



**CARGILL CONTRACTOR  
EHS REQUIREMENTS**

***A Manual for Contractor Companies***





# CARGILL CONTRACTOR SAFETY REQUIREMENTS

(A Manual for Contractor Companies)

Revision Date:  
12/2020

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## INTRODUCTION

Cargill is committed to ZERO Harm by being the leader in nourishing the world in a safe, responsible and sustainable way. ZERO Harm is achieved by focusing on Serious and Life-Altering Injury and Fatality Elimination (LIFE) by identifying and eliminating life-threatening dangers hidden in our tasks and workplace. Therefore, Cargill, Contractors and their employees, subcontractors, and agents are expected to adhere to the minimum requirements defined in the Cargill Contractor Environmental Health and Safety (EHS) requirements document. The intent of this document is to provide basic EHS requirements for all contractors, identify high hazard activities and eliminate/mitigate risk.

Acceptance of the Cargill EHS requirements by the Contractor does not state that

- Cargill is responsible for the workplace safety of the Contractor’s employees and subcontractor employees.
- Cargill provides means, methods, techniques, procedures or equipment required for your company to perform the work that your company was hired to perform.

The Contractor is exclusively responsible for establishing effective safe work practices and conditions for its employees. Defining means, methods, and manner in which the work will be performed remains the obligation of the Contractor.

## 1. SCOPE

These EHS requirements are applicable to Contractors and Subcontractors performing work on Cargill sites or on behalf of Cargill. The Contractor is responsible to have its Subcontractors meet these requirements when performing work on Cargill sites.

## 2. CONTRACTOR DEFINITIONS

**Contractor**—an outside party or parties, not employees of Cargill or its subsidiaries, who are hired to perform a previously agreed upon job or series of related jobs (specific projects) for Cargill. A Contractor differs from contract labor employees, who are hired to perform daily plant operations work.

A Contractor must agree that all work will be performed in compliance with all government laws and regulations as well as any other applicable safety standards. When Cargill’s safety requirements exceed government standards, the higher standard will be followed.

The term Contractor also includes all Subcontractors.

**Contractor employee**—an individual that works for the Contractor company and performs work for and/or provides services for Cargill for a specific period of time or specific projects but is not on Cargill’s payroll.

## 3. EHS MANAGEMENT SYSTEM

The Contractor shall meet Cargill’s safety prequalification requirements. Failure to submit the safety performance record will result in rejection of the bid.



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The Contractor shall evaluate all the risks associated with the Scope of Work, classify those that pose high risk activities, and develop the safe work process for eliminating or mitigating those risks. The Contractor shall identify hazards using the Scope of Work Risk Level Evaluation Form (Appendix A) and develop a risk register to document the results of the serious injury and fatality (SIF) risk assessment(s) and risk management measures for any risks identified.

The Cargill project team shall coordinate with the Contractor's scope of work risk assessment during bidding and shall be given the opportunity to review the results of the assessment during bid evaluation.

- 3.1. Each Contractor working on a project must generate a Site Specific Health and Safety Plan, which includes a project specific SIF risk assessment. For required content of the plan, see –the Site Specific Contractor Safety (EHS) Plan Expectations (Appendix B).

Before starting the project, the Contractor and its lower-tier subcontractors shall forward a copy of their company's Site Specific Project Health and Safety Plan to the Cargill representative. This plan shall meet OSHA regulations and otherwise complies with applicable laws and regulations, and takes account of applicable guidance and approved codes of practice ("ACOPs"). Any reference to OSHA standards should be used as benchmarks with an expectation that at least an equivalent standard is any local jurisdictions.

Each Contractor's Project Health and Safety Plan shall include a section describing prevention strategies for the 12 LIFEsavers and SIF potential activities/tasks. High-risk activities defined in these documents include the following:

- Electrical
- Working at height
- Confined space entry
- Bulk material handling
- Rail car safety
- Hazardous materials
- Excavation and trench work
- Motor vehicle and Traffic Safety
- Hot work
- Lockout/tagout (LOTO)
- Lifting & Rigging
- Mobile Powered Equipment

Other significant exposures include noise, temperature extremes, demolition, aerial lifts, blasting, roofing, scaffolding, steel erection and working over water.

See the LIFEsavers Handbook (Appendix C).



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- 3.2. The Contractor must submit a company health and safety policy, signed by its Chief Executive Officer/Owner, that summarizes the Contractor's commitment to EHS and the steps, arrangements, and systems in place to ensure compliance with EHS Legal and Regulatory Requirements.
  - 3.3. The Contractor shall provide a written statement of the ZERO Harm expectation statement that includes goals and how zero harm performance will be achieved.
  - 3.4. The Contractor shall have a documented EHS organizational structure, with defined roles and accountabilities for leadership and personnel related to the delivery of safe compliant and reliable operations.
  - 3.5. Each Contractor shall develop and sign an EHS Bridging Document that identifies gaps and variances against the Cargill EHS requirements and contractor's site-specific EHS plan.  
Using the gap analysis, the contractor shall define actions required to bring them into conformance prior to commencement of work. See the EHS Bridging Document Evaluation (Appendix D).
  - 3.6. Prior to beginning work the owner (or approved designate) of the Contractor company will be required to attend a project pre-mobilization meeting with the Cargill representative(s). Any action items generated for the Contractor company as a result of this meeting shall be tracked in the EHS Bridging Document and must be resolved in the agreed time frame.
  - 3.7. The Contractor shall participate in Kick-off Meeting as requested by Cargill. The Contractor shall confirm, with evidence, that the following are completed and kept up to date:
    - Scope of Work Risk Assessment(s), including comparison against the contract, including region, or Business Group specific requirements
    - EHS Bridging document and
    - Site specific Project EHS Plan are completed, which shall be communicated to relevant personnel
    - EHS roles and responsibilities, including policies, practices are fit for purpose, personnel are competent, equipment is fit for service, and that all critical equipment has been identified and is accounted for within its inspection and maintenance plans.
    - Once all documents are verified as complete, the Contractor is in position to execute work in accordance with the EHS Requirements.
  - 3.8. The Contractor shall be responsible for maintaining required postings by applicable laws and regulations, including all required EHS documentation such as First Aid register or equivalent, inspections, incidents reports, equipment inspections records, and EHS training records for their employees.
  - 3.9. The Contractor shall specify accountability and processes to effectively communicate EHS arrangements to their personnel periodically or as necessary during the work. This shall include a consistent use of communication channels at all stages of work. For example, when crew and shift changes occur, sharing
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of EHS messages in a structured manner with set frequencies, and using the language(s) generally in use by personnel at each worksite.

- 3.10. The Contractor must immediately inform the Cargill project management team of any regulatory agencies' inspections at Cargill sites or regarding any other actions involving the Contractor's work.
- 3.11. The Contractor must immediately report all potential work-related incidents, including near misses, injuries, or illnesses, to the Cargill Contract Accountable Manager or Cargill EHS Representative. Reporting shall be done after the appropriate level of medical assistance, if applicable, has been arranged.  
Incidents involving, plant personnel, a third party, or a member of the general public must be promptly reported to the Cargill project management team within 24 hours of the occurrence.  
Incidents involving potential exposure to hazardous materials and releases or spills of these materials must be promptly reported to the Cargill project management team within 24 hours of the occurrence.
- 3.12. Formal incident Investigation reports shall be written for all reportable and SIFp Contractors incidents, injuries, and work-related illnesses. The reports shall include a root cause analysis and corrective action plan and are forwarded to the Cargill EHS Representative at completion. Cargill shall determine whether the Contractor will lead any incident investigation at the site.
- 3.13. The Contractor shall complete the - Monthly Contractor Incident Statistics Report (Appendix E) for each month in which they conduct work on the job or project. These reports are due to Cargill by the second (2nd) day of the next month.
- 3.14. The Contractor shall implement a behavior-based safety process that allows personnel to continually improve EHS behaviors through use of systematic identification of safe behaviors, observation, recording, coaching, and action.
- 3.15. The Contractor must initiate a management of change (MOC) process for any change, modification, or deviation of the Contractor's work process in order to identify any new hazard associated with the change. The MOC process must ensure that all new hazards introduced by the change are identified (including compliance to regulatory requirements). Actions to eliminate or reduce remaining risk must be implemented following the hierarchy of controls.
- 3.16. The Contractor shall have a process to record and track completion of all actions identified from EHS reviews, audits, inspections, incident investigations, and pre-task planning.

## 4. EHS TRAINING AND COMMUNICATION REQUIREMENTS

- 4.1. The Contractor shall provide necessary training to workers to enable them to work safely and record details of training given (such as worker's name, date, topic, and trainer). The Contractor must explain the project safety procedures and practices during the contractor employee's initial training.



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- 4.2. The Contractor employees must complete EHS training required by the project site-specific EHS plan, Cargill, OSHA regulations or equivalent regulatory requirement, and other applicable laws and regulations.  
This training may include, but is not limited to, a site-specific orientation and quiz, OSHA 10HR Construction Safety & Outreach Program or equivalent, LIFEsavers and SIF training, Emergency Action Plan, and task-specific training.  
All superintendents and assigned safety representatives must be certified in the 30-Hour OSHA Construction Safety course or an equivalent training.  
Documentation of all EHS training shall be maintained on Cargill's Third -party Prequalification Platform.
  - 4.3. Any worker involved in emergency response and/or hazardous waste operations as defined by 29 Code of Federal Regulations 1920.120 or an equivalent regulatory requirement shall have met, prior to any field activity or exposure, the training requirements of the standard. The Contractor shall provide certification of individual worker training prior to starting work.
  - 4.4. The Contractor must certify, by proof of inspection and/or written certification, that any crane used for a project has received an annual certification as a minimum or in line with local regulations. The certification must be available to Cargill for review.
  - 4.5. The Contractor must maintain records on site indicating that all operators of mobile powered equipment (such as forklifts, cranes, elevated work platforms, and vehicles) have been trained and/or certified on the proper operation of the equipment.
  - 4.6. Mobile crane operators must be qualified on each crane (model, type, and rating) that they are assigned to operate through a third-party testing and qualification process recognized by the Cargill Regional EHS Lead. All riggers and signal persons shall be qualified and satisfy the requirements of OSHA 1926.1400 or equivalent standard. Copies of their training and certification shall be maintained on the Cargill's third-party Prequalification Platform and made available upon request.
  - 4.7. Any worker who are required to perform electrical work shall meet Electrical Safety Training for Qualified. Any worker that is exposed to electrical hazards while not executing electrical work shall receive general electrical safety awareness training.
  - 4.8. Contractors must establish prompt and effective methods of providing EHS communications such as alerts, advisories, toolbox meetings, meeting directives, trends, and corrective actions using the language(s) generally in use by personnel at each worksite.
  - 4.9. The Contractor shall ensure that all necessary safety signs and signals are in place and are clean and clearly visible. All signs must be in English and the local language.
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## 5. GENERAL EHS REQUIREMENTS

To ensure that health, safety, and environmental standards are maintained during their work, Cargill requires each Contractor to follow the rules defined in this section. When there are multiple rules that may apply, the most stringent client, Contractor, or agency regulations that govern the work shall be followed. The hierarchy of risk control shall emphasize the first priority is hazard elimination with the use of personal protective equipment (PPE) as a last resort.

All Contractors and Subcontractors and their employees shall operate in a manner consistent with Cargill's EHS Policy (Appendix F).

### Organization and Personnel

- 5.1. Each Contractor shall have a documented EHS organizational structure, with defined roles and accountabilities for leadership and personnel related to the delivery of safe compliant and reliable operations.  
To support the qualifications of EHS representative, the Contractor must submit resumes of key EHS representative for Cargill's approval. Once Contractor EHS representative have been selected, they cannot be dismissed from the site without Cargill's knowledge.
- 5.2. Each Contractor shall appoint an onsite EHS representative. The EHS representative will attend Cargill's EHS meetings and support implementation of the rules listed below, as well as other EHS rules determined by the Contractor to be necessary for the safe execution of the project.
  - Contractors employing 25 or more workers, including subcontractor employees, must provide a full-time onsite EHS professional. This person shall have, as a minimum, 30 hours of OSHA construction safety training or an approved equivalent. Additional site EHS personnel are required for each additional 50 workers.
  - Safety staffing requirements will be reviewed and adjusted for crew sizes of 125 employees or more at Cargill's discretion. The Contractor shall also provide EHS administrative support personnel as necessary to implement their EHS program.
- 5.3. Prior to performing any work, the Contractor shall submit a Fatigue Risk Management Plan outlining assessment and mitigation measures to minimize incidents due to employee fatigue. Work with increase fatigue potential includes extended work shift, call outs, extended work schedules, or exhaustion from demanding work.

### Personal Protective Equipment

- 5.4. Contractor workers must wear, at a minimum, the following PPE while in a work area:
  - Hard hats (conforming to American National Standards Institute [ANSI] Z89.1 or CE Standards) shall be worn at all times in the work area and where overhead hazards exist (such as construction, environmental operations, and operations or maintenance environments), regardless of the workers activities.



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- High visibility reflective vests, shirts, or jackets must be worn where pedestrian and vehicles traffic routes can interact.
- Task-specific gloves must be worn, except when the use of gloves will not allow the required level of dexterity (such as when operating mobile equipment or peeling tape) or when gloves might increase the risk of personal injury (such as during the operation of rotating equipment). The competent person for each contractor is expected to select the appropriate cut resistant level (Minimum ANSI cut resistant level 4) gloves that mitigates the potential hazard present to their employees.
- Hearing protection must be worn when employees are exposed to noise levels approaching time weighted average (TWA) of 85 dBA, 8-hour.
- Hard-toe work boots must be worn. Footwear must cover the ankle and conform to American Society for Testing Materials, ASTM F-2413 or equivalent (Standard Specification for Performance Requirements for Protective Footwear).
- Eye protection shall be worn at all times in the work area. Safety glasses must have side shields. Frames, lenses, and side shields must meet the requirements for the country-specific guidelines or ANSI Z87.1 or CE Standards.  
Additional types of eye protection may be required depending on the hazard involved. Face shields must be worn during activities such as grinding, welding, chain sawing, chipping, or when handling chemicals, corrosive liquids or molten materials. Safety glasses must be worn under the face shield.
- Long pants (no sweatpants or pants with holes or frays) and shirts with at least 4-inch (10.1-cm) sleeves must be worn.
- Welders must wear ANSI-recommended welder's helmets. Welders and those using cutting torches shall wear ANSI or CE approved - recommended goggles.
- Personnel executing electrical tasks must wear the appropriate electrical shock and arc flash personal protective equipment as specified in standards and codes.
- Cargill's 100% Fall Protection shall be implemented anytime employees are exposed to an unprotected elevation of four feet (1.2m) or more, fall arrest or restraint shall be used. Working as stated above means while traveling, stationary, or at any time exposed to a fall from a surface not protected by approved handrails, guardrails or some other approved fall elimination device. This distance is measured from the walking working surface supporting the employee to the next lower surface onto which the employee may fall.
- All work that requires personnel to work in a fall arrest situation requires a fall protection plan which shall include a rescue plan.



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## Work Areas

- 5.5. Whenever personnel are engaged in high-risk activities (such as confined space entry, work at elevations requiring fall arrest/restraint, potentially energized electrical work, working above water, derelict building/structure demolition, or line breaking) they shall not work alone.
- 5.6. For any work activity in the presence of overhead lines at a minimum no conductive part shall be moved closer than 6m (20 feet) to any overhead line. If work is required in the vicinity of overhead lines it is only permitted when the overhead lines are locked out and tagged out or if contact with the overhead lines can otherwise be avoided (e.g., obstacles, barriers, sufficient distance, temporary insulation of the overhead line).
- 5.7. Storage of materials in the area between the overhead lines and the ground-level barriers shall be prohibited. The area under the overhead lines must be kept clear and should not be used for any purpose.
- 5.8. Contractor employees are allowed only in their assigned work area. Contractors should not enter any plant building or other plant area unless their duties take them there. Only regular passageways should be used in this situation. Contractors should not visit other departments or other sections of the departments in which they are not working.
- 5.9. Contractor employees working in unusually cold or hot environments shall submit an extreme conditions safe work plan that addresses, at a minimum, worker training, PPE, and engineering and administrative controls.
- 5.10. When using electrical equipment in wet and dangerous conditions, risk mitigation steps must be in place such as using equipment that is rated for such use.
- 5.11. When performing excavation or any intrusive work (e.g., cutting, drilling in walls, etc.) or working in the vicinity of overhead lines, mitigation steps must be called out as part of the activity risk assessment so that all electrical conductors potentially impacted at the work location are properly identified and safeguarded.
- 5.12. Work over or adjacent to water requires a specific safe work plan that must be submitted to Cargill before work begins. This includes, but is not limited to, rivers, lakes, canals, settlement ponds and open tanks containing liquids. Approved Personal Flotation Devices (PFDs) must be worn when working over or adjacent to water. When working over or adjacent to water without 100% fall protection, PFDs that will provide floatation in a face-up position to an unconscious person must be used. Personnel shall not work over water alone.

## Equipment

- 5.13. Contractor employees are not allowed to use or operate any Cargill equipment, except when they have written permission. If Cargill equipment is required for the job, the Contractor must notify Cargill management and receive permission in writing to use specific equipment for a stated time limit (see the EHS Global Procedure – Mobile Powered Equipment document for additional information).



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- 5.14. Equipment and tools shall not in any way be altered to adapt them for a job that the manufacturer did not intend them to be used. The manufacturer of the equipment must approve any adaptations or alterations to equipment in writing. Only trained and authorized persons shall operate machinery and equipment.
  - 5.15. All hand-held power tools must be equipped with constant pressure switches that will automatically shut off power when the pressure (worker's hand) is removed. Hand-held power tools with on/off or lock-on switches are not allowed.
  - 5.16. Angle grinders used as a cutting tool are restricted on Cargill sites. A risk assessment to identify alternative methods and tools shall be carried out prior to selecting an angle grinder as cutting tool.
  - 5.17. As additional measure, even if permanent ground fault circuit interrupters or residual current devices (GFCIs or RCDs) are installed, portable GFCI or RCD are required for the use of portable tools, extension cords and mobile installations. GFCIs and RCDs must be tested by the user prior to each use.
  - 5.18. Traffic Areas, Vehicles, and Moveable Equipment.

The Contractor shall build a traffic management plan that is valid for the entire site. In addition to vehicle traffic, traffic also refers to the movement of transport facilities including systems, machines, delivery vehicles, mobile working platforms, working platforms, private vehicles, and the logistics for delivering large-sized equipment.

For movement of mobile powered equipment and motor vehicles in congested areas, a designated flag-person shall be in full view of the operator and shall direct the movement. In some cases, multiple flag-persons may be required.

- 5.19. The Contractor shall obey delineated pedestrian walkways and motor vehicle roadways, with particular attention to those in close proximity to site entrances and gates, eating facilities (eating facilities or cafeteria), and other areas where high concentrations of pedestrian traffic near moving vehicles are possible.
  - 5.20. Motor vehicle and mobile equipment shall never be left running without an operator at the controls. (This requirement may be waived in northern climates.) Proper use of seat belts by all occupants is mandatory. Motor vehicle operators are prohibited from using a mobile phone or two-way radio while driving. This applies to both hands free and non-hands-free devices. A motor vehicle operator is only allowed to use these types of devices when the motor vehicle is stationary and in a safe location off the roadway. If required, the use of two-way radios is allowed, provided that written approval is obtained, and they are only used while on a project location or within the facility.
  - 5.21. All trailers, floats, and flatbeds that transport material shall be equipped with the appropriate number and size of stanchions to eliminate unexpected movement of the load. All materials shall be secured during transport. Clearance should be maintained under loads on trailers to allow access for rigging, forklift forks, and other equipment. A hierarchy of control must be established. The first level of control is to stay off the trailer by using a crane/lofting frame, forklift, or aerial lift. The second level of control is to establish an engineered walkway and/or handrail on or adjacent to the trailer. Regardless of ground conditions, pads shall be
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placed underneath the trailer support legs to prevent the legs from sinking into the ground.

- 5.22. Mobile Equipment including cranes, MEWPs, utility terrain vehicles (UTVs), etc. must have regular prevention maintenance, pre use shift inspections conducted and be equipped with roll over protection, seat belts, and leg and/or feet shields. Cargill must approve the use of these types of vehicles in writing and before use.

## **Barricades and Obstructions**

- 5.23. Barricades shall be erected to warn of hazardous condition. Never cross a barricade unless authorized to do so. Employees shall be trained to understand and respect various types of barricades. A sign and/or tag shall be used to communicate to personnel outside the barricaded area the identified hazards, Contractor company name, person who is responsible for the barricade, and the current date.
- 5.24. Contractor must develop a demolition plan and assure that a competent person has conducted an engineering survey of the exact scope of work and the method to safely execute it. The engineering survey must be documented in writing and provided to Cargill at least 5 working days prior to initiation of demolition activities. The survey must include details on the method of removal, integrity of the structure (including structures that may be affected), energy isolation, risk assessment, and provisions to safeguard all personnel from the hazards associated with demolition activities.
- 5.25. The Contractor shall ensure that all debris is kept clear from the work area, passageways, stairs, and in and around buildings or other structures. The Contractor shall provide adequate waste receptacles, continuous cleanup of its work areas, and daily removal of all scrap and waste materials that accumulate from its operations.
- 5.26. All cables, cords, leads, and hoses in a building shall be strung by nonconductive means at least 7 ft (2.1 m) overhead, kept to the perimeter of the building, or otherwise protected to prevent tripping hazards.
- 5.27. The Contractor will be responsible for removing snow and ice from its work, office, and storage areas; other construction facilities in its use; and walkways between these areas. When weather conditions are favorable for the presence of snow or ice, walkway traction shall be enhanced with salt or sand.
- 5.28. Impalement protection must be provided for both horizontal and vertical exposures. Protection must be provided on rebar where there are hazards associated with laceration and related injuries in addition to impalement.

## **Personal Conduct**

- 5.29. Smoking is only allowed in designated smoking areas that have been approved by the Cargill plant and/or project management.
- 5.30. The Contractor shall develop and implement a policy for use of personal mobile telephones, radios and audio equipment. Personal mobile telephones and radios shall not be used by drivers in any vehicles utilized for the project or trucks that



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deliver materials and/or equipment, even if they are hands free or Bluetooth enabled. Workers performing field activities shall not use personal mobile phones. Personal mobile phones may be used only during rest breaks. Designated areas where it is permissible to use personal mobile phones shall be identified across the site.

- 5.31. The Contractor will provide a designated eating area away from the main work area. The eating area shall be kept clean and protected from weather exposures. Personnel shall be furnished with seats, tables, and an area to store meals. The Contractor shall provide hand-washing stations and trash receptacles.
- 5.32. The Contractor must provide restroom facilities, including a handwashing area and hot water, within 45 days of site mobilization. Individual portable toilet rentals with handwashing stations may be used prior to 45 days.
- 5.33. The Contractor must ensure potable water is provided to all personnel. Water coolers used to dispense water shall be maintained clean and sealed with tape to maintain sanitation. Paper drinking cups must be provided.

## 6. CERTIFICATION, INSPECTION, CARGILL AND REGULATORY AGENCY PERMITS

- 6.1. Certain operations may require a Cargill permit. These activities may include, but are not limited to
  - Working at heights
  - Electrical work
  - Hot work
  - Confined space or vessel entry
  - Excavations
  - Lifting and Rigging
  - Asbestos abatement, lead abatement
  - Demolition.

The Contractor representative shall confirm with the Cargill project management team if any parts of the Contractor scope requires a Cargill permit.

- 6.2. Some local regulations require permits for specific activities such as excavations, heavy lifts, asbestos and lead abatement, air permits, water permits, construction storm water permits, and hazardous waste generation. Contractors are responsible to secure and comply with these permits, unless the Cargill Project Management has delegated this responsibility, in writing, to others.
- 6.3. A third-party certified competent person shall make a thorough annual inspection of all cranes and powered hoisting equipment. Cranes assembled on site shall receive an annual inspection prior to being put into service. Documentation of all crane inspections shall be provided to the Cargill and must be maintained on site by the Contractor.



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- 6.4. All scaffolding must be inspected and tagged by a competent person prior to initial use and after any event that could affect its structural integrity. Untagged scaffolds must not be used. Scaffold users must inspect the scaffold prior to each use. Contractors are required to implement a scaffold inspection process and schedule. A competent person must perform alterations to scaffolds.

## 7. EQUIPMENT

- 7.1. Contractor shall develop and implement a formal process and generate a written plan for identifying, certifying, inspecting, and maintaining (including corrosion monitoring and inspection) all Contractor-provided equipment (including critical equipment) to ensure ongoing fitness for service and compliance with legal and regulatory requirements. The process and plan shall include requirements to
- Operate within manufacturer-defined operating limits and in accordance with documented operating procedures.
  - Monitor, document, and investigate any unexpected failures and unintended excursions outside of the operating limits set in the relevant operating procedures.
  - Verify the adequacy and accuracy of the methods for measuring and monitoring equipment at defined intervals.
  - Evaluate results of equipment inspection(s) and modify inspection plans as necessary to mitigate emerging risk.

The Contractor shall comply with the EHS Requirements and only use, purchase, or supply materials that are suitable for conducting work safely and providing a safe working environment for all persons.

When requested by Cargill, the Contractor shall confirm that equipment is in conformance with the equipment requirements. The Contractor shall provide Cargill with current inspection and/or maintenance progress and completion reports or other documents relating to the equipment.

## 8. ELECTRICAL SAFETY

- 8.1. All local electrical code requirements must be followed
- 8.2. Electrical equipment must only be used for their intended purpose and never operated outside the design limits
- 8.3. Only qualified person are allowed to execute electrical work.
- 8.4. The Contractor is expected to meet Cargill's minimum safety standards for the design, construction, and testing of electrical installations and equipment that supply electricity to appliances and equipment on construction and demolition sites.
- 8.5. All work activities (electrical or non-electrical) with electrical hazard exposure requires Electrical Work Permit (EWP) in combination with the PHJA the



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Electrical Activity Risk Assessment (EARA) is required for all electrical work activities. An Energized Electrical Work Permit (EEWP) in combination with an EARA is required for tasks working in the close vicinity of energized parts.

- 8.6. Lockout tagout (LOTO) shall be required for all electrical work on equipment exceeding 50V (AC or DC). The contractor shall have a written procedure for putting and verifying equipment in a safe electrical working condition (electrical LOTO) and for reinstating into service.
- 8.7. All electrical tasks must be performed using the appropriate personal protective equipment (PPE) and tools.
- 8.8. Working on energized parts >50V shall not be permitted after May 2021 for all Cargill locations, except for activities specified in the Global EHS Electrical Safe Work Execution procedure
- 8.9. These work activities require specific risk mitigation steps, such as the use of personal protective equipment (PPE), insulated tools, and certified measurement equipment.
- 8.10. The contractor shall observe all safe working practices as stipulated in the Global EHS Electrical Safe Work Execution procedure while performing work at Cargill sites.

## 9. HOUSEKEEPING

- 9.1. The Contractor shall maintain its own work area, laydown area, storage areas and warehouse in a tidy and clean state. In addition, the Contractor shall ensure that tools; accessories; and unnecessary residue material, construction debris, boards, glass wool, cable scraps, packaging materials, food scraps, and other items are removed immediately and at least once a day from the areas used by the Contractor or their subcontractors.
- 9.2. The Cargill Project team shall evaluate the order and cleanliness at the project site and the various work areas as a key Contractor performance indicator. In case of identifying poor performance in housekeeping, Cargill reserves the right to either use a clean-up team and charge the costs incurred to the Contractor who does not fulfil their obligations or to assemble a clean-up team using staff of other contractors on site.
- 9.3. All tools and materials shall be cleared away following use and stored securely thereafter. There shall be no exposure of the project workforce to the risk of slipping, tripping, or falling as a result of the improper laying of cables, pipes, hoses, or other apparatus or from any stored material. All escape routes shall remain clear of obstructions.

## 10. HAZARDOUS CHEMICALS

- 10.1. The Contractor and all Subcontractors will submit safety data sheets (SDS) for all chemicals that will be used at the site for Cargill to review and approve prior to bringing onsite. The Contractor is responsible for complying with Global



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Harmonized Standard, and all applicable state and local hazard communication requirements, which include the following:

- Developing and implementing a written hazard communication program for the site and providing copies to Cargill upon request
  - Conducting a risk assessment to determine which types or applications of chemicals are considered high safety risks
  - Maintaining a list of all hazardous materials present in the workplace and posting it in a location that is accessible to all employees. An SDS must be on file for each material.
  - Training its employees in the proper handling of and protection from all hazardous materials
  - Providing Cargill with the quantity of each hazardous material brought on site
  - Labeling chemicals with the appropriate name, hazard, and warnings
  - Providing copies of the list of hazardous materials and the SDSs to state and local officials as required
- 10.2. The Contractor will take effective and responsible steps to contain, control, and clean up all spills and will immediately notify Cargill of any chemical spill, including fuels and lubricants. The Contractor will also notify the appropriate regulatory agency(ies) of any spill exceeding regulatory thresholds.
- 10.3. All drums, containers, chemicals, and wastes generated by the Contractor are the property and responsibility of Contractor.
- 10.4. Chemical wastes will be secured daily and removed from the property at the conclusion of the work. Contractor is responsible for disposing of waste in accordance with all regulatory guidelines.
- 10.5. The Contractor will not discharge any construction materials or chemicals, including service water, into local waterways or drains.

## 11. EMERGENCY ACTION PLAN

- 11.1. The Contractor shall comply with Cargill's Emergency Action Plan when at a Cargill worksite, unless otherwise endorsed by the Cargill.
- 11.2. The Contractor shall develop an emergency action plan and associated procedures for the project site. This plan can be embedded in the wider Contractor site specific safety EHS plan or stand alone as a bridging document to the existing Cargill facility fire safety plan. The plan will cover the project temporary site facilities and field work areas. The Contractor's emergency action plan will contain the following:
- Assurance that suitable and adequate fire safety assessments have been performed for working on the site



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- Nomination of qualified persons as fire safety officers (as applicable under local regulations)
- Provision of suitable fire alarm systems, fire-fighting equipment, and adequate escape routes, including signage, in all designated facilities as well as assurance that these will be checked and tested regularly
- Notification of emergency phone numbers (including 24-hour emergency phone service)
- Commitment for performance of regular fire-fighting drills
- Ban on burning of waste or other material on the project site
- Prohibition for use of open fireplaces
- Commitment for active management of hot work through the use of a permit to work system
- Compliance with fire safety measures that are part of Cargill's existing buildings in the vicinity of the project work areas
- Commitment that used fire extinguishers shall be replaced immediately. The Contractor shall demonstrate that its employees have been trained in the handling of the fire extinguishers.
- Personnel must be trained in responding to electrical incidents, in particular how to release the injured person from the electrical circuit and how to treat a person (e.g. CPR, AED and taking care of burn wounds after an arc flash incident)

## 12. INCIDENT INVESTIGATION REQUIREMENTS

- 12.1. The Contractor shall follow a formal incident investigation and reporting procedure for work-related incident that requires, at a minimum, the following:
- Verbal notification of incidents, as soon as practicable, to Cargill
  - Written notification to Cargill of any SIFp (Serious Incident Fatality Potential) (Appendix G) within twenty-four (24) hours of the occurrence or within the timeframe specified by any legal and regulatory requirements, whichever is lesser
  - All electrical incidents with serious injury and fatality (SIF) potential must include a professionally trained electrical subject matter expert in the investigation process
  - Initiation of incident investigation of any SIFp within forty-eight (48) hours of occurrence or within the timeframe specified by legal and regulatory requirements, whichever is lesser
  - Formal written record of all notifications maintained and available to Cargill on request
  - Prompt notification maintained and available to Cargill on request



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- All alleged violations of EHS related legal and regulatory requirements in relations to work
- All inspections or notices of inspection of work or any worksite by any authority
- Any failure to comply with the EHS arrangements

A root cause analysis must be performed to determine root causes and process system failures.

- 12.2. The Contractor shall be responsible for development and execution of corrective action plans, inclusive of accountabilities, due dates, and tracking.
- 12.3. The Contractor shall analyze results of incident investigations at intervals (such as monthly, quarterly, or as otherwise endorsed by Cargill) to identify trends. The Contractor shall develop action plans at the Contractor's expense to address identified trends. These plans shall include due dates for completion and tracking of actions to closure. The Contractor shall be prepared to present this information at performance review meetings with Cargill.
- 12.4. The Contractor shall cooperate with the incident investigation that is being carried out by Cargill. The Contractor shall provide (without limitation) any data, documents, images, video footage, or other recorded media that is required by Cargill in the course of its investigation along with statements and collaboration from any personnel that are aware of any facts or circumstances related to the Incident.
- 12.5. In the event that work is stopped due to the occurrence of a SIFp, work shall not resume without Cargill's approval.

## 13. HEALTH MANAGEMENT

- 13.1. The Contractor's risk management measures shall include programs for industrial hygiene monitoring, health surveillance, and infectious disease management.
- 13.2. Contractors shall update site specific EHS plans with their COVID-19 safety plan.
- 13.3. The Contractor shall ensure that all personnel have access to medical evaluations and reasonable access to healthcare (first aid and primary and emergency medical care). Each of these shall be provided by Contractor unless Cargill has confirmed in writing that Cargill will provide these services.  
Whether medical evacuation is provided by Cargill or by the Contractor, the Contractor shall be responsible for all medical treatment received by the evacuated person.
- 13.4. The Contractor shall implement an ergonomic program including but not limited to morning stretching to avoid soft tissue injuries on the job.
- 13.5. The Contractor shall implement a hearing loss prevention program when employees are exposed to noise levels at or above 85dBA or as required by regulatory agency.



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- 13.6. The Contractor shall manage fatigue through an established fatigue management program.
- 13.7. Provision of any medical care by Cargill does not relieve Contractor of its obligation to provide personnel who are Fit-for-Duty.

## 14. RESPIRATORY PROTECTION

- 14.1. Contractors whose employees will be using respirators as part of their work operations are required to forward a copy of their written respiratory protection program to Cargill.

## 15. EHS SURVEYS

- 15.1. The Cargill project management team and the Contractor EHS Department shall conduct periodic EHS surveys of the project. Any EHS discrepancy observed shall be reported to the appropriate Contractor representative for immediate correction.
- 15.2. The EHS surveys do not relieve the Contractor of their responsibility to self-inspect their work and equipment and to conduct their work in a safe and environmentally compliant manner.

## 16. CONTINUOUS IMPROVEMENT

- 16.1. Contractor leadership shall review the site-specific safety (EHS) plan at planned intervals to ensure its continuing suitability, adequacy, and effectiveness. These reviews shall include assessing and documenting opportunities for improvement and the need for change to the site-specific safety (EHS) plan.
- 16.2. Records of reviews shall, as a minimum, document the monitoring and measurement mechanisms used for determination of improvement actions.
- 16.3. Cargill may perform detailed safety audits on all on-site Contractors. These audits will focus on how well the Contractors are implementing and documenting company safety policies and programs.

## 17. PLANNING AND OBSERVATIONS PROCEDURES

In order to reach Cargill's goal of ZERO incidents, this section provides processes that shall be implemented by the Contractor. The Pre-Job Hazard Analysis (PJHA) and/or Pre-Task Brief (PTB) and Safety Observation processes require the worker(s) to receive on-the-job training from their direct supervisor. The Contractor employee shall be trained and educated on their individual responsibilities provided in these tools by Cargill after mobilization.

- 17.1. **Pre Job Hazard Analysis (PJHA):** The work team assigned to perform work with guidance from their supervisor develops the PJHA. The supervisor identifies the work area(s) and task(s) to be performed and then leads the work team in developing the PJHA. Creating the PJHA requires the supervisor to solicit work team participation in identifying hazards and hazard control measures such as PPE, training requirements, permits, and procedures. Members of the work team are required to sign the PJHA documentation to indicate their participation,



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understanding of the plan, and agreement to follow the plan. The PHJA shall be conducted daily or when conditions and/or scope changes.

- 17.2. **Pre-Task Brief (PTB):** The PTB is a daily EHS briefing associated with the task(s) that are scheduled for the work team during the work shift. These meetings generally take from 2 to 10 minutes and address the EHS measures specific to the tasks. PTB meetings shall be conducted at least daily and whenever a task presents a change of hazards from the previous tasks.
- 17.3. **Safety Observation:** The Safety Observation is a proactive process designed to identify and document EHS-related acts and conditions in the work environment. All Contractors' supervisors are required to participate in the safety observation process by generating written observations and sending them to the Cargill project management team at least weekly or as defined by the project. The safety observation process allows any on-site worker to record proper or improper EHS practices and identify the cause of any deficiencies so that corrective action can be taken.

## 18. SECURITY

- 18.1. The Contractor shall enter Cargill property only through the gate designated by the Cargill. All Contractor vehicles entering or leaving Cargill property shall contain the company name on side of the vehicle and will be subject to search. The Contractor will be liable for theft of any Cargill property by the Contractor's employee.
- 18.2. The Contractor shall comply with Cargill's security management policies and procedures, effective at each Cargill worksite, including restrictions on the presence, carrying, or use of firearms and other lethal or non-lethal weapons.
- 18.3. In the event that the Contractor becomes aware of a security incident, threat, or emergency affecting or related to work or personnel, the Contractor shall immediately inform Cargill in accordance with the incident investigation and reporting procedures.

## 19. SUBCONTRACTOR SELECTION AND ROLES

- 19.1. Contractors shall only use Subcontractors that have been prequalified according to Cargill requirements.
- 19.2. Contractor shall verify that Subcontractors meet EHS Requirements throughout performance of work.

## 20. DRUG & ALCOHOL POLICY AND COMPLIANCE

Cargill prohibits the use, possession, sale, purchase, transfer, concealment, transportation, or possession of prohibited substances by any personnel when performing work, while on a Cargill worksite, in any company vehicle, or on company time. The Contractor shall ensure that personnel comply with this prohibition and are free from the effects of any prohibited substances at these times and locations.



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- 20.1. The Contractor shall inform all personnel of Cargill's and its drug and alcohol policy prior to starting work.
- 20.2. Subject to applicable legal and regulatory requirements, the Contractor shall have a drug and alcohol policy that includes the following provisions:
- Personnel shall not sell, purchase, transfer, conceal, transport, or possess Prohibited Substances and shall be free from the effects of prohibited substances while performing work.
  - Contractor personnel shall let their company know about use of any prescription or non-prescription medicine or any other substance that they believe, or have been advised, may impair their judgement or performance or otherwise adversely affect the normal functions of their mental faculties or physical abilities.
  - Contractor personnel who are required to drive while performing work shall inform their company if they no longer have a valid and/or unrestricted driver's license as a result of arrest or conviction related to drugs and/or alcohol.
  - Testing subject to local regulations for the presence of certain prohibited substance as identified by Cargill may take place
    - Prior to confirming employment of personnel.
    - Following an owner worksite incident.
    - As part of random testing program or reasonable suspicion testing.

If Cargill or a Contractor has reasonable suspicion that a contractor personnel is using a prohibited drug or alcohol, the person shall be subjected to the following:

- Drug testing at any time and for any reason.
- Search of facilities, living quarters, vehicles, lockers, and other personal property on an owner worksite

Any personnel who refuses to undergo a Prohibited Substance test required by owner or Contractor shall not perform work pending a Prohibited Substance test.

Any personnel testing positive for the presence of a prohibited substance must be removed from performing work pending confirmation of the test result and further investigation.

- 20.3. The Contractor shall bring any incident involving a prohibited substance to the attention of Cargill in accordance with the incident investigation and reporting procedure (refer to Section 11).
- 20.4. Cargill reserves the right to report known or suspected illegal activity to authorities.



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## 21. CORRECTIVE ACTION POLICY AND IMMINENT DANGER SITUATIONS (SERIOUS INJURY AND FATALITIES POTENTIAL)

- 21.1. Contractors are required to have corrective action and/or disciplinary policy and procedures to deal with noncompliance to EHS rules and regulations by a subcontractor and lower-tier subcontractor employees.
- 21.2. Contractors are required to enforce compliance to EHS rules, regulations, and practices by Contractor and subcontractor employees.
- 21.3. Upon discovery of any situation that may, in the opinion of Cargill, reasonably be expected to cause serious physical harm, illness, death, or significant environmental damage, the Contractor project lead or EHS representative shall suspend the related work immediately. Work may resume only after the EHS concern(s) have been corrected to the satisfaction of Cargill. Examples of “imminent danger” situations SIFp (Appendix G) may include, but are not limited to, the following:
- Falls from elevation
  - Excavation not properly sloped or shored
  - Electrocuting hazards
  - Work activities posing injury hazard to the plant personnel or general public
  - Operation of vehicle, machinery, or heavy equipment in an unsafe manner
  - Improper Lock Out/Tag Out procedures
- 21.4. In addition to the immediate suspension of work, the procedure for correction of imminent danger situations follows the “EHS Adherence Policy” set forth in Section 21.

## 22. EHS ADHERENCE POLICY

Contractors are required to comply with the applicable EHS requirements and regulations. The procedures below outline a three-step system to correct compliance problems. However, if in the opinion of the Cargill the non-compliance issues are considered to be severe, the Contractor’s contract can be terminated at any time.

### 22.1. Action Level One

If a Contractor fails to comply with an applicable LIFEsavers requirements and multiple instances of non-LIFEsavers requirements, Cargill site and/or project management will issue a written “Notice of EHS Non-Compliance” (Appendix H) to the SUPPLIER site operations representative and EHS representative. Site and/or Project Management will also forward a “Warning Letter for EHS Non-Compliance” (Appendix I) and a copy of the Notice of HSE Non-Compliance to the Contractor President or Operations Manager. Copies of these two documents will also be forwarded to the Contractor Operations and EHS Manager.

### 22.2. Action Level Two



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If EHS non-compliance is not corrected under Action Level One or the Contractor repeatedly fails to comply with the applicable EHS regulations, the Cargill Project Management will issue a "Written Notice of Temporary Job Suspension" (Appendix J) to the Contractor. The Contractor work may not resume until the Cargill's operations manager and the Contractor's operation manager or equivalent have met, and the Contractor has proposed corrective actions that are acceptable to Cargill.

Actions that may be considered include, but are not limited to

- Removal of certain Contractor personnel from the project.
- Alteration of the Contractor's job procedures.
- Implementation of corrective action by Cargill with back charges to the Contractor.

The Contractor shall not resume work until the Cargill's operations leadership accepts the proposed corrective actions. Cargill's operations management will document and keep on file the meeting results in the form of meeting minutes.

### 22.3. Action Level Three

If Action Levels One and Two do not result in the Contractor's EHS Performance being brought into compliance, the Contractor may be terminated. After verifying with the Cargill site and/or project management that the EHS adherence procedure has been followed and after giving the Contractor applicable notice, Cargill's operation management may terminate the Contractor. A Contractor that has a contract terminated in accordance with this procedure is ineligible to participate in future Cargill projects until the Contractor has implemented and demonstrated corrective actions to improve their deficiencies. Only written approval from the Cargill operations leadership team can reinstate a Contractor's eligibility



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**Appendix A  
Scope of Work Risk Level Evaluation Form**

Task Description:				Assessment Date:	
Team:					
Potential Risk	Potential Risk/ Hazard Description	Tasks	Risk Severity	Hazard Mitigation	Risk Level
1	<b>Nature of the work</b> <i>Risk in the work activities (e.g., lifting operation, hot work, confined space, excavation, working on live equipment or in the vicinity of live equipment, working at heights, demolition etc.)</i>				
2	<b>Simultaneous work by different contractors</b> <i>Risk where different contractors work simultaneously (e.g., maintenance and Construction activities simultaneously with plant operation, work at the same area with other contractors, etc.)</i>				



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Potential Risk	Potential Risk/ Hazard Description	Tasks	Risk Severity	Hazard Mitigation	Risk Level
<b>3 Work Location</b> <i>Risk where work location may become a risk (e.g., working at production area, hydrogen area, office environment, etc.)</i>					
<b>4 Work Duration</b> <i>Risk in the work activities where the work duration may be factor (e.g., long period of work without day off, overtime works, shift work, etc.)</i>					
<b>5 Contractor Experience</b> <i>Risk of contractor experience may become a major factor (e.g., inexperience contractor in conducting lifting operation, scaffolding installation, chemical handling, etc.)</i>					
<b>6 Material used</b> <i>Risk of the material used (e.g., chemical, paint, steel, etc.) that resulted physical, chemical, biological impacts to environment damage</i>					
<b>7 Equipment used</b> <i>Risk of the equipment used (e.g., crane, heavy equipment, radioactive source, hand tools, machinery, mobile powered equipment, electrically powered tools and extension cords, etc.)</i>					



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Potential Risk	Potential Risk/ Hazard Description	Tasks	Risk Severity	Hazard Mitigation	Risk Level
<b>8 Potential for exposure to work site hazards</b> <i>Risk from the work site (e.g., expose to heat stress, potential fire and/or explosive hazard in the plant, asphyxiates, carcinogens, rotating machinery, noise, vibrations, slippery slope, difficult access, underground utilities, overhead powerlines, structural integrity, etc.)</i>					
<b>9 Exposure to negative publicity</b> <i>Risk of publicity issue when conducting the work, including regulatory in compliance issue (e.g., communicating with government, community work, media works, fail to meet regulatory requirements, etc.)</i>					
<b>10 Potential exposure to hazards for other personnel</b> <i>Risk towards other personnel in the work activity conducted (e.g., land transportation, catering supply, radiography activity, generated noise from the work, room painting may interfere with people activity, etc.)</i>					



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Risk Assessment Matrix

		Severity	
SIF Potential	<b>Catastrophic</b> Fatality or Multiple Fatalities	<b>A1</b>	
	<b>Critical</b> Life Threatening or Life Altering	<b>B1</b>	
<b>Significant</b> Significant but Reversible (Lost Time)		<b>C1</b>	
<b>Marginal</b> Minor Reversible (Reportable)		<b>D1</b>	
<b>Negligible</b> No Injury Expected		<b>E1</b>	
<b>High Risk</b>		<b>Medium Risk</b>	<b>Reduced Risk</b>



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**Appendix B**  
**Site Specific Contractor Safety (EHS) Plan Expectations**

ELEMENT	EXPECTATIONS
<b>Summary of Scope of Work</b>	A high-level summary of the contract scope of work.
<b>Contractor's EHS Organization</b>	<ul style="list-style-type: none"> <li>a. A clearly documented safety organizational structure aligned to the work, including numerical ratios demonstrating each leader's span of control.</li> <li>b. A list of Contractor leadership roles that will be assigned to the work, including the Contractor's clearly defined EHS objectives, roles, accountabilities, and responsibilities.</li> <li>c. A list of personnel critical to safe operations.</li> </ul>
<b>Organizational Interfaces</b>	<ul style="list-style-type: none"> <li>a. A description of worksite organizational interfaces (consistent with any interfaces identified in the EHS Bridging Document) for EHS management and supervision, covering communication channels               <ul style="list-style-type: none"> <li>1) In the Contractor's organization,</li> <li>2) Between the Contractor and subcontractors,</li> <li>3) between Contractor and Cargill,</li> <li>4) between Contractor and other Contractor groups.</li> </ul> </li> <li>b. Any further actions as specified by Cargill to address work interfaces.</li> </ul>
<b>Key Work-related Information</b>	<p>Communication to personnel of following:</p> <ul style="list-style-type: none"> <li>a. The EHS arrangements and EHS requirements that are relevant to the Contractor's work</li> <li>b. The Contractor's rights and obligations regarding Stop the Job and incident reporting, including which incident reporting procedure to follow at the worksite,</li> <li>c. Any identified hazards and risks, and related risk management measures that are relevant to personnel performing the work,</li> <li>d. How changes to work or aspects that affect their health and safety will be communicated, and</li> <li>e. Who the Contractors personnel's designated safety representative(s) are.</li> </ul>
<b>Specific Actions from EHS Bridging Document</b>	<ul style="list-style-type: none"> <li>a. A list of Contractor group policies, practices, and procedures relevant to the work that has been modified to meet contract requirements, with a summary of the modifications.</li> <li>b. Any Cargill group or other Contractor group policies, practices or procedures that have primacy for performance of any work.</li> </ul>



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ELEMENT	EXPECTATIONS
<b>Risk Management</b>	A list of SIFp incident risks identified through execution of the risk register and a summary of risk management measures in place to prevent them.
<b>Training and Competencies</b>	A training and competency matrix, by role, which includes: a. EHS induction/orientation training for personnel, b. Identified EHS training requirements, and c. A list of certifications and associated training required per legal and regulatory requirements.
<b>Equipment, Tools and Materials</b>	Reference to or inclusion of a register of critical equipment and summaries of related equipment certification, recertification, and retirement plans.
<b>Security Vetting</b>	Arrangements for the conduct of security background vetting of personnel prior to participating in work or entering a Cargill worksite.
<b>Fatigue Management Program</b>	Reference to or inclusion of a fatigue management program including: a. Off-time requirements b. Maximum working hours per day c. Number of consecutive working days (whether for a Cargill group or otherwise) d. Heat exposure plan
<b>Health Management</b>	A summary of Contractor's risk management measures shall include programs for industrial hygiene monitoring, health surveillance, and infectious disease management. a. COVID-19 Safety Plan
<b>Environmental &amp; Social Aspects and Impacts</b>	A summary of the Environmental and Social Management and Monitoring Plan relevant to work.
<b>Internal Audit/Inspection</b>	Reference to or inclusion of: a. A contractor internal audit/inspection plan 1) With a rigor level commensurate with the level of risk identified through execution of the risk register, including timeline, frequency, and resources. 2) That includes confirmation to Cargill, at intervals no greater than annually, that personnel are competent, equipment is fit for service and work is carried out in compliance with the EHS requirements. b. Process for identifying deficiencies as part of internal audit and inspection activities, including a process for correcting non-conformances, and communicating them to Cargill. c. Contractor management site inspections program.



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ELEMENT	EXPECTATIONS
<b>EHS Performance Reporting</b>	<p>a. Reference to or inclusion of process(es) in place to communicate EHS performance to personnel, including but not limited to:</p> <ol style="list-style-type: none"><li>1) Incidents</li><li>2) Near Misses</li><li>3) SIFp Observation (unsafe act/condition) rate</li><li>4) See Say Stop Submission for supervisory level and above</li><li>5) Safety inspection by project leadership</li><li>6) Number of work to permit and PJHA audits</li><li>7) Training work hours</li><li>8) Action items closure</li></ol> <p>b. Reference to or inclusion of process(es) in place to apply lessons learned as a result of incident investigations and audit findings.</p>
<b>Emergency Response Plan</b>	<p>a. Direction to personnel to follow the applicable emergency response plan at the worksite.</p> <p>b. Summary of interface points between contractor emergency response plan and Cargill's or other emergency response plans, where applicable.</p>
<b>EHS program</b>	<p>a. Contractor shall develop an EHS program to achieve the EHS objective and to implement the management commitments</p> <p>b. EHS Program shall be socialized to all personnel, reviewed monthly, and measure its performance in EHS KPI.</p>
EHS=environmental, health, and safety; KPI=key performance indicator; SIF=serious injury and fatality.	

## Appendix C LIFEsavers Handbook

The details on the topics presented below are provided in a handbook that is given to each supplier as a resource when conducting work for the Owner.



### **MOTOR VEHICLE – TRAFFIC SAFETY**

Wear your seat belt, drive at appropriate speeds, avoid distraction and never drive impaired.



### **WORKING AT HEIGHT**

Follow all safety precautions for activities with the risk of falling more than 1.2 m (4 ft).



### **MOBILE POWERED EQUIPMENT**

(Excluding Cranes and Trains)

Only operate mobile equipment when trained and authorized.



### **LOCKOUT TAGOUT – ENERGY ISOLATION**

Secure ZERO energy state before starting work on equipment or processes.



### **ELECTRICAL WORK**

Assume equipment is live; never expose yourself unprotected to live electrical energy.



### **CONFINED SPACE ENTRY**

Confined space entry always requires an approved permit.



### **BULK MATERIAL HANDLING AND STORAGE**

Always be alert for engulfment hazards and follow safety and permit precautions.



### **RAILCAR SAFETY**

Only move railcars when trained and authorized. Always be alert for moving railcars, maintain a safe distance.



### **EXCAVATION AND TRENCH WORK**

Always obtain authorization before commencing excavation or entering a trench.



### **LIFTING AND RIGGING PROTECTION**

Never climb on, walk or stand under suspended loads.



### **HAZARDOUS MATERIALS**

Always understand the hazards of chemicals or materials you are handling and follow all safety precautions.



### **HOT WORK**

Hot work, outside designated welding or hot work areas, may only take place with an approved permit.



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**Appendix D**  
**EHS Bridging Document Evaluation**

<b>EHS Requirement</b>	<b>Document Provided</b>	<b>Evidence Accepted (Y/N)</b>	<b>Action Required</b>	<b>Owner</b>	<b>Status Open/Closed</b>
EHS Policy signed by CEO					
ZERO Harm expectation statement					
EHS organizational structure					
EHS manager and/or site representative					
SIF risk assessment worksheet					
Communication plan					
Management of change					
Equipment					
Training					
Hazardous waste operations					
Personal protective equipment					
LIFEsavers					
100% Fall protection at 4 ft (1.2 m)					
Hazardous chemicals					
Electrical safety					
Emergency response					



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EHS Requirement	Document Provided	Evidence Accepted (Y/N)	Action Required	Owner	Status Open/Closed
Waste Management					
Permit to work					
Incident management					
Health management					
Respiratory program					
Continuous improvement					
Planning and observation					
Security					
Subcontractor selection and roles					
Drug and alcohol policy					
Corrective action policy					

CEO=Chief Executive Officer; EHS=environmental, health, and safety.



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## Appendix E Monthly Contractor Incident Statistics Report



CARGILL CONTRACTOR MONTHLY  
SAFETY REVIEW FORM (example)

Re-Released: 07/2014

This form is to be filled out monthly by each contractor performing work on-site. It must be submitted to Cargill Site/Project Manager by the 3rd day of the following month.

Contractor \_\_\_\_\_  
Year \_\_\_\_\_/Month \_\_\_\_\_

**Monthly Injury Summary:**

New Reportable Injuries - Not a SIF* actual or potential	New Reportable Injuries Actual SIF Current Month	New Reportable Injuries Potential SIF	Lost Time Injuries	Days Lost	Hours Worked	Fatalities	Type of Contractor
Current Month	Current Month	Current Month	Current Month	Current Month	Current Month	Current Month	1. Construction/Expansion 2. Consultant 3. Maintenance or Repair 4. Other 5. Sanitation/Housekeeping 6. Security 7. Service Contractor

\*A SIF (Serious Injury or Fatality) include fatalities, reportable life altering/life threatening injuries and reportable injuries with SIF potential

YTD Total Man-hours (CARGILL fiscal year June 1 – May 31\*) \_\_\_\_\_

As of the last day of the month, how many total employees do you have on site? \_\_\_\_\_

(US only) Have you updated your OSHA 300 log? \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



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**Appendix F**  
**Cargill Environment, Health and Safety Policy**



**ENVIRONMENT,  
HEALTH AND SAFETY POLICY**

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Cargill's policy is to conduct all business activities in a manner that protects the environment and the health and safety of our employees, contractors, customers, and communities.

**Environment.** Cargill will comply with all applicable environmental requirements, prevent pollution, and continually improve performance on criteria relevant to its businesses and operations.

**Health and Safety.** Cargill will comply with all applicable occupational health and safety, process safety, and product safety requirements, continually improve performance on criteria relevant to its businesses and operations, and insist that all work, however urgent, be done safely.

David W. MacLennan  
President and Chief Executive Officer

Al Johnson  
Vice President, Environment, Health and Safety



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## Appendix G SIF CRITERIA TABLE

**SIF Automatic Determination Criteria Table**

SIF Automatic Determination Criteria Table			
<b>Motor Vehicle-Traffic Safety</b>	<b>Working at Height</b>	<b>Mobile Powered Equipment (MPE)</b>	<b>Electrical Work</b>
<ul style="list-style-type: none"> <li>• Vehicle tip over/rollover</li> <li>• Any collision rendering vehicle inoperative</li> <li>• Collision head-on</li> <li>• Collision broad-side at intersection</li> <li>• Any motorcycle collision tip over/rollover during operation</li> <li>• Operator or passenger expelled from vehicle (e.g. auto, truck motorcycle)</li> </ul>	<ul style="list-style-type: none"> <li>• Actual Falls &gt; 1.2 m (4 ft.)</li> <li>• Potential Falls &gt; 1.2 m (4 ft.)</li> <li>• (Exposure to unprotected work surfaces or edges)</li> <li>• Exposure to Fall &gt; 1.2 m (4 ft.) using fall protection without designed or engineered anchorage point</li> <li>• Fall into or onto moving machinery/equipment</li> <li>• Fall onto impalement hazard</li> </ul>	<ul style="list-style-type: none"> <li>• MPE tip over/rollover</li> <li>• MPE contact with people</li> <li>• Collision with other MPE or vehicle</li> <li>• Driver body part contacts during operation</li> <li>• Early truck departure from loading dock or while truck being loaded or unloaded</li> <li>• Uncontrolled release of cargo</li> </ul>	<ul style="list-style-type: none"> <li>• Electrical Shock &gt; 50V circuit</li> <li>• Arc flash or blast</li> <li>• Use of portable equipment with no GFCI/RDC</li> <li>• Unintended exposure to live electrical</li> <li>• Failure to test/verify de-energization of circuit prior to work</li> <li>• Missing or damaged earthing/grounding or bonding</li> </ul>
<b>Lockout – Energy Isolation</b>	<b>Confined Space Entry</b>	<b>Bulk Material Handling and Storage</b>	<b>Railcar Safety</b>
<ul style="list-style-type: none"> <li>• All energy source(s) not completely or correctly isolated prior to work</li> <li>• Energy disconnects labeled incorrectly allowing potential for isolation of wrong equipment</li> <li>• Unauthorized removal of energy source(s) prior to the completion of the work</li> </ul>	<ul style="list-style-type: none"> <li>• Entry without required permit or properly executed permit</li> <li>• Any condition requiring evacuation of the confined space (e.g. entry without atmospheric testing, uncontrolled hazard identified in space, no attendant)</li> </ul>	<ul style="list-style-type: none"> <li>• Engulfed by product</li> <li>• On or near pile with cliff or bridge</li> <li>• On product pile with discharge running or not locked out</li> <li>• Significant bin or silo bridge</li> <li>• Bin/silo fire or significant smolder</li> </ul>	<ul style="list-style-type: none"> <li>• Tip over (Locomotive, trampoline)</li> <li>• High potential derailment event</li> <li>• Railcar contact with people</li> <li>• Collisions with other vehicles</li> <li>• Car puller rigging or cable failure</li> </ul>
<b>Excavation and Trench Work</b>	<b>Lifting and Rigging Protection</b>	<b>Hazardous Materials</b>	<b>Hot Work</b>
<ul style="list-style-type: none"> <li>• Trench/Excavation collapse</li> <li>• Unapproved entry into an excavation &gt;1.2 m (4 ft)</li> <li>• Improper excavation benching, shoring or sloping</li> <li>• Underground utility not identified prior to excavation</li> <li>• Any condition requiring trench or excavation evacuation (e.g. water infiltration, partial collapse, inappropriate egress)</li> </ul>	<ul style="list-style-type: none"> <li>• Crane tip over</li> <li>• Rigging or crane structural failure</li> <li>• Dropped load from a crane</li> <li>• Lift zone not barricaded or controlled</li> <li>• Walking/standing under a suspended load</li> <li>• Crane or rigging in contact with overhead electrical line or stationary structure</li> </ul>	<ul style="list-style-type: none"> <li>• Combustible chemical or dust explosion or fire</li> <li>• HHP Level 1 or 2 incident</li> <li>• Toxic chemical inhalation above allowable exposure limits</li> <li>• Significant hazardous chemical spill or release</li> <li>• Contact to eyes/face/torso with corrosive liquid</li> <li>• Contact to eyes/face/torso with steam or hot liquid &gt; 55C (131 F)</li> </ul>	<ul style="list-style-type: none"> <li>• Hot work performed without required or properly executed permit</li> <li>• Required fire watch not provided</li> <li>• Unexpected fire or smolder produced by hot work</li> <li>• Atmospheric testing not performed prior to or during hot work within a hazardous zone</li> </ul>
<b>Machine/Conveyor Guarding</b>	<b>Mining Operation</b>	<b>Animal/Biological</b>	<b>Dock/Barge/Ship Operation</b>
<ul style="list-style-type: none"> <li>• Exposure to unprotected power transmission or point of operation hazard</li> <li>• Unguarded belt head or tail pulley</li> <li>• Unprotected rotary valve opening</li> </ul>	<ul style="list-style-type: none"> <li>• Unplanned rock or roof fall</li> <li>• Unplanned infiltration of water or gas</li> <li>• Ignition of combustible gas or dust</li> <li>• Any condition requiring mine evacuation</li> </ul>	<ul style="list-style-type: none"> <li>• Fall from horse</li> <li>• Trampled, knocked over or fell on by large livestock</li> <li>• Contact with venomous insects, reptiles or other animals</li> </ul>	<ul style="list-style-type: none"> <li>• Fall into water</li> <li>• Fall into barge &gt; 1.2 m (4 ft)</li> <li>• Barge/Ship contact with people</li> <li>• Barge/Ship collision with dock</li> <li>• Barge/Ship collision with other vessel</li> <li>• Rigging or cable failure</li> </ul>
<b>Dropped Object</b>	<b>Violence</b>	<b>Equipment Failure</b>	<b>Contact with Sharp Objects</b>
<ul style="list-style-type: none"> <li>• Falling or dropped object (product, tools equipment, etc.) (<i>Use DROPS calculator, report as SIF if major or fatality</i>)</li> <li>• Work zone not protected from dropped objects</li> </ul>	<ul style="list-style-type: none"> <li>• Violence incident with gun, knife or other potentially lethal weapon</li> </ul>	<ul style="list-style-type: none"> <li>• Failure of equipment results in:               <ul style="list-style-type: none"> <li>• Rupture or explosion</li> <li>• Significant fire or smolder</li> <li>• Unintended release of energy</li> <li>• Structural failure</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Life-altering/threatening puncture or laceration</li> <li>• Unintended injection of material under the skin</li> </ul>



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**Appendix H  
Notice of EHS Non-Compliance**

**Notice of EHS Non Compliance**

To:

Site Representative for:

Your company has been found to be in non-compliance with one or more governing , or Owner EHS requirement(s), as specified below. This EHS non-compliance must be corrected immediately for your company to meet the requirements of your contract.

Description of Non compliance	Applicable EHS Requirements

Issued By (Build Project Manager or Operation Manager issuing the warning letter):

Name (Printed):	Title:
Signature:	Date:

Received By (Contractor Representative receiving warning letter):

Name (Printed):	Title:
Signature:	Date:

cc: Contractor Operations Manager  
EHS Manager



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**Appendix I  
Warning Letter for EHS Non-Compliance**

**Warning Letter for EHS Non- Compliance**

Project Name:

Business Unit:

Your firm, \_\_\_\_\_ has been found to be in violation of your contract by non-compliance with applicable governing or OWNER EHS requirements.

On \_\_\_\_\_ (date), in accordance with the Supplier EHS Adherence Policy, your representative, \_\_\_\_\_ was given a Notice of EHS Non-Compliance (copy attached). This notice specifies areas where your company does not comply with Federal, State, or Contractor HSE requirements, and requests that these items be corrected immediately.

If they are not corrected, more stringent measures will be taken in accordance with Cargill Supplier EHS Adherence Policy.

Your prompt attention to this matter will be appreciated.

Issued By (Project Manager or Site Manager Issuing Warning Letter):

Name (Printed):	Title:
Signature:	Date:

Received By (Subcontractor Representative Receiving Warning Letter):

Name (Printed):	Title:
Signature:	Date:

cc: Contractor Operations Manager  
EHS Manager



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**Appendix J  
Written Notice of Temporary Job Suspension**

**Written Notice of Temporary Job Suspension**

Your company, \_\_\_\_\_ while working on the \_\_\_\_\_ project has been notified of EHS performance deficiencies in accordance with Cargill Supplier EHS Adherence Policy.

Despite these written notifications requesting that immediate corrective action be taken to improve your EHS performance, improvement has not occurred.

Therefore, in accordance with Action Level Two of the SUPPLIER EHS Adherence Policy, we are hereby notifying you that after securing your equipment, all job activities on the project named above are to cease.

Activities on this project may be resumed only after your company meets requirements set forth in the Supplier EHS Adherence Policy.

Issued By:

Name (Printed):	Title:
Signature:	Date:

cc: BOSC Leadership  
Global Operations Leads  
EHS Leads

Contractor: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_