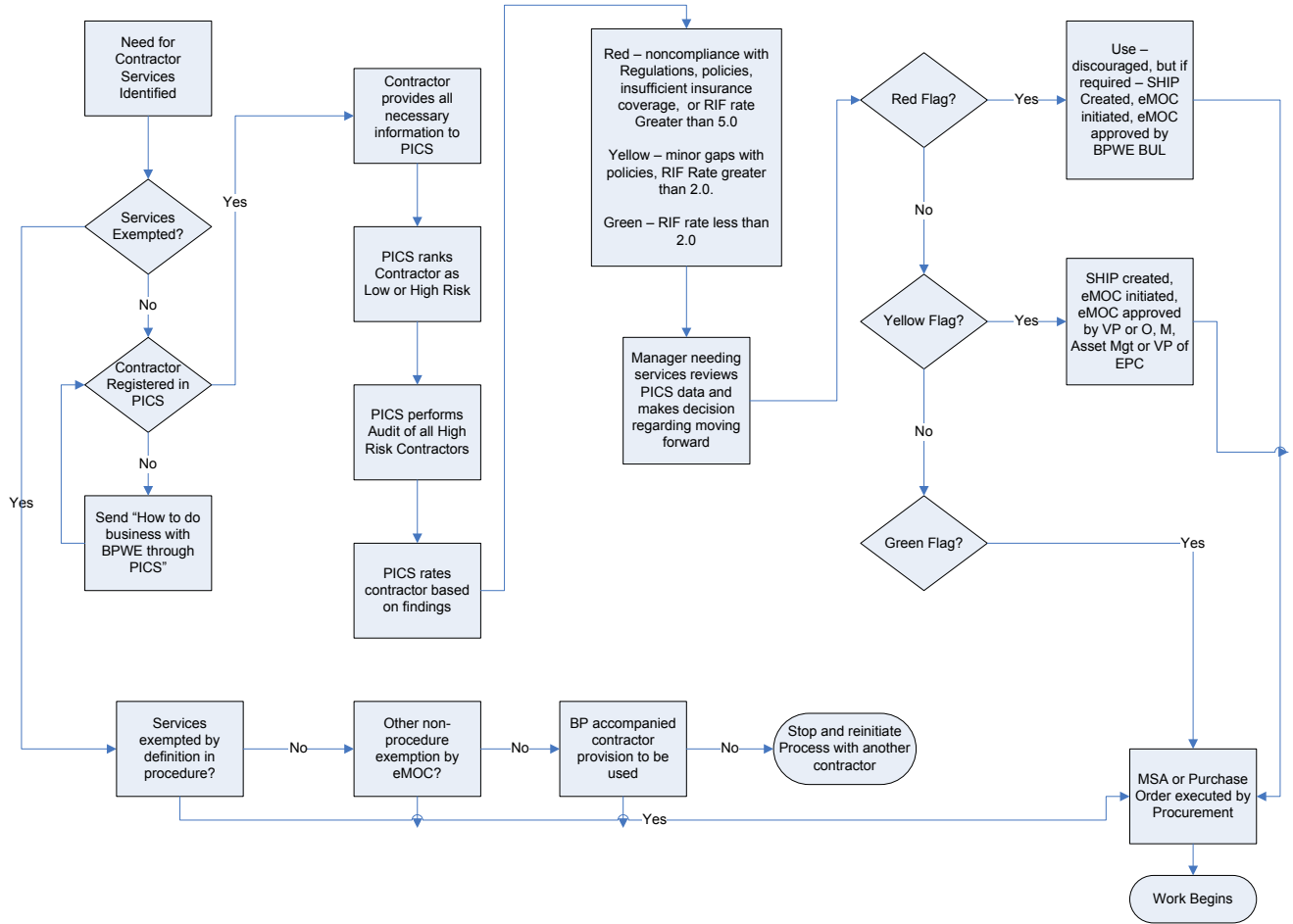




Exhibit 3
Approved Minor Service Contractors

- Mail/Parcel service (USPS, UPS, FedEx, etc.)
- Office janitorial services
- Portable latrine cleaning services
- Bottled water and Ice delivery
- Parts supply (such as local automotive supply delivering parts to site)
- Independent owners and bankers engineers
- Local utility interconnect (phone, internet, etc)
- Food and beverage catering and delivery services
- Companies supplying manpower services (Clover, Techsis, etc) where employees are seconded to BPWE
- Office building maintenance services (those which are provided by the owner of the building.)
- Legal services
- Companies providing off site engineering services
- All vendors only supplying a product that involves no related services provided on site.



Exhibit 4
BP Accompanied Contractor
HSSE Plan

**BP Wind Energy
“BP Accompanied Contractor” Guidance Document**

Name of Contractor:	Date initiated:	Date Job Ended:
Contact/Telephone #:	Effective Dates: -	
Address:	Responsible Person:	
Description of Work:	Business Reason for Use:	

Scope: As stated in the BPWE Contractor HSSE Performance Evaluation Practice, this document will serve as a guideline for employing BP Accompanied Contractors. **Expectations:** When a short-duration or non-routine contractor is needed to perform work, but the company can not conduct the typical HSSE performance evaluation due to time constraints or business reasons, the BP **Company Responsible Party** assesses HSSE Risks and develops an appropriate HSSE Plan (including specific HSSE requirements) to mitigate that risk. This guidance checklist may be used to assure consistency when preparing an HSSE Plan. Every HSSE plan requires that a Company Responsible Party accompanies the Contractor while on site while the contractor is required to wear PPE. Contractors which BP uses for emergency use may also be BP Accompanied contractors.
Always assure there is a contract agreement in place prior to work.

Pre-Job Planning Meeting Subject Matter	Discussed:			Note: Any No answer requires comment.	Comments
1) Job Safety Analysis / Procedures	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A		
2) Emergency Action Plan	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A		
3) Haz-com / MSDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A		
4) PPE Assessment	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A		
5) Orientation / HSE Policy	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A		
6) Permits Reviewed and Completed	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A		
7) Site Specific Requirements	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A		
8) Regulatory Requirements	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A		



- 9) Equipment/Tools/inspections Yes No N/A
- 10) Training/Certifications Required Yes No N/A
- 11) Incident Reporting Requirements Yes No N/A
- 12) Short service Employee/Mentor Yes No N/A
- 13) Driving Issues Yes No N/A
- 14) Waste Management Yes No N/A

BP Company Responsible Party: _____

Agree Disagree

Contractor Signature: _____

Agree Disagree

OC Manager or Delegate: _____

Agree Disagree

Note: Documentation to be maintained on the BPWE site.