

QEHS

Contractor Management SOP

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QEHS-SOP-ZZ-000004	QEHS Contractor Management SOP	24/09/2024	Rev 12
Creator / Owner		Reviewer (Optional)	Current Approver
Sabrina Barrett		N/A	Paul Murphy

Revision History

Revision	Date	Change Description	Approver
00-10	2007-2021	Revision history of SOP changes & updates can be viewed at the end of this document.	Michael O Connor
11	24/09/2024	Updated to supersede EHS-SOP-ZZ-000002, which included minimum requirements for ESG & Quality. Owner changed & new Doc ID given.	Michael O Connor
12	05/02/02025	Creator and Approver names updated. Classification code changed to Public. Removal of Sustainability from title page	Paul Murphy

Classification Code: A code needs to be selected from below.

Confidential: Highly sensitive information, very limited access	<input type="checkbox"/>
Restricted: Specific team or department access only.	<input type="checkbox"/>
Internal Use: Company wide access	<input type="checkbox"/>
Public: Openly shared	<input checked="" type="checkbox"/>

Contents

1.0	Purpose	3
2.0	Scope.....	3
3.0	Discipline.....	4
4.0	Pre-qualification QEHSS Assessments	4
5.0	Contract Formation.....	5
6.0	Mobilisation and Work.....	5
6.1	Pre-mobilisation engagement	5
6.2	Continuous support and surveillance	6
6.3	Feedback to Procurement Department / Approved Contractor Register	7
7.0	Related Files	7
8.0	Compliance	7
9.0	Revision History	7
10.0	Appendix 1 – Safety Terms, Conditions and Responsibilities for Agency Personnel / Consultants	9
11.0	Appendix 2 – Safety Terms, Conditions and Responsibilities for Contractors	10
12.0	Appendix 3 – Environmental, Social & Governance (ESG) Terms, Conditions and Responsibilities for Agency Personnel / Consultants & Contractors	16
13.0	Appendix 4 – Quality Terms, Conditions and Responsibilities for Agency Personnel / Consultants & Contractors	17
14.0	Appendix 5 - Contractor Request for QEHSS Deviation	20
15.0	Appendix 6 - Contractor Pre-mobilisation Readiness Check sheet.....	21
16.0	Appendix 7 - Contractor Inspection/Audit Check sheet	23
17.0	Appendix 6 - Contractor Consequence Management / Disciplinary Process.....	24

1.0 Purpose

Mercury Engineering places Quality, Environmental, Health, Safety & Sustainability (QEHS) as a core value in all its' activities and work locations. Mercury Engineering recognises that, in order to do this effectively, the full supply chain must fully support and commit to a similar standard.

Mercury Engineering believes that only by working closely and collaboratively with its supply chain, jointly focusing on common QEHS objectives, can a measurable and sustainable environmental, health and safety performance be secured. This document describes the Mercury Engineering Contractor QEHS engagement processes, including:

- QEHS Pre-qualification assessments to support selection of only those Contractors who share the Mercury QEHS values;
- Contract formation, in order to formally document the agreements made during the Pre-qualification process;
- Structured Contractor mobilisation to support positive QEHS outcomes for both Mercury Engineering and also the Contractor;
- Ongoing Site QEHS engagement, monitoring and performance management; and
- Closure of the loop between Project Sites and the Procurement/Contracts department by providing feedback on QEHS performance and recommendations on engagement for future work.

2.0 Scope

This document applies to all Contractors, Agency staff and Consultants engaged by Mercury Engineering.

Note: For the avoidance of doubt, reference to "Contractor" within this document shall, where relevant, be construed to mean "Subcontractor".

3.0 Discipline

- Mechanical
- Electrical
- Technologies
- Fire Protection
- Civils, Structural and Architecture (CSA)

4.0 Pre-qualification QEHSS Assessments

Mercury Engineering Procurement Department maintains a Register of Approved Contractors and this is available for review by all Mercury staff on the internal Mercury IT network (Mercury Procurement Department SharePoint):

- <https://mercury1.sharepoint.com/sites/share/SubcontractorDirectory/SitePages/Home.aspx>.

Mercury Engineering do not engage Contractors, who are not on this Approved Contractor Register.

Mercury Engineering will carry out a formal business assessment of all new potential Contractors, before they are added to this Register; and QEHSS is a core part of this business assessment.

This QEHSS assessment process can be summarised as:

- A Mercury Pre-qualification questionnaire is issued to all new potential Contractors. This Pre-qualification questionnaire is held by Mercury Procurement Department and reviewed and updated by QEHSS/Procurement on an annual basis;
- Potential Contractors complete and return this Pre-qualification questionnaire and provide detail on their QEHSS Management systems (e.g. QEHSS Policies, QEHSS external accreditations, Safety Statements, QEHSS Risk Assessment procedures, recent QEHSS performance and also details on any regulatory non-compliances) and also their Insurance policies;
- Potential Contractors are also requested to confirm compliance with the *Contractor Minimum QEHSS Requirements* (refer to Appendix 1 and Appendix 2 of this document);

- The Pre-qualification documents are assessed in the Mercury Sandyford Office by Procurement Department and the relevant Mercury QEHSS Sector Lead; and
- Upon confirmation of satisfactory completion of the business assessment (including the QEHSS assessment), the Contractor may be registered onto the Mercury Engineering Approved Contractor Register.

Contractors are not permitted to begin work on site until their Insurances Policies are approved, in addition to their other supporting QEHSS documentation. Purchases orders cannot be raised, and payments issued until it is confirmed that Contractors have valid Insurance Policies.

Contractors on the Approved Contractors Register are reassessed on a periodic basis. This includes review of their QEHSS performance on Mercury Project sites (refer to Section 6.0 of this document).

5.0 Contract Formation

QEHSS forms a key component of all Contracts between Mercury Engineering and its' Contractors. This includes both the *Contractor Minimum QEHSS Requirements* (refer to Appendix 1 and Appendix 2 of this document) and also the Project-specific QEHSS Plan.

Deviations from the *Contractor Minimum QEHSS Requirements* are not permitted without the written approval of Mercury Project/Contracts Manager, Sector QEHSS Lead and Mercury Group QEHSS Manager (refer to Appendix 3 of this document).

6.0 Mobilisation and Work

6.1 Pre-mobilisation engagement

Mercury Engineering Package Manager will complete a Pre-mobilisation Kickoff Meeting with all Contractors, prior to the start of any physical activity on site. As a minimum, this meeting

will be attended Mercury Engineering Package Manager, Mercury Site QEHSS and the Contractor's Authorised Site Representative. This meeting will be documented in the formal Contractor Pre-mobilisation Readiness checksheet (refer to Appendix 4 of this document, which contains the minimum QEHSS requirements to support mobilisation).

6.2 Continuous support and surveillance

Mercury Engineering will support the Contractor's understanding and compliance with *Contractor Minimum QEHSS Requirements* (refer to Appendix 2 of this document) and also the Project-specific QEHSS Plan. Examples of this support includes:

- QEHSS Induction and Site-specific orientation for all its' employees;
- Review of Contractor Risk Assessments and Method Statement (RA/MS);
- Review of Last-Minute-Risk-Assessments (i.e. the SPAs) and associated coaching of Contractor supervision and workforce;
- Joint Mercury / Contractor Site QEHSS Walkdowns and Inspections;
- Regular meetings with Contractor; and
- Regular QEHSS Bulletins and Tool Box Talks (TBTs).

Mercury Engineering will document Contractor's QEHSS performance in a number of ways:

- Inspections/audits of Worksite and Contractor's activities;
- Weekly QEHSS Compliance Reports;
- Periodic review of the Good Catch / Near Miss Logs (focus on timeliness of correction of issues)
- Periodic review of QEHSS Violations / Disciplinary Register;
- Periodic QEHSS audits of the Contractor (refer to Appendix 5); and
- Formal issue of Non-Conformance-Reports (NCRs).

Mercury Engineering reserves the right to Pause the Work in the event of QEHSS concerns. The Contractor shall undertake corrective action and support the restart of work in a timely manner.

Mercury Engineering implement a disciplinary code on its sites, which allows for warnings to be issued and recorded. Mercury Engineering reserves the right to suspend or permanently remove the Project access privileges of both the Contractor and also Contractor personnel in the event of significant breaches of QEHSS requirements. This is described in Appendix 6 of this document.

In the event of a Contractor employee having his Site Access privileges removed from a Mercury Project Site, this loss of access privileges is automatically applied to all Mercury Sites. The only exception this is when Sub-contractor submits a written improvement plan, which is reviewed and accepted in writing by both Sector Operations Director and also the Mercury Group QEHSS Manager (Mick O'Connor).

6.3 Feedback to Procurement Department / Approved Contractor Register

Mercury Engineering operates a continuous improvement programme with respect to its Contractors (i.e. continue to use high-performance Contractors and removal of non-performing Contractors from its' Approved Contractor Register). QEHSS performance is one element of this improvement programme.

Mercury Engineering Site QEHSS and Project Manager will support this programme by providing regular feedback to Mercury Engineering Sector QEHSS Leads and also the Home Office (QEHSS and Procurement Departments) on the Contractor's QEHSS performance. This will include:

- Copies of all QEHSS Non-Conformance-Reports (NCRs);
- Copies of Contractor QEHSS audits, which are scored (refer to Appendix 5 of this document);
- Periodic review of both the BIM30 QEHSS Issues Register and also the Good Catch / Near Miss Logs (focus on timeliness of correction of issues); and
- Periodic review of QEHSS Violations / Disciplinary Register.

In the event of poor QEHSS performance and lack of compliance with the Contractor Minimum QEHSS Requirements (refer to Appendix 2 of this document) and also the Project-specific QEHSS Plan, Mercury Engineering will remove the Contractor from the Approved Contractor Register.

7.0 Related Files

None

8.0 Compliance

Refer to Compliance Project Procedures & Controls Review "Checklist": **Section 8**

9.0 Revision History

REVISION HISTORY				
Rev	Reason	Prepared By	Approved By	Date
Rev. 00	Issue for review	Shay Lacey	D Morgan	31/10/07
Rev. 01	Approved	Shay Lacey	D Morgan	13/10/09
Rev. 02	Updated legislation and publications	Shay Lacey	D Morgan	13/04/2012

REVISION HISTORY				
Rev	Reason	Prepared By	Approved By	Date
Rev. 03	Full review	Enda Scarlett	Shay Lacey	17/06/2013
Rev. 04	Policy Update	Enda Scarlett	Shay Lacey	30/10/2013
Rev. 05	Full review and issue for use	Enda Scarlett	Michael O Connor	03/02/2014
Rev. 06	Policy update, full review and issue for use	Enda Scarlett	Michael O Connor	22/04/2014
Rev. 07	Full review and issue for use	Enda Scarlett	Michael O Connor	30/06/2015
Rev. 08	Full review reformat and issue for use	Enda Scarlett	Michael O Connor	05/05/2017
Rev. 09	<ol style="list-style-type: none"> 1. SOP updated to include Sector QEHSS Leads comments 2. Incorporation of SOP-QEHSS-00031 into this document 3. Formalising Contractor Minimum QEHSS requirements 4. Formalising Contractor QEHSS auditing requirements 	James Jones	Michael O Connor	24/05/2019
Rev.10	Update to SOP contact details	Sabrina Barrett	Michael O Connor	09/03/2021
Rev 11.	Updated to supersede EHS-SOP-ZZ-000002, which included minimum requirements for ESG & Quality.	Paul Murphy	Michael O Connor	24/09/2024

If you have questions about this SOP or would like to suggest improvements to it or its related documents, please contact a member of the **Group QEHSS Department**.

10.0 Appendix 1 – Safety Terms, Conditions and Responsibilities for Agency personnel / Consultants

- 1.1 Agency personnel / Consultant (“AP/C”) shall complete the Mercury Engineering on-line QEHSS Induction, minimum 24 hours prior to mobilisation to the Project. Agency personnel / Consultants will then complete a site-specific QEHSS orientation, prior to the issue of a Project access badge.
- 1.2 AP/C shall have the relevant health and safety cards applicable to the jurisdiction they are undertaking works in (examples: Ireland Safe Pass; UK CSCS cards; Benelux VSC, etc), prior to mobilising to a Mercury Engineering Project.
- 1.3 AP/C shall be competent for their assigned Project role and will complete both all Project-required QEHSS training and also all training required by law and regulation.
- 1.4 AP/C shall ensure that all its work is carried out in accordance with all relevant QEHSS laws and regulations and take into account the safety of others on the site and the general public.
- 1.5 AP/C shall ensure that its work is carried out in accordance with the Mercury Engineering QEHSS policies, procedures and works processes.
- 1.6 AP/C shall participate in the Mercury Engineering risk management processes (e.g. Risk Assessment / Method Statement and Last-Minute-Risk-Assessment / Safe Plan of Action) as directed by Mercury Engineering management and supervision.
- 1.7 AP/C shall participate in any QEHSS audit, QEHSS Inspection and QEHSS Observation programme, as directed by Mercury Engineering management and supervision.
- 1.8 AP/C shall comply with the Mercury Engineering Incident and Injury Reporting Policy and also the Mercury Engineering Return to Work protocols.
- 1.9 A Drug and Alcohol Policy is in effect on all Mercury Engineering sites. AP/C shall comply with this policy. Any persons found under the influence of drugs and/or alcohol may have their Project access privileges suspended. On some projects in which Mercury Engineering is employed, our Clients operate mandatory random screening programme and results are communicated to the individual and Mercury Engineering. AP/C may have their Project Site access privileges suspended or removed, depending on the results.
- 1.10 Mercury Engineering implement a disciplinary code on its sites, which allows for warnings to be issued and recorded. Mercury Engineering reserves the right to suspend or permanently remove the Project access privileges of AP/C in the event of significant breaches of QEHSS requirements.

11.0 Appendix 2 – Safety Terms, Conditions and Responsibilities for Contractors

General

- 1.1 Mercury Engineering is committed to both protecting the health and safety of all people on our Projects and also ensuring that our activities are not harmful to the environment and the community. The Contractor shall have a similar policy.
- 1.2 Mercury Engineering recommends that the Contractor has a Safety Management System in place, i.e. ISO 45001.
- 1.3 Mercury Engineering has a comprehensive Safety Statement. This is disseminated throughout all Mercury Projects and available upon request to all Contractors.
- 1.4 Mercury Engineering will prepare a Project QEHSS Plan. The Contractor shall comply with the requirements of this Project QEHSS Plan and fully co-operate with the arrangements made to ensure health and safety on site.
- 1.5 In the event that Mercury Engineering's Client has specific QEHSS requirements, then Mercury Engineering will communicate these to the Contractor for its implementation.
- 1.6 The Contractor shall ensure that all work is carried out in accordance with all relevant QEHSS laws and regulations and take into account the safety of others on the site and the general public.
- 1.7 The Contractor shall provide all necessary information that is required for inclusion in the "Health and Safety File" as required by local legislation.

Risk Management

- 1.8 The Contractor shall ensure that all tasks and activities are planned, and risk assessed, via a Risk Assessment / Method Statement (RAMS) process. The Contractor shall not commence any activity on Site until the associated RAMS has been reviewed and accepted by Mercury Engineering. The Contractor shall ensure that RAMS are:
 - Submitted to Mercury Engineering a minimum of 3 weeks (or as early as contractually feasible) before work commences;
 - Compliant with these Minimum QEHSS Requirements and also the Project QEHSS Plan;
 - Inclusive of details on methodology/sequence of works; plant; tools and equipment; personnel; first aid and emergency arrangements; training, skills and competence;
 - Inclusive of details of any High-Risk-Activities (HRA) and specific risk reduction measures for these; and
 - Prepared in the Mercury Engineering format, unless the Contractor proposed format has been formally approved in writing by Mercury Engineering.
- 1.9 The Contractor shall fully support and comply with both the Mercury Engineering morning "White Board" Meetings and also the Daily Activity Bulletins (DABs) programmes. This will include highlighting any High-Risk-Activities (HRAs).
- 1.10 The Contractor shall comply with the requirements of Mercury Engineering Construction/ Commissioning Permit to Work programmes to mitigate the risks of High-Risk-Activities (HRAs). These may include third party (General Contractor / Client) Permit to Work programme where applicable. These will include: Permit to Dig/Excavate; Lock Out/Tag Out; hot work permit; confined space entry; electrical; work at height; ladder use permit; etc.
- 1.11 The Contractor shall implement a programme of Last-Minute-Risk-Assessments, which shall take place at the task location and involve a documented daily discussion between the supervisor and work party, including any High-Risk-Activities (HRAs). The Contractor shall use the Mercury Engineering Safe Plan of Action (SPA) format,

or third party (General Contractor / Client) SPA formats where applicable, to manage this process, unless otherwise approved in writing by Mercury Engineering Group QEHSS Manager.

- 1.12 Prior to the commencement of any Mercury Engineering Project or defined scope of work, Mercury Engineering reserves the right to conduct an QEHSS Readiness Review to ensure that all Project QEHSS programs and elements are in place and functioning per the defined project QEHSS Plan and/or RAMS. The Contractor shall ensure that all deficiencies found and documented during this review are rectified (or an approved plan in place) prior to the commencement of the work.
- 1.13 Mercury Engineering reserves the right to Pause the Work in the event of QEHSS concerns. The Contractor shall undertake corrective action and support the restart of work in a timely manner.

Project Induction and QEHSS Training

- 1.14 The Contractor shall ensure that all its direct employees and sub-contractors complete the Mercury Engineering on-line QEHSS Induction, minimum 24 hours prior to mobilisation to the Project. Mercury Engineering will then complete a site-specific QEHSS orientation, prior to the issue of a Project access badge.
- 1.15 The Contractor shall ensure that all its direct employees and sub-contractors have the relevant health and safety cards applicable to the jurisdiction they are undertaking works in (examples: Ireland Safe Pass; UK CSCS cards; Benelux VSC, etc.)
- 1.16 The Contractor shall ensure that all its direct employees and sub-contractors are competent for their assigned Project role and have completed both all Project-required QEHSS training and also all training required by law and regulation. The Contractor shall maintain written QEHSS training records for all its direct employees and sub-contractors and shall provide these records to Mercury Engineering upon request. Mercury Engineering and/or its designee reserves the right to audit training records and field competencies at any time.
- 1.17 It is recognised in the construction industry that New-to-Site Workers and Young Workers can be a higher risk category than other categories of workers. The Contractor shall develop and implement a programme” to address this risk, which will include as a minimum assigning a “buddy” to all New-to-Site and Young Workers during the first 14 calendar days of their time on Site, who will provide mentoring, coaching and assistance in QEHSS matters.
- 1.18 The Contractor shall ensure that all its supervisors (both direct employees and also sub-contractors) complete the Mercury Engineering SVSM Training within one-month of their mobilisation to Site. Mercury will provide this training on site on a periodic basis.
- 1.19 The Contractor shall ensure that QEHSS matters are effectively communicated to all its employees on Site (examples: Weekly Tool Box Talks, safety posters, safety alerts, etc).

QEHSS Staffing and Coordination

- 1.20 Prior to commencing work, the Contractor shall:
- Identify the Contractor’s senior onsite manager with overall accountability for QEHSS;
 - Employ an onsite qualified full time Safety Professional (approved of in advance by Mercury Engineering Project Management) when actual or expected manpower reaches 20 employees or hazardous activities are predetermined to be present. In the event of the Contractor having less than 20 employees, then the Contractor may nominate one of its managers or senior supervisors to complete this role on a part-time basis; the Contractor shall provide Mercury Engineering with the name of the persons that they have appointed as Site Safety Advisor;
 - Provide an additional qualified Safety professional for each manpower increment of 50 employees; and
 - Provide Mercury Engineering or its designee for approval a plan to provide adequate QEHSS coverage for all work to be completed outside of normal working hours.

All Contractor Safety Professionals must be experienced and qualified in Health & Safety (Diploma in Safety, Health and Welfare at Work or equivalent). Mercury Engineering reserves the right to approve/disapprove any

and all personnel chosen as QEHSS staff on the project based on applicable experiences and willingness to support the Project QEHSS programme. The Contractor shall provide CVs for appropriate personnel if requested. Mercury Engineering reserves the right to implement an integrated QEHSS Team approach with its Contractors.

- 1.21 The Contractor shall send the attendance of their senior onsite manager and its nominated QEHSS representative to all pre-arranged QEHSS meetings and then communicate and implement the outcomes of these meetings to its workforce.
- 1.22 The Contractor shall ensure that QEHSS matters are effectively communicated to all its employees on Site (examples: Weekly Tool Box Talks, safety posters, safety alerts, etc). In particular, this shall include communications on High risk Activities.

Lower tier Contractors

- 1.23 The Contractor shall ensure that all its sub-contractor companies (including multi-tier sub-contractors) are submitted to Mercury Engineering for QEHSS review and approval.
- 1.24 Prior to submittal to Mercury Engineering for review and approval, the Contractor shall ensure that all its sub-contractor companies (including multi-tier sub-contractors) have been approved as part of the Contractor's QEHSS pre-qualification process. In addition, details of any Ireland HAS / UK HSE (or equivalent) notifications of dangerous occurrences, enforcement, prohibition and improvement notices shall be disclosed to the Mercury Engineering Project QEHSS Manager for review.
- 1.25 If a sub-contractor is disallowed for work on Mercury Engineering projects due to a failure to meet the QEHSS expectations and criteria, then the Contractor shall notify Mercury Engineering in writing for documentation on that firm within Mercury Engineering records.
- 1.26 Where business conditions dictate accepting a sub-contractor who does not meet QEHSS expectations, a written corrective action plan must be negotiated between the Contractor and the sub-contractor. Contractor shall submit this plan to Mercury Engineering Project Manager for review and acceptance.

Audits and inspections

- 1.27 The Contractor shall implement a programme of self-assessment, inspection and audit on its work. This shall contain as a minimum:
 - Contractor project management shall participate in the Mercury Engineering Safety Management by Walking Around (SMBWA) Program, which includes QEHSS performance reviews conducted by all project supervision/management a minimum of 1 per week. This programme shall place particular emphasis on High-Risk-Activities (HRAs);
 - Safe Observation reporting: The Contractor will be required to participate in the Safety Observation Card programme. A written copy of this program can be obtained from a Mercury Engineering QEHSS representative upon request.
 - The Contractor shall conduct periodic compliance inspections audits (and any applicable sub-contractors) to ensure core compliance with all applicable laws and defined Mercury Engineering performance requirements;
 - A written report of, findings and follow-up/closure from the inspections and audits shall be retained in written records for Mercury Engineering to review upon request.
- 1.28 The Contractor's operations on site shall be subject to a number of environmental, health and safety (QEHSS) inspections and audits throughout the life of any given contract (both by Mercury Engineering and also 3rd Parties). The Contractor shall fully support and comply with these inspections and audits (both in terms of the schedule of the inspections and provision of Contractor personnel requested by Mercury Engineering).
- 1.29 The Contractor will be informed of any hazards or defects noted during these inspections and audits and shall be expected to take immediate action, including formal written closeout reports. The Contractor's responses and performance shall directly impact on the continuation as a Contractor with Mercury Engineering.

Incident preparedness and response

- 1.30 The Contractor shall provide a project specific Emergency Response Plan, complete with identified roles and responsibilities. The plan must contain:
- Names and contact numbers of Contractor management;
 - Emergency response procedures (spill containment, emergency medical response, etc.) for any potential emergencies that might arise due to construction activities in the Contractor's defined scope of work;
 - Defined communication systems used to ensure efficient communication with affected project personnel, responders and Mercury Engineering as appropriate; and
 - Procedures to ensure that the plan is maintained during and until completion of the Project.
- 1.31 Prior to the commencement of work, the Contractor shall provide a "Medical Coverage Plan" for approval by Mercury Engineering project management. This plan should identify the methods that the Contractor has chosen to provide medical support (from first aid through emergency care) in the event it is needed.
- 1.32 The Contractor shall support and comply with the Project emergency evacuation and medical emergency drill programmes.
- 1.33 The Contractor shall implement an Employee Assistance Programme (EAP) to supports its employees with work related and/or personal problems that may impact their mental health, their job performance and emotional well-being.
- 1.34 The Contractor shall provide Mercury Engineering a Case Management and Return-to-Work Plan, as described below.
- 1.35 The Case Management element of the plan shall ensure:
- Medical support (on or offsite) appropriate for the defined project work hours;
 - Onsite management coverage for accompaniment to clinic/doctor;
 - Physician/Clinic follow up post visit;
 - Restricted work coordination with the aforementioned return to work program; and
 - Investigation and follow up for potentially unsubstantiated claims and injuries.
- 1.36 The Return-To-Work element of the plan shall be designed to return employees safely and efficiently back to their positions following an occupational and/or non-occupational injury or illness.

Incident reporting, incident investigation and QEHSS statistical reports

- 1.37 The Contractor shall ensure that all incidents (first aids, recordable injuries, environmental incidents, dangerous occurrences, near misses, regulatory inspections and/or citations) are reported to Mercury Engineering Project Manager and Project QEHSS within 1 hour.
- 1.38 The Contractor shall submit a preliminary written notification within 24 hours to both Mercury Engineering's Project Manager and also the Mercury Engineering incident reporting function (accidents@mercuryeng.com).
- 1.39 The Contractor shall complete a detailed written report detailing all circumstances leading up to the incident provided within 7 days. This shall include: both identification of all incident causal factors (root and contributing causes); and documentation of all corrective actions and anticipated closure date. Mercury Engineering reserves the right to require Mercury Engineering involvement in any and all Contractor investigations.
- 1.40 The Contractor shall maintain documented incident records for the duration of the project and will make these historical files available to Mercury Engineering QEHSS at project close out.
- 1.41 Mercury Engineering may utilise the Contractor's incident reports (excluding any personal information) in the Mercury Engineering incident communication systems (e.g. Tool-Box-Talks, Safety Bulletins and Alerts, reporting to Client, etc).

- 1.42 The Contractor shall provide a written QEHSS statistical report each week and this shall contain:
- The Contractor Headcount and Person Hour Report (including sub-contractors), separated between Administrative and Field;
 - Details and number of all incidents (first aids, recordable injuries, environmental incidents, dangerous occurrences, near misses, regulatory inspections and/or citations; and
 - Leading indicator summary, including numbers of: SMBWA inspections; Safety Observation Reports; Safe Plan of Action; and Good Catches/Near Misses.

QEHSS performance management

- 1.43 Mercury Engineering operates a Non-Conformance-Reporting (NCR) system which is effective at all times. Personnel not in compliance with specific rules, policies, procedures and method statements, operating unsafely, unsafe act, condition, positions may be subject to NCR issue. NCRs are recorded on the Contractor supply chain records and are considered during re-application.
- 1.44 Mercury Engineering implement a disciplinary code on its sites, which allows for warnings to be issued and recorded. Mercury Engineering reserves the right to suspend or permanently remove the Project access privileges of both the Contractor and also Contractor personnel in the event of significant breaches of QEHSS requirements.
- 1.45 A Drug and Alcohol Policy is in effect on all Mercury Engineering sites. Contractor shall comply with this policy. Any persons found under the influence of drugs and/or alcohol may have their Project access privileges suspended. On some projects in which Mercury Engineering is employed, our Clients operate mandatory random screening programme and results are communicated to the individual and the Contractor. The individual and/or the Contractor may have their Project Site access privileges suspended or removed, depending on the results.

General QEHSS arrangements

- 1.46 Access and egress to the secure site will be controlled and monitored by photographic badges and/or hand swipe biometric systems. Materials entering and being removed from site must be approved and inspected by Mercury Engineering project management.
- 1.47 The Contractor shall ensure that all its direct employees and sub-contractors comply with a five-point PPE plan, including: safety helmets, eye protection, hi-visibility clothing with either Mercury or Contractor name/logo, level 3 cut resistant gloves / hand protection and safety footwear. Any other PPE requirement as defined by the QEHSS Plan and Risk Assessment / Method Statement must be complied with; these may include face protection, specific clothing, hearing protection, fall arrest/restraint equipment, etc. The contractor provides, inspects and maintains all Personal Protective Equipment (PPE) for its employees free of charge.
- 1.48 The Contractor shall ensure the work area is kept free of housekeeping hazards at all times by following the Mercury Engineering “Nothing on the Ground” policy and also a “Clean As You Go” programme. Possible hazards presented by material storage, work in progress, etc. shall be appropriately barricaded to prevent potential incident or injury. Non-barricaded general construction areas, no matter the working surface condition, shall be kept free of potential hazards at all times.
- 1.49 The Contractor shall ensure that housekeeping standards are maintained at all times and particularly asked to note that workplaces must be kept tidy and that all debris, waste materials, etc., are cleared as work proceeds, and correct segregation is used, where applicable. If the Contractor fails to maintain its work area in a clean/safe condition, Mercury Engineering reserves the right to facilitate the cleaning of the work area and back charge the Contractor for the associated clean-up cost.
- 1.50 Suitable welfare facilities and first aid equipment shall be provided by the Contractors for their employees in accordance with law and regulation requirements, unless arrangements have been made for the Contractors to have the use of Mercury Engineering’s or Clients’ facilities. These shall include as a minimum:
- Conveniently located, clean rest rooms; hand wash facilities and drying facilities for work overalls;

- Adequate lunch and break quarters providing shelter from the heat/cold and isolated from construction areas to allow lunches and/or breaks without the need for Personal Protection Equipment (PPE);
- Hazard Communication locations set up and available to personnel; and
- Sufficient drinking water facilities.

- 1.51 All plant or equipment brought onto site by Contractors shall comply with statutory guidelines, be CE marked safe and in good working condition, fitted with any necessary guards and safety devices and with any necessary certification available for checking. Information and assessment on noise levels of plant, equipment or operations to be carried out by the Contractor shall be provided to Mercury Engineering's site representative before work commences. The contractor will keep written records of inspection & issue to Mercury upon request.
- 1.52 Contractor shall not bring power tools or electrical equipment of greater voltage than 110 volts onto site. All transformers, generators, extension leads, plugs and sockets shall be to latest standards for industrial use, in good condition and comply with all relevant laws and regulations. Where applicable, a certificate must be available for portable appliances that are required to be tested under the relevant national electricity at work laws and regulations. The contractor will keep written records of inspection & issue to Mercury upon request.
- 1.53 The Contractor shall implement a programme of daily and weekly inspection of lifting equipment and work at height equipment in compliance with all relevant laws and regulations. This daily and weekly inspection programme shall comply as minimum with the Irish HSA programme (i.e. GA1, GA2 and GA3 inspection protocols). The contractor will keep written records of inspection & issue to Mercury upon request.
- 1.54 The Contractor shall take all necessary measures to minimise work at height and then follow the hierarchy of controls (i.e. order of precedence: 1. Permanent platforms; 2. Certified scaffolds / Motorised Elevated Work Platforms; 3. Podium ladders; and 4. A-frame ladders).
- 1.55 Contractor shall ensure that all scaffolding/access equipment/work at height equipment used by Contractor is inspected by the Contractor appointed competent person to ensure that it is erected and maintained in accordance with all relevant laws, regulations and codes of practice (even when scaffold erected for other Contractors). The Contractor shall implement a programme of scaffold tag inspections (both handover inspections and also subsequent 7-day inspections). The contractor will keep written records of inspection & issue to Mercury upon request.
- 1.56 The Contractor shall ensure that all its direct employees and sub-contractors are not permitted to alter any scaffold provided for their use or interfere with any plant or equipment on the site unless authorised.
- 1.57 The Contractor shall demonstrate by calculation that all Temporary Works/Structures are capable of performing the duty required. The Contractor shall provide design information to Mercury Engineering by in a timely manner to allow review and acceptance.
- 1.58 The Contractors engaged in Lifting Operations shall demonstrate compliance with all relevant laws and regulations to Mercury Engineering. This shall include competence of rigging operatives, crane operators, lifting supervisors, etc.
- 1.59 The Contractor shall comply with the fire prevention measures listed in the Mercury Engineering Site QEHSS Plan.
- 1.60 The Contractor shall ensure that its employees comply with all safety signs erected on the Project at all times.

Environmental and Hazardous Materials Management

- 1.61 The Contractor shall comply with all with all relevant laws and regulations with respect to noise limits at the boundary of site and any associated working hours limitations.
- 1.62 The Contractor shall ensure compliance with all relevant laws and regulations with respect to segregation / disposal of their waste.

- 1.63 The Contractor shall not discharge/pump any liquid effluent, ground water or surface water offsite without the written approval of Mercury Engineering and in full compliance with all relevant laws and regulations. The Contractor shall minimise the potential for soil and ground water contamination via the use of bunds around chemical/fuel storage and drip trays under stationary equipment.
- 1.64 Prior to commencement of work, the Contractor shall document in the RAMS and submit to Mercury Engineering for review and approval all hazardous materials required to complete the requested scope of work.
- 1.65 The Contractor agrees to limit its inventory of Hazardous Materials on the Project site to not exceed one weeks' supply unless specifically authorized in writing by Mercury Engineering QEHSS department. Any material or substance brought on site which has health, environmental, fire or explosion risks shall be stored and used in accordance with all relevant laws and regulations and its Material Safety Data Sheet (MSDS). This information shall be provided to any other person who may be affected on site.

12.0 Appendix 3 – Environmental, Social & Governance (ESG) Terms, Conditions and Responsibilities for Agency Personnel / Consultants & Contractors

1. Construction Environmental Management Plan available from the contractor with reference to the scope of work package and any additional contractual requirements from Mercury.
2. Mercury Engineering recommends that the Contractor has an Environmental Management System in place, i.e. ISO 14001.
3. The Contractor shall comply with all with all relevant laws and regulations with respect to noise, dust, vibration limits at the boundary of site and any associated working hours limitations.
4. The Contractor shall ensure compliance with all relevant laws and regulations with respect to segregation / disposal of their waste accompanied with regulatory Waste documentation.
5. The Contractor shall not discharge/pump any liquid effluent, ground water or surface water offsite without the written approval of Mercury Engineering and in full compliance with all relevant laws and regulations.
6. The contractor shall participate and assist in achieving any certifications or building standards expected by the client including LEED/BREEAM/EC3.
7. The Contractor shall minimise the potential for soil and ground water contamination via the use of bunds around chemical/fuel storage and drip trays under stationary equipment, etc.
8. Prior to commencement of work, the Contractor shall document in the RAMS and submit to Mercury Engineering for review and approval all hazardous materials required to complete the requested scope of work.
9. The Contractor shall limit its inventory of Hazardous Materials on the Project site to not exceed one weeks' supply unless specifically authorised in writing by Mercury Engineering QEHSS department.
10. The Contractor shall ensure any material or substance brought on site which has health, environmental, fire or explosion risks shall be stored and used in accordance with all relevant laws and regulations and its Material Safety Data Sheet (MSDS).

11. The Contractor shall ensure that they have a register in place for all materials or substances hazardous to health (COSHH) brought on site. The Contractor shall complete a COSHH assessment in conjunction with the MSDS.
12. The contractor shall ensure any environment or sustainability data requested by mercury is available for upload on our internal compliance tracker.
13. Assist and support any ESG disclosures relating to our third-party platform for ratings such as Ecovadis, CDP, Sedex, and SBTI.
14. Collaboration with supply chains to reduce the embodied carbon emissions of work activities, sustainable procurement of goods and minimise negative environmental impacts.

13.0 Appendix 4 – Quality Terms, Conditions and Responsibilities for Agency Personnel / Consultants & Contractors

General Requirements on Quality Management

1. Mercury Engineering recommends that the Contractor has a Quality Management System in place, i.e. ISO 9001.
2. The Subcontractor is required to fully engage and take an active role in maintaining quality levels on site to achieve a snag free installation and comply with Mercury's "Right First Time Culture".
3. The Subcontractor is responsible for their installation, commissioning, and handover to Mercury as per project schedule dates.
4. The Subcontractor shall be fully responsible for the control of the quality of Work, as such Subcontractor will mobilize an adequate QA/QC personnel to site and will provide all means to ensure that all activities required in Quality Plans, ITP's, applicable codes, specifications, IFC drawings and local regulations are fulfilled and duly documented.
5. "The Subcontractor will ensure that all his installed equipment is fully protected against damage on site until handover. Protection of the works both its stored condition and the installed condition is the responsibility of the subcontractor. Mercury will not accept any damage claims because of damage to the installation prior to official handover. "

Subcontractor Quality Management

1. The Subcontractor shall prepare and submit for approval, project Quality Procedures covering all operations in the Subcontractor work scope. Procedures shall be prepared in advance of works taking place."
2. The subcontractor shall prepare and submit a Project Quality Plan to Mercury through the Common Data Environment BIM360 for approval.
3. The Subcontractor shall submit its Quality Management Plan to Mercury no later than 10 working days before the Subcontract works start on site.

Quality Induction and Quality Kick-off Meeting

1. Quality induction will be provided to subcontractor prior to start of any activities on the project this will be to all Engineers, foremen, and supervisors. Any new staff joining in a later stage is obliged to attend the quality

induction.

2. A quality kick off meeting shall be conducted upon acceptance of a contract where document deliverables and activities leading up to the start on site shall be discussed.
3. Readiness review checklist will be submitted to the subcontractor prior to the kick off meeting the readiness review checklist needs to be available by the subcontractor at the kick off meeting.

Inspection and Test Plan (ITP)

1. The Subcontractor shall prepare and submit for approval, Inspection, and test Plan (ITP) covering all operations in the Subcontractor scope of works.
2. ITP should be prepared in line with project requirements specifications applicable standards and country regulations.
3. ITP shall be prepared and submitted to Mercury through Contractor's CDE for review and approval. Subcontractor shall submit its ITP to the Contractor no later than 10 working days before the Subcontract works start on site.

Calibrated Equipment

1. All measuring equipment and testing tools used to perform the scope of work, needs to be certified and calibrated, the subcontractor if part of their scope of works must provide evidence to Mercury that testing equipment is calibrated.
2. All equipment used for testing needs to be in good working condition and stored correctly as per manufactures requirements, all equipment needs be logged in a calibration log so the equipment can be tracked while the instrument is on a project.

The below is a non-exhaustive list of equipment that needs calibration:

- Pressure gauges
- Cat scanner
- Pressure test valves
- Concrete testing equipment

Benchmarks / Mock-up / First of a Kind

1. Before execution of any activity subcontractor shall provide Samplings, mock-up to a designated area on-site that will be inspected by Mercury/Client. Subcontractors are required to produce a quality benchmark for their installations which will be reviewed and audited against.
2. Benchmark will be prepared by subcontractor using benchmark template which will be submitted for inspection through the Contractor's CDE and attached in benchmark checklist.
3. Invitation for Inspection requests need to be submitted through the Contractor's CDE in advance of the activity starting. Upon inspection and approval by Mercury team, execution of the activity may start.

Site Inspections and Testing

1. The Subcontractor will ensure that the systems & areas are fully walked down, snag lists generated and closed, and quality inspection check sheets completed before offering a snag free installation to Mercury for inspection.
2. Once section of work has been completed, as per the indicated frequency in ITP, Inspection should be offered to Mercury for inspection. Invitation should be sent to Mercury 1 working day in advance through email.

3. Weekly and 3 weeks look ahead schedule, of the inspection and testing, should be prepared by subcontractor and submitted to Mercury through the Contractor's CDE.

All documented evidence of testing requirements under the subcontractor scope of works must be in place to include but not limited to:

- Test packs.
- P&ID/Schematic showing test limits.
- Line List (Showing Test Pressure).
- Gauge Certificate of Calibration.
- Pressure Test Certificate.
- Flushing Certificate.

Non-Conformance Reports (NCR)

1. If a non-conformance to the project requirements in the Subcontract works is identified, an NCR shall be raised to Subcontractor.
2. The Subcontractor is required to provide Correction, Root cause analysis and Corrective action to the NCR raised and close out the NCR within the time frame set by Mercury. Upon the approval by the Contractor, Subcontractor shall proceed with the implementation of corrective action. Upon implementation of corrective action, inspection will be conducted by the Contractor's QA/QC representative, and the NCR will be closed out when a satisfactory result is demonstrated.

Snagging & Inspection of Works

1. The subcontractor must comply to the walkdown, and snagging procedures as set out by Mercury on the project. Incremental walks shall be carried out daily to capture snags from occurring on the project. The Subcontractor will inspect 100% of the installation as set out under their work scope."
2. The Subcontractors is required to use the Contractor's CDE and must provide IPADs at their own cost to manage the Contractor's CDE tool interface on the site. Subcontractor shall rectify and close all issues and snags raised on site within 7 working days.

Training

1. The subcontractor must ensure the operatives working under their control are competent and have appropriate education, training, or experience requirements for the work they are performing. Training certificates and matrix shall be available upon request by Mercury.
2. The subcontractor must complete appropriate training as set out by Mercury through the applicable learning management system.

Site Meetings Quality Toolbox Talks

1. The Subcontractors will be required to attend all project Quality Meetings on site. Quality meetings will be organised by Mercury site team and invitation will be sent to the Subcontractor.
2. Minutes of meetings and list of attendees will be maintained for each meeting, where closeout dates will be agreed by both parties.

3. Quality whiteboard meeting is to be held daily at a strategic location on site the subcontractor must attend quality whiteboards as per project requirements. Mercury will conduct quality toolbox talks on projects all subcontractors must attend as request by Mercury.

Quality Audits

1. Mercury will assign an Auditor to perform an audit on the Subcontractor quality management system to verify if project requirements have been fulfilled.

Material Traceability

1. Any material as part of the subcontractor scope of works must comply with local regulations and standards applicable certificates must be present as proof of origin upon request by Mercury e.g., CE marking, and rebar mill certs, declaration of performance.

Material Storage & Protection

1. Protection of the works both its stored condition and the installed condition is the responsibility of the subcontractor. All materials or components need to be stored in compliance with the manufacture's suppliers' instructions. All damaged or defective materials need to be quarantined and, removed from the site immediately.

Technical Submittals

1. Technical Information for any material proposed for the works shall be submitted to the Contractor at latest 4 weeks prior to the required order date for the material. The Contractor will review compliance with specifications and approve or reject the material 2 weeks after a complete technical submission is received.

Failure to Comply with Quality Requirements

1. Failure to comply with the requirements in the Project Specific Quality Plan and in any other quality requirement in the contract documents will be considered as a failure to deliver the works in the scope and will as such affect progress payments of the Subcontract works.
2. The contractor reserves the right to rectify non-compliances with the project requirements with a third party should the Subcontractor fail to address the non-compliances in a timely manner. Any costs incurred by the contractor will be charged to the Subcontractor.

14.0 Appendix 5 - Contractor Request for QEHSS Deviation

Request for deviation from: QEHSS Terms, Conditions and Responsibilities (Sub-contractor / Agency Personnel / Consultant)		
Number	Item	Description
1	Project name	

2	Mercury sector	
3	Name of sub-Contractor / Agency / Consultant	
4	Description of activities intended for the Contract	
5	QEHSS Clause number	
6	Current words of Clause	
7	Proposed replacement words for Clause	
8	Reason for the requested deviation from the Minimum QEHSS Requirement	
Proposed by Contracts Manager / Project Manager		<i>Name</i> <i>Signature</i> <i>Date</i>
Reviewed by Sector QEHS Lead		<i>Name</i> <i>Signature</i> <i>Date</i>
Approved by Group QEHSS Director (Mick O'Connor)		<i>Name</i> <i>Signature</i> <i>Date</i>

15.0 Appendix 6 - Contractor Pre-mobilisation Readiness Check sheet

Project name		Sector	
Contractor Name		Estimated number of people on Site at peak	
Package Lead		Scope of work	
Date required on site			

No.	Item	Yes/No	Details / Comments
1	Confirm that Contractor has been formally QEHSS assessed (and approved by Mercury Sandford Procurement Department)?		Refer to Mercury Procurement SharePoint: https://mercury1.sharepoint.com/sites/share/SubcontractorDirectory/SitePages/Home.aspx
2	Confirm that Contract contains the <i>Contractor Minimum QEHSS Requirements</i> (refer to Appendix 2 of this procedure for detail)		<i>Note: If there are any approved deviations, then attach to this document</i>
3	Has the Project-specific QEHSS Plan been formally issued to Contractor (and Contractor Site Representative a copy on Site)		
4	Confirm that Contractor has formally nominated their Site Representative?		<i>Note: Provide name of Contractor Site Representative</i>
5	Confirm that a formal KickOff meeting has taken place on site		<i>Note: Attended by Contractor Site Representative, Mercury Package Manager, Mercury Site QEHSS Lead</i>
6	Confirm that Contractor commits to mandatory attendance at Weekly Site QEHSS Meeting		
7	Confirm Contractor has a process in place to complete Mercury online Induction (minimum 24 hours in advance of workers coming to Site)		
8	Confirm Contractor has QEHSS Plan and/or RAMS (for minimum next 4 weeks) formally submitted and approved by Mercury QEHSS and Package Lead		
9	Any other items/issues		

Mercury Package Lead signature		Date	
Mercury Site EHS Lead signature		Date	
Contractor Site Representative signature		Date	

16.0 Appendix 7 - Contractor Inspection/Audit Check sheet

This template is included for example purposes only.

- Please refer to Autodesk BIM360 database for the most up-to-date revision.



Sub-contractor EHS
audit rev00 May2019

17.0 Appendix 6 - Contractor Consequence Management / Disciplinary Process

Mercury Engineering will operate a disciplinary code on all sites. The code allows for warnings to be issued and recorded.

Operatives, supervisors or managers who receive a third warning, or one warning for gross misconduct, will have their Site Access Privileges removed.

Where warnings are issued the Contractor will be required to reply in writing that action has been taken to prevent recurrence of the breach. The following procedures will apply to any breaches of health and safety requirements on all Mercury Engineering establishments.

The precise detail of how the procedures are implemented and who is authorized to issue formal warnings is at the discretion of the Mercury Engineering Project, or Establishment, Manager. Such authorized personnel will be identified in advance and have their responsibility confirmed in writing by the Mercury Engineering Project, or Establishment, Manager.

First Warning:

Any unsafe behavior or condition should be discussed with the individual concerned and a warning will be issued, indicating the improvements required. This warning will be in place for a period of one month from the date of the offence. After that time the warning will expire and no longer form part of an individual's work record.

Examples of infringements at this level are:

- Failure to use correct P.P.E;
- Knowingly working on unsafe platforms, i.e. tower scaffolds, step ladders, trestles etc.;
- Knowingly working without current permit, i.e. hot work, excavation, electrical systems, commissioning etc.;
- Unsafe methods of slinging;
- Operating plant, equipment and transport without authority;

- Unauthorized alteration of working platforms;
- Failure to use defined access routes; and
- Failure to use access equipment provided; e.g. scaffolding, towers, ladders and harnesses.

Second Warning:

Should the first warning go unheeded, or the individual commits a second offence, within one month, a second warning will be given. This should result in the individual being suspended from work for the rest of that day.

Examples of the infringements at this level are:

- All the examples listed under the First Warning, but seen for a second time in one month;
- Failure to observe an instruction on safety issues, whether by signage or given verbally; and
- Failure to comply with agreed methods of safe working e.g. risk assessments, method statements, task sheets etc.

Exclusion from Site / Establishment (Red Card):

Any individual committing gross misconduct relating to safety issues, or a further subsequent offence by an individual who has already received a warning, will result in the individual being permanently removed from the establishment.

The exclusion from site is the most serious action that can be taken and as such will require the individual to be suspended from work while a full inquiry into events are held by the company. Examples of the infringements at this level are:

- Premeditated breach of safety rules where there is a perceived risk to life;
- Unauthorized removal of safety devices (e.g. limit switches, interlocks, guard rails etc.) where, in the opinion of the Manager, there was immediate risk to life;
- Deliberately exposing the public to danger by not complying with agreed safe methods of work;
- Deliberately not complying with the instructions in method statements, risk assessments or task sheets; and
- For any situations referred to above, a Mercury Engineering "Health and Safety Discipline Notice" will be issued, and acted upon.

Supervisors

Supervisors have a primary responsibility for the effective management and control of health and safety on our sites. Those supervisors will also be subject to the above disciplinary procedures in the event of:

- Putting people to work in unsafe conditions;
- Failure to take the relevant health and safety precautions;
- Failure to apply and enforce the controls (in whole or in part) identified in the Site Rules, safety signage or method statements,

Monitoring System

Projects will hold a central record of all warnings issued on that project such that Mercury Engineering Managers can refer to any previous history of safety breaches.

Performance levels will be recorded in the minutes of the weekly contractor progress / safety meetings, and within the quarterly feedback by Projects of contractor performance.

In the event of a Contractor employee having his Site Access privileges removed from a Mercury Project Site, this loss of access privileges is automatically applied to all Mercury Sites. The only exception this is when Sub-contractor submits a written improvement plan, which is reviewed and accepted in writing by both Sector Operations Director and also the Mercury Group QEHSS Director.