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***NS HSE***  
***MANAGEMENT SYSTEMS***  
***AND PROGRAMS***

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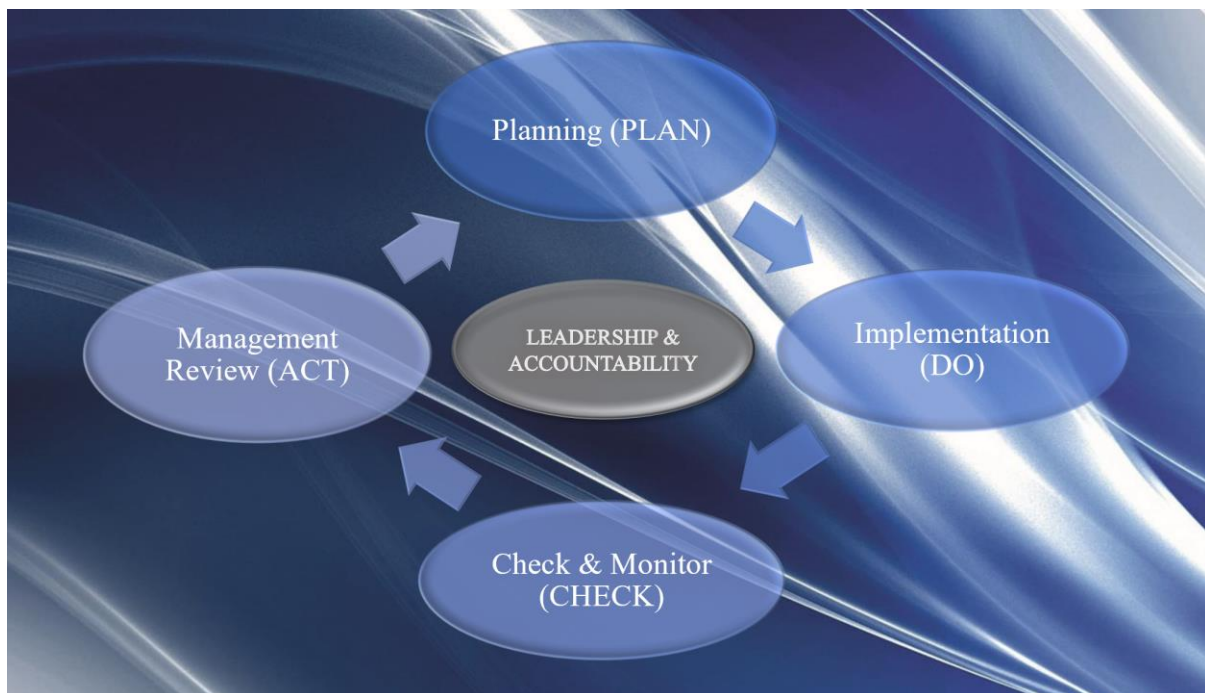
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## Introduction

NS is committed to the highest standard of responsibility in every activity it undertakes to protect the environment, public health and employee safety and to comply fully with all applicable laws and regulations.

Our commitment to protecting the environment and the health and safety of our employees and the communities we serve worldwide represents a critical part of the core values that guide our corporation. As part of that commitment, all NS employees actively support these values and strive to achieve continual and measurable improvement of all our processes and products.

## HSE MANAGEMENT SYSTEM



## Scope

This Worldwide HSE Management System applies to all NS businesses, including joint ventures in which NS holds more than fifty percent share or has operational responsibility or both.

## Reference

1. NS Corporate HSE Manual
2. NS Occupational Health Manual

## **HSE Management System Elements (Requirements)**

### **1 Leadership & Accountability**

#### **1.1 Management Commitment & Direction**

The objective of a clear, written statement of HSE policy serves to establish the standard of expected performance, become a guide whenever a conflict arises between HSE and expediency, and establish a foundation for the HSEMS, plus behavioral and cultural change.

In order for these objectives to be achieved, employee input and buy-in is essential. This can be accomplished through periodic reviews and discussions with all employees, and subsequent follow-up actions to support the policy statement. The HSE policy should be available to employees, dated, signed and issued by top management, and displayed throughout the work area.

Line management will actively demonstrate commitment to protecting the health and safety of employees, the public and the environment through adherence to policy, allocation of resources, visible leadership and the establishment of accountability and communication systems. Continual improvement of HSE performance will be an integral part of every business.

The HSE process must be considered in all aspects of the business (production, cost, quality, engineering, outsourcing, product, etc.) and be tied to objectives and MRA's. Structured HSE committees and sub-committees must be chartered and meeting minutes documented. Management must help develop and encourage HSE work practices through procedures that establish expectations for all employees, visitors and contractors to follow.

#### **1.2. Employee Roles & Responsibility**

Employee involvement and active participation in the HSE process is critical to identifying and controlling risks. Employees are encouraged to participate in the development of allocation of resources, policy and procedures, correcting unsafe conditions and behaviors, reinforcing safe behaviors, providing solutions for solving problems, action plans, and being responsible for their own safety and that of their fellow workers.

Additionally, each facility shall designate one person (s) in the organization to take full (or part-time) responsibility for the day-to-day administration of the HSE program. Part-time employees must devote enough time to the HSE management system to meet the HSE objectives and goals. The role of the HSE coordinator is to be an advisor and planner to the organization, make recommendations for addressing regulatory compliance issues and risks, serve as a liaison between Corporate HSE and the location, serve on HSE committees and facilitate new initiatives.

### **2 Planning (PLAN)**

#### **2.1 Hazard Control and Risk Management**

##### **A. Risk Assessment**



Each site will identify the risks and hazards posed by NS facilities and operations. Each business shall endeavor to eliminate or manage risks and hazards through sound engineering design, well-executed installation and construction, and appropriate control systems.

Management will assure that new facility and equipment is designed and constructed to be protective of the environment and the health and safety of the workers and public. Each business will incorporate appropriate HSE considerations into facility planning and design, operation and maintenance, shutdown and decommissioning to minimize HSE impacts and liability and maximize the salvage value of company assets.

Management will assure that facility and processes are operated and maintained in a manner to protect the environment and the health and safety of the workers and public. Critical procedures will be documented and management will assure the competence of the workers to safely operate and maintain facilities.

Provisions must be made for furnishing personal protective equipment (PPE) to employees at those operations where potential risks and/or exposures have not been completely eliminated or controlled through engineering design and revision. Whenever PPE are provided, procedures must be adopted to ensure that the equipment will be used as required and meets regulatory requirements. Local policies should be developed relating to the purchase of approved equipment only, and the maintenance of an adequate supply with replacement parts, whenever practical, with instructions on the issuance, use, care and replacement of such equipment.

Each facility will maintain an accurate and current list of the hazardous materials managed on site, waste streams, and emissions and discharges to air, land, and water. Site management will manage each facility to assure that these activities do not adversely affect the environment, the health of employees or the public.

## **B. Industrial Hygiene Standards**

Each site shall establish a comprehensive industrial hygiene program to ensure that chemical and physical hazards are identified, evaluated and controlled in accordance with NS standards on Industrial Hygiene. Also up-to-date MSDS s are to be maintained and readily available for employee review and reference when needed.

## **C. Management of Change**

Each site shall have management of change procedures in place to ensure that all changes to products, processes, operations and procedures are first thoroughly and systematically evaluated to assure that HSE performance is maintained or enhanced. The evaluation will include experienced professionals in the appropriate HSE fields.

## **2.2 Laws & Regulations**

Each facility will assure that all personnel, as appropriate, understand and comply with all HSE laws, regulations and ordinances relevant to their operations and activities. Every business unit and facility will maintain all necessary permits, licenses and other approvals or registrations, in current and operative status. Each business unit and facility will maintain documentation of compliance with applicable HSE laws, regulations and permits.

### **3 Implementation (D0)**

#### **3.1 Education & Training**

Education and training is a fundamental part of an HSE program, and an important factor in incident prevention. Management will assure that all employees receive HSE training appropriate for their job duties. At a minimum, training will include NS policies and standards, compliance requirements, and management of HSE risks. All HSE professionals will have appropriate education, experience, and training sufficient to perform their duties. HSE tasks performed by non-HSE professionals will meet the same standards of performance as those performed by HSE professionals. Training shall be documented and verified through testing when appropriate.

All visitors and contractors on NS facilities or job sites shall receive an orientation prior to beginning work.

#### **3.2 HSE Communications**

Management will regularly communicate its commitment to the continual improvement of HSE performance, articulating the responsibilities of all employees in achieving the desired level of performance and sharing with employee progress in meeting those objectives. Each facility will maintain a positive relationship with its home community, including appropriate communications describing the nature of the operations and the hazardous materials manufactured or handled. Each facility will participate as appropriate with local agencies, authorities and the public to minimize the risk posed by our products and activities.

The form of the communication should support the organization by generating management reports, participating in staff meetings, developing internal HSE notifications and updates to help employees to stay aware, up-to-date and focused. In some cases there needs to be a system for sharing information with other sites, divisions and even the corporation when a serious incident occurred or a milestone has been reached. To keep vigilance on HSE, sites can use banners, signs, and incentive programs to help communicate HSE.

HSE meetings shall be used to communicate HSE issues and train employees. The frequency of the meetings shall be based on the needs of the facility. The results of the meetings shall be documented.

#### **3.3 Rules & Procedures**

HSE rules and procedures shall be established and made available to all employees. Also departmental rules and procedures shall be established based on the safe operation and handling

of specific equipment, process jobs or machines. These rules and procedures should be developed on the basis of site job requirements and any applicable regulatory requirements. All HSE rules and procedures should have significant employee input.

Specific procedures such as control of energy sources, hot work, confined space entry and hazard communication should be in place based on the applicability to the site.

### **3.4 Emergency Planning & Medical Surveillance**

#### **A. Emergency Planning**

Each facility shall have plans in place to address emergencies that may result from fire, serious injury, natural disaster, process upset or environmental release. Internal and external resources, with clearly defined lines of authority and communication, will be identified, documented and included in planning and training exercises. The plan shall include evacuation procedures, fire and rescue resources, training and periodic drills. Employees must be trained in evacuation procedures.

Local fire departments must be given a periodic tour and a copy of the emergency plan. Facilities that have an Emergency Response Team (ERT) or Fire Brigade must ensure that the appropriate training has been given to their members before responding to fires and/or spills.

#### **B. Medical Surveillance**

Every facility shall establish and maintain pre-placement and periodic medical and examination and testing programs appropriate for exposures or job functions reasonably expected in the workplace utilizing the Occupational Health Manual criteria. Pre-employment, post incident and random substance abuse testing programs shall be established at all sites unless prohibited by law.

Every facility shall provide appropriate medical treatment for all work-related illnesses and injuries. Appropriate medical approval shall be required to return to work following an extended illness or injury.

### **3.5 Documents & Records**

All documents and data needed to manage operations and demonstrate compliance with this management system and regulatory requirements will be maintained in accordance with NS records retention policy.

### **3.6 Contractor & Vendor (Supplier) Management**

Management will assure that all contract services performed for the company are suitably protective of the environment and of human health and safety. Contractors working on NS sites will perform their tasks in accordance with NS HSE standards. Sites shall have a written procedure for managing contractors and vendors that meet the requirements of the NS Contractor Procedure. Appropriate HSE information (i.e.-current and past HSE performance, programs,

policies, etc.) shall be requested as part of the job bid package. Once the contractor has been selected and is on the job site, provisions shall be made for an HSE orientation.

NS employees working as contractors on customer sites will perform their duties in accordance to NS HSE standards or their equivalent. Off-site contract services (toll or outsource manufacturing, trans-loading, warehousing, waste treatment) will be held to appropriately high standards of HSE performance.

Periodic audits of contractors and vendors shall be conducted and results documented.

### **3.7 Product Safety**

Management will incorporate appropriate considerations for HSE into all stages of each product including design and development, manufacture/formulation/assembly, distribution, storage, end use and final disposal. These considerations will include the facilities and equipment used to manufacture, store and distribute NS products.

### **3.8 Security & Travel Safety**

#### **A. Security**

It is important to have a formalized security program in place that complies with corporate and in some cases government procedures. Each business and site will have in place appropriate measures to protect its facilities and assets, business information, products, wastes and other materials from unauthorized personnel. These security efforts will be designed to prevent unauthorized personnel from putting the environment, human health or safety or NS ability to effectively conduct its business at risk.

The security force or other appropriate personnel should be trained in assessing risk and administering an orientation program to visitors. Also maintain day-to-day security activities which involve: entry/exiting, emergency response plan, badges, screening practices, theft (vandalism) and in some cases, decontamination procedures.

Standard programs and processes such as perimeter guarding, guard services, alarm systems, business resumption plans, workplace violence programs, etc. are examples of measures to be considered to address security risks at facilities.

#### **B. Travel Safety**

All employees who travel should take proper precautions to ensure their safety. As a minimum, the Corporate Security Web Page should be accessed to review travel safety guidelines, bans or advisories; country profiles if you are traveling internationally; and other important information. It is also advised that a contact person, including phone number, be obtained prior to visiting a site. Defensive driving safety training is recommended for those employees who drive vehicles during company business.



Prior to beginning a field service and installation job, emergency response and medical contact phone numbers should be obtained. Additionally, upon arrival at the site, an evaluation of the work area should be conducted to identify potential emergency situations, evacuation routes and any emergency procedures required by the customer. Employees who travel internationally should also carry SOS or equivalent medical cards, receive appropriate immunizations and carry first aid kits if medical services are not readily available.

## **4 Checking & Monitoring (CHECK)**

### **4.1 Audits & Inspections**

The effect that the site HSE management process is having on HSE performance can be monitored by a series of audits and inspections designed to identify and correct unsafe behavior and conditions. These programs shall be present at each site and involve all levels of the organization. For the purposes of this element of the HSEMS, audits are spot checks that are conducted of behavior, conditions, programs, etc. while inspections are detailed evaluations of equipment, work areas, procedures, regulations etc.

#### **A. Audits**

Each facility shall have an audit program specifically focusing on at-risk behavior and unsafe conditions. The audits should address all shifts, areas and employees and be conducted periodically by a cross section of the workforce

#### **B. Inspections**

1. Preventative Maintenance (PM) – The equipment requirements for facilities will vary depending upon the layout, size and nature of the building or work site. Nearly all locations will have certain general requirements and facilities which require periodic inspections by engineering and maintenance personnel. The frequency of these inspections will vary to some extent depending on the equipment, its frequency of use and nature of conditions being disclosed as a result of experience. Each location will develop a written checklist for those items requiring periodic inspections. Appropriate personnel will be assigned to ensure that the inspections are conducted, results are documented and corrections are made.

2. General Inspections – Each location shall implement a program to ensure that operating and fire/emergency equipment are regularly inspected as required by law, code or risk. Additionally, general housekeeping inspections should be included.

The audit and inspection programs shall have a requirement for providing feedback and a tracking mechanism to ensure follow-up and closure of audit and inspection findings.

3. Regulatory Inspections – Each site shall implement a process for assessing compliance with appropriate regulatory requirements.

### **4.2 Incident Reporting & Investigation**

Each facility shall have a written procedure for reporting and investigating all incidents as required by the Corporate HSE standards.

Site management will investigate incidents and near misses that had (or might have had), significant consequences for employees, the local community, the environment or facilities. All investigations will be conducted promptly and will gather sufficient information to identify the direct and indirect (root causes) of each incident. The site will implement corrective action to prevent recurrence of the event as quickly as possible and will document such corrective action.

Annually an analysis of all incident investigations will be conducted to determine corrective action to address deficiencies relating to the HSEMS, environmental, unsafe conditions and at-risk behaviors.

## **5 Management Review (ACT)**

### **5.1 Process Assessment & Improvement**

Business and site management will periodically assess its HSEMS, HSE performance, conformance with NS HSE standards and compliance with all legal and regulatory requirements. This evaluation will be performed at least annually to drive continual improvement of HSE performance and will be formally documented in an HSE Improvement Plan.

## **6 Industrial Hygiene Protocol**

### **6.1 General Policy**

It is the policy of NS to conduct its business in a manner that safeguards occupational health and in-so-doing complies with all applicable laws and regulations.

### **6.2 Standards for Policy Implementation**

- |                                 |   |
|---------------------------------|---|
| 1. Compliance and Understanding | Every facility shall, at all organizational levels, demonstrate understanding of, and compliance with, corporate standards and methods as well as all applicable federal, state and local laws and regulations relating to occupational health. |
| 2. General Management           | Every facility shall maintain the organizational capability to manage and implement the occupational health policy and standards. Annual occupational health objectives and action plan shall be developed by the responsibility manager.       |
| 3. Information Management       | Every facility shall collect and maintain specific employee exposure and medical information in a manner applying uniform standards utilizing Occupational Health Information   |

Management criteria, in order to facilitate administration, communication and trend analysis, while protecting the confidentiality of individual medical information.

4. Training                      Every facility shall implement timely and effective health hazard and Occupational Health Information Management education.
  
5. Identification                Every facility shall develop, implement and maintain:
  - A comprehensive health hazard identification system using departments or work areas of potential exposure to toxic chemicals or physical agents.
  - Methods and procedures for estimating and prioritizing potential exposures to these substances.
  
6. Evaluation                    Every facility shall conduct sufficient initial monitoring to evaluate, on a priority basis, whether exposure to toxic chemicals and physical agents in excess of permissible exposure levels.
  
7. New Installations          All new processes and equipment shall be engineered and specified so as to prevent employees from exposure to toxic chemicals and physical agents in excess of permissible exposure levels.
  
8. Remediation                 Every facility shall take effective engineering, procedural, or other remedies to correct adverse findings from any industrial hygiene or medical evaluation.
  
9. Engineering Controls      Every facility shall ensure effective operation, maintenance and use of devices, equipment and systems installed to protect employees from exposure to toxic chemicals and physical agents in excess of permissible exposure levels.
  
10. Procedures                 Every facility shall develop, communicate, enforce and maintain written operating, maintenance, labeling and warning procedures designed to protect employees from harmful levels of toxic chemicals and physical agents.
  
11. Back-up Exposure Controls    Every facility shall:
  - Maintain high spill prevention, contamination control and housekeeping standards.
  - Make available and maintain personal protective clothing and equipment appropriate for hazards and exposure reasonable expected to occur.

- Establish and maintain personal hygiene services for the use and protection of those who handle toxic chemicals and contaminated equipment.

## 12. Monitoring

Every facility shall routinely monitor workplace exposures to ensure that toxic chemicals and physical agents having the potential for causing health problems are maintained within permissible exposure levels.

## 7 Occupational Health Standards

### 7.1 General Policy

It is the policy of NS to conduct its business in a manner that safeguards occupational health and in so doing complies with all applicable laws and regulations.

### 7.2 Standards for Policy Implementation

**Information Management:** Every facility shall collect and maintain specific employee exposure and medical information in a manner applying uniform standards utilizing Occupational Health Information Management criteria, in order to facilitate administration, communication, and trend analysis, while protecting the confidentiality of individual medical information.

**Training:** Every facility shall implement timely and effective health hazard and Occupational Health Information Management education.

**Medical programs:** Every facility shall establish and maintain placement and periodic medical examination and testing programs appropriate for exposures or job functions reasonably expected in the workplace utilizing the Occupational Health Information Management criteria.

**Treatment & Return-to-Work:** Every facility shall provide appropriate medical treatment for all work-related illnesses or injuries. Appropriate medical approval shall be required to return to work following an extended illness or injury.

## 8 Minimum Standards for Developing a Field Service & Installation HSE Program

### Scope

Applicable to all worldwide field service and installation work.

### Purpose

1. To define HSE programs and processes that are required to be in effect at all field service and installation jobs.



2. To provide guidance for the establishment of an HSE program commensurate with the Corporate HSE Policy and individual site needs.

### **Procedure**

As a minimum, each field service and installation job will have the following HSE program elements in place. Exactly what form these activities take, or how they are implemented will be guided by the individual exposures and needs as determined by the site.

### **8.2 HSE Policy**

The objective of a clear, written statement of HSE policy serves to establish the standard of expected performance, become a guide whenever conflict arises between EHS and expediency, and establishes a foundation for behavioral and cultural change.

In order for this objective to be achieved, employee input and buy-in is essential. This can be accomplished through periodic reviews and discussions with all employees, and subsequent follow-up actions to support the policy statements. HSE policies should reflect the values and beliefs of the organization.

To ensure that the policy continues to be a living document for reinforcing behaviors and a positive culture, it must be periodically reviewed and/or revised to address changes to the work environment including changes to the organization, process or equipment, etc.

### **8.3 Management Direction and Commitment**

The organization's upper management must support the HSE program. The term "SUPPORT" reflects budgeting, active participation in the program (auditing, meetings, site visits, etc.) and providing internal and external resources when needed. The HSE program must filter into all aspects of the business (production, cost, quality, etc.) and be tied to employee objectives and MRAs. Management must foster employees taking ownership and responsibility for their actions and actions of others. Employees must be encouraged to express their concerns and take the initiative to positively reinforce behaviors and correct unsafe conditions. Management must help develop and encourage safe work practices and environmental compliance through rule, policies and standards that establishes expectations of all employees, visitors and contractors to follow.

### **8.4 Employee Roles and Responsibilities**

Employee involvement and active participation in the HSE process is critical to preventing environmental incidents, eliminating unsafe behaviors and ultimately injuries/illnesses. NS approach to managing HSE and accomplishing this objective is to make employees an equal partner. This includes encouraging teamwork and input into the allocation of resources, conducting inspections and audits of the work environment, development of policy and procedures, reinforcing safe behaviors, preventing environmental incidents, providing solutions for solving problems, developing action plans, and being responsible for their safety and that of their fellow workers.

## **8.5 Hazard Control**

### **8.5.1 General HSE**

Incidents can be prevented and exposures reduced to acceptable minimums through the application of sound engineering and HSE standards. These standards should be applied in the planning, design and execution of all field service and installation jobs. These standards

are published by government agencies, insurance companies or associations, various national HSE groups or could be internal NS engineering standards.

### **8.5.2 Personal Protective Equipment**

Provisions must be made for furnishing personal protective equipment to employees at operations where potential HSE exposures have not been completely eliminated or controlled through engineering design and revision. Whenever personal protective equipment or devices are provided, HSE procedures must be adopted to insure that the equipment or device will be used as required and meets regulatory requirements. Policies should be developed relating to the purchase of approved equipment only, and the maintenance of an adequate supply with replacement parts, whenever practical, with instructions on the issuance, use, care and replacement of such equipment.

### **8.5.3 Risk Assessment**

The nature of field service and installation work exposes employees to a variety of potential hazards. Field employees may be required to work at multiple work sites and different customers, be away from home for extended periods of time, drive several miles each year and/or travel both domestically or internationally by airplane. This variability in job assignments requires that a risk assessment be conducted prior to beginning each new assignment to ensure that HSE risks are identified and controlled. Examples of risk assessment tools used at NS field jobs include Job Safety Analysis (JSA) and the Safety Self-Evaluation Risk Analysis Checklist.

### **8.5.4 Management of Change**

Except for replacement in kind, all new or modified equipment, procedures, materials, etc. should be evaluated for HSE risks and approved in writing before the changes are made.

### **8.5.5 Contractors and Sub-Contractors**

Contractors and Sub-Contractors used on NS Field Service and Installation jobs shall follow the requirements of the Corporate Contractor HSE Policy.

### **8.5.6 EHS Training and Education**

EHS education and training is a fundamental part of an HSE program, and an important factor in incident prevention. Sites need to establish a formal HSE training program to ensure that new and

current employees receive ongoing training on controlling risks. The training programs can be provided during meetings, via phone conferences, classrooms, on-the-job, computer-based and/or through methods such as mentoring, etc. Written records should be maintained for all training sessions.

### **8.5.7 Management and Supervisory Personnel**

Newly appointed or reassigned managers or supervisory personnel need to be oriented in the NS HSE management process. This includes the policy, core beliefs, HSE responsibilities, company strategy, auditing and risks relating to their business. After the initial orientation, ongoing HSE training needs to be provided as necessary to ensure that the manager or supervisory personnel is familiar with new programs, regulations, etc.

### **8.5.8 Employee Training and Education**

All new and current employees need to be involved in an ongoing HSE training program. The program includes an orientation program for new employees and ongoing training for current and reassigned employees. Major components of the program include:

- The company strategy and philosophy for managing HSE.
- The annual HSE program for the site
- Employee HSE responsibilities
- HSE rules and regulations for the site.
- The importance of properly reporting all incidents.
- Use of personal protective equipment
- Reporting unsafe behavior and conditions
- Emergency plan and evacuation

These initial activities are to be supplemented by periodic HSE meetings. Areas covered at these meetings include follow-up instructions and additional HSE training and educational programs as required by law and/or need.

## **8.6 Audits and Inspections**

The effect that the site HSE management process is having on creating a safe work environment can be monitored by a series of audits and inspections designed to identify unsafe behavior (practices) and unsafe conditions. These programs should be present at each work site and involve all levels of the organization.

### **8.6.1 Audits**

Each site should have an audit program that focuses on unsafe behavior and conditions. The audits should be conducted periodically at each job site by all levels of the organization. The audit program should also have a requirement for providing feedback to employees being audited and a tracking mechanism to ensure follow-up and closure of audit findings.

## 8.6.2 Inspections

Each site should have an inspection program to ensure that the equipment and general condition of the job site is maintained safely.

1. **Preventative Maintenance (PM)** – Each site should develop a checklist of those items requiring periodic inspections and assign responsibility for making them.
2. **General Inspections** – Each site should implement a program to ensure that operating and fire equipment are regularly inspected as required by law, code or risk.

## 8.7 EHS Rules and Procedures

Each field service organization should develop an HSE manual specific for their operations and risk. The manual should contain procedures for using personal protective equipment, fall protection guidelines, material handling procedures, use of equipment, inspections and audits, reporting and investigating incidents, emergency preparedness, travel safety, medical surveillance, defensive driving, risk assessment, control of energy, etc.

## 8.8 Incident Investigations

Each site should have a procedure for reporting and investigating all HSE incidents. The procedures should include the requirements for incident investigation, time limits for reports, and means for implementing and tracking recommendations to prevent recurrence.

## 8.9 Travel Safety and Security

Field service employees who travel should take proper precautions to ensure their safety. As a minimum, the Corporate Security Web Page should be accessed to review travel safety guidelines, bans or advisories; country profiles if you are traveling internationally; and other important information. It is also advised that a contact person, including phone number, be obtained prior to visiting a site. Defensive driving safety training is recommended for those employees who drive vehicles during company business.

## 8.10 Emergency Response and Medical Surveillance

Prior to beginning a field service and installation job, emergency response and medical contact phone numbers should be obtained. Additionally, upon arrival at the site, an evaluation of the work area should be conducted to identify potential emergency situations, evacuation routes and any emergency procedures required by the customer.