



**PETROLEUM INDUSTRY CERTIFIED HEALTH & SAFETY AUDITORS
EXTERNAL AND MAINTENANCE (INTERNAL)
CODE OF ETHICS**

PURPOSE

This Code of Ethics applies only to auditors that have been certified by Enform ("Enform" or the "Society"). Petroleum Industry Certified Health and Safety Auditors ("Auditor") have an obligation to Enform, their client, their client's employees, industry and regulatory bodies to maintain a high standard of conduct while performing safety audits. In support of this obligation, Enform developed this Code of Ethics with supporting Standard of Conduct, Conflict of Interest Guideline and Examples (collectively the "Code"). The Code encompasses the following three documents: Code of Ethics, Standard of Conduct and Conflict of Interest Guideline and Examples. Adherence to the Code is a requirement for becoming and remaining an Auditor. Following due process, Auditors in violation of the Code may be required to surrender their certification.

The Code covers recognized principles for evaluating and verifying basic safety program activities when measured against the Canadian Petroleum Safety Council Basic Safety Program Audit Protocol (the "Audit Protocol") and Certificate of Recognition ("COR") Standards. The Code is designed to deter wrongdoing and to promote:

- (i) honest and ethical conduct;
- (ii) avoidance of conflicts of interest;
- (iii) compliance with applicable governmental laws, rules and regulations;
- (iv) prompt internal reporting to ENFORM of violations of the code; and
- (v) accountability for adherence to the code.

The petroleum industry believes the Code should be an evolving set of conduct and ethics, subject to alteration as circumstances warrant. Any modifications to or waiver of the Code may be made only by Enform Auditor Disciplinary Committee ("Committee"). The Committee will promptly disclose changes to and waivers of the Code as required. An Auditor shall maintain the integrity of the Audit Protocol and exercise sound judgment in the application of those principals. An Auditor has a responsibility to behave in such a manner that his or her good faith and integrity shall not be questioned. While accepting responsibility for their personal limitations in knowledge and technical skills, an Auditor will promote the highest possible standards of audit evaluation and verification activities.

I. ETHICAL BEHAVIOUR

Each Auditor is expected to act professionally with honesty and integrity throughout the audit process, avoiding actual or apparent conflicts of interest in personal and professional relationships. A "conflict of interest" exists whenever an auditor has the opportunity for private or personal gain or interest that takes precedence over the integrity of the audit process, or when an individual's private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of Enform or its clients.



II. DILIGENCE

Each Auditor is expected to act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing their independent judgment to be subordinated. In doing so, they will comply with all applicable laws, rules and regulations of federal, provincial and local governments, and other appropriate private and public regulatory agencies. Auditors shall provide their clients with information that is accurate, complete, objective, relevant, timely and understandable.

III. CONFIDENTIALITY

Each Auditor shall respect the confidentiality of information acquired in the course of business except when authorized or otherwise legally obligated to disclose the information, maintaining confidentiality in all matters pertaining to their clients.

IV. CORPORATE OPPORTUNITIES

Each Auditor is prohibited from taking for themselves personally (included for the benefit of family members or friends) opportunities that are discovered through the use of Enform property, information or position without the consent of the Committee. No Auditor may use Enform property, information, or position for improper personal gain (including for the gain of family members or friends).

V. WAIVERS OF THE CODE OF BUSINESS CONDUCT AND ETHICS

There shall be no waiver of, modification of, or change to any part of this Code except by a vote of the Committee. In the event that a waiver of, modification of, or a change to this Code is made, the Committee shall make appropriate arrangements to notify the Petroleum Industry Certified Health and Safety Auditors.

VI. REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOUR OR ACCOUNTING OR AUDITING CONCERNS

Auditors shall file a written complaint to the COR Manager of the observed illegal or unethical behavior, violations of the Code or accounting or auditing concerns, when in doubt about the best course of action in a particular situation. It is the policy of the Committee not to allow retaliation for reports of misconduct by others or of accounting or auditing concerns, in each case, made in good faith by Auditors. Auditors are expected to cooperate in internal investigations of misconduct. If an Auditor observes or becomes aware of illegal or unethical behavior, violations of the Code or accounting or auditing concerns, the Auditor shall report that behavior immediately to the Committee.



**STANDARD OF CONDUCT
APPLIES TO BOTH EXTERNAL AND MAINTENANCE (INTERNAL)
AUDITORS**

AUDITORS MUST	AUDITORS MUST NOT
<ul style="list-style-type: none">• Conduct the audit as instructed by the Audit Protocol• Take all reasonable steps to protect the confidentiality of the audit results, data collected, and the anonymity of interviewees• Advise the COR Manager in writing with reasons, whenever the activities or conduct of an auditor appear to be in conflict with this Code of Ethics and Conflict of Interest Guideline• Disclose any potential personal conflict of interest during initial Contact/communication with client• Support and work to improve the audit process	<ul style="list-style-type: none">• Manipulate the audit data to influence the audit outcome• Allow their employer or client to influence the audit results in any way• Attempt to appear independent from the company they are employed by in order to conduct an external audit for that company• Market their services at anytime during the audit process• Accept a fee, gratuity or gift over and above the pre-audit agreement• Audit their own services. Auditors shall not audit a company for whom they have provided consultant services within the previous 12 months. (Certification and Recertification audits only)



CONFLICT OF INTEREST GUIDELINE

The following are the types of situations and consequences that may result when an Auditor submits an audit for review to the Certifying Partner that does not follow the Audit Submission Guidelines that have been endorsed by the Enform Auditor Disciplinary Committee (Committee). The following is not intended to be an all inclusive list of situations and consequences. The Committee shall determine what an infraction is.

	Auditor Infraction	1st Infraction	2nd Infraction	3rd Infraction
1	Incomplete audit notes, recommendations and missing information, e.g. <ul style="list-style-type: none"> • Insufficient # of interviews and sites observed • Group interviews • Deliberate attempts to shortcut audit activities and verification methods • Technical application errors; not following auditor guidelines for each audit question • Not submitting all required audit information e.g. Organization Chart; Company Profile, Checklists, Justification of Interview and site sampling, etc. 	<ul style="list-style-type: none"> • Phone call from Enform • Audit returned with letter outlining requirements and action date • Auditor required to submit information to Enform prior to completion of the quality assurance process 	<ul style="list-style-type: none"> • Phone call from Enform • Audit returned with letter outlining consequences • Immediate interim suspension pending review by Committee 	<ul style="list-style-type: none"> • Phone call from Enform • Auditor to forward required information prior to completion of the quality assurance process • Committee review • Further sanctions/suspensions as determined by the Committee
2	Manipulate data to influence audit results	<ul style="list-style-type: none"> • Phone call and letter from Enform • Committee review and possible sanction 	<ul style="list-style-type: none"> • Phone call and letter from Enform • Interim 6 month suspension • Committee review and possible further sanctions Retake the Enform Certified Health and Safety Auditor Program (CH&SA) 	<ul style="list-style-type: none"> • Permanently barred from becoming a Petroleum Industry Certified Health and Safety Auditor



CONFLICT OF INTEREST GUIDELINE (cont'd)

3	Blatantly marketed services while performing audit	<ul style="list-style-type: none"> • Phone call and letter from Enform • Auditor to write letter of apology to client and to Enform for marketing their services while performing the audit • Committee review and possible sanctions 	<ul style="list-style-type: none"> • Phone call and letter from Enform • Auditor to write letter of apology to client and Enform • Retake the Enform CH&SA Program • Committee review and possible further sanctions 	<ul style="list-style-type: none"> • Committee review with automatic 5 year suspension • On completion of suspension Auditor must completely re-qualify as a Certified Petroleum Industry Health and Safety Auditor
4	Corporate Auditor Group has influenced or is perceived to have influenced the audit findings and recommendations of auditor in their employ	<ul style="list-style-type: none"> • Phone call and letter from Enform • Committee review • Possible further sanctions • Corporate Auditor Group application revoked indefinitely 	<ul style="list-style-type: none"> • Phone call and letter from Enform • 6 month suspension • Retake CH&SA Program • Corporate Auditor Group application revoked 	<ul style="list-style-type: none"> • Permanently barred from becoming a Petroleum Industry Certified Health and Safety Auditor
5	Failure to maintain the confidentiality of their client's business or has disclosed the names of interviewees	<ul style="list-style-type: none"> • Phone call and letter from Enform • Auditor to write letter of apology to client and Enform • Possible interim suspension • Committee review and possible further sanctions 	<ul style="list-style-type: none"> • Phone call and letter from Enform • Auditor to write letter of apology to client and Enform • Immediate interim suspension • Retake CH&SA Program • Committee review and possible further sanctions 	<ul style="list-style-type: none"> • Permanently barred from becoming a Petroleum Industry Certified Health and Safety Auditor
6	Acceptance of a significant fee or gratuity over and above the pre-audit meeting agreement	<ul style="list-style-type: none"> • Phone call and letter from Enform • Auditor to write letter of apology to client and Enform • Auditor to re-take CH&SA Program 	<ul style="list-style-type: none"> • Immediate 5 year suspension • On completion of suspension Auditor must completely re-qualify as a Certified Petroleum Safety Auditor 	<ul style="list-style-type: none"> • Permanently barred from becoming a Petroleum Industry Certified Health and Safety Auditor

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CONFLICT OF INTEREST GUIDELINE (cont'd)

7	Real or perceived conflict of interest	<ul style="list-style-type: none"> • Phone call and letter from Enform • Interim suspension • Committee review and possible further sanctions • Auditor to write letter of apology to client and Enform • Retake CH&SA Program 	<ul style="list-style-type: none"> • Phone call and letter from Enform • Immediate interim suspension • Auditor to write letter of apology to client and Enform • Retake CH&SA Program • Committee review and possible further sanctions 	Upon Committee review, if conflict is confirmed, permanently barred from becoming a Petroleum Industry Certified Health and Safety Auditor
8	Found to be an employee of the company for which the Auditor performed an external audit	<ul style="list-style-type: none"> • Phone call and letter from Enform • Interim suspension and Committee review and possible further sanctions (external auditor only) 	<ul style="list-style-type: none"> • Phone call and letter from Enform • Immediate suspension • Retake CH&SA Program • Committee review and possible further sanctions 	<ul style="list-style-type: none"> • Permanently barred from becoming a Petroleum Industry Certified Health and Safety Auditor
9	Altered the BSP Audit Protocol	<ul style="list-style-type: none"> • Phone call and letter from Enform • Auditor to write letter of apology to client and Enform • Committee review and possible further sanctions • Auditor to complete auditor refresher course 	<ul style="list-style-type: none"> • Phone call and letter from Enform • Immediate suspension • Auditor to write letter of apology to client and Enform • Retake CH&SA Program • Committee review and possible further sanctions 	<ul style="list-style-type: none"> • Permanently barred from becoming a Petroleum Industry Certified Health and Safety Auditor

Notes:

1. The Auditor Disciplinary Committee (Committee) will determine what is deemed to be an infraction.
2. The Committee reviews may result in sanctions that may range from a requirement for the Auditor to retake the Enform Certified Health and Safety Auditor Program to an indefinite suspension.
4. Any review by the Committee that results in a suspension of 6 months or more will require the auditor to re-apply for permission to take the Certified Auditor's program; submission of a qualifying audit; and attendance at the Petroleum Industry Auditor seminar.