

## SHORT SERVICE EMPLOYEE MANAGEMENT PROGRAM

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**TABLE OF CONTENTS**

1. PURPOSE ..... 1

2. ROLES AND BACKGROUND ..... 1

3. ORIENTATION, TRAINING, AND CLEARANCE ..... 2

4. NOTIFICATIONS AND RESPONSIBILITIES ..... 3

5. SHORT SERVICE EMPLOYEE MANAGEMENT PROGRAM EXCEPTIONS ..... 4

6. PROGRAM COMPLETION ..... 5

7. SUBCONTRACTORS..... 5

**APPENDICES**

- Appendix A – Short Service Employee Training and Assignments Documentation Form
- Appendix B – Roux SSE Exception Form
- Appendix C – Short Service Employee Mentor Documentation Form

## 1. PURPOSE

This program has been implemented to ensure that Roux and Subcontractor short service employees are identified, appropriately supervised, trained, and managed in order to prevent accidents such as personal injury, injury to others, environmental damage, and/or property damage. This is a requirement for all employees and subcontractors throughout the firm. In addition, there are other requirements specific to ExxonMobil policies for all their projects, which are identified where applicable below.

## 2. ROLES AND BACKGROUND

### Short Service Employee (SSE)

A Roux employee or a Roux subcontractor employee with less than six (6) months continuous service in the same job type or less than six (6) months continuous service with his/her current employer is a Short Service Employee (SSE).

The Roux SSE process was developed and periodically updated to satisfy all expectations included in ExxonMobil's Environmental Services Short Service Worker Guidance. Roux senior management will, at a minimum, perform an annual assessment of the Short Service Employee Management Program to determine its effectiveness and identify improvement opportunities. It should be noted that ExxonMobil refers to SSE as Short Service Workers or SSWs. For all ExxonMobil projects, a SSE is defined as a Roux employee or a Roux subcontractor employee with less than six (6) months of ExxonMobil worksite experience or has not worked on an ExxonMobil worksite in the last two (2) years.

SSEs shall not exceed 50% of Roux's workforce at any job site without prior written approval from the Office Manager (OM) and, when required by client contract or program, approval from the designated client representative.

The SSE process excludes workers not performing physical work onsite, visitors, regulatory agency staff, client employees or affiliates, and members of contractor management staff. In addition, certain elements of this SSE process may not be appropriate for short-duration workers (i.e., specialized workers onsite for a short period of time to perform a very specific task and unlikely to return). If the SSE process is deemed not appropriate, the individual Project Manager will develop a case-specific risk mitigation plan to address these short duration workers or consider subcontracting the task through a long-duration contractor who has an effective SSE program.

### Site Safety Mature Person (SSMP)

An SSMP is a worker who is working on an ExxonMobil site that has demonstrated knowledge and skills with regard to site hazards, hazard management, and safe working practices, and is qualified to act as an SSMP. Our "graduation" process includes administration of an LPS® written test followed by a one-on-one interview with a senior safety or project manager of the project team to ensure competence. Graduation to a SSMP typically takes (6) total months of applicable work at ExxonMobil sites. Graduation in less than (6) months requires approval by the ExxonMobil PM.

### Mentor

A Mentor is a designated person(s) who is responsible and accountable for guiding and monitoring performance of SSEs in the field. The Mentor cannot be another SSE. The Mentor can be a member of the same working team, but should not be an employee of ExxonMobil or any of its affiliates. The Mentor is a SSMP and has

demonstrated knowledge and skills with regard to site and task-related hazards, hazard management, and safe working practices and is able to communicate with the SSE. The Mentor is trained and knowledgeable of Loss Prevention System (LPS) tools such as LPSAs, LPOs (RPOs) and JLAs (JSAs). The Mentor should have a positive safety attitude and understanding of both ExxonMobil's and Roux's corporate safety cultures. The Mentor should be capable of practicing Safety Leadership skills, but does not necessarily have to be the SSE's Supervisor. The Mentor should have received appropriate training and be qualified for the role by Roux management. The Mentor is expected to either be onsite with the SSE or assign a SSMP to be onsite with the SSE until the SSE graduates and becomes a SSMP. Deviation from a Mentor or SSMP being onsite with the SSE while conducting field operations requires approval by the Project Principal or the Client PM (in the case of ExxonMobil work).

### **Supervisor**

A Supervisor is the designated person(s) who is responsible and accountable for the overall stewardship of the SSE Management Program for each project or office. The Supervisor shall be a senior member of the Roux management team.

## **3. ORIENTATION, TRAINING, AND CLEARANCE**

### ***Pre-Assignment Orientation, Training, and Clearance***

An initial First Day employee orientation is required before the SSE can perform any fieldwork. Orientation must be conducted by the OM or the designated Supervisor of the SSE. The initial orientation shall, at a minimum, communicate the following information:

- Even though risks do exist, accidents and injuries are preventable;
- Each worker has a personal responsibility for his or her safety and the safety of others both on and off the job;
- No business objective is so important that it will be pursued at the sacrifice of safety;
- Safe conduct is a condition of employment;
- Work is done well only if it is done safely;
- Roux employees are expected to have the best safety performance;
- Review of Roux's Safety Procedures and Practices;
- General requirements for Personal Protective Equipment;
- Injury reporting and medical follow-up procedures;
- Requirements regarding participation in safety meetings, Safe Performance Self Assessments (SPSAs), pre-job Job Safety Analyses (JSAs), and the Loss Prevention Observation (LPO) / Roux Peer Observation process; and
- Requirements of this SSE Management Program.

Other pre-assignment training (or verification of prior training) is also typically required and will be determined by the OM and Supervisor of the SSE. Examples of this additional training include OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) training, one-one-one Safety and Procedures Review with the Office Health and Safety Manager (OHSM), client-specific training program requirements (i.e., LPS®, railroad

worker safety, etc.), and job skills training requirements specific to immediate job tasks (i.e., various field procedures training, equipment usage, etc.).

Medical clearance and drug testing clearance are also required prior to the performance of field work on some sites.

### ***Project and Site-Specific Orientation and Training***

Many Roux projects have different requirements that are client-specific or site-specific in nature. It is the responsibility of the Project Principal (PP) (or Project Manager [PM] if delegated this responsibility by the PP) to ensure the SSE assigned to his/her projects is provided orientation and training with respect to these client and/or site-specific requirements. Minimum site-specific orientation shall include operations overview, review of the site-specific HASP, emergency action plan, facility sign-in and sign-out, hazard identification and reporting, MSDS information and H<sub>2</sub>S if applicable. In addition, any restrictions on communications with non-Roux personnel, site access, or operation of site equipment (both Roux and Client owned) should be reviewed.

Client-specific and site-specific orientation topics shall also include work permit training, reporting incidents and hazards, emergency response procedures, appropriate PPE requirements, and general importance and use of LPS® tools (including a client's Core Safety Expectations and consequences).

### ***Additional SSE Training***

While classified as an SSE, it is the employee's responsibility to actively seek out and participate in available training opportunities. The SSE will utilize the attached SSE Form to track the completion of training and other experience gained while an SSE. Specific training that is recommended to be completed within the first six (6) months of employment in order for the employee to graduate from SSE status is listed on the SSE Form. Individuals completing the training are required to sign-off on each type of training.

## **4. NOTIFICATIONS AND RESPONSIBILITIES**

The following individuals have responsibilities for notification under this program.

**Office Manager (OM) and SSE Supervisor:** Have the responsibility of notifying the PP when a SSE employee is assigned to his/her project. They also have the responsibility of confirming field assessments are conducted to verify the effectiveness of the SSE's performance.

**SSE:** Roux employees who are SSEs are required to identify themselves as such to the Roux PM prior to reporting to the job Site and to provide the PM with an up-to-date copy of his/her Roux SSE Training and Assignments Documentation Form. SSEs are required to wear company-supplied fluorescent green hard hats (or other project-specific distinct identification) when in the field in order to be easily identifiable.

**Project Principals (PPs) and Project Managers (PMs):** PPs are responsible for notifying the PM when a SSE is assigned to his/her project and for ensuring the requirements of this SSE Management Program are adhered to on their projects. When required by Client contract or program, the Roux PP (or PM if delegated this authority by the PP) shall provide applicable notice to the client's designated representative regarding SSE's being assigned to fieldwork. The notice should be completed in advance using any applicable client SSE notification forms and shall be acknowledged / approved by the client representative prior to the SSE commencing work.

The Roux PM shall notify the Field Manager/Supervisor who will be responsible for field mentoring/training of the SSE on their project and for making sure everyone on the job Site is aware that SSEs are present. All personnel are expected to help the SSE and to explain potential hazards before each job. The Roux PM shall maintain a list of SSE workers, their entry date and date that they complete the SSE process.

The PP and PM shall ensure the requirements of this SSE Program are implemented for all subcontractor employees performing field work on the Firm's projects.

**Mentor:** The PP (or PM if delegated this authority by the PP) must designate an on-Site Supervisor for the SSE. A Mentor shall be capable of demonstrating safety leadership, will not currently be a SSE, have a positive safety attitude, will be capable of providing effective training / coaching, and will have good communication skills. The Mentor will have a positive safety attitude, will be motivated and is to have good knowledge of client-specific and site-specific safety programs/culture and requirements (e.g., ExxonMobil LPS® program). An SSE may only work under the direct on-Site supervision of the designated Supervisor who, as one of his or her duties, serves as a mentor/trainer in safety for the SSE. The on-Site Supervisor or Mentor must provide close supervision and not allow the SSE to perform any task in which the SSE has not been properly trained. The on-Site Supervisor will review with the SSE any hazards associated with the task and review all emergency equipment and response procedures. The Mentor must actively work with and engage the SSE on a daily basis to provide mentoring and monitoring of the SSE with respect to safe work practices and identification of hazards.

Site-specific Mentor responsibilities shall also include applicable work permit training, reporting of incidents and hazards, emergency response procedures, appropriate PPE requirements, and general importance and use of LPS® tools. At the completion of each field assignment, the on-Site Supervisor/Mentor will complete the applicable section of the employee's SSE form to document the work experience and provide feedback to the Project Manager as well as the OM and Project Principal regarding the SSE's performance and capabilities.

## 5. SHORT SERVICE EMPLOYEE MANAGEMENT PROGRAM EXCEPTIONS

Any exception to this Short Service Employee Management Program must be approved in writing by the OM and PP and, when required by client contract or program, by the designated client representative. An exception to the on-Site Supervisor / Mentor requirement and 50 percent SSE limitation may be granted for activities typically performed by one Roux employee (e.g., fieldwork oversight, field inspections, etc.). To be eligible for an exception, the employee must have had training and demonstrated prior experience in the specific work area. Furthermore, the PM shall provide additional communications during the course of each day to review safety requirements and work progress to ensure work is being performed safely and in accordance with expectations.

An exception to the 50% SSE limitation may be granted for work that requires increased staffing levels by Roux or Roux subcontractors (e.g., construction projects). The exception request must be submitted in writing, using a form similar to the attached Roux SSE Exception Form, by the contractor, outlining SSE expectations limitations, types of work to be performed, and mitigative measures that will be taken to minimize risks associated with the increased utilization of SSEs. The exception request must be approved by the OM and, when required by client contract or program, approval from the designated client representative.

Exceptions to the Short Service Employee Management Program at ExxonMobil sites must be approved in writing by the ExxonMobil Project Manager.

## **6. PROGRAM COMPLETION**

To be removed from SSE status, the OM and the SSE's Supervisor must be convinced the SSE has a working knowledge of both Roux and any applicable client Safety Policies and has demonstrated safe work practices and behavior. In addition, the SSE must have completed all required initial SSE training (as documented in his/her SSE Form) and have performed all activities without a serious loss incident (i.e., property damage, OSHA-Recordable injury). At that time, if the OM and Supervisor are convinced of the SSE's capabilities, the OM may remove the employee from the Roux SSE process by completing and signing the applicable section of the employee's SSE Form. The signed form will then be forwarded to Human Resources to be included in the employee's personnel file. If the SSE has been actively working on a client site under client-specific SSE requirements, the PM may need to obtain approval from the client representative as well.

If within six (6) months, the SSE is not capable of demonstrating the appropriate level of task, project, or safety knowledge, they shall be restricted from performing field activities until a point in time when they qualify to do so or are to be removed from the site.

For those SSE workers performing work at ExxonMobil worksites, they will have to successfully complete an LPS® assessment and demonstrate sufficient knowledge to complete the SSE requirements and be removed from the SSE process. Prior to being removed from SSE status workers performing work at ExxonMobil worksites will at a minimum complete the following:

- SSE shall participate in creating a minimum of one JSA;
- SSE shall identify and prepare two near loss reports, including participation in the root cause analyses;
- SSE shall perform and communicate a minimum of twenty SPSAs to a peer or manager;
- SSE shall lead a minimum of two toolbox safety meetings; and
- SSE shall participate in two LPOs as observee or observer.

SSEs will also complete a one-on-one interview with their associated Supervisor to confirm that they are ready to complete the program. At ExxonMobil sites, completion of the SSE program in less than six months needs to be approved by the ExxonMobil Project Manager.

## **7. SUBCONTRACTORS**

All subcontractors who supply field personnel to Roux job sites must implement a program that meets or exceeds the expectations described above as well as any additional requirements that may be required on a client or site-specific basis.



### Appendix A – Short Service Employee Training and Assignments Documentation Form

#### I. SSE Information

SSE Name: \_\_\_\_\_ Current Job Title: \_\_\_\_\_

Date of Employment: \_\_\_\_\_ Experience: \_\_\_\_\_ Years Current Position Experience: \_\_\_\_\_ Years \_\_\_\_\_ Mos.

SSE On-site Mentor(s): \_\_\_\_\_ Designated SSE Supervisor: \_\_\_\_\_

#### II. Orientation, Training and Clearance

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First Day  
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Requirement	Date Completed	SSE Initial	Mentor Initials	Supervisor Initials
Drug and Alcohol Screening	_____	_____	_____	_____
OSHA Medical Surveillance Physical Exam	_____	_____	_____	_____
OSHA 40-Hour HAZWOPER Training	_____	_____	_____	_____
Roux Corporate Health and Safety Manual Review	_____	_____	_____	_____
Safety, Policies, and Procedures Orientation with OM or SSE Supervisor (including required PPE)	_____	_____	_____	_____
LPS® Initial Training	_____	_____	_____	_____
Emergency Response Procedures Review	_____	_____	_____	_____
Completion of 20 LPSAs/Safety Assessments	_____	_____	_____	_____
Completion of 2 LPOs/RPOs (Roux Peer Observations)	_____	_____	_____	_____
Completion of 2 LI/NLI	_____	_____	_____	_____
Client Work Permit Procedures	_____	_____	_____	_____
Client-Specific Training (LPS, LIRR, Amtrak, NJ Transit)	_____	_____	_____	_____
Defensive Driving (i.e., Smith System)	_____	_____	_____	_____
Field Notebook	_____	_____	_____	_____
Subcontractor Oversight	_____	_____	_____	_____
Field Manager / SHSO	_____	_____	_____	_____
Lead 2 Toolbox Safety Meetings	_____	_____	_____	_____
Job Safety Analysis (create 1 new JSA/Modify Site JSA)	_____	_____	_____	_____

#### III. Field Assignments (Attach additional sheets for each additional assignment while SSE)

Site	From:	To:	Onsite Mentor	Supervisor
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

#### IV. Release from SSE Status

Based upon the SSE's successful completion of the above training and assignments, the SSE's Mentor(s), Supervisor, and OM indicated below have been convinced that the SSE has a working knowledge of both Roux and any applicable Client Safety Policies, and has demonstrated safe work practices and behavior. Additionally, the SSE has completed all applicable SSE training (as documented above) and performed all activities without a serious loss incident (i.e., property damage, OSHA recordable injury). The individual is thereby removed from status as an SSE.

\_\_\_\_\_  
(SSE Mentor(s))

\_\_\_\_\_  
(SSE Supervisor)

\_\_\_\_\_  
(Office Manager)

\_\_\_\_\_  
(Date)



## Appendix B – Roux SSE Exception Form

This form is to be filled out and approved by the Roux Office Manager and Project Principal whenever the on-Site Supervisor requirement and/or 50% SSE limitation will not be met on the project.

### IV. Variance Information

Variance Justification: (What are the current circumstances and what will be done to ensure an acceptable level of risk?)	
Alternatives to Variance: (If the variance is denied, what are the alternatives to completing the scope of the work? Briefly detail the cost and operational impact of the alternatives.)	

List the steps to be taken to manage the SSE risk to an acceptable level:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_
9. \_\_\_\_\_
10. \_\_\_\_\_

### V. Variance Review and Approvals

Variance Expiration Date: \_\_\_\_\_

Project Principal	<input type="checkbox"/>	Approves	<input type="checkbox"/>	Denies
Signed: _____	Date: _____			
Office Manager	<input type="checkbox"/>	Approves	<input type="checkbox"/>	Denies
Signed: _____	Date: _____			

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## Appendix C – Short Service Employee Mentor Documentation Form

### I. Mentor Information

Mentor Name: \_\_\_\_\_ Current Job Title: \_\_\_\_\_

Date of Employment: \_\_\_\_\_ Experience: \_\_\_\_\_ Years Current Position Experience: \_\_\_\_\_ Years \_\_\_\_\_ Mos.

### II. Demonstrated Experience

The mentor of any SSE will have demonstrated the following as endorsed by their supervisor or Office Manager.

#### Requirement

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- Is not a Short Service Employee
- Is LPS® trained and is capable of providing quality review of LPS® tools effectively
- Demonstrates proper usage of SPSAs and actively coaches others
- Has developed multiple JSAs
- Understands emergency response procedures and can explain them to others
- Is proficient in preparing and reviewing work permits
- Understands injury reporting and case management responsibilities and is capable of explaining them to employees and subcontractors
- Has working knowledge of hazard identification, near loss, and loss reporting and has participated in multiple near loss investigations
- Demonstrates the ability to intervene when required during project execution
- Leads Toolbox Safety Meetings as part of project execution

### III. Approval of Employee to Participate in SSE Program as a Mentor

Based upon the employee's demonstration of the above attributes, the employee's Supervisor / OM indicated below has been convinced that the employee is capable of being an effective Mentor as part of the SSE Program.

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(Supervisor / Office Manager)

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(Date)