



# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 1 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## 1. ABOUT THIS PRACTICE

### Purpose

This practice establishes the process and Environmental, Health, and Safety (EHS) criteria for evaluating and selecting contractors.

### Objective

This practice establishes minimum requirements for contractors performing work on/at Devon operated facilities.

### Scope

This practice includes requirements for the selection, monitoring, and EHS auditing of Devon contractors.

### Applicability

This practice applies to contractors at Devon operated facilities.

### Variances

None

### Superseded Documents

EHS Contractor Protocol

# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 2 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## 2. TABLE OF CONTENTS

1.	About this Practice.....	1
2.	Table of Contents.....	2
3.	Roles.....	4
4.	Practice Prerequisites .....	5
4.1	Practice Overview.....	5
4.2	Applicable Standards .....	5
5.	Requirements.....	6
5.1	Contractor Selection.....	6
5.1.1	Approved Suppliers .....	6
5.2	Contractor Monitoring .....	6
5.2.1	Operations.....	6
5.2.2	EHS .....	6
5.2.3	Supply Chain.....	6
5.2.4	Insurance.....	7
5.2.5	PSM & DOT Contractors.....	7
5.3	EHS Approved Allowance/Mitigation Plan .....	7
5.3.1	EHS Approved Allowance.....	7
5.3.2	EHS Mitigation Plan.....	7
5.4	EHS Contractor Audits .....	8
5.5	Contractor Drug and Alcohol Programs .....	9
6.	Terms and Definitions.....	10
7.	Document Management.....	12
7.1	Revision Details .....	12
7.2	Approval .....	12
7.3	Seeking and Approving Variances .....	12
7.4	Related Documents .....	12
8.	Additional Related Information .....	14
8.1	Verification of Conformance and Effectiveness .....	14
8.2	Training.....	14



# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 3 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

8.2.1 Employees .....	14
8.2.2 Contractors.....	14
Appendix A: Contractor Drug and Alcohol Requirements .....	16
Appendix B: SafeLand and RigPass Equivalent Training .....	24
Appendix C: Contractors and Entities Exempt from SafeLand or RigPass Training .....	25
Appendix D: Crude Oil Purchaser and Transporter EHS Requirements .....	26
Attachment A: EHS Approved Allowance Request Form .....	28
Attachment B: EHS Mitigation Plan Request Form.....	29
Attachment C: Contractor EHS Audit Notification Letter Template .....	30
Attachment D: Contractor EHS Audit Questionnaire Template .....	31
Attachment E: Contractor EHS Audit Agenda Template.....	32
Attachment F: Contractor EHS Audit Final Report Template .....	33
Attachment G: Approval, Review, and Modification History.....	34

# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 4 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## 3. ROLES

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Division/Business Unit Leadership	Reinforce adherence to this practice and provide resources for application of the practice. Check periodically to ensure the requirements of the practice are being met. Ensure employees responsible for contractor selection, monitoring, and EHS auditing are trained on this practice.
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Line Leadership	Understand how this practice applies to personnel in their area of responsibility. Ensure personnel have training, skills, knowledge, and understanding to comply with this practice. Check periodically to ensure the requirements of this practice are being met. Ensure all contractors performing work have a compliant Master Services and Supply Agreement (MSSA), insurance, and EHS status on the Approved Supplier Report (ASR).
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Environmental, Health, and Safety	Provide technical resources and tools for practice application. Monitor compliance through the audit process. Provide Division/Business Unit Leadership and Line Supervisors with contractor selection reporting. Ensure that the most current practices are posted to the <a href="#">supplier website</a> .
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Devon Employees	Adhere to the requirements of this practice and complete required training. Identify and report gaps in this practice. Use only contractors with an Approved or Use with Caution ASR status.
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Contract Company Representatives	Adhere to the requirements of this practice. Use only contractors with an Approved or Use with Caution ASR status.
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<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 5 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## 4. PRACTICE PREREQUISITES

### 4.1 PRACTICE OVERVIEW

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This practice provides information on contractor selection, monitoring, and EHS auditing.

### 4.2 APPLICABLE STANDARDS

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Devon Supply Chain and Procurement Policy

Devon Supplier Qualification Request Procedure

Devon Event Reporting and Investigation Protocol

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 6 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## 5. REQUIREMENTS

### 5.1 CONTRACTOR SELECTION

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#### 5.1.1 *Approved Suppliers*

5.1.1.1 Select Approved or Use with Caution contractors from the [Approved Supplier Report \(ASR\)](#).

5.1.1.2 If a contractor is listed as Not Approved in the ASR, do not use them for work on a Devon location.

**Note:** If work is necessary by a contractor listed as Not Approved, request approval by the Business Unit VP or Operations VP and document via email (or equivalent) prior to using the contractor.

5.1.1.3 If a contractor is not listed on the ASR, refer to the [Supplier Qualification Request Procedure](#) when a new supplier needs to be onboarded or a pre-existing supplier needs to be requalified.

### 5.2 CONTRACTOR MONITORING

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#### 5.2.1 *Operations*

5.2.1.1 Monitor contractor selection based on overall status (Approved/Use with Caution/Not Approved) on the ASR.

#### 5.2.2 *EHS*

5.2.2.1 Use the EHS Approved Allowance and/or EHS Mitigation Plan process ([Section 5.3](#)) when requesting the use of contractors that exceed Devon's Total Recordable Incident Rate (TRIR) and/or Experience Modification Rate (EMR) range thresholds.

#### 5.2.3 *Supply Chain*

5.2.3.1 Support the Operations team by maintaining the ASR and providing guidance as necessary related to the sourcing of contractors.

5.2.3.2 Manage strategic sourcing agreements and communicate to Operations the value, work details, and risk to the local Business Unit.

5.2.3.3 Ensure contractor agreements contain language holding both contractors and sub-contractors accountable to Devon practices.

# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 7 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## 5.2.4 Insurance

5.2.4.1 Ensure contractor's insurance programs are both active and adequate for the services provided to Devon.

5.2.4.2 Support Contracts Administration by ensuring contractor agreements mitigate as much financial risk to Devon through insurance and indemnity provisions as possible.

## 5.2.5 PSM & DOT Contractors

5.2.5.1 Ensure Process Safety Management (PSM) contractors are trained on the work practices to safely perform their job.

5.2.5.2 Ensure each Department of Transportation (DOT) contract pipeline employee has successfully completed Covered Task Qualification Training (when required) through an approved third-party evaluator.

## 5.3 EHS APPROVED ALLOWANCE/MITIGATION PLAN

If there is a compelling business need or technological advantage to use a contractor with a TRIR above 2.00 or an EMR above 1.30, an EHS Approved Allowance or EHS Mitigation Plan can be executed to override the non-compliance for TRIR and/or EMR.

### 5.3.1 EHS Approved Allowance

5.3.1.1 EHS Professionals will review contractors exceeding the threshold in TRIR and/or EMR to understand if an EHS Approved Allowance is acceptable based on their metrics/severity of incident(s)/mitigation efforts (e.g., less severe incidents or incidents not in scope for work performed on Devon locations). Use the [EHS Approved Allowance Request Form](#) (Attachment A) to request allowance approval.

5.3.1.2 EHS Supervisor (or delegate) reviews EHS Approved Allowance Requests and determines if approval will be granted.

5.3.1.3 If approval is granted, override will be applied for TRIR and/or EMR non-compliance.

### 5.3.2 EHS Mitigation Plan

5.3.2.1 Use the [EHS Mitigation Plan Request Form](#) (Attachment B) when contractors are not eligible for an EHS Approved Allowance (e.g., more severe incidents or incidents in scope for work performed on Devon locations).

# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 8 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

5.3.2.2 Work with EHS Supervisor (or delegate) to recap the contractor’s 3-year historical data and identify areas for improvement, corrective actions, completion targets, and responsible parties.

5.3.2.3 EHS and Operations leadership will meet with the contractor to review their EHS Mitigation Plan.

5.3.2.4 EHS Supervisor and Operators Superintendents (or delegates) review EHS Mitigation Plan Requests and determine if approval will be granted.

5.3.2.5 If approval is granted, override will be applied for TRIR and/or EMR non-compliance.

## 5.4 EHS CONTRACTOR AUDITS

5.4.1.1 Audit contractors as needed to ensure EHS requirements and regulatory compliance is being met. The following criteria may be considered when selecting contractors to be audited:

- Current EHS status (Compliant/Non-Compliant/Use with Caution)
- Previous audit records
- Recent incidents
- Type and classification of incidents encountered (e.g., SIF)
- Type of work performed and contractor competency
- Exposures associated with work to be performed
- Spend data
- Programs, training, and historical performance data

5.4.1.2 EHS is responsible to send the [Contractor EHS Audit Notification Letter](#) (Attachment C Template) with the [Contractor EHS Audit Questionnaire](#) (Attachment D Template) to the contractor prior to the audit. The [Contractor EHS Audit Agenda](#) (Attachment E Template) may be used.

5.4.1.3 Once the audit is complete, document any findings and corrective actions in the Event Reporting and Investigation System as required per the [Event Reporting and Investigation Protocol](#). Communicate the results of the audit to the contractor and the appropriate Operations leaders. The [Contractor EHS Audit Final Report](#) (Attachment F Template) may be used.





## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 9 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

### 5.5 CONTRACTOR DRUG AND ALCOHOL PROGRAMS

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#### 5.5.1.1 Require non-exempt contractors to be members of TPS Alert.

**Note:** See [Appendix A](#) for contractor drug/alcohol requirements.

# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 10 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## 6. TERMS AND DEFINITIONS

Approved	An overall status on the Approved Supplier Report (ASR) which indicates a contractor is approved for use at a Devon location.
Approved Supplier Report (ASR)	An internal report reflecting the approval status of Devon's exempt and non-exempt contractors.
Contract Company Representative	A contractor who is assigned responsibilities and oversight for a specific task that requires adherence to Devon EHS protocols.
EHS Approved Allowance	A process of approving contractors exceeding Devon's threshold in TRIR and/or EMR based on their metrics/severity of incident(s)/mitigation efforts (e.g., less severe incidents or incidents not in scope for work performed on Devon locations).
EHS Mitigation Plan	A process of approving contractors who are not eligible for an EHS Approved Allowance (e.g., more severe incidents or incidents in scope for work performed on Devon locations) to improve EHS performance/culture.
Equipment Commissioning Activity	Tasks related to initial start-up. Construction activities are not included.
Exempt Contractor	A contractor that is exempt from the Devon supplier agreement EHS requirements because of the goods or service they provide to Devon.
Manufacturer Representative	An individual who is employed by an equipment manufacturer. Their role is specifically to be an on-site representative of the equipment manufacturer.



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 11 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

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Non-Exempt Contractor	Any contractor that performs work on a location owned or operated by Devon Energy (or its affiliates) who must meet Devon's EHS requirements.
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Not Approved	An overall status on the ASR indicating a contractor is deficient in Agreement, Insurance, or EHS status and is not approved for use at a Devon location.
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Transportation Without Services	Transportation contractors that do not perform any task on location other than strapping or unstrapping their load and that remain at their vehicle at all other times while on location.
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Use with Caution	An overall status on the ASR indicating a contractor is deficient in Insurance or EHS requirements.
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# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 12 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## 7. DOCUMENT MANAGEMENT

### 7.1 REVISION DETAILS

The changes made to this Management Practice during the latest revision can be found in the [Contractor EHS Management Approval, Review, and Modification History](#) Attachment.

### 7.2 APPROVAL

This practice has been approved by:

Name	Title
Garrett Jackson	VP, ESG & EHS

### 7.3 SEEKING AND APPROVING VARIANCES

Variances to this document will be submitted in accordance with the EHS Document Control and Records Management Protocol.

### 7.4 RELATED DOCUMENTS

Document Name
<a href="#">Approved Supplier Report</a>
<a href="#">EHS Approved Allowance Request Form</a>
<a href="#">EHS Mitigation Plan Request Form</a>
<a href="#">Contractor EHS Audit Notification Letter Template</a>
<a href="#">Contractor EHS Audit Questionnaire Template</a>
<a href="#">Contractor EHS Audit Agenda Template</a>
<a href="#">Contractor EHS Audit Final Report Template</a>
<a href="#">Contractor EHS Management Approval, Review, and Modification History</a>
<a href="#">Contractor EHS Management Training</a>
<a href="#">Devon Field Safety Briefing Presentation</a>
<a href="#">Devon Field Safety Briefing Long Sheet - English</a>



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 13 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

[Devon Field Safety Briefing Long Sheet - Spanish](#)

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# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 14 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## 8. ADDITIONAL RELATED INFORMATION

### 8.1 VERIFICATION OF CONFORMANCE AND EFFECTIVENESS

- 8.1.1.1 Validate completion of the Devon Field Safety Briefing and SafeLand/RigPass (or equivalent) per requirements as outlined in this management practice through field engagement. Card or trainee lookup may be searched at <https://www.pectraining.com/card/Lookup.Mobile.aspx>.

### 8.2 TRAINING

#### 8.2.1 Employees

- 8.2.1.1 Devon Employees who will be involved in managing the contractor process will be trained on this management practice.

#### 8.2.2 Contractors

##### SafeLand, RigPass, or equivalent & Field Safety Briefing

- 8.2.2.1 Have SafeLand, RigPass, One Basin – One Way, Basin United, or equivalent safety course completion documentation prior to starting work on a Devon location. Equivalent safety courses will be approved by the EHS Supervisor in the Business Unit (see [Appendix B](#)). Contractors and entities listed in [Appendix C](#) are exempt from the requirement to complete SafeLand, RigPass, or an equivalent safety course.
- 8.2.2.2 Complete a Devon Field Safety Briefing within 30 days of starting work on Devon locations. Orientation can be given in person or taken online via Veriforce.
- 8.2.2.3 All “transportation without services” contractors are required to complete a Devon Transportation Safety Orientation via Veriforce and carry proof of training while on a Devon location or complete the Field Safety Briefing. Transportation-without-service contractors are exempt from the requirement to complete SafeLand, RigPass, or an equivalent safety course.
- 8.2.2.4 All crude oil purchaser and transporter contractors are required to complete a Devon Oil and Water Hauler Transportation Orientation via Veriforce and carry proof of training while on a Devon location or complete the Field Safety Briefing. Crude oil purchaser and transporter contractors are required to complete SafeLand, RigPass, or an equivalent safety course. See [Appendix D](#) for Crude Oil Purchaser and Transporter EHS Requirements.

##### Protocol Refresher Training



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 15 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

8.2.2.5 Devon contract PICs are required to complete an annual protocol refresher training in person.



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 16 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

### APPENDIX A: CONTRACTOR DRUG AND ALCOHOL REQUIREMENTS

#### ADDENDUM TO CONTRACTOR'S DRUG AND ALCOHOL POLICY

CONTRACTOR NAME \_\_\_\_\_

("Contractor Company") has adopted this Devon Energy Corporation ("Devon") Addendum to Contractor's Drug and Alcohol Policy ("Devon Addendum"), which supplements the drug and alcohol policies and/or programs of the Contractor Company. In the event of a conflict between the current drug and alcohol policies and/or programs of Contractor Company and this Devon Addendum, the Devon Addendum shall control.

#### 1.0 Purpose

The purpose of the Devon Drug & Alcohol Policy is to ensure a safe, healthy, and productive work environment for the personnel employed or engaged by contractors, as well as the employees and contractors of Devon, and to protect Devon property or jobsites from damage that might otherwise result from drug and alcohol use and/or abuse. Devon requires all contractors to adopt and enforce a written policy on drugs and alcohol that complies with the laws of the states in which each contractor performs work on or is present at Devon property or jobsites and meets the testing requirements Devon imposes on its own employees.

#### 2.0 Definitions

- A. Devon Property or Jobsites – all real or personal property, including but not limited to facilities, lease roads, lease locations, right-of-way, buildings, vehicles, products and equipment, either owned or controlled by Devon.
- B. Contractor Company – any and all contractors, vendors, and other third-party service providers and their personnel (including employees or agents of any of the foregoing as well as subcontractors and employees of subcontractors of any of the foregoing) authorized to perform work on or be present at Devon Property or Jobsites.
- C. DOT drug test – a drug test mandated by the Department of Transportation ("DOT"). DOT includes both the Federal Motor Carrier Safety Administration ("FMCSA") and the Pipeline and Hazardous Materials Safety Administration ("PHMSA").
- D. For Cause/Reasonable Suspicion Testing – if authorized by applicable state law, For Cause/Reasonable Suspicion Testing shall mean testing whenever there is a reasonable belief an employee is in violation of any of the prohibitions defined in the policy.
- E. Non-DOT drug test – a drug test not mandated by the DOT but in compliance with requirements combined in Attachment "A."
- F. Prohibited Substances – (1) illicit or un-prescribed drugs, controlled substances and mood or mind-altering substances, including marijuana, and any synthetic derivative/product that produces a marijuana-type high and any herbal products not intended for human consumption, (2) prescribed drugs used in a manner inconsistent with the prescription, and (3) alcoholic beverages.



# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 17 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

- G. Under the Influence – (1) the presence of a prohibited substance or metabolites of a prohibited substance in body fluids above the cut-off level established by this policy or (2) the presence of a prohibited substance that affects an individual in any detectable manner.

## 3.0 Prohibitions

This policy prohibits the following:

- A. Possessing or using prescription drugs or over-the-counter medication that may cause impairment, except when all the following conditions have been met:
  - I. The individual notifies his/her supervisor that he/she will be in possession of, or using, impairment-causing prescription drugs or over-the-counter medication and appropriate steps are taken to accommodate the possibility of impairment, including, but not limited to, removal from work for the period of possible impairment; and
  - II. Prescription drugs have been prescribed by a licensed physician authorizing the individual's use of such prescription drugs in a safety-sensitive position.
- B. Using, possessing, selling, manufacturing, distributing, concealing, or transporting on Devon property or jobsites any prohibited substance and/or illicit drug equipment or paraphernalia.
- C. Being under the influence of Prohibited Substances while performing any work on Devon property or jobsites.
- D. Switching or adulterating any urine, blood, or other sample used for testing.
- E. Performing work on Devon property or jobsites when an individual has tested positive or has refused testing.

Failure to comply with this section will result in immediate and permanent removal from Devon facilities.

## 4.0 Searches and Inspections

At any time, Devon supervisors, as well as their agents and assigns, may conduct unannounced searches and inspections of contractors and their property while on Devon property or jobsites. These searches may be unannounced and may include, but are not limited to, all personal property and its vicinity, and may include the use of contraband-detecting canines.

## 5.0 Testing

All specimen collection and handling shall be conducted in conformity with DOT collection requirements and guidelines and shall be sent to a SAMHSA/HHS-certified laboratory for analysis. Alcohol testing shall be conducted on devices approved by the National Highway Traffic Safety Administration (NHTSA) and in conformity with DOT alcohol testing requirements. For all tests, including all DOT-mandated alcohol tests, a breath- or blood-alcohol test yielding a 0.04 BAC or greater will be considered a positive result. Any employee who is found to have an alcohol concentration of 0.02 or greater, but less than 0.04, shall not perform or continue to perform safety-sensitive functions on Devon jobsites, nor shall an employer

## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 18 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

permit the employee to perform or continue to perform safety-sensitive functions on Devon jobsites, until the start of the employee's next regularly scheduled duty period, but not less than 24 hours following administration of the test. The employee must also have a negative breath- or blood-alcohol test twenty-four (24) hours following the original test as described above.

### A. *Pre-Employment/Pre-Access Screening and Drug Testing*

- I. Contractors are required to subject new hires to pre-employment drug testing, all meeting the requirements described in Attachment "A," and should receive a negative test result prior to their hire. DOT contractor employees will follow DOT guidelines for pre-employment drug testing.
- II. All contractors are required to provide a drug screen test result for selected employees.
  - a. Contractors who have not conducted random testing can achieve compliance by instituting a program that includes random testing using a scientifically based random selection process and subjecting employees eligible to work on Devon property or jobsites to testing that meets the requirements of the Devon drug and alcohol policy.

### B. *For Cause/Reasonable Suspicion Testing*

Devon Cause/Reasonable Suspicion Testing, in compliance with requirements of the Devon drug and alcohol policy and Attachment "A," shall be performed whenever authorized or allowed under state law. A contractor's employee may be required to undergo drug and alcohol testing any time it is reasonably believed that an employee may be under the influence of drugs and/or alcohol. A contractor's employee removed from Devon property or jobsites for For Cause/Reasonable Suspicion Testing will not be allowed to return to work on Devon property or jobsites until a negative test result is received.

### C. *Incident-Related Testing (Post-Incident Testing)*

- I. At a minimum, but subject to applicable federal, state, and local laws or regulations, post-incident testing meeting the requirements described in the Devon drug and alcohol policy and Attachment "A" is required when a contractor's employee causes or contributes to a work-related incident.

### D. *Random Testing*

All Non-DOT company employees are subject to unannounced random testing for alcohol and the Non-DOT substances described in Attachment "A" using a scientifically based random selection process that ensures each employee has an equal chance of being tested each time selections are made. As described in Attachment "B," drug tests should be conducted at an annual rate of at least 25% and spread reasonably throughout the year (i.e., 6.25% per quarter), and alcohol tests should be conducted at an annual rate of at least 10% and spread reasonably throughout the year (i.e., 2.5% per quarter). Once a contractor's employee has been informed of his or her selection for random drug and/or alcohol testing, the contractor's employee will be instructed to report immediately to the collection site—"immediately" meaning an amount of time not to exceed normal and customary commute time to the designated collection site plus thirty (30) minutes. Failing to report to the collection site, refusing to submit to a test, or adulterating a specimen is considered the same as a positive test, and the contractor's employee will be prohibited from entering Devon



# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 19 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

property or jobsites. A contractor's DOT employees will be subject to testing under DOT-published guidelines.

## 6.0 Additional Testing

To the extent allowed by state law, contractors' employees on Devon property or jobsites are subject to unannounced drug and alcohol testing. This testing is scheduled at Devon's sole discretion. This testing may include, but is not limited to, all contractors' employees on Devon property or jobsites, or may apply to a particular shift, crew, location, craft, or contractor or other similar category, including a random selection based on site access records.

## 7.0 Violation Consequences and Contractor Discretion

Any contractor's employee who refuses to cooperate with the searches and tests included in this Devon drug and alcohol policy and/or their company's policy, or are found in violation of either the Devon drug and alcohol policy or the contractor's company policy, are subject to permanent removal from all Devon property or jobsites.

## 8.0 Substance Abuse Awareness and Supervisor Training

Contractors are to provide training on the contents of this Devon drug and alcohol policy, recognition of performance indicators suggesting probable drug or alcohol use, and the detrimental effects on personal health and workplace safety that can result from drug or alcohol use.

## Applicable Laws

Contractors will comply with all applicable federal, state, and local drug- and alcohol-related laws and regulations (i.e., DOT regulations, Department of Defense (DOD) Drug-Free Workplace Policy, Drug-Free Workplace Act of 1988, etc.), and to the extent this policy conflicts with the above, the federal, state, and local laws prevail.

## 9.0 Audit

Devon reserves the right, at its discretion, to perform unannounced audits of the contractor's drug and alcohol program to verify a contractor's policy and its enforcement comply with this policy.

Records required to be maintained by this policy will be available for inspection by Devon or its agent during the period the contractor is performing work for Devon and for a period of three (3) years after the contractor ceases to perform work for Devon.

The contractor will provide all information requested by Devon deemed necessary to establish and confirm the contractor's full compliance with the requirements of the contractor's policy and/or this policy.



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 20 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

In the event the contractor is subjected to an audit to verify compliance, the contractor will be required to provide drug test results that comply with the requirements of this policy.

# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 21 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## ATTACHMENT "A" Required Non-DOT Drug Tests & Cutoffs

TYPE OF DRUG Initial Test Analyte	INITIAL TEST Cutoff Concentration	CONFIRMATORY TEST Analyte	CONFIRMATORY TEST Cutoff Concentration
6-AM	10 ng/mL	6-AM	10 ng/mL
AMP/MAMP	500 ng/mL	Amphetamine Methamphetamine	250 ng/mL 250 ng/mL
Barbiturates	300 ng/mL	Amobarbital Butabarbital Butalbital Pentobarbital Phenobarbital Secobarbital	200 ng/mL 200 ng/mL 200 ng/mL 200 ng/mL 200 ng/mL 200 ng/mL
Benzodiazepines	300 ng/mL	Alprazolam Diazepam Ethyflurazepam Lorazepam Nordiazepam Oxazepam Temazepam	300 ng/mL 300 ng/mL 300 ng/mL 300 ng/mL 300 ng/mL 300 ng/mL 300 ng/mL
Cocaine	150 ng/mL	BZE	100 ng/mL
Marijuana	50 ng/mL	THCA	15 ng/mL
Methadone	300 ng/mL	Methadone EDDP	200 ng/mL 200 ng/mL
COD/MOR	2000 ng/mL	Codeine Morphine	2000 ng/mL 2000 ng/mL
OXYC/OXYM	100 ng/mL	Oxycodone Oxymorphone	100 ng/mL 100 ng/mL
Propoxyphene	300 ng/mL	Propoxyphene	200 ng/mL
Phencyclidine	25 ng/mL	Phencyclidine	25 ng/mL
MDMA/MDA	500 ng/mL	MDA MDMA	250 ng/mL 250 ng/mL
HYC/HYM	300 ng/mL	Hydrocodone Hydromorphone	100 ng/mL 100 ng/mL
<b><u>ALL ALCOHOL TESTING METHODS USED:</u></b> Saliva or breath		<u>Screen Level</u> .020	<u>Confirmation Level</u> .040

# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 22 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## Required DOT Drug Tests & Cutoffs

TYPE OF DRUG Initial Test Analyte	INITIAL TEST Cutoff Concentration	CONFIRMATORY TEST Analyte	CONFIRMATORY TEST Cutoff Concentration
<b>Marijuana metabolites</b>	50 ng/mL	THCA <sup>1</sup>	15 ng/mL
<b>Cocaine metabolites</b>	150 ng/mL	Benzoyllecgonine	100 ng/mL
<b>Opioid metabolites:</b> Codeine/Morphine	2000 ng/mL	Codeine Morphine	2000 ng/mL 2000ng/mL
6-acetylmorphine (6-AM)	10 ng/mL	6-acetylmorphine (6-AM)	10 ng/mL
Hydrocodone/Hydromorphone	300 ng/mL	Hydrocodone Hydromorphone	100 ng/mL 100 ng/mL
Oxycodone/Oxymorphone	100 ng/mL	Oxycodone Oxymorphone	100 ng/mL 100 ng/mL
<b>Phencyclidine (PCP)</b>	25 ng/mL	Phencyclidine	25 ng/mL
<b>Amphetamines:</b> AMP/MAMP	500 ng/mL	Amphetamine Methamphetamine	250 ng/mL 250 ng/mL
MDMA/MDA	500 ng/mL	MDMA <sup>2</sup> MDA <sup>3</sup>	250 ng/mL 250 ng/mL
<b><u>ALL ALCOHOL TESTING METHODS USED:</u></b> Saliva or breath		<u>Screen Level</u> .020	<u>Confirmation Level</u> .040

<sup>1</sup>Delta-9-tetrahydrocannabinol-9-carboxylic acid

<sup>2</sup>Methylenedioxyamphetamine (MDMA)

<sup>3</sup>Methylenedioxyamphetamine (MDA)



# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 23 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## ATTACHMENT "B" Policy & Testing Requirements

<b>NON-DOT Drug Percentage</b>	<b>25% yearly</b> (10% in first six months)
<b>NON-DOT Alcohol Percentage</b>	<b>10% yearly</b> (4% in first six months)
<b>PHMSA Drug Percentage</b>	<b>50% yearly</b>
<b>PHMSA Alcohol Percentage</b>	<i>Not required</i>
<b>FMCSA Drug Percentage</b>	<b>50% yearly</b>
<b>FMCSA Alcohol Percentage</b>	<b>10% yearly</b>
<b>FRA Drug Percentage</b>	<b>25% yearly</b>
<b>FRA Alcohol Percentage</b>	<b>10% yearly</b>
<b>FRA-MOW Drug Percentage</b>	<b>25% yearly</b>
<b>FRA-MOW Alcohol Percentage</b>	<b>10% yearly</b>
<b>USCG Drug Percentage</b>	<b>50% yearly</b>
<b>USCG Alcohol Percentage</b>	<i>Not required</i>

## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 24 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

### APPENDIX B: SAFELAND AND RIGPASS EQUIVALENT TRAINING

#### Mandatory Training Topics

1. Confined Space
2. Hydrogen Sulfide
3. Hot Work
4. Lockout/Tagout
5. Hazard Communication
6. Electrical Safety
7. Intervention/Stop Work Authority
8. Walking Working Surfaces
9. Job Safety Analysis/Pre-Job Planning
10. Personal Protective Equipment, Respiratory
11. Working at Heights
12. Site Specific Hazards and Emergency Evacuation
13. Environmental – Spill Prevention

#### Optional Training Topics

1. Material Handling
2. Excavation and Trenching
3. Industrial Hygiene/Respiratory Protection
4. Incident Investigation
5. Behavioral Safety



# Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 25 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## APPENDIX C: CONTRACTORS AND ENTITIES EXEMPT FROM SAFELAND OR RIGPASS TRAINING

Contractors and entities listed below are exempt from the requirement to complete SafeLand, RigPass or an equivalent safety course, specified in Step 8.2.2.1:

- Truck drivers who are only delivering the following materials
  - Rock
  - Dirt
  - Concrete
  - Sand
- Participants of a tour group
- Porta-Potty Companies
- Trash/Roll off delivery/pickup
- Propane delivery
- Government regulators
- Archeologist
- Companies listed below while working on their easement
  - Utility providers (rural water, electric co-op etc.)
  - 3rd party gas gatherers (OneOk, Enlink etc.)
- Janitorial crews cleaning living quarters and office spaces
- Catering crews
- Manufacturer representatives performing equipment commissioning activities on Devon assets.  
The manufacturer representative will be escorted by a Devon Representative.

**Note:** Modifications to this Appendix will be approved by the Superintendent of the Business Unit requesting the modification, and the EHS Supervisor(s).

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 26 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

## APPENDIX D: CRUDE OIL PURCHASER AND TRANSPORTER EHS REQUIREMENTS

Each of Devon Energy Production Company, L.P., WPX Energy Permian, LLC, and WPX Energy Williston, LLC (collectively, “Devon”) expects anyone working at its facilities to follow the environmental, health and safety procedures and practices, or employ comparable environmental, health and safety procedures and practices. Further, Devon expects purchasers and transporters of crude oil, to follow the minimum requirements listed below.

1. Complete SafeLand, RigPass or equivalent course and have documentation available if requested to validate completion of the course.
2. Complete Devon’s online Oil and Water Hauler Transportation Orientation through Veriforce.com. A hard hat sticker can be obtained after providing proof of course completion to a Devon representative.
3. Wear Minimum Personal Protective Equipment:
  - a. Flame Resistant Clothing (FRC) worn as the outermost layer
  - b. Hardhat that meets ANSI Z89.1
  - c. Safety glasses w/side shields or prescription eyewear that meets ANSI Z87.1
  - d. Safety toed footwear that meets ANSI Z41.1
  - e. 4-Gas Monitor worn in the breathing zone
4. Complete Hydrogen Sulfide (H<sub>2</sub>S) training prior to arriving on site where H<sub>2</sub>S signs are posted.
5. Smoking (including e-cigarettes) is not allowed unless a designated smoking area is identified with signage.
6. Observe wind direction and park vehicle upwind of work location when possible.
7. Vehicle driver is responsible for the vehicle being secured when it’s left unattended.
8. Properly bond and ground transport truck and hoses prior to fluid transfer.
9. Use vent hoses when available and attach to Vapor Recovery Unit (VRU) or closed loop system. Signage will be posted on location to identify sites with closed loop requirements.
10. Dispose of tank car seals and other waste in a designated receptacle.
11. Stay alert. Stay out of the truck cab and remain in close proximity to vehicle while transferring fluids to visually and audibly monitor for changes warranting stop work. Monitor connections, truck and tank levels.
12. Ensure all valves are completely closed prior to disconnecting hoses.
13. Remove spilled or excess fluid from catch basins prior to leaving location. Clean or wipe up drips of fluid on the equipment.
14. Ensure caps and plugs are properly installed on load lines prior to leaving.
15. When authorized by Devon, opening, closing and latching of thief hatches is allowed. Ensure thief hatches are closed and properly secured before leaving location. Adjusting or modifying the thief hatch mechanical operation is not permitted.
16. Transporter must have appropriate DEPCO Safety Data Sheet (SDS) for Crude Oil and Condensate being transported. DEPCO SDS can be found on Devon’s public website: <http://www.devonenergy.com/operations/supply-chain/material-data>
  - Crude Oil (Sweet)



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 27 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

- Crude Oil (Sour)
  - Condensate (Sweet)
  - Condensate (Sour)
17. Report all incidents and near misses to Devon personnel or utilize the onsite emergency number. Reportable incidents include but are not limited to: injuries, property damage, spills, and fires.
18. Purchaser is responsible for the cleanup and remediation of spills associated with the transported fluid. Contact Devon personnel before attempting to remediate a spill.



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 28 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

### ATTACHMENT A: EHS APPROVED ALLOWANCE REQUEST FORM

[EHS Approved Allowance Request Form](#)



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 29 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

### ATTACHMENT B: EHS MITIGATION PLAN REQUEST FORM

[EHS Mitigation Plan Request Form](#)



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 30 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

### ATTACHMENT C: CONTRACTOR EHS AUDIT NOTIFICATION LETTER TEMPLATE

[Contractor EHS Audit Notification Letter Template](#)



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 31 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

### ATTACHMENT D: CONTRACTOR EHS AUDIT QUESTIONNAIRE TEMPLATE

[Contractor EHS Audit Questionnaire Template](#)



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 32 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

### ATTACHMENT E: CONTRACTOR EHS AUDIT AGENDA TEMPLATE

[Contractor EHS Audit Agenda Template](#)





## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 33 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

### ATTACHMENT F: CONTRACTOR EHS AUDIT FINAL REPORT TEMPLATE

[Contractor EHS Audit Final Report Template](#)



## Contractor EHS Management

<b>Hierarchy Level:</b> Standard	<b>Document Type:</b> Management Practice	<b>Page:</b> 34 of 34
<b>Owner:</b> VP, ESG & EHS	<b>Applies to:</b> Devon US	<b>Doc. ID:</b> 119177025
<b>Last Revised:</b> 12/18/2023	<b>Review Cycle:</b> Every 3 Years	<b>Implemented:</b> 10/4/2018

### ATTACHMENT G: APPROVAL, REVIEW, AND MODIFICATION HISTORY

[Contractor EHS Management Practice Approval, Review, and Modification History](#)