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1.1 - EMERGENCY CONTACT LIST

EMERGENCY CONTACT

INTERNAL CONTACT EMERGENCY NUMBERS	Denille Garcia, P.Eng – President Faye Garcia, Operations Manager Tony Flynn, Control Systems Engineer Arthur Wang, Control Systems Engineer	Cell (403) 993-1337 Cell (403) 554-3293 Cell (403) 828-6614 Cell (587) 889-6674
EXTERNAL EMERGENCY CONTACT NUMBERS	Fire/Ambulance/Police/RCMP Alberta Emergency Management (AEM) Alberta Public Safety (TDG) Alberta One Call Alberta Power – 24-hour Emergency ATCO Gas	911 1-866-618-2362 1-800-272-9600 1-800-242-3447 1-800-668-5506 1-800-551-3447
REGULATORY EMERGENCY CONTACT NUMBERS	Alberta OH&S - fatality, crane or building collapse. Alberta Environment (chemical spill)	1-866-415-8690 1-800-222-6514

1.2 - DISTRIBUTION LIST

DISTRIBUTION LIST

MANUAL #	RECIPIENT	POSITION	LOCATION
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- 1
- 2
- 3
- 4
- 5

1.3 - REVISION LOG

REVISION#	REVISED DATE	SIGNATURE	LOCATION
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1.4 - INFORMATION TO MANUAL HOLDERS

The information contained in this Health & Safety Manual includes the company’s policies and procedures. This safety manual is applicable to all personnel/contractors and **will be reviewed at least every 3 years** or more often if there is a change in circumstances at the work site that creates or could create a hazard to workers and revised as appropriate.

For more municipal, provincial, or federal information, refer to the appropriate jurisdiction government regulations. The company will ensure that all company policies, procedures, and rules are included in the New Hire Orientation process.

1.5 - COMPANY GOALS

DEG ENGINEERING is committed to conducting operations in a healthy and safe manner. The goal of the company is to develop a program and processes for all employees, contract workers and sub-contractors that will hopefully eliminate but at least mitigate hazards to reduce workplace incidents and accidents. This HSE manual encompasses the company’s health and safety programs’ policies and procedures. Safe Work Practices and Formal Hazard Assessments have been developed along with this manual to identify hazards and put in place control measures and preventative measures to keep employees, contract employees and subcontractors safe at work. Although we have included some provincial legislation in this manual, employees are encouraged to access the provincial Legislation and Codes as well. A copy of or access to the provincial Legislation and Codes will be provided by this company at all work sites.

Workplace Violence, Workplace Harassment and any psychological harm to our employees will not be tolerated by the Company. Employees will be provided with training to understand the definition of Workplace Harassment and Violence and the process of how to prevent and report occurrences.

The Company will provide a positive safety culture starting with senior management's commitment to the health and safety of all employees, hiring skilled workers, providing on-the-job training and specific health and safety training to employees and informing employees of the possible hazards in their individual job tasks and ensuring control measures to keep the safe have been implemented.

To ensure all health and safety concerns of employees are communicated to the Company and to meet with provincial legislation, the company has set up a safety committee with both Manager and Worker members and Co-Chairs to review all reported health and safety concerns and input by employees, contract workers and sub-contractors performing work at the company’s office and work sites. The Company’s workers will elect a Worker Safety Rep, with whom they trust, who will be responsible for reporting back their health and safety concerns and advice to the Committee and senior management. The Committee will review every report and ensure timely communication back with solutions and preventative measures to ensure their health and safety while at work.

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SECTION 2 - HEALTH & SAFETY POLICIES

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- 2.11 – WHMIS
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- 2.13 – SHORT SERVICE WORKER PROGRAM

2.1 - HEALTH AND SAFETY POLICY STATEMENT

At **DEG ENGINEERING** our overall goals and objectives include the commitment to the Health and Safety of our employees and others impacted by our activities, and to the protection of the environment. Working safely and protecting the environment by following legislation. We will work actively to meet or exceed our established Health and Safety goals. We constantly strive to improve our Health and Safety performance and to prevent accidents and incidents that result in injury, illness, and environmental damage.

Management Commitment

At **DEG ENGINEERING** the safety and health of our employees come first. Management is committed to the promotion and maintenance of the physical, psychological, and social well-being of workers and will provide a safe and healthy work environment. The President/Owner of the company will ensure that workers are supervised by competent Supervisors.

Overall Goals and Objectives

Our company’s overall goal is to ensure the safety of all its employees, contractors and visitors to our office sites and reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing those in the same industry. Our goal is zero accidents and injuries.

General Responsibilities

Management/Owner is responsible for ensuring the health and safety resources, including safety training, are supplied to all personnel working for the Company. Management is responsible for ensuring that Supervisors are given the skills and training necessary to ensure the health and safety of the individuals they will be instructing work to. Management will ensure that all employees work in a work environment that is safe and will protect against any form of workplace harassment or violence.

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Manager is responsible for ensuring that their employees are trained in approved work procedures and to ensure that employees follow safe work methods. Managers will be responsible for ensuring Supervisors have the appropriate training and resources to do their jobs in a healthy and safe manner and ensure safety compliance for the company. Management is responsible for ensuring OH&S Legislation and Codes are being followed by the company and that Supervisors are aware of legislation and any changes to legislation.

Supervisor is responsible for following all provincial legislation and cooperating with any person exercising duty under OH&S Legislation. Supervisors must ensure that all workers are working in cooperation with each other and will ensure they are protected against violence or harassment by others. Supervisors will be responsible for ensuring employees are not performing any work that they feel unsafe doing and must advise all workers of their right to refuse dangerous work and go over the Work Refusal process. Supervisors and Managers will cooperate and consult with the company's Joint Health and Safety Committee and resolve any health and safety issues or concerns in a timely manner.

Contractors-Self-Employed Workers are responsible for ensuring they follow the health and safety policies of the company and/or the prime contractor on site, follow provincial OH&S regulations and have the appropriate safety training and skills for the work that they will be performing. All Contractors and Self-employed Workers must cooperate with the Joint Health and Safety Committee and resolve any health and safety issues at the work site in a timely manner.

Employees are required to support the health and safety program make safety and health a part of their daily routine and ensure that they are following safe work methods and relevant regulations if employees feel that doing so would place them in danger, they must refuse the work and contact their immediate supervisor. Workers must treat others with respect and not engage in harassment or violent behaviour with anyone at the company, visitors, the public or contractors on work sites. Employees must comply with all applicable legislation as well as company policies and rules.

Visitors are required to sign in and be escorted at all site locations follow company rules and wear PPE required for sites.

Health and Safety Compliance with Government Regulations

All relevant laws and regulations are incorporated in our program as minimum standards and must be complied with by all supervisors, workers, contractors, self-employed workers, and visitors on site.

Company health and safety policies and rules must be adhered to by the team lead, supervisors, workers, visitors and contractors, and self-employed workers at all work sites as well as any health and safety rules, policies, and procedures of the designated prime contractor.



Denille Garcia, P. Eng, President

Dated: March 13, 2025

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2.2 – WORK REFUSAL POLICY

All provinces have legislated the right to refuse dangerous work. In Alberta, it is the duty and responsibility of the employee to refuse dangerous work. The Company will follow Alberta OH&S Legislation (see new Bill 47 legislation bulletin)

Part 4

Dangerous Work and Disciplinary Action

- ✓ **December 1, 2021, Update - Right to refuse** Obligation/right to refuse the definition for “Dangerous Condition” was replaced with an “Undue Hazard” - Undue hazards under the New Act are defined to include hazards that pose a serious and immediate threat to the health and safety of a person.

This Bulletin gives information about a worker’s right to refuse dangerous work, and the processes involved.

KEY INFORMATION

- Work site parties can best address serious health and safety concerns through cooperation and internal resolution processes.
- Workers can refuse dangerous work that poses a serious and immediate threat to health and safety.
- OHS officers can inspect work sites for compliance with legislated requirements and investigate alleged undue hazards in relation to section 17 of the OHS Act.

Health and safety concerns

Workers and employers have general obligations under Part 1 of the Occupational Health and Safety Act (OHS Act). These include the obligation to raise and address health and safety concerns at the work site, including:

- Under section 5(1)(e), workers must report concerns about unsafe or harmful work site acts to their employer or supervisor.
- Under section 3(1)(f), employers must address reported health and safety concerns promptly.

While an employer is addressing a concern, other general obligations still apply. For instance, the worker must take reasonable care to protect themselves and others (section 5(1)(a) of the act) and the employer must do what is reasonably possible to protect the worker and others (section 3(1)(a) of the act).

In all cases, the focus of all work site parties should be on identifying and assessing the hazard, working together to resolve the matter, and ensuring no one is in harm’s way. If there is one, a joint health and safety committee (HSC) or health and safety representative (HS representative), will help to resolve the concern. If the worker cannot resolve the health and safety concern with the employer, they can notify

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Alberta OHS. OHS officers have the authority to inspect work sites and investigate health and safety concerns, to verify compliance with OHS legislation.

Work refusals

Section 17 of the OHS Act enables workers to refuse work if they reasonably believe there is an undue hazard at the work site or that work poses an undue hazard to themselves or others. An undue hazard is a serious and immediate threat to health and safety that the refusing worker observes or experiences at their work site. General health and safety concerns are not dealt with under the work refusal process as they are not considered undue hazards.

Examples of undue hazards include:

- Sudden infrastructure collapses that result in an unsafe physical environment.
- A danger that would normally stop work, such as broken or damaged tools/equipment, or a gas leak.

Section 17 of the act describes the steps that workers and employers must follow in the work refusal process. These steps are obligations for both work site parties.

Worker obligations

You must report your refusal and the reasons for it promptly. Report to your supervisor, employer, or the employer's designate.

As much as possible, ensure your refusal does not endanger the health and safety of others. For example, if safe to do so, place barriers around the danger to prevent others from being hurt.

In this section, “undue hazard’ in relation to any occupation includes a hazard that poses a serious and immediate threat to the health and safety of a person. Throughout the work refusal process, cooperate with your employer if it is safe and reasonable to do so.

Employer obligations

First steps: remedy or stop work and inspect, If possible, remedy the hazard immediately. In some cases, you may be able to resolve the issue and resume work right away. For example, if you can:

- Provide replacements for broken or damaged tools/equipment.
- Assign a trained and competent worker to a task that an untrained worker is refusing to do.

If you can't remedy the hazard immediately, you must stop work, discuss the matter with the refusing worker, and conduct a hazard inspection, assuming it is safe and reasonable to do so.

You cannot resume work or assign another worker to the task until you have done the hazard inspection and either remedied the hazard or determined there is no hazard.

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HSC or HS representative involvement

If you have an HSC or HS representative, inform them of the refusal as soon as possible.

- You must do this even if you were able to remedy the hazard immediately.
- Do not give personal information to the HSC or HS representative.

The HSC or HS representative may raise concerns or make recommendations. As an employer, you must respond to these promptly.

Work refusal reports

If you had to do an inspection, you must write a work refusal report. This report must include:

- The circumstances surrounding the work refusal.
- Details of the hazard inspection.
- Any actions taken to remedy the undue hazard if you determined there was one.

Your work refusal report should not include any personal information, such as the name or identity of the refusing worker.

Privacy laws govern information sharing. If you believe personal information is necessary in your report, make sure that it is authorized under privacy law. You must give the worker and the HSC or HS representative (if there is one) a copy of the report.

Work assignments

You can temporarily assign the refusing worker to different work during the work refusal process:

- The worker must be capable of doing their temporary work assignment.
- The temporary work can be on the site where the work refusal occurred if it is safe to be there.
- Temporary work assignments cannot result in loss of pay. You can require a refusing worker to resume work or assign another worker to the work if you have remedied an undue hazard immediately, done a hazard inspection, resolved the hazard if necessary, and shared a work refusal report as required.

Notifying OHS

Throughout the process, work site parties should use internal processes to address work refusals and work through their legislated obligations. However, if the refusing worker receives your work refusal report and still thinks there is an undue hazard, they may notify OHS.

Workers can also notify OHS if they believe you have not carried out your obligations per section 17 of the act.

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If you learn that a worker has notified OHS, you must advise (in writing) any other worker assigned to the work of:

- The first worker’s refusal.
- The reason they refused.
- The reason you believe there is no undue hazard.

Alberta OHS - OHS Contact Centre

Call the OHS Contact Centre if you want more information about raising health and safety concerns or work refusals.

An OHS Contact Centre advisor can clarify employer and worker obligations and may ask questions such as:

- Did the worker report their work refusal?
- Has the employer assigned another worker to do the work?
- Is there a work stoppage at the work site?
- What did the employer do to address the situation?
- Did the employer write and share a work refusal report?
- Has OHS inspected the work site in relation to the issue?

Section 13(1) of the OHS Act states the purpose of an HSC or HS representative is “ensuring cooperation between the employer and workers with respect to health and safety.” This cooperation can be key to effective work refusal resolutions.

You may notify OHS if you are a worker who has refused unsafe work and:

- Your employer has not carried out their work refusal obligations.
- Your employer has carried out their obligations, but you still believe there is an undue hazard.
- After notification, an OHS officer will verify – by phone or by attending the work site – that the parties have followed their internal resolution process and met their legislated work refusal obligations.
- If the officer finds that the employer has not met their duties, the officer will take steps to encourage the employer to fulfill their obligations.

In some cases, if an employer revisits the decision in its work refusal report, the officer can work with the parties to resolve the matter.

OHS work refusal investigation

If the officer finds that the work site parties met their work refusal obligations, and the worker still disagrees with the employer’s final decision, the officer will investigate if there is an undue hazard. During the investigation, the officer may inspect the work site, ask for information and documents and/or speak to individuals.

After the officer finishes the investigation, they give a report to the refusing worker, the employer and the HSC or HS representative (if there is one). The OHS report includes a summary of the officer’s decision, findings, and rationale.

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- If an undue hazard does not exist, the officer informs the worker of that finding.
- If an undue hazard exists, the employer must take immediate action to remedy it. (When this is complete, the officer informs the worker of the outcome.)

The employer or worker can appeal the officer’s determination of whether an undue hazard exists with the Alberta Labour Relations Board (ALRB). The ALRB makes its decision based on whether the officer’s determination in the work refusal was reasonable.

DEG ENGINEERING will conduct their own investigation on work refusals and the steps will include:

1. The Supervisor will investigate the work and/or environment deemed to have an undue hazard if safe to do so. Causes and root causes will be established.
2. The Supervisor will assess any hazards and concerns and, if necessary, stop work immediately.
3. If the undue hazard can be corrected, it will be corrected immediately.
4. If the work site and conditions appear to be safe the Supervisor will notify Management and/or Safety Rep/Committee to go over the report.
5. A written report using the Work Refusal Report form will be completed and signed off by the Supervisor and Worker.
6. Management and/or Committee will review the report and make recommendations.
7. Work will resume only when management deems the site/work to be safe.
8. A full investigation by the Committee will take place and a written report submitted to management.



Denille Garcia, P. Eng, President

Dated: March 13, 2025

2.3 - ENVIRONMENTAL POLICY

The Company is committed to operating in such a manner that prevents pollution, noise, odour, and decreases negative environmental impact and minimizes risk to both human health and the environment.

The Company is committed to protecting human health and the environment through regulatory compliance, ensuring measures are in place for energy conservation and the continuous review of our operations.

All employees/contractors must understand and take responsibility for maintaining and protecting the environment. Local management is empowered to stop operations, as necessary, to prevent serious environmental impacts. Employees/contractors are encouraged to exceed the requirements of all applicable environmental laws, regulations, and standards.

The Company Is Committed to:

Communicating with our employees, customers, suppliers, the communities in which we operate and public officials to build greater mutual understanding of environmental issues such as:

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1. Minimizing the environmental impacts on the local habitat when activities affect them.
 2. Managing operations to comply with all applicable Provincial laws and regulations and other requirements to which we subscribe, with emphasis on pollution prevention, and minimizing adverse environmental impacts.
 3. Coordinate with the project or site owner for the disposal of waste or scrap materials developing and implementing measures to ensure sustainable use of materials, recycling, resources, and energy.
 4. The use of vehicles and equipment will be considered to minimize the impact on the environment.
 5. Purchasing products with minimal impact on the environment.
 6. Promoting and developing awareness, leadership, and accountability with respect to environmental protection among all our employees and persons working for us or on our behalf.
- ✓ **The Company will** take into consideration project wastes, trash and /or scrap materials before work begins.
 - ✓ **The Company will** strictly follow all applicable legislation, regulations, standards, handling and storage requirements and guidelines that regulate our areas of operation.
 - ✓ **The Company will** continually monitor and measure our activities with respect to environmental effects and will act upon the findings in a time-sensitive manner.
 - ✓ **The Company will,** wherever feasible, reduce our consumption of renewable and non-renewable resources. We will recycle, reuse, and reduce our waste materials.



Denille Garcia, P. Eng, President

Dated: March 13, 2025

2.4 - COMPANY SAFETY RULES AND REGULATIONS

Rules and regulations are an integral part of our Health & Safety Program. When used effectively, they will contribute to the overall success of our firm.

Safety and the Environment will not be compromised by using unsafe equipment or procedures.

No Worker Shall:

- Carry out any work if, on reasonable and probable grounds, he believes that there exists an imminent danger to the health or safety of that worker,
- Carry out any work if, on reasonable and probable grounds, he believes that it will cause an imminent danger to the health or safety of that worker or another worker present at the work site, or
- Operate any tool, appliance, or equipment if, on reasonable and probable grounds, he believes that it will cause imminent danger to the health and Safety of that worker or another worker present at the work site.

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Specific Company Rules

1. Prior to the commencement of work, the job site and all work equipment shall be inspected to ensure safe work conditions. All work site or equipment and PPE deficiencies shall be corrected before commencing work.
2. All work shall be carried out in accordance with safe work practices and at your supervisor's discretion. Do not attempt to perform a job before you have received instructions as to the correct method.
3. All employees/contractors shall wear Canadian Standards Association (CSA) approved Personal Protective Equipment (PPE), (steel-toed boots/hard hat/safety glasses/gloves) and clothing as required by company policy and OH&S legislation.
4. All unsafe acts and conditions, including "near miss" incidents, injuries, and equipment damage are to be reported promptly to the On-Site Supervisor. He/she will ensure the proper incident report is completed and passed on to Management.
5. Only those tools that are in good repair, with all guards and Safety devices furnished by the manufacturer in place shall be used. Defective tools shall be tagged and sent in for repair under the direction of the Supervisor.
6. Only authorized personnel using the appropriate safety devices shall operate equipment and power tools.
7. Use the right tools and equipment for the job.
8. No employee/contractor shall board or disembark from a moving vehicle, ride on a vehicle other than inside the cab, shall remain in, or on a trailer while being moved, or during the coupling/uncoupling of a tractor unit.
9. Employees of the Company are expected to always work and conduct themselves in a safe and orderly manner and will not be engaged in any form of workplace violence or harassment of others.
10. Employees/contractors must maintain their workspace in a safe condition and remove any objects or debris that might cause accident or injury, by interfering with working conditions.
11. All protective clothing and Safety devices provided by the Company must be worn when required by job task.
12. The wearing of CSA-approved SAFETY shoes or foot protective devices is compulsory in the field/job site.
13. All machine guards and Safety devices must be always used. Tampering with or otherwise circumventing any Safety device is prohibited.
14. Personal Protective Equipment must **NOT** be modified or changed.
15. All employees/contractors must know the location and use of fire extinguishers and first aid supplies.
16. Any employee/contractor using over-the-counter medication/prescription drugs causing drowsiness, impaired judgment, or the ability to drive/operate machinery shall inform the Company's management and co-workers prior to the starting of work, and the type of medication being taken in the event an emergency should occur.
17. All visitors/contractors must report to the office before going about their business on or around the worksite.
18. All employees must report to or call the office or immediate supervisor before and after going about their business in the field when working alone.

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19. Employees will be disciplined, verbally and in writing and possible dismissal from smoking in prohibited areas.



Denille Garcia, P. Eng, President

Dated: March 13, 2025

2.5 - DRUG POLICY - FITNESS FOR DUTY & SUBSTANCE ABUSE

The Company recognizes that employees who use or are impaired by drugs or alcohol while performing work endanger not only themselves but also their co-workers and others affected by the work. The policy about such conduct is one of zero tolerance and employees must be aware that any violations they commit may result in disciplinary action up to and including termination. **The company’s Drug and Alcohol program will comply with the Canadian Model and/or other recognized industry standards.**

However, the Company also recognizes that addiction to drugs or alcohol is a serious health problem. The intent of this Policy is to accomplish the health and safety goal in a manner that is fair, humane, and consistent with employees’ accommodation rights under discrimination laws. The goal is not to punish but to help employees identify and get help for their substance abuse issues so that they can return to work healthy, safe, happy, and productive.

Purpose

The objective of this substance abuse policy is to ensure that all employees report to work fit for duty. Adopting this Policy is a reasonably necessary measure that the Company is required to take to ensure the health and safety of workers at its sites and facilities under Section 2(1) of the Alberta Occupational Health and Safety Act (OHS Act).

Scope

This Policy applies to all individuals who work for the Company including but not limited to full-time, part-time, temporary and contract employees, independent contractors, volunteers and employees of third-party contractors or subcontractors that the Company engages to perform work at its facilities.

- A. Union Employees This Policy applies to both union and non-union employees but is not intended to supersede or circumvent the provisions of any current collective agreement that the Company has negotiated with an employee’s union. In the event of a conflict between this Policy and a collective agreement, the latter shall control.

- B. Contractor Employees This Policy applies to individuals employed by contractors and subcontractors that perform work at the Company facilities but is not intended to supersede or circumvent the provisions of any current collective agreements that those contractors or subcontractors have negotiated with their own workers and their unions. In the event of a conflict between this Policy and a contractor employment agreement or collective agreement covering the worker, the latter shall control.

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Definitions

For the purposes of this Policy:

- **“Drugs”** includes:
 - Narcotics and illegal drugs.
 - Marijuana whether used or obtained legally or illegally.
 - Legal prescription and over-the-counter medications and drugs that cause or have the potential to cause impairment and render an employee not fit for duty.
- **“Fit for duty”** means a state of physical and mental that allows an individual to perform his or her job duties safely and effectively without impairment due to the use of or after-effects of alcohol, illegal drugs, legal medications, or other health conditions.
- **“On duty”** includes reporting for and performing work, including:
 - Scheduled work.
 - Unscheduled call-in work.
 - Work performed on the Company’s facilities.
 - Work performed for the Company away from Company facilities, including but not limited to driving or travelling to and from work.
- **“Safety-sensitive job”** means positions that have a direct and substantial impact on the health and safety of the employee, other workers, customers, visitors, the public, property and/or the environment, including but not limited to those involving driving, operation of machinery or equipment, handling of toxic substances and others determined by the Company.
- **“Substance abuse”** means the use of alcohol, illegal drugs, legal marijuana medications and other substances that can impair a person’s judgment, clarity and functioning and render him/her not fit for duty.

Requirements for Employees

All employees and workers covered by this Policy are required to:

- i. Come to work fit for duty.
- ii. Be informed of the company’s Drug and Alcohol program.
- iii. Refrain from using or being impaired by alcohol or drugs while they are on duty.
- iv. Refrain from possessing, purchasing, selling, distributing, or engaging in any other conduct involving are on duty.
- v. Refrain from misusing or being impaired by prescription or non-prescription drugs while they are on duty.
- vi. Notify their supervisor if they suspect that a co-worker is unfit for duty.
- vii. Submit for drug and alcohol testing in accordance with the Companies Testing Policy.

Requirements for Supervisors

- i. It is a requirement for Supervisors to be trained in recognizing impairment and how to respond.
- ii. Supervisors must receive training in the identification of and response to substance abuse.

Legal Marijuana

- A. No Exemption for Legal Marijuana Use All employees must understand that marijuana is an impairing drug and that using it at work or coming to work high renders them unfit for duty in

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violation of this Policy. This is true regardless of whether their use of marijuana is legal under federal drug laws.

Legal marijuana use is not a justification for being unfit for work!

- B. Employee Duty to Notify Employees must notify their supervisor if they are using legally prescribed medical marijuana or other legal prescription and non-prescription drugs that may cause impairment for the treatment of a medical condition. Off-duty and legal use of such drugs does not violate this Policy as long as employees are always fit for duty when they are on duty.

Support for Employees with Substance Abuse Issues

Although the Company reserves the right to discipline, it also recognizes that addiction and substance abuse a health problems. The Company is prepared to help employees get the counselling, treatment, rehabilitation and support they need to overcome those problems.

Self-Reporting

The Company strongly encourages employees with substance abuse problems to step forward and request help voluntarily. [Describe your organization’s procedures for responding to self-report requests for help.] Employees who do self-report will not be subject to discipline if they have complied with their obligation to be fit for duty under this Policy.

Fitness for Duty Medical Assessments

Employees must undergo medical assessments to ensure they are fit for duty before being placed in a safety-sensitive job. Assessments will address substance abuse and be performed:

- Prior to employment when individuals are applying for safety-sensitive jobs.
- Before current employees are transferred from non-safety-sensitive to safety-sensitive jobs.
- Periodically for as long as the employee remains in a safety-sensitive job.

Medical assessments will be performed by qualified healthcare professionals following appropriate medical practices and results will be kept confidential to the extent required by personal privacy laws.

Disciplinary Investigations

The Company may open a disciplinary investigation to check whether an employee is engaged in substance abuse or otherwise in violation of his/her fitness for duty obligations under this Policy in response to:

- Complaints or concerns by co-workers, supervisors, etc.
- Declining performance.
- Erratic behaviour.
- Involvement in safety incidents including near misses.
- Arrests for impaired driving, drug offences and similar violations.
- Other indications that the employee has substance abuse issues or is otherwise not fit for duty.

Investigations will be carried out in accordance with the Company’s Disciplinary Investigation Procedures.

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Drug & Alcohol Testing

Employees may be tested for alcohol and drugs in accordance with the Company's testing policies. Pre-access testing may be conducted for employees performing safety-sensitive work and/or working at safety-sensitive jobs.

Alcohol and drug testing:

- i. Testing will be conducted if there is a reasonable suspicion an employee is under the influence.
- ii. Testing must be performed by a certified lab.
- iii. Post-accident/incident testing following an incident or near miss.
- iv. Random and for cause/post-incident testing.
- v. Supervisors will escort employees to the screening site for testing.
- vi. Refusal to submit to testing will be grounds for immediate termination under this Policy.

Procedure for conducting post-incident/accident drug testing:

- i. Where there is an accident/incident or near miss that may have been caused due to drug or alcohol use, the company will ensure those involved are tested for one or both substances.
- ii. The company will make an appointment for those involved in the incident with a certified drug testing lab.
- iii. Once the results are known those involved will be notified if any drug or alcohol has been detected.
- iv. The employee(s) will work with the Company's HR department to determine the next steps which could include disciplinary measures and/or help for the employee to get counselling, treatment, rehabilitation, and support needed.

Privacy

The Company recognizes that test results and related information are protected personal information under privacy laws and will keep it confidential and secure and refrain from using or disclosing it except as permitted or required by law.

Consequences of Violations

Violation of this Policy is grounds for discipline up to and including termination in accordance with the Company Progressive Discipline Policy. Employees with substance abuse issues on administrative leave may also be referred for counselling or assistance through the Company Employee Assistance Program or outside agencies.

Assistance & Reinstatement

The Company reserves the right to place employees with substance abuse issues on administrative leave and enter into Last Chance Agreements offering them the opportunity to return to work if they successfully complete the terms of their treatment and rehabilitation program, pass drug and alcohol tests and meet other conditions of reinstatement.

Employee Right to Accommodations

The Company recognizes that drug and alcohol addiction is deemed a disability under the Alberta Human Rights Act. Accordingly, in administering the disciplinary and other provisions of this Policy,

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addictions and other substance abuse related to disabilities, such as the use of medical marijuana or prescription drugs for chronic pain and debilitating conditions, will be treated as non-culpable violations and employees will be offered reasonable accommodations based on their individual circumstances and capabilities to the point of undue hardship.



Denille Garcia, P. Eng, President

Dated: March 13, 2025

2.6 - DISCIPLINARY ACTION POLICY

The purpose of disciplinary action is to prevent an infraction from recurring. Management has the responsibility for developing and maintaining good discipline within their organization.

The following disciplinary actions are listed in order of severity and in most cases, in the order that they would be administered. Workers will be given a verbal warning for first offences unless the offence is so great that it warrants immediate dismissal. When such a warning is given and the misconduct continues, the Supervisor should follow through with the stated actions.

All disciplinary action must be recorded using the discipline action form that will document the inappropriate actions, expected performance, disciplinary results, and signatures of Workers and Management. Disciplinary action will include:

- **Verbal Reprimand**
Discuss the violation with the worker. Warn that more severe action will follow if the offence is repeated. Agree on a time frame for retraining or other action to prevent a recurrence.
- **Written Reprimand**
Discuss the violation and give a written copy of the reprimand to the worker. Place a copy in the worker's file. Advise the worker of more severe consequences should the offence be repeated.
- **Discharge or Termination of Contract**
Depending on the severity of an infraction or intent of the worker, the worker may be terminated at the discretion of Management (i.e.: operating company vehicle/equipment while under the influence of alcohol/violence in the workplace).

Denille Garcia, P. Eng, President

Dated: March 13, 2025

2.7 - WORKING ALONE POLICY

DEG ENGINEERING shall where reasonable, avoid situations requiring workers to work alone. Working alone is the performance of any work function by a worker in circumstances where the worker cannot be seen or heard by another worker in the event of injury, ill health, or emergency. In cases where a worker is required to work alone, the employer shall, before assigning the worker to work alone, identify hazards to that worker, take measures to eliminate the hazard if possible, or minimize the risk

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of the hazard to the lowest reasonable level using engineering controls, administrative controls, or a combination of engineering and administrative controls through measures, policies, and procedures, developed in consultation with and regularly reviewed by the joint health and safety committee and/or health and safety representative.

In cases where a worker is required to work alone, the employer shall, before assigning the worker to work alone, provide training, developed in consultation with the joint health and safety committee and/or health and safety representative, to the worker regarding actual or potential hazards arising from the work, and regarding measures, policies, equipment, and procedures that exist to prevent harm to that worker.

Legislative Requirements

Alberta OHS Legislation – Part 28 - Working Alone

Application

393(1)

This Part applies if:

- a. a worker is working alone at a work site, and
- b. assistance is not readily available if there is an emergency, or the worker is injured or ill.

393(2)

Working alone is considered a hazard for the purposes of Part 2.

Precautions required

394(1)

An employer must, for any worker working alone, provide an effective communication system consisting of:

- a. radio communication,
- b. landline or cellular telephone communication, or
- c. some other effective means of electronic communication that includes regular contact by the employer or designate at intervals appropriate to the nature of the hazard associated with the worker's work.

394(1.1)

Despite subsection (1), if effective electronic communication is not practicable at the work site, the employer must ensure that:

- a. the employer or designate visits the worker, or
- b. the worker contacts the employer or designate at intervals appropriate to the nature of the hazard associated with the worker's work.

Examples of Working Alone

- A receptionist/Office worker in a large office building may be considered a 'lone worker' if working at night or even a receptionist closed off to the other offices by a public door/entrance.

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- Workers who travel to meet clients (such as home care workers, social workers, and bylaw enforcement officers).
- Workers who travel alone but have no routine interaction with customers or the public (such as truck drivers or businesspeople who are on the road alone).
- Workers who are at risk of a violent attack because their work site is out of the public view (security guards, employees meeting new clients not in an office environment/alone).
- Workers who handle cash.
- Workers who do hazardous work but have no routine interaction with customers or the public.

Steps to Keep a Lone Worker Safe

- Avoid having a lone worker whenever possible, especially for jobs with recognized risk. Travel in pairs to meetings or when travelling alone if possible.
- Assess the hazards of the workplace. In what situations might a worker at the company ‘work alone’?
- Talk with workers about their work. Get their input about the work they do and possible solutions.
- Investigate working-alone incidents, harassment/violence.
- Take corrective action to prevent or minimize the potential risks of working alone.
- Ensure all employees always have a cell phone or some type of communication device with them. If there is any indication that there could be no cell phone coverage in the area the employee is travelling, develop a check-in plan or provide another means of communicating (laptop/satellite phone).

When performing **high-risk activities** while working alone, the Company Supervisor and employee or contractor must identify existing or potential health and safety hazards related to working alone and determine the following details prior to commencing work:

- High-risk work being performed.
- Destination.
- Estimated time of arrival.
- Return time or date.
- Employee contact information (cell phone, pager, emergency contact information).
- Supervisor contact information (cell phone, home phone, pager), especially if working after hours.
- Determined contact frequency.
- Mode of travel (driving, plane).
- Alternate plans in the event of bad weather, traffic problems, etc.

The following procedure must be adhered to by company employees/contractors working alone in all field locations:

- Hazard Assessment – Any employee/contractor working alone must assess the hazards involved with the work to be performed and minimize all hazards.
- Ensure that a safe work procedure, risk assessment and a JHA for the task are in place and understood.
- Ensure that required PPE is available and operable.

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- Caution should be used in all work to ensure that the employee/contractor/sub-contractor does not place themselves in situations of avoidable risk.
- Direct contact must be always available in proximity. In most cases, this will consist of cellular telephone.
- If direct contact is not available, the employee/contractor must check in with the supervisor at appropriate intervals and check out with the Supervisor immediately after the work is complete.

Driving/Travelling Alone

1. Obtain accurate written directions and instructions.
2. Plan and discuss the route to be taken with the manager and personnel at the destination.
3. Managers must be notified of changes to the discussed route or destination.
4. Managers must be notified of any unscheduled stops.
5. Phone ahead and reserve a hotel room.
6. Obtain means of purchasing fuel (visa, fuel card, purchase order).

Thoroughly check the vehicle to be used to ensure it is in proper working order. Check the following and complete a pre-trip inspection form:

- Spare tire.
- Lights on the vehicle are operational.
- Registration and Insurance.
- Working cellular phone.
- First aid kit.
- Roadside reflectors.

Managers and Supervisors are responsible that:

1. Employees have a current phone list or required phone numbers.
2. Determine road conditions from local authorities.
3. Estimate time of arrival to destination.
4. Employee has proper PPE and warm clothes.
5. Drive according to road conditions and stop driving if the weather becomes severe.
6. Upon arrival, contact the manager to inform them that you have arrived safely.
7. When properly rested, begin the journey back to the operations base.



Denille Garcia, P. Eng, President

Dated: March 13, 2025

2.8 - SMOKING/VAPING POLICY

DEG ENGINEERING is committed to providing a healthy and safe work environment by reducing the hazards caused by smoking/vaping. The Company follows all applicable Provincial Government Regulations and the Tobacco Reduction Act for Alberta. This policy applies to the Company employees, sub-contractors, and all visitors to the Company property.

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The Company has restricted smoking in the workplace premises to certain designated areas. Designated smoking areas will be clearly posted with signs. Smoking is not permitted in company-owned, rented, or leased premises or vehicles. This policy applies to all employees/contractors and visitors on the Company worksites and facilities.

When Company employees are working on a client jobsite, they will adhere to all client requirements respecting designated smoking/non-smoking areas.



Denille Garcia, P. Eng, President

Dated: March 13, 2025

2.9 - DISTRACTED DRIVING POLICY

Purpose

To clearly communicate corporate policy with respect to the use of cellular communication devices while operating a motor vehicle.

To clearly communicate corporate Policy with respect to driving without due care and attention.

Policy

Due to the increasing number of accidents resulting from distraction during driving and particularly, the use of cell phones and wireless devices while driving, the following policy is in place.

It is the policy of the Company that no employee while operating a motor vehicle while on company business or on company time shall use a cellular communication device or engage in other non-driving activities that will reduce awareness and performance on the primary task of driving.

Distracted Driving Legislation effective September 11, 2011, Restricts Drivers from:

- Using hand-held cell phones.
- Texting or e-mailing.
- Using electronic devices like laptop computers, video games, cameras, video entertainment displays and programming portable audio players (e.g., MP3 players).
- Entering information on GPS units.
- Reading printed materials in the vehicle.
- Writing, printing, sketching, and Personal grooming.
- Complements the current driving without due care and attention legislation.
- Applies to all vehicles as defined by the Traffic Safety Act, including bicycles.
- Applies to all roads in both urban and rural areas of the province.

Use of Radio Communication Devices (e.g. CB radios, "Mike Technology)

Drivers may only use hand-held radio communication devices if:

- They are drivers of escort, pilot or trail vehicles and are using a radio communication device for the purpose set out in the regulation.

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- Using the radio communication device to contact their employer, where that employee is required to maintain radio contact with his or her employer.



Denille Garcia, P. Eng, President

Dated: March 13, 2025

2.10 – FATIGUE MANAGEMENT POLICY

This program is to ensure our employees recognize the effect of fatigue as related to safely being able to perform work and to establish guidelines for work hours and equipment to reduce fatigue in our business and at our client locations.

The guiding principles of fatigue management shall be incorporated into the normal management functions of the business and include the following:

- Workers must be in a fit state to undertake work.
- Workers must be fit to complete work.
- Workers must take minimum periods of rest to safely perform their work.

These principles will be managed through:

- The appropriate planning of work tasks, including driving, vehicle, and equipment maintenance, loading, and unloading and other job-related duties and processes.
- Providing appropriate equipment to help reduce stress and fatigue.
- Regular medical checkups and monitoring of health issues as required by legislation.
- The provision of appropriate sleeping accommodations where required.
- Ongoing training and awareness of employee health and fatigue issues

Roles and Responsibilities

The following addresses the roles and responsibilities of workers to report tiredness/fatigue to supervision and that supervision takes appropriate action to assist the worker.

Management

- Management accepts responsibility for the implementation of this fatigue management policy.

Site Manager

- Responsible for the implementation and maintenance of this program for their site and ensuring all assets are made available for compliance with the program.

Workers

- Workers must never operate motor vehicles and/or heavy equipment while excessively fatigued.

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- Workers must not chronically use over-the-counter, prescription drugs and any other product which may affect an employee’s ability to perform their work safely, including fatigue that sets in after the effects of the drug wear off.
- Workers need to monitor their own performance and take regular periods of rest to avoid continuing work when tired.

Work Hour Limitations and Rest Breaks to Control Fatigue and Increase Mental Fitness

Work schedules are managed to help control worker fatigue.

The company will set work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and increase mental fitness. Work schedules should take into consideration the amount of rest between workdays, shift work, on-call time, travelling across different time zones, etc.

Analysis of Work Tasks to Control Fatigue

Job tasks are designed to minimize/control fatigue. Work tasks to control fatigue must be analyzed and evaluated periodically. Fatigue hazards should be minimized. Examples of fatigue hazards include the type of work task, the length of the task, workplace conditions, etc.

Initial and Annual Training for Workers on Fatigue and Controlling Fatigue

- Workers are provided training on the Fatigue Management program. Training must be provided on how to recognize fatigue, and how to control fatigue through appropriate work and personal habits and fatigue reporting.
- Workers will receive initial and annual training.
- A record of individual fatigue training and competency will be maintained.



Denille Garcia, P. Eng, President

Dated: March 13, 2025

2.11 – WHMIS GHS – WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM

WHMIS GHS is a global harmonized system to provide information on hazardous products in the worksite. All employees must be trained in, and be familiar with, WHMIS GHS requirements. Certification is valid for three years after the date of training.

It is company policy that all workers who work with or near a hazardous product will have access to all hazard information in the form of a Safety Data Sheet (SDS).

DEG ENGINEERING will have a written Workplace Hazardous Materials Information System (WHMIS) program. The company must ensure that a hazardous product is used, stored, and handled at a work site in accordance with all applicable Provincial and Federal regulations.

As defined in the Workplace Hazardous Materials Information System (WHMIS) the company must ensure that all potential hazards associated with the use, handling, storage, manufacturing, and disposal of hazardous products are identified, eliminated, or minimized.

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Responsibilities

If hazardous products are used in the workplace, in consultation with the joint committee or employee health and safety representative, as applicable, will establish and maintain an effective WHMIS program at each work site, as part of the overall workplace health and safety program, which addresses applicable WHMIS requirements including education and training, and is reviewed at least annually, or more frequently if required by a change in work conditions or available hazard information.

Managers

It is the responsibility of each manager to ensure WHMIS GHS requirements are met in all locations under his or her authority, which includes:

- Labelling of all containers.
- Educating employees on WHMIS GHS
- Providing personal protective equipment (PPE) and monitoring use.
- Ensuring Safety Data Sheets (SDS) for all hazardous products are current and available to employees.
- Maintaining an updated Hazardous Product Inventory List.
- Providing the designated supervisor with a copy of the current Hazardous Product Inventory List.

Employees

- To reduce the risk of hazardous product exposure employees are expected to comply with WHMIS legislation and this program and therefore be familiar with labelling and safety data sheets (SDS) of hazardous products used in the workplace.
- Employees shall follow all label and SDS requirements.
- Employees will immediately report any concerns regarding the WHMIS program to their supervisor.

Procedure

- No WHMIS hazardous products or materials will be allowed to be used unless there is a valid Safety Data Sheet available on-site and there is a supplier or workplace label on the container for any hazardous product that is produced, manufactured, or used at a site.
- The company will ensure the SDS is obtained from the supplier when receiving a hazardous product on each job site.
- The company will ensure that SDS is filed at the worksite, available and posted where the hazardous products are used and readily accessible to employees.
- Managers will ensure that employees are notified if a hazardous product is to be used in an open area or where fumes may migrate.
- A Hazardous Product Inventory List and Safety Data Sheets shall be kept at a main location and will be made available to employees for review.
- All hazardous waste is labelled and workers are trained on safe handling of hazardous waste. If a hazardous product is a hazardous waste generated at the work site, the company must ensure that it is stored and handled safely using a combination of any means of identification and instruction of workers on the safe handling of the hazardous waste.

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Hazardous Product Inventory List

- The company maintains a listing of all hazardous products used by the site at each facility.
- This hazardous product inventory list is updated as necessary and at least annually by the site WHMIS Coordinator or their designee.
- The facility hazardous product inventory list must be available for review upon request.
- The Hazardous Product Inventory List is maintained in a computer file folder in each location. The manager is responsible for seeing that the inventory is maintained, is current and is complete. The manager will review the inventory and the SDS Book at least annually, and sign and date the Review and Update section at the front of the SDS Book when the review is complete.

Storage of Harmful Substances

All containers used or handled at a workplace, which by reason of toxicity, flammability or reactivity create risk to the health or safety of employees shall be contained, so far as is reasonably practicable in a suitable container which is clearly labelled to identify the substance, the hazards associated with its use or handling, the workplace uses for which it is intended and protective measures to be taken by employees before, during and after its use.

Harmful substances are to be stored in a self-contained enclosure, room or building that is isolated from work-related areas and worksites and is adequately ventilated and protected from conditions, including excessive temperature, shock or vibration that could reduce the stability or increase the potential hazard of the substance.

Safety Data Sheets

Safety Data Sheets (SDS) must be obtained for every hazardous product that is handled, used and stored at the worksite.

SDS must be readily available to all workers who may be exposed to the hazardous product, and to the Health and Safety Committee or Representative, where applicable. Electronic repositories of SDS are permissible if they may be quickly and easily accessed by all affected parties. SDS should accompany any chemicals brought to client/customer sites.

Labels, Labelling and Warnings

All hazardous products are labelled with either a supplier label or a work site label. The company has a procedure to ensure that a hazardous product or its container at a work site has a supplier label or a work site label on it. Supplier labels must be affixed to the original containers of hazardous products. No person shall remove, deface, or alter the supplier label if any amount of hazardous product remains in the container. If the supplier label is missing or illegible, it shall be replaced with a workplace label.

If a hazardous product is produced in a workplace the company shall ensure that the hazardous product or the container of the hazardous product has a workplace label and SDS. Employees who are unsure of the contents of any container, vessel or piping must contact their supervisor for information regarding the substance including:

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- The name of the hazardous product (must match the SDS product identifier).
- Information for safe handling of the hazardous product.
- A reference to the SDS for further information.

Workplace labels must be affixed to hazardous products that have been transferred from the original container into another container. Labels are not required on containers if:

- the container is for immediate use,
- it is under the control of and for the exclusive use of the worker who transferred it,
- it is for use only on that shift, and/or
- the contents are clearly identifiable.

Personnel in the Shipping and Receiving Departments are responsible for the proper labelling of all containers shipped and for the inspection of all incoming materials to ensure correct labelling. Hazardous products received from vendors that are not properly labelled must be rejected.

Training

All workers who work with or near hazardous products must be provided WHMIS 2015 training. The company must ensure all workers who work with, or who may be exposed to, hazardous products are provided training on WHMIS 2015 (GHS). Topics covered shall include but are not limited to:











- a general introduction to WHMIS 2015, the components, legislation, and guidelines,
- education in the required content of WHMIS labels and SDSs,
- education in the purpose and significance of that information to worker's health and safety on the job,
- education pertaining to workplace-specific WHMIS program administration, and locations of SDSs.

Training may be performed in-house or by a 3rd Party. Additional training will be provided whenever a new hazardous product hazard is introduced into the work area. To reinforce the importance of handling hazardous products properly when performing new or non-routine tasks, Supervision will conduct supplementary training as needed. Formal training will be conducted by facility employees or individuals who are knowledgeable in the WHMIS program.

When an outside contractor enters the worksite to perform a service for the company, he must first present SDSs for all hazardous products he will use. These SDSs will be treated as above with the same training requirements. The operations manager will be responsible for contacting each contractor before work is started to gather and disseminate any information concerning hazardous product hazards the contractor is bringing into the workplace.

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WHMIS Pictograms/Symbols

 <ul style="list-style-type: none"> Flammables (gases, aerosols, liquids, solids) Self-reactive substances and mixtures Pyrophoric liquids, solids, and gases Self-heating substances and mixtures Substances and mixtures which, in contact with water, emit flammable gases Organic peroxides 	 <ul style="list-style-type: none"> Explosives* Self-reactive substances and mixtures Organic peroxides
 <ul style="list-style-type: none"> Skin sensitization Acute toxicity (harmful) Hazardous to the ozone layer* Specific target organ toxicity - single exposure (Cat. 3) Eye irritation Skin irritation 	 <ul style="list-style-type: none"> Carcinogenicity Respiratory sensitization Reproductive toxicity Specific target organ toxicity - repeated exposure Specific target organ toxicity - single exposure (Cat. 1, 2) Aspiration hazard Germ cell mutagenicity
 <ul style="list-style-type: none"> Acute toxicity (severe) 	 <ul style="list-style-type: none"> Corrosive to metals Serious eye damage Skin corrosion
 <ul style="list-style-type: none"> Oxidizing gases, liquids, solids 	 <ul style="list-style-type: none"> Gases under pressure
 <ul style="list-style-type: none"> Hazardous to the aquatic environment* 	 <ul style="list-style-type: none"> Biohazardous infectious materials

*The Environmental hazard classes and the Explosives hazard class have not been adopted in the HPR.

Labels must be in French and English. They may be bilingual (as one label) or as two.

Labels will require the following:

- the pictogram, signal word, and hazard statement are to be grouped together,
- to be clearly and prominently displayed on the container,
- to be easy to read (e.g., you can see it easily without using any item except corrective glasses), and
- to be in contrast with other information on the product or container.

Product K1 / Produit K1




Danger

Fatal if swallowed.
Causes skin irritation.

Precautions:
Wear protective gloves.
Wash hands thoroughly after handling.
Do not eat, drink or smoke when using this product.

Store locked up.
Dispose of contents/containers in accordance with local regulations.

IF ON SKIN: Wash with plenty of water.
If skin irritation occurs: Get medical advice or attention.
Take off contaminated clothing and wash it before reuse.
IF SWALLOWED: Immediately call a POISON CENTRE or doctor.
Rinse mouth.

Danger

Mortel en cas d'ingestion.
Provoque une irritation cutanée.

Conseils :
Porter des gants de protection.
Se laver les mains soigneusement après manipulation.
Ne pas manger, boire ou fumer en manipulant ce produit.

Garder sous clef.
Éliminer le contenu/éciipient conformément aux règlements locaux en vigueur.

EN CAS DE CONTACT AVEC LA PEAU : Laver abondamment à l'eau.
En cas d'irritation cutanée : Demander un avis médical/consulter un médecin.
Enlever les vêtements contaminés et les laver avant réutilisation.
EN CAS D'INGESTION : Appeler immédiatement un CENTRE ANTIPOISON ou un médecin.
Rincer la bouche.

Compagnie XYZ, 123 rue Machin St, Mytown, ON, N0N 0N0 (123) 456-7890

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Hazardous Product Inventory List – Must contain the following:

Date D/M/Y	Hazardous product Name/Identifier	Location(s) Stored	UN# & Class	Label Attached?	SDS Available?	Reviewed D/M/Y



Denille Garcia, P. Eng, President

Dated: March 13, 2025

2.12 - MANAGEMENT OF CHANGE

Management of Change (MOC) is a process which ensures that planned changes and modifications to existing equipment or processes are recognized, documented, reviewed, and approved prior to implementation. This prevents safety, environmental and operational incidents from occurring. The MOC process involves a formal written procedure that clearly defines the responsibilities and accountabilities of employees and contractors.

The Management of Change program requires those who administer it to keep in mind that only five to ten out of every thousand changes are potentially high risk, with fifty to one hundred that qualify for the program. To ensure that changes to processes, chemicals, technology, equipment, and facilities are appropriately managed, the Company will complete an MOC review on all changes except for "Like for Like Changes".

Management of Change procedures must also be considered for changes in procedures, maintenance, purchasing, operations, facilities, and equipment. This includes the qualifications of staff and staffing levels. A hazard assessment will be completed prior to the use of any new product.

General Safety Regulations, Risk Insurance Assessments and Corporate Safety Management Initiatives require the implementation of an MOC process.

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Safety and Health Impact

Before a change can be implemented, a review of the change's impact on the health and safety of the workers and public must be completed. It must be determined and ensured that the proposed change complies with the Corporate Safety Manual and all Federal, Provincial and Municipal legislation. A risk assessment should be performed in accordance with the risk assessment requirements.

Management Responsibilities

Management must review and justify the proposed change. If the change is justified, management will sign the request form and forward it to the assigned MOC coordinator. Management is responsible for ensuring that the MOC procedure is followed and that the changes are properly reviewed and understood prior to the implementation of the change and the start-up. Management will ensure that all personnel and stakeholders have been included in the MOC pre-project and the pre-start-up meetings and are involved with the process.

Management will ensure that a pre-start-up safety review has been completed to verify that the change has been implemented in accordance with the design drawings, specifications, and standards, and all deficiencies have been corrected.

Management is also responsible for:

- Approving an MOC, so that it enters the system.
- Acting as the MOC coordinator, or assigning the MOC coordinator, depending on the scope and risk associated with the proposed change.
- Developing and implementing procedures to formally examine all changes, as required by this practice.
- Assigning the appropriate individuals to review all aspects of the change, this includes communication and contact with other units, and where necessary, other operations and affected employees.
- Ensure that documentation is complete.
- Approve the Start-up after the Pre-start-up Safety Review has been completed.

MOC PROCEDURE

Operation of the “Management of Change” Program

- Classify the change as either "Replacement in Kind" or "Management of Change".
- All work orders and work permits will have a check space which will require a determination of if Management of Change is necessary: MOC (y) or (n). This will be determined by the knowledge gained from the training program and the use of the decision tree.
- Initiate the Management of Change Procedure.
- Initiation of the MOC will require the Change Authorization Form.
- Assign a Management of Change Coordinator.
- The coordinator will administer the project through to its conclusion.
- Assess the Potential Risk.
- Use of the Risk Matrix and examples in the Potential Severity Table.
- Conduct the necessary Discipline Reviews.

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- The Management of Change Coordinator will select the appropriate technical personnel to review the change.
- Obtain Authorization.
- The level of Authorization required will depend on the risk level of the change.
- Implement the Management of Change Project.
- Prepare for Commissioning.
- Prior to the Start-up, train staff and ensure that all documentation is updated and on file.
- Provide Project Closure via Pre-Start-up Safety Review.



Denille Garcia, P. Eng, President

Dated: March 13, 2025

2.13 - SHORT SERVICE WORKER PROGRAM

The purpose of the Short Service Worker Program is to prevent work-related injuries and illnesses in new hires and temporary workers. This program applies to all new hire employees regardless of experience working on company and client location.

The Supervisors and co-workers must be able to readily identify Short Service Employee participants. All new hires and temporary workers with less than 6 months of experience will be assigned a mentor to oversee the daily activities.

Definitions

Short Service Employee and/or New Employee – An employee or subcontractor employee with less than six months experience in the same job with his/her present employer, or in his/her present role.

Mentor – An experienced employee who has been assigned to help and work with a new Short Service Employee by his/her supervisor.

Key Responsibilities

Managers and Supervisors shall ensure that this program is implemented and followed.

Site Managers shall monitor its employees, including SSE personnel, for HSE awareness and compliance. If, at the end of the six-month period, the SSE has demonstrated competency and compliance with HSE policies and procedures the Site Manager may remove the hi-visibility identifier.

Subcontractors must adhere to the requirements of the SSE program. Subcontractors will manage their SSE in accordance with the requirements of this program.

Employees shall follow the requirements of this program.

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Procedure

- Supervisors will ensure that all new, transferred, and temporary employees have been through Safety Orientation and have complete knowledge of the expectations for their job function.
- Supervisors will identify all employees and temporary personnel with less than 180 days of service who do not work alone, and/or those employees who desire to return to a mentoring status for improvement in job and/or safety performance.
- Short Service Employee participants will wear high visibility orange hard hats to help identify them. When working in the field, all technicians shall comply with the client-designated hardhat colour for SSE if orange is not acceptable and the method used to identify SSE workers will be communicated to the owner client.
- All Short Service and or new Employees will be identified to the owner client prior to starting the contract.
- SSE staff is mentored by an experienced/knowledgeable employee. The company shall have in place some form of mentoring process, acceptable to the owner-operator, designed to provide guidance, assistance, and development.



Denille Garcia, P. Eng, President

Dated: March 13, 2025

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SECTION 3 - ROLES & RESPONSIBILITIES

3.0 - ROLES & RESPONSIBILITIES INDEX

- 3.1 - CORPORATE ACCOUNTABILITY
- 3.2 - MANAGEMENT/LEADERSHIP COMMITMENT
- 3.3 - MANAGEMENT RESPONSIBILITIES
- 3.4 - SAFETY DEPARTMENT RESPONSIBILITIES
- 3.5 - SUPERVISOR RESPONSIBILITIES
- 3.6 - PRIME CONTRACTOR RESPONSIBILITIES
- 3.7 - CONTRACTOR'S RESPONSIBILITIES
- 3.8 - WORKERS RESPONSIBILITIES
- 3.9 - VISITOR RESPONSIBILITIES

3.1 - CORPORATE ACCOUNTABILITY

PURPOSE AND GOALS

The purpose and goals of the Health & Safety Program are to provide corporate direction to employees/workers/contractors to ensure that the company's Health, Safety and Environment Policies and requirements are met or exceeded. The Company's first and foremost goal is the safety of its people, those it works with and the public.

Health and Safety Policies convey management's commitment and positive attitude toward Health, Safety, and the Environment. To be effective, management will promote the policy and commitment actively throughout the company. Health and Safety Policies are the underlying foundation of the Health and Safety Program.

The Health & Safety Manual is a mandatory company program and as such must be understood and adhered to by all company employees and contractors. While every effort has been made to ensure that the information contained within this manual is up-to-date and meets or exceeds the requirements of regulatory agencies and provincial legislation should any discrepancy be noted between the information within this manual and legislation the legislation will be adhered to.

DEG ENGINEERING uses regulatory requirements as the minimum standard for its safety program. These requirements include all acts, regulations, policies, practices, and procedures administered by governments and their agencies. The Company intends to follow all Health, Safety, and Environmental legislative laws in all jurisdictions in which it does business. In instances where the policies and standards are not complied with, it is essential that there is an equitable and consistent enforcement and disciplinary procedure. Safety rules are enforced first through proper orientation and on-the-job training and communication; and second, through disciplinary measures that will be taken against all employees/contractors who fail to comply with them.

DUE DILIGENCE

Section 217.1 of the criminal code now states that: "Everyone who undertakes, or has the authority, to direct how another person does work or performs a task is under a legal duty to take reasonable steps to prevent bodily harm to that person, or any other person, arising from that work or task".

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- ✓ It is not acceptable to kill, injure or negatively affect a worker’s health or safety at the workplace.
- ✓ It is a performance measure of health and safety management in your workplace.
- ✓ Due diligence always depends on the facts of the situation, but it is too late to build a defence after the incident!

The Government of Canada, through the Department of Justice, has instituted the accountability of corporate executives and directors for the wrongful or negligent acts of the corporation and has introduced in Parliament such amendments to the legislation as necessary to ensure that corporate executives and directors are held properly accountable for workplace Safety.

In short, **DEG ENGINEERING** will now be held accountable for any wrongful act/injury/fatality on a worksite from upper Management down to the field Supervisor/Prime Contractor/Contractor/Worker. A Company will also be charged separately from WH&S as a criminal offence.

“Due diligence is the level of judgment, care, prudence, determination, and activity that a person would reasonably be expected to do under particular circumstances”.

Why Care About Due Diligence?

Commonly referred to as the “General Duty Clause”, every province and territory in Canada has similar occupational HSE Legislation that describes the obligations of employers and workers.

Alberta’s Clause Reads as Follows

- 1) Every employer shall ensure, as far as it is reasonably practicable for the employer to do so,
 - a. The Health and Safety of,
 - i. Workers engaged in the work of that employer, and
 - ii. Those workers not engaged in the work of that employer but present at the work site at which that work is being carried out, and
 - b. That the workers engaged in the work of that employer are aware of their responsibilities and duties under this Act and the Regulations.

- 2) Every worker shall, while engaged in an occupation,
 - a. Take reasonable care to protect the Health and Safety of the worker and of other workers present while the worker is working, and
 - b. Co-operate with the worker’s employer for the purposes of protecting the Health and Safety of,
 - i. The worker,
 - ii. Other workers engaged in the work of the employer, and
 - iii. Other workers not engaged in the work of that employer but present at the work site at which that work is being carried out.

- 3) Every supplier shall ensure, as far as it is reasonably practicable for the supplier to do so, that any tool, appliance, or equipment that the supplier supplies is in safe operating condition.

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- 4) Every supplier shall ensure that any tool, appliance, equipment, designated substance, or hazardous material that the supplier supplies comply with this Act or the Regulations.

- 5) Every contractor who directs the activities of an employer involved in work at a work site shall ensure, as far as it is reasonably practicable to do so, that the employer complies with this Act and the Regulations in respect of that work site.

What Does “Reasonably Practicable” Mean?

At first glance “reasonably practicable” looks like a subjective way of determining someone’s guilt or innocence. However, “reasonably practicable” is a legally defined term that is assessed using the “reasonable person test”.

Factors Considered in Establishing a Due Diligence Defense

In determining whether your defence of “due diligence” is valid, a judge or jury considers three main factors:

- Foresee ability - could a reasonable person have foreseen that something could go wrong?
- Preventability - was there an opportunity to prevent the injury or incident?
- Control - who was the responsible person present who could have prevented the incident or accident?

Applicable legislation includes but is not limited to:

- Provincial Workplace Health and Safety Legislation.
- Federal and Provincial Transportation Legislation.
- Provincial Employment Standards.
- WHMIS.
- Provincial/Federal Environmental Legislation.
- ALL CSA standards which are referenced by anybody of legislation that applies to the Company.
- Provincial Jurisdictions.

3.2 - MANAGEMENT/LEADERSHIP COMMITMENT

PURPOSE

All personnel at **DEG ENGINEERING** are responsible for leading and engaging our workforce in meeting our Health and Safety requirements. It is the responsibility of all Managers to ensure they lead with positive Health and Safety behaviour through the setting of personal examples. Managers will be held accountable for achieving objectives and targets within their own areas of responsibility. The Company will measure performance through inspections, auditing, reviewing, reporting, and implementing continuous improvement initiatives. All personnel are required to display a professional, positive, cooperative, and friendly attitude towards customers, in all aspects of day-to-day business and operations.

THE COMPANY OVERALL COMPANY RESPONSIBILITIES ARE TO

- Ensure that the safety program and operations comply with contractual and regulatory requirements of WH&S in each provincial jurisdiction it does business.

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- Insist on safe performance throughout operations by ensuring employees and contractors are competent to do their job properly.
- Reinforce that “Health and Safety” is a prime consideration in its daily operations.
- Provide well-maintained equipment, machinery, and tools.
- Provide sufficient, adequate, and well-maintained PPE (Personal Protective Equipment).
- Comply with Prime Contractor’s site-specific safety plan.
- Provide sufficient time for employees and contractors to do their job properly.
- Ensure employees and contractors know the Company’s expectations and goals.
- Have an effective Health and Safety Program.
- Maintain, review, and update the health and Safety program annually.

3.3 - MANAGEMENT RESPONSIBILITIES

PURPOSE

The main requirements for those in management positions are to ensure that the Company will:

- Assess the risks to health and Safety of anyone who may be affected by their activities,
- Have adequate arrangements in place for planning, organizing, controlling, monitoring and review of safety measures that follow risk assessments.

Senior Managers

The Senior Managers at the company will be responsible for ensuring all levels of the company are taking on health and safety responsibilities that meet with Provincial legislation and company rules. Senior management will ensure that:

- Managers and Supervisors are responsible for the health and safety of employees under their direction.
- Managers and Supervisors treat employees with respect and ensure their psychological and physical well-being.
- Managers and Supervisors have the training required for their roles and responsibilities.
- Resources for health and safety are available.

Managers

The level of responsibility is directly linked to the level of control exercised. Each manager is responsible for those people and activities; they are expected to control and are accountable in law for their actions.

These responsibilities include, but are not limited to the following:

- Demonstrates a strong commitment to health, safety, and the environment by providing leadership regarding the use and application of the Company policies and work practices/procedures.
- Ensure all work refusals are acted on immediately and a report is written and investigated.
- Knowledgeable of, and responsible for, complying with all regulations, laws, and codes.
- Communicates the Company principles, policies, standards, and programs to all Company employees/contractors through field visits, memos, and participation in safety meetings.
- Ensuring Company, and contractor operations comply with Government Safety Legislation.
- Providing adequate supervision at every work site.
- Ensuring accidents and incidents are reported and investigated and corrective actions are taken.

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- Monitoring and supervising workers to ensure workers are not being harassed or violated by other workers in any way.
- Treat Workers and Contractors in a respectful manner without the use of bullying, harassment, or violent actions.
- Providing appropriate, well-maintained safety and other equipment required for each job.
- Ensuring workers are adequately qualified to perform their work.
- Ensuring training needs are identified and met.
- To review company safety, accident and investigation documentation for trends and input of preventative measures.
- Ensure that hazard assessments and inspections are carried out prior to the commencement of a project.
- Ensure all Supervisors are trained in their specific responsibilities, the Company Policies/Procedures, emergency planning and procedures and familiar with WH&S Regulations specific to the Company Operations in every jurisdiction the Company conducts business.

3.4 - SAFETY KEY PERSONNEL – SAFETY COMMITTEE MEMBER

PURPOSE

The company Safety Committee and/or key personnel responsible for health and safety requirements within the company shall have training for the following:

- Accident investigations.
- Formal inspections.
- Hazard identification and assessment.
- Work refusals.
- Workplace harassment and violence.

Maintain files for results of audits, inspections, incident and accident reports and investigations, and safety and environmental performance assessments. All files will be stored in the Company database and monitored for continuous updates/revisions. See the Safety Committee Section for further details.

3.5 - SUPERVISOR RESPONSIBILITIES

PURPOSE

The main requirement for those in supervisory positions is to ensure that all work under their control is performed in a healthy and safe manner. Each Supervisor is responsible for those people and activities they are expected to control and are accountable in law for their actions and ensure they know and apply the Company’s safety policy and relevant Provincial Workplace Health & Safety legislation. It is important that Supervisors ensure the health, safety, and well-being of all employees under their supervision and others present at the site where the work is being carried out and provide each employee with information about the hazards on the job and how to avoid them by doing the following:

- Complete Field Site Hazard Assessments before work begins on site.
- Conduct Toolbox Safety Meeting and include all employees and contractors under their direct supervision. The Pre-job meeting must address work to be done and any potential risks and/or hazards that may occur and ensure that corrective measures are taken, including disciplinary action to eliminate unsafe conditions or practices.

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- Ensure workers know what emergency response responsibilities are expected of them in case of an emergency.
- Ensure all workers under their supervision have the training and skills needed to perform the jobs that they will be performing on-site.
- Ensure personal protective equipment is available, in good condition, properly used, stored, maintained, and replaced when necessary.
- Ensure good housekeeping standards are in place for each work site/department.
- Ensure that workers are aware of OH&S Regulations and Codes and always follow company rules.
- Ensure that all accidents/incidents and “near misses” are reported and investigated.

3.6 - PRIME CONTRACTOR RESPONSIBILITIES

PURPOSE

A prime contractor is a chief contractor who has a contract with the owner of a project or job and has full responsibility for its completion. A Prime Contractor undertakes to perform a complete contract and may employ one or more contractors to carry out specific parts of the contract. Prime Contractors may also be called or referred to as the main contractor or principal contractor.

To correct the problems identified with the Principal Contractor concept, the Alberta Workplace Health and Safety Act was amended, and the concept of Prime Contractor was introduced. Specifically, the following amendments were added:

1. Every work site must have a prime contractor if there are 2 or more employers involved in work at the work site at the same time.
2. The prime contractor for a work site is:
 - The contractor, employer or other person who enters into an agreement with the owner of the work site to be the prime contractor.
 - If no agreement has been made or if no agreement is in force, the owner of the work site is the prime contractor.
 - If a work site is required to have a prime contractor under subsection (1), the prime contractor shall:
 - ensure, as far as it is reasonably practicable to do so, that this Act and the Regulations are complied with in respect of the work site.

The changes were intended to achieve the following:

- Ensure that one party at a work site has overall responsibility for maintaining a healthy and safe site.
- This party has been identified as the Prime Contractor.
- Owners, who may have limited capabilities of performing the Prime Contractor function, can assign Prime Contractor responsibilities to a party that is better equipped to manage those responsibilities.

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3.7 - CONTRACTOR SELF-EMPLOYED WORKER RESPONSIBILITIES

PURPOSE

It is the Contractor and/or Self-employed Worker's responsibility to ensure all persons working on the work site under their direction, have had a start-up meeting and have signed off the checklist as required. The following describes the contractor's responsibilities to prepare and supervise workers in such a manner to prevent unnecessary incidents/accidents or near-miss occurrences, as well as environmental impacts.

Any contractor or consultant who is hired to perform work on the Company facilities or equipment or on the Company's behalf, or any persons employed by that contractor or consultant has the responsibility of complying with the following requirements:

- To comply with all Federal, Provincial and the Company's safety rules, regulations, policies and procedures while working on the Company's facilities or equipment or on the Company's behalf.
- To ensure that they understand all requirements which are applicable to their work activity prior to commencing that activity. Where the contractor or consultant is unsure, they should contact the Company's HSE Department for clarification.
- Understand and obey all the Company's safety policies/procedures as described within the Health and Safety Program.
- Completing and submitting weekly inspection reports (if applicable) and incident/accident reports to the Company Supervisor. Incident/accident reports must be completed with recommendations for safety improvements.
- Ensure equipment is maintained in safe working condition prior to the start of any operation.
- Ensure their operations comply with contractual and regulatory requirements.
- Ensure insurance coverage meets or exceeds the Company's requirements.
- Maintain a WCB number and are in good standing with WCB in the province of operation.
- Actively participate in pre-job safety meetings and preparation and review of Safe Work Procedures (SWP)
- Report all potential hazards, unsafe work practices, accidents, incidents injuries, violations, and non-conformances to the appropriate supervisor.
- To ensure that no, illegal drugs, firearms, alcohol, fighting, stealing or willful damage are permitted anywhere.

3.8 - WORKERS RESPONSIBILITIES

PURPOSE

Every worker has basic rights, protected by law when it comes to Safety and health at the workplace. At the same time, every individual in the workplace has a personal responsibility to prevent occupational injuries and illness.

Every worker has the following rights:

- ✓ **The right to know** about hazards in the workplace, and what precautions must be taken to prevent injuries or illness from these hazards.
- ✓ **The right to participate** in the health and Safety program's continual improvement process and activities at the workplace.

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- ✓ **The right to refuse** any tasks that the worker has reasonable grounds to believe are dangerous to his or her Safety and health and the Safety and health of other persons.
- ✓ Workers carrying out duties or exercising rights, as set out under the Workplace Health and Safety Act, are protected from disciplinary action.

Worker Responsibilities

Taking reasonable care to protect themselves and others who may be affected by their actions or omissions.

Workers protect themselves, fellow workers, the public and the environment by:

- Demonstrating a strong commitment to health, Safety, and the environment by providing leadership regarding the use and application of the Company’s policies and work practices.
- Requesting a site orientation before he/she starts work.
- Treating other workers and contractors with respect and not engaging in any violent, bullying or harassment activity.
- Reporting to work in a fit and proper condition to work safely.
- Using required personal protective and safety equipment.
- Performing tasks that they are qualified for or under direct supervision.
- Being thoroughly familiar with the Company’s Health and Safety program.
- Actively participating in Safety program development and maintenance.
- Following Safety standards and safe work procedures set out by the Company, and regulatory requirements.
- Refusing to perform work when unsafe conditions exist (as defined in provincial workplace health and safety legislation) and refusing to perform work they are not competent to perform.
- Reporting potential hazards to supervisors.
- Immediately reporting to supervisors all accidents, incidents (near-misses), injuries and illnesses.
- Check equipment before using and never leave equipment running or unattended.
- Checking tools and equipment, including personal protective and safety equipment for hazards before using them.
- Knowing the emergency response and evacuation plan and the location of emergency equipment.

3.9 - VISITOR RESPONSIBILITIES

Visitors who are visiting with office employees must sign in at the front desk and be escorted to the employee’s office.

Visitors visiting high-hazard work sites or work areas (such as workshops) must have the permission of the site and/or shop supervisor, be escorted and wear the mandatory visitor PPE.

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SECTION 4 – HAZARD IDENTIFICATION & ASSESSMENT

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- 4.2 - HAZARD ELIMINATION AND CONTROL
- 4.3 - HAZARD ASSESSMENT PROCESS
- 4.4 - HAZARD COMMUNICATION
- 4.5 - EMPLOYEE/CONTRACTOR PARTICIPATION
- 4.6 - FIELD LEVEL HAZARD ASSESSMENTS
- 4.7 - HAZARD ASSESSMENT RISK RANKING
- 4.8 - RISK RANKING MATRIX TOOL
- 4.9 - HAZARD CONTROL ENFORCEMENT
- 4.10 - PERSONAL PROTECTIVE EQUIPMENT
- 4.11 - HAZARD ASSESSMENT OF STATIONARY AND MOBILE EQUIPMENT
- 4.12 – WORKPLACE VIOLENCE AND HARASSMENT POLICY, PREVENTION PLAN, HAZARD ASSESSMENT

4.1 - HAZARD IDENTIFICATION

PURPOSE

Health and Safety hazards exist in all workplaces. A hazard is any activity, situation or substance that can cause harm. Industry standards and current legislation require a health and Safety program that includes identification of existing and potential risks to the health and Safety of workers at the place of employment and the measures, including procedures to respond to an emergency that will be taken to reduce, eliminate or control those risks. A risk is the likelihood and consequences of an injury or harm occurring from exposure to the hazard. The combination of identifying hazards and assessing their risk is called risk analysis.

Hazard Assessments must be developed for all positions, job tasks, equipment and job sites for the Company and must identify both health and safety hazards, **including workplace harassment and workplace violence**. The Hazard Assessments must be evaluated to determine the overall level of risk and include prioritization of the risks involved. All workers will ensure that a Field Level Hazard Assessment is completed at each work site signed off by the on-site Supervisor and reviewed and signed off by the Management.

Hazard Assessments will be reviewed:

- On a regular basis to ensure procedures and conditions that have changed have not affected the hazard assessment and to prevent the development of unsafe working conditions, but at least annually.
- When there is a change to operations or work-related process.
- When a new work process is introduced.
- When new equipment is introduced.
- Prior to any new construction on site.
- When site-specific hazard assessments identify a new hazard.
- In response to inspections (FLHA) site-inspection identifying a new hazard.
- When an incident or accident occurs, and a new hazard is identified in the investigation.

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All employees working at the Company will notify their Supervisor/Management of any hazards observed at the work site. Hazards reports will be in writing, dated and signed by employees and will follow the guidelines found on the company’s “Hazard Identification Report”. Hazard reports will be investigated, and controls and elimination methods will be utilized. When a hazard is reported, the Supervisor/Management or a person assigned responsibility to correct the hazard will complete the hazard identification report form to ensure all necessary actions are taken; and follow-up actions are completed within a reasonable completion time.

4.2 - HAZARD ELIMINATION AND CONTROL

There are four methods of control:

1. Hazard elimination or substitution.
2. Engineering controls.
3. Administrative controls.
4. Personal protective equipment.

Hazard Elimination and/or Substitution

Whenever possible all hazards must be eliminated. It is important to look at all hazardous job tasks, equipment or environment and see if there is any possibility of eliminating the hazard. For example, smoking used to be a health hazard at most work sites, especially in confined areas such as the office. This health hazard has now been eliminated by provincial legislation banning smoking from all work sites, offices and anywhere that workers or the public may work or congregate.

Substitution should be looked at as a control method. For example, when using a toxic chemical look to see if you can’t substitute the toxic chemical for a less toxic or non-toxic chemical. Many painting companies are now using non-toxic paints to keep their employees from being exposed to respiratory health problems.

Engineering Controls

The next best strategy is to control the hazard at its source, eventually engineering out the hazard. Engineering controls do this, unlike other controls that generally focus on the employee exposed to the hazard. The basic concept behind engineering controls is for the work environment and the job itself to be designed to eliminate hazards or reduce exposure to hazards. Engineering Controls can be simple in some cases. They are based on the following principles:

- If practicable, design the facility, equipment, or process to remove the hazard or substitute something that is not hazardous or less hazardous.
- If removal is not practicable, enclose the hazard to prevent exposure in normal operations.
- Where complete enclosure is not possible, establish barriers or local ventilation to reduce exposure to the hazard in normal operations.

Examples of this control are:

- ✓ Installation of guards around moving machinery parts.
- ✓ Provision of ventilation equipment to remove toxic vapours.
- ✓ Installation of sound barriers.

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Administrative Controls

While safe work practices can be considered forms of administrative controls there are other measures aimed at reducing employee exposure to hazards. These measures include training, signs and company rules. These types of controls are normally used in conjunction with other controls that more directly prevent or control exposure to the hazard. Also included are specific approaches. For example, a job may be performed after hours to avoid exposing several workers to a hazardous situation.

Personal Protective Equipment (PPE)

The last line of defence in controlling hazards is the use of protective clothing or equipment (PPE), such as hard hats, steel-toed boots, eye protection, hearing protection, respirators, etc. Using PPE requires training on the part of the user and employees must be aware that the equipment does not eliminate the hazard. If the equipment fails, exposure will occur.

4.3 - HAZARD ASSESSMENT PROCESS

PURPOSE

Hazard assessments are an essential part of the Company’s safety management program. Hazard assessment methods will help reduce injuries and illnesses in the workplace. Hazard assessments will be conducted for the entire company as Formal Hazard Assessments. Field Site Hazard Assessments are conducted each time workers go out to a temporary/mobile work site, whether owned by the company or not. Hazard Assessment will also be conducted when a new activity is introduced temporarily to company-owned sites – such as the head office, warehouse, and shop.

The Company is committed to the following processes:

1. Assess a worksite and identify existing or potential hazards before work begins at the worksite.
2. Prepare a report including worker’s names and their participation in the reporting process of the results of a hazard assessment and the methods used to control or eliminate the hazards identified.
3. Ensure those employees involved in the hazard identification and assessment process have the required training necessary to ensure formal assessments are completed properly and to legislation requirements.

The elimination of the hazardous source may include:

1. Utilizing alternative methods, materials, or practices.
2. Discontinuation, removal or substitution of hazardous chemicals, materials, or substances.
3. Discontinuation or removal of hazardous equipment until replaced or repaired.
4. Correction by service, training or restriction of any unsafe conditions or existing work practice.

Hazard Assessments will be reviewed when:

1. On a regulator basis keep the results up to date.
2. When changes are made to the operation or work-related process.
3. When a new tool, machinery or equipment is introduced to the work site.
4. When site-specific hazard assessments identify a new hazard.
5. When an inspection identifies a new hazard.

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6. When an incident/accident investigation identifies corrective action using new control measures for a job, or when new hazards and risks previously not identified need to be included and evaluated.

Hazards must be identified if employees are to be protected from workplace hazards. A means of systematically identifying workplace hazards as they occur is needed so that hazards can be eliminated before accidents occur.

While you want to focus your prevention efforts prior to an incident occurrence, initially an analysis of past accident/incident history is beneficial. This type of analysis will enable you to identify the initial interventions that are needed.

DEG ENGINEERING Job Hazard Assessment (JHA) process is an intensive look at each job performed on a worksite, each piece of equipment used and the work environment. Each hazard will be evaluated separately and will be ranked according to probability and severity, and then the appropriate hazard control will be chosen.

4.4 - HAZARD COMMUNICATION

If new hazards are identified during the execution of the job tasks, the job must be stopped, and the new hazards must be documented on the JHA form. The new hazards and applicable controls needed to safely perform the job shall be identified and communicated to all personnel on location before the job task may resume. Distribution of these procedures will be as follows:

1. Posted in the site management office or office bulletin board.
2. Posted by contractors.
3. Discussed during orientation meetings for all site personnel, including contractors, prior to the commencement of work.
4. Discussed at safety meetings.

4.5 - EMPLOYEE/CONTRACTOR PARTICIPATION

The following responsibilities are expected from the Company, its employees, and contractors:

1. The Company will involve affected workers in the hazard assessment and in the control or elimination of the hazards identified.
2. The Company will ensure that workers affected by the hazards identified in a hazard assessment report are informed of the hazards and the methods used to control or eliminate the hazards.
3. The Company will ensure that key personnel with the company, including all Supervisors, are trained on hazard identification and risk assessment.
4. Supervisors are responsible for conducting ongoing formal hazard assessments of areas where their crews are working, or it is planned that they will be working.
5. Workers are responsible for participating in and contributing to the hazard assessment program.

If the contractor's HSE program is deficient in any areas, then they must be required to make modifications or adopt the site's program before starting work. All contractors need to understand the seriousness of

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our HSE program and that failure to comply with its requirements will be dealt with quickly and appropriately to include cancellation of the contract.

4.6 - FIELD LEVEL HAZARD ASSESSMENTS (FLHA)

It is the policy of this company that Field Level Hazard Assessments are conducted daily on all temporary work sites in the field and on clients' sites as well as company-owned worksites where conditions are regularly changing, or a temporary or new activity that could be hazardous takes place.

Field Level Hazard Assessments are conducted to:

- Identify hazards.
- Control hazards.
- Review existing hazards.
- Ensure current controls in place are effective.

Field Level Hazard Assessments are to be conducted by the worker(s) before work begins on site and reviewed and signed off by the Supervisor. Management is expected to participate in at least one Field Level Hazard Assessment in each area every six months. The Supervisor must have training in conducting Field Level Hazard Assessments.

All information gathered from the Field Level Hazard Assessments conducted must be provided for all affected employees. Industry standards and current legislation require that hazard assessments be completed for all tasks deemed hazardous by the Company employees and contractors at work sites.

- The Company's Supervisor(s) will assess a worksite and identify existing and potential hazards before work begins at the worksite.
- The Field Level Hazard Assessment (FLHA) shall be used when giving task instructions to employees and copies will be located at each work site for easy reference.
- Senior Management shall periodically audit the performance of supervisors in this program using task observations during tours and annual audits to measure overall performance.
- Managers will sign off on all Field Level Hazard Assessments.

The Company will ensure that the Field Level Hazard Assessment is repeated:

- At reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions,
- When a new work process is introduced,
- When a work process or operation changes,
- Before the construction of significant additions or alterations to a work site.

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4.7 - HAZARD ASSESSMENT RISK RANKING

Once hazards have been identified in employees:

1. Jobs (job tasks).
2. Hazardous tools, equipment and mobile equipment use.
3. Environment (office, shop, warehouse, field site).

The next step is to prioritize the hazards using a Risk Matrix and come up with a Risk Ranking Score for each 'position' at the Company. The Company is using a Risk Matrix tool that includes:

1. Frequency.
2. Severity.
3. Probability.

And control measures that include:

1. Engineering.
2. Administrative.
3. PPE.

Health Hazards

It is essential that potential health hazards are identified so they can be effectively controlled. Hazard identification must be accurate. Surveys, task observations and planned inspections can all support health hazard identification methods.

All occupations should be examined to identify and evaluate all occupational health hazards including:

- Physical (e.g., radiological, working at heights, lifting heavy loads, extreme temperatures, violence, ergonomics, noise, etc.).
- Chemical (e.g., fumes, vapours, gases, waste products, etc.).
- Radiation Hazards.
- Biological (e.g., bodily fluids, viruses, bacteria, moulds, etc.).
- Psychological (e.g., harassment and bullying, stress, fatigue, discrimination etc.).

Safety Hazards

Safety hazards are not always as obvious as one might think. Therefore, it is important for anyone involved in the identification and assessment of hazards to have formal training. Safety hazards can include:

- Slipping and tripping.
- Struck by objects (mobile equipment).
- Power tool use (debris hitting eyes and face, cuts to hands).
- Confined space entry (trenches).
- Trespassers (violence).
- Motor vehicle accident or breakdown.
- Fall from height (ladders, rooftops).
- Extreme weather (tornados).
- Crushing injuries (heavy objects falling).
- Workplace violence.

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4.8 - RISK RANKING MATRIX TOOL

Once all tasks/jobs have been identified within the position(s), the next step will be to identify the hazards associated with each of them. It is critical to clearly identify hazards to be able to assess the risks they pose and develop appropriate controls.

It is important to review hazards if an injury incident should occur to determine if the hazards have been properly risk-ranked and prioritized. Control measures will need to be reviewed to determine if they were being used at the time of the incident and if they have, must be reviewed with additional or increased control measures put in place.

RISK MATRIX- A Risk Matrix has been developed which includes Severity, Frequency and Probability risk scores. See Formal Hazard Assessments. All job positions, job tasks and hazardous equipment have been identified and given Risk Ranking Scores and then further the company has compiled Risk Rank Priority Scoring for all jobs and equipment. All employees must know the hazards of their jobs and view the Formal Hazard Assessments developed for their position which include the hazards in their jobs and review annually at a minimum.

A review of the Formal Hazard Assessments must be done; if any changes have been made to jobs, operations, environment they work in, or the equipment and tools that they use - but at least annually. Key persons in the Safety Committee and/or Company employees who know the position well can review and sign off on the Formal Hazard Assessments annually, however, the company must include employees in the process. Those conducting these reviews must have Formal Hazard Assessment Methods of Control training.

4.9 - HAZARD CONTROL ENFORCEMENT

It will be the responsibility of the Supervisor to monitor and check that all control measures put in place for job tasks and equipment are being used. Enforcement must be used immediately for any employee who is not complying with the control measures and should include verbal discussion, written warning, and possible termination of employment. (See disciplinary policy)

4.10 - PERSONAL PROTECTIVE EQUIPMENT

DEG ENGINEERING is committed to the health and safety of workers using personal protective equipment. Whenever possible, workplace hazards will be eliminated through engineering and administrative control measures. When it is determined that a work site hazard cannot be controlled through either of these measures, the use of personal protective equipment (PPE) will become mandatory.

All personal protective equipment purchased and used must meet government regulatory standards. For further information on this refer to the Alberta Occupational Health and Safety Regulations and Code. On that basis, the Company has identified that the following personal protective equipment may be required.

All equipment must be maintained and used according to the manufacturer's specifications. Any equipment not maintained to the manufacturer's specifications must be taken out of service and reported

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to the Supervisor who will then report to the Management immediately. PPE will not be modified or changed contrary to the manufacturer’s instructions or specifications. All employees will be trained in the care, maintenance, and use of personal protective equipment. (See training)

4.11 - HAZARD ASSESSMENT OF MOBILE AND STATIONARY EQUIPMENT

Mobile and stationary equipment must be inventoried and have a hazard assessment completed. The hazard assessment must include both health and safety risks. Each piece of equipment must have its own assessment and then reference the Formal Hazard Assessment for each position.

4.12 - HAZARD ASSESSMENT FOR WORKPLACE VIOLENCE AND HARASSMENT

Workplace Harassment and Violence Risk Assessment Process

The intent of this procedure is to ensure that workers' exposure to workplace harassment and violence is reduced or eliminated. The company is committed to reducing and eliminating Harassment / Violence in the workplace.

Key Responsibilities

Safety Manager

- The company will develop and implement a Workplace Harassment and Violence Program. The company has developed a policy and procedures respecting potential workplace violence in Alberta.

Site Manager

- Responsible for the implementation and maintenance of the plan for their site and ensuring all assets are made available for compliance with the plan.
- Enforcing immediate, and with no hesitation, steps to immediately address any incident of workplace Harassment and Violence.

Employees

- All employees shall be familiar with this procedure and the local workplace Harassment / Violence plan.
- Shall immediately report any exposure to or knowledge of workplace Harassment and Violence to their supervisor.

Workplace Harassment/Violence and Conduct Policy

Workers are informed of the company’s policies and procedures on Workplace Harassment and Violence. The employer must ensure that workers are instructed in how to recognize Workplace Harassment and Violence the policy, procedures, and workplace arrangements that effectively minimize or eliminate workplace violence the appropriate response to workplace violence, including how to obtain assistance and procedures for reporting, investigating and documenting incidents of workplace violence.

The employer must ensure, so far as is reasonably practicable, that no worker is subjected to violence or harassment in the workplace and ensure corrective action is taken respecting any person under our direction who subjects a worker to violence.

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All managers, supervisors and workers are responsible for implementing and maintaining our WVPP Program. We encourage worker participation in designing and implementing our program. We require prompt and accurate reporting of all violent incidents whether physical injury has occurred. We will not discriminate against victims of workplace violence.

A copy of the workplace harassment/violence policy must be posted in the workplace, and it must post a copy of the harassment/violence prevention policy in a conspicuous place at the workplace and be readily available to all workers.

Our plan ensures that all workers, including supervisors and managers, adhere to work practices that are designed to make the workplace more secure and do not engage in verbal threats or physical actions which create a security hazard for others in the workplace. All workers, including managers and supervisors, are responsible and accountable for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe and secure work environment.

The management of our establishment is responsible for ensuring that all safety and health policies and procedures involving workplace security are clearly communicated and understood by all workers. Managers and Supervisors are expected to enforce the rules fairly and uniformly. The Plan will be reviewed and updated annually.

Definition: (source: OHS Act)

“**Violence**”, whether at a work site or work-related, means the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, and includes domestic or sexual violence.

“**Harassment**” means any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person that the person knows or ought reasonably to know will or would cause offence or humiliation to a worker, or adversely affect the worker’s health and safety, and includes: (a) conduct, comment, bullying or action because of race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation, and (b) a sexual solicitation or advance, but excludes any reasonable conduct of an employer or supervisor in respect of the management of workers or a work site.

Employees

- The company must inform workers who may be exposed to the risk of harassment or violence of the nature and extent of the risk. The duty to inform workers includes a duty to provide information when a risk of harassment or violence is identified related to the risk of harassment or violence from other known persons who have a known history of violent behaviour and/or whom workers are likely to encounter in the course of their work.
- The company will ensure that workers are instructed in how to recognize workplace harassment and violence, the policy, procedures and workplace arrangements that effectively minimize or eliminate workplace violence, the appropriate response to workplace violence, including how to

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obtain assistance and procedures for reporting, investigating and documenting incidents of workplace violence.

Risk Assessment

A risk assessment must be conducted to evaluate the risk of workplace violence. The company must identify and assess the risk of harassment and violence in the workplace in consultation with the committee at the workplace, the representative at the workplace or when there is no committee or representative, the workers at the workplace.

Workplace Hazard Control and Prevention

The company will identify and institute a combination of control measures designed to eliminate or mitigate the risks of violent incidents. Traditional methods of engineering and administrative controls include the following:

Engineering Controls

Engineering controls to consider for the local workplace violence plan include:

- Is lighting adequate to eliminate dark areas and heavy shadows and deter potential incidents from occurring?
- Are adequate escape and access routes present and known to the workers?
- Are all unused doors locked to limit access?
- Is access to work areas controlled and are there access procedures established for visitors?
- Is there a list of "restricted visitors" or trespassers and is it maintained?
- Is entry to the area/building controlled with carded entry or security staff?
- Are physical security devices required (e.g., Closed Circuit TV, door locks, panic alarms)?
- Is there an effective means of communication between the worker and persons capable of responding to the worker's needs?

Administrative Controls

Administrative controls to consider for the local workplace violence plan include:

- Are the duties that create a safety risk necessary? Can modification or elimination of these duties be made?
- Are work procedures developed?
- Is staff trained in work procedures?
- Is there sufficient and qualified staff coverage during times of greater risk?
- Can staff double up for specific locations or situations where the probability of violence is higher?
- Can money handling be reduced or improved?
- Has the local workplace Working Alone Plan factored in workplace violence threats?
- Is an escort or buddy service required for workers working after hours?
- Can hours of operation be modified to close the workplace to the public during high-risk hours (late at night and early in the morning)?

Compliance

All workers are responsible and will be held accountable for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe and secure work environment.

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A person must not engage in any improper activity or behaviour at a workplace that might create or constitute a hazard to themselves or to any other person. Improper activity or behaviour must be reported and investigated.

Managers, supervisors and workers will comply with work practices that are designed to make the workplace more secure and will not engage in threats or physical actions which create a security hazard for others in the workplace. Managers and supervisors will:

- Inform workers, supervisors and managers about our Workplace Harassment and Violence Prevention Program.
- Evaluate the performance of all workers in complying with our establishment’s workplace security measures.
- Recognize workers who perform work practices which promote security in the workplace.
- Provide training and/or counselling to workers who need to improve work practices designed to ensure workplace security.
- Discipline workers for failure to comply with workplace security practices.
- Follow established workplace security directives, policies and procedures.

Managers and supervisors will maintain an open, two-way communications system on all workplace safety, health and security issues. Our establishment has a communication system designed to encourage a continuous flow of safety, health and security information between management and our workers without fear of reprisal and in a form that is readily understandable. Our communication system consists of the following items:

- New worker orientation on our establishment’s workplace security policies, procedures and work practices.
- Periodic review of our Workplace Violence Prevention Program with all personnel.
- Training programs designed to address specific aspects of workplace security unique to our establishment.
- Regularly scheduled safety meetings with all personnel including workplace security discussions.
- A system to ensure that all workers, including managers and supervisors, understand the workplace security policies.
- Posted or distributed workplace security information.
- A system for workers to inform management about workplace security hazards or threats of violence.
- Procedures for protecting workers who report threats from retaliation by the person making the threats.

Workplace Security Inspections

Inspections to identify and evaluate workplace security hazards and threats of workplace violence will be performed on the following schedule:

- Monthly
- When new, previously unidentified security hazards are recognized
- When occupational injuries or threats of injury occur, and
- Whenever workplace security conditions warrant an inspection.

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Periodic inspections for security hazards consist of the identification and evaluation of workplace security hazards and changes in worker work practices and may require assessing for more than one type of workplace violence. Our establishment performs inspections for each type of workplace violence by using the methods specified below to identify and evaluate workplace security hazards.

By Strangers

- The exterior and interior of the workplace for its attractiveness to robbers.
- The need for security surveillance measures, such as mirrors or cameras.
- Posting of signs notifying the public that limited cash is kept on the premises.
- Procedures for worker response during a robbery or other criminal act.
- Procedures for reporting suspicious persons or activities.
- Posting of emergency telephone numbers for law enforcement, fire and medical services where workers have access to a telephone with an outside line.
- Limiting the amount of cash on hand and using time access safes for large bills.
- Staffing levels during evening hours of operation and at other high-risk times.
- The use of work practices such as "buddy" systems, as appropriate, for identified risks (e.g., walking workers to their cars or mass transit stops at the end of the workday).
- Adequacy of lighting and security for designated parking lots or areas

By Clients

- Access to and freedom of movement within, the workplace.
- Adequacy of workplace security systems, such as door locks, security windows, physical barriers and restraint systems.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
- Employees' skill in safely handling threatening or hostile service recipients.
- Effectiveness of systems and procedures to warn others of a security danger or to summon assistance e.g. alarms or panic buttons.
- The use of work practices such as "buddy" systems, as appropriate, for identified risks (e.g., walking workers to their cars or mass transit stops at the end of the workday).
- Adequacy of lighting and security for designated parking lots or areas.
- The availability of worker escape routes.

By Co-Workers

- How well our establishment's anti-violence policy has been communicated to workers, supervisors and managers.
- How well our establishment's management and workers communicate with each other.
- How well our workers, supervisors and managers know the warning signs of potential workplace violence.
- Access to and freedom of movement within, the workplace by non-workers, specifically recently discharged workers.
- Frequency and severity of worker-reported threats of physical or verbal abuse by managers, supervisors or other workers.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.

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- Employee disciplinary and discharge procedures.

Personal Relations

- Access to and freedom of movement within, the workplace by non-workers, specifically personal relations with whom one of our workers is having a dispute.
- Frequency and severity of worker-reported threats of physical or verbal abuse which may lead to violent acts by a personal relation.
- Adequacy of workplace security systems, such as door locks, security windows, and physical barriers.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs.
- The use of work practices such as "buddy" systems, as appropriate, for identified risks (e.g., walking workers to their cars or mass transit stops at the end of the workday).
- Adequacy of lighting and security for designated parking lots or areas.
- Warnings or police involvement to remove personal relations of workers from the worksite and effectiveness of restraining orders.
- All workers who obtain a protective restraining order, which lists company or client premises as being a protected area, must provide to their immediate supervisor a copy of any temporary or permanent protective or restraining order.
- The company understands the sensitivity of the information requested and has developed confidentiality procedures, which recognize and respect the privacy of the worker(s).

Physician Consulting

Victims of workplace violence are advised to consult a health professional. The company must ensure that a worker is advised to consult a health professional of the worker's choice for treatment or referral if the worker reports an injury or adverse symptom resulting from workplace violence or is exposed to workplace violence.

Reporting and Investigation Procedure

Incidents of workplace violence must be reported and investigated. The following provides information on how to report an incident of violence and how an incident of violence will be investigated:

- In the event of a workplace violence-related incident any worker shall immediately contact the client or contracted security staff, local law enforcement agencies and the corporate Human Resources department.
- The worksite will strictly follow company policies and procedures for a thorough investigation of the incident.
- The Human Resources department shall lead the investigation with the assistance of those parties designated by the Human Resources department.

Investigation

Our procedures for investigating incidents of workplace violence—threats and physical injury—include:

- Reviewing all previous incidents.
- Visiting the scene of an incident as soon as possible.
- Interviewing threatened or injured workers and witnesses.

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- Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behaviour by the perpetrator.
- Determining the cause of the incident.
- Taking corrective action to prevent the incident from recurring.
- Recording the findings and corrective actions taken.

Training and Instruction

Workers are provided with workplace violence training. When a risk of violence in the workplace is identified the company must train workers in the violence prevention policy. We have established the following policy on training all workers with respect to workplace violence and security.

All workers, including managers and supervisors, shall have training and instruction on general and job-specific workplace security practices. Training and instruction shall be provided when the Workplace Violence Prevention Program is first established and periodically thereafter. Training shall be provided to all new workers and to other workers for whom training has not previously been provided. It shall also be provided to all workers, supervisors, and managers given new job assignments for which specific workplace security training for the job assignment has not previously been provided. Additional training and instruction will be provided to all personnel whenever the company is made aware of new or previously unrecognized security hazards.

General workplace violence and security training and instruction include, but are not limited to, the following:

- Explanation of the Workplace Violence Prevention Program including measures for reporting any violent acts or threats of violence.
- Recognition of workplace violence and security hazards including the risk factors associated with the types of violence.
- The policy, procedures, and workplace arrangements that effectively minimize or eliminate workplace violence.
- Ways to defuse hostile or threatening situations.
- Measures to summon others for assistance.
- Employee routes of escape.
- Notification of law enforcement authorities when a criminal act may have occurred.
- Emergency medical care is provided in the event of any violent act upon a worker.
- Post-event trauma counselling for those workers desiring such assistance.
- Personal security measures
- Ways of preventing or diffusing volatile situations or aggressive behaviour
- How to deal with hostile persons
- Techniques and skills to manage and resolve conflicts
- The importance of reporting, how to report incidents, and who to contact for support for assistance
- Specific instructions to all workers regarding workplace security hazards unique to their job assignment, to the extent that such information was not already covered in other training.

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Supervisory and Safety Staff Training

- Methods to encourage workers to report incidents of violence
- Methods to support workers who report incidents
- Skill in handling crisis situations, identifying the warning signs of aggression
- Techniques and skills to manage and resolve conflicts
- Identifying precipitating factors (e.g., mental health issues, workplace stress, substance abuse)

Program Recordkeeping and Review

The company will review the violence and harassment prevention plan as required by Alberta OHS Legislation (390.7(1):

- (a) When an incident of violence or harassment indicates a review is required;
- (b) Where there is a change to the work or work site that could affect the potential for violence or harassment to occur;
- (c) If the joint health and safety committee or the health and safety representative requests a review;
- (d) At least every 3 years.

The review will include:

- Workplace violence incident reports
- Information compiled for recording assault incidents or near-assault incidents (i.e. Threat & Assault Log)
- Insurance records
- Police reports
- Workplace survey
- Accident investigations
- Training records
- Grievances
- Inspection information
- Other relevant records or information

Each worksite shall perform an annual review of the local worksite violence plan (in conjunction with the local Joint Health and Safety Committee) for improvement to the plan. A copy of the revised plan shall be forwarded to the Safety Manager.

VIOLENCE PREVENTION POLICY

The management of **DEG ENGINEERING** recognizes the potential for workplace violence and has developed and implemented the plan in consultation with the joint work site health and safety health and safety committee and with the worker safety representative.

Alberta OH&S states that violence, whether at the work site or work-related, is defined as the threatened, attempted, or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm it can include:

- Physical attack or aggression.
- Threatening behaviour.

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- Verbal or written threats.
- Domestic violence.
- Sexual violence.

Domestic Violence – Becomes a workplace hazard when it occurs or spills over into the workplace. It may put the targeted worker at risk and may pose a threat to coworkers. Employers must take reasonable precautions to protect affected workers if they are likely to be exposed to domestic violence at a work site.

Sexual Violence – Sexual violence as a workplace hazard refers to any sexual act, attempt to obtain a sexual act, or other act directed against a worker’s sexuality using coercion, by any person regardless of their relationship to the victim, in a workplace or work-related setting. Sexual violence exists on a continuum from obscene name-calling to sexual assault and/or homicide. It includes online forms of sexual violence, such as internet threats harassment and sexual exploitation.

The Company is committed to providing our employees/contractors with an appropriate level of protection from the hazards associated with workplace violence to eliminate or at least control violence. Acts of violence can take the form of physical contact. Workers are encouraged to exercise their rights in reporting any type of workplace violence to the company.

VIOLENCE PREVENTION POLICY

The management of this company is committed to preventing workplace violence and is ultimately responsible for worker health and safety. We will take whatever steps are reasonable to protect our workers from the potential hazards associated with workplace violence. Violent behaviour or threat of violence in the workplace is unacceptable to anyone. This policy applies to all employees of the company as well as external clients/customers.

The company is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of violence. Everyone must uphold this policy and work together to prevent workplace violence. Violence, whether at a work site or work-related, is the threatened, attempted, or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm and includes domestic or sexual violence.

In support of this policy, we have put in place workplace violence prevention procedures with the consultation of the Health and Safety Committee and/or HSE Rep. These include measures and procedures to protect workers from workplace violence, a means of summoning immediate assistance, and a process for workers to report incidents or raise concerns.

The employer will ensure this policy and the supporting procedures are implemented and maintained. All workers and supervisors will receive relevant information and instruction on the contents of the policy and procedures.

Supervisors will adhere to this policy and the supporting procedures. Supervisors are responsible for ensuring that workers follow measures and procedures and have the information they need to protect themselves.

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Every worker must work in compliance with this policy and the supporting procedures. All workers are required to raise any concerns about workplace violence and to report any violent incidents or threats. The employer will investigate and take appropriate corrective actions to address all incidents and complaints of workplace violence in a fair and timely manner.

The employer pledges to respect the privacy of all concerned as much as possible. The employer will not disclose the circumstances related to an incident of violence, or the names of the complainant, the person alleged to have committed the violence, and any witnesses, except where necessary to:

- investigate the incident or to take corrective action,
- inform the parties involved in the incident of the results of the investigation and any corrective actions taken,
- inform workers of a specific or general threat of violence or potential violence, or
- comply with other legal requirements.

The employer will disclose only the minimum amount of personal information required that is necessary to inform workers of a specific or general threat of violence or potential violence. No workers can be penalized, reprimanded or in any way criticized when acting in good faith while following this policy and the supporting procedures for addressing situations involving workplace violence. This violence prevention policy does not discourage a worker from exercising the worker's right under any other law.

VIOLENCE AND HARASSMENT PREVENTION PROCEDURES

The company will adhere to all Alberta OHS legislation around Violence and Harassment in the workplace and will include the following:

Violence and harassment prevention plan

390(1) An employer must develop and implement a violence and harassment prevention plan that includes the following:

- (a) measures to eliminate or, if that is not reasonably practicable, control the hazards of violence and harassment to workers;
- (b) any applicable requirement referred to in section 392.2;
- (c) procedures to inform workers of the nature and extent of the hazard of violence and harassment, including information related to specific or general threats of violence or harassment that exist or may exist;
- (d) procedures to report violence or harassment;
- (e) procedures to investigate complaints and incidents of violence or harassment;
- (f) provisions to protect the confidentiality of all parties involved in a complaint or incident, except where disclosure is
 - (i) necessary to
 - (A) investigate the complaint or incident,
 - (B) take corrective action, or
 - (C) inform the parties involved in the complaint or incident of the results of the investigation and of any corrective action to be taken to address the complaint or incident,

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- (ii) necessary to inform workers of a specific or general threat of violence or potential violence, or
- (iii) required by law.

390.7 (1) An employer must review the violence and harassment prevention plan required by the section.

390(1) in any of the following circumstances:

- (a) when an incident of violence or harassment indicates a review is required;
- (b) where there is a change to the work or work site that could affect the potential for violence or harassment to occur;
- (c) if the joint health and safety committee or the health and safety representative requests a review;
- (c) at least every 3 years.

390.7(2) When carrying out the review required by subsection (1), the employer must consult with;

- (a) the joint health and safety committee, if there is one,
- (b) the health and safety representative, if there is one, or
- (c) affected workers, as far as reasonability practicable to do so, if there is no joint health and safety committee or health and safety representative.

390.7(3) The employer must revise the violence and harassment prevention plan as necessary following a review required under subsection (1).

How to Report Workplace Violence

- The employee reporting process for reporting workplace violence will be dependent on the level of violence encountered by the employee.
- Employees who are alone or not in the office environment at the time of the incident will immediately contact outside emergency services such as (911) and stay in a well-protected area (locked car or public place).
- Employees who are working around others on the work site will report the incident immediately to the site Prime Contractor, Safety personnel and our office HR department and/or safety committee.
- Employees who encounter a violent event in the office are to immediately report all workplace violence complaints to their immediate report/supervisor and depending on the level of the violence, outside emergency services will be contacted.
- In the event that the incident involves the employee's immediate report/supervisor the employee will report directly to HR and/or safety committee.

Procedure - Dealing with a Workplace Violence Complaint

- All reported complaints will be reviewed and investigated immediately (within 24 hours).
- Once a complaint is received, it will be kept strictly confidential. An investigation will be undertaken immediately, and all necessary steps taken to resolve the problem. If appropriate, action taken may include conciliation.

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- Both the complainant and the alleged violator will be interviewed, as will any individuals who may be able to provide relevant information. All information will be kept in confidence.
- If the investigation fails to find evidence to support a complaint, there may be documentation concerning the complaint and filed in good faith, whether the complaint is upheld or not.
- Regardless of the outcome of a violence complaint made in good faith, the employee lodging the complaint, as well as anyone providing information will be protected from any form of retaliation by either co-workers or superiors. This includes dismissal, demotion, unwanted transfer, and denial of opportunities within the Company or of an individual because of her/his having made a complaint or having provided evidence regarding the complaint.
- Results of the investigation will be communicated to both the complainant and alleged harasser and corrective action put in place.

Workplace Violence Investigation Process/Steps

- The company's safety committee, in coordination with management/HR will be responsible for investigating an incident of violence. Only those persons(s) who have investigation training which includes workplace violence training will be allowed to lead the investigation process.
- As per the Incident Investigation process/policy all workplace violence investigations will involve finding the cause, and root cause and implementing corrective action and controls as appropriate.
- Communication to company employees regarding workplace violence encounters reported and investigation results will be the responsibility of the senior management team and all names of the persons involved kept strictly confidential.
- The parties involved in the workplace violence event will be informed of the results of the investigation and corrective actions put in place.
- Depending on the level of workplace violence – occupational health and safety and/or other outside emergency services (police) may need to be notified and be involved in part or in the whole investigation process.

Communication of Violence to Workers

The Company will ensure to communicate the violence hazards to workers as soon as practicable while complying with OHS Code Sections 390.1 (c) and (d):

- (c) a statement that the employer will not disclose the circumstances related to an incident of violence or the names of the complainant, the person alleged to have committed the violence and any witnesses, except (i) where necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident, (ii) where necessary to inform workers of a specific or general threat of violence or potential violence, or (iii) as required by law.
- (d) a statement that the employer will disclose only the minimum amount of personal information under clause (c)(ii) that is necessary to inform workers of a specific or general threat of violence or potential violence.

Communication(s) will include emails to all employees about the incident, where the incident occurred and that the reported violence is under investigation and results from the investigation will be reported to all employees with preventative measures established.

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Hazard Assessment for Violence

The company will ensure that a hazard assessment has been completed to eliminate or control the hazard of violence in the workplace. The hazard assessment will include hazards associated with violence as a safety hazard and control measures that include illimitation, engineering, administrative etc.

Informing the Parties Involved in the Incidence of Violence

The procedure to be followed by the employer when informing the parties involved in an incident of violence:

- a) the results of an investigation of the incident, and
- b) any corrective action to be taken to address the incident.

Workplace Violence Treatment

Any employee reporting an injury or adverse symptom resulting from an incident of violence is advised to consult a health professional of the worker's choice for treatment or referral.

Workplace Violence and Harassment Policy Review

The workplace violence policy and procedures must be reviewed:

- when an incident occurs related to violence or harassment.
- where there is a change to the work or work site that could affect the potential for violence or harassment to occur
- if the HSC or HS representative recommends a review.
- at least every 3 years.

Investigation of Workplace Violence Complaints

Management Responsibilities

1. Inform employees/contractors if they are working in an area where there is potential for violence and identify any risks that are specific to that area.
2. Ensure that appropriate procedures are in place to minimize the risk to Employees and/or contractors from violence.
3. Ensure that employees/contractors are trained in recognizing and responding to situations involving workplace violence.
4. Ensure that every reported incident of workplace violence is investigated and potential areas for improvement are identified.
5. The Company and management are committed to maintaining the confidentiality of personal information of those involved, where appropriate.

Employee and/or Contractor Responsibilities

1. Employees/contractors are required to be familiar with and follow the procedures that are in place to protect them from workplace violence.
2. All employees/contractors must participate in the instruction of workplace violence prevention.
3. Employees/contractors are required to immediately report all incidents of workplace violence to their immediate Supervisor.

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4. Employees/contractors are also responsible for participating in worksite hazard assessments and implementing controls and procedures to eliminate or control the associated hazards.
5. No employee/contractor can be penalized, reprimanded, or in any way criticized when acting in good faith while following the procedures for addressing situations involving workplace violence.
6. Employees will find supporting documents and forms in the Health and Safety Binder under (forms).

Training

As part of the Company's commitment to preventing workplace violence, training will be included as a part of the orientation which will include:

- How to recognize workplace violence.
- the policy, procedures and workplace arrangements that effectively minimize or limit workplace violence.
- the appropriate response to workplace Violence, including how to obtain assistance, and Procedures for reporting, investigating and documenting incidents of workplace violence.
- the hazards related to specific, general, or potential violence.
- eliminating or controlling the hazard of violence.
- how to obtain immediate assistance when an incident of violence occurs.
- how to report violence.
- investigating an incident of violence and implementing controls as appropriate.
- informing the parties involved of the results of the investigation, and corrective actions.

2.9 - HARASSMENT POLICY

DEG ENGINEERING is committed to providing a work environment in which all workers are treated with respect and dignity. Harassment will not be tolerated by anyone including all employees at the company, its clients, contractors, and visitors.

The Company will eliminate or, if that is not reasonably practicable, control the hazard of harassment. Everyone must uphold this policy and work together to prevent workplace harassment.

Workplace harassment means any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person that the person knows or ought reasonably to know will or would cause offence or humiliation to a worker, or adversely affect the worker’s health and safety. Workplace harassment includes conduct, comment, bullying or action because of race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation, and a sexual solicitation or advance.

Reasonable action taken by the employer or supervisor relating to the management and direction of workers or a work site is not workplace harassment.

In support of this policy, we have put in place workplace harassment prevention procedures with the consultation of the Health and Safety Committee and/or HSE Rep. These include measures and

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procedures to protect workers from the hazard of harassment and a process for workers to report incidents or raise concerns.

The employer will ensure this policy and the supporting procedures are implemented and maintained. All workers and supervisors will receive relevant information and instruction on the contents of the policy and procedures.

Supervisors will adhere to this policy and the supporting procedures. Supervisors are responsible for ensuring that workers follow measures and procedures and have the information they need to protect themselves.

Every worker must work in compliance with this policy and the supporting procedures. All workers are required to raise any concerns about harassment and to report any incidents to the appropriate person. The employer will investigate and take appropriate corrective actions to address all incidents and complaints of workplace harassment in a fair, respectful, and timely manner.

The employer pledges to respect the privacy of all concerned as much as possible. The employer will not disclose the circumstances related to an incident of harassment, or the names of the parties involved (including the complainant, the person alleged to have committed the harassment, and any witnesses) except where necessary to:

- investigate the incident or to take corrective action,
- inform the parties involved in the incident of the results of the investigation and any corrective actions taken, or
- comply with other legal requirements.

No workers can be penalized, reprimanded or in any way criticized when acting in good faith while following this policy and the supporting procedures for addressing situations involving harassment. This harassment prevention policy does not discourage a worker from exercising the worker's right under any other law, including the *Alberta Human Rights Act*.

HARASSMENT PREVENTION PROCEDURES

DEG ENGINEERING is committed to a healthy, harassment-free work environment for all our employees/contractors. The Company is committed to eliminating or at least controlling workplace harassment and encourages all workers to report any type of workplace harassment immediately to their direct Supervisor/Manager. All workplace harassment reports and investigations will be held and maintained in confidentiality by the company. This workplace harassment policy is not intended to discourage a worker from exercising the worker's rights pursuant to any other law. The company shall:

- define workplace harassment in all forms, including domestic and sexual harassment.
- committed to eliminating or, if that is not reasonably practicable, controlling the hazard of workplace harassment.
- will investigate all incidents of workplace harassment and take corrective action to address the incidents.
- will ensure not to disclose the circumstances related to an incident of harassment or the names of the complainant, the person alleged to have committed the harassment, and any witnesses,

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except where necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident or where necessary to inform workers of a specific or general threat of violence or potential violence or as required by law

- the workplace harassment prevention policy is not intended to discourage a worker from exercising the worker’s rights pursuant to any other law, including the Alberta Human Rights Act.
- the company will develop separate violence and harassment prevention plans.
- the company will review both workplace harassment plans at least once every 3 years.
- the company will have an appeal process for workers disciplined for bringing harassment issues forward.
- the company will advise workers of treatment options if harmed by harassment; workers are entitled to wages and benefits while attending treatment programs. Workers are advised to consult a health professional of the worker’s choice for treatment or referral when an injury or adverse symptom results from an incident of violence or harassment.

How to Report Workplace Harassment

- Employees who have experienced workplace harassment are encouraged to report the event immediately to their manager/supervisor.
- If the incident involves the employee’s immediate report/supervisor, the employee will report directly to HR and/or the safety committee.
- All workplace harassment events will be reviewed and investigated in a timely manner but within one week of the event.
- Reported workplace harassment events will be communicated to employees by senior management and names of the person(s) involved will be kept confidential.

Procedure - Dealing with a Complaint

- Once a complaint is received, it will be kept strictly confidential. Depending on the nature of the harassment, documenting a complaint to immediate action will take place.
- An investigation will be undertaken immediately, and all necessary steps taken to resolve the problem. If appropriate, action taken may include conciliation.
- Both the complainant and the alleged harasser will be interviewed, as will any individuals who may be able to provide relevant information. All information will be kept in confidence.
- If the investigation fails to find evidence to support a complaint, there may be documentation concerning the complaint and filed in good faith, whether the complaint is upheld or not.
- Regardless of the outcome of a harassment complaint made in good faith, the employee lodging the complaint, as well as anyone providing information will be protected from any form of retaliation by either co-workers or superiors. This includes dismissal, demotion, unwanted transfer, denial of opportunities within the Company or harassment of an individual because of her/his having made a complaint or having provided evidence regarding the complaint.
- Results of the investigation will be communicated to both the complainant and the alleged harasser.

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Workplace Harassment Investigation Process/Steps

- The company's safety committee, in coordination with management/HR will be responsible for investigating an incident of harassment. Only those persons(s) who have investigation training which includes workplace harassment training will be allowed to lead the investigation process.
- As per the Incident Investigation process/policy all workplace harassment investigations will involve finding the cause, and root cause and implementing corrective action and controls as appropriate.
- Communication to company employees regarding workplace harassment encounters reported and investigation results will be the responsibility of the senior management team and all names of the persons involved kept strictly confidential.
- The parties involved in the workplace harassment event will be informed of the results of the investigation, and corrective actions put in place.

Informing the Parties Involved in the Incidence of Violence

The procedure to be followed by the employer when informing the parties involved in an incident of harassment of:

- a) the results of an investigation of the incident, and
- b) any corrective action to be taken to address the incident.

Definition of Harassment

Harassment occurs when an employee/contractor is subjected to unwelcome verbal or physical conduct because of race, religious beliefs, colour, place of origin, gender, mental or physical disability, ancestry, marital status, family status or source of income. Alberta Human Rights laws prohibit harassment in the workplace on these grounds. Workplace harassment includes violence in all forms, including domestic and sexual violence.

Examples of harassment, which will not be tolerated at the Company are:

Verbal or physical abuse, threats, derogatory remarks, innuendo or taunts about any employee's appearance, religious beliefs, colour, place of origin, mental or physical disabilities, ancestry, marital status, family status, source of income or gender.

Intimidation, leering or other objectionable gestures; condescension or paternalism that undermines self-confidence, and unwanted physical contact such as touching, patting, pinching, or punching are all examples of harassment.

Race and Religious Harassment

Derogatory comments, taunts, threats, jokes, teasing or jeering about race, colour, national or ethnic origins, or about adornments and rituals associated with cultural or religious beliefs: these are all forms of harassment when they occur in areas protected under the Act.

Discrimination occurs if the onus is on the person experiencing the harassment to inform the harasser that the behaviour is unwelcome.

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Definition of Sexual Harassment

Deliberate, unsolicited, or unwelcome conduct, comment, gesture or contact of a sexual nature that is likely to cause offence/humiliation to an employee or perceived by that employee as placing a condition of a sexual nature on employment, work assignment, or on any opportunity for training/promotion. Sexual harassment, being discrimination on the grounds of gender, is a violation of the Human Rights, Citizenship, and Multiculturalism Act.

Workplace Harassment Treatment Policy

Any employee reporting an injury or adverse symptom resulting from an incident of harassment is advised to consult a health professional of the worker's choice for treatment or referral.

Responsibility of Management

It is the responsibility of a Director, Management, or any person within this company to take immediate and appropriate action to report or deal with incidents of harassment of any type whether brought to their attention or personally observed. Under no circumstances should a legitimate complaint be dismissed or downplayed, nor should the complainant be told to deal with it personally. Management will review the workplace harassment plan at least every three years to ensure that it is working and compliant with OH&S Regulations and Codes.

The harassment policies and procedures must be reviewed:

- when an incident occurs related to harassment; or
- if the HSC or HS representative recommends a review; or
- where there is a change to the work or work site that could affect the potential for violence or harassment to occur, or
- at least every 3 years.

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SECTION 5 – PERSONAL PROTECTIVE EQUIPMENT

5.0 - PERSONAL PROTECTIVE EQUIPMENT INDEX

- 5.1 - PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY
- 5.2 - PERSONAL PROTECTIVE EQUIPMENT STANDARDS
- 5.3 - PPE REQUIREMENTS, CARE AND MAINTENANCE
- 5.4 - PERSONAL PROTECTIVE EQUIPMENT TRAINING
- 5.5 - PERSONAL PROTECTIVE EQUIPMENT ENFORCEMENT
- 5.6 - PPE PREVENTATIVE MAINTENANCE PROGRAM

5.1 - PERSONAL PROTECTIVE EQUIPMENT POLICY

DEG ENGINEERING is committed to the health and safety of workers using personal protective equipment. Whenever possible, workplace hazards will be eliminated through engineering and administrative control measures. When it is determined that a work site hazard cannot be controlled through either of these measures, the use of personal protective equipment (PPE) will become mandatory.

It will be the responsibility of the Supervisor to monitor and check that all control measures put in place for job tasks and equipment are being used. Enforcement must be used immediately for any employee who is not complying with the control measures and should include verbal discussion, written warning, and possible termination of employment. (See disciplinary policy)

Where there is, or may be, danger to a worker, it is the employer’s responsibility to ensure that required PPE is used and it is all the worker’s responsibility to comply with the employer’s requirement. The Company will take reasonable steps to enforce the use of the required PPE in compliance with this policy.

All personal protective equipment purchased and used must meet government regulatory standards. For further information on this refer to the Alberta Occupational Health and Safety Regulations and Code. On that basis, the Company has identified that the following personal protective equipment may be required:

1. Protective footwear – CSA approved, meeting CSA Standard CAN/CSA-Z195-M92 (green label).
2. Protective eyewear – CSA approved, meeting CSA Standard CAN/CSA-Z94.3-92.
3. Hard Hats – CSA approved, Type II.

All equipment must be maintained and used according to the manufacturer’s specifications. Any equipment not maintained to the manufacturer’s specifications must be taken out of service and reported to the Supervisor who will then report to the Management immediately. PPE will not be modified or changed contrary to the manufacturer’s instructions or specifications. All employees will be trained in the care, maintenance, and use of personal protective equipment. (See training)

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5.2 - PPE STANDARDS

The following will be observed and practiced by the company and employees when the company undertakes any job or contract.

- All employees, and visitors will wear CSA-approved PPE required for the worksite.
- All PPE used by this company will be within the requirements of OH&S regulations and CSA standards.
- All PPE used by this company will be maintained in accordance with the manufacturer's instructions and requirements and will be inspected before use and as per manufacturers' recommendations.
- All PPE that appears to be damaged, or in need of service or repair will be removed from service immediately.
- All PPE that has been removed from service will not be returned to service until repaired and inspected by a qualified person.
- No piece of PPE will be modified or changed contrary to the manufacturer's instructions or specifications or OH&S Regulations.

All required (mandatory) PPE will be always worn at the worksite. This may include hard hats, safety footwear, eyewear and appropriate clothing.

Specialized PPE which is used only for specific Jobs or for protection from specific hazards will also be worn and may include gloves, welder's goggles, and respiratory protective equipment, for fall arrest.

Do:

- obtain expert advice before purchasing a fall-arresting device.
- properly train with a demonstration of the system you decide to use.
- inspect carefully before each use (inspection to be performed by a trained worker).
- follow the manufacturer's instructions on care and use.
- use a full-body harness with a shock absorber whenever possible.

Don't:

- modify, change, or change harness system.
- use the system for any other than its intended use.
- use the lifeline for a service line.

5.3 - PPE REQUIREMENTS, CARE AND MAINTENANCE

The following Personal Protective Equipment (PPE) will be worn by all workers and contractors on Company worksites.

HEAD PROTECTION

Hard hats will be always worn in designated areas if applicable.

At a minimum, all hard hats must be rated ANSI Z89, Type I, Class E.

- Type I hard hats are intended for the force of impact resulting from a blow to the top of the head.

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- Type II hard hats are intended to reduce the force of impact resulting from a blow which may be received off-centre or to the top of the head. A type II hard hat is typically lined on the inside with thick high-density foam.

Legislative Requirements

If there is a foreseeable danger of injury at a worksite to a worker’s head and there is a significant possibility of lateral impact to the head, injury from falling or flying objects or other harmful contact, the Company must ensure that the worker wears industrial protective headwear that is appropriate to the hazards and meets the requirements.

Proper Care and Maintenance

Do:

- Replace headgear that has been subjected to a blow even though damage cannot be seen.
- Remove from service any headgear if it looks old and worn.
- Replace headgear and components according to manufacturer’s instructions.
- Follow the manufacturer’s instructions on the care and use of the headgear.

Don’t:

- Use solvents or paints on the shells (makes shell “break down”).
- Wear hard hats backwards.
- Use any liner that contains metal or conductive material.
- Carry anything in the hard hat while wearing the hard hat.

FOOT PROTECTION

Safety footwear is designed to protect against foot injuries. Safety footwear is one with a reinforced steel toecap and footplate capable of protecting against heavy blows and punctures.

Legislative Requirements

The Company will ensure that a worker uses footwear that is appropriate to the hazards associated with the work being performed at the work location.

To determine appropriate protection, the following factors must be considered:

- Slipping.
- Uneven terrain.
- Ankle protection.
- Foot support.
- Crushing protection.
- Temperature extremes.
- Corrosive substances.
- Puncture hazards.
- Electrical shock and any other recognizable hazards.

If the hazard assessment identifies that protective footwear needs to have toe protection, (steel toed), a puncture-resistant sole, metatarsal protection (ankle high), electrical protection, chainsaw protection or any combination of the factors above, all workers must wear protective footwear that is approved to:

1. CSA Standard Z195-09, Protective Footwear or Z195-022.

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2. ASTM Standard F2413-05, Specifications for Performance Requirements for Protective Footwear,
3. ANSI Standard Z41-1991, American National Standard for Personal Protection, Protective Footwear*.

* Running shoes are not acceptable for field work or visits.

Proper Care and Maintenance

Do:

- Choose footwear according to job hazard and CSA Standards.
- Lace up the boot and tie laces securely; boots don't protect if they are a tripping hazard or fall off.
- Use a protective boot dressing to help the boot last longer and provide greater water resistance (wet boots conduct current).
- Choose a high boot to provide ankle support (fewer injuries).
- Wear rubber boots equipped with steel toe reinforcement (CSA approved) while handling hazardous materials or working in water or deep mud.

Don't:

- Wear defective footwear (i.e.: exposed steel toecaps).
- Underprotect your feet or modify Safety footwear.

Footwear must be suitable for the task being performed and weather conditions. Safety boots must have non-canvas uppers and completely cover the ankle.

EYE AND FACE PROTECTION

This section is designed to provide management and workers with legislative requirements, Company Policy, and guidance to protect the worker from such hazards as:

- Flying objects and particles.
- Molten metals.
- Splashing liquid.
- Ultraviolet, infrared, and invisible radiation.

Legislative Requirements

The Company will provide industrial eye protection where there is a risk of irritation or injury to the face or eyes of a worker from any of the above hazards and require the worker to use them.

Where there is a risk of irritation or injury to the face or eyes of a worker from flying objects or particles, splashing liquids, molten metal or ultraviolet, visible, or infrared radiation, all workers, (employees and contractors working for the Company must wear industrial eye or face protectors appropriate for hazards involved and the work being done.

CSA-approved Safety glasses are minimum protection at all worksites and are provided by the Company for all Supervisors/employees/contractors.

All employees and contractors shall take all reasonable steps to ensure that a worker does not perform electric arc welding if another worker may be exposed to radiation from the arc unless the other worker is using a suitable industrial eye protector or is protected from the radiation by a suitable screen.

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A worker shall not perform electric arc welding if another worker may be exposed to radiation from the arc unless the other worker is using a suitable industrial eye protector or is protected from the radiation by a suitable screen.

Proper Care and Maintenance

Selection of eye protection is based on hazards related to the scope of work and instructions found on the product MSDS (if applicable). Many companies we work for have a Safety policy that always requires eye protection. Any protective eye PPE must be inspected and thrown out if scratched or broken.

Eye protection must:

- Give adequate protection.
- Not hinder performance (scratched or fogged).
- Be comfortable.
- Meet Safety and CSA Standards.

Prescription eyewear may be worn if it:

- Is Safety eyewear?
- Meets the requirements of CSA Standards.
- Is appropriate to the work and hazard involved.

If corrective lenses are required, CSA-approved prescription Safety lenses and frames shall be used in the work environment.

Contact Lenses

Contact lenses are not protective devices and must be used only in conjunction with appropriate protective eyewear in eye-hazard areas. Contact lenses are not recommended for shop use. Contact lenses may trap or absorb particles or gases causing eye irritation or blindness.

Safety Goggles / Glasses

Safety goggles and glasses are impact-resistant and must meet the minimum requirements of CSA Standard Z94.3.1-09. Both are available in a variety of tints and shades. Tinting and shading must not reduce visibility to increase hazard potential. Where there is potential for splash hazards or dust, safety goggles or Safety glasses with side shields must be worn.

- Goggles or a face shield is required for all grinding, chipping, or any operation that may have foreign objects in the air.
- Goggles are required when working with liquid or powder chemicals, and when braking joints on any pressured equipment. Safety glasses are not sufficient protection.
- Eye protection must be always kept in serviceable condition, meaning both free from cracks and kept clean.

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Eye and Face Protection Care and Maintenance

Do:

- Ensure your eye protection fits properly (close to your face).
- Clean SAFETY glasses daily, more often if needed, and always clean your glasses, goggles, or face shield before storing them.
- Anti-fog solutions can be used on glass or plastic lenses.
- Inspect lenses regularly for pitting and scratches that can impair visibility or integrity.
- Scratched or pitted lenses and loose frames or temples should be replaced or repaired as soon as possible with components from the original manufacturer.

Don't:

- Modify eye/face protection.
- Use eye/face protection that does not have a CSA Certification. (The CSA stamp for Safety glasses is usually in the frame inside the temple near the hinges of the glasses).

LIMB AND BODY PROTECTION

The Company will provide appropriate skin, hand, foot, or body protection if a worker is exposed to a substance or condition which is likely to puncture, or otherwise adversely affect the skin, or be absorbed through it. Limb and body protection equipment shall comply with Provincial OH&S Legislation and Code.

Lower Body Protection

If there is a danger of injury, contamination or infection to a worker's hands, arms, legs, or torso, the worker must wear properly fitting protective equipment appropriate to the work being done and the hazards involved.

Leg protective devices must be worn by a worker operating a chainsaw. Leg protection equipment must meet the general following requirements:

- Be of materials suitable for the intended application.
- The use of leg protection must not unduly restrict the maneuverability of the worker.

Hand and Arm Protection

The Company provides, and requires workers to use, suitable and properly fitted hand or arm protection to protect the worker from injury to the hand or arm, including:

- Injury arising from contact with chemical or biological substances.
- Injury arising from exposure to work processes that result in extreme temperatures.
- Injury arising from prolonged exposure to water.
- Puncture, abrasion, or irritation of the skin.

Where a worker may contact an exposed energized high voltage electrical conductor, and the Company or its contractor shall provide, and require the worker to use, approved rubber insulating gloves and mitts and approved rubber insulating sleeves.

In addition to hazard assessments, personnel (workers) must consult Material Safety Data Sheets prior to handling or working with harmful substances. Appropriate protective apparel must be worn when working with the substances.

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SKIN PROTECTION

The Company will provide, and require the worker to use, approved protective clothing or covers or any other safeguards that provide equivalent protection for the worker to protect them from harmful substances or processes that may injure the skin if contacted may adversely affect a worker's health. These processes are but not limited to:

- Where there is a risk of injury to the skin of a worker from sparks, molten metal, or radiation,
- Where there is a risk of injury to the skin of a worker from fire or explosion, an employer or contractor,
- shall provide the worker with, and require the worker to use, outer fire-resistant clothing that:
 - Meets an approved industry standard,
 - Is appropriate to the risk.

Gloves

Review the Material Safety Data Sheet (MSDS) for the chemical of interest and choose the recommended PPE and gloves required for handling that material.

- Butyl Offers the highest resistance to permeation by most gases and water vapour. Especially suitable for use with esters and ketones.
- Neoprene Provides moderate abrasion resistance but good tensile strength and heat resistance compatible with many acids, caustics, and oils.
- Nitrile Excellent general duty glove. Provides protection from a wide variety of solvents, oils, petroleum products and some corrosives. Excellent resistance to cuts, snags, punctures, and abrasions.
- PVC Provides excellent abrasion resistance and protection from most fats, acids, and petroleum hydrocarbons.
- PVA Highly impermeable to gases. Excellent protection from aromatic and chlorinated solvents. Cannot be used in water or water-based solutions.
- Viton Exceptional resistance to chlorinated and aromatic solvents. Good resistance to cuts and abrasions.
- Silver Shield Resists a wide variety of toxic and hazardous chemicals. Provides the highest level of overall chemical resistance.
- Natural Rubber Provides flexibility and resistance to a wide variety of acids, caustics, salts, detergents, and alcohols.

HEARING PROTECTION

Where feasible, workplace noise levels shall be minimized by **engineering controls** at the source and/or **administrative controls**. When engineering controls cannot reduce noise exposure sufficiently, or where they are not reasonably practicable, the Company will provide workers with **protective equipment**. Hearing protection will be provided in the form of earmuffs or earplugs. Workers must not be exposed to noise that exceeds 85 Dba without the use of hearing protection.

CLOTHING POLICY

Fire Retardant coveralls or flame resistant (when required) and steel toe work boots (CSA approved) are minimum requirements at all sites that there may be a risk of fire and explosion hazards.

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Personal Clothing and Accessories

The personal clothing of a worker must be of a type and in a condition, which will not expose the worker to any unnecessary or avoidable hazards.

If there is a danger of contact with moving parts of machinery or with electrically energized equipment, or if the work process presents similar hazards:

- The clothing of the worker must fit closely to the body,
- Dangling neckwear, bracelets, wristwatches, rings, or similar articles must not be worn, except for medical alert bracelets which may be worn with transparent bands that hold the bracelets snugly to the skin, and,
- Head and facial hair must be confined or worn at a length which will prevent it from being snagged or caught in the work process.

All clothing (**Hot/Cold Weather**) from undergarments to outerwear worn on the worksite shall be:

- Manufactured of material other than polyester, nylon, or poly-cotton.
- Maintained in a clean condition. Clothing contaminated by flammable substances, or skin-irritating substances shall be changed as soon as practical.
- Made of a material that will not melt when exposed to heat, undergarments included.
- Non-static clothing. Suitable materials include cotton or wool.

FIRE RETARDANT CLOTHING

Fire Retardant or fire-resistant coveralls (when required) and steel toe work boots (CSA approved) are minimum requirements at all facilities where fire or explosion hazards may occur.

Fire Retardant clothing should have the following characteristics:

- High level of flame resistance (it should not ignite easily, nor continue to burn).
- Fabric integrity (it should not melt into the skin).
- Anti-static properties (the fabric should not act as an ignition source).
- Keep clean and free of oil, grease, etc. If splashed with flammable liquids remove and replace with clean gear.
- Maintenance of flame resistance when washed or cleaned.

Flame resistant – the characteristic of a fabric to resist ignition to self-extinguish if ignited.

Flame retardant – A chemical substance used to impart flame resistance.

All fire-resistant or retardant clothing must meet standards approved by the Canadian General Standards Board (CGSB) and must be appropriate for the specific tasks.

RESPIRATORY PROTECTIVE EQUIPMENT

Purpose

Federal, Provincial, and local government agencies require that the Company establish a respiratory protection program.

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Legislative Requirements

If respiratory protective equipment is used at a work location, the Company shall prepare a Code of Practice governing the selection, maintenance, and use of respiratory protective equipment.

The Company is required to take reasonable measures to use engineering, work practice, or administrative controls before using respiratory protective equipment. Dust, chemicals, or reduced oxygen in the air create health hazards for workers. The Company must eliminate these hazards if possible. If this is not possible or practicable, the Company must minimize the hazards through engineering controls.

Engineering controls include:

1. Providing local exhaust ventilation.
2. Adding clean air to oxygen-deficient spaces.
3. Enclosing the process that is producing the airborne contaminant.

If engineering controls are not practicable, the Company can use administrative controls to reduce exposure to airborne hazards.

Administrative controls include:

1. Implementing safe work procedures.
2. Scheduling job rotation.

Respiratory Equipment Requirements

Only where airborne hazards cannot be eliminated or sufficiently reduced with engineering or administrative controls may protective equipment be used. There are few situations where respiratory protective equipment alone the best way is to protect workers.

If respiratory protective equipment is used, the Company is required to provide the appropriate equipment, maintain, and store it properly, and ensure that it is properly fitted to the individual worker. The Company will provide and ensure the availability of the appropriate respiratory protective equipment to the worker at the work location. All workers employed by the Company will use the appropriate respiratory equipment provided as per WH&S Regulations.

Where the efficiency of respiratory protective equipment depends on a facial seal, the wearer must be clean-shaven where the respirator contacts the face.

Respiratory Dangers

1. The Company will determine the degree of danger to a worker at a work location and whether the worker needs to wear respiratory protective equipment if:

- A worker is or may be exposed to an airborne contaminant or a mixture of airborne contaminants in a concentration exceeding their occupational exposure limits,
- The atmosphere has or may have an oxygen concentration of less than 19.5 percent by volume, or a worker is or may be exposed to an airborne bio-hazardous material.

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2. In deciding the Company will consider:

- The nature and exposure circumstances of any contaminants or bio-hazardous material.
- The concentration or likely concentration of any airborne contaminants.
- The duration or likely duration of the worker’s exposure.
- The toxicity of the contaminants.
- The concentration of oxygen in the work area.
- The warning properties of the contaminant(s).

Compressed breathing air used with respiratory protective equipment must meet the minimum standards of quality described in the Workplace Health and Safety Code. Equipment used to supply breathing air to workers must be designed and intended for that use. The Company will ensure that workers using respiratory protective equipment are adequately trained.

The Company will ensure no worker is exposed to a substance as to Provincial WH&S (Workplace Health & Safety) at a concentration exceeding its current ceiling limit at any time.

Respiratory Equipment Care, Maintenance and Use

When the atmospheric concentration of dust, vapours, mist, or gas requires the use of respiratory protection, proper training for workers must describe the selection, maintenance, and use of the respiratory protective equipment.

The Company will ensure appropriate respiratory protective equipment is provided for all personnel when hazards require its use. Sub-contractors will be responsible for their own personal protective equipment including respiratory protection when working for the Company. Prior to the use of any respiratory equipment, it must be inspected by a supervisor to ensure it is not damaged and is fit for service. Workers are responsible for wearing the respiratory protective equipment that is provided.

The person selecting respiratory protective equipment must thoroughly understand the equipment and the types of equipment available. This person must be familiar with the equipment’s capabilities, including the degree of protection it can provide, and its limitations.

Other types of respiratory protective equipment that can be proven to provide equal or greater protection may also be used. SCBA and SABA in atmospheres, which are Immediately Dangerous to Life or Health (IDLH), only SCBA (Self Contained Breathing Apparatus) or SABA (Supplied Air Breathing Apparatus) shall be worn. An IDLH atmosphere is an atmosphere, which has:

- 1) A concentration of, or a combination of concentrations of hazardous substances which exceed or may exceed the Occupational Exposure Limit (OEL).
- 2) An oxygen-deficient atmosphere containing less than 19% oxygen, or an atmosphere which does not, and cannot have an IDLH atmosphere; but the concentration of contaminants exceeds or may exceed the amount specified by the manufacturer of air purifying respiratory protective equipment.
- 3) The chemical characteristics of the airborne contaminant(s) and how they affect human health (e.g., toxicity). If more than one chemical is airborne, the characteristics of the mixture of chemicals must be considered.

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- 4) The concentration of oxygen in the air to be inhaled and the potential for the concentration of oxygen to be reduced because of an increase in the concentration of, or reaction with, an airborne contaminant or other hazardous material.
- 5) The duration a person is exposed to the airborne contaminant.
- 6) Limitations associated with restricted egress (e.g., confined space) from the area where the airborne contaminant is located.
- 7) Other hazards that are also located within the area where the airborne contaminant is found.
- 8) Site conditions that may limit the reasonable and practical application of a specific type of respirator (e.g., restricted access, the need for face protection in addition to respiratory protection).
- 9) Limitations of applicable engineering and administrative controls and Emergency response precautions that must be implemented in the event of a failure of these controls.
- 10) Limitations (e.g., protection factor, chemical compatibility) associated with each type of respirator.
- 11) An assessment must be completed to identify, quantify, and evaluate hazards associated with an activity, task, or work. If the hazard assessment identifies an airborne contaminate, respiratory protection that requires the use of a respirator must be evaluated by considering the items listed above. Copies of all hazard assessments must be forwarded to the Company HSE Department.

Air Purifying Respirators

Workers may wear air-purifying respirators if:

- The oxygen content is, and will continue to be above 19 %,
- The air purifying respirator is equipped with filters specifically designed to filter out all harmful substances present,
- The atmospheric concentration of all harmful substances is and will continue to be less than the concentration for which the filters are rated, and the time for which the filters are rated is not exceeded.
- **SCBA** or **SABA** may also be worn under these conditions.

5.4 - PPE TRAINING REQUIREMENTS

All employees will be trained in the care, maintenance, and use of all PPE. Supervisors will be responsible for the training takes place and is refreshed ongoing.

5.5 - PPE ENFORCEMENT

Supervisors and/or management will ensure that PPE equipment is being used at the worksites and is in good condition. Employees who are observed not wearing the appropriate PPE for the job they are performing will be disciplined. See Company Discipline policy.

5.6 - PPE PREVENTATIVE MAINTENANCE PROGRAM

The Company will ensure that all PPE equipment is inspected and maintained to prevent the use of defective equipment. Supervisors will be responsible for ensuring all PPE equipment that is not in good condition is removed from service until repaired or replaced immediately.

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SECTION 6 – INSPECTIONS

6.0 - INSPECTIONS INDEX

- 6.1 - WORKPLACE INSPECTIONS
- 6.2 - FREQUENCY OF INSPECTIONS
- 6.3 - FOLLOW UP PROCEDURES
- 6.4 - SITE-SPECIFIC INSPECTIONS
- 6.5 - FORMAL INSPECTION TRAINING
- 6.6 - UNSAFE ACTS AND CONDITIONS REPORTING

6.1 - WORKPLACE INSPECTIONS

Purpose

Through regular inspections, you can effectively monitor worksite conditions and work procedures. Inspections enable you to ensure company Safety standards and regulatory requirements are being followed. They also enable you to identify hazards before they become problems by revealing where improvements to equipment, work procedures, worker training and worksite conditions are needed.

Policy

DEG ENGINEERING believes that preventative measures are required to control and minimize losses of human and material resources. **Regular inspections will be conducted on equipment, buildings, structures, grounds, tools, vehicles, mobile equipment, work methods, practices, and worksite activity.** Such inspections shall be made at intervals that will prevent the development of unsafe working conditions and unsafe actions. Unsafe or harmful conditions found during such inspections shall be remedied without delay. Inspection checklists will be reviewed annually to accommodate updates in facilities, equipment processes and regulatory changes. Annual review of the checklists will be coordinated by the supervisor. All deficiencies found in the inspection reports will be repaired immediately. Regular maintenance will take place on all items in the inspection report.

Worksite Inspections

Worksite inspections will be conducted by the supervisor with the participation of the work crew using a FLHA checklist.

All company employees and contractors are required to continually be on the lookout for conditions or procedures that create circumstances which may lead to injury, harm to the environment or risk to the public. Deficiencies should be corrected immediately, if possible, or reported to local management for action, if necessary. Deficiencies and corrective actions must be documented.

6.2 - FREQUENCY OF INSPECTIONS

Formal and informal worksite inspections are critical to recognizing potential hazards and taking steps to control them. This ensures the work site is kept free and clear of hazards that could cause slips, trips or falls. Inspections require the full participation of all workers/contractors, supervisors, and management, who must take responsibility for identifying and attempting to control the hazards within their work area.

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Formal Inspections are to be completed no less than once monthly and must be completed in a systematic manner to achieve effectiveness.

Our organization is committed to identifying health and safety hazards, monitoring the effectiveness of prevention activities, and initiating corrective action to maintain a safe and healthy working environment.

The purpose of Inspections is to include the:

- provide a formalized process for the continuous monitoring of the workplace.
- regularly identify any unsafe acts, unsafe conditions, and unsafe behaviours.
- determine risks and develop solutions to eliminate or control hazards.
- ensure that implemented controls for hazards are working.
- ensure that facility equipment (i.e., lights, fire alarms, emergency lighting) and emergency systems.
- to identify new hazards which had not previously been addressed.

Inspections shall be conducted of:

- facilities.
- safety systems (such as fire extinguishers smoke detectors, lighting backup, security systems).
- mechanical systems (such as furnaces, boilers, pressure valves, water supply, elevators).
- mechanical rooms, storage rooms, sheds, and yard areas.
- equipment (large).
- mobile equipment (forklifts, scissor lifts, etc.).
- safety mechanisms.
- tools.
- company-owned vehicles/trucks/vans.

Note: All equipment shall be inspected and maintained as per manufacturer’s warranty and maintenance schedules. All equipment must meet legislated requirements to ensure it is safe to operate and is free from obvious defects.

Roles and Responsibilities for Inspections

Inspections will include all levels of the company and include:

- Managers, Supervisors and HSC members shall participate in inspections as per the developed Inspection Schedule.
- Workers are required to conduct formal daily pre-use inspections prior to the operation of powered mobile equipment and trucks. Should a defect be noted during an inspection affecting the safe operation of the equipment, the powered mobile equipment or vehicle will be tagged, keys removed, and management immediately notified. All tools will be informally inspected prior to use, and should a defect be identified, it will be taken out of service.
- Senior Managers/Managers will use this opportunity to include observations of employee OHS behaviours and conditions observed during their inspections. Senior Manager frequency of inspections can be found on the frequency of inspection schedule.
- Contractors/Subcontractors, if any, are responsible for conducting inspections as per the frequency of inspection schedule details.

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Frequency of Inspection Schedule

Inspections/Records	Frequency	Senior Manager	Manager	Worker
Facility/Office	Monthly	Monthly	Quarterly	Participate Monthly
FLHA	Daily Work Sites	Daily on Work Sites	Daily on Work Sites	Daily on Work Sites

***Note: All vehicles are rented as needed.

6.3 - FOLLOW-UP PROCEDURES

An effective follow-up system is required for planned inspections to ensure that corrective action is taken to eliminate hazards and to prevent recurrence of problems. A written procedure will be followed by personnel to ensure inspection items are corrected in order of priority.

Written reports of inspections and a copy of the follow-up action taken will be completed and retained on file for audit and program evaluation purposes for at least three years.

1. For items requiring action, the name of who is responsible for resolving the issue is to be assigned and a target date for when this action is to be completed.
2. When completed, the inspection report is to be reviewed by all parties affected by the report and signed off by those parties as acceptance of its contents and reviewed and signed off by management.
3. For inspections conducted by supervisors, the progress of corrective actions must be monitored when corrective action has been taken based on hazard class priorities. This action should be noted and dated as to when it was completed. Upon completion of all corrective actions, the inspection should be signed off and retained on file for the duration of that project.
4. Records of the follow-up action system will be retained for at least three (3) years.

6.4 - SITE-SPECIFIC INSPECTIONS

Safety inspections of company activities and company-owned workplaces will be performed to identify hazards, unsafe acts and conditions and unsafe behaviour that could potentially cause or create injuries or property damage. There are two general types of inspections used by the Company:

1. Field Level Hazard Inspections.
2. Site Safety Inspections for use of company buildings, worksites and/or vehicles.

Field Level Hazard Assessments and Site Inspections

Field Level Hazard Inspections (FLHA) must be completed by the Supervisor and include Company employees and on-site contractors hired by the company or in the event the Supervisor is also Prime Contractor of the site, all workers on site. All FLHA's must be signed off by all persons involved in the field inspection and FLHA's must be reviewed and signed off by management.

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Site hazard assessment methods will help reduce injuries and illnesses on worksites. Site Hazard Assessments will be conducted at each new work site before work begins when new activity takes place at the field sites and when taking place temporarily at company-owned sites – such as the head office, warehouse, and shop.

Ongoing Facility Inspections

Ongoing inspections should be conducted by supervisory personnel and workers. All employees should constantly watch for unsafe acts and unsafe conditions. In many cases, a supervisor can correct a problem by discussing an unsafe act with a worker or by issuing instructions to have an unsafe condition corrected. The Supervisor should encourage the workers to bring forward their observations of unsafe conditions on an ongoing basis. In fact, this is a worker's right and responsibility under the Occupational Health and Safety Act. Management should always initiate prompt corrective action in response to valid concerns of workers.

6.5 - FORMAL INSPECTION TRAINING

It is mandated that all Supervisors have formal outside training on conducting formal safety inspections. All Supervisors, Management and employees who have a key role in conducting health and safety inspections must have training in formal inspections.

6.6 - UNSAFE ACTS AND CONDITIONS REPORTING

The following procedure defines the process for reporting unsafe acts and conditions and ensuring the health and safety of our workers by removing substandard hazardous conditions.

Reporting Guidelines

Employees are responsible and required (Alberta OH&S) to immediately report any unsafe acts or conditions which have the potential for harm, to their immediate supervisor or prime contractor on site. All reporting must be in writing using the 'Unsafe Act/Unsafe Condition Report' form. All reports will be reviewed by management and safety committee members. Corrective action must be put in place as soon as practical with a due date, completion date and person responsible noted.

Records of these reports must be filed with other safety records and kept on file for at least 3 years.

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SECTION 7 - PREVENTATIVE MAINTENANCE

7.0 - PREVENTATIVE MAINTENANCE INDEX

- 7.1 - PREVENTATIVE MAINTENANCE POLICY
- 7.2 - PREVENTATIVE MAINTENANCE PROGRAM
- 7.3 - EQUIPMENT AND MACHINERY
- 7.4 - LOCKOUT/TAGOUT PROCEDURES

7.1 - PREVENTATIVE MAINTENANCE POLICY

Purpose

It is the policy of the Company that all tools and equipment, facilities, vehicles, mobile equipment, and machinery will be properly maintained to reduce the risk of injury and or property damage. A maintenance schedule will be developed for all above. We ask that all Workers, Supervisors, and Managers ensure that our established maintenance programs are completed to the required schedules.

DEG ENGINEERING will ensure all equipment, vehicles, mobile equipment, tools, temporary work offices/trailers used at a worksite are maintained in a condition that will not compromise the health or safety of workers using or transporting it, will safely perform the function for which is intended or was designed, is of adequate strength for its purpose and is free from obvious defects.

All the Company machinery and equipment inventory shall be maintained and kept current. When new equipment/machinery is acquired; it shall be added to the inventory. A preventive maintenance schedule shall be developed and checked monthly, and inspections shall be according to the manufacturer's recommendations and legislative requirements at a minimum. Preventive Maintenance records/inspection reports shall be documented for the life of the equipment/machinery and maintained in the Company files.

All equipment, machinery, mobile equipment, facilities, racking, structures, and vehicles found to be defective shall immediately be reported to a supervisor and/or management. All employees/contractors are responsible for checking their tools, equipment/machinery. Any tools/equipment/machinery found to be defective, (through regular inspections) will be removed from service until it is repaired or replaced before being used again.

Good housekeeping is fundamental to a safe and efficient worksite and must be maintained in all yards, enclosures, and buildings. Waste receptacles shall be provided throughout the work area.

7.2 - PREVENTATIVE MAINTENANCE PROGRAM

Purpose

The purpose of this document is to outline the roles and responsibilities of the Company to achieve effective maintenance of the Company assets. The Company owns and operates machinery and equipment to carry out its services. This policy provides a management framework to ensure all tools, equipment and PPE are properly maintained.

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The objective of this policy is to:

1. Clarify maintenance responsibilities for equipment and machinery assets.
2. Specify the minimum requirements for the management of maintenance of specified assets.
3. Ensure that associated risks are effectively managed.
4. Reduce the risk of personal injury.
5. Ensure that equipment and machinery assets perform effectively and efficiently throughout their service life.

7.3 - EQUIPMENT AND MACHINERY

Purpose

Equipment and machinery are the direct responsibility of the Company and will ensure compliance with provincial legislation and ensure protection of a worker's Safety. It is therefore our policy to identify equipment and machinery requirements so that our employees/contractors ensure their safe use, maintenance, and documentation.

The Company will ensure that all equipment used at a worksite:

- Is maintained in a condition that will not compromise the health or safety of workers using or transporting it.
- Will safely perform the function for which it is intended or was designed.
- Is of adequate strength for its purpose.
- Is free from obvious defects.
- All damaged and faulty equipment reporting procedures will be in place.

Defective Equipment

If at any time equipment, tools, vehicles, or facility is found to be defective at a worksite, whether through a pre-use inspection, a formal inspection of the facility, tools, vehicles, and equipment or while using equipment, tools, or vehicles - it is mandatory that workers shut off the equipment immediately and tag out of service.

7.4 - LOCKOUT/TAGOUT PROCEDURES

Lockout/Tagout

Lockout/Tagout means that any energy source, be it electrical, hydraulic, mechanical or any other source that may cause unexpected movement, must be disengaged, or blocked, and electrical sources must be de-energized and locked in the off position.

Failure to lockout/tagout machinery before working on and performing maintenance on it is a major cause of injury and death and **therefore workers are prohibited from performing maintenance on equipment that is not locked out**. Workers can be electrocuted or lose fingers, hands, and arms or suffer severe crushing injuries because machinery is inadvertently turned on while being serviced or maintained. These injuries can be prevented by establishing an effective lockout/tagout procedure.

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Machine or Equipment Shutdown and Isolation

1. If the equipment is operating, shut it down by the normal stopping procedure (depress the stop button, open the toggle switch, etc.). Only workers knowledgeable in the operation of the specific equipment should perform shutdown or re-start procedures.
2. Operate the energy-isolating device(s) so that all energy sources (electrical, mechanical, hydraulic, etc.) are disconnected or isolated from the equipment.
3. Electrical disconnect switches should never be pulled while under load, because of the possibility of arcing or even explosion.
4. Stored energy, such as that in capacitors, springs, elevated machine parts, rotating flywheels, hydraulic systems, and air, gas, steam, or water pressure, etc., must also be released, disconnected, or restrained by methods such as grounding, repositioning, blocking or bleeding-down.
5. Pulling fuses is not a substitute for locking out. A pulled fuse is no guarantee the circuit is dead. Even if a circuit is dead, another person could inadvertently replace the fuse.
6. Equipment that operates intermittently, such as a pump, blower, fan, or compressor may seem harmless when it is not running. Do not assume that because equipment is not operating at a particular point in time it will remain off for the duration of any work to be performed on it.

Application of Lockout/Tagout

1. Lock out and tag the energy-isolating device with an assigned, individual lock. A worker will not be protected unless he/she uses his/her own padlock.
2. If more than one worker is working on the same piece of equipment at the same time, each one should lock out the equipment, by placing a personal lock and tag on the group lockout device when he/she begins work and should remove those devices when he/she stops working on the machine or equipment.
3. Locks and tags should clearly show the name of the person who applied the device, the date, and the reason for the lockout. This identifies who is servicing the machinery or equipment. In a multiple lockout/tagout situation, it will also identify any worker(s) who may not have finished working.
4. Locks and tags must be durable enough to withstand the environment in which they are to be used. Information on the locks and tags should remain legible.
5. Locks must be substantial enough to prevent removal without the use of excessive force. Tags must be substantial enough to prevent accidental or inadvertent removal.
6. Both locks and tags are to be standardized by colour, shape, or size. Tags should be easily recognized and provide appropriate information about the lockout.
7. For some equipment it may be necessary to construct attachments to which locks can be applied. An example is a common hasp to cover an operating button. Tags must be attached to the energy isolating device(s) and to the normal operating control in such a manner as to prevent operation during the lockout.

Removal of Locks & Tags

Upon completion of work, ensure equipment is intact and all tools and other items have been removed. Check the equipment area to ensure no one is likely to be at risk upon re-energization of equipment/machine. Locks and tags are to be removed only by the person who placed them on the machine/equipment.

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In the event a worker is absent when the locks are to be removed, the absent worker’s supervisor has the authority to remove the lock provided each of the following conditions is met:

- The system is deemed by the supervisor safe to unlock, removal is documented on the attached form,
- Upon returning to work, the absent worker is immediately notified verbally by the supervisor and in writing by way of the form of the lock removal.

Verification of Isolation

1. After ensuring that no workers can be injured, operate the push button or other normal controls to verify that all energy sources have been disconnected and the equipment will not operate.
2. If there is a possibility of re-accumulation of stored energy, such as an increase in pressure to a hazardous level, isolation of the equipment must be periodically verified until the maintenance or repair is completed, or until the possibility of such accumulation no longer exists.
3. Return operating controls to a neutral position after the test. A check of system activation (e.g., use of a voltmeter for electrical circuits) should be performed to ensure isolation.
4. The equipment is now locked out.

Lockout/Tagout Interruption

If a machine is locked/tagged and there is a need for testing or positioning of the equipment/process, the following steps should be followed:

- Clear the equipment/process of tools and materials.
- Ensure workers are at a safe distance from any potential hazard.
- Remove locks/tags according to established procedure.
- Proceed with test.
- De-energize all systems and re-lock/re-tag the controls before resuming work.

Facilities Maintenance

The office space, building, shop, and warehouse are all considered to be ‘facilities. The company will ensure a facilities schedule is completed and should include:

- Fire extinguisher – annual inspection – swap out.
- Garage doors and racking.
- Fire suppression system.
- Ventilation System.

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SECTION 8 - TRAINING & NEW HIRE ORIENTATION

8.0 - TRAINING & NEW HIRE ORIENTATION INDEX

- 8.1 - TRAINING POLICY
- 8.2 - NEW HIRE ORIENTATION
- 8.3 - JOB SPECIFIC TRAINING
- 8.4 - SUPERVISOR TRAINING

8.1 - TRAINING POLICY

DEG ENGINEERING will ensure that our employees are skilled and trained in all areas necessary for them to be able to perform their jobs in a competent, safe, and healthy manner. The Company will ensure that the appropriate skills and expertise have been verified during the hiring process. All education, courses, and tickets will be checked and validated as part of the hiring process.

New and Re-Assigned Workers

Employees will receive job-specific training when they are assigned new tasks or when an operation change affects their work. Reassignment can include a new job task, or when a worker moves to a new location. Operational changes may require a new competency assessment to be completed.

The Company will provide and ensure that all employees participate in the following training:

1. New hire training and skills to properly perform the job they are being hired for.
2. Safety orientation.
3. Job-specific training as required.
4. Ongoing training.
5. Training for new tasks/equipment/environment.
6. Work refusal.
7. Workplace violence and harassment.

8.2 - NEW HIRE ORIENTATION

New employees of the Company shall be oriented into the company immediately after being hired on or on the first day of work. No employee shall begin to work on any company work site, without having had the scope and objective of the project explained to him/her by a qualified individual. A tour of the pertinent work site is mandatory.

Standard

1. The Company will develop an orientation program specific to the Company rules and policies and comply with provincial OH&S legislation.
2. The orientation training is to be provided before or on the first day of work.
3. The type of training provided to a worker is to be consistent with the individual's assigned duties, risk exposure, equipment to be used, workers' previous experience and the degree of supervision provided.

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4. New hire training will be given to those who have previously left the company and returned and to employees who move from their current position to a new role at the company.
5. Employees who move to a new role at the company will be trained on all the new tasks they will be asked to perform, which will include health and safety training.

New Hire Orientation will include:

- Company health and safety rules and rules of enforcement (disciplinary policy).
- All new employees will receive a basic job site-specific safety orientation.
- Workers' Right to Refuse unsafe or dangerous work and the work refusal process (Alberta OH&S).
- Employees' Right to Know hazards in their jobs (Alberta OH&S).
- Employees' Right to Participate in safety committee meetings etc. (Alberta OH&S).
- Emergency response procedures for all work sites.
- Critical hazards for their jobs.
- Hazard Reporting, unsafe conditions, acts, psychological or physical harm, harassment, stress, violence.
- Report of work refusals.
- Incident reporting, including injury, accidents, occupational illness, near misses, vehicle accidents, environmental spills, and incidents that result in damage to equipment/facilities.
- Workplace harassment and violence policy and plan.
- Company mandatory PPE requirements including Instructions on the use and care of personal protective equipment.
- Company and prime contractor safety policies and rules.
- Specific health and safety job hazards, safety precautions, and control measures.
- Alberta OH&S Regulation and Code.

8.3 - JOB-SPECIFIC TRAINING

Additional job-specific training will be provided to meet Company standards for the job tasks being performed at our work sites. Health and safety training is a vital component of accident prevention, legislation, and our safety program - we will do all that is reasonably practicable to ensure all employees are competent for the task assigned. All training will be recorded and kept on file for future reference and organization of refresher training.

Additional specialized safety training will be done as required. This may include training such as:

- Workplace Hazardous Materials Information System (WHMIS).
- First Aid & CPR (to Alberta OHS Schedule).
- Workplace Harassment and Violence.
- Accident Investigation.
- Workplace Inspections.
- Hazard Assessment and Methods of Control.

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Job-specific training ensures that each employee can do the job and knows how to do it right. This type of training should be conducted:

- At the time of hire.
- When an employee is assigned new or different work.
- When an employee is moved to a new site or location.
- When new tools and/or equipment are introduced.

Job-specific training should be conducted by the employee's immediate Supervisor. Supervisors and Management must ensure new employees, employees who have been given new roles and/or job tasks are not only given training but observed to be competent in their roles.

The Supervisor should:

- Review with the employee the company's Safe Job Procedures and any Formal Hazard Assessments that apply to the specific job.
- Bring all known safety hazards that may affect the employee to his/her attention.
- Determine just what the employee can do and how he/she does it. This includes both discussion with the employee and observation of how he/she does the work.
- Provide the employee with all information that is necessary for the employee to do the job safely and correctly.
- Update the training matrix with new training records and keep copies of tickets on file.
- Observe workers working in their new roles to ensure they are competent.

Standard

- All Supervisors are responsible for ensuring that all employees are adequately trained in accordance with the requirements of the job position.
- Supervisors and management are to ensure adequate training records are maintained and current.
- It is the worker's responsibility to ensure their direct Supervisor is notified if they are asked to perform a task for which they have inadequate knowledge or skill.
- Workers are responsible for ensuring that their own training needs are identified to their manager.

8.4 - SUPERVISOR AND MANAGEMENT TRAINING

Our safety program realizes the need for safety training for our Supervisors and Managers. Supervisors and Managers **will have at least one type of training** based on their role at the company.

Supervisors receive training in overseeing and managing work, including pertinent procedures and components of safety programs and provincial OH&S regulations.

Management will receive training in basic safety management systems and/or OHS Legislation to ensure they have the knowledge and understanding they need to ensure all employees and Supervisors are compliant with legislation and meeting the safety standards.

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Such training may include the specialized training mentioned above. It may also include training in other areas such as:

- Supervisory training.
- Manager training courses or diplomas/degrees.
- Hazard identification and assessment.
- Provincial OH&S legislation.
- Safety management systems (ex. through COR Partnership).

8.5 – WORKER COMPETENCY

It is a requirement for the company to ensure all workers are competent in the work they perform. Supervisors and or Managers who direct work to others must ensure they perform a worker competency check, especially for new workers, younger workers and workers who have recently moved into a new position or role. Supervisors and Managers will conduct a competency check on their employees, in writing at least annually or within 2 months of employees taking on a new position or role.

Any employee/worker who is not deemed to be competent in the work they are performing should have additional training or be kept at arms-length of more experienced workers (mentorship program) doing the same job tasks until deemed competent.

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SECTION 9 – ACCIDENT / INCIDENT REPORTING & INVESTIGATIONS

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- 9.1 - ACCIDENT/INCIDENT REPORTING POLICY
- 9.2 - INCIDENT CLASSIFICATION
- 9.3 - REPORTING PROCESS
- 9.4 - INVESTIGATION POLICY
- 9.5 - ROOT CAUSE ANALYSIS
- 9.6 - CORRECTIVE ACTION
- 9.7 - INVESTIGATION PROCESS/STEPS – INCIDENT TYPES
- 9.8 - FOLLOW-UP
- 9.9 - FATALITY
- 9.10 - ACCIDENT/INCIDENT STATISTICS

9.1 - ACCIDENT/INCIDENT REPORTING POLICY

Incidents and accidents are reported to prevent recurrence, collect information for tracking accident trends and filing investigation and insurance reports, and comply with WH&S (Workplace Health and Safety) and or WCB (Workers Compensation Board) in each Provincial Jurisdiction. All incidents such as injury accidents, workplace illness (including COVID-19), near misses, accidents and incidents that involve damage to the environment and/or buildings and equipment, motor vehicle accidents, medical events (heart attack, stroke etc.) work refusal and workplace harassment/violence events that happen during work hours shall be reported and include:

- All near-miss incidents which include all incidents that under slightly different circumstances, could have resulted in an injury or loss.
- All First Aid injury incidents.
- All Medical Aid injury incidents (doctor visits, stitches, hospital).
- All Medical Emergency incidents (heart attack, stroke, sickness, fainting).
- All incidents that cause property damage or equipment damage or interrupt operations.
- All motor vehicle accidents.
- All occupational health incidents (chemical burn, inhalation, ergonomic, extreme noise, stress).
- All violence or workplace abuse/harassment events.
- Environmental spill, release, toxic chemical, or gas leak.
- All occupational health or illness incidents.
- All work refusals.

RESPONSIBILITIES FOR REPORTING

Employees – are responsible for reporting all incidents to their direct Supervisor immediately after all incidents indicated in the Company policy including injury incidents, illness or near misses and/or as notification specifies for the emergency incident situation. Employees must be involved in the incident investigation process.

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Supervisors – are responsible for writing the incident report, have it reviewed by management and conduct a full investigation. The investigation must be conducted immediately and must determine the root cause, and underlying causes and make recommendations for corrective actions. Supervisors are responsible for ensuring corrective actions are implemented in their area and follow-up to ensure that the actions are effective in a reasonable time frame. The Supervisor is responsible for communicating the incident reporting and investigation process to employees during the new hire orientation and refreshes during safety meetings/toolbox safety meetings on-site.

Management – must review the incident and investigation reports approve or make further recommendations and sign off on the report.

9.2 - INCIDENT CLASSIFICATION

Classification of the terminology below should be whether the loss occurred or by the potential for loss of a near miss.

First Aid

When an injury results in a one-time treatment and subsequent observation of minor scratches; cuts; burns; splinters; and so forth, which do not require medical aid, regardless of whether this care is provided by a physician or registered medical professional and is able to resume his/her work.

NOTE: First Aid Incidents are considered Non-Recordable

Medical Aid/Treatment

When an employee is injured, then treated by a Physician or registered medical professional (other than first aid), under the standing orders of a physician. After receiving medical attention, the employee can continue with his next scheduled shift.

NOTE: Medical Aid/Treatment Cases are Recordable.

Restricted Work Case (RWC)

A Restricted Work Case occurs when an employee cannot perform at normal capacity but does not result in days lost from work. An RWC occurs when, because of a work-related injury or illness:

1. The employee is temporarily assigned to another job.
2. The employee cannot perform at normal capacity for all or part of his work shift.
3. The employee works his regularly assigned job but cannot perform all duties normally connected with it.

NOTE: Restricted Work Cases are Recordable.

Lost Time

When an employee has been injured and has been advised by a Physician to stay off work due to the nature of his injury. The employee is unable to report to his next shift.

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NOTE: Lost Time Accidents are Recordable.

Serious Incident

- ✓ **Personnel:** any serious injury (restricted work or medical aid).
- ✓ **Property Damage (Loss):** any damage or loss > \$5,000.00.
- ✓ **Environmental:** any reportable occurrence.
- ✓ **Reputation:** government intervention.
- ✓ **Vehicle:** vehicle incidents may involve personal injury, reputation, environmental and property damage depending on the severity, cause, and other external factors.

9.3 - REPORTING PROCESS

Where the Company becomes aware of an accident, occupational disease, or other hazardous occurrence affecting any of his employees in the course of employment, the Company shall, without delay:

1. Appoint a qualified employee with Accident Investigation training to carry out an investigation of the hazardous occurrence.
2. Notify the workplace Committee or the health and Safety Representative of the incident/ occurrence and of the name of the person appointed to investigate it.
3. Have the Committee and/or Management provide input and suggestions for corrective action in the investigation process.
4. Take necessary measures to prevent a recurrence of the hazardous occurrence with follow-up on the corrective actions put in place.

NOTE: All investigation reports must be reviewed and signed off by management.

The Company Incident Report Form

Where the Company employee/contractor becomes aware of an incident/accident, near miss or other occurrence arising during or in connection with the employee’s work that has caused or is likely to cause injury to that employee or to any other person, the employee/contractor shall, without delay, report the accident or other occurrence to his supervisor/the Company, orally and in writing. The Supervisor responds to the event and notifies the appropriate Management and regulatory authorities.

All incidents/accidents must be communicated with employees.

This can be accomplished through the health and safety committee (and minutes to the investigation), meetings or by e-mail. It is important that employees know what type of incident has taken place, recommendations for preventative measures and the date that the preventative measures have been put in place.

Alberta Occupational Health and Safety Reporting

In the case of a serious Near Miss or Injury Accident, the Company will follow Alberta OH&S Legislation and Code (see new Bill 47).

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You must call the OHS Contact Centre ([1-866-415-8690](tel:1-866-415-8690)) as soon as possible if:

- a worker has died at work or from an illness connected to the work site.
- a worker has been or will be admitted to a hospital because of a workplace injury, illness, or incident:
 - note that hospital admission does not include treatment at an emergency room or urgent care centre.
- a person has been injured or becomes ill from:
 - an unplanned or uncontrolled explosion, fire, or flood.
 - the collapse or upset of a crane, derrick, or hoist.
 - the collapse or failure of any component of a building or structure.

You must also [report certain incidents online](#) as soon as possible. These are:

- no injury or illness involved, but the following incident has occurred:
 - unplanned or uncontrolled explosions, fires, or floods.
 - crane, derrick or hoist collapses or upsets.
 - full or partial building or structural collapses or failures.

Note: if you're notifying OHS about this type of incident on a weekend, statutory holiday, Government of Alberta closure day or on a weekday between 4:30 pm and 8:15 am, you must call the OHS Contact Centre rather than reporting online:

- mine or mine site incidents described in section 544 of the OHS Code:
 - but if a death, serious injury, illness, or incident has occurred at a mine or mine site, call the OHS Contact Centre as soon as possible.

WCB Reporting

WCB Injury Claim Regulations states:

- By law, employers are required to report injuries that their workers suffer while on the job:
 - If your worker has been injured, you have 72 hours after becoming aware of an injury or illness to submit the Employer Report of Injury form. The sooner we receive your information, the faster we can determine entitlement to benefits and services for your worker.

You need to submit a report to WCB if the accident results in, or is likely to result in:

- lost time or the need to modify work temporarily or permanently beyond the date of the accident.
- death or permanent disability (amputation, hearing loss, etc.).
- a disabling or potentially disabling condition caused by occupational exposure or activity (such as a mental health concern, poisoning, infection, respiratory disease, dermatitis, etc.).
- the need for medical or mental health treatment beyond first aid (assessment by physician, psychologist, physiotherapist, chiropractor, etc.).
- incurring medical aid expenses (dental treatment, eyeglass repair or replacement, prescription medications, etc.).

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9.4 – INVESTIGATION POLICY

An investigation must take place for all incidents including near-miss incidents and illnesses, injury accidents, vehicle accidents, work refusals, workplace harassment, workplace violence, even if no injury or damage involved, COVID-19 illness, workplace harassment and violence events. Investigations will take place as soon as practicable. Serious accidents and incidents must an investigation investigated within 24 hours of the incident and reviewed by Management and/or a Committee within 48 hours.

If an injury or accident, near miss, illness, work refusal, workplace harassment/violence, property damage, or vehicle incident (injury/damage or not) occurs at a worksite or if any other serious injury or other accident that has the potential of causing injury to a person occurs at a worksite that company employees or sub-contractors for the company a full investigation must be conducted for all reported incidents at the company which will include:

- All near-miss incidents which include all incidents that under slightly different circumstances, could have resulted in an injury or loss.
- All First Aid injury incidents.
- All Medical Aid injury incidents (doctor visits, stitches, hospital).
- All Medical Emergency incidents (heart attack, stroke, sickness, fainting).
- All incidents that cause property damage or equipment damage or interrupt operations.
- All motor vehicle accidents.
- All occupational health incidents (chemical burn, inhalation, ergonomic, extreme noise, stress).
- All violence or workplace abuse/harassment events.
- Environmental spill, release, toxic chemical, or gas leak.
- All occupational health or illness incidents.
- All work refusals.

Accident Investigation – Alberta OH&S Legislation

The prime contractor must complete an investigation into any reportable incident. If there is no prime contractor, the employer must carry out the investigation. There are several steps in an incident investigation.

Collect information

An investigation starts with a fact-finding mission that collects information about what happened. Some ways to collect information include:

- Taking pictures of or sketching the scene.
- Interviewing workers and witnesses.
- Listing equipment and materials being used.
- Reviewing health and safety records, such as inspection reports, training summaries and/or past incident reports. Use the information collected to paint a complete picture of the incident. From there, you can start to look at why the incident happened and how to prevent recurrence.

Identify causes

There are several models you can use to identify incident causes. These range from simple domino models to complex models such as root cause analysis. The simple model below groups incident causes into five categories.

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- Task looks at the work procedures used at the time of the incident.
- Material asks if equipment and materials contributed to the incident.
- Environment considers the physical work environment.
- Personnel asks relevant questions about the people directly involved in the event.
- Management looks at organizational factors, such as management systems, hazard assessment and control processes, or worker orientation and training.

Well-designed corrective actions relate directly to the root causes of an incident and are specific and constructive. Corrective actions put new controls in place or improve existing controls. Controls must always follow the hierarchy described in Section 9 of the OHS Code.

For more information, read Hazard Assessment and Control. If corrective actions have been identified, they must be implemented to be effective. As the prime contractor or employer, make sure you assign specific action items to individuals and follow up to ensure they're carried out. Share any changes with workers.

The investigation must include:

- Carry out an investigation into the circumstances surrounding the incident/event.
- Prepare a report outlining the circumstances of the event.
- Include direct causes and the root cause of the event/incident, near miss, or illness.
- Ensure corrective action is recommended.
- Conduct follow-up to ensure the corrective action has been implemented and working.

The Company will investigate and follow up on all reported incidents, identifying root causes and correcting deficiencies.

Incident Investigation Training

Only employees qualified to conduct incident /accident investigations by means of taking a formal Incident Investigation course/training are allowed to investigate Company incidents/accidents. All incident investigation team members must be trained by the Lead Investigator who has had extensive training and experience in Incident Investigations or have taken formal Incident Investigation training themselves.

The purpose of the incident investigation is to determine the root cause and underlying causes of the incident and put in place corrective actions with the aim of preventing a similar incident from occurring again.

9.5 - ROOT CAUSE ANALYSIS

Definition of Root Cause

Root Cause Analysis is a method that is used to address a problem or non-conformance, to get to the “root cause” of the problem. It is used so we can correct or eliminate the cause and prevent the problem from recurring.

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Root Cause is the fundamental breakdown or failure of a process which, when resolved, prevents a recurrence of the problem. Or, in other words for a particular product problem, **Root Cause** is the factor that, when you fix it, the problem goes away and doesn't come back.

Root Cause Analysis is a systematic approach to get to the true root causes of our process problems. To help achieve this goal.

How to Conduct a Root Cause Analysis

It is important to consider all possible "what," "why," and "how" questions to discover the root cause(s) of an incident.

A root cause analysis may reveal that the root cause was a failure of the Management System in some way and therefore corrective action would include looking at ways the Management System may need to change or improve. The root cause for a spill, for example, may include failure to have an effective inspection, maintenance program and repairs completed that would have prevented or detected oil leaks. In contrast, an analysis that focused only on the immediate cause (failure to clean up the spill) would not have prevented future incidents because there was no system to prevent, identify and correct leaks.

Benefits of Root Cause Analysis

Conducting a thorough investigation that identifies root causes will help to prevent similar events from happening again. In this way, employers will reduce the risk of death and/or injury to workers or the community or environmental damage.

Root Cause Analysis Tools

Below is a list of tools that may be used by employers to conduct a root cause analysis. The tools are not meant to be used exclusively. Ideally, a combination of tools will be used.

- Brainstorming.
- Checklists.
- Logic/event trees.
- Timelines.
- Sequence diagrams.
- Causal factor determination.

For simpler incidents, brainstorming and checklists may be sufficient to identify root causes. For more complicated incidents, logic/event trees should also be considered. Timelines, sequence diagrams, and causal factor identification are often used to support the logic/event tree tool.

It is the policy of this Company to have all incidents identified in the Incident Reporting Policy to be investigated which will include all near misses, injury incidents, environmental impact, and illness. Or any incident that involves damage to company equipment or vehicles. For information on how to conduct investigations involving Work Refusal and Workplace Harassment/Violence (see Section 2).

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Investigations can differ depending on the type of investigation. A minor incident or first aid injury will have different steps than a very serious injury accident. Investigating a work refusal or workplace harassment/violence complaint will have their own investigations. For more information on how to conduct these investigations (see work refusal policy and workplace harassment/violence investigation process in Section 2).

9.6 - CORRECTIVE ACTION

Once the root causes of the incident have been determined, the next task is to make recommendations or corrective action on how to prevent similar occurrences in the future. A widely accepted hierarchy of remedial actions, in order of desirability, is:

1. Eliminate the hazard for instance, by substituting a non-hazardous chemical for a hazardous one.
2. Contain the hazard (prevent contact, as by machine guarding).
3. Revise the work procedure (for example, by incorporating a lockout system).
4. Reduce the exposure (use personal protective equipment).

Corrective action should be specific, stating exactly what is to be done, who will do it, when it will be done by and how completion of the corrective action is to be confirmed or monitored. If the investigation has uncovered Safety deficiencies not directly related to the incident, it is still useful to make note of them and make general recommendations for their solution.

Incident investigation is not intended to be a fault. If it was an individual’s shortcomings that contributed to the incident, these must be pointed out if the report is to be complete and honest. Follow-up action may include training and, in some cases, disciplinary action if it is determined that the individual was intentionally not following rules or policy.

Management and/or Supervisors shall initiate corrective action without delay to prevent the recurrence of similar incidents and shall post the report for reference by workers. Management may decide to implement the recommendations either as presented or in modified form. Reasons for revision or rejection of recommendations should be communicated to all concerned.

Management Review

After reviewing the report, Senior Management may consider other initiatives based on the findings of the investigation; the following questions must be addressed during all investigation reviews.

An accident is an unfortunate reminder that problems exist in the health and safety management system. Senior Management will make every effort to learn as much as possible from each event to ensure recommended corrective action has taken place. All Investigation Reports will be reviewed and signed off by Senior Management and kept on record for at least 3 years.

9.7 – INVESTIGATION PROCESS/STEPS – INCIDENT TYPE

All incidents at the company will be investigated. Not all incident types, however, will be investigated the same. Minor incidents and Near Misses will have a smaller scale investigation conducted compared to a

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serious and/or fatal incident. Work refusals and Workplace Harassment and Violence Incidents will have a different type of investigation process (see Section 2). The following are the processes and steps for investigating minor, near miss, serious and fatal incidents.

Investigation Steps for Non-injury or Minor Injury Accidents - First Aid Incidents

Minor incidents include includes where injury is minor, or first aid was administered by the First Aiders at the worksite. All minor and first aid incidents must be investigated but will require fewer steps than a serious injury accident. The following are the steps to be included in this type of investigation:

1. Determine if the injury is minor and first aid can be administered.
2. Ask the employee if they feel like they may need to see a physician or visit a hospital.
3. Administer first aid when required (if you are qualified or find an available first aider)
4. Notify the employee's Supervisor of the incident.
5. Write an incident report.
6. Forward the incident report to management and/or Committee for review.
7. Write an investigation report that includes causes, underlying causes, root causes analysis and corrective action.
8. Follow up and ensure corrective action is being implemented.
9. Communicate the incident to all employees during a Safety/Toolbox meeting.

Investigation Steps for Serious to Fatal Injury Incidents

In the case of a very serious injury accident – DO NOT DISTURB THE SCENE

1. Take control of the scene.
2. Ensure that any injured persons are cared for.
3. Ensure that no further injury or damage occurs.
4. Get the “big picture” of what happened.
5. Examine the equipment/materials involved.
6. Collect and safeguard any physical evidence.
7. Take photographs of the scene.
8. Interview people involved and obtain written statements where appropriate.
9. Analyze all the available information to determine the causes (root cause).
10. Look for causes where ‘the system failed the worker’, not only for those where the ‘worker failed the system’.
11. Determine what corrective action will prevent recurrence.
12. Contact Alberta OH&S and report the serious incident/accident (see legislation guidelines).
13. Complete a report.

Other Types of Investigation Processes and Steps

- Workplace Harassment and Violence (see Section 2 Policy).
- Work Refusal (see Section 2 Policy).

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9.8 - FOLLOW-UP

DEG ENGINEERING will clearly state who is to be responsible for the follow-up action, what deadlines are to be met, what additional resources have been allocated to the task, and how completion is to be reported or monitored. All new follow-up information must be communicated to employees.

9.9 – FATALITY

It is important that when a very serious accident/incident occurs that involves a fatality employees understand the process and steps to follow in this case.

If you are the first responder to a fatal injury accident, ensure you contact 911 immediately and secure the scene:

- Do not leave the scene unless dangerous to do so.
- Wait for emergency responders/police to arrive and follow their instructions.
- Notify the company senior management team immediately.
- Never talk with the media or answer their questions.

Common types of fatal incidents investigated by OHS include:

- Falls.
- struck by objects.
- caught by objects.
- transportation incidents.
- exposure to harmful substances.

Motor vehicle accidents

If a reportable incident involving a motor vehicle occurs, and a worker under provincial jurisdiction is injured, OHS investigates. Depending on the circumstances, OHS involvement can range from a full investigation to follow-up inspections and compliance checks.

Occupational disease fatalities

Deaths due to occupational disease are reported by a physician and included in provincial industry statistics. These are now required to be reported to Alberta OH&S as of December 1, 2021.

9.10 - ACCIDENT/INCIDENT STATISTICS

To establish a systematic method of reporting incident/accident frequency and severity. This procedure applies to incidents and accidents involving The Company employees/contractors and is implemented annually to provide a meaningful basis for incident/accident performance management.

An incident/accident investigation involves the methodical examination of an undesired event that did or could result in physical harm to people or damage to property. Investigation activities are directed toward defining the facts and circumstances related to the event, determining the causes, and developing remedial actions to control the risk of recurrence.

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Reporting Statistics

The Company will prepare the following reports on a regular basis.

- Lost Time Accident Frequency.
- Total Accident Frequency (includes all lost time and medical aid accidents).
- Injury and Illness Severity.
- Work Refusals, Workplace Harassment and Violence.

Statistic Analysis – Patterns and Trends

It will be important for the Committee/Management to look for patterns and trends for injury statistics gathered. The company will look at the statistics identified for the year and look for patterns and trends. Identifying patterns and trends will show what types of incidents/events have been occurring often.

For example: Hand injuries or near-miss events are reported often throughout the year. The company would want to take a closer look at these types of incidents and see where the incidents are taking place and what type of job task the worker was performing at the time of the incident. Corrective action should be put in place to eliminate or at least mitigate this type of incident from happening in the future. In this case, perhaps adding cut-proof gloves as additional PPE for workers.

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SECTION 10 - EMERGENCY RESPONSE

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- 10.10 - FIRST AID REQUIREMENTS
- 10.11 - EMERGENCY RESPONSE RECORDS

10.1 - EMERGENCY RESPONSE POLICY

The Company's Emergency Response Plan (ERP) has been developed to ensure the health and safety of all employees at the Company's office, employee's home offices and work sites during an emergency. Workers may, however, be contracted out to work at customer's work/field sites and will be required to be aware of (during orientation) and follow the Emergency Response Plan developed by the customer/prime contractor.

All emergency incidents must have a written incident report completed, and a full investigation done by the supervisor and individuals involved.

10.2 - EMERGENCY RESPONSE PLAN

The Company's "Emergency Response Plan" is a written document that outlines the responsibilities, notifications, levels of emergencies and rescue plan in the event of an emergency occurring. An Emergency is any incident that has the potential to cause immediate harm to workers, property, the public and/or the environment.

The Company will follow Alberta OH&S Code Section 116.

Emergency Plan

The Company will follow Alberta OH&S Emergency Response Plan legislation as per Section 116 of the Code as follows:

Contents of plan

116 An emergency response plan must include the following:

- a) the identification of potential emergencies.
- b) procedures for dealing with the identified emergencies.

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- c) the identification of the location of and operational procedures for emergency equipment.
- d) the emergency response training requirements.
- e) the location and use of emergency facilities.
- f) the fire protection requirements.
- g) the alarm and emergency communication requirements.
- h) the first aid services required.
- i) procedures for rescue and evacuation.
- j) the designated rescue and evacuation workers.

Emergency Response Team

The employer will put together an Emergency Response Team that will include internal Workers/Managers/Supervisors. An employer must designate the workers who will provide rescue services and supervise evacuation procedures in an emergency.

- 117(2) An employer must ensure that designated rescue and emergency workers are trained in emergency response appropriate to the work site and the potential emergencies identified in the emergency response plan.
- 117(3) The training under subsection (2) must include exercises appropriate to the work site that simulate the potential emergencies identified in the emergency response plan.
- 117(4) The training exercises referred to in subsection (3) must be repeated at the intervals required to ensure that the designated rescue and evacuation workers are competent to carry out their duties.

The Company’s emergency response plan must be in writing and include several different levels of emergencies (Low to High) and different types of emergency scenarios specific to the type of work and environments in which our employees perform work. The Health and Safety Committee will be responsible for conducting drills (tabletop and on-site) to ensure the effectiveness of the emergency response plans and make changes to improve the plan when needed.

The Emergency Response plan must include:

- Communication plan: radios, cell phones, building alarms.
- Notifications: emergency notifications for each level of emergency (Operations Manager/Owner, Management, Supervisor, Alberta OHS, and other government regulatory agencies specific to the incident type).
- Emergency Response Personnel: for internal and external response.
- Emergency Response Contact Numbers: for internal and external response.
- Evacuation and Rescue Plan: On-site, Off-site, Office.
- Monitoring the effectiveness of the plan.

Objective of Emergency Response Plan

The objective of the emergency response plan is to ensure the safety of workers, contractors, and visitors to our site. In addition, the plan is expected to:

1. Reduce the potential for causing property damage or further losses from production stoppage.
2. Assist response personnel to determine and perform remedial actions quickly and effectively.

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3. Reduce any effect on the environment.

The emergency response plan must be written for each work site, including:

1. Office, shop, and warehouse.
2. Field sites.
3. Mobile sites.

The emergency response plan will include emergency scenarios appropriate to the hazards at each work site. For example, the office may have emergency situations that would include:

1. Medical emergency.
2. Fire.
3. Violent encounters.

The field site may have emergency scenarios that would include:

1. Vehicle Accident – serious.
2. Medical Emergency.
3. Injury Accident/Fatality.
4. Toxic Chemical Release.
5. Violent Encounter.
6. Fire/Explosion.

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10.3 - EMERGENCY RESPONSE PLANS

<p>VEHICLE ACCIDENT/INCIDENT CALL 911</p> <p>It is an offence if you either fail to stop at the scene of an accident or fail to report an accident in which you are involved. If a road traffic accident in which you are involved as a driver results in injury to someone other than yourself, injury to an animal, or damage to property, there are important things you must do to avoid breaking the law and to help any possible future insurance claim.</p> <p>If another vehicle was involved and you are uninjured check on the other driver and administer first aid to your trained abilities.</p>
<p>Communication: Cell phone if in an area with cell phone coverage. Ensure a charged satellite phone or two-way radio is available and accessible in your vehicle if you know will be in a remote area with no cell phone coverage.</p>
<p>Emergency Level and Notifications:</p> <p>Level One Incident – No damage to vehicle or property, no injury.</p> <ul style="list-style-type: none"> • Contact direct supervisor at the Company. • If vehicle incident has occurred on field site, contact Site Supervisor/Prime Contractor <p>Level Two Incident – Damage to your vehicle and/or someone else’s – no injuries.</p> <ul style="list-style-type: none"> • Call 911 • Notify Company direct supervisor if on highway or within city limits • Notify field site contact, Site Supervisor/Prime Contractor if on field site <p>Level Three Incident – Damage and injury to individual</p> <ul style="list-style-type: none"> • Call 911 and ambulance • Notify Company direct supervisor • Company direct supervisor to notify management/president • If on a field site, notify site supervisor/prime contractor
<p>Emergency Internal and External Contact number(s): Police call 911 See Emergency Contact List</p>
<p>Evacuation Procedures: If your vehicle is in the way of other vehicles or is a hazard where it is sitting put on hazard lights, look carefully before leaving the vehicle, and use your roadside kit florescent cones and place around vehicle. Stay off the road and away from vehicle. If incident occurs in winter months, ensure that you do not have your vehicle running if in deep snow. Do not attempt to get out of the car and walk any distance for help.</p>
<p>Rescue Plan: Stay in vehicle if safe to do so and wait for help to arrive. If vehicle is not in a safe place or partially on highway put your hazard lights on, carefully exit vehicle and wait in a safe area.</p>

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MEDICAL EMERGENCY – First on Scene

Call out for someone to call 911

(If no people around the scene call 911 while staying with a person)

Approach the person in medical distress and check to see if they are conscious.

If a person is conscious, ask them questions such as:

- What happened?
- Do you have any medical history we should know about?
- Do you feel pain anywhere?
- Can you move or sit up?
- Administer first aid only to your first aid training capabilities.

Communication:

Verbally call out to people in the area to call for help. Use a Cell phone to call EMS if no other people are around to help. If in a remote area, ensure a charged satellite phone or two-way radio is available and accessible in your vehicle.

Emergency Level and Notifications:

Level One Incident – Medical aid is not necessary (person has fainted for example)

- Notify Company First Aiders and/or Safety.
- If on the field site, notify the site supervisor/safety.

Level Two Incident – Medical aid is necessary (the person is injured, in pain or needs medical aid)

- Call 911
- Notify Company First Aiders and/or Safety.
- If on the field site, notify the site supervisor/prime contractor/safety.
- Notify the direct supervisor of a person who is in medical distress.
- Notify HR to contact family members.

Level Three Incident – Fatality

- Call 911
- Call Alberta OH&S
- Notify the direct supervisor, management, and President of the company.
- If on field site notify site supervisor/prime contractor/Alberta OH&S
- Only police or medical examiner is to notify the next of kin of a fatality incident.

Emergency Internal and External Contact number(s):

Police call 911

Alberta OH&S 1-866-415-8590

See Emergency Contact List

Rescue and/or Evacuation Procedures:

Stay with the individual in medical distress. Keep people clear and away from the area. Continue to ask questions on how they are doing to track if they are getting better or worse. Keep the person warm (or cool) and comfortable while help arrives. Follow the instructions of the 911 operator.

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INJURY INCIDENT/ACCIDENT - FATALITY

In a case where the accident has resulted in a medical aid injury call 911 immediately.

- Call out for a first aider and stay with the injured person until they arrive.
- Shut down any equipment that may pose additional hazards to the individual or anyone else on the site.
- Keep other workers and visitors back far enough from the scene so they will not become an additional hazard.
- In a serious injury situation, the first aider must never attempt to transport the injured worker to the hospital.
- Conduct notifications and give them the information needed.
- If a fatality has occurred Alberta OH&S must be notified, and the scene of the incident cannot be disturbed in any way (unless it is dangerous to leave as is example: running piece of equipment)
- Do you have any medical history we should know about?

Communication:

Verbally call out to people in the area to call for help. Use a Cell phone to call EMS if no other people are around to help. If in a remote area, ensure a charged satellite phone or two-way radio is available and accessible in your vehicle.

Emergency Level and Notifications:

Level One Incident – First Aid incident – No Medical Aid required.

- Notify First Aider/Safety
- Notify the direct supervisor of the worker.
- If on the work site, notify the site supervisor/safety.

Level Two Incident – Medical aid is necessary (the person is injured, in pain or needs medical aid)

- Call 911
- Notify First Aider
- Notify the direct supervisor of the worker at the company (head office)
- If on the field site, notify the site supervisor/safety.

Level Three Incident – Fatality (see more under Fatality 6.4)

- Call 911
- Alberta OH&S 1-866-415-8590
- Notify the direct supervisor of the worker.
- Supervisor to notify management/president.
- Only police or medical examiner can notify next of kin in the event of fatality

Emergency Internal and External Contact number(s):

Police call 911.

Alberta OH&S Contact information

Operations Manager/Owner (see Emergency Contact List)

Rescue and/or Evacuation Procedures

Keep the area clear and make the area safe by shutting down power. Stay with injured persons and keep them comfortable until help arrives. Do NOT attempt to take the seriously injured person to hospital.

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TOXIC CHEMICAL RELEASE (H2S)

No one from the Company is allowed on any site that poses any chance of H2S or any other toxic chemical without H2S Alive Training and the proper PPE (respirators etc.)

Company workers performing work on a customer’s site who have this risk must have a full orientation on what to do in case of H2S release and the orientation checklist of the information given must be in writing and brought back to the office/supervisor.

H2S is an extremely dangerous gas and can cause instant death. Sites which pose this risk must have training rescue personnel on site with all the appropriate PPE (respirators).

Communication:

Sites that have the potential to have an H2S accidental release should have an alarm system to let everyone know that a hazardous release has taken place. **KNOW WHAT THESE ALARMS SOUND LIKE.**

Emergency Level and Notifications:

Level One Incident – Low Hazard Chemical (outside) gas leak, not H2S

- Notify the Prime Contractor on site and/or site supervisor.

Level Two Incident – Medium Hazard Chemical (outside or inside), not H2S

- Notify the Prime Contractor on site, site supervisor and/or project Management.
- Call 911
- Contact Company – Management.

Level Three Incident – High Hazard Chemical (any H2S release)

- Call 911
- Notify the Prime Contractor and/or supervisor on site.
- Notify Management
- Notify Alberta OH&S and Alberta Environment
- Only the Management of the company to talk to the media.

Emergency Internal and External Contact number(s):

Police call 911

See Emergency Contact List

Rescue and/or Evacuation Procedures

Evacuate the area immediately to an area away from the wind stream to the muster point area and/or follow the prime contractor’s lead or safety rescue team instructions. Stay upwind in a safe area until told what to do next.

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VIOLENT ENCOUNTER

Violence can occur at a workplace, office, driving, while working alone at any work site and especially when working late at night or handling cash. In the case of a violent episode taking place, it will be important to follow the SWP developed in this case and follow the emergency plan procedures.

Communication:

Cell phone or satellite phone and/or two-way radio if in a remote area. When working alone, follow working alone communication procedures.

Emergency Level and Notifications:

Level One Incident – A violent episode occurs without any weapon use or injury.

- Call 911
- Follow SWP and on-the-job training procedures.
- Fill out the Violence in Workplace Report
- Notify your direct supervisor and supervisor to notify the President/Owner

Level Two Incident – Injury sustained, or weapon used during encounter.

- Call 911
- Contact RCMP and/or municipality for shelter locations in the area.
- Notify the company emergency team and/or President and owner.
- The company will contact family members.

Level Three Incident – Serious injury to fatality has happened.

- Call 911
- Company President to be contacted immediately.
- Do not speak with Media.
- Allow emergency responders and police to contact family

Emergency Internal and External Contact number(s):

Police call 911

Management (see Emergency Contact List)

Rescue and/or Evacuation Procedures:

Call 911 and follow rescue and evacuation procedures.

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FIRE OR EXPLOSION

It is fire code for all buildings to be equipped with Type ABC fire extinguishers and generally can be found at all exits of buildings, in highly flammable areas, in company vehicles etc. All employees trained in the use of fire extinguishers are encouraged to use fire extinguishers to put out small fires, however, large fires must not be tackled, and it is mandatory that you leave the building/area and call 911 immediately.

Communication:

Cell phone or satellite phone if in a remote area. Pull the fire alarm. Know what the difference is between fire alarms and H2S gas releases at customer’s sites (during orientation).

Emergency Level and Notifications:

- Level One Incident** – Small fire
 - Notify someone who has fire extinguisher training (first aider?)
 - Notify the on-site supervisor/prime contractor if on field site
- Level Two Incident** – Medium-sized fire
 - Pull the fire alarm, if at an office location
 - Notify all persons near the fire to evacuate
 - Notify the on-site supervisor/prime contractor in the field
- Level Three Incident** – Large fire or explosion
 - Evacuate immediately to muster point
 - Call out to workers around you to evacuate
 - Once in a safe area call 911
 - Notify Alberta OH&S in case of large explosion
 - Notify site supervisor/prime contractor
 - Notification to Company Management

Emergency Internal and External Contact number(s):

Police call 911
 Call Alberta OH&S 1-866-415-8590
 Management (see Emergency Contact List)

Rescue and/or Evacuation Procedures:

Evacuate immediately to the muster point and wait for further instructions. Call 911 and wait for further instructions to be rescued.

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10.4 - EMERGENCY RESPONSE INVESTIGATIONS

DEG ENGINEERING will investigate all emergency incidents and accidents using the Simplified Investigation Process (SIP) and analyze the causation of the emergency incidents using the Loss Causation Model. All key personnel in the emergency investigation team will have training in these two methods.

Simplified Investigation Process (SIP)

- Step 1 – Secure the Scene
- Step 2 – Collect the Evidence
- Step 3 – Analyze the Causes (using the Loss Causation Model)
- Step 4 – Write the Report

Loss Causation Model

- Step 1 – Analyze the Root Causes
- Step 2 – Determine the Basic (Indirect) Causes
- Step 3 – Identify the Direct Causes
- Step 4 – Classify the Incident
- Step 5 – Identify the Loss(es)

10.5 - OFF-SITE EMERGENCIES

Assessment

An initial assessment will be conducted to establish the potential emergencies involved in the worksite of the Company with an appropriate plan developed to respond to minimize the impact of such emergencies on personnel, equipment, and the environment. The initial assessment will include a determination of the Company's response capability in the specific situation and the need for, and identification of any additional resources required in the event of an emergency.

The Company will conduct a risk assessment in any workplace in which a need to rescue or evacuate workers may arise. If the risk assessment shows a need for evacuation or rescue, appropriate written procedures must be developed and implemented, and a worker assigned to coordinate their implementation. (see Emergency Response Plan form).

Employees of the company are required to have an on-site safety orientation when contracted out to customer's sites. The orientation must include emergency response information, including:

- Alarms and warnings.
- ER Plan – nearest hospital.
- Transportation – to transport injured worker to hospital.
- Evacuation plan – Muster Point(s).
- Location of emergency kits – type and location.
- Location of emergency equipment – fire extinguishers, fire doors, sprinklers, etc.

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10.6 - FATALITY

In the event of a fatality, notification must be first made to RCMP/police (911). Alberta OH&S Regulations state that they must be contacted immediately if a fatality should occur. It is important that the scene is not disturbed until RCMP and/or OH&S arrive on site and complete their initial investigation unless it is necessary to administer first aid to injured workers or there is a continued danger to workers and/or the public.

NOTE: SEE EMERGENCY CONTACT LIST FOR INTERNAL AND EXTERNAL PHONE NUMBERS

10.7 - EMERGENCY RESPONSE TRAINING

All new hires must have emergency response training for the Company and at our customers' sites during the orientation process. The training must include:

- Emergency scenarios and plans developed.
- Roles and Responsibilities under the plan.
- Where to locate emergency supplies, first aid kits, eye wash stations, and fire extinguishers.
- Evacuation plan including Muster Point location.
- Emergency notifications and location of ER Contact List.

Key personnel such as supervisors and workers who are part of the emergency response team must have formal emergency response training.

10.8 - EMERGENCY RESPONSE DRILLS

To ensure workers understand and can respond safely in an emergency, and monitor the effectiveness of the plan, emergency drills and actual responses must be conducted at least annually. The drills can take the form of tabletop drills conducted at safety meetings and/or fire evacuation drills. It is mandatory that workers will be included in customer's off-site drills to ensure their safety in an emergency off-site. A written report will be completed immediately following any drill. The Drill Form must provide information as to the date and time of the drill, any deficiencies observed, and corrective action put in place for continuous improvement of the plan. Records for these drills must be kept on file for at least 3 years.

Actual Emergency – ensure to document actual emergencies and add to the company's emergency plans and then conduct drills for the new emergency plan. Ensure an emergency form is completed showing what took place, action taken, what went right and wrong and corrective action.

10.9 - MEDIA COMMUNICATIONS

The Company President/Owner is the only individual who is allowed to speak to the media in the case of a serious emergency event involving the Company.

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DO NOT SPECULATE ON THE CAUSE OF THE EMERGENCY OR PROVIDE THE MEDIA WITH ANY TYPE OF STATEMENT THAT IS “OFF THE RECORD”.

Do not allow the media on-site without permission from the Prime Contractor/Owner of the site. Media must not be allowed on site until the area is safe and admittance will not hamper emergency services or investigations. The media must always be accompanied while on the property.

Workers shall be instructed not to provide any company information either verbally or via social media at any time. Workers will be instructed to direct all inquiries to the General Contractor and/or owner of the site.

10.10 - FIRST AID REQUIREMENTS

DEG ENGINEERING will be following all Provincial OH&S First Aid requirements for our sites.

First Aid Training

New Legislation (March 31, 2023)

First aid training First aid training for workers must now meet CSA Standard Z1210-17 (First aid training for the workplace – Curriculum and quality management for training agencies).

Here’s how this change affects training providers and work site parties. Training providers Approved first aid training providers in Alberta have previously updated the curriculum of their courses as follows:

- “Emergency first aid” equals CSA Standard Z1210-17 “basic first aid”.
- “Standard first aid” equals CSA Standard Z1210-17 “intermediate first aid”.
- “Advanced first aid” equals CSA Standard Z1210-17 “advanced first aid”.

Effective March 31, 2023, training providers must also update course names to align with the national standard. Note: Currently certified first aiders do not need to have new training completed until the expiry of current Standard First Aid training certificates.

Prime Contractor First Aid Needs

How to determine your work site needs Prime contractors – or the employer, if there is no prime contractor – must refer to Tables 4-7 in Schedule 2 of the Occupational Health and Safety Code to determine the level of first aid services, supplies, kits, and equipment they are required to provide at the work site. These tables are updated to harmonize with the national standards. The tables still – as in earlier versions of the code – require the following considerations:

- Whether work performed on-site is classified as low, medium, or high hazard.
- The number of workers per shift.
- The distance the work site is from a medical facility.

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First Aid Kits

First aid kits must now meet CSA Standard Z1220-17 (First aid kits for the workplace). By Director Order, Alberta OHS has permitted employers to use applicable CSA standard kits since May 2022. However, if you are a prime contractor or employer with an Alberta Type P, No. 2, or No. 3 first aid kit at your work site, you may have to add additional items to your kit to meet the new standards.

To help with this, you can use the tables at the end of this resource. These tables compare the previous and current kit requirements. It may also be helpful to understand that the CSA standard organizes first aid kits as follows:

- There are three types of CSA standard kits:
 - Type 1 kits are for personal use.
 - Type 2 is for basic first aid in low and medium-risk environments.
 - Type 3 is for intermediate first aid in higher-risk environments.

- Type 2 and Type 3 CSA standard kits come in three sizes. If your work site requires either a Type 2 or 3 kit, you must figure out what size is required:
 - Small kits are for two to 25 workers per shift.
 - Medium kits are for 26 to 50 workers per shift.
 - Large kits are for 51 to 100 workers per shift.

Signs will be posted indicating the location of the First Aid kits, eyewash stations, MSDS sheets, fire extinguishers, and emergency alarms. Key employees who work out in the field must be trained in Standard First Aid or as per job site requirements.

The on-site prime contractor/supervisor is responsible that all emergency equipment and supplies are on the site and any worker who finds that this is not the case must report back to their direct Supervisor. All employees are to be provided with some type of emergency communication device such as a cell phone, satellite phone or third-party emergency system (panic button/alarm).

The Company mandates that all Supervisors and key employees will be provided with First Aid and/or First Aid training based on site requirements. All training certificates will be kept on file and training will be refreshed before the expiration date.

Emergency transportation

A prime contractor – or the employer if there is no prime contractor – is responsible for developing and implementing an emergency transportation plan. The prime contractor or employer has the flexibility to choose the method of transportation. The emergency transportation plan must ensure the workers’ health and safety are protected during transport to a health care facility. The plan must be suitable for illness or injuries that may occur at the site. Unless there are three or fewer workers at the work site, the prime contractor or employer must ensure ill or injured workers are accompanied by a first aider during emergency transport.

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Location and Accessibility to First Aid Supplies and Equipment

Sections 179 and 181(2) of the OHS Code set out additional requirements for prime contractors and employers in relation to first aid services, supplies, and equipment.

These include requirements related to:

- Location of and accessibility to first aid supplies, equipment, and kits.
- Maintaining and identifying first aid supplies, equipment, and kits.
- Signage related to the location of first aid services, equipment, and kits.
- Ensuring an emergency communication system is in place for workers to summon first aiders.

10.11 - EMERGENCY RESPONSE RECORDS

The company will ensure that all emergency response records, including Drills, First Aid Reports, and Near-missed Reports are kept for a minimum of 5 years. All records of emergency responses, including drills, will be reviewed to correct deficiencies during safety committee meetings with management in attendance.

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SECTION 11 – PROGRAM ADMINISTRATION

11.0 - PROGRAM ADMINISTRATION INDEX

- 11.1 - HEALTH AND SAFETY ADMINISTRATION
- 11.2 - CONTRACTOR INVOLVEMENT
- 11.3 - MANAGEMENT PARTICIPATION
- 11.4 - SAFETY MEETING/SAFETY COMMITTEE
- 11.5 - TERMS OF REFERENCE
- 11.6 - SAFETY MEETING TYPES
- 11.7 - STATISTICS ANALYSIS
- 11.8 - SAFETY PERFORMANCE MEASUREMENT
- 11.9 - AUDITING OF THE SYSTEM

11.1 - HEALTH AND SAFETY ADMINISTRATION

Health and safety issues will be communicated to all employees by means of the following methods:

1. Email communications.
2. Phone call.
3. Verbally.
4. Safety meetings.

New employees must be aware of all health and safety policies including emergency response, incident reporting and Field Level Inspections during the New Hire Orientation process. It is Company policy to ensure that all workers have a means of communicating any health or safety concerns and must always have or own a cell phone. In the event employees are traveling to areas without cell phone coverage another means of communication will be provided to them (satellite phone, two-way radio etc.).

Supervisors must be accessible and available to all workers by means of cell phones or other means at all times in case of an emergency accident or incident. Supervisors are responsible for ensuring toolbox meetings are taking place when more than one person from the company is travelling and working at field sites. Toolbox meetings will be used to inform workers of hazards on the sites and emergency response plans.

All workers will be communicated with in the event of an accident/incident with the goal of making them aware of hazards, incidents and corrective measures put in place to keep them safe while at work. All employees must be aware of any deficiencies found on Field Level Hazard reports and/or inspection reports of the office or work site and corrective action put in place to keep them safe.

Workers must be made aware of the policy and means to communicate any workplace unsafe, unhealthy condition or act by the Supervisor. Workers must be aware that they have a right to refuse unsafe work and must be able to reach their direct Supervisor to report such cases. All unsafe work cases must be in writing and will be reviewed by management.

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Employee Feedback

It is important that all health and safety concerns raised by our employees receive feedback in a timely manner. It will be the responsibility of their direct Supervisor to communicate the results of their health and safety concerns/reports in writing delivered by email and verbally over the phone.

Follow-up on Health and Safety Issues

Follow-up on all reported health and safety concerns will be the responsibility of the Supervisor and/or Safety Committee. Employees will all be made aware of the corrective actions put in place, due dates and completed dates by means of email communication and/or verbally on the telephone.

11.2 - CONTRACTOR INVOLVEMENT

Contractors will be communicated with on health and safety issues in open discussions with the Supervisor and Management. Contractors will be invited to all toolbox meetings and office safety meetings to discuss work projects and safety procedures and sign off on meeting minutes. Contractors must report unsafe and unhealthy conditions and acts at our work sites to our company Manager/Supervisor.

11.3 - MANAGEMENT PARTICIPATION

The foundation of any successful health and safety program is the involvement of management in health and safety and it is mandated by the President of the company that management participate in planned health and safety meetings. The Company's leadership and commitment is achieved through:

- Senior management participation in Health and Safety Meetings, and discussions of various Health and Safety issues with facility employees, and customers on a regular basis, both in corporate and field settings.
- Meeting with clients/contractors on Health and Safety issues to share knowledge and implement best practices.
- Management being directly involved in Health and Safety improvement efforts.
- Awareness of current Health and Safety performance issues and developing and implementing solutions for achievement of continuous improvement in Health and Safety performance.
- Integration of Health and Safety requirements into daily business planning and decision-making processes.
- Leaders who are visible to all employees and openly discuss Health and Safety performance and improvement opportunities with all workers. Clear, two-way communication between management, employees, contractors, and others is critical to improved Health and Safety performance.
- Leaders who will listen to all employees and incorporate new ideas and suggestions wherever and whenever practical.
- Developing, communicating, and implementing the Health and Safety objectives and targets that are realistic and achievable to sustain continuous improvement in Health and Safety performance.
- Management actively fosters a culture that promotes Health and Safety awareness and continuous improvement in Health and Safety performance at all facilities and in the lives of our employees.

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- Keeping abreast of regulatory and legal requirements to ensure full compliance with all Health and Safety requirements in all operating jurisdictions.
- A Health and Safety Manual that is implemented and supported throughout the Company by all management, employees, and contractors.

11.4 - SAFETY MEETING/SAFETY COMMITTEE

Safety Meeting

DEG ENGINEERING will hold health and safety meetings at least quarterly. These meetings will include all employees at all facilities/offices in the province of Alberta under the company's Alberta WCB. Meetings can take place by department or facility/branch as long as all company employees are included. Meetings can be conducted face-to-face or in a teleconference setting. Minutes must be written and signed off by all who attended. The company will include an Agenda and include such items as accident/incident/near miss reports and investigations, corrective action and new policy based on corrective action put in place for reported unsafe conditions and acts. The agenda may include Committee discussions and activities if the company has a committee in place. Employees must be given a platform to provide input and feedback on company health and safety.

Work sites with 5-19 employees (including a total number for all worksites) will be expected to designate and train a safety representative for that site. As soon as the company has a total of 20 or more employees under the Company's Alberta WCB a Safety Committee is legislated by Alberta OH&S. The company will ensure that management is attending, at a minimum (2) meetings per year as part of their health and safety commitment to employees.

Safety Committee

Establishing the Committee

The employer is responsible for setting up the committee. The requirements for establishing a committee are specified in the OHS Act.

A committee must consist of members representing workers and employers.

- Meet regularly.
- Be co-chaired by one worker member and one employer member.
- Receive training so members can contribute fully to the committee's activities.
- Participate in identifying hazards and recommend measures to eliminate or control them.
- All have Joint Health and Safety Committee training.

In Alberta, the committee should have at least 4 members to work well. All Committees must include at least half workers and half Management (including Supervisors). The worker representatives are selected by the workers, or by the union agreement, if one exists. The employer appoints the employer representatives. Names and contact information for the members must be posted at every work site.

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Committee members or representatives can take time away from their regular duties if they are involved in committee work.

This work includes:

- The time the committee determines is needed to prepare for each meeting.
- The time required to attend each meeting.
- The time required to attend approved health and safety training.
- The time required to carry out their duties as listed in the OHS Act, Regulations and Code

Alberta OH&S Legislation

Committee members

The HSC must ensure that at least half represent the workers:

- worker representatives are selected by the workers for a term of not less than one year unless prescribed by a union agreement.
- employer representatives are assigned by the employer.

Each committee must have 2 co-chairs:

- The worker co-chair is chosen by worker members.
- The employer co-chair is chosen by employer members.

Meeting requirements

HSC meetings must adhere to the requirements outlined in the *OHS Act* to be considered a valid meeting:

- HSC members must meet within 10 days after being established, and then once every quarter.
- Health and safety meetings and functions are to be carried out during normal work hours. Employers can't deduct wages for time spent in HSC meetings or carrying out duties as a committee member.
- Meeting minutes must be recorded and available for inspection by an HSC member or OHS officer.
- Meetings must meet quorum for the committee to make decisions.

Committee and safety representatives have the following duties:

- Receive and address concerns and complaints about the health and safety of workers.
- Develop and promote ways to protect workers, and to check that the steps taken were effective.
- Making recommendations to improve the health and safety management system.
- Participating in hazard and control identification. Review and revision of Formal Hazard Assessments.
- Develop and promote health and safety education and training.
- Participation in investigations.
- Developing and promoting health and safety measures, and checking effectiveness.
- Make recommendations to the employer/Management.
- Inspect the work site at least once before each meeting to identify uncontrolled health and safety hazards.

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- Investigate serious injuries and incidents.
- Maintain records pertaining to the committee associated with all its duties.
- Cooperate with an occupational health and safety officer when that officer is exercising duties under the Occupational Health and Safety Act (OHS Act), the Regulations and the OHS Code.

Duties of the Employer:

- Consult and cooperate with HSCs and HS representatives to develop policies, procedures, and codes of practice for their work sites.
- Provide committees and representatives with reasonable opportunity to inform workers on OHS matters.
- Allow committee members and representatives to examine records, policies, procedures, codes of practice, reports or manufacturer specifications required under OHS legislation.
- Give information or documents addressed to the HSC or HS representative as soon as possible after it is received.

In consultation with the HSC or HS representative, the employer must:

- Develop and implement the violence prevention plan and the harassment prevention plan.
- Review the violence and harassment prevention plans when an incident occurs, when the committee or representative recommends it, or every three years.

11.5 - TERMS OF REFERENCE

Purpose and Objectives of the Committee

Section 197 of the OHS Code says that an HSC’s terms of reference must include:

- The term of office for HSC members.
- How often the HSC meets and how it keeps records.

Processes for:

- Selecting co-chairs.
- Selecting worker members that represent the employer’s workers.
- Conducting meetings.
- Forwarding health and safety concerns to the employer.
- Replacing a member during their term of office.
- Resolving disputes if the HSC members can’t agree on a recommendation to the employer.
- Addressing circumstances where HSC members are not carrying out their duties.

These are minimum requirements only. HSCs can include other processes or requirements in their terms of reference, as needed to carry out their role and duties.

Replacing a Member During Their Term in Office

A member of the Committee can terminate their seat after one full year on the Committee. They will inform the Committee in writing with their termination date and signature.

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Replacing a Member Due to Not Fulfilling their Duties

The Committee may replace a sitting member if they are deemed to not be fulfilling their duties and/or not attending meetings. The Committee must write a Letter to the member explaining why they feel they are not fulfilling their duties which must be signed off by the sitting member and all Committee members.

Membership Structure

Part 13 of the OHS Code gives further direction about HSC membership. Under the code, employers must decide how many worker members the HSC needs and set a reasonable timeframe for the selection. The number of worker members must fairly represent both unionized and non-unionized workers. There also must be the right number and type of worker.

Training

Under the OHS Code, employers must train HSC members or HS representatives. The training must include:

- The roles and responsibilities of co-chairs, HSC members and HS representatives.
- Work site party obligations.
- Worker’s rights under the OHS Act.

Employers can develop and provide the training themselves or use an outside training provider.

Posting names of committee members or health and safety representatives 199.1

The employer must:

- a) maintain a record of the names and contact information of the members of the joint health and safety committee or health and safety representative, and
- b) conspicuously post contact information for the joint health and safety committee or health and safety representative at every work site where workers are represented by the committee or representative, or by another means as agreed to by the joint health and safety committee or health and safety representative.

The Company’s health and safety committee’s objectives will include:

- Responding to worker’s health and safety concerns and complaints.
- Participating in hazard and control identification.
- Developing and promoting health and safety education and training including workplace harassment and violence.
- Conducting inspections of the work site.
- Participation in investigations.
- Developing and promoting health and safety measures and checking effectiveness.
- Making recommendations to improve the health and safety management system.
- Maintaining records pertaining to the committee associated with the above duties.

Receipt, Consideration and Disposition of Employees Health and Safety Concerns/Complaints

The Committee and/or management will receive health and safety concerns and complaints from the Workers Safety Rep and/or directly from the worker/employee. Once a health or safety concern or

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complaint has been reported it will be up to management to take on responsibility to receive, review and put in place corrective action. If a committee is in place, the Committee will review the concern/complaint and provide suggestions and input before forwarding it to management for final approval. Once the approval has been granted the resolution or corrective action will be presented to the Supervisor and communicated to the worker/employee for implementation.

Note: It is mandatory that all Worker reported health and safety concerns reported to be kept confidential by the Committee and the names of those **employees kept confidential** in any posted minutes or reports.

Reporting Procedures

The committee will report its recommendations in writing to the employer. The employer may designate a manager who has the knowledge and authority to act on health and safety matters.

Note: In Alberta, the employer or prime contractor must either resolve the issue within 30 days or respond in writing within the 30-day timeframe and state how the concern will be addressed and when. The response must include a timetable, and if any interim control measures will be used. If they do not agree with the concern, they must give reasons why they disagree with the recommendations or state why they do not believe there is a concern.

Duties and responsibilities of Committee Members – Membership Succession Strategy

- Attending meetings.
- Promoting health and safety in their area of work.
- Making recommendations to improve work site health and safety.
- Helping to resolve HS concerns.
- Must serve on the committee for one full-year term.
- Has the option to leave after one full year or stay if there are no other employees who would like to participate.
- The committee should aim to rotate members year after year to ensure that anyone at the company who wishes to participate can do so.
- Give at least 30 days’ notice of departure when leaving the committee.
- Confidentiality.

Duties of Co-chairs

Co-chairpersons will have extra responsibilities. If an OHS officer conducting a work site inspection requests it, the co-chair representing workers, the co-chair’s designate, or the HS representative will accompany the officer on the inspection. Co-chairs must have JHSC training for their roles.

Other duties may include:

- Scheduling meetings and notifying members.
- Preparing the agenda.
- Inviting specialists or resource people, as needed.
- Chairing and leading the meetings.
- Reviewing and signing the minutes.

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- Acting on behalf of the committee between meetings.

Duties of Safety Representative – Worksite and HCS Coordination

The duties of the Health and Safety Representative are found in the OHS Act under Sections 13 and 14 and the same as the HSC and include:

- a. the receipt, consideration and disposition of concerns respecting the health and safety of workers.
- b. participation in the employer’s hazard assessment.
- c. the making of recommendations to the employer respecting the health and safety of workers.
- d. review of the employer’s work site inspection documentation.

It is mandatory that all worker-reported health and safety concerns reported to be kept confidential by the Committee and the names of those **employees kept confidential** in any posted minutes or reports.

HSC and HS representative duties

The core duties of an HSC are set out in section 13(6) of the OHS Act. These are:

- The receipt, consideration and disposition of worker health and safety concerns.
- Participating in the employer’s hazard assessment process.
- Making recommendations about worker health and safety to the employer.
- Reviewing the employer’s work site inspection records. HS representatives perform the same duties as HSCs. However, they can modify these as needed because they are one person (not a group). Alberta OHS officers may ask an HSC member, their designate or the HS representative to accompany them on inspections. Employer duties Related general duties Part 1 of the OHS Act sets out general obligations for all regulated work site parties. An employer’s general duties include requirements related to both HSCs and HS representatives.
- Employers must ensure, as far as reasonably practicable, that health and safety concerns raised by workers, supervisors and the HSC or HS representative are resolved in a timely manner.
- Employers must ensure that HSCs or HS representatives comply with their legislated HSC or HS representative requirements.
- Employers must make health and safety information related to work site hazards, controls, work practices and procedures readily available to workers, HSCs, HS representatives or prime contractors.
- Employers must make sure that workers and the HSC or HS representative have ready access to the OHS legislation. Part 13 Code requirements Part 13 of the OHS Code sets out requirements for employers in relation to HSC and HS representatives. Along with their duties in relation to establishing HSC membership, employers must:
 - Ensure the HSC develops a written term of reference that includes the elements specified in the code. (See below.)
 - Keep a record of HSC member or HS representative names and contact information.
 - Clearly post how to contact the HSC or HS representative at all applicable work sites. (Or share by another means if the HSC or HS representative agrees.)
 - Keep HSC special meeting minutes readily available for two years, in case either an HSC member or Alberta OHS officer wants to see them.
 - Ensure HSC members or HS representatives are trained per code requirements.

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Other legislated requirements

Other provisions of the OHS Act and Code include employer requirements related to HSCs or HS representatives. These support the HSC and HS representative's core duties and their role in an effective internal responsibility system. Health and safety committees and representatives.

For example, according to the OHS Act, employers must report work refusals to the HSC or HS representative as soon as possible. Employers also must provide specific reports – such as work refusal reports or certain investigation reports – to the HSC or HS representative. Also, from the OHS Code, there are a few employer requirements related to HSCs or HS representatives.

- Section 22(3) requires employers to inform the HSC or HS representative about worker overexposures, in writing.

Workers at field sites will be responsible for ensuring a Safety Rep is designated when more than one employer or company is working at the site and 5 or more workers are working on the site for 90 days or more. If there are 20 or more workers on the work sites, including all workers and self-employed workers on the site, for 90 days or more it will be the responsibility of the Prime Contractor to ensure a safety meeting takes place. If there is no Prime Contractor on the site, the Safety Committee with the company will be responsible for ensuring these requirements take place.

Safety Committee Meeting Guidelines

Frequency of Meetings will be held monthly and **on** the same day of the month to ensure consistency.

Meeting Time: The meeting time must be convenient for all committee members and should be set in advance.

Attendance: The meetings must strive to have full attendance but must have at least a quorum to go forward.

Quorum is the minimum number of HSC members who must be present at a meeting to carry out valid business. At least half of the members must be present for there to be a quorum. Both worker and employer members must be present with at least half of those present being worker members.

Agenda: All meetings must have a written Agenda developed by the Chair or Co-Chair of the meetings at least one week in advance and distributed to each member. Members should be prepared for the meetings by reviewing the agenda.

Minutes for the meeting: The Committee must establish in advance who will be writing the minutes for the meeting. It is suggested that the Co-Chair(s) take responsibility for the minute writing.

Note: In Alberta, minutes of each meeting must be recorded, and an approved copy given to the employer within 7 days after the meeting. Copies must also be posted or provided electronically at the

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work site within 7 days after the meeting. Copies of the meeting minutes must be kept for 2 years and be available to a committee member or OHS officer when requested.

Dispute and Resolution Procedure

Whenever possible, decisions should be made by discussing the issue and coming to a consensus. Once a course of action has been chosen management must be sent a report and action plan developed by the Committee which will include who is responsible and a timeline for resolution and follow-up. Post minutes to show that issues have been discussed and followed up.

Committee Authority

Committees have authority as well as responsibility. In Alberta, committees can:

- Ask the employer to provide information about worksite hazards.
- Carry out work site inspections.
- Participate in resolving health and safety complaints.
- Participate in accident investigations and make recommendations.
- Participate in resolving work refusals.
- Monitor compliance with laws.
- Recommend remedial action.

Work Site Inspections

Inspections are not only important; they are required under legislation. Committees assist in planning, conducting, reporting, and monitoring inspections.

Inspections allow a committee to:

- Ask workers and supervisors about their concerns.
- Gain more knowledge about jobs and tasks.
- Identify existing and potential hazards.
- Determine the underlying causes of hazards.
- Recommend corrective actions.

Inspection schedule

Occupational health and safety legislation requires that inspections be conducted at least once each quarter before committee meetings.

The committee may choose to increase the number and frequency of these inspections depending on:

- History of injuries and incidents.
- Size of the work site.
- Number of workers.
- Types of equipment and processes.
- Number of work shifts (especially if activities vary depending on the shift).
- Introduction of new processes or machinery.

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Work Site Accident Investigations

The Committee will review and advise all workplace incidents, accidents, work refusals and workplace harassment reports. The purpose of an investigation is to find the root cause(s).

Work Refusal Investigations

A worker has the right to refuse to work if they believe their safety (or the safety of a co-worker) is in danger.

Steps involved in reporting and resolving a refusal to do dangerous work are outlined in the *Occupational Health and Safety Act*.

The worker co-chair, the health and safety representative, or if neither one is available, then another worker selected by the refusing worker may be asked to accompany the employer and worker when an inspection is done.

The committee should also receive a copy of the report that is completed after the inspection about the refusal to work, the inspection and the action taken, if any.

Steps for a Work Refusal

Work refusals could involve several different parties at the work site. Below is a summary of the steps that involve the committee or representative:

- If a worker believes that the assigned work is dangerous, the refusal and the reason for the refusal are promptly reported to the employer or supervisor.
- If the dangerous condition is not remedied immediately, the condition is inspected by the employer, the worker, and the committee worker co-chair.
- When the inspection is completed, the employer will prepare a written report of the refusal, the inspection, and the action taken.
- A copy of the report is provided to the worker and the committee.

11.6 - SAFETY MEETING TYPES

Pre-Job Meetings

These meetings are held at the beginning of every project. Pre-job risk assessments must be completed by the planning team in the planning stages of the job to capture and control or eliminate risks associated with the work to be completed, the work location, or environmental factors before any work commences.

Daily Toolbox meetings

These meetings will be held at each new job site to discuss any concerns that may arise. All workers/contractors are to attend these meetings. Toolbox meetings are held in between scope changes on projects. Toolbox meetings must be held for workshop employees at least weekly. Action items arising from the meeting will be assigned to specific personnel for resolution, given a specific completion date, with the action reviewed at subsequent meetings, until they are satisfactorily resolved.

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11.7 - STATISTICS ANALYSIS

The Company will track and review all types of incident and accident statistics with the goal of being aware of and learning which job tasks, equipment or work environments seem to have recurring (trends) incidents and accidents to control the hazards and risks involved.

Statistics will be tracked and maintained using the safety committee/toolbox meeting form and reviewed at each meeting. WCB reports (rate sheets) will be reviewed with all workers and management.

A quarterly statistic report will be prepared by the Company. It will include:

- The name of the employer.
- The average number of employees.
- Hours worked for the month and cumulative.
- First-aid for the month and cumulative.
- Medical assistance for the month and cumulative.
- Time lost for the month and cumulative.
- Days lost for the month and cumulative.
- Frequency for the month and cumulative.
- Severity for the month and cumulative.

11.8 - SAFETY PERFORMANCE MEASUREMENT

DEG ENGINEERING has developed a system for measuring and monitoring the Safety performance of employees and contractors to ensure that the responsibility for health and Safety at the work site is fulfilled. The Company will evaluate the outputs of the system/process to verify its effectiveness.

The following are some measuring/monitoring system processes:

- Instruct employees on-site to investigate all accidents/incidents and submit all documentation to head office.
- Require that all accidents/incidents be analyzed and discussed by the contract employees during a Safety meeting.
- Ensure that the contractor employees are identifying, reporting, and recording hazards on the site.
- Ensure that the contractor employees are correcting the hazards identified.
- Ensure that critical or repetitive hazards are discussed by the contractor employees during a Safety Meeting.

11.9 - AUDITING OF THE SYSTEM

The Company shall ensure that the COR audit is conducted annually, and an Action Plan developed for deficiencies identified from the COR audit process.

The Company will develop an Action Plan based on the deficiencies noted in the SECORCOR audit report. The Action Plan will include:

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- The deficiency noted.
- The recommendation for improvement.
- Corrective Action.
- Corrective action due date.
- Corrective action completion date.

The Action Plan must be developed by the Project Management and reviewed at the Safety Meeting or through email communication with all employees. Both Supervisors and Managements will review and sign the Action Plan report.

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SECTION 12 – MULTIPLE EMPLOYERS ON THE WORKSITE

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- 12.1 - POLICY FOR EMPLOYERS, VISITORS AND SELF-EMPLOYED PERSONS ON WORK SITES
- 12.2 - EVALUATION AND SELECTION OF WORK SITE EMPLOYERS
- 12.3 - WORK SITE COMMUNICATION WITH EMPLOYERS
- 12.4 - NON-COMPLIANCE OF CONTRACTORS AND/OR SELF-EMPLOYED PERSONS ON-SITE

12.1 - POLICY FOR EMPLOYERS, VISITORS AND SELF-EMPLOYED PERSONS ON WORK SITES

DEG ENGINEERING is committed to providing a safe and healthy workplace for our employees, clients, contractors, and visitors. Our safety program is dedicated to protecting all persons working in or visiting our workplace.

Obligations of work site parties

The OHS system is grounded on the principle that everyone in the workplace is responsible for health and safety in the workplace.

- **Employers** are responsible for:
 - ensuring the health, safety and welfare of workers and the public.
 - Provide competent supervisors, training workers, and prevent violence and harassment.
 - working with the joint work site health and safety committee or health and safety representative.
- **Supervisors** have legal responsibilities for OHS and are responsible for preventing violence and harassment.
- **Workers** are responsible for protecting their own and others' health and safety at work sites and refraining from violence and harassment.
- **Contractors** are responsible for ensuring that work under their control does not endanger health and safety.
- **Prime contractors** are required in construction, oil and gas work sites or any other projects that are designated by the OHS director. They would also have added responsibilities to ensure worker health and safety.
- **Owners of work sites** are responsible for ensuring that property under their control does not endanger health and safety.
- **Suppliers** must ensure their products are safe to use and must include user instructions for all equipment, including leased equipment. They would also have to provide a notice when their product or equipment doesn't comply with the law.
- **Service providers** must ensure the services they provide comply with the laws, are provided by a competent person, and do not create a hazard.
- **Self-employed persons** have responsibilities to ensure they do not create a hazard to others and to comply with OHS laws.

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To meet this goal our management requires anyone who will be performing work on our site to be aware of our health and safety requirements which have been developed to reduce the risk of injury.

Responsibilities will include:

- providing an effective communication system.
- communicate health and safety responsibilities.
- conduct pre-job hazard assessments.
- communicate worksite hazards and controls.
- communicate changes to the jobsite.
- reporting unsafe work conditions.
- refusing to carry out unsafe work.

Management recognizes and accepts the responsibility to provide a safe and healthy work environment to all its employees.

This includes:

- Provide safety leadership and training.
- abiding by all applicable government acts, regulations, and legislation.
- employing only certified employees.
- monitoring worksites and employee work habits.

Anyone who performs work on our sites shall conform to appropriate safety and health regulations, including but not limited to Alberta’s Occupational Health and Safety Act, Regulation or Code and any other legislation or practice which will aid in meeting the requirements of a safe and healthy workplace.

Personnel performing work on our site are responsible and accountable for:

- maintaining WCB coverage and keeping their account in good standing.
- Provide the company proof of General Liability Insurance (\$2 million minimum).
- maintaining safe work habits.
- reporting hazardous conditions.
- wearing applicable PPE.

12.2 - EVALUATION AND SELECTION OF WORKSITE EMPLOYERS

DEG ENGINEERING will ensure that all sub-contractors and/or self-employed persons working with the company on any work site meet with the rules and policy of this company and with provincial legislation. All sub-contractors and/or self-employed persons must go through a pre-qualification process which will include a pre-qualification checklist prepared by the company. The pre-qualification check will identify if the company or worker has a safety program, supervisor with safety training on the work site, skills, and expertise to perform the work and operate the machinery and equipment they will be using on the sites, WCB clearances, insurance etc.

*See Sub-Contractor Pre-Qualification Form.

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Monitoring Contract Workers

The Company will ensure that all sites of which sub-contractors and/or self-employed workers hired by the Company are being supervised and/or randomly checked to ensure compliance with Company rules and policies as well as principal legislation. All employees, contractors and self-employed persons on work sites must complete a Field Level Hazard Assessment daily and a copy must be sent in for the Safety Committee at the company to review.

Management of Sub-Contractors

The company will monitor and evaluate sub-contractors safety performance by doing the following:

- Have sub-contractors sign a sub-contractor Acknowledgement form which includes health and safety rules for the site.
- Have sub-contractors fill out a pre-qualification checklist that includes what equipment they will be bringing to the work site and submittal of safety training records for the use of tools and equipment they will be using.
- Ensure WCB status in good standing.
- Ensure sub-contractors have a health and safety program and/or COR/SECOR.
- Check on membership to Complyworks or other sub-contractor evaluation systems.
- Contractors must use the following forms for the company to check and monitor safe work performance:
 - (1) Acknowledgement form.
 - (2) Contractor pre-qualification form.
 - (3) Site Plan.
 - (4) Hazard Assessments for the job tasks they will be performing on the work site.
 - (5) Injury and accident reports and statistics form.
 - (6) FLHA's and site inspection form.

Orientation

All worksite parties must go through a health and safety orientation that will go over the rules and policies of the company, emergency plan, legislation access, work site hazards and controls, health, and safety responsibilities, etc. Contractors will have a site orientation completed as well as pre-qualification and acknowledgment of company rules. Visitors to the company worksites must be signed into the site and always escorted. Worksite parties can include other employers and/or self-employed persons, suppliers, prime contractors, etc. conducting activities at a work site or receiving products. Should any change occur on the worksite all parties on the worksite must be made aware of any new health or safety hazards that could affect them.

12.3 - WORKSITE COMMUNICATIONS WITH EMPLOYERS

Health and safety information (e.g., Hazards assessments, inspections, emergency response procedures, safe work practices/procedures, investigations, HSC and/or HS representative meeting minutes etc.) will be communicated to all persons on the work site. Communication of all persons on site may include:

- Field Level Hazard Assessments.
- Toolbox meetings.
- Safety meetings.

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12.4 - NON-COMPLIANCE OF CONTRACTORS AND/OR SELF-EMPLOYED PERSONS ON-SITE

Any employee, contractor, or self-employed person on the worksite who is found to be non-compliant to the Company's Health and Safety policy and rules may be asked to leave the work site by the Prime Contractor or Supervisor on the site. If the Company is not the Prime Contractor or Supervisor for the work site, the Company will contact those involved and hold a meeting to review the non-compliance issue for resolution.

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