GLOBAL HSE BLUEBOOK

AtkinsRéalis

Bluebook

Document No.:	2-HS-AML-001
Version:	02
Governance Owner:	SVP Global HSE
Approved by:	Chief Risk Officer, Project Performance and Risk Oversight
Approval Date:	2024-10-11
Revision Date:	2024-10-11
Issued by:	Global HSE
Issuance Date:	2024-10-11

Purpose

The purpose of this **manual** is to define **AtkinsRéalis'** approach to Health, Safety, Environment (HSE).

This **manual** is the foundation for **AtkinsRéalis'** Global HSE Management System (GHSEMS). It is the governing company document that outlines **AtkinsRéalis'** expectations for a common and consistent approach to HSE management based on ISO 45001 and ISO 14001 standards.

Revision Index

Version	Issuance Date	Revision Details
01	2024-08-30	Former BlueBooks used to be a collection of HSE documents and part of it was the Global HSE Management System (GHEMS). This new version consists solely of the GHSEMS, hence version 01. New rebranded format and SNC-Lavalin replaced by **AtkinsRéalis**. In this version, the following HSE **governance documents** are referenced but were physically removed from the BlueBook: HSE Indicators, Critical Risk Control Protocols and Best Environmental Management Practices. Sections on Thrive wellbeing framework and the Thrive Leadership program were added. Sections on roles and responsibilities were brought back. HSE global assurance audit section was revised to give details pertaining to the different type of audits.
02	2024-10-11	The inclusion of Serious Injury or Fatality (SIF) analysis was added, and the concept of High Potential Incident was removed.

The global glossary and the links to the HSE governance documents can be found solely on our intranet. The most recent versions of our governance documents and definitions as found on our intranet have precedence over those found at any other location (including here).

Users must always verify that they use the most current version
available at atkinsrealis.com/internal-governance-library

AtkinsRéalis - Baseline / Référence

2

Table of Contents

Users must always verify that they use the most current version
available at atkinsrealis.com/internal-governance-library

AtkinsRéalis - Baseline / Référence

3

Users must always verify that they use the most current version
available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence   4

1. Scope

The **scope** of this **manual** is defined in the Global Glossary.

2. Audience

This **manual** (also referred to as BlueBook and Global Health, Safety and Environmental Management System (GHSEMS)) applies to all **AtkinsRéalis sectors**, **regions**, **global businesses**, **projects**, and **personnel** regardless of work location.

All **AtkinsRéalis sectors**, **regions**, **global businesses**, and their **controlled workplaces** (offices, **projects**, operations) must implement and demonstrate compliance to the GHSEMS.

For **non-controlled workplaces**, **AtkinsRéalis** maintains responsibility for the Health, Safety and Wellbeing of its employees and our Environmental Impacts. This **manual** will not apply to these **non-controlled workplaces**, but instructions need be provided to our **employees** to manage Health, Safety and Environment (HSE) **risks**. The basis of these instructions can be found in the Requirements for Non-Controlled Workplace **work instruction**.

3. Definitions

All terms in **bold and italics** are defined in the Global Glossary. All other capitalized terms are defined in Appendix A.

4. Context

AtkinsRéalis is a world leading design, engineering and **project** management organization. We have a primary focus across eight end markets: Transportation, Buildings & Places, Defense, Minerals and Metals, Water, Power & Renewables, Industrial and Nuclear.

These services are delivered through a complex organizational arrangement and operating structure and through both internal and external agreements that include:

- A corporate overhead organization
- A complex arrangement of legal entities arranged around lines of business and the nuclear **sector**, **regions** and **global businesses**
- Wholly owned and partially owned subsidiaries
- **Projects** that are organised as:
  - **AtkinsRéalis** controlled and self-performing **project** organizations
  - **AtkinsRéalis** controlled partnerships
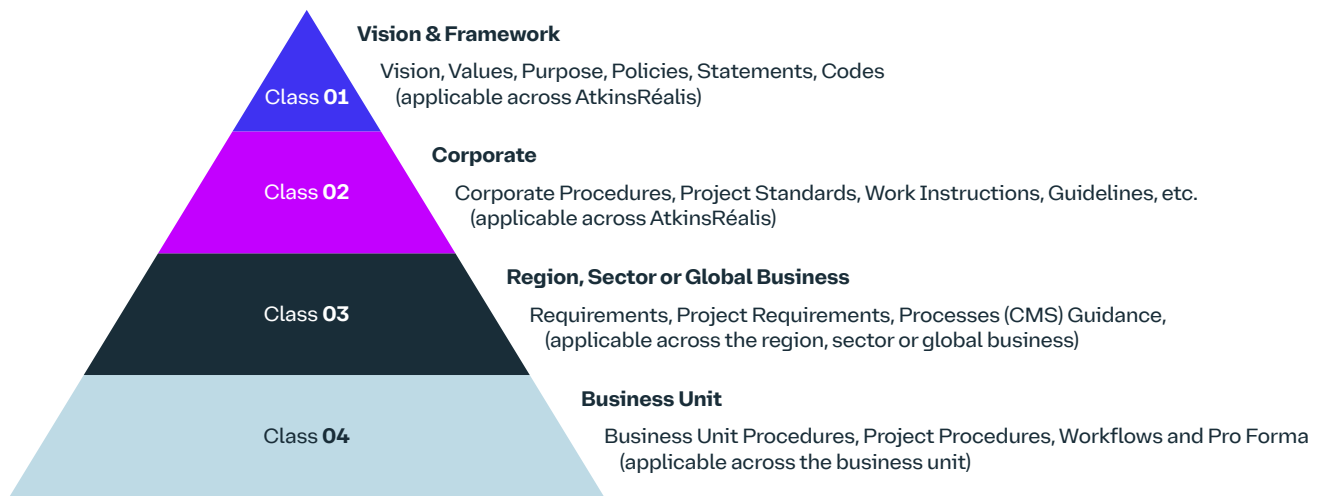 - **AtkinsRéalis** minority interest partnerships

5. BlueBook

The mitigation of HSE **risks** to **personnel**, business partners, the public and Sensitive Areas associated with **AtkinsRéalis** operations is of paramount importance. To address these **risks**, **AtkinsRéalis** has developed its BlueBook which is a GHSEMS, whereby the nuclear **sector**, all **regions**, **global businesses** and associated **Business Units (BUs)** are required to meet or exceed the GHSEMS requirements. The GHSEMS is the foundation for all our HSE management processes.

The **AtkinsRéalis** BlueBook represents the high-level GHSEMS for the global organization and is designed to establish a clear framework of mandatory processes to ensure that the nuclear sector, all **regions**, **global businesses** and associated **BUs** meet the same requirements. The GHSEMS provides a high-level summary of mandatory requirements that can be found in the referenced supporting documents.

AtkinsRéalis expects business partners, such as associate companies or **joint ventures** where we do not have Principal Contractor responsibility, as well as **contractors** and **suppliers** with whom we are involved, to conform to equivalent HSE management requirements. **AtkinsRéalis** will inform business partners of its HSE **governance documents** and work with them where appropriate to support their adoption of practices consistent with our own.

AtkinsRéalis' goal is to continually improve HSE excellence by incorporating strategies and **governance documents** that promote the HSE stewardship of our **personnel**, **contractors**, and the public throughout all our business activities.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

5

The GHSEMS is structured in accordance with the Corporate Governance Framework **Policy**.

Vision & Framework

Class **01**

Vision, Values, Purpose, Policies, Statements, Codes
(applicable across AtkinsRéalis)

Corporate

Class **02**

Corporate Procedures, Project Standards, Work Instructions, Guidelines, etc.
(applicable across AtkinsRéalis)

Region, Sector or Global Business

Class **03**

Requirements, Project Requirements, Processes (CMS) Guidance,
(applicable across the region, sector or global business)

Business Unit

Class **04**

Business Unit Procedures, Project Procedures, Workflows and Pro Forma
(applicable across the business unit)

The *AtkinsRéalis* GHSEMS specifies:

- How the management system elements operate at the global level with the use of *governance documents* which are Class 1 and Class 2 documents supporting consistent operations.

Regions, *global businesses* and the nuclear *sector* must develop:

- Class 3 and 4 documents which align with the minimum requirements of the GHSEMS.
- *Project* / operation HSE management plans which align with the GHSEMS, local regulatory and clients' requirements as applicable.

5.1   Internal and External Issues

All applicable *AtkinsRéalis controlled workplaces* must identify relevant external and internal issues that can affect, either positively or negatively, their HSE performance. The preferred identification method is a high-level Strength-Weakness-Opportunity-Threat (SWOT) Analysis, which considers political, economic, social, technological, legal, and environmental factors.

Internal and External Issues – SWOT Analysis Template

5.2   Needs and Expectations of Interested Parties

All applicable *AtkinsRéalis controlled workplaces* must identify the needs and expectations of relevant internal and external interested parties that have a right to verify or have interest in HSE practices and performances. They must also determine which of these needs and expectations are or could become Compliance Obligations.

Needs and Expectations Register Template

Users must always verify that they use the most current version
available at atkinsrealis.com/internal-governance-library
AtkinsRéalis - Baseline / Référence

6

6. Leadership

Safety is one of our values. Our HSE culture is based on four strategic principles:

1. **Value Alignment:** Encouraging people to take personal responsibility for HSE by setting expectations linked to clear goals for each layer of the business.
2. **Systems and Monitoring:** Putting a robust management system in place to guide safe and successful work while enabling freedom within the framework to enable innovation and adaptation.
3. **Education and Engagement:** Providing HSE leadership training at all levels and facilitating productive environments for engagement and shared learning.
4. **Visible Leadership:** Having a management team who exhibits visible leadership commitment to a safe workplace through direct engagement and participation.

6.1 Value Alignment

Our values put people at the centre of our culture as we understand that by enabling adaptation and innovation, people are the solution to any challenge.

All *employees* must understand and champion these values, whether they lead people or not. However, our leaders are expected to be the ambassadors, lead by example, and uplift their teams.

6.2 System and Monitoring

The GHSEMS has been designed to provide a framework of mandatory core requirements. Critical Risk Control Protocols (CRCPs) and Best Environmental Management Practices (BEMPs) apply as a minimum requirements.

6.3 Education and Engagement

To nurture a generative HSE culture, *AtkinsRéalis* understands that proactive investment in education and routes of engagement is critical to success. This encompasses both the training of people to foster competence and capability and opening routes for collective learning and dialogue to share opportunities and strategies for improvement, as well as continually driving our HSE culture to meet both social and organization needs.

6.4 Visible Leadership

AtkinsRéalis management must conduct frequent HSE *workplace* visits and participate in safety enabling activities to clearly demonstrate their personal commitment to promoting a positive HSE culture and to reinforce appropriate behaviours.

HSE *workplace* visits consist of a formal visit to a *workplace* to observe and discuss HSE related matters. HSE *workplace* visits must be recorded in BlueSky 2.0 and corrective actions assigned when needed.

Safety enabling activities must consist of activities that are not a regular requirement of the leader under their roles and responsibilities outlined in section 6.8.

Examples of safety enabling activities include but are not limited to:

▪ Attendance and completion of the 'Thrive' safety & wellbeing leadership program.
▪ Leading a session or initiative within 'safety week'.
▪ Attendance and completion of any certificated / mandatory HSE or wellbeing training.
▪ Lead a SIF or Level 3 Environment Incident investigation process and present findings to review board.
▪ Develop and present a safety or wellbeing topic relevant to the *BU* / function at a town hall or similar event.
▪ Complete a learning review of a major operational *risk* area with the *BU* / function.
▪ Sponsor and support a wellbeing initiative that is relevant to the *BU* / function.
▪ Review and develop an action plan for one critical *risk* within your *BU* / function.
▪ Lead a workshop which considers the specific impact and influence your function has on frontline safety.
▪ Attend an external event where you are representing *AtkinsRéalis* and delivering on a safety / wellbeing topic.

6.5 Global HSE Policy Statement

The Global HSE Policy Statement is an expression of *AtkinsRéalis*' President and Chief Executive Officer commitment to providing a safe, secure, and healthy *workplace* for all *personnel*, *contractors*, and *clients* throughout all our activities while protecting the environment. It is signed by our President and Chief Executive Officer and updated annually.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

7

6.6 Global Sustainability Policy Statement

AtkinsRéalis Sustainability Policy Statement demonstrates the company's long-term commitment to **sustainable development**. It is based on the United Nations **sustainable development**.

6.7 Global HSE Organizational Structure

Due to the organizational complexity, global jurisdictions, and the diversity of **AtkinsRéalis'** client base and lines of business, the GHSEMS and HSE organization are designed and arranged to ensure alignment and consistency as required, but also to promote adaptability, flexibility, and agility to meet regional and line of business needs. The HSE organization is organized operationally with support provided by a center of excellence HSE team to:

▪ Independently and impartially support to the businesses.

▪ Instil a sense of community and like-minded network of HSE professionals globally.

▪ Leverage and connect the HSE function through communities of practice.

▪ Allow for the growth and development of our HSE talent in the organization.

The HSE organization is organized around four key regional geographies:

▪ Asia, Middle East, Australia (AMEA)

▪ Canada

▪ UK & Ireland

▪ U.S. & Latin America

The HSE organization across **AtkinsRéalis** is a connected community of HSE professionals. HSE **personnel** working in **AtkinsRéalis controlled workplaces** report operationally but maintain a functional relationship to the Global HSE function. **AtkinsRéalis** HSE **employees** working in subsidiaries and minority interest partnerships are connected by informal working arrangements (e.g., dotted line relationships).
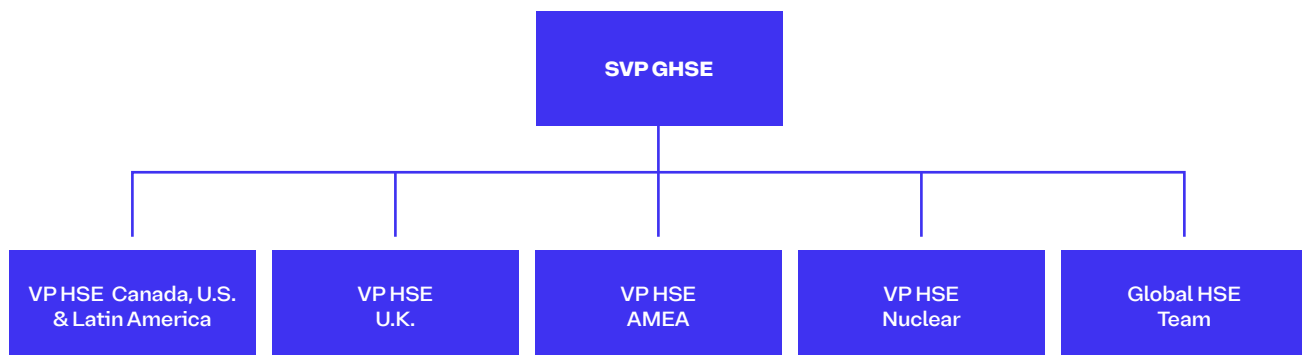
6.8 Roles and Responsibilities

Responsibility for the successful implementation of the GHSEMS on **controlled workplaces** rests with **workplace** line management – executives, **managers**, and supervisors. The same applies to **contractors** assigned to undertake work activities on **controlled workplaces**. Therefore, both **AtkinsRéalis** and its **contractors** have responsibilities and are accountable for the implementation of the GHSEMS activities and HSE operational duties.

Corporately, the HSE approach and targets are communicated from the **Executive Committee (EXCOM)** through to the **sectors**, **regions** and **global businesses** to the **workplace** management.

6.8.1 President and Chief Executive Officer

▪ Takes ultimate accountabilities for all HSE aspects (e.g., Values).

▪ Reviews all SIF and Level 3 Environmental Incidents within 24 hours of occurrence.

▪ Periodically attends the Safety, Project Oversight and Technology (SPOT) committee meeting of the **Board of Directors**.

▪ Communicates lessons learned throughout the organization.

▪ Reviews organizational HSE performance and provides clear direction.

▪ Demonstrates visible HSE leadership.

▪ Reviews, endorses and signs HSE **policy statement** annually.

```
                    ┌──────────────┐
                    │   SVP GHSE   │
                    └──────┬───────┘
   ┌──────────┬──────────┼──────────┬──────────┐
┌──┴───┐  ┌───┴──┐  ┌────┴───┐  ┌───┴───┐  ┌────┴────┐
│VP HSE│  │VP HSE│  │VP HSE  │  │VP HSE │  │Global   │
│Canada,│  │U.K.  │  │AMEA    │  │Nuclear│  │HSE Team │
│U.S. & │  └──────┘  └────────┘  └───────┘  └─────────┘
│Latin  │
│America│
└───────┘
```

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

8

6.8.2 Executive Management (EVP Corporate Functions, Sector, Region or Global Business President, BU Head)

- Gives formal endorsement of the GHSEMS within their entity.
- Reviews organizational HSE performance and provides clear direction for their *function*, *sector*, *region*, *global business*, or *BU*.
- Demonstrates visible ongoing HSE leadership at *workplaces*.
- Escalates communication of all SIF and Level 3 Environmental Incidents within 24 hours of occurrence to the President and Chief Executive Officer.
- Ensures that an action plan is developed and closed-out to address audit findings.

6.8.3 Senior Vice-President GHSE

- Establishes the GHSEMS and all related HSE *governance documents*.
- Reports HSE performance metrics to the *EXCOM*, *sector / region Presidents*, *BU* Heads and to the *SPOT* committee of the *Board of Directors* as official records to demonstrate HSE compliance and continually improve HSE performance.
- Annually evaluates HSE *governance documents*, provides input, and implements change where necessary.
- Designs training materials that are applicable throughout the organization.
- Communicates industry best practices, lessons learned and instructions and develops materials that are applicable throughout the organization.
- Ensures corporate HSE assurance activities are conducted at *workplaces* as required.
- Approves the annual HSE Global Assurance Audit program and reviews schedule.
- Maintains a central HSE database ([BlueSky 2.0](#)) for reporting and storing data associated with leading and lagging indicators.
- Benchmarks leading and lagging indicator targets against competitors and *clients*.
- Establishes HSE communities of practice with similar lines of businesses to ensure transfer of information across similar lines of business.
- Ensures the communities of practice have mechanisms to foster communication, transfer of lessons learned across the *region* and *sector* HSE teams.

6.8.4 Sector or Regional HSE Vice-President

- Ensures all *AtkinsRéalis workplaces* are compliant with current HSE *governance documents*, regulations and laws governing the jurisdiction in which the *workplace* is located.
- Oversees the implementation of the GHSEMS at the *sector*, *region* or *global business* level with the objective of supporting a standardized approach.
- Ensures all *managers* and *personnel* are provided the appropriate HSE training and instructions relevant to their tasks and duties.
- Ensures all internal and external stakeholders are promptly informed of all HSE related issues (e.g., regulations, progress, compliance, violations, etc.) affecting their *sector*, *region* or *global business*.
- Collects information from *BUs* pertaining to *region*, *sector* or *global business* management review.
- Participates in the annual review of the GHSEMS as the region, sector or global business representative.
- Approves final Incident investigation reports for Incidents.
- Evaluates the competencies and capacities required to support associated operations effectively.
- Establishes a HSE structure that provides clarity of roles and responsibilities and fosters clear accountability for the delivery of services and support and leadership of the HSEMS.
- Fosters a matrix reporting organization with *AtkinsRéalis* HSE *personnel* in subsidiaries and in minority partnership arrangements.

6.8.5 Project Manager

- Facilitates *workplace* implementation of the GHSEMS with emphasis on the *risk* management process.
- Conducts regular HSE observations.
- Ensures sufficient HSE resource allocation.
- Ensures training requirements are fulfilled and implemented throughout the *project*.
- Attends HSE meetings and ensures corrective actions are implemented.
- Participates in Incident investigations and ensures implementation of corrective actions following serious HSE Incidents or a fatality.
- Arranges regular *contractor* HSE reviews.
- Ensures the necessary supply, maintenance, operation and availability of safety, medical, firefighting, and environmental equipment.
- Issues disciplinary measures when required and notifies the *contractor* accordingly.
- Reviews and discusses corporate audit findings and Incident investigation reports.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

9

6.8.6   Construction / Operations Manager

- Participates in and adheres to GHSEMS requirements for *workplace* activities.
- Is accountable for ongoing development and implementation of the GHSEMS.
- Ensures that all *contractors* have committed in writing to implement and adhere to the HSE requirements.
- Ensures that every *contractor* or its *subcontractor* completes all measures required for the implementation of the GHSEMS.
- Reviews JHAs, inspections and Incident reports to ensure actions are closed out in the agreed-upon timeframe.
- Ensures that a specific HSE orientation training session addressing the GHSEMS requirements is developed and given to all workers.
- Ensures the coordination of various activities to report and eliminate unsafe behaviours and conditions which could result from the interaction of several *subcontractors*.
- Ensures that *contractors* develop and submit a remedial plan to *AtkinsRéalis* when the number of non-compliances, warnings, Incidents, or hazardous situations increases.
- Attends HSE meetings.
- Receives, analyzes, and verifies the implementation of specifications and plans of temporary works to be approved by a competent person.
- Reviews quality of *contractor* HSE activities and provides meaningful feedback.
- Participates in emergency response activities.
- Is actively involved in HSE audits.

6.8.7   BU HSE Director

- Develops Class 3 and 4 HSE documentation and provides support to *project* management.
- Maintains knowledge of current governing regulations, codes and practices and informs the *project manager* whenever revisions to the *workplace* specific HSE documentation are required.
- Ensures GHSEMS implementation throughout all phases of the *project*.
- Selects internal and external *HSE* dedicated resources in cooperation with *sector* or *region* HSE VP.
- Ensures investigation reports are submitted to GHSE in a timely manner.
- Escalates communication of all SIF and Level 3 Environmental Incidents within 24 hours of occurrence to SVP GHSE.

6.8.8   Workplace HSE Manager

- Implements the GHSEMS throughout all phases of the *project*.
- Establishes system and processes designed to ensure compliance to GHSEMS.
- Approves *contractors* HSE programs.
- Provides documentation and support to *AtkinsRéalis managers* and supervisors.
- Interfaces with *client* representatives to ensure that ongoing input to the HSE processes are incorporated and that satisfaction with the results is achieved.
- Maintains current, daily knowledge of all active areas, records and reports as per HSE requirements.
- Ensures that *contractors* attend HSE training and have competent resources.
- Assists the construction / operations *manager* in follow-up of corrective actions.
- Stops work if necessary and notifies the *contractor* accordingly.
- Leads HSE inspections with *managers*.
- Manages closure of all corrective actions arising from global assurance audit.
- Informs the Joint HSE Committee and *contractors* of any modification or update to the HSE program.
- Conducts Incident investigations and follow-ups on corrective actions.
- Ensures communication with the *contractors* HSE teams.
- Informs construction / operation *manager* of HSE issues to ensure compliance with contractual, legal, and other requirements.
- Participates in Joint HSE Committee meetings.
- Participates in meetings in which HSE topics are discussed.
- Assists Contract Administrators with *contractor* contracts so that appropriate HSE clauses are included.
- Assists Contract Administrators with *contractor* end-of-contract HSE evaluations.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

10

6.8.9   Workplace HSE Personnel

- Supports implementation of the GHSEMS.
- Reviews **contractors**' pre-mobilization forms.
- Supports management in all HSE activities.
- Provides documentation / content for management for HSE awareness / bulletins.
- Facilitates HSE inspections.
- Facilitates / supports Incident investigations.
- Ensures BlueSky 2.0 data is up to date.
- Maintains current, daily knowledge of all active areas.
- Assists with **contractor** on-boarding.
- Supports management in closing out corrective actions.

6.8.10   AtkinsRéalis Employees

Every employee has the following responsibilities:

- Uses appropriate Personal Protective Equipment (PPE) when required.
- Reports any unsafe conditions and near misses to immediate **manager** or supervisor.
- Maintains clean work area.
- Complies with hazard indicators and signs.
- Refuses and / or stops work if unsafe conditions and / or unforeseen **risks** present themselves.
- Refuses to operate equipment without proper training.
- Familiar with our 'Values', 'HSE Policy Statement' and the GHSEMS objectives and requirements.
- Requests explanations from immediate supervisor on measures and / or HSE directives when necessary.
- Participates in training and meetings as required.
- Utilizes the StepBack card where applicable.
- Takes time to understand the Environmental Aspects relevant to their work and managing their Impacts.

6.9   Joint HSE Committee

It is recommended for **AtkinsRéalis** and (where applicable) its **contractor(s)** (with more than 20 employees) to form a Joint HSE Committee (JHSEC). It may also be required by legislation when the total workforce equals a specific number. Refer to local legislation for specific guidance on membership requirements and committee responsibilities. There should always be balanced representation between management and workers on the committee. This ensures that workers are engaged, consulted and their inputs are addressed in the decision-making process.

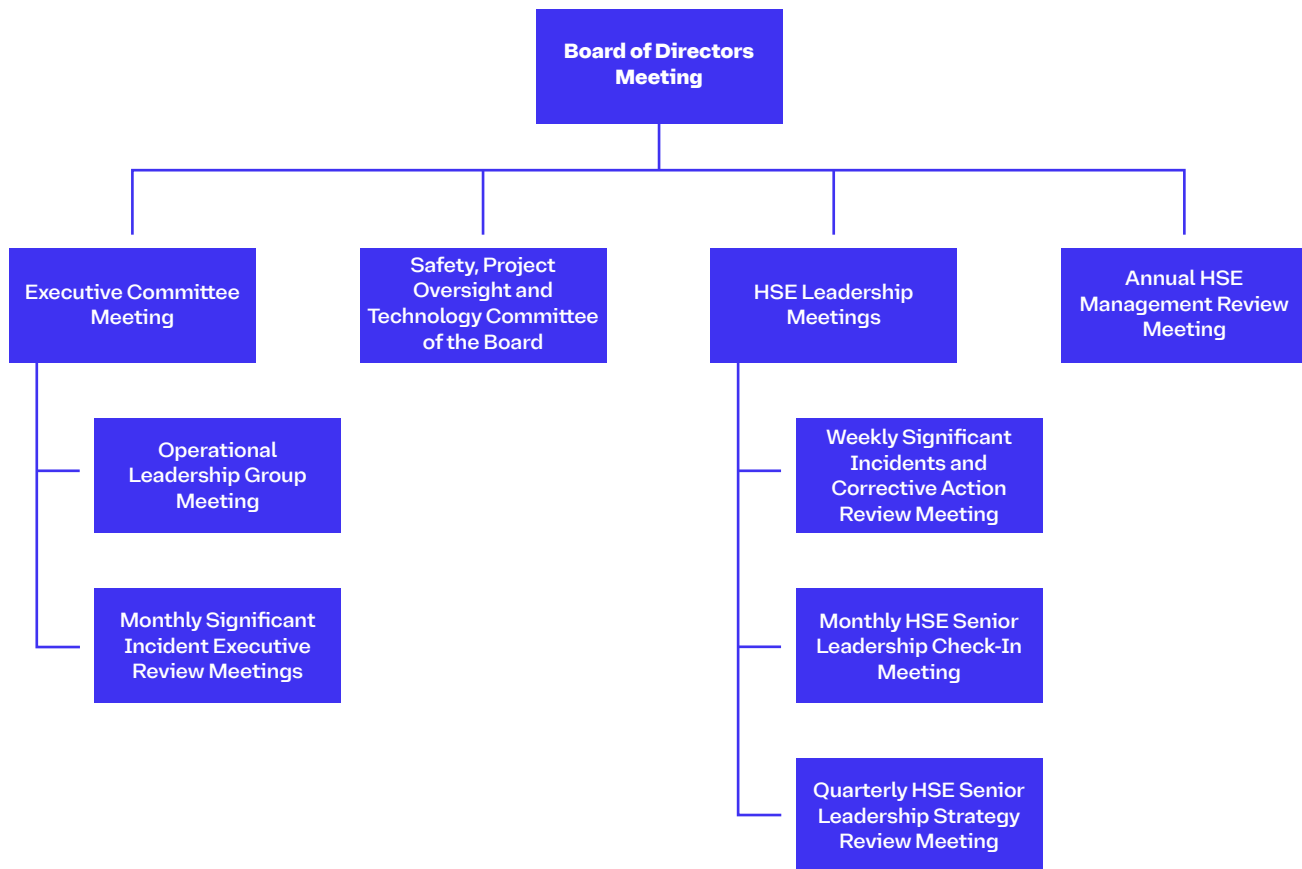As a minimum, the functions of the JHSEC will be as follows:

- To review significant Incidents and / or Incident trends and develop and recommend appropriate controls and interventions.
- Review monthly summary of key learnings from recent Incidents and ensure these learnings are communicated and implement as required at their **workplaces**.
- Review progress towards achieving proactive performance indicators and conducting worker engagement initiatives.
- Review and improve where required the levels of communication and participation in HSE programs by all **personnel**.
- Review and analyze future proposed work activities to determine potential areas of **risk** and recommend suitable corrective actions / interventions.
- Review **workplaces** health and hygiene requirements and standards and recommend appropriate controls where necessary.
- Review and analyze sources of pollution and waste and identify appropriate efforts to eliminate or reduce them.
- Analyze effectiveness of reporting and recording systems and make recommendations for improvement where required.
- Review effectiveness of training, education and orientation programs and recommend appropriate actions for improvement.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

11

6.10 Oversight

AtkinsRéalis implements HSE programs across the corporation globally to:

- Monitor company-wide performance, ***risks***, threats, and opportunities across the enterprise and ensure these are appropriately characterized, considered, and managed.
- Align objectives and initiatives to leverage best practices, efforts, and resources.
- Ensure learning is communicated and transferred across the enterprise based on lessons from the various ***sectors***, ***regions*** or ***global businesses***.

The following chart shows the assurance activities stewardship that exist at the global HSE level to provide oversight and management of HSE ***risks*** and objectives.

```
                        ┌─────────────────────┐
                        │ Board of Directors  │
                        │      Meeting        │
                        └─────────────────────┘
```

Board of Directors Meeting

- **Executive Committee Meeting**
  - Operational Leadership Group Meeting
  - Monthly Significant Incident Executive Review Meetings
- **Safety, Project Oversight and Technology Committee of the Board**
- **HSE Leadership Meetings**
  - Weekly Significant Incidents and Corrective Action Review Meeting
  - Monthly HSE Senior Leadership Check-In Meeting
  - Quarterly HSE Senior Leadership Strategy Review Meeting
- **Annual HSE Management Review Meeting**

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

12

7.   Thrive Wellbeing Framework

AtkinsRéalis global wellbeing framework is an approach to create an environment where employees can thrive, flourish and achieve their full potential.

Aligned with ***AtkinsRéalis***' core value of Safety, our global framework is supported by regional delivery.

The foundation of our wellbeing framework is to promote and embed a holistic approach through 5 interrelated (intertwined) but unique pillars. Our organizational strategy aims to be inclusive and far-reaching as to cover the various stage of the health continuum: from promotion, prevention, early intervention, intervention to recovery.

Accountability for ***employees***' wellbeing lies with the organization, with leader and teams, and with each individual ***employee***.

7.1   Five Pillars of AtkinsRéalis Wellbeing Approach

Each ***employee*** has a different approach to their wellbeing, and different needs and priorities. They all are on their unique health continuum which can fluctuate throughout time.

Workplace Wellbeing: This is where our organizational culture resides, is rooted and takes accountability.

Emotional Wellbeing: Emotional Wellbeing is the ability to navigate both positive and negative emotions, thoughts and feelings experienced throughout one's life. This pillar is about having the skills to cope and manage effectively through challenges and changes.

Social Wellbeing & Community: Social Wellbeing is the ability to communicate and interact positively with others and to build meaningful and healthy relationships. This pillar helps increase the sense of purpose, belonging and inclusion.

Financial Wellbeing: Financial wellbeing is the extent to which you can comfortably meet your current financial commitments and needs while also having the financial resilience to continue doing so in the future.

Physical Wellbeing: Physical wellbeing is to lead life with healthy lifestyle behaviors and habits, free from or resilient to illness and disease. This pillar helps support overall wellbeing and helps feel at best as well as looking after long-term health.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

13

8. Planning

8.1 Risk Management

AtkinsRéalis undertakes comprehensive ***risk management*** to ensure hazards are identified and controlled.

At a minimum:

- ***Workplaces*** containing hazards must be assessed.
- Neighbouring facilities / operations must be considered.
- The corporate (or equivalent) ***risk*** assessment tools must be utilized, and associated documentation must be retained.
- ***Risk*** assessments must be performed regularly and in a timely manner by qualified ***personnel*** and with sufficient management representation.
- ***Risk*** assessments must be reviewed whenever changes occur to the scope of work, equipment or materials used, or in the organization of the work team. At a minimum, ***risk*** assessments must be conducted at the following stages:
   - early stages of new ***projects*** and studies;
   - detailed design of current ***projects***;
   - critical decision points in current ***projects***;
   - both routine and non-routine operations;
   - following modifications;
   - supplier ***workplace*** inspections; and
   - travel.
- ***Risk*** assessments must be reviewed at specified intervals with management involvement.
- Control measures must be implemented to ensure that ***risk*** is As Low As Reasonably Practicable (ALARP).
- A follow-up of the ***risk*** assessment control measures must be performed to ensure corrective measures are effective and sustainable.

8.1.1 Health and Safety Risk Register

It is expected that all ***projects*** / operations must have an active ***risk register*** in place to catalogue health and safety ***risks*** and their controls. The ***risk register*** must be reviewed at intervals proportionate to the level of ***risk*** and be updated more frequently based on audit and inspection findings, corrective actions from Incident investigations and pre-mitigated ***risk*** levels.

The ***risk register*** must:

- be developed and updated for all ***projects*** / operations.
- be managed by the associated HSE team.
- be compiled by multi-disciplinary teams.
- have pre-and post-mitigation ***risk*** calculations.
- identify ***risk*** owners and define action items with specific timeframes.
- be accessible by all stakeholders.

Project Risk Management ***standard***

HSE Criteria for Project Risk Register ***work instruction***

8.1.2 Environmental Aspects and Impacts Register

An active Environmental Aspects and Impacts register must be established to determine the Significant Environmental Aspects (SEA) and their mitigation measures. ***Workplaces*** must implement and maintain this register in consultation with relevant activity team members. Criteria used to determine the SEA must be documented.

The Environmental Aspects and Impacts register must be reviewed whenever there are changes in the activities so that the SEAs are always reflected. The Environmental Aspects and Impacts register must at a minimum contain the following information:

- Environmental Aspects associated with upstream, on-site, and downstream activities over which ***AtkinsRéalis*** exercises control or influence.
- Environmental Impacts resulting from the Aspects.
- Assessment of the SEAs.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

14

- Reference to control measures in line with the Best Environmental Management Practices (BEMPs) ***guidelines*** covering the following aspects:

  - Atmospheric emissions
  - Energy
  - Noise and vibrations
  - Water and wastewater
  - Erosion and sedimentation
  - Hazardous materials
  - Vehicles and refueling
  - Waste
  - Contaminated soils
  - Fauna and flora, and
  - Cultural heritage

The best practices presented in the BEMPs ***guidelines*** must be treated as minimum environmental requirements and must be fully implemented at all ***AtkinsRéalis controlled workplaces***.

Environmental Aspects Impacts Identification ***work instruction***

Environmental Aspects and Impacts Register template

Best Environmental Management Practices (BEMPs) ***guidelines***

8.1.3   Critical Risk Control Protocols

All ***personnel*** must comply with the Critical Risk Control Protocols (CRCP) ***guidelines***. These non-negotiable practices are designed to mitigate or eliminate high ***risk*** hazards areas that have historically resulted in fatalities and significant events. The CRCPs establish minimum performance expectations and must be fully implemented at all ***AtkinsRéalis controlled workplaces***.

The critical ***risk*** areas are:

1. Vehicles
2. Hazardous Materials
3. Equipment Safeguarding
4. De-Energization
5. Working at Heights
6. Lifting Operations
7. Confined Space
8. Excavations, and
9. Temporary Works

Critical Risk Control Protocols ***guidelines***

8.1.4   Job Hazard Analysis

The job hazard analysis (JHA) is a documented analysis used for evaluating and documenting a specific job or group of similar activities to identify the job steps, associated hazards, ***risk*** levels, responsibility, and appropriate controls required to complete the work safely. A JHA must be completed when work activities are recognized as being high ***risk***, identified by the ***project risk register*** as requiring further detailed evaluation, if the ***project*** utilizes new technologies or methodologies, or if there is an Incident history.

The JHA process must include:

- description of job steps
- potential hazards
- pre-controls ***risk*** rating, and
- post-controls ***risk*** rating

Job Hazard Analysis ***work instruction***

Job Hazard Analysis worksheet

8.1.5   Safe Work Permit

The safe work permit ensures that ***workplace*** hazards have been properly addressed and that the necessary controls to mitigate those hazards and reduce the ***risks*** have been implemented prior to the start of work. Safe work permits must be used for excavations, hot work, access to confined spaces and electrical work.

Safe Work Permit ***work instruction***

Safe Work Permit ***form***

8.1.6   StepBack

The ***AtkinsRéalis*** StepBack process is a field-level hazard assessment tool used to identify hazards and the appropriate controls in a consistent and systematic manner.

Work teams or individuals must participate in the StepBack process at the start of each day, new task and / or when the scope of work or hazard conditions have changed and prior to commencing any task or activity. StepBack is a documented discussion of the HSE hazards, associated controls and subsequent ***risk*** levels associated with the planned work for that shift / day.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

15

The activities of every team member, as well as the activities of anyone else within the same area, must be identified, documented, and adequately controlled with a record retained.

All *projects* / operations must use StepBack and record their assessments on the StepBack card. Completed StepBack cards are submitted to the *workplace* management / HSE team.

StepBack *work instruction*

StepBack Card

8.1.7   Hazard Elimination and Control

The hierarchy of controls is the preferred order to mitigate hazards and control *risk* levels:

1. **Elimination:** Complete removal of a hazard.
2. **Substitution:** Replacing the material or process with a less hazardous one.
3. **Engineering:** Designs or modifications to reduce the exposure to the hazard.
4. **Administrative:** Limit exposure to hazardous conditions or energies by procedural means (e.g., timing of work, policies, signage, and work practices).
5. **Personal Protective Equipment (PPE):** Last line of defense: hazards are still present, and PPE is used to reduce the potential for harm.

A number of these options may be considered and applied individually or in combination to ensure that exposure to hazards is ALARP. If a hazard cannot be eliminated or mitigated effectively, work must stop, and protective measures put in place to provide a safe working environment.

8.2   Determination of Legal and Other Compliance Obligations

All *workplaces* must be able to demonstrate knowledge of and compliance with all applicable Occupational Health, Safety (OH&S) and Environmental legislation and other requirements in their respective jurisdictions.

Each *workplace* must ensure that a process is in use to determine and provide access to all sources of up to date legal and other Compliance Obligations applicable to their location, hazards, *risks*, Environmental Aspects and GHSEMS.

A register of HSE legal and other Compliance Obligations must be established, documented, and maintained with ongoing reviews for amendments, additions, and other changes. This information must be communicated to all interested parties. Periodic compliance evaluations are mandatory, these requirements are defined under the HSE Performance Evaluation section of this document.

HSE Legal and Other Compliance Obligations Register template

8.3   Objectives

HSE is an integral part of the corporate strategic planning process. GHSE establishes, implements, and maintains annual HSE objectives to ensure consistency with the Global HSE Policy Statement commitments. HSE objectives ensure commitment to continuous improvement of HSE performance, as well as the effectiveness of the GHSEMS. These annual objectives are proposed by GHSE to the *EXCOM* for review and approval.

These objectives consider HSE hazards, SEAs, elevated *risk* levels, technology, financial, legal, operational, and business requirements. Progress towards achieving established objectives and targets is monitored by GHSE and reported to the *EXCOM*, Operational Leadership Group (OLG), EVPs and *sector* or *region* HSE VPs / Directors monthly.

8.4   Key Performance Indicators

8.4.1   HSE Performance Scorecard

An HSE performance scorecard is used to measure Key Performance Indicators (KPIs) at a *workplace*, *BU*, *sector*, *region*, *global business* and global level. Performance is measured monthly with weighted leading and lagging components to provide a single summary score against an annual target. The elements measured in the scorecard are updated annually to align with the organization's HSE goals and to address specific improvement areas. KPI's are developed to drive key proactive behaviors and activities that reduce the potential for Incidents or injuries and that are based on industry best practice.

8.4.2   Environmental Indicators

Environmental performance indicators measurements are a component of the corporate HSE performance scorecard.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

16

9. Support

9.1 Competence, Training and Awareness

Supervisors and ***managers*** must ensure that ***employees*** are competent to undertake their work. Based on individuals specific training needs, training may be conducted through various formats including online, through the corporate Learning Management System (LMS), internally and externally. A training matrix will be used to document all training conducted by an ***employee***.

A training matrix must be developed and maintained by the ***workplace*** to determine who has been trained, when they were trained, what training gaps exist, as well as to schedule training, and allocate appropriate resources.

Each ***workplace*** must ensure the training matrix identifies:

- ***employee*** name
- job role / function
- job specific training requirements, and
- completed training, including where and when

9.1.1 Thrive Leadership Program/Course

AtkinsRéalis' aspiration is to create environments in which every ***employee*** actively lives their personal commitment to health, safety, and wellbeing. We recognize that our Leaders have a pivotal role in making this a reality. We appreciate the intrinsic link between health, safety and wellbeing and the impact it has on every dimension of our business performance, and we understand that wellbeing is an enabler of safety.

The intent of the Thrive leadership program is to support ***AtkinsRéalis*** leaders to create environments in which people thrive and deliver safe work in a complex world.

We're shifting our culture from constraint and compliance to care and collaboration.

The intended outcomes for the Thrive Leadership program focus on four areas:

1. **Worldview:** See yourself as a health, safety, and wellbeing leader.

2. **Decision-making:** Increase your ability to make choices that safeguard our people, whatever the circumstances.

3. **Attention:** Shift from fixing issues to creating environments that allow people to thrive

4. **Tools:** Develop ways of working that enable effective conversations about health, safety, and wellbeing

9.2 Communication

AtkinsRéalis encourages all ***personnel*** and ***managers*** to engage in discussions and dialogue that promote recognition and understanding of HSE hazards and ***risk*** levels. Information related to HSE issues must be communicated to all appropriate groups and ***personnel*** in a prompt and effective manner.

Sector, ***regions***, ***global businesses*** and ***BUs*** must implement and maintain a process required for internal and external communications relevant to their ***BU*** HSE management system.

9.3 Documented Information Control

The ***workplace*** HSE programs must be maintained in compliance with ***AtkinsRéalis*** Records Retention Schedule ***work instruction*** and the applicable local legislation.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

17

10. Operation

10.1 Management of Change

Management of change is the process of ensuring strict control and communication of planned temporary or permanent changes to *project* specifications, HSE *governance documents*, controlled design documents, materials, equipment, execution plans, or commercial contracts to minimize the introduction of new HSE hazards into the work environment.

As a minimum, the following elements will be addressed:

- Control change consistently with regulatory requirements.
- Ensure that all aspects of change are properly registered, documented, tracked, and communicated to the *project* team in a concise and controlled manner.
- Ensure a change is not proposed or implemented unless there is a basis around improving safety, operability, maintainability, legal, or environmental / regulatory / community and to document the same.
- Assign appropriate levels of approval for changes.

A HSE *risk* assessment must be performed and documented prior to implementing any change to ensure that it does not introduce *risks* to people, environment, property, and surroundings. This exercise must take into consideration both planned and unplanned changes, as well as sudden or gradual changes.

All areas of potential change must be considered including:

- equipment, processes and layout
- operation and maintenance *procedures*
- design, construction, repair, and maintenance
- materials used and inherent properties
- organizational structure and responsibilities
- *personnel* training or competency requirements
- *personnel* changes, and
- Compliance Obligations.

10.2 Supply Chain Management

AtkinsRéalis must have robust supply and procurement processes in place to ensure that goods, services and *contractors* are fulfilling their respective HSE responsibilities. These supply and procurement processes must establish performance-based criteria to manage *risk*.

HSE procurement requirements must be scalable, fit-for-purpose and commensurate with the contract value, delivery model, complexity, and *risk* exposure. The requirements must be applied to a level of detail sufficient to effectively manage the *risk*, scope, and complexity of the *project*. *Sector*, *regions* and *global businesses* must identify further and more detailed requirements which reflect the type of work being delivered and build on the requirements as appropriate.

10.2.1 Procurement

Procurement must:

- Ensure programs are implemented within the procurement and supply chain systems to meet HSE requirements.
- Ensure HSE requirements are clearly articulated in any contracts issued to *contractors*.
- Initiate (where appropriate) at the direction of the Contract Owner corrective or consequential measures with the *supplier*, provider, and / or *contractor* where HSE requirements are not being met or are unsatisfactory.
- Ensure inclusion of routine inspection and monitoring programs to verify the desired performance of the *contractor* must be established considering their individual *risk* factors.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

18

10.2.2   Goods and Services

Where goods or services are to be supplied to a physical *AtkinsRéalis workplace*, those goods and services must:

- Be procured through an approved procurement process in the applicable *sector* / *region* / *global business* and *BU*.

- Include relevant HSE requirements with the order / contract.

- Meet applicable HSE requirements, codes, and certifications in the jurisdiction where they will be used.

- Be quarantined and not released for use, until the HSE requirements have been validated and any necessary documentation has been verified and presented with the material.

- Have a Safety Data Sheet (for any material to which the Globally Harmonized System applies) available to persons on the premises and the material must have all necessary labels and markings of the Globally Harmonized System before the material is released for use.

10.2.3   Contractors

Due to the broad scope of activities, numerous variables exist which may affect the way contractors are evaluated and managed.

These variables include but are not limited to:

- the level of *risk* involved
- *contractors* managing *subcontractors*
- *contractors* having primary responsibility for an assigned *project* area, and
- the maturity level of *contractors* available

There are four classification levels of *risk* identified for *contractors*. The higher the *risk* level, the greater the degree of HSE evaluation and performance criteria. *Contractors* must be classified into the level, which represents the highest level of *risk* based on the activities that the Contractor will be performing.

Contractors performing work at a *AtkinsRéalis workplace* must be evaluated and "pre-qualified" to meet HSE requirements to work with *AtkinsRéalis*. This pre-qualification program must ensure that contractors demonstrate they meet the requirements as stipulated in the Contractor Pre-Selection Form whether those requirements are evaluated manually or through some other means (e.g., digital, third party, etc.).

Contractor Management *procedure*

Contractor Pre-Selection *form*

Contractor Pre-Mobilization *form*

10.3   Operational Control

The following *procedures* must be implemented across the entire organization:

Fit-for-Duty

HSE in Our Office

Traffic Control

Working Alone

10.4   Emergency Preparedness and Response

10.4.1   Business Resilience and Recovery Program

To be a resilient organization, all *AtkinsRéalis* corporate, regional and local (countries, *projects*, and *workplaces*) operations need to plan and prepare for, respond to, and recover from any major or catastrophic Incident that could disrupt normal business activities and impact our people, assets, and reputation.

The Business Resilience and Recovery Program (BRRP) will provide the framework to ensure *AtkinsRéalis* has the appropriate resources and Incident response plans to recover from major or catastrophic Incidents.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

19

The BRRP requires that a Crisis Management Team (CMT) be established at two levels of the organization:

- Corporate level – including *sectors*, *regions*, *global businesses* and corporate functions.
- Regional level – including countries, *BUs*, functions, *workplaces*, which includes house leaders.

All corporate, regional, and local operations must implement the BRRP, and the head of the *BUs* / entities / *workplace* have the responsibility to implement within their respective *sector*, *regions*, or *global businesses*.

The BRRP implementation and maintenance requirements include the following twelve (12) steps:

1. Appoint CMT members.
2. Conduct *risk* assessment and Business Impact Analysis.
3. Design, implement and maintain the Business Resilience Management Plan.
4. Design, implement and maintain the Emergency Response Plan (**ERP**).
5. Design, implement and maintain the Business Continuity Plan.
6. Transmit critical applications and processes data to the Information Technology group for their IT Disaster Recovery Plan.
7. Establish Business Resilience Centre.
8. Establish internal and external contacts.
9. Establish / align Incident notification, reporting, recording and communication (Incident notification process).
10. Provide training and awareness.
11. Test / validate the BRRP.
12. Review and maintain the BRRP.

[Business Resilience and Recovery *procedure*](#)

10.4.2   Emergency Response Plan

In the event of an emergency or security threat, all *workplaces* must be adequately prepared to react in an efficient and effective manner to protect the people, community, environment, client's assets, and company's assets. All *workplaces* must have a comprehensive and current Emergency Response Plan (ERP).

At a minimum, it must include:

- Emergency response role assignments.
- Periodic emergency response training in accordance with applicable requirements.
- Periodic drills / simulations testing evacuation and response.
- An adequate number of trained emergency wardens and first aiders at the *workplace* during all working hours.
- Appropriate first aid and other emergency response equipment at the workplace, in good working order and regularly inspected, maintained, and replaced, as necessary.
- Incident investigations done in a timely manner and effectively communicated to all affected parties, including management, the local HSE department and regulatory and law enforcement bodies, as appropriate.
- Preventative inspections to proactively identify hazards and their controls, and
- A review of the ERP on an annual basis or when an amendment has taken place.

[Emergency Response Plan template](#)

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

20

11. Performance Evaluation

11.1 Performance Measurement and Monitoring

The **AtkinsRéalis** HSE indicators are meant to define which work-related events are tracked to promote a HSE culture (leading indicators) and report work-related HSE Incidents (lagging indicators). The objective is to collect HSE statistics using common metrics for all **sector**, **regions** or **global businesses** so that the numbers can be readily trended, tracked and compared.

AtkinsRéalis utilizes an on-line system called BlueSky 2.0 powered by Enablon. All **AtkinsRéalis personnel** with a company login have access to BlueSky 2.0.

BlueSky 2.0 is administered by Corporate GHSE and monitored by **sector**, **region** and **global business** level HSE professionals for accuracy and completeness. A variety of activities are tracked in BlueSky 2.0 including **employee** observations, **manager** site visits and enabling activities, inspections, audits, Incident reporting, and investigations. Corrective actions are also tracked in the system to closure.

Entered events are vetted by the **workplace** HSE team and distributed within the organization accordingly. All hours worked must be entered monthly into BlueSky 2.0 by the **sector**, **region**, **global business** or **workplace** HSE Team within the first ten days of the following month. The results from the **BU** HSE reporting are wrapped up in a corporate GHSE level report that regularly identifies status of HSE Objectives and KPI targets at a **sector**, **region** and **global business** level.

HSE Indicators guidelines

11.1.1 Environmental Monitoring Program

Workplaces subjected to environmental monitoring requirements must develop an environmental monitoring program to ensure they fulfill their obligations.

An environmental monitoring program must include, at a minimum:

- Parameters to be monitored
- Sampling or measurement location
- Sampling or measurement frequency
- Whom to report to
- Reporting frequency
- Requirements / criteria to comply with, and
- Reference documents.

Evidence of the results of monitoring, measurement, analysis must be readily available and retained.

11.1.2 Instrument Calibration

Workplaces must develop a process to ensure all monitoring and measuring equipment owned or leased by **AtkinsRéalis** or **contractors** are functional and verified / calibrated and maintained as per their manufacturer's recommendations.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

21

11.2 Surveillance and Global Assurance Audit Program

AtkinsRéalis' surveillance and global assurance audit contribute to the company's objective for continual improvement in HSE performance by evaluating compliance with HSE requirements. Inspections and global assurance audit are a critical component in receiving feedback, understanding, and supporting the business, driving positive change, and future planning. Internal inspections, Global assurance audits, compliance evaluations and registrar audits are performed to monitor compliance with the GHSEMS, Legal and other Compliance Obligations, and to receive feedback from *employees* and *managers*.

Surveillance activities are conducted at various frequencies and levels within the organization.

11.2.1 Workplace Inspection Program

Every *workplace* must implement a documented inspection program, stating different inspection levels and frequency with responsible job functions. Inspections must be recorded within BlueSky 2.0 Inspection module and corrective actions must be issued for each inspection finding.

At a minimum, *workplace* inspections (including offices) will be performed quarterly and may be performed more frequently as required by the *workplace* HSE plan, client request, local regulations and / or *BU* requirements.

11.2.2 Global Assurance Audit

HSE global assurance audits are spilt into two levels with *employees*, *managers* and support functions engaged in the audit program at each level:

1. Corporate level
2. Operational level

All corrective actions identified during a global assurance audit must be entered and tracked to closure in BlueSky 2.0.

11.2.2.1 Global Assurance Audit – Corporate Level

Corporate HSE global assurance audit of selected *workplaces* must be conducted annually. The corporate global assurance audit tool must be used as it is designed to validate compliance with *AtkinsRéalis* requirements as well define *risk* exposure and *projects risk* profile. Corporate global assurance audit are conducted by the Global HSE team.

A global assurance audit schedule is established by the SVP GHSE at the beginning of the year in consultation with business leaders. Frequent updates during the year are made to the global assurance audit schedule to reflect changes in the scope of activities (e.g., new *projects* / operations) and timelines.

The audit selection criteria include, but are not limited to:

- *Workplace* management reviews
- Review of monthly HSE reports
- Closure of open corrective actions
- Incident trends including leading and lagging indicators
- Audit result analysis, and
- Specific *client* requests

Upon completion of the global assurance audit, the report is sent by the lead auditor to:

- *Project* or *workplace manager*
- *HSE manager* / lead
- Global HSE SVP; and
- *Region* or *sector* HSE VP.

Following the issuance of the report, *workplaces* are required to submit an action plan in BlueSky 2.0 within 14 days of the review date to address all findings that were identified. All the resulting corrective actions must be implemented to close the nonconformities as per the action plan. An update on the corrective actions status to close the findings must be submitted to the GHSE lead reviewer within 90 days of the audit date.

Audits of *non-controlled workplaces* may also be conducted using the corporate global assurance audit tool or as otherwise directed the SVP GHSE.

HSE Global Assurance Audit procedure

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

22

11.2.2.2 Assurance Audit – Operational Level

Every *workplace* must implement a documented internal surveillance program. As a part of this program, an internal surveillance review must be conducted at least annually using the corporate global assurance audit tool. Corrective action plans must be issued for each audit's findings. *Sector* or *region* HSE VPs or assignees are requested to participate in the self-directed assurance audit (internal audits) of the selected *BU workplaces*. Active participation will be mandatory from all *workplace personnel* including site management representatives.

Auditor training must be conducted, and competency evaluated. The terms of reference for internal auditors are to:

- Identify areas of non-compliance and agree on corrective action with the responsible *employees* and *managers*
- Identify opportunities for continual improvement
- Identify opportunities for improvement in business efficiency
- Provide input for management reviews
- Raise awareness of the GHSEMS
- Identify trends as a baseline for improvement

11.2.2.3 HSE Compliance Evaluation

Each *workplace* must ensure that a process is in use for evaluating their compliance with legal and other Compliance Obligations (see 8.2). *Workplaces* must perform HSE compliance evaluations on a periodic basis at a frequency determined by the *workplace* based on considerations such as size, changes in HSE and other obligations, history, and past performance.

Without exception, at least one compliance evaluation must be conducted per year and if a *nonconformity* is detected during the evaluation, action should be taken as per the requirements of the *nonconformity* to ensure thorough and proper correction to prevent recurrence. Compliance evaluations must be conducted by *personnel* knowledgeable of the local HSE legislation. Compliance Evaluation report and corrective action tracking must be managed in BlueSky 2.0.

11.2.2.4 Certification Bodies Audits

Surveillance and recertification audits are carried out periodically by external certification bodies to ensure our GHSEMS meets the ISO 14 001 and ISO 45 001 standards' requirements while adopting a continual improvement mindset. Any identified findings (nonconformities) must be managed in BlueSky 2.0 and addressed in a timely manner.

11.3 Management Review

Management HSE program reviews must be conducted at the Corporate, *BU* and *projects* / operations levels at a minimum annually. Management reviews must be undertaken to confirm adequacy of the GHSEMS and continuing suitability, adequacy, and effectiveness, and to identify any need for changes to the processes, *governance documents* and objectives.

Records of the management reviews will be retained. HSE Management System reviews will include:

- Summary of results of internal audits and inspections
- Evaluations of compliance with applicable legal requirements and other requirements
- Relevant communication(s) from external interested parties, including Complaints
- HSE performance of the organization
- Extent to which objectives have been met
- Progress from any focus groups
- Status of Incident investigations
- Review of Significant Environmental Aspects and Impacts
- Follow-up actions from previous management reviews
- Status of corrective actions
- Changing circumstances, including developments in legal and other HSE requirements
- Results of *employee* surveys
- Adequacy of resource for maintaining an effective HSE management system, and
- Recommendations for improvement.

The outputs from management reviews will be consistent with the organization's commitment to continual improvement and will include any decisions and actions related to possible changes to HSE *governance documents* and objectives, goals, and / or resources.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

23

12. Improvement

12.1 Incident Management

The investigation is our curiosity to understand unplanned outcomes as difference between work as planned versus work as done. Investigations need to be conducted immediately after an event to determine what happened and ensure it is not repeated.

To properly manage Incident learnings:

- All Incidents must be entered into BlueSky 2.0 within 24 hours of occurrence.
- Where an Incident classification is not immediately clear, documentation must be uploaded to BlueSky 2.0 describing the reasons for the chosen classification.
- All Incidents are to be reported and investigated utilizing the HSE Incident Management *procedure*. For SIF and Level 3 Environmental Incidents, root cause(s) must be established as detailed in the HSE Incident Management procedure.
- The final investigation reports must be uploaded within 14 days when the investigation is internally led.
- All corrective actions must be tracked in BlueSky 2.0. Corrective actions where the initial *risk* level is high or extreme must be prioritized and closed in a timely manner.
- All SIF and Level 3 Environmental Incidents must be reported to the President and Chief Executive Officer within 24 hours of occurrence.
  - Upon Incident occurrence on *controlled* or *non-controlled projects*, *project* line management must notify the *BU* Head and the *BU* HSE representative. The *BU* Head must immediately inform via email the President and Chief Executive Officer, *sector*, *region* or *Global Business* President, Regional HSE VP / Director, Chief Risk Officer (CRO), and SVP GHSE.

HSE Incident Management *procedure*

12.1.1 Business Unit Conference Call

For all SIF and Level 3 Environmental Incidents, a *BU* specific conference call must be held within 96 hours with the *BU* head and respective business leaders to discuss the condition of those impacted or environmental damage. A record of this call must be uploaded into the evidence section of the associated event entry in BlueSky 2.0. A *GHSE* representative must be invited to participate in the call. Following the call, the *BU* HSE representative will send an Incident flash report to the *sector* or *region* HSE *VP* for their review and distribution with the Incident review committee.

Incident Flash Report Template

12.1.2 Incident Review Committee

The Incident review committee (comprised of SVP GHSE, *sector* or *regions* HSE VP and members of the GHSE team) meets on a weekly basis to review all SIF and Level 3 Environmental Incidents, related corrective actions. When the classification or potential of an Incident is questioned, the SVP GHSE must make the final determination.

This committee further reviews the Incident investigation, notification details and corrective action closure rates. The following indicators are used to determine if effective learning opportunities are being captured through Incident management. The six metrics are:

1. Incident reported in BlueSky 2.0 and notification to the President and Chief Executive Officer of SIF and Level 3 Environmental Incidents within 24 hours.
2. A *BU* conference call held for all SIF and Level 3 Environmental Incidents within 96 hours of event occurring or event escalation to a SIF and Level 3 Environmental.
3. An Incident flash report for all SIF and Level 3 Environmental Incidents submitted to the Incident Review Committee following the 96-hour call for their review and distribution.
4. Incident investigation completed for all SIF and Level 3 Environmental Incidents and uploaded once approved, within 14 days for internally led investigations.
5. A one-page Lessons Learned sent to the Incident review committee within 21 days for all SIF and Level 3 Environmental incidents for their review and distribution.
6. Corrective Actions closed on or before the original due date set in final investigation report for all SIF and Level 3 Environmental Incidents in BlueSky 2.0.

A monthly learning call will be held to review selected Incidents chosen by SVP GHSE with the President and Chief Executive Officer and *CRO*. Leaders of the *region*, *sector*, *global business*, *BU* and *projects* / operations of the selected Incidents will participate in the call to review the investigation learnings. Following this learning call, a Safety Value Moment will be shared by the SVP GHSE to the OLG for their senior leadership meetings.

Lesson Learned Template

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

24

12.1.3   HSE Observations

An HSE Observation is any unsafe condition or unsafe behaviour (no energy release) where no Incident occurred, but the possibility existed. These occurrences are to be promptly reported into BlueSky 2.0. Open HSE observations must be tracked to closure with highest priority given to correcting conditions that could lead to an injury or illness.

12.2   Nonconformity and Corrective Actions

When a *nonconformity* occurs, all *personnel* have a responsibility and organizational freedom to identify apparent nonconformities to specified requirements and any phase of a *project* or in any processes used within the organization. The need for corrective action to eliminate the root cause(s) of the *nonconformity* must be managed to ensure that the nonconformity does no recur or occur elsewhere.

12.3   Continual Improvement

The requirements of this document must be routinely monitored and evaluated to ensure that the GHSEMS is adequately being implemented to mitigate *risk*, and to provide support and service to the company.

Such routine monitoring and evaluation must be conducted through methods such as:

- Surveys of the workforce
- Learning teams
- Peer evaluations
- Formal global system audits
- Annual self-audits

12.4   Rewards and Recognition

At *AtkinsRéalis*, we believe that recognition is vital in establishing and nurturing a mature HSE culture. To ensure that all *employees* are recognized for their commitment to the highest level of health, safety, and environmental protection, *AtkinsRéalis* must use the #WOW in Workday for recognition on all *controlled workplaces*.

This program is designed to include all *employees*, including senior management and encourage positive interactions and provide immediate feedback. This system focuses on rewarding proactive *risk* management behaviour to improve outputs. It must be a core tool for HSE leaders.

The intent of the recognition program is to reward efforts, not results. Recognition empowers all stakeholders to reinforce desired actions in a tangible way.

13.   Exceptions and deviations

In exceptional circumstances where Class 1 or Class 2 *governance documents* cannot be fully adhered to for legitimate purposes, *personnel* must submit a deviation request in the Deviation Tool as per the Deviation Process work instruction. *Deviations* from Class 1 or Class 2 *governance documents* must be raised and approved before taking any action unless an immediate deviation is necessary to protect one's health, safety or security.

Deviations from Class 3 *governance documents* must be managed and documented by the issuing *sector*, *region*, or *global business*.

The *deviation* process is not meant to address any known or suspected non-compliance with or breach of the Code of Conduct, of any other *governance document* or any violation of applicable laws or regulations.

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

25

14. Guidance

For questions or further information with respect to this **manual**, please contact hse@atkinsrealis.com.

Controls and tasks related to this document (if applicable)

1. All **AtkinsRéalis sectors**, **regions**, **global businesses**, and their **controlled workplaces** (offices, **projects**, operations) must implement and demonstrate compliance to the GHSEMS.
2. **AtkinsRéalis** expects business partners, such as associate companies or **joint ventures** where we do not have Principal **contractor** responsibility, as well as **contractors** and **suppliers** with whom we have involvement, to conform to equivalent HSE management requirements.

Related documents & regulations (if applicable)

Requirements for Non-Controlled Workplace Work Instruction

Corporate Governance Framework Policy

Internal and External Issues – SWOT Analysis Template

Needs and Expectations Register Template

Global HSE Policy Statement

AtkinsRéalis Sustainability Policy Statement

BlueSky2.0

Project Risk Management Procedure

HSE Criteria for Project Risk Register Work Instruction

Environmental Aspects Impacts Identification Work Instruction

Environmental Aspects and Impacts Register Template

Best Environmental Management Practices Guidelines

Critical Risk Control Protocols Guidelines

Job Hazard Analysis Work Instruction

Job Hazard Analysis Form

StepBack Work Instruction

StepBack Card

HSE Legal and Other Compliance Obligations Register Template

Contractor Management Procedure

Contractor Pre-Selection Form

Contractor Pre-Mobilization Form

Fit-for-Duty Procedure

HSE in Our Offices Procedure

Traffic Control Procedure

Working Alone Procedure

Business Resilience and Recovery Procedure

Emergency Response Plan Template

HSE Indicators Guidelines

HSE Global Assurance Audit Procedure

HSE Incident Management Procedure

Incident Flash Report Template

Lesson Learned Template

Code of conduct

Deviation Process Work Instruction

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

26

Appendix A – BlueBook Glossary

ALARP	As low as reasonably practicable
BEMP	Best Environmental Management Practices
BlueSky 2.0	HSE Statistics Database used to report and manage events, inspections, audits, corrective actions, etc. BlueSky 2.0 is powered by Enablon.
BRRP	Business Resilience and Recovery Program
Complaints	A claim of dissatisfaction brought to AtkinsRéalis by any interested party (e.g., clients, communities, general public, employees, etc.).
Compliance Obligations	Requirements that AtkinsRéalis must or chooses to comply with, including but not limited to legislation, contractual requirements, codes of practices, voluntary standards, etc.
CRCP	Critical Risk Control Protocols
CRO	Chief Risk Officer
CMT	Crisis Management Team
Environment	Surroundings in which controlled workplaces operate, including air, water, land, natural resources, flora, fauna, humans, and their interrelationships.
Environmental Aspect	Any element of controlled workplace's activities that can interact with the environment.
Environmental Impact	Any change to the environment, whether adverse or beneficial, wholly, or partially resulting from a project's Environmental Aspect.
EVP	Executive Vice-President
EXCOM	Executive Committee – group consisting of the President and CEO, the sector Presidents and the Executive Vice-Presidents of Corporate Functions
GHSE	Global Health, Safety and Environment
GHSEMS	Global Health Safety and Environment Management System
HSE	Health, Safety and Environment
HSSE	Health, Safety, Security and Environment
Incident	An unplanned energy release which results in an injury or damage.
ISO	International Organization for Standardization

Users must always verify that they use the most current version available at **atkinsrealis.com/internal-governance-library**

AtkinsRéalis - Baseline / Référence

27

Level 3 Environmental Incident	Situation involving any of the following: Poses immediate threat to human life / security or necessitates workplace evacuation or fire department intervention; persistent or extensive effect on water, soil, or air quality, major damage to aquatic or terrestrial ecosystem; contamination affects sensitive areas or protected species; closure of an extraction point/ water well for human consumption; water or soil contamination that spreads outside workplace boundaries; extensive decontamination required by specialized external resources; persistent and significant breach of permit / license or consent conditions; enforcement acti from regulatory authorities; potential prosecution or prosecution by regulatory authorities; hydrocarbon or hazardous substance spill or leak equal or greater than 200 litres to land or hydrocarbon or hazardous substance spill or leak equal or greater than 100 litres to water.
OH&S	Occupational Health and Safety
PPE	Personal Protective Equipment
Principal Contractor	Party or designate with primary responsibility whether legislative or contractual for HSE.
Recordable Incident	Medical aid, modified work, lost time or fatality
SEA	Significant Environmental Aspect
Sensitive Area	Includes but is not limited to watercourse, wetlands, storm sewer, wells, forest, urban environment, protected areas such as Ramsar sites, archaeological sites, marine protected areas and natural parks

SIF	Is an incident in a situation where the actual or potential release or exposure to a high energy source; and
	1. Absence of direct control; and
	2. There is an actual or potential for a worker to sustain an injury that is,
	    a) Life ending; or
	    b) Life threatening; or
	    c) Life altering.

SPOT	Safety, Project Oversight and Technology
SWOT Analysis	Analysis to identify internal strengths and weaknesses, as well as external opportunities and threats
SVP	Senior Vice-President
VP	Vice-President

Users must always verify that they use the most current version available at atkinsrealis.com/internal-governance-library

AtkinsRéalis - Baseline / Référence

28

AtkinsRéalis

Additional information
and various documents
related to Bluebook
are available on
our website.

AtkinsRéalis