MEGlobal's Contractor

EHS&S Expectations

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Introduction

This document is designed to outline and provide an overview of the basic EH&S requirements for Contractors performing services for MEGlobal. This Contractor EH&S Information package, that contains many details including the Site Standards, shall be shared with the Contractor in the initial stage, and be available upon request.

All MEGlobal partners are expected to share our commitment to NO work-related injuries/illnesses, accidents, or harm to the environment.

At no time shall any Federal or State laws or regulations be violated during the course of conducting business with MEGlobal. At all times the contractor shall follow the more stringent rule(s) whenever there are conflicts between MEGlobal and Contractor EH&S rule(s), while ALWAYS meeting MEGlobal's minimum EH&S requirements.

It is the expectation of MEGlobal that Contractors shall employ best / safe work practices into services, in addition to meeting Federal and State requirements.

Responsible Care - A Total Commitment

MEGlobal is committed to the safe and responsible management of our facilities and products throughout their entire lifecycle, consistent with the guiding principles of the Chemistry Industry Association of Canada Responsible Care® initiative. MEGlobal has integrated the Codes of Practice into every aspect of our operations through our Operating Discipline Management Systems, performance measures, and continuous improvement efforts. This helps us to ensure that the development, manufacture, sale, distribution, transportation, use and disposal of our products, processes, and services will be managed according to the Responsible Care Codes of Practice. EQUATE also adheres to the principles of Responsible Care as part of their commitment to sustainability.

Sustainability

MEGlobal's vision of sustainability requires making the best decisions for our company and our planet-combining economic prosperity with social values. We partner with public institutions, the business community, and the society as a whole in a commitment to achieve sustainability in our operations and for the benefit of our world. We invest in human development, environment, education, health, and public causes earning worldwide recognition for the initiatives we have made in these fields.

1. EHS&S Expectations

MEGlobal Management Team is committed to our EHS&S Expectations and all employees are asked to commit to them as well.

- **I commit to EHS&S as the number one priority for MEGlobal.**
- **I believe that ZERO EHS&S incidents are achievable. I accept that all EHS&S incidents are preventable, and I will do what it takes to eliminate them.**
- **I own the EHS&S program.**
- **I am accountable for my health and safety and my ability to do work.**
- **I comply with all policies, standards, guidelines, procedures, and regulatory requirements 100% of the time.**
- **I comply with all requirements for cybersecurity, physical security, and intellectual property security.**
- **I positively intervene to correct and reinforce safe behaviors through the Behavior Based Safety Program. I welcome intervention from my colleagues.**
- **I report all EHS&S incidents and participate in the investigations.**
- **I pro-actively identify all EHS&S issues and commit to ensuring their resolution.**
- **I educate myself in all EHS&S tools and information that I need to do my role. I share all EHS&S solutions and learnings.**
- **I think EHS&S incident FREE! I think about what I am doing before I do it, while I do it and after I have done it.**
- **IF I DON'T KNOW, I WILL ASK.**
- **I Commit to the EHS&S Expectations.**

Individual Expectations

As individuals, we are expected to perform a job only if we can manage the risks associated with it. We are expected to know, understand, and apply all EH&S policies, standards, guidelines, and procedures as they apply to our individual job. Personal responsibility and accountability is the cornerstone of safe behavior.

We assume personal responsibility and accountability by:

- Wearing the specified personal protective equipment, in the correct manner, at all times.
- Practicing Leadership and Engagement Principles
- Assessing the hazards of the job before starting any assignment and developing plans that will enable the work to be completed safely, with minimal environmental impact.
- Actively participating in the Behavior-Based Performance (BBP) Process to proactively intervene to correct and reinforce safe behaviors.
- Promptly reporting all EHS&S incidents, near misses, and unsafe conditions and participating in the investigations.
- Reviewing and ensuring the effectiveness of appropriate procedures and permits.
- Selecting the correct tools, inspecting, and using them safely.
- Maintaining good housekeeping in our work area.
- Knowing and working within our own physical limitations.
- Not committing unsafe acts.
- Completing all mandatory safety training on time.

- Participating in safety meetings when on site.
- Reporting and managing situations that affect our ability to do the job.
- Notifying Leaders and/or Designated Representatives before starting work, when an off-the-job condition could be aggravated by a work assignment.

2. Organization, Roles and Responsibilities

The following people/roles will be the focal points to assist with implementing programs, procedures, disciplines, etc., associated with this plan.

MEGlobal team members will be responsible for interfacing with outside contractor safety personnel and reporting of safety information. Contractors will be responsible for the administration of their own safety programs, which are required to meet or exceed the requirements of local legislation and the site where work is taking place.

MEGlobal EH&S Team members are:

Abdulqader Al-Qabandi	EH&S NA Leader
Mandy Meador	EH&S Manager
Jared Brown	EH&S Technician – Oyster Creek
David Cruz	ES&S Specialist – Oyster Creek
Ray Leckie	EH&S Technician – Fort Saskatchewan
Deanna Fedyniak	EH&S Technician – Fort Saskatchewan
Tanya White	EH&S Technician – Prentiss
Dwayne Rowley	EH&S Technician – Prentiss

3. ZERO Incidents Program & Vision

MEGlobal shall at all times, provide MEGlobal personnel and Contractors a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to employees. This is a shared responsibility by all Contractors performing services at MEGlobal.

Every Contractor shall strive to achieve a workplace that is 100% SAFE, 100% OF THE TIME, where the workplace conditions and behaviors empower a safety conscious atmosphere that protect PEOPLE, ENVIRONMENT and PLANT EQUIPMENT. In order to meet these goals, Contractor shall always maintain 100% compliance with MEGlobal EH&S Standards and Procedures. The EH&S goal for the MEGlobal is **ZERO Incidents.**

ZERO Incidents Goals:

- Zero (0) Work-related illnesses or injuries
- Zero (0) Environmental Impacts or Loss of Primary Containment (LOPC)
- Zero (0) Motor Vehicle Accidents (MVA's) or Motorized Equipment Accidents
- Zero (0) Process Safety Incidents
- Zero (0) Security Incidents

4. Zero Tolerance Policy

Contractor shall have a written ZERO Tolerance Policy which includes Corrective Action. The policy must hold employees, supervision, and Subcontractors accountable for their actions.

Zero Tolerance Policy shall be adhered to by Contractor. The following are examples of Zero Tolerance Policies and include but are not limited to:

- **VIOLATIONS OF LIFE CRITICAL STANDARDS**
- **KNOWING AND WILLFULLY CREATING A LIFE-THREATENING HAZARD W/O SAFETY CONTROLS**
- **POSSESSION OF FIREARMS, WEAPONS OR EXPLOSIVES (includes ammunition and shell casings)**
- **POSSESSION OF UNAPPROVED KNIVES**
- **USE OF KNIVES IN NON-APPROVED AREAS OR FOR NON-APPROVED TASKS (MUST BE MEGLOBAL APPROVED FOR USE AND IN CONJUNCTION WITH REQUIRED PPE FOR TASK)**
- **VIOLATION OF SUBSTANCE ABUSE / CONTRABAND SITE POLICY**
- **THEFT**
- **TERRORISTIC, BOMB, OTHER SIMILAR THREATS OR ACTS OF TERROR**
- **ACTS OF VIOLENCE, PHYSICAL THREATS, HARM / ATTEMPTED PHYSICAL HARM TO OTHERS**
- **SABATOGE TO SAFETY OR OTHER PLANT EQUIPMENT**
- **BYPASSING SAFETY DEVICES**
- **SMOKING IN UNAUTHORIZED AREAS (STRICTLY PROHIBITED INSIDE FENCE / PROCESS AREAS)**
- **ANY OTHER ACT(S) DEEMED AS INTOLERABLE BY MEGLOBAL AND/OR CONTRACTOR**
- **CELL PHONES STRICTLY PROHIBITED INSIDE PROCESS AREAS (MUST HAVE SITE APPROVAL FOR INTRINSICALLY SAFE PHONES ONLY)**
- **CAMERAS STRICTLY PROHIBITED INSIDE PROCESS AREAS WITHOUT CAMERA PASS (CAMERAS MUST BE INTRINSICALLY SAFE WHERE REQUIRED BY MEGLOBAL AND CELL PHONE CAMERAS ARE PROHIBITED)**

5. Recognition and Balance of Consequences (BOC)

Positive safety recognition can play a part in ensuring a safe worksite. The MEGlobal Leadership team has determined safety recognition/awards and milestones.

It is expected that each contractor company has a Balance of Consequences (BOC) process for their acceptable and unacceptable behaviors.

The Contractor shall establish and administrate a Recognition / Reward and Balance of Consequences Program for the Site, which contains Positive BOC *(Reward & Recognition)* and Negative BOC *(Disciplinary Action).*

BOC shall contain (but not limited to):

- **Recognition of Workers**
- **Rewarding of Workers (non-monetary)**
- **Progressive discipline up to and including removal from the job site**

It is the Contractor's responsibility to keep track of all individuals who receive disciplinary action while performing work on MEGlobal site.

A violation of the Zero Tolerance Policy may result in the removal of the individual from the Site immediately.

MEGlobal reserves the right to restrict temporarily or permanently anyone from accessing the Site at any time and without advance notice.

6. Contractor Safety Meetings

MEGlobal has established clear expectations for who will work in and around the field and field offices located at each site. Before any Contractor commences any work activities, MEGlobal and the Contractor shall co-facilitate a Pre-job Safety Meeting. This meeting is designed to provide understanding of MEGlobal's expectation of accomplishing the **Zero Incidents**. Pre-job safety meetings shall not be calculated towards the mandatory weekly safety meetings outlined below.

Pre-Job Safety Meeting: A one-time Pre-Job Safety Meeting will occur with selected Contractors to ensure that they understand the scope of work and support MEGlobal expectations and requirements.

Pre-Job Safety Expectations Meeting: The purpose of Pre-Job Safety Expectation's meetings is to meet with all the workers prior to starting work so that Leadership can share the safety expectations while working in the facility.

Initial Tailgate Safety Meeting(s): Held on the first day, as required, to re-emphasize the Safety Expectations.

Contractor Shift Tailgate Meetings: A shift safety tailgate meeting to discuss and highlight the latest learning and expectations. Purpose is to communicate hazards specific to the start of activities and specific plant area conditions plus any significant near misses.

Contractor Safety Meetings during project execution: The Contractor and MEGlobal Safety Representatives may hold a safety meeting at required intervals. The purpose of this meeting is to review relevant safety topics/statistics and communicate learning.

Contractor Safety Meetings during project planning stage: Safety communication between MEGlobal and Contractor EH&S Representatives is required at agreed upon intervals. The purpose is to communicate any serious concerns, or to evaluate high risk activities to be performed and review safety performance to date.

Day 1 Leadership Meeting: Held on the first day of a planned outage by MEGlobal leadership. The purpose of this meeting is to introduce MEGlobal personnel to the contractors and to communicate leadership expectations.

7. Contractor Requirements – Non-MEGlobal Services

Every Service Contractor company shall have a written ZERO Tolerance Policy which includes Corrective Action. The policy must hold employees, supervision, and Subcontractors accountable for their actions.

Special Contractor process for Independent Contractors including the Special Contractor Flow Chart and Waiver form to be complied with.

The contractor must provide the following information prior to beginning work:

1. Special Contractor process and Waiver form for Subcontractors that do not meet MEGlobal Safety Qualifications.
2. A list of portable equipment that will be brought to the site including intended service.
3. Ensure Contract employees are trained and qualified to operate equipment, and meeting MEGlobal requirements.
4. A written elevated work, fall prevention and fall protection program.

5. JSA/Job procedures specific to field activities
6. Document from the contractor verifying that tools brought onto property have not been altered or modified from the manufacturer's specification.
7. Manual lifting is restricted to 50 lbs. / per person. The path of travel must be inspected prior to manual lifting.

Other than the Subcontractors listed on the MEGlobal ASL, the principal Contractor shall not hire for the specified work/services any Subcontractor without MEGlobal's prior written consent. The principal Contractor shall not employ or continue to employ any Subcontractor rejected by MEGlobal for the specified work/services. Prior to hiring any Subcontractor, the principal Contractor shall provide MEGlobal with the identity of each Subcontractor, the particular services to be performed, health, environmental, safety and accident reports on all reportable incidents for such proposed Subcontractor, and any other information reasonably required or requested by MEGlobal with respect to such Subcontractor.

The principal Contractor shall make available or hire as a Subcontractor all personnel as are required to perform the specified work/services. The principal Contractor shall ensure that personnel shall be appropriately qualified and experienced (including possessing appropriate certifications) in the duties to which they are assigned. The principal Contractor shall retain sole authority, control, and responsibility with respect to labor matters in connection with the performance of the specified work/services regardless of whether such specified work/services are conducted by Subcontractors or the principal Contractor.

Requirements that apply to the use of Subcontractors:

1. The principal Contractor shall use the EH&S performance of its Subcontractors as one of the factors when it pre-qualifies any Subcontractor.
2. The principal Contractor shall pre-qualify any Subcontractor to the same requirements that MEGlobal used to pre-qualify its principal Contractors.
3. The requirements of this standard shall apply to all Subcontractors on site.

Contractor and Subcontractor Qualifications:

No Contractor shall be authorized to mobilize to any MEGlobal site unless their safety performance for the previous three (3) years meets or exceed MEGlobal contactor selection requirements, unless exceptions are made in writing by MEGlobal Site and Global Leadership Team members. All Subcontractors (all tier levels) shall adhere to MEGlobal Contractor selection standards. MEGlobal utilizes ISNetworld to verify Contractor safety performance, Safety Program, and Insurance.

A thorough pre-qualification or **Management System Review** and selection process shall be applied for all Contractors and Subcontractors prior to performing services at the site. ISNetworld will be utilized by MEGlobal for evaluating Contractor safety performance.

Contractor Site Safety Manual (CSSM):

The Contractor Site Safety Manual (CSSM) should be located in ISNetworld and shall support and align with MEGlobal EH&S requirements. It will be each Contractor's responsibility to stay current with the latest revisions and educate their workforce with any revisions to their CSSM.

MEGlobal reserves the right without effect on Contractor cost to prohibit the commencement of work or stop work in progress, when the contractor equipment, personnel or work conditions are considered, at MEGlobal's discretion to be life threatening, not in compliance with regulatory requirements, laws, rules, and/or fall outside MEGlobal's parameters of risk tolerance.

Integrated Team Safety:

Contractor EH&S will be held responsible to work as an integrated team with MEGlobal's EH&S Team and communicate when contractor/plant equipment, work activities or work conditions are unsafe, not in compliance with the Contractor's CSSM or the MEGlobal EH&S requirements.

Tool & Equipment Inspection Programs:

Contractor's CSSM shall have a defined process for the documenting inspections and safe working conditions of all tools and equipment used on site. Should defective tools and equipment be found, they shall be immediately removed and replaced (or properly repaired) prior to continued use.

Security:

Contractors shall comply with the MEGlobal site access and security requirements for the site.

All personnel shall display their MEGlobal security ID badge, so it is visible while on the site.
For safety reasons, workers who are wearing coveralls/tops with their name and Company name are not required to wear their ID badge visibly but must carry it on their person continuously so it can be produced upon request.

Security ID badges are the property of MEGlobal and must be returned when no longer an active employee or service provider with MEGlobal.

Injury Management:

Contractor is responsible for the implementation of Contractor injury management system for workers to ensure they receive standard of care medical attention for work-related illnesses and injuries, while effectively managing the sites Agency reporting requirements. Contractor injury management system must include skilled Contractor Injury/Illness Manager(s) to provide management and oversight of all work-related injuries and illnesses (and those with potential of becoming work- related).

First Aid & Medical Services:

Contractors shall ONLY provide basic first aid treatment to personnel falling under their authority and ONLY for the purpose of stabilizing personnel for a short interim while in transit to receiving evaluation and possible medical attention from an MEGlobal-approved occupational healthcare provider, which may or may not be located on site (e.g., onsite first-aid facility during turnaround / outages).

Reports regarding contractor work-related evaluations, first aid, and medical treatment shall be formally communicated to MEGlobal Leadership and EH&S Team immediately after information is available. Contractor and Preliminary Reports must always be issued by the end of the work shift in which the work-related event occurred or was reported to Contractor.

Medical services (beyond basic first aid treatment) and substance abuse testing shall be managed external to the Site or by an MEGlobal approved onsite drug screening facilitator. The Contractor Company shall utilize an independent Medical Review Officer (MRO) to manage the results of drug tests.

Life Threatening Situations:

In the event of a life-threatening situation, everyone with knowledge of the life-threatening situation has the obligation to stop the work, report the situation to MEGlobal Leadership and participate in the investigation (as needed) to assist with devising a path forward for safe work execution.

Bringing Chemicals Onsite:

Except for those chemicals listed in service agreements, the use by contractors of any other chemicals on MEGlobal Site shall be subject to MEGlobal's prior approval of any such chemicals, and contractor shall provide all requested information (ex. Safety data sheet) regarding any such chemicals for MEGlobal's Site chemical approval process.

Safety Staffing:

Contractor Safety Rep are the initial point of contact for all EH&S issues during work onsite and responsible for ensuring that the contractors are following and safely executing the EH&S expectations as documented. The Safety Rep shall work with MEGlobal and the contractor to resolve safety related concerns. The Safety Rep shall be at the work site when workers are present, and activities are performed. If the Safety Rep leaves the site, the responsibility for this role must be transferred to another qualified Safety Rep onsite.

For contractors with small number of employees each contract company may designate a Contractor Safety Contact. This designated Safety Contact shall be knowledgeable of the contractor's and site EH&S Policies and Procedures.

The expectations of the Contractor Safety Rep & Contacts:

- Attend Facility Leader Orientation/ Expectations
- Maintain a positive attitude towards EH&S by reviewing work plans for EH&S information, recognizing positive safety performance, correcting deficiencies, and communicating learning's. Provide coordination with Contractor & Plant EH&S Management to effectively communicate EH&S information.
- Implementation and management of safety management plans, Job Safety Analysis (JSA), Pretask Analysis (PTA) or similar and/or Job Execution Plan
- Perform audits, observations, interventions, review and analyze findings and report to MEGlobal EH&S Delivery Technician
- Ensure that all events are properly investigated and documented.
- Provide a summary report to MEGlobal EH&S Focal Point as requested.
- All Contractor EH&S Representatives (Contractor EH&S Manager, Field Tech, shall be qualified (through a combination of training and experience) to effectively perform their HSE responsibilities and meet reasonable EH&S expectations as set forth by MEGlobal. Contractor EH&S Representative must possess typical EH&S Managerial skills such as, but not limited to, hazard recognition and mitigation strategies, ability to facilitate comprehensive and educational safety/toolbox meetings, lead incident investigations, determine cause(s) of incidents, provide recommendations and corrective actions to prevent or reduce the likeliness of incidents, technical writing skills, possess excellent verbal and written communication, extensive working knowledge of applicable safety laws and regulations relating to work activities performed by Contractor, and possess the ability and commitment to lead by example, etc.

Contractor Company shall provide a minimum number of Safety Representatives per workers for the Site in accordance with table below.

MEGlobal reserves the right to require additional Contractor Safety Representatives if the Contractor EH&S performance does not meet MEGlobal expectations, with no additional cost to the Site.

The following table shall be utilized on the MEGlobal as a minimum:

Contractor EH&S Representatives	Field Workers
1 (Part-Time EH&S Professional or designee must remain onsite while work is performed)	1 – 9
1 (Part-Time Site EH&S Representative)	10 – 25
2 (1 Full-Time Site EH&S Representative)	26 – 49
3 (2 Full-Time Site EH&S Representatives	50 – 100
One (1) Full-Time EH&S Field Tech shall be added for each increment of 50 Field Workers above 100	

NOTE: In certain cases, for low-risk services and/or smaller work scopes requiring less than 10 Contractor personnel, MEGlobal may grant Contractor permission to provide EH&S support from offsite (e.g. local home office) with the provision that EH&S support must be readily available to Contractor personnel while onsite and able to respond in timely manner for any safety-related event that would require EH&S support.

Contractor Leadership:

Contractor Leadership is expected to show a presence in the field, to lead by example, and to reinforce the safety expectations communicated by Plant Leadership, and Construction Leadership.

Accountability:

All visitors and workers must be accounted for while within the site fence line. Each contractor needs to have an established process in place to account for all their personnel on site in case of an emergency and be able to report in a timely manner. In addition, contractor personnel entering an operating block shall report to the Control Room or Turnaround Permit Trailer and be signed onto a SWP, crew roster or signed into the visitor log in control room.

Sanitation Facilities:

Contractor shall communicate staffing numbers on site to allow MEGlobal to provide the appropriate number of welfare facilities.

Site Material Management Plan:

At no time shall Contractor material be staged on the Site to cause congestion / tripping hazards or coordination issues with other parties at the Site. Material laydown or storage yards shall be utilized for longer duration material storage.

Waste Management:

Contractors shall follow all MEGlobal waste management requirements and must notify MEGlobal of any waste generation that occurs from plant and/or process equipment and from buildings onsite. All waste generated at MEGlobal sites must be collected in approved containers, properly labeled, and stored at approved storage locations. Waste shall be disposed of only through accredited third parties approved by MEGlobal. Contractors shall contact their MEGlobal site representative for additional information on site-specific waste requirements.

Each external contractor or third-party service provider used to recycle, reclaim, treat or dispose of waste or wastewater is reviewed and approved by MEGlobal. Reviews are conducted on a site level. MEGlobal Fort Saskatchewan must follow the requirements of Dow Chemical Company as they are the environmental operating approval holder onsite.

Facility Eyewash Stations:

All Contractor usage of portable eyewash stations must be coordinated with MEGlobal job rep or EH&S department. Any use of the portable eyewash station must be immediately reported to MEGlobal and Contractor as per the incident reporting process.

Fire Extinguishers:

All fire extinguishers shall be inspected and certified annually by a qualified party and condition shall be in accordance with local fire codes. Contractor fire extinguishers shall also be visually inspected on a monthly basis with inspection records maintained of the visual inspection.

Stop the Drop:

Dropped objects are a common cause of workplace injuries and property damage. The consequences of any materials, tools, or equipment falling from elevation may result in serious injuries to workers or damage to equipment.

Whenever there is work at elevation, stop, and identify the potential for dropped objects and the hazard control needed for prevention. Good housekeeping is key at all work area's and must always be practiced.

8. At-Risk Workers / Short Service Worker (SSW) Program

This is to address the preparation and management of contract employee(s) with a significantly less experience level prior to releasing them to the field for work. Contractors shall have the responsibility to identify at-risk workers who are new to their craft/trade and/or to MEGlobal. It is the expectation that the contractor has a robust system in place to effectively identify and manage employee(s) with significantly less experience levels within their assigned craft or responsibility. MEGlobal-approved Short Service Worker (SSW) Program shall be implemented and managed by Contractor to ensure workers are safely integrated into their roles at the site.

9. Personal Protective Equipment (PPE) and Dress Code

Contractor shall ensure correct PPE for tasks being performed, in effective working condition is worn by workers under their authority. Contractor shall always eliminate hazards, when possible, with PPE remaining as the last line of defense.

Hardhats:

Hardhats shall be properly selected by correct classification hardhats to ensure correct level of protection is provided against anticipated hazard(s) and replaced per manufacturer's replacement schedule.

Metal hardhats are not permitted on Site and "bump" caps must be authorized in writing by the MEGlobal and Contractor.

Rescue Companies as well as Rope Access companies are permitted to wear a climbing and rope access helmet with chin strap.

Gloves:

Contractor personnel and Contractor visitors shall wear appropriate hand protection for the task(s) performed, worn while inside process areas, and while occupying areas which introduces potential hand hazards and/or contamination.

Each work activity requires a specific type of glove designed to protect against specific hazards. Anyone performing work activities shall wear the correct gloves to adequately protect them from the potential hazard.

Safety Glasses:

Tinted protective safety glasses may be used during day light hours only – between the hours of thirty (30) minutes after sunup and thirty (30) minutes before sundown. No dark tinted protective safety glasses shall be allowed inside buildings, MCC, tanks, vessels, or other poorly lit areas. Only clear or 50/50 (light tint) protective safety glasses shall be used within these areas.

Safety Glasses with side-shields must be worn under welding hoods or face-shields, depending on the task being performed.

ANSI Z87+ / CSA Z94.3 approved, and stamped eyewear shall be wrap around style eyewear. Prescription safety glasses must have side shields or be the wrap around style of safety glasses and must also be ANSI Z87+ / CSA Z94.3 approved and stamped. Any exemptions from the types of eyewear listed needs to be approved by the MEGlobal EH&S Delivery Department.

Sealed eye wear or monogoggles may be required depending on specific tasks or work conditions.

Safety Shoes:

Safety-toed (composite or steel) boots shall be worn while in operating areas and areas located outside administration areas and shall be in good wearing condition (no exposed steel, slick soles, etc.).

Additional PPE:

Additional PPE may be required for task-specific work and may include the following:

Antistatic Clothing, face-shields, sealed eyewear, personal fall protection, respiratory protection, chemical protection, specialized or double hearing protection, etc.

FRC / Clothing Policy:

Fire Resistant Clothing (FRC), long sleeves and pants shall be worn in operating areas and other areas required by MEGlobal.

Long pants and sleeves, at minimum shall be required for all work activities performed outside FRC- required areas.

High Visibility Vests:

Fluorescent colored high visibility vests (FRC if needed) shall be used for identification of Spotters, Flagmen, Safety Attendants, Fire Watches, etc.

Face-Shields:

In addition to ANSI Z87+ / CSA Z94.3 approved and stamped safety glasses with side shields or chemical goggles (or “spoggles”), ANSI Z87+ / CSA Z94.3 approved, and stamped face-shield is required while performing any activity, or while in close proximity of any activity which creates potential flying objects, debris, or liquids.

Hearing Protection:

Hearing protection is required in all operating areas, and all areas above 85 dBA, including but not limited to operation, maintenance shops and fabrication areas. Double hearing protection shall be utilized for any task or situation exposing a worker to a noise level greater than 102 dBA. Contractor shall ensure company Hearing

Conservation Program is effectively implemented at the Site.

Fall protection:

Fall protection is required when there is the potential for workers to fall from elevation or work over dangerous equipment and other hazards where the danger of falling into or onto the hazard exists, regardless of height, and must be maintained 100% of the time. The distance is measured from the lowest part of the body when the person is standing or sitting.

Tie off requirements are as follows:

Alberta: Any work where personnel are working within six (6) feet of a six (6) foot or greater fall.

Texas: Any work where personnel are working within six (6) feet of a four (4) foot or greater fall.

Fall protection is not mandatory while working on permanent or complete structures, and within complete guardrail systems meeting regulatory load requirements.

The primary personal fall arrest system shall be a full body harness with shock absorbing lanyard(s). Only approved safety lanyards with double locking snap hooks and built-in shock absorbers shall be used.

Personnel shall be trained in the correct use of each specific fall protection or fall arrest system they will be using. The Contractor shall be responsible for the proper selection and maintenance of these safety devices.

All forms of fall protection must be inspected prior to each use and receive documented inspections by a competent person on frequency recommended by the manufacturer, Contractor or MEGlobal, whichever is the most stringent.

Jewelry:

Bracelets, exposed piercings other than stud type, and rings that are not silicone will not be allowed in operating areas, or while performing work. Necklaces shall be tucked inside clothing while performing work around rotating equipment.

Watches and medical identification bracelets are authorized in operating areas and while performing work, unless they present a hazard. Metal jewelry shall not be worn while performing electrical work (energized or non-energized).

Hair:

Hair that is longer than shoulder length (including facial hair) must be secured in a manner that will not interfere with rotating equipment.

10. Safety Training

All Contractor personnel, including visitors, vendors, and suppliers shall complete the MEGlobal Orientation prior to performing service at the site.

Safety training required for all workers (as applicable to job duties and work environment), and the contract companies must ensure that all employees are trained in their craft, the use of PPE, and for the tools they will be utilizing.

The contracting company shall make employee training information available for review. The acceptable form of this information will be in a spreadsheet or employee training matrix. MEGlobal site specific training is as follows:

Fort Saskatchewan:

- MEGlobal Leadership Expectations
- MEGlobal EH&S Standards Indoctrination
    - Explosimeter Overview
    - Safety Attendant Overview

Prentiss:

- MEGlobal Leadership Expectations
- MEGlobal EH&S Standards Indoctrination
    - Explosimeter Overview
    - Safety Attendant Overview

Oyster Creek:

MEGlobal An EQUATE Company	MEGlobal Site Minimum Requirements			
PERSONNEL TYPE	MEG OC Visitor Orientation	MEG OC EHS&S Orientation	Negative Hair Folicle Drug Screen	Succesful Background Screening ≤ 2
Visitor	Required	N/A	N/A	N/A
Delivery	Required	N/A	N/A	N/A
Admin Only (Administrative assistants, HR, Finance, not to enter process areas)	N/A	Required	Required	Required
MEGlobal, EQUATE, and Contingent Staff		Required	Required	Required
Service Provider (Nested and Non- Nested Contractror)	N/A	Required	Required	Required
Tenant	N/A	Required	Required	Required
Tenant Service Provider (Provides Contract Services for Tenant Only)	N/A	Required	Required	Required

Contractors are responsible for training their workers in accordance with all applicable Federal and State mandated training requirements in addition to contract and site requirements.

11. Electronic Devices

Cellular phones, digital media entertainment devices (iPod, MP3, etc….) are not allowed within the process unit, turnaround areas or designated fab area's even in the off position. During turnarounds, the conditions of the area are subject to change and the safety of the work must be determined accordingly.

All intrinsically safe devices must have a label or other documentation available for audit purposes and must be approved for use by Facility Leadership prior to use.

12. Emergency Response Plan (ERP)

MEGlobal Emergency Response Plan (ERP) shall be adhered to by Contractor. The MEGlobal ERP will include security procedures that must be adhered to by Contractor.

Within the site fence line, site ES&S is always the First Responder. All events or incidents within the site fence line shall be reported immediately to the Facility Operator / EHS&S / Turnaround Manager / delegate by radio, phone, emergency pull box or in person. Facility Operations / Owner will contact Emergency Services & Security for additional support as required.

In the event that a warning is given to "evacuate", the Contractors shall immediately shut down their equipment and all their personnel shall leave the area as instructed by Operations/Facility Owner representative.

13. Job Safety Analysis (JSA) / Pre - Task Hazard Analysis (PTHA) or Equivalent

A Job Safety Analysis (JSA) will be created by a team of Contractor personnel specific to the work to be performed. The JSA is a high-level overview of the work including job steps from start to finish that defines the work being performed, hazards for each step and actions to control, reduce or eliminate the hazards. The JSA may be performed for a craft or a specific job and will be referenced by the supervisor when completing the JSA. All crew members must review the JSA associated with their work and sign it.

The JSA is the daily process of identifying and communicating to each employee the task steps to be completed, the hazards and risks associated with the task, and the safe work practices that are to be applied to complete the task safely and in an environmentally acceptable manner. The JSA process includes pre- task planning, hazard identification and correction, supervisor, and employee accountability.

The Contractor shall ensure daily toolbox meetings are being facilitated by the supervisors (e.g. Foreman) to their respective work crew. Average toolbox meeting duration is ten (10) to fifteen (15) minutes where the JSA will be reviewed with the crew and documented on the JSA along with communication of other safety and related information.

If the task, hazards, or scope changes during the shift, the JSA must be updated to reflect the changes and reviewed with affected (or potentially affected personnel). New members joining a crew during the day must review and sign onto the JSA for that crew's activities.
Contractors may be required to complete a SHEL review upon MEGlobal request.

14. Heat & Cold Stress Severe Weather

The Contractor will have a procedure/policy governing work in situations of extreme weather. In addition, the contractor will comply with site recommendation during severe weather alerts including extreme cold, snow/ice management and intense lightening. Site Security / Operations will be responsible for conveying site weather alerts.

AB MEGlobal follows Thor Guard system and/or Environment Canada's recommendation of the "30/30" rule for intense lightening.
Texas MEGlobal utilizes the Weather Century system for weather alerts and 6-mile / 10-mile detection for lightening.

Thermal Stress (Heat/Cold) 06.05 applies to extreme cold and hot weather and Snow and Ice Management Policy describes requirements for managing ice slipping hazards.

Contractor shall develop an inclement weather plan related to services being performed at the site. A primary purpose of the inclement weather plan will be the safe securing of Contractor equipment and safe evacuation of Contractor personnel in advance of weather forecasted to impact the Site. The plan shall also include a mechanism for communicating safe return to work to Contractor personnel.

The Contractor shall develop a thermal stress management plan. This plan shall address the work, condition, and controls to safely manage work activities during extreme temperatures throughout the year for both heat and cold stress.

15. Industrial Hygiene

Industrial hygiene is an important part of personnel protection. Some key requirements:

- No eating or drinking is allowed outside of welfare areas. Water is only allowed outside of welfare areas at locations that have been approved by Facility Leadership.
- It is recommended that every employee thoroughly wash their hands with soap and water prior to eating/drinking during lunch or breaks.
- Do not bring contaminated PPE, tools, etc., into break areas which include putting hard hats or gloves on lunch tables.

Hearing Protection

The Contractor will have a Hearing conservation program. All personnel working in the facility will comply with the site Hearing Conservation Program. The site IH coordinator, or the MEGlobal EHS Department may elect to conduct a noise survey of the worksite from time to time.

Respiratory Protection – Employees required to wear respirators will be given a medical evaluation prior to fit testing to determine if they are medically able to wear a respirator. Each employee has the responsibility to wear his or her respirator when and where required and in the manner in which they were trained.

After the medical evaluation is completed, employees medically cleared to wear a respirator will be fit tested. Fit testing will be done by a third-party service provider. Employees must use their respirators in accordance with the training they receive.

16. Foremen Ratios

Foreman to crew ratios will be maintained at one (1) foreman to a maximum of ten (10) workers for each crew unless otherwise approved by the MEGlobal.

17. Housekeeping

Orderliness is a basic requirement for all jobs and must be maintained at all times.

Housekeeping expectations are:

- Zero loose trash
- Zero obstructed walkways
- All tools organized and stored safely
- Minimize material staging
- Clean work site
- Professional work environment
- All tools, and PPE to be stored appropriately at the end of each shift.

Housekeeping is a basic job performance expectation of everyone in the facility.

Good housekeeping is visible evidence of the attention paid to health, safety, and environmental aspects on a day-to-day basis.

Your housekeeping performance is a direct reflection of your attitude towards safety and respect for the facility.

All hoses, cords, welding leads and temporary tubing should be routed out of potential employee traffic patterns and paths, routed overhead or have walkover/rollover protection in place to minimize the tripping and damage potential.

SWP Issuers and SWP Acceptors are responsible for maintaining the housekeeping agreement that is documented in the SWP.

Areas with unacceptable housekeeping will be evaluated and persons may be directed to make areas acceptable prior to other work commencing. Coaching will be applied to operations staff and contractor leadership who do not fulfill housekeeping obligations and expectations.

18. Safety Inspections

Leading by example involves Leadership visibility and support at the Site.

Safety inspections shall be performed by Contractor on a weekly basis at minimum.

Contractor Safety Inspection Objectives:

- Perform interventions as needed
- Provide positive reinforcement to promote safe behaviors
- Gather feedback from workers
- Document findings for communication, trending, and follow-up

In addition, the Contractor will have a field safety inspection/assessment program that consists of additional documented inspections. The schedule designates individuals performing the inspection/assessment and the area/process to be assessed. The results of the inspections/assessments along with corrective actions will be tracked.

19. Safety Observations / Near Miss Prevention

Observation & Intervention - Contractor shall implement an effective Safety Observation Program that involves supervision and field workers. Safety observations shall be performed on a routine and frequent basis, with the findings communicated to MEGlobal.

Items to consider are proper PTA card use, hazard (LOF) identification, PPE, SWP, Housekeeping, etc. Upon the actual observation, an observer will examine the original permit and observe the worker(s), making sure the permit and unit guidelines are followed. Any safe behaviors or deficiencies should be immediately communicated with the person observed and also be communicated to the Contractor EH&S Technician. Additionally, it is important that the MEGlobal EH&S representative be made aware of any deficiencies so that he/she may initiate the coaching and corrective measures. Emphasis shall be placed on positive observations and improvement observations and reviewed with Contractor workforce through safety flyers, toolbox meetings, safety meetings, etc.

Significant Near Miss Observations – These observations are targeted toward identifying and correcting unsafe conditions and/or practices and require MEGlobal follow up / intervention.

Escalation is the key to resolution. All unresolved near misses must be communicated to the company's

Supervisor immediately.

All near miss/observation reports are to be reported to MEGlobal as soon as practical and certainly before the end of the shift.

The Contractor may use the MEGlobal form or their own.

20. Barricades / Flagging

Barricades must be placed in work area if the work presents a hazard to others. This includes floor openings where it is infeasible to safely cover (hard barricades must be used), working in the line of fire with possibility of falling objects, excavations, flying debris, respiratory hazards, and other similar situations.

The following colors of barricade tape will be utilized on Site. Additional types of barricade colors and materials may be used with MEGlobal review. An effort will be made to minimize the use of barricade / flagging tape and utilize hard barricades as much as possible.

- **Red barricade tape will be used to denote "Danger" – Do Not Enter / Authorized Personnel Only.**
- **Yellow barricade tape will be used to denote "Caution" – Enter with Caution, Observe for hazards.**

All barricades are required to have tags on all sides denoting the reason for barricade, company that owns the barricade, method of contact, and date.

21. Life Critical Standards

It should be understood that while MEGlobal EH&S Standards are fundamentally sound and comprehensive in nature, they may not represent all requirements that may be imposed upon a MEGlobal Site or Plant. *When more stringent Government, local regulations, national codes/standards, or Contractor Policies exist, these shall be used.*

The following eight standards have been designated ***Life Critical*** because they are considered ***most important for worker protection.*** *The following is only an overview of site's Life Critical Standards. Each person is required to understand the MEGlobal Safety Standards applicable to their specific task(s).*

Life Critical Standards involve higher risk activities that if not managed safely, could lead to serious injury or death. **Life Critical Standard** violations are considered severe at-risk violations, requiring a formal Root Cause Investigation (RCI) and in many cases are terminable offenses.

Life Critical Standards are as follows (may be modified per MEGlobal discretion):

1. Confined Space Entry Standard

All Confined space entries will require a safe work permit, a confined space entry permit, and a confined space entry procedure. All personnel involved in the entry must be present for the Confined space entry meeting, to review the entry procedure. All additional requirements of the Confined Space Entry Standard requirements must be met.

2. Electrical Standard

All electrical work performed will comply with the MEGlobal Electrical Safe Work Standard. The purpose of this standard is to protect people from accidental exposure to electrical shock, arc/flash burns and other hazards associated with electrical work. The standard concentrates on personal interactions with electricity and not on equipment specifications.

3. Elevated Work Standard

To reduce the potential for falls from elevation, jobs requiring elevated work which are subject to associated fall hazards shall comply with the requirements of the MEGlobal Elevated Work Standard.

4. Hot Work Standard

To reduce the potential for the ignition of a flammable gas release all work shall identify the appropriate Hazardous Area Classification. These area classifications are to be enforced and any electrical equipment or hot work equipment used shall meet the requirement for the area of use. High Energy Hot Work (HEHW) in or adjacent to areas that are classified /flammable require a HEHW permit. All hot work shall be done in compliance with MEGlobal Hot Work Standard.

5. Hydro-blasting and Pressure Washing (HBPW) Standard

All Hydroblasting and Pressure Washing must be permitted by operations. The purpose of the standard is intended to assist with the implementation of these requirements and to serve as a reference for any questions that may arise, and to prevent personal injury, or damage to equipment. This document also references tools, templates and procedures that are used to meet these requirements. All HBPW shall be completed in compliance MEGlobal HBPW Standard.

6. Isolation of Energy (IOE) Standard

The purpose of this standard is to prevent injury to personnel by prohibiting the operation of isolating devices through the use of Red Tags to guard against the unexpected, inadvertent, or accidental release of energy. To prevent the release of materials that could lead to injury of personnel. All IOE work shall be in compliance with the MEGlobal Isolation of Energy Sources Standard (Red Tag).

7. Line and Equipment Opening (LEO) Standard

The purpose of this standard is to prevent leaks, personal injury, and exposures that may result from opening lines and equipment. All line and equipment openings shall be in compliance with the LE&O Standard.

8. Safe Work Permit (SWP) Standard

Daily safe work permits will be required for all work that is not exempt. Upon completion of the work, or at shift end if the task was not completed, the permit shall be returned to the issuing office and closed out. The Permit Issuer must ensure the person who received the Safe Work Permit understands the requirements of the permit. All permitted work performed shall be in compliance with the MEGlobal Safe Work Permit Standard. Contractor shall provide competent SWP Acceptors, who shall receive MEGlobal Permit Acceptor training and be able to provide training credentials upon request.

The person accepting the SWP is expected to:

- Understand area hazards, equipment and work and the safeguards in place
- Understand and follow PPE requirements
- Have the necessary skills and knowledge to do the permitted work safely
- Know emergency procedures, alarms, and assembly points
- Know the location of and how to use emergency equipment
- Know the scope of other work that could impact this work
- Understand the scope of this permitted work
- Understand the housekeeping requirements
- Have been through all indoctrination process'
- Have inspected all tools, equipment, scaffolding prior to use
- Will complete a pre-job hazard assessment

- Closeout communication at the end of shift or end of the authorized task is required for each type of authorized work activity.

22. Crane Work

The design, operation, and maintenance of cranes, hoists, and lifting devices shall meet several requirements.

All Crane Operators shall be trained, certified and exhibit the ability to safely operate the specific make and model crane the operator will operate.

Lifts with an unusual or unique set of hazards and / or complexity may require additional advance notification prior to the lift being performed. This will allow proper review and actions prior to the lift.

All critical lifts will have a critical lift procedure reviewed by MEGlobal and Contractor for safe planning and execution before critical lift permits and operations are executed.

Rigging inspection: It is the responsibility of the Contractor to ensure that all rigging and components are not damaged and is ready for use. All rigging and components are to be inspected on a regular basis, labeled with "due dates", and be documented. Any defective rigging shall be immediately removed from service and either destroyed or removed from the site. Inspections must be done by a competent individual(s). The use and inspection of rigging shall be in compliance with the manufacturer's instructions.

See the Overhead Hoists and Cranes (TX Only), Hoists and Lifting Devices, Part 06 (AB Only) for Critical Crane Lift Requirements.

23. Excavating and Tunneling

All excavating, drilling, coring and cutting shall be done in accordance of the MEGlobal Excavation Standard. This standard defines the minimum requirements for excavating and tunneling.
This standard covers the site requirements for:

- Planning and engineering for any excavation, and
- Permitting for any excavation.

Definitions

Excavation: Any sub-surface disturbance (ground disturbance or ground penetration) including but not limited to sub-surface digging, boring, piling, drilling, tunneling, driving stakes into the ground.

Hand Digging: Excavation to expose to sight, using hand tools or hand-held equipment that depends on the energy of the worker for its direct effect, and that will not cause damage to an underground facility if contacted.

Locating: A method of identifying and marking the location of buried or concrete or concrete embedded facilities shall include use of electronic scanning or other devices.

Non-destructive Excavating: "pneumatic" excavation and "hydro-vac excavation" can be non-destructive techniques for excavating, depending on the robustness of any buried installations. These techniques may be acceptable alternatives to hand-digging, upon approval of the owner of the buried installation.

Hydrovac Excavating: "hydro-vac excavation"; a method to excavate using a combination of a waterjet / water stream and a vacuum truck.

24. Tobacco Products Policy

(AB Only) Site personnel, suppliers and visitors shall smoke in designated areas only. These areas shall be conspicuously identified with signage.

(TX Only) Oyster Creek is a tobacco free site. There is no smoking, vaping, dipping, etc. anywhere onsite. This includes in the parking lots and roadways outside the fence line.

25. Incident Reporting and Recordkeeping

The Contractor shall establish and maintain the following records:

- Site Work Hours
- Incident Log
- Motor Vehicle Accidents (MVA)
- Near Miss Log
- Precautionary employee evaluations
- First Aid Log
- Recordable Log

All incidents involving the contractor, including injuries, accidents, and spills will be reported immediately to the control room / permit trailer, Safe Work Permit Issuer, Job Representative, and MEGlobal EH&S immediately when discovered.

Contractor site Management shall:

1. In case of any & all incidents, quickly as possible, notify the following by phone, in person, or plant pager (if available):
   - Facility Operations / Owner who issued the permit
   - EH&S
   - Health Centre **(AB Only)** if it is an injury or illness
2. Stop all applicable work, and immediately start an investigation as per corporate policies. The work area of the incident is to be "frozen" so accurate information can be gathered. Notwithstanding the above, necessary actions can take place in the effort to aid an injured person or remove an unsafe condition. Work cannot resume without approval from the Facility Leader or delegate.
3. A preliminary report from the Contractor shall be forwarded to the EH&S Manager or delegate as soon as practical but no later than 24 hours after incident. The Preliminary Investigation Report to MEGlobal representative shall include the following: Incident Facts; Root Cause; Action taken to correct or resolve incident; Plan to communicate to all employee's

MEGlobal Work Group / Job Rep will notify Production Leader, EH&S department, Turnaround Manager, and others as applicable.
A preliminary report (first report of incident) shall be provided to MEGlobal Site Leadership by the end of shift, following an incident.
The report shall include but not be limited to the following: names, date, time, location, and description (summary) of incident, and immediate actions taken.

26. Root Cause Investigation (RCI)

Root Cause Investigations (RCI) shall be facilitated by the Contractor for:

- All First Aid Injuries
- All Incidents Involving Damage to Plant Equipment
- All Motor Vehicle Accidents
- All Near Miss with potential high risks
- All Environmental Incidents
- All Equipment Incidents

- Recordable Injuries
- Violation of Life Critical Standards

The Final RCI shall be completed within 5 working days of the incident. The final report shall include the following details of the event:

- Copy of the permit and/or procedure
- PTA
- Pictures/drawing of the incident
- Training
- RCI Flow chart
- Corrective actions and BOC's if applicable
- Key learnings from the event.

This report shall be submitted on company template or may request MEGlobal to send a generic template if the company does not have one. Completed packet shall be submitted to MEGlobal EH&S for review prior to sending to the Leadership Team for review.

27. Safe Working Conditions & Acknowledgement

On a regular and frequent basis and prior to the commencement of work, the Contractor shall inspect the site and ensure all work is safely planned and executed. Contractor shall mitigate in a timely manner, any unsafe conditions observed which fall under the control of Contractor. Any unsafe conditions observed by Contractor which fall outside the control of Contractor shall immediately be reported to MEGlobal Job Rep or EH&S for resolution.

Contractor acknowledges this document was created for the purpose of communicating the very basic MEGlobal EH&S requirements and is not an all-inclusive document for delivering all the EH&S requirements while performing work at MEGlobal.

Contractor further acknowledges to utilize this document for any EH&S clarification requests that may be needed prior to completing RFQ process.

Revision History

The following information documents at least the last 3 changes to this document, with all the changes listed for the last 6 months.

DATE	*REVISED BY*	*CHANGES*
12/04/2023	M. Meador	*Created document for streamline of North America EHS policies*
1/13/2025	M. Meador	Updated TX tobacco policy, and OC site training requirements
2/01/2025	M. Meador	Updated Waste Management

APPENDIX A

MEGlobal Oyster Creek Substance Abuse Program and Criminal History Guideline Matrix

Substance Abuse Program

Contractor shall implement a MEGlobal-approved Substance Abuse Program. Contractor shall consistently implement Substance Abuse Program for all Contractor and Subcontractors personnel (i.e. drug cut-off levels, confirmation levels, provisions of MRO, specimen sample, random, for cause/suspicion, post-incident protocols, etc.).

Pre-access drug screening:

The following Pre-access drug screening is required to access MEGlobal America's:

- Employee must have a valid negative hair follicle test (5 panel minimum) that is valid within the previous 6 months.
- For DOT area access a negative hair follicle test (5 panel minimum), negative DOT UA and negative DOT alcohol testing (BAT) with a result of 0.00 is required. Test must be valid within the previous 6 months and employee currently on the DOT random list.

Random drug screening:

Hair follicle testing (5 panel minimum) with hair follicle sample submitted to a laboratory with negative results confirmation, in conjunction with breath alcohol testing (BAT) with a result of 0.00. If working in the site DOT area, employee must be active on the DOT random drug and alcohol screening.

Post Incident, for cause/suspicion drug screening:

Urine analysis drug testing (10 panel minimum) with urine sample submitted to a laboratory with negative results confirmation, in conjunction with breath alcohol testing (BAT) with a result of 0.00

Background (Criminal History) Screening:

Background verification screenings dating back seven (7) years shall be required for all personnel performing unescorted work on the Site. Refer below for requirements.

Background Screening

MEGlobal Oyster Creek will not grant entry badge to anyone for having convictions for the following for the designated time frame. Convictions for offenses are still counted as convictions when the person received probation, deferred adjudication, or a no contest plea was entered and some criteria must be completed before final disposition is made.

1. A conviction of any Higher Felony within the last seven (7) years. (See list of Higher Felonies below)
2. A conviction for any Lesser Felony within the last five (5) years. (Any felony not included on the list of Higher Felonies)
3. More than two (2) convictions for violent misdemeanors within the last five (5) years. (See list of violent misdemeanors below)
4. More than two (2) convictions for drug-related misdemeanors within last five (5) years.

5. More than two (2) convictions for misdemeanor theft within last five (5) years.
6. More than two (2) convictions for any combination of items 3, 4, and 5 within last five (5) years.

List of Higher Felonies

- Transportation security incident (i.e. Security incident involving a significant loss of life, environmental damage, transportation system disruption, or economic disruption)
- Aiding others in terrorism
- Aircraft piracy outside the special aircraft jurisdiction of the United States, 49 U.S.C. 46502*
- Arson
- Assault (including aggravated and/or sexual)
- Battery
- Bribery
- Burglary (breaking and entering)
- Carjacking
- Carrying a weapon or explosive aboard aircraft, 49 U.S.C. 46505*
- Commission of certain crimes aboard aircraft in flight, 49 U.S.C. 46506*
- Computer crimes (hacking, fraud, damage to property)
- Conveying false information and threats, 49 U.S.C. 46507*
- Credit card fraud
- Criminal anarchy
- Denied or removed under the Immigration And Nationality Act (8 U.S.C. 1182 Et Seq)*
- Kidnapping
- Lighting violations involving transporting controlled substances, 49 U.S.C. 46315*
- Misprision of treason
- Monetary instrument abuse
- Perjury and false swearing
- Purse snatching
- Racketeering and RICO violations
- Rape
- Robbery
- Sedition
- Sex crimes
- Smuggling
- Tax evasion
- Destruction of an aircraft or aircraft facility, 18 U.S.C. 32*
- Drug offenses
- Embezzlement
- Espionage
- Explosive offenses (devices, fake explosive devices, incendiary devices, dangerous articles, importation, manufacture, distribution, storage)
- Extortion
- False imprisonment – armed or hostage taking
- False personating (peace officer, public official)
- Forgery and counterfeiting
- Fraud (including dishonesty and misrepresentation)
- Homicide / murder / manslaughter / including solicitation to murder (excluding negligent manslaughter)
- Identity theft
- Immigration violations
- Improper transportation of a hazardous material, 49 U.S.C. 46312*
- Interference with air navigation, 49 U.S.C. 46308*

- Interference with flight crew members or flight attendants, 49 U.S.C. 46504*
- Terrorism
- Theft-larceny (including felony shoplifting)
- Treason
- Unlawful entry into an aircraft or airport area that serves air carriers or foreign air carriers, contrary to established security requirements, 49 U.S.C. 46314*
- Weapons (any offense-carrying a concealed weapon, weapon on premises, illegal use, manufacture, store, sell, distribute, discharge, etc.)

Violent Misdemeanor Crimes (02)

- Assault
- Battery
- Bodily Injury
- Cruelty to a Juvenile
- Deadly Conduct
- Disorderly Person
- Escape
- Harassment
- Resisting arrest
- Resisting Public Officer
- Robbery
- Terrorism Threats
- Throwing a deadly missile
- Violation of a restraining order
- Weapon

GRADING SCALE

When conducting employer criminal background checks, DISA uses a grading scale ranging from 0 to 7 with each number corresponding to a category of offenses as it pertains to the consortium (site access) background orders. This grade will only be known by the employee, his or her employer, and the TPA performing the criminal history screen.
Background screen grade definitions are as follows:

Grade	Offense Category	
0	Clear record, nothing was found.	All Clear
1	One or more non-violent misdemeanors were found. This includes any misdemeanor not shown on the list of violent misdemeanors.	Requires Review
2	One or more “violent misdemeanors” were found.	Unacceptable if within 5 years or less
3	One or more “lesser felonies” were found. This includes any felony not shown on the list of higher felonies (05).	Unacceptable if within 5 years or less
4	One or more “violent misdemeanors” and one or more “lesser felonies” were found.	Unacceptable if within 5 years or less
5	One or more “higher felonies” were found.	Unacceptable if within 7 years or less
6	One or more “higher felonies” and one or more “violent misdemeanors” were found.	Unacceptable if within 7 years or less
7	The person was found to be on the current Patriot Act List (specially designated nationals, terrorists, narcotics traffickers, blocked persons, etc.).	Unacceptable

- Traffic offenses i.e., traffic homicide, hit and run (excluding DWI/DUI convictions)