USE OF CORPORATE AUDITORS

Effective Date: March 28, 2022
Owned by: Manager,
Safety Audits and Certifications

Approval: Juliet Hood
Approved By: Manager,
Safety Audits and Certifications

Valid Until: March 28, 2025

Sensitivity Level: Public

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SUMMARY OF CHANGES

This Summary shows:

- All changes from last approved and published document
- The location within the document where the changes have been made

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Author(s)</th>
<th>Revision Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>February 1, 2019</td>
<td>Melissa Mass</td>
<td>This is the first revision of the Use of Corporate Auditors Procedure. This revision brings the Procedure template into alignment with the templates used by the Governing Documents Framework.</td>
</tr>
<tr>
<td>1.1</td>
<td>April 24, 2019</td>
<td>Melissa Mass</td>
<td>Revised to reflect the changes AB Partnerships made to Policy 1.6 Partnerships Audit Standard Equivalency (PASE) and the elimination of Policy 6.6 Use of Corporate Auditors to Conduct Regular Certification Audits.</td>
</tr>
<tr>
<td>1.2</td>
<td>March 31, 2022</td>
<td>Carol Hockley</td>
<td>Annual Review</td>
</tr>
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⚠️ Requirements changed in the new revision will be identified with a revision triangle beside it.

SUMMARY OF REVIEWERS

The following people were involved in the review of this Procedure.

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
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<tbody>
<tr>
<td>Juliet Goodwin</td>
<td>Manager, Safety Audits and Certifications</td>
</tr>
<tr>
<td>SA&amp;C Team</td>
<td>Subject Matter Experts (SME)</td>
</tr>
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1.0 ABOUT THIS PROCEDURE

1.1 Purpose and Direction
This procedure defines the process for large employers with a complex organization and a well-developed, internal corporate auditing system to use their internal corporate auditors to complete a certification/recertification or maintenance audits. For certification/recertification audits they must demonstrate their independence from the operations they are auditing.

1.2 Scope
For internal corporate auditors to be considered for certification audits, they must remain independent of the management for the departments or sites they are auditing. Furthermore, they cannot carry responsibility for the health and safety performance of those operations.

The use of internal corporate auditors for any employer is subject to approval by both Energy Safety Canada and the appropriate governing bodies as required.

1.3 Target Audience
The target audience for this document is all Energy Safety Canada personnel in any work location. This includes Employers, Auditors and applicable governing bodies.

2.0 PROCEDURE

2.1 To be eligible for the use of corporate auditors for certification/recertification or maintenance audits, employers must:

2.1.1 Have over 400 employees and multiple work sites.

2.1.2 Apply to Energy Safety Canada (and any required governing bodies via Energy Safety Canada) for approval.

2.1.3 Use the Energy Safety Canada audit protocol or have their audit protocol approved by Energy Safety Canada and, the appropriate governing body, as required.

2.1.4 Have their corporate auditors certified by Energy Safety Canada or have their existing auditor credentials approved by Energy Safety Canada and the appropriate governing body as required.

2.2 To be eligible for the use of corporate auditors for certification/recertification audits, employers must:

2.2.1 Demonstrate the independence of the corporate auditor(s) from the operation or work site being audited. To fulfill this criterion:

- Auditors must not report to the management of the operation, work site, or facility they are auditing

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Auditors must not be involved in the development and implementation of the health and safety management system at the operation, work site, or facility they are auditing.

Auditors must not be held accountable for the effectiveness of the health and safety management system of the operation they are auditing.

In the event of a team audit, all members of the team must meet this standard of independence.

2.3 Employers who wish to use corporate auditors for their certification or maintenance audits must submit the Application for an Employer to use Corporate Auditors (SAC-CFT-021) and supporting documentation for review. This application must include:

2.3.1 Complete details of the employer’s corporate auditor training program (if the auditor is not a certified Energy Safety Canada auditor).

2.3.2 A description of how corporate auditors are certified or qualified by the employer to conduct audits (if the auditor is not a certified Energy Safety Canada auditor).

2.3.3 Details of the process used to maintain corporate auditor certification or qualification (if the auditor is not a certified Energy Safety Canada auditor).

2.3.4 The proposed list of auditors, their qualifications, their Energy Safety Canada’s auditor certification numbers (if applicable), and their health and safety roles/responsibilities and reporting unit/work group within the organization.

2.3.5 Organizational information, including:

- Organizational structure
- Reporting relationships between various operations, work sites, or facilities and between these and corporate auditing

2.4 Energy Safety Canada, in consultation with relevant governing bodies (if applicable), shall approve or reject corporate auditors for certification/recertification audits based on the application provided by the employer.

2.5 Energy Safety Canada shall maintain a copy of the employer’s application and supporting documentation until the next certification audit or until the COR certification expires.

2.6 The employer must seek re-approval for each subsequent audit.
3.0 ROLES & RESPONSIBILITIES FOR PROCEDURE

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
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| Employer              | - Applies to Energy Safety Canada to use internal corporate auditors in advance of registering their certification/recertification or maintenance audit  
                        | - Provides the necessary documentation along with a completed application that demonstrates the independence of their corporate auditors for the proposed certification audit and full compliance with the above policy standards |
| Energy Safety Canada  | - Reviews the application and supporting documentation to ensure compliance with the above policy standards                                            
                        | - If required, Energy Safety Canada forwards approved applications and all supporting documentation to the relevant governing body for approval       
                        | - Energy Safety Canada communicates its decision, or the decision reached in consultation with the relevant governing body, to the employer         
                        | - If approved, Energy Safety Canada maintains a copy of the employer’s application and supporting documentation until the employer’s next audit or the COR certification expires |