Empowering EHS Teams for Success:
CITATION MANAGE™

Getting EHS compliance 'right' is critical in today's rapidly changing regulatory environment. Consistently complying with environmental regulations and managing the associated risk across operations is paramount to your enterprise. But it's not easily done. Legal, regulatory and policy issues are constantly changing and growing in quantity. As a result, organizations are challenged to successfully keep up with the pace of environmental, health and safety (EHS) compliance and its associated organizational risk. At Citation Compliance™, we remove the complexity of EHS compliance. We provide an integrated and complete view of your EHS challenges, eliminating burdensome manual processes.

Key Advantages

- Define regulatory applicability at the site and operation level through "yes or no" questions

- Receive alerts indentifying new, revised, or repealed regulations

- Create and track tasks for site specific policies, permit requirements, sustainability principles and ESG metrics

- Update reviews with versioning capabilities ensuring data is stored from specific times to assist with internal and external audits and compliance processes

Simplifying EHS management

Our key product offering, Citation Manage™, can take the complexity out of the EHS process and put you in control of the rapid pace of change. Our goal? Simplify every aspect of management of your EHS compliance requirements and associated risks at the level that most complements your compliance approach.

Citation Manage™ accomplishes this by giving you the capability to build and run a complete compliance assurance management system by determining your register of applicable requirements, deciding on which regulatory mandated actions are required, and creating tasks that take those actions to the point of compliance in the field. These tasks include owners, due dates, and frequency, along with cloud-based operational control and evidence record capability. Using Citation Manage™ allows you to complete the "golden thread" from high level legal requirement to the regulatory actions that must be taken to the site level operations where compliance is demanded and achieved.

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CITATION MANAGE™

Citation Manage™ delivers a Software-as-a-Service (SaaS) Environmental Health & Safety compliance solution that simplifies the myriad legal, regulatory and policy requirements for businesses, making it possible for these firms to reduce compliance costs and risk, while increasing the effectiveness and efficiency of core EHS processes and simplifying the auditing process. Citation Manage™ is a collaborative solution created by EHS experts, many former leaders in major corporate EHS organizations, working hand-in-hand with our software developers.

Currently, the Citation Manage™ solution delivers business value to hundreds of sites

Key Features and Benefits

∧ Uses simple questions to identify, understand, and respond to relevant regulatory requirements and obligations. Our analysts review all regulations to identify potentially applicable compliance requirements, and then distill volumes of this information into workable passages for the user.

∧ Offers functionality covering awareness, applicability, task writing, compliance action alerts, verification, report generation, change management through versioning, and risk assessment and audit capabilities.

∧ Citation Manage™ allows the user to incorporate company policies, standards, sustainability initiatives, ESG metrics, permit requirements, and other supplementary requirements, allowing you to store all information in one place along with the regulatory information that comes as part of Citation Manage™. This allows the user to avoid duplicate effort in managing multiple systems and or information repositories.

∧ Lists requirements, both legal and supplementary, including subject area, citation, title, summary, and supporting links all in one view.

∧ Allows multiple-user options for sharing knowledge with key stakeholders to streamline decision-making.

∧ Gives full-text EHS regulations & statutes.

SaaS/ Cloud-Based Delivery

Citation Manage™ is delivered to you as a service. Software-as-a-Service adoption is ramping up as more global enterprises embrace software delivery applications over the Internet. This is referred to as SaaS, "On Demand Software" or even "Cloud Computing."

Citation Manage™ can be implemented rapidly, eliminating the need for infrastructure and ongoing costs that traditional applications require. SaaS offers the following advantages:

Zero Infrastructure - Reduced Overhead
Since the application is hosted by the service provider, investing in expensive infrastructure is not required. Customers can access and use the application on the Internet through any browser.

Cost-effective Infinite Scalability
With a solution like Citation Manage™, you can control the utilization of the software and pay for only the functionality you need.

Easy to Implement
Since the solution is delivered via the Internet, Citation Manage™ completely eliminates installation and setup at the customer's end. Users can be up and running within days.

Improved Security
We understand that data must be backed up routinely, and information security is of the utmost importance. Skilled resources, network redundancies, stand-by power, up-to-date security and intrusion detection are mandatory infrastructure elements required to provide an enterprise class service. Such level of infrastructural investment far exceeds the norm for a single organization or team.

How it Works

Citation Manage's 4-Step Process

The Citation Manage™ solution follows a Four Step process to deliver complete compliance in a consistent manner, across all your operations. Let's look at each step:

^ **REDUCE OVERHEAD & RISK**

^ **INCREASE PROFIT & COMPLIANCE**

1. Applicability Review and Risk Prioritization

Citation Manage™ presents a decision-making process to determine and prioritize applicable Environment, Occupational Health, Safety and Security legal and other requirements.

^ Applicability Team

Citation Manage™ utilizes an "applicability review team" decision-making approach. Knowing that almost all compliance is achieved in the field or on the factory floor and not in the EHS organization, Citation Manage™ encourages building a team of stakeholders and EHS subject matter experts.

Users can either employ a Citation Manage™ - supplied listing of typical activities, products, and services or they can self-define their own operations. A user can elect to evaluate a single site or more than one site at a time. The mix of information availability and full-site representation yields a team dynamic that delivers the highest quality applicability determinations in the shortest time.

Citation Manage™ is recognized as the leader and de facto standard for addressing the challenge of monitoring, managing, and maintaining complex EHS issues.

^ Company Policies and Procedures

Citation Manage™ can incorporate "other requirements" such as company policies,

standards, sustainability initiatives, ESG metrics, permit requirements, or other supplementary requirements alongside regulatory provisions.

The integration of legal and corporate requirements allows for a more consistent applicability decision and avoids the dual path that frequently exists when dealing with external and internal requirements.

^ Applicability Questions

By using a simple, conditions-based applicability questionnaire format written in everyday language, Citation Manage™ breaks through country "legalese" to present information upon which operational personnel can reasonably act. Citation Manage™ provides all the information necessary for a user to accurately and efficiently determine applicability. A worldwide team of regulatory experts analyzes laws and regulations to create the applicability questions and explanatory information.

^ Explanatory Information and Documentation

Applicability questions are accompanied by user-friendly regulatory summaries, expert-written Guide Notes, and links to full-text regulations and standards. An area to preserve applicability determination rationales is also available.

^ Applicability Register

The Applicable Requirements Register lists all requirements, both legal and supplementary, that were evaluated during the screening process as applying to a site. Included in the Register are the subject area, citation, title, summary, and link to the full text of the requirement - all in one view.

The Applicable Requirements Register can be used to satisfy conformance with ISO 14001:2015 4.3 and OHSAS 18001.

The Register can be structured to show applicable requirements by defined operation or service, as well as display all non-applicable determinations and the associated rationale.

Risk Prioritization of the Register

Citation Manage™ has functionality that allows the user to employ a worst-case noncompliance scenario risk assessment to order the Applicable Requirements Register in risk order. By answering a series of likelihood, impact and criticality questions your register is re-ordered with highest risk to the business leading the list. In order to achieve compliance all requirements must be worked on but in an era of limited resources and many priorities, knowing what to work on first is an important step in maximizing the resultant work effort.

2. Tasking

The second component of Citation Manage™ is the building of the compliance assurance management system based on the applicable requirements. Citation Manage™ analysts break down the high-level applicable requirement into the detailed compliance actions that the law requires to be accomplished in order to achieve compliance. Citation Manage™ allows the user to decide which detailed compliance actions apply to the site and then create tasks to include owners, due dates with email alerts, along with identification of operational controls and evidence records.

The user can also build custom compliance tasks and associate those tasks with company policies, standards, sustainability initiatives, ESG metrics, permit requirements, or other supplementary requirements deemed necessary.

A task reporting feature of Citation Manage™ is the Compliance Matrix, which can be used "as is" to manage compliance within our software or it

can be uploaded into a third-party Environmental Management Information System (EMIS).

3. Validation

The third component of the Four Step Process is the generation of Progress Checklists. Progress Checklists provide a cost-effective solution to users to test how well they are doing in the building and maintenance of their compliance assurance management system and regulatory obligations.

The best Progress Checklist is one that is tailored to the site being reviewed. Focusing reviewers on those laws and regulations that specifically apply to a site (possibly with a sample of non-applicable requirements) saves valuable time and provides the site with a highly cost-effective, quality review.

How is this accomplished? The site needs only to run the progress checklist report from Citation Manage™ to obtain a focused listing of all requirements that apply to the facility, site or project. Progress can be reviewed at the site level or at any of the operational levels defined when initially doing the Citation Manage™ review. Combined with the Citation Manage™ Applicability Register, the Progress Checklist enables you to perform a thorough review of your facility.

The Progress Checklist links the applicable high-level laws, regulations and company policies, standards, sustainability initiatives, ESG metrics, permit requirements, or other supplementary requirements to the specific compliance task that must be accomplished to achieve compliance.

The Applicability Register provides the reviewer with a complete record of what is considered applicable and what was not, including rationale statements that justify the decision making.

It also allows for site specific Progress Checklists to be produced at no cost and on-demand with the most current information possible.

According to the EPA, in fiscal year 2021, enforcement and compliance assurance actions has cost companies $1.06 billion in penalties (the highest amount in four years) and twenty-eight years of incarceration for defendants in criminal enforcement investigations.

4. Updates

The final component of the four-step process - and possibly the most valuable - is the ability to keep your compliance assurance management system up to date. Without question, a compliance assurance system must have the capability for Management of Change (MoC). Citation Manage™ provides the user with the most up-to-date notification of potential additions, changes or deletions to a site's Applicability Register and corresponding compliance tasks.

Users are made aware of changes through their dashboard or email notifications and can adjust their Operational Controls and Compliance Tasks

accordingly. These changes are analyzed by Citation Compliance™ Regulatory Analysts who write change descriptions that are presented in the same simple language approach used during the initial applicability review. Included with the platform update is an explanation of the regulatory change with revised summaries, guide notes and links to the actual requirement.

Citation Manage™ updates enable the applicability review team to determine applicability of all new requirements, decide whether to delete compliance activities for repealed requirements or to continue them as supplemental requirements, and review changed requirements to determine if previous applicability decisions need to be revised.

By allowing the team to review only those changes that can have an impact on operations, Citation Manage™ enables site personnel to add, change, or delete compliance activities for only those requirements that are new or have changed, reducing the MoC effort dramatically.

Having this direct link from applicability determination to the site's compliance activities will enable the user to truly justify compliance at the site and to be sure of an ongoing, sustainable compliance assurance system.

Signed in as Jason Sirois   List of Reviews   View My Tasks   Worksheets Queue   Settings   Help   Logout

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List of Reviews > **Requirement Changes**

Review Name: Wind Turbine Array   **Date:** 2022-01-20 (US Mountain Standard Time)
Jurisdiction: United States / Colorado   **Location(s):** [New Location]

Search Table Contents [   ]   [Impacting and Non-Impacting v]   [Hide 'Not Applicable' requirements   v]

Action	Change Description	Impacting	High Level Requirement	Citation	Subject Area	Changed Detailed Requirements	Tasks
🗎	🗎	⚠️	Navigation and Navigable Waters - Maritime Security: General	33 CFR 101	Marine	0 0 0	0
🗎	🗎	❗	NAVIGATION AND NAVIGABLE WATERS - Maritime Security: Facilities	33 CFR 105	Marine	0 2 1	0
🗎	🗎	⚠️	Navigation and Navigable Waters - Marine Security: Outer Continental Shelf (OCS) Facilities	33 CFR 106	Marine	0 0 0	0
🗎	🗎	❗	Navigation and Navigable Waters - Offshore Oil Pollution Compensation Fund	33 CFR 135	Marine	2 0 0	0
🗎	🗎	❗	Navigation and Navigable Waters - Safety Zones	33 CFR 147	Marine	1 1 0	0
🗎	🗎	❗	Navigation and Navigable Waters - Vessels Carrying Oil, Noxious Liquid Substances, Garbage, Municipal or Commercial Waste, and Ballast Water Subpart A	33 CFR 151 Subpart A	Marine	0 2 0	0
🗎	🗎	⚠️	Navigation and Navigable Waters - Vessels Carrying Oil, Noxious Liquid Substances, Garbage, Municipal or Commercial Waste, and Ballast Water - Transportation of Municipal and Commercial Waste	33 CFR 151 Subpart B	Marine	0 0 0	0

Citation Manage™ has revolutionized the arduous task of developing and maintaining a site's Compliance Assurance Management System. Using Citation Manage™ as the foundation of a company's compliance assurance management system gives way to the adage, "**in order to end right, you must start right.**"

How CITATION MANAGE™ Compares:	CITATION MANAGE™ - INCLUSIVE SOLUTION Small/medium scale operations who are looking for an affordable total compliance solution.	SPECIALIZED SOLUTION Large scale operations who need applicability services for multiple operational sites.
Define regulatory applicability at the site and operation level through "yes or no" questions	⋀	⋀
Support in achieving ISO Certifications and ANSI standards through the creation of a high-quality Regulatory Register	⋀	⋀
Streamline operations by tracking impacting and non-impacting EHS regulatory changes that link directly to on-site tasks	⋀	⋀
Receive alerts identifying new, revised, or repealed regulations	⋀	⋀
Easily identify actions and outstanding tasks to consistently achieve and remain in compliance	⋀	⋀
Build site and/or operations specific tasks with owners, due dates, descriptions, and evidence records	⋀	⋀
Generate excel reports to include a compliance matrix, self assessment checklist, legal register, task status, or risk matrix	⋀	⋀
Create, track and write tasks for site specific sustainability principles and ESG metrics	⋀	⋀
Update reviews with versioning capabilities ensuring data is stored from specific times to assist with internal and external audits and compliance processes	⋀	
Schedule individual or recurring tasks to ensure compliance obligations are met through everyday operations	⋀	
Collect data for internal audits to identify gaps and ensure compliance with all applicable policies, procedures, high-level, detailed, and permit requirements	⋀	
Manage compliance within Citation Compliance™ or a third-party Environmental Management Information System	⋀	

Get started today

citationcompliance.com

info@citationmanage.com

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