## **Guidance for Forcing Flags to Yellow**

## General Guidance:

- If a contractor has more than three red flags automatically assigned by Avetta, red flags should not be forced to yellow. If there is a business imperative to use the contractor, then a management exception should be utilized.
- Contractor EHS Programs <u>must</u> meet regulatory compliance requirements. Forcing flags for the "Manual Audit" requires approval of EHS regional manager or a management exception.
- Overall contractor flags must never be forced; each individual element should be examined for "forcing." This allows appropriate expiration dates to be assigned to the flag force and avoids masking of issues that are identified in the annual review.

| Reason for Red Flag               | Documentation to Review  | Potential Acceptable<br>Rationales              | Expiration Date                                   |
|-----------------------------------|--------------------------|---|---|
| High Injury Rates or<br>High EMRs | Size of Company          | Small company with low number of minor injuries | March 31 <sup>st</sup> of coming year             |
|                                   | Specific or Additional   |   |   |
|                                   | Injury Reduction Plans   | Strong written program                          |   |
|                                   | Written Program          | Injury reduction plan in                        |   |
|                                   | (Strength)               | place and injury rate                           |   |
|                                   |                          | trend is improving.                             |   |
| Citations                         | Corrective Action Plan   | Citation is not directly                        | March 31 <sup>st</sup> of Year of                 |
|                                   | A                        | related to field work                           | Citation + 4                                      |
|                                   | Any available onsite     | Adamatanad                                      |   |
|                                   | inspection documentation | Adequate and                                    |   |
|                                   |                          | appropriate corrective action plan.             |   |
| Fatality                          | Corrective Action Plan.  | Motor Vehicle Accident of worksite              | March 31 <sup>st</sup> of Year of<br>Citation + 4 |
|                                   | Confirm evidence of      |   |   |
|                                   | completion within other  | Confirmed effective                             |   |
|                                   | written documents        | corrective action plan                          |   |
|                                   | Any available onsite     |   |   |
|                                   | inspection documentation |   |   |
| Manual Audit                      | None                     | None  | n/a   |
|                                   |                          |   |   |

## The Why:

## Masking:

