
Contractor EHS Management

Applicability:	Corporation
Originator:	Spectra Energy Transmission EHS
Approval:	Vice President, EHS
Approval Date:	January 1, 2007

Effective Date:	January 1, 2007
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Statement of Purpose and Philosophy

Spectra Energy Transmission is committed to a safe, healthy workplace and to protecting the environment. Our employees and contractors are expected to perform their daily assignments safely and in a manner that meets all applicable environmental requirements.

Safety is always the first consideration of any assignment. It is not an option. As such, employees and contractors must apply safe work practices to our activities and exercise good judgment in our work decisions.

Our objectives under this policy are to continually improve contractor EHS performance and to implement an integrated approach that will promote this commitment. These objectives can be achieved by executing the Contractor EHS Management Policy and by enhancing safety awareness for all persons working on our sites.

Core Policy Expectations

EHS performance of contractors impacts Spectra Energy Transmission. Ensuring that contractor introduced risks are managed appropriately is a complex process that requires coordination and cooperation between various functional areas within the Corporation.

Spectra Energy Transmission will, therefore, strive to prevent or limit potential Contractor introduced EHS risks by:

- Defining roles, responsibilities, accountabilities and ensuring functional area integration
- Identifying EHS risks associated with contractor services before a project is outsourced
- Identifying, pre-qualifying, and selecting prospective contractors on the basis of EHS risk associated with the work and EHS, financial, and other relevant performance criteria
- Creating contracts that provide the appropriate level of EHS and legal protections, and reflect enforceable EHS performance expectations for contractors
- Communicating and reviewing contractual terms, conditions, and other expectations to all relevant stakeholders prior to initiation of work activity
- Reviewing and approving contractor EHS work and communication plans, developed in advance of work, that consider the hazards associated with their work, equipment, and products
- Ensuring adequate internal and external oversight controls are applied to the project
- Reviewing and communicating post-project contractor performance to others in the Corporation

In order to continually improve our contractor EHS management processes, we will periodically review and update this Policy as appropriate.

Accountability: Roles and Responsibilities

Operating companies are expected to identify and mitigate contractor related EHS risks that impact Spectra Energy Transmission employees, operations, facilities, and equipment through conformance with this Policy. Resources will be allocated and provided to effectively execute the expectations described in the Policy and related documentation.

Operating companies' contractor EHS management program documentation and practices will reflect how policy expectations and related implementation guidance are being addressed. Operating companies' programs will be reviewed and updated periodically to reflect changes in Policy requirements and/or implementation needs.