Imperial remains steadfast in its commitment to excellence in safety, security, health and environmental (SSH&E) performance, referred to collectively as operations integrity.

We recognize that while we play a vital role in providing the energy the world relies on, many of our operations and products present potential risks to people and to the environment.

Clearly identifying these risks is intrinsic in our business, and we believe the best way to meet our commitment to excellence in SSH&E performance is through a capable, committed workforce, as well as practices designed to enable safe, secure and environmentally responsible operations. We accomplish this through clearly defined policies and practices, and with rigorously applied management systems designed to deliver results.

The Operations Integrity Management System (OIMS) represents the foundation of our commitment to managing SSH&E risk and achieving excellence in performance. Since the inception of OIMS in 1992, our SSH&E performance has improved substantially. Imperial’s safety performance is among the best in Canadian industry, and we have been cited by Lloyd’s Register Quality Assurance for “being among the leaders in the extent to which environmental management considerations have been integrated into our ongoing business practices.”

All operating organizations are required to maintain the systems and practices needed to conform to the expectations described in the OIMS framework. This common framework for all of Imperial encourages the sharing of best practices and assists us as an organization in meeting our SSH&E objectives.

To drive continuous improvement, the framework is periodically updated. This revision strengthens framework expectations with respect to leadership, process safety, environmental performance, and the assessment of OIMS effectiveness and is intended to:

- Reinforce our belief that all safety, health and environmental incidents are preventable.
- Promote and maintain a work environment in which each of us accepts personal responsibility for our own safety and that of our colleagues, and in which everyone actively intervenes to ensure the safety, security and wellness of others.

We believe these enhancements will help drive Imperial ever closer to our vision of a workplace where nobody gets hurt, where security is everybody’s business, and where our environmental performance meets our expectations to Protect tomorrow. Today.

Rich Kruger
Chairman, president and chief executive officer
Imperial is committed to conducting business in a manner that is compatible with the environmental and economic needs of the communities in which we operate, and that protects the safety, security, and health of our employees, those involved with our operations, our customers, and the public. These commitments are documented in our safety, security, health, environmental, and product safety policies. These policies are put into practice through a disciplined management framework called the Operations Integrity Management System (OIMS).

Imperial’s OIMS framework establishes common expectations for addressing risks inherent in our business. The term operations integrity (OI) is used by Imperial to address all aspects of its business that can impact personnel and process safety, security, health, and environmental performance.
The OIMS framework includes 11 elements. Each element contains an underlying principle and a set of expectations. The OIMS framework also includes the characteristics of, and processes for, evaluating and implementing OI management systems.

Application of the OIMS framework is required across all of Imperial, with particular emphasis on design, construction and operations. Management is responsible for ensuring that management systems satisfying the framework are in place. The scope, priority and pace of management system implementation should be consistent with the risks associated with the business.

OIMS 11 elements

1. Management leadership, commitment and accountability
2. Risk assessment and management
3. Facilities design and construction
4. Information/documentation
5. Personnel and training
6. Operations and maintenance
7. Management of change
8. Third-party services
9. Incident investigation and analysis
10. Community awareness and emergency preparedness
11. Operations integrity assessment and improvement
Element 1: management leadership, commitment and accountability

Management establishes policy, provides perspective, sets expectations and provides the resources for successful operations. Assurance of operations integrity requires management leadership and commitment visible to the organization, and accountability at all levels.

1.1 Systems for operations integrity management are established, communicated and supported at every level in the organization.

1.2 Managers and supervisors credibly demonstrate commitment and personal accountability for operations integrity, promote an open and trusting environment, and understand how their behaviours impact others. Commitment is demonstrated through active and visible participation.

1.3 Manager and supervisor knowledge and skills, including leadership skills and behaviours, are developed to effectively apply operations integrity management tools and systems.

1.4 Management establishes the scope, priority and pace for system implementation and improvement, considering the complexity and risks involved with their operations and products.

1.5 Roles, responsibilities, authorities and accountabilities within the systems are known and exercised.

1.6 Clear goals and objectives are established for the systems, and performance is evaluated against these goals and objectives.

1.7 Expectations are translated into procedures and practices.

1.8 The workforce is actively engaged in the operations integrity process, and relevant learnings are shared across the organization.

1.9 Performance is evaluated, and the degree to which expectations are met is assessed. The results are stewarded to corporate management.

1.10 Managers responsible for businesses operated by others (OBO) communicate OIMS principles to the operator and encourage the adoption of OIMS or similar systems.

Element 2: risk assessment and management

Comprehensive risk assessments can reduce safety, health, environmental and security risks and mitigate the consequences of incidents by providing essential information for decision-making.

2.1 Risk is managed by identifying hazards, assessing consequences and probabilities, and evaluating and implementing prevention and mitigation measures.

2.2 Risk assessments are conducted for ongoing operations, for projects and for products in order to identify and address potential hazards to personnel, facilities, the public and the environment.

2.3 Periodic risk assessments are performed by qualified personnel, including expertise from outside the immediate unit, as appropriate.

2.4 Risk assessments are updated at specified intervals and as changes occur.

2.5 Assessed risks are addressed by specified levels of management appropriate to the nature and magnitude of the risk, and decisions are clearly documented.

2.6 A follow-up process is in place to ensure that risk management decisions are implemented.
Element 3: facilities design and construction

Inherent safety and security can be enhanced, and risk to health and the environment minimized, by using sound standards, procedures and management systems for facility design, construction and startup activities.

3.1 Project management procedures are documented, well understood and executed by qualified personnel.

3.2 Criteria are established and procedures are in place for conducting and documenting risk assessments at specific project stages to ensure that operations integrity objectives are met.

3.3 The design and construction of new or modified facilities use approved design practices and standards that:

- Meet or exceed applicable regulatory requirements.
- Embody responsible requirements where regulations are not adequately protective.
- Address other important operations integrity considerations, including environmental aspects and human factors.

3.4 Deviation from approved design practices and standards, or from the approved design, is permitted only after review and approval by the designated authority, and after the rationale for the decision is documented.

3.5 A process is in place for evaluating the application of new or updated standards with operations integrity implications for existing facilities.

3.6 Quality-assurance processes are in place, which ensure that facilities and materials received meet design specifications and that construction is in accordance with the applicable standards.

3.7 A pre-startup review is performed and documented to confirm that:

- Construction is in accordance with specifications.
- Operations integrity measures are in place.
- Emergency, operations and maintenance procedures are in place and adequate.
- Risk-management recommendations have been addressed and required actions taken.
- Training of personnel has been accomplished.
- Regulatory and permit requirements are met.
Element 4: information/documentation

Accurate information on the configuration and capabilities of processes and facilities, properties of products and materials handled, potential operations integrity hazards, and regulatory requirements is essential to assess and manage risk.

4.1 Drawings, pertinent records, and documentation necessary for sound design, operation, inspection, and maintenance of facilities are identified, accessible, accurate and appropriately safeguarded.

4.2 Information on the potential hazards of materials involved in operations is kept current and accessible.

4.3 Information on potential hazards associated with products, and guidance to enable proper handling, use and disposal, are documented and communicated.

4.4 Information on applicable laws and regulations, licenses, permits, codes, standards and practices is documented and kept current.

Element 5: personnel and training

Control of operations depends upon people. Achieving operations integrity requires the appropriate screening, careful selection and placement, ongoing assessment and proper training of employees, and the implementation of appropriate operations integrity programs.

5.1 A process is in place for screening, selection, placement and ongoing assessment of the qualifications and abilities of employees to meet specified job requirements.

5.2 Criteria are in place to ensure that necessary levels of individual and collective experience and knowledge are maintained and are carefully considered when personnel changes are made.

5.3 Initial, ongoing and periodic refresher training is provided to meet job and legal requirements and to ensure understanding of the proper protective measures to mitigate potential operations integrity hazards. This training includes:

- Assessment of employee knowledge and skills relative to requirements.
- Training documentation.
- Assessment of training effectiveness.

5.4 The assessment and documentation of, and feedback on, employee performance address operations integrity elements.

5.5 Behaviour-based processes for reducing risks of incidents, including personnel safety, process safety, security, and environmental considerations, are in place. It is expected that:

- Employees and contractors consistently recognize and proactively mitigate operational, procedural, and physical hazards.
- Employees and contractors proactively and routinely identify and eliminate their at-risk behaviors and those of their co-workers.
- Human factors, workforce engagement, and leadership behaviors are addressed.
- Behaviours, at-risk conditions, and other precursors that can lead to incidents are recorded, analyzed, and addressed.

5.6 A process is in place to identify and evaluate health risks related to operations that potentially affect employees, contractors, or the public. Based upon assessed risk:

- Exposures are monitored.
- Proper protective and preventive measures are implemented.
- Early detection and diagnosis are provided.
- Pertinent health data is recorded and reviewed.
- Medical fitness for work is determined, as appropriate.
Element 6: operations and maintenance

Operation of facilities within established parameters and according to regulations is essential. Doing so requires effective procedures, structured inspection and maintenance programs, reliable operations integrity critical equipment, and qualified personnel who consistently execute these procedures and practices.

6.1 Operating, maintenance, and inspection procedures are developed, implemented, and consistently used. These procedures include, where appropriate:

- Special procedures for activities with potentially higher risk.
- Operating envelope considerations.
- Regulatory and environmental aspects considerations.
- Human factors considerations.

Procedures are updated at specified intervals and when changes are made.

6.2 A work permit process incorporates checks and authorizations that are consistent with mechanical and operational risks.

6.3 Critical equipment is identified and tested, and it undergoes preventive maintenance.

6.4 The temporary disarming, deactivation, or unavailability of critical equipment is managed.

6.5 Mechanical integrity programs are in place and stewarded to assure the testing, inspection, and maintenance of equipment.

6.6 Interfaces between operations are assessed, and procedures are in place to manage identified risks.

6.7 Environmental aspects are addressed and controlled, consistent with policy, regulatory requirements and business plans. Environmental business planning is conducted and integrated into business plans.

6.8 Environmental performance, including emissions, discharges, and wastes, is tracked and stewarded to meet performance goals.

6.9 Applicable laws, regulations, permits and other governmental requirements are anticipated and met, and the resulting operating requirements are documented and communicated to those affected. Compliance is periodically verified.

6.10 Proper long-term shutdown or abandonment of facilities is planned and managed.

6.11 Quality-assurance processes are in place, ensuring that facilities and materials received meet designated specifications.
Element 7: management of change

Changes in operations, procedures, site standards, facilities, or organizations must be evaluated and managed to ensure that operations integrity risks arising from these changes remain at an acceptable level.

7.1 A process is in place for the management of both temporary and permanent changes.

7.2 The process for managing change addresses:
- Authority for approval of changes.
- Analysis of operations integrity implications.
- Compliance with regulations and approved standards.
- Acquisition of needed permits.
- Documentation, including reason for change.
- Communication of risks associated with the change and required mitigation measures.
- Time limitations.
- Training.

7.3 Temporary changes do not exceed initial authorization for scope or time without review and approval.
Element 8: third-party services

Third parties doing work on the company’s behalf impact its operations and its reputation. It is essential that they perform in a manner that is consistent and compatible with Imperial’s policies and business objectives.

8.1 Third-party services are evaluated and selected using criteria that include an assessment of capabilities to perform work in a safe and environmentally sound manner.

8.2 Third-party performance requirements are defined and communicated. They include:

- Responsibility for providing personnel appropriately screened, trained, qualified and able to perform specified duties.

- A process for self-monitoring and stewardship.

8.3 Interfaces between organizations providing and receiving services are effectively managed.

8.4 Third-party performance, including leadership, is monitored and assessed, feedback is provided, and deficiencies are corrected.
Element 9: incident investigation and analysis

Effective incident investigation, reporting and follow-up are necessary to achieve operations integrity. They provide the opportunity to learn from reported incidents and to use the information to take corrective action and prevent recurrence.

9.1 A process is in place for reporting, investigating, analyzing and documenting actual safety, security, health, environmental and regulatory compliance incidents and significant near misses.

9.2 Procedures are in place for the law department to investigate, analyze and advise on incidents when necessary.

9.3 Procedures exist for actual incidents and near misses, other than those investigated by the law department, which:

- Provide for timely investigation.
- Consider potential consequences in determining the level of investigation.
- Identify root causes and contributing factors.
- Determine and ensure implementation of actions needed to prevent recurrence of this and related incidents.
- Reflect legal input.

9.4 Findings are retained, periodically analyzed to determine where improvements to practices, standards, procedures or management systems are warranted, and used as a basis for improvement.

9.5 A process is in place to share lessons learned from actual incidents and near misses among Imperial’s operating units and its affiliates, and to interact with others as appropriate to facilitate improvements in performance.

Element 10: community awareness and emergency preparedness

Effective management of stakeholder relationships is important to enhance the trust and confidence of the communities where we operate. Emergency planning and preparedness are essential to ensure that, in the event of an incident, all necessary actions are taken for the protection of the public, the environment and company personnel and assets.

10.1 Community expectations and concerns about our operations, including those of the workforce, are sought, recognized, and addressed in a timely manner.

10.2 Emergency-preparedness, response, and business continuity plans are documented, accessible and clearly communicated. The plans, based on assessed operations integrity risks, include:

- Response actions that address significant incident scenarios.
- Organizational structure, responsibilities and authorities.
- Internal and external communications procedures.
- Procedures for accessing personnel and equipment resources.
- Procedures for accessing essential operations integrity information.
- Procedures for interfacing with other company and external emergency response organizations.
- Process for periodic updates.

10.3 Equipment, facilities and trained personnel needed for emergency response are defined and readily available.

10.4 Simulations and drills are periodically conducted, which include consideration of external communications and involvement. Learnings are identified and addressed.
Element 11: operations integrity assessment and improvement

Assessment of the degree to which expectations are met is essential to improve operations integrity and maintain accountability.

11.1 Operations are assessed at predetermined frequencies to establish the degree to which the operations integrity expectations are met.

11.2 The frequency and scope of assessments reflect the complexity of the operation, level of risk and performance history.

11.3 Assessments are conducted by multidisciplinary teams, including expertise from outside the immediate unit.

11.4 Findings from assessments are resolved and documented.

11.5 The effectiveness of the assessment process is reviewed periodically, and findings are used to make improvements.
The characteristics of management systems

Each operating unit must have in place properly designed and documented management systems that address all the expectations set out in the OIMS framework. Management systems put in place to meet OIMS expectations must incorporate the following five characteristics to be effective. It is important for all five characteristics to be documented.

Scope and objectives
Scope defines the system’s boundaries and identifies interfaces with other systems, organizations and facilities. Objectives clearly define the system’s purpose and expected results.

Processes and procedures
Processes address the steps that describe what the system does and how it functions. Procedures address the key tasks required by a process.

Responsible and accountable resources
Approval authorities, experience and training requirements that qualify people to carry out their roles and responsibilities are specified for both implementation and execution of the system.

Verification and measurement
A system must be checked to see whether it is functioning as designed and is achieving its stated purpose. There are two components. Verification determines that processes and procedures are functioning and being effectively executed. Measurement confirms the quality of system processes and determines that system objectives and results are being achieved.

Feedback and improvement mechanisms
These mechanisms help ensure that actions are taken to continuously improve the system. They use findings from assessments, and from verification and measurement activities, to enhance system suitability, capability and effectiveness.
Evaluation

Ongoing evaluation is essential to make sure that the expectations in the framework are being met. OIMS employs internal and external assessment processes to gauge the degree to which the expectations are being satisfied. Such evaluations provide the information needed to further improve both performance and supportive management systems.

The assessment process focuses on evaluation of management systems. Two system dimensions are included in the evaluation:

1. System status
   • Extent to which the five characteristics of an Operations Integrity Management System are built into the system design and properly documented.
   • Extent of deployment, including communication, training and establishment of measurement, verification and feedback processes.

2. System effectiveness
   • Extent of conformance to system requirements and documentation.
   • Quality of system execution.
   • How well the system is working and whether the stated objectives are being achieved.

OIMS ratings

System status and effectiveness are both appraised during assessments. System status receives a qualitative evaluation of either ‘Meets criteria’ or ‘Needs improvement’. System effectiveness receives a quantitative rating on a scale of 1 to 4, with 4 being the highest level.

The overall assessable unit effectiveness rating is based on the average of the individual system effectiveness ratings.

Assessment frequency

External assessments are conducted every three to five years, with the frequency within that range determined by the operations integrity performance of the assessable unit and the level of risk in the unit’s operation.

Internal assessments are conducted annually in the intervening years. Systems judged by functional business unit management to have the greatest operations integrity impact for each assessable unit are assessed annually. Other OI systems are assessed at approximately the midpoint of the interval between external OI assessments.
Responsibilities for management above the assessable unit

The elements and expectations of the OIMS framework are intended to provide guidance for operations integrity management systems on an assessable unit (AU) basis. However, some aspects of OI management require oversight and support above the level of the AU. OIMS responsibilities for above the AU system(s) and procedures should be in place to address these areas where applicable. The following guidelines address the processes that provide oversight and support to the AU systems and procedures.

Management leadership, commitment and accountability

- Demonstrate commitment to and active engagement in OI activities across relevant areas of responsibility, including participation in OIMS assessments and provision of sufficient resources to meet OI requirements.
- Ensure functional management systems address OIMS expectations and functional guidelines.
- Establish, communicate, and steward assessable unit SSH&E performance and improvement goals across the business; recognize outstanding results/accomplishments.
- Establish and maintain processes to collect and report accurate and timely SSH&E data.
- Communicate expectations for and monitor progress with respect to the implementation of OIMS for operations new to Imperial.
- Managers responsible for businesses operated by others (OBOs), that are not included in an assessable unit, communicate OIMS principles to the operator and encourage the adoption of OIMS or similar systems and monitor implementation.

Risk assessment and management

- Monitor the status of the risk profile for the function and associated mitigation activities.

Facilities design and construction

- Ensure there are responsible minimum standards for facility design and construction, including where regulatory requirements are not adequately protective.
Personnel and training
• Ensure processes are in place to maintain competencies important for operations integrity.

Operations and maintenance
• Monitor the execution of mechanical integrity assurance programs.
• Ensure processes are in place for appropriate regulatory analysis, interpretation and translation.
• Ensure the adequacy of regulatory compliance assurance processes.
• Monitor the status of compliance with regulations and responsible standards.
• Direct environmental business planning and oversee implementation and stewardship.

Management of change
• Ensure operations integrity implications of organizational changes are evaluated and addressed.

Incident investigation and analysis
• Ensure processes are in place for addressing and sharing learnings from company and industry incidents.

Community awareness and emergency preparedness
• Ensure processes are in place to sustain emergency preparedness, response and business continuity for events requiring resources above the assessable unit.

Operations integrity assessment and improvement
• Ensure processes are in place to analyze individual and collective assessment results.
• Monitor the status of assessment follow-up and closure.
• Ensure processes are in place to sustain the effectiveness of assessments, including a review of assessable unit size and approaches (e.g., focus areas, duration, coverage, frequency).
• Periodically evaluate conformance with OIMS responsibilities for above the assessable unit guidelines to ensure intended results are achieved.