



CONTRACTOR PERSONNEL ONBOARDING PROCESS



TABLE OF CONTENTS

1. GENERAL INFORMATION	3
1.1 PROMAN ENERGY.....	3
2. ABBREVIATIONS	4
3. INTRODUCTION	5
4. SCOPE AND EXCLUSIONS.....	6
5. OBJECTIVES	7
6. RESPONSIBILITIES.....	8
7. PROMAN ENERGY REQUIREMENTS.....	9
7.1 SITE INDUCTION	9
7.2 MEDICAL INFORMATION	9
7.3 SECURITY CLEARANCE	10
7.4 TECHNICAL COMPETENCY	11
7.5 HSSE COMPETENCY	11
7.6 ACCESS APPROVAL	12
8. REFERENCES	13



1. GENERAL INFORMATION

1.1 PROMAN ENERGY

Proman Energy is an energy company focused on meeting the energy needs of Trinidad and Tobago. Proman Energy is the owner of Block 1(a) located offshore in the west coast of Trinidad. Proman Energy currently produces natural gas from the Iguana and Zandolie fields in Block 1(a) with two (2) unmanned platforms and a 45km pipeline to Proman Energy's Gas Processing Unit which is located onshore.



2. ABBREVIATIONS

BBS	Behavioural Based Safety
C&P	Contracts and Procurement
HSSE	Health, Safety, Security and Environment
OEUK	Offshore Energies United Kingdom
OHP	Occupational Health Physician
OSHA	Occupational Safety and Health Administration
PLEA	Point Lisas Energy Association
SCMER	Security Crisis Management and Emergency Response



3. INTRODUCTION

The Proman Energy Contractor Personnel Onboarding Process outlines the approach established by Proman Energy for onboarding Contractor Personnel. This document has been developed and will be owned by the HSSE Department.

This document outlines the onboarding requirements for contractor personnel who are required to complete work on any of Proman Energy's owned or operated worksites.

If the scope of work for a specific contract requires that additional HSSE or technical criteria be met by a Contractor (including Subcontractors), further guidance shall be provided by the relevant Contract Holder in consultation with the HSSE Department.

4. SCOPE AND EXCLUSIONS

This process applies to all companies providing services at any of Proman Energy's owned and operated locations; and those charged with the responsibility of overseeing the execution of work by contractor personnel. It also applies to all persons assisting in facilitating the inductions of and issuing badges to contractor personnel.

For offshore/offsite work, the nature of the contract will guide the onboarding requirement. If, by contractual agreement, the worksite is under the control of Proman Energy, then all contractor personnel will be required to meet Proman Energy access requirements and be badged. If, by contractual agreement, control of the worksite is with the contractor, then their onboarding process will apply, and Proman Energy personnel will be subject to the contractor's requirement if they are to access the worksite.

This procedure does not apply to delivery personnel and visitors to any of Proman Energy's facilities. These categories of personnel will not be permitted to conduct any physical work and visitor badges with a site induction will be used to manage these personnel whilst on site.

5. OBJECTIVES

This process aims to establish the minimum requirements for onboarding of all contractor personnel.

The overarching objective of this framework would be to ensure and verify the medical fitness for work, technical and HSE competencies as well as the security risk of all contractor personnel performing work at any Proman Energy operated or controlled location. The Proman Energy onboarding process also generally requires the contractor to accept specific operational and value principles established by Proman Energy.

6. RESPONSIBILITIES

The HSSE Advisor shall be the Single Point of Accountability for maintaining and driving continuous improvement to Proman Energy's contractor onboarding framework. He/she shall also assume overall responsibility for providing general guidance to contractor management and contractor personnel together with ensuring that Proman Energy provides suitable support, advice, and awareness interventions on contractor onboarding to all stakeholders where applicable. He/she will also be responsible for update and management of the data base of all contractor personnel.

Each review and approval stage in this process outlined below, will identify the role within Proman Energy that will be responsible for delivery of the stated objectives.

7. PROMAN ENERGY REQUIREMENTS

The onboarding of all contractor personnel shall be managed by the HSSE Department. A spread sheet shall be developed outlining all relevant requirements (personal, technical, HSSE) and shall be used to record the status of conformance of individuals against each specific requirement applicable to the role that the individual is required to perform at Proman Energy's worksites. One line of records shall be maintained for each contractor personnel. This will allow for tracking and management of the individual over time within our contractor personnel database.

To facilitate effective review of submissions and determine suitability for access and work on any Proman Energy operated or controlled location, all information must be submitted to the HSSE Team no less than seventy-two (72) hours in advance of the intended access date. This time frame does not include weekends or public holidays.

Onboarding information includes:

7.1 SITE INDUCTION

The contractor shall be responsible for submission of an email address for each of their personnel (including subcontractor personnel) that they intend to bring to a Proman Energy site. Once provided, HSSE will issue each person an individual link to the Proman Energy Site Induction Application (App), with instructions to complete the site induction module/s applicable to each location that the individual is proposed to visit and/or perform work.

7.2 MEDICAL INFORMATION

MEDICAL FITNESS FOR WORK

All personnel shall be required to submit a completed OEUK medical evaluation performed by an accredited OEUK Medical examiner and with no less than three (3) months remaining validity. The fitness for work card or certificate shall be submitted along with a detailed report which is required for review by the company's Occupational Health Physician (OHP), to determine any areas of medical concern that may present a risk to Proman Energy or the individual in performance of their tasks at Proman Energy's worksites, if the individual can be approved for unrestricted work or if restrictions need to be applied as it relates to the specific job requirements.

Where applicable, results of additional medical evaluation specific to the intended role/s as defined in the Proman Energy Fitness for Work Procedure (PEL1-GEN-PEL-HS-PRD-0001), shall also be submitted for review by the OHP.

From time to time, based on extenuating medical circumstances, completion of any additional medical screening that may be required (e.g., Covid-19 Medical Screening questionnaire); if these circumstances arise, the requirements shall be formally communicated to the contract holder or through the C&P department for application.

The method for submission, review and approval shall follow the process outlined in section 6.2.3 below.

DRUG TESTING

All contractor personnel shall be required to complete and submit a drug test in alignment with Proman Energy's Drug Alcohol and Substance Abuse Policy (DEL1-GEN-DEL-HS-POL-0001). The report submitted must contain the suite of substances tested for and the related cut off values applied.

All submitted reports shall be no older than three (3) months prior to the intended date of coming to site. The method for submission, review and approval shall follow the process outlined in section 6.2.3 below.

Once given access to Proman Energy worksites, all contractor personnel shall be subject to the Proman Energy drug testing program including random drug and alcohol testing as outlined in the Drug Alcohol and Substance Abuse Policy.

MANAGEMENT OF CONTRACTOR PERSONNEL MEDICAL INFORMATION

In accordance with the Trinidad and Tobago Data Protection Act 2011 (Act No. 13 of 2011), medical information (physical and/or mental) is defined as sensitive personal information. In accordance with section 76 of the act, medical information shall only be processed following the consent of the person to whom that medical information relates or by a health care professional or an employee or agent of a health care body at the direction of a health care professional.

Contravention of the requirements of the Act is an offence and both individuals involved, and the corporation involved can be fined (Section 95 and 96).

To ensure compliance with the Act, all medical information shall only be collected, processed, and distributed upon written consent (copy made available upon request) of the individual.

In support of delivery of the Proman Energy Medical Fitness requirements, an electronic version of medical information (fitness for work testing results, additional medical evaluation, drug testing results etc.) shall only be communicated from the medical provider utilized by the contractor (in appropriate cases), or the contractors inhouse or contracted medical personnel, directly to the Proman Energy OHP via email to med.infopromanenergy@proman.org. The OHP shall review and submit his findings to the contractor and the HSSE Manager who will inform the relevant internal stakeholders, in writing via email, of the outcome of the evaluation.

Proman Energy, under the guidance of its inhouse OHP, will supply all contractors with a list of Occupational Health Physicians that Proman Energy will accept OEUK fitness for work assessments from. At a minimum, these doctors shall be duly registered, and their names must appear on the OEUK list of doctors registered to perform OEUK medicals. Any additional competency or other requirements based on the Proman Energy fitness for work procedure will be outlined by the Proman Energy OHP.

These occupational health providers will be required to securely retain the medical records of all persons they assess, for the required regulatory periods. They must also be capable of electronic transmittal of medical records directly to the Proman Energy OHP.

All contractors performing work for Proman Energy, shall be required to ensure that systems are in place to retain medical records for all their employees as per regulatory requirements, and make these records available to the Proman Energy OHP upon request.

All submitted personal medical information shall be stored by the Proman Energy OHP into a secure SharePoint folder, which will be managed by the Proman Energy OHP.

Contact information for the Proman Energy OHP shall be provided by the Proman Energy HSSE Department.

7.3 SECURITY CLEARANCE

To safeguard staff and property, assess potential risks, and uphold workplace security, it is necessary to conduct appropriate background checks with accurate, auditable records for proposed contractor personnel. This will include the provision of evidence of individual police records. Contractors will be required to provide a certificate of character, no older than three (3) months, for all proposed personnel they intend to bring to any Proman Energy worksite.

Information as to the criminal history of an individual is classified as personal information under the Trinidad and Tobago Data Protection Act 2011. As such, all information related to the security history of contractor personnel shall be submitted by the contractor directly to the Proman Energy Security Crisis Management and Emergency Response (SCMER) Advisor via email to coc.infopromanenergy@proman.org. for review and approval.

Upon review and approval by Proman Energy Security personnel, feedback will be provided to all stakeholders on access approval for the individual.

All submitted personal security information shall be stored in a secure online folder, under the solely managed by the Proman Energy SCMER Advisor or delegate.

7.4 TECHNICAL COMPETENCY

Evidence of technical competency consistent with the intended role that the individual is expected to perform shall be submitted by the contractor to the relevant contract holder. The submissions shall be reviewed in line with the defined technical competencies for the intended role. Once the submissions meet the defined expectation, the contractor holder shall communicate to the HSSE team, their approval of the individual and the specific role ONLY for which they are approved. This approval and information shall be entered on the onboarding spreadsheet.

If the individual is intended to perform multiple roles, evidence of technical competency for each intended role shall be submitted for review. Once the submissions meet the defined expectation, for each intended role, the Proman Energy contract holder shall communicate to the HSSE team, their approval of the individual and the specific roles for which they are approved. This approval and information shall be entered on the onboarding spreadsheet.

All submitted proof of technical competency shall be stored securely within Proman Energy's document management system.

7.5 HSSE COMPETENCY

HSE TRAINING

Contractor personnel introduce HSE risk associated with the role and activities that they have been onboarded to perform at Proman Energy. To manage this introduced risk, it is important that personnel possess an understanding of the associated hazards and controls that can be used to reduce the risk, and the established work processes that will be utilized to safely execute their task.

As proof of this understanding, contractors shall be required to provide proof of basic HSE related training (e.g., PLEA passport, OSHA 10-hour training program, hazard identification, contractor specific internal basic HSE awareness program etc.).

Evidence shall also be provided of training specific to the management of risk associated with their intended role (e.g., working at height, confined space entry, defensive driving, manual handling, rigging, lifting, etc.).

The contract holder shall provide evidence of applicable specific HSE related training required for each role to be onboarded.

Contractors shall submit all proof of HSE competency to the Proman Energy HSSE Team for review and approval. All submitted information shall be stored in a secure online folder, under the control of the HSSE Team.

PROMAN ENERGY SPECIFIC HSSE AWARENESS

Proman Energy has established approved policies, standards, and guidelines to support the management of work-related risk on its owned and operated sites. The requirements outlined in these approved documents are critical to the maintenance of a safe working environment, protection of the natural environment in which we operate and maintaining the safety of the community in which we operate.

All contractor personnel shall be required to strictly adhere to all Proman Energy safe work requirements. To ensure that contractor personnel are aware of site requirements applicable to their role, a Proman Energy HSSE representative shall be responsible for the roll out of all site HSSE requirements (process safety fundamentals, lifesaving rules, safe work practices, control of work etc.).

Proman Energy requires that contractor personnel also support its behaviour-based safety (BBS) program. In support of this the contractor shall provide evidence of their personnel being trained in a suitable BBS program, Proman Energy shall provide an awareness roll out of its BBS program to facilitate contractor personnel participation.'

7.6 ACCESS APPROVAL

To enable site access approval, each contractor personnel shall be required to satisfactorily meet all the outlined requirements. Failure to meet any off these requirements shall result in access being denied.

Once all approval requirements have been met, the individual will be allowed to be badged. To verify the identity of the individual at the time of badging, the approved individual shall be required to present to the badging operator, a valid national photo identification (drivers permit, national identification card, passport) and shall be required to take a photo to facilitate processing of access card (badge). Note, company issued photo identification is not an acceptable form of identification to facilitate the Proman Energy badging process.

Badges issued shall contain the following information:

- A coloured head shot of the individual to whom the badge is issued.
- Full name of the individual to whom the badge is issued.
- The role that the individual is approved to perform.
- The contracting company that the individual represents.

The duration of validity of the badge issued shall be based on the nature and duration of the contract and the activity that the individual is required to perform.

All badges remain the property of Proman Energy and shall be returned to security personnel upon completion of the approved assignment.

8. REFERENCES

- Proman Energy Drug Alcohol and Substance Abuse Policy (PEL1-GEN-PEL-HS-POL-0005_R0).
- Proman Energy Medical Records and Patient Confidentiality Policy (PEL1-GEN-PEL-HS-POL-0002).
- Proman Energy Fitness for Work Policy (PEL1-GEN-PEL-HS-POL-0003_R0).
- Proman Energy Fitness for Work Procedure (PEL1-GEN-PEL-HS-PRD-0001).
- Facility Security Plan Gas Processing Unit (DE1A-GPU-HS-PLN-0003).
- Electronic Access and Key Control Procedure (DE1A-GPU-HS-PLN-0005).
- PLEA drug and alcohol laboratory testing certification scheme (<https://energynow.tt/training#plea-drug-and-alcohol-laboratory-testing-certification-scheme>).
- OEUK Doctors Registry (<https://oeuk.org.uk/doctors/find-a-registered-doctor/uk-doctors/>).