



# Health, Safety & Environment (HSE) Manual

*Injury & Illness Prevention Program – IIPP*

**The Rafter D Corporation**

Version 1.0  
February 2018



## Table of Contents

<b>1.0</b>	<b>Introduction .....</b>	<b>4</b>
<b>2.0</b>	<b>Policy and Administration .....</b>	<b>6</b>
2.1	The Rafter D Corporation Health, Safety & Environmental (HSE) Policy .....	6
2.2	Health, Safety & Environment Overview .....	7
2.3	The Rafter D Corporation’s Philosophy Regarding Injury & Illness Prevention Program (IIPP) .....	8
2.4	General Regulations .....	8
2.5	IIPP Roles and Responsibilities .....	8
2.6	Responsibility of The Rafter D Corporation Management .....	8
2.7	General Health & Safety Program Requirements .....	9
2.8	Specific Responsibilities & Compliance .....	10
2.9	Health & Safety Reporting .....	16
2.10	Posting of Information .....	16
2.11	Worker’s Right to Refuse Dangerous Work .....	16
<b>3.0</b>	<b>Safe Work Practices and Procedures .....</b>	<b>17</b>
3.1	Safe Work Practice and Safe Job Procedure Policy .....	17
3.2	Safe Work Practices.....	18
3.3	Safe Job Procedures .....	18
<b>4.0</b>	<b>Company Rules &amp; Enforcement.....</b>	<b>19</b>
4.1	Enforcement of HSE Rules.....	19
4.2	Safety Rules .....	19
4.3	General Safety Rules and Expectations.....	20
4.4	Environmental Expectations .....	22
4.5	Use of Tobacco Products.....	23
4.6	Fire Preparedness & Reporting .....	24
4.7	Cell Phone Usage Policy .....	24
<b>5.0</b>	<b>Hygiene .....</b>	<b>25</b>
5.1	Respirator Use.....	25
5.2	Fit for Duty .....	26
5.3	Work Place Bullying and Harassment Practice / Policy .....	33
<b>6.0</b>	<b>Health &amp; Safety Education and Training .....</b>	<b>39</b>
6.1	Training Practice.....	39
6.2	Training & Instruction .....	39
6.3	Worker Orientation.....	40
6.4	Visitor Orientation.....	41
6.5	Specialized Training.....	41
6.6	Follow-up on Training .....	41
6.7	Communications .....	42
<b>7.0</b>	<b>Supplementary Programs.....</b>	<b>42</b>
7.1	Asbestos Safety Program .....	42
7.2	Violence in the Workplace Practice / Policy.....	43
7.3	Environmental Protection Practice / Policy .....	44
7.4	Young/New Workers and Short Service Employees .....	47
7.5	Working Alone Program.....	49
<b>8.0</b>	<b>Workplace Inspections .....</b>	<b>51</b>
8.1	Inspection.....	51
8.2	Planned Inspections .....	51
8.3	Informal Inspections .....	51



8.4	Hazard Classifications (Class A, B, C) .....	51
8.5	Preparing for Inspections .....	52
8.6	Performing the Inspection .....	52
8.7	After the Inspection .....	52
8.8	Vehicle Pre-trip Inspection – Commercial Vehicles .....	53
8.9	Mobile Equipment Pre-Trip Inspections .....	53
8.10	Tools and Safety Equipment .....	53
<b>9.0</b>	<b>Hazard Identification, Assessment, Elimination &amp; Control .....</b>	<b>53</b>
9.1	Hazard Assessment .....	53
9.2	Training .....	53
9.3	Introduction – Hazard Assessments .....	53
9.4	Job /Task Hazard Risk Assessment .....	55
9.5	Conducting Hazard Risk Assessment.....	56
9.6	Hazard Control Measures.....	57
9.7	Engineering Controls.....	57
9.8	Administrative Controls .....	57
9.9	Critical Task Risk Management .....	58
9.10	Hazardous Environments .....	58
9.11	Environmental Controls .....	60
9.12	Hearing Protection Program .....	61
9.13	OSHA Hazard Communication Standard (HZCOM) .....	63
9.14	Electrical Safety .....	64
9.15	Lock-Out/Tag-out .....	65
<b>10.0</b>	<b>Accident / Incident Investigation Procedures .....</b>	<b>65</b>
10.1	Accident / Incident Investigation .....	65
10.2	Immediate Notice of Certain Accidents .....	66
10.3	Accident Investigation Overview.....	66
10.4	How to Begin an Accident / Incident Investigation .....	67
10.5	Conducting the Investigation .....	67
10.6	Writing the Report .....	68
<b>11.0</b>	<b>First Aid Services and Equipment .....</b>	<b>69</b>
11.1	First Aid .....	69
11.2	First Aid Service Requirements .....	69
11.3	First Aid Procedures .....	69
11.4	Serious Injuries .....	69
11.5	Exposure to Blood-borne Pathogens .....	70
11.6	First Aid - Personal Protective Equipment (PPE) .....	71
11.7	Clean Up Procedures.....	71
<b>12.0</b>	<b>Labour/Management Health and Safety Committee .....</b>	<b>72</b>
12.1	Health & Safety Committee .....	72
12.2	Overview .....	72
12.3	Posting of Information .....	73
12.4	Committee Responsibilities.....	73
12.5	Toolbox Meetings.....	73
12.6	Toolbox Meeting Checklist.....	74
<b>13.0</b>	<b>Records and Statistics .....</b>	<b>74</b>
13.1	Statistics Practice .....	74
13.2	Written IIPP & Documentation Requirements.....	75
13.3	Statistics .....	76
<b>14.0</b>	<b>Personal Protective Equipment .....</b>	<b>77</b>



14.1	Personal Protective Equipment.....	77
14.2	Overview .....	77
14.3	Applications/Exceptions.....	78
14.4	Responsibilities .....	78
14.5	Required Personal Protective Equipment.....	78
<b>15.0</b>	<b>Emergency Preparedness .....</b>	<b>86</b>
15.1	Overview .....	86
15.2	Posted Emergency Information .....	86
15.3	Emergency Response Team .....	87
<b>16.0</b>	<b>Maintenance Program.....</b>	<b>88</b>
16.1	Maintenance Overview .....	88
16.2	Maintenance Program .....	88
16.3	Maintenance Personnel Qualifications .....	89
16.4	Equipment Inventory .....	89
16.5	Maintenance Records .....	90
16.6	Monitoring .....	90
<b>17.0</b>	<b>Fire Prevention.....</b>	<b>91</b>
17.1	Fire Protection Devices .....	91
17.2	Fire Prevention Responsibilities.....	92
<b>18.0</b>	<b>Health &amp; Safety Program Regular Review .....</b>	<b>94</b>
18.1	Overview .....	94
18.2	Purpose of the Review .....	94
18.3	Focus of the Review .....	94
18.4	Program Audit .....	95
<b>19.0</b>	<b>Fleet Risk Management.....</b>	<b>95</b>
19.1	Motor Vehicle Safety.....	95
19.2	Driver Records.....	96
19.3	Hours of Service Records .....	96
<b>20.0</b>	<b>Disability (Injury/Illness) Management .....</b>	<b>99</b>
20.1	Return to Work Program.....	99
20.2	Return to Work Program Defined .....	99
20.3	Mission Statement .....	99
20.4	Program Scope .....	100
20.5	Program Objectives.....	100
20.6	Program Benefits.....	100
20.7	Immediate Transitional Work Defined.....	100
20.8	Roles and Responsibilities of Participants.....	100
<b>21.0</b>	<b>Project HSE &amp; IIP Program.....</b>	<b>101</b>
<b>22.0</b>	<b>Use of Subcontractors .....</b>	<b>104</b>
<b>23.0</b>	<b>Health &amp; Safety Manual Review Log.....</b>	<b>105</b>

## 1.0 Introduction

This document provides a description of the “The Rafter D’s” Injury and Illness Prevention program. The Injury and Illness Prevention Program (IIPP) is a written workplace safety program.



The goal of the IIPP is to ensure employees work safely in a healthy and injury and occupational disease-free workplace. An effective IIPP improves the safety and health in our workplace and reduces costs by good management and employee involvement.

The 8 required Injury and Illness Prevention Program elements are:

- Responsibility
- Compliance
- Communication
- Hazard Assessment
- Incident / Accident investigation
- Hazard Identification
- Training
- Record Keeping

The IIPP involves all employees, supervisors, and managers and identifies specific workplace hazards employees are exposed to and the program requires identification, assessment, elimination and/or control of hazards in an appropriate and timely manner.

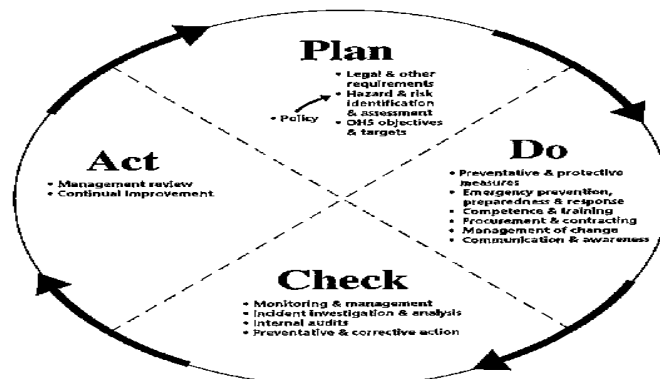
The IIPP is designed to aid in reduction of risk associated with the activities, products and services of The Rafter D operations to a value considered as low as reasonably achievable (ALARA). Risk reduction is primarily achieved through the effective execution of operational controls and proper job planning.

Together these constitute the basis of The Rafter D control strategy over Occupational Health and Safety (OH&S) risks. The IIPP is comprised of nineteen elements that make up the systematic process for managing OH&S risks. This document describes the elements required for program effectiveness.

This approach is consistent with the plan- do-check-review principles as in Figure 1 below:

The Rafter D Corporation best practice IIPP includes additional elements beyond the 8 Elements required for a basic IIPP Program. The Rafter D Corporation IIPP involves all employees, supervisors, and managers. The IIPP identifies the specific workplace hazards employees are exposed to and the program requires identification, assessment, elimination and/or control of hazards in an appropriate and timely manner.

Having a safe & healthy workplace is a goal that is shared between management, supervisory staff and employees alike.





The contents of this manual are intended to compliment overall health & safety efforts of The Rafter D Corporation.

This IIPP applies to all existing operations owned and operated by The Rafter D Corporation.

This manual is not and cannot be used as a definitive guide to legislated health and safety requirements. This guide must be used in conjunction with Federal, State, and Municipal safety requirements, as well as any additional rules, procedures, programs and written instructions developed by The Rafter D Corporation. **The contents of this manual must be used in conjunction with:**

- State OSHA regulations
- OSHA Hazard Communication Standard (Hazcom)
- OSHA Toxic Substance Control Act
- State Health & Safety Codes
- State Highway Traffic Acts
- State Electrical Codes
- Applicable legislation in all USA States in which we work

Depending on the state in which work is being conducted, a legislative body is used to carry out much of its duties and orders. These state legislative bodies are charged with enforcing all safety and health standards adopted by the board. This is accomplished by effective standards encouraging employers to maintain safe and healthful working conditions, and by providing research, information, education, training, and enforcement of Occupational Safety and health.

When designing this manual, the OSHA Regulations/Codes were taken into consideration.

All elements described in this program document and further direction, expectations and guidance are provided in the corresponding or subordinate Performance Standards, Safe Work Practices, Safe Job Procedures, Codes of Practice, Handbooks and Forms that comprise The Rafter D Corporation IIPP HSE Manual.

## 2.0 Policy and Administration

### 2.1 The Rafter D Corporation Health, Safety & Environmental (HSE) Policy

*This policy defines The Rafter D's commitment to protecting the health and safety of all those who either directly or indirectly be affected by its business activities and to minimizing any adverse effects to the environment.*

*The Rafter D Corporation is committed to achieving "zero" work- related injuries or illness to our employees, contractors and visitors on all our work locations.*

*We believe that occupational health, safety, and environmental management, and the continual improvement of our knowledge and practices in these areas, contributes to our competitive strengths. This benefits our employees, stakeholders, customers, suppliers, and the communities in which we operate.*

*As part of our commitment to occupational health, safety and the environment, we will:*



- *Treat safety in the workplace and care of the environment as our primary responsibility;*
- *Consider occupational health, safety, and environmental factors, when making planning, purchasing and operational decisions;*
- *Foster greater engagement and communication to continuously improve our occupational health, safety and environmental management practices, and performance;*
- *Maintain accreditation in externally recognized occupational health, safety and environmental management systems and the Partnerships in Injury Reduction program;*
- *Identify risks to health, safety and the environment, and establish appropriate programs and procedures to reduce these risks to an acceptable level;*
- *Develop and maintain standards of performance, which meet or exceed legal, regulatory requirements and industry standards, and provide the training necessary for employees and contractors to understand and meet these standards;*
- *Hold all levels of management accountable for providing leadership, visible commitment, direction and resources to meet our health, safety and environmental goals;*
- *Promote and maintain communications with the public affected by our operations so we can address their concerns;*
- *Employees and contractors are expected to familiarize themselves with these resources and use them to assist them in fulfilling job responsibilities;*
- *Meet or exceed all applicable occupational health, safety and environmental legal requirements.*

X   
\_\_\_\_\_  
Dean Gainor  
President

February 24, 2018

## 2.2 Health, Safety & Environment Overview

The Rafter D Corporation is committed to the health and safety of all employees, contractors, clients, and the public. The goal of our HSE policy and Injury & Illness prevention program, which is detailed within this HSE manual, is to have an incident free environment and to ensure accidental loss does not occur.

This policy acknowledges that every worker has the right to a safe and healthy work environment. The Rafter D Corporation is committed to involving workers through their representatives and Joint Health and Safety Committee as required to promote a healthy and safe work environment.

All employees, agents, representatives and subcontractors of The Rafter D Corporation are responsible for ensuring the HSE manual is followed. Employees at every level are responsible and accountable for themselves and others around them. We have included a copy of our HSE Manual as well as the Table of Contents for all our Safe Job Procedures and Safe Work Practices.



Health, Safety, Environment and Employee Wellness are integral to everything we do at The Rafter D Corporation. We strive for safety excellence and we believe there is no compromise on safety. Getting the job done is important, getting it done safely is critical. In every decision we make, we consider the safety and the well-being of our employees, customers, and communities.

We continually look for opportunities to improve processes and practices. We have an established strategic direction for the company that is based on best practice industry standards.

### 2.3 The Rafter D Corporation's Philosophy Regarding Injury & Illness Prevention Program (IIPP)

- IIP & Safety takes precedence over shortcuts.
- Employee IPP & safety is an important consideration in the operations of The Rafter D Corporation.
- Accident prevention and efficient production go hand in hand.
- Injuries and property loss are both preventable and unnecessary.
- Every employee is entitled to a safe and healthy workplace.
- Safety is everybody's responsibility.

### 2.4 General Regulations

The Rafter D Corporation IIPP is intended to assist with understanding the requirements of OSHA. It does not supersede or replace the OSHA Regulation.

The Rafter D Corporation will promote a safe and healthy workplace and environment for all workers and will establish and maintain safe working practices through proper procedures and direction. Everyone on the worksite shares responsibility for safety. This includes management, supervisors and workers.

### 2.5 IIPP Roles and Responsibilities

The objective of The Rafter D Corporation is to provide appropriate services and quality workmanship without causing illness or injuries to any individuals or causing damage to property, equipment or the environment. To achieve this objective, The Rafter D Corporation has developed and will maintain an IIPP & HSE manual comprised of policies, rules, specific Safe Work Practices and Safe Job Procedures as described in greater detail within the IIPP Manual.

#### Definitions

- **Injury & Illness Prevention Program (IIPP) Administrator** – the person with the authority and responsibility for implementing the provisions of this program for The Rafter D Corporation.
- **Manager** – means a person who directs and controls an organization or part of the organization. For the purposes of this document, Manager may include but not limited to, the President, Construction Managers, General Managers, Division Managers, or Corporate Safety Managers.
- **Supervisor** – means a person who instructs, directs and controls employees in the performance of their duties. This may include, but not be limited to a Manager, Project Managers, Foreman, Sub - Foreman, Lead hand or a person in-charge as designated by a Manager, Supervisor, or Lead hand.
- **Worker** – means anyone that is not a supervisor or manager.
- **Employee** – includes a worker, supervisor, and manager.
- **Public** – Any person not in the employ of The Rafter D Corporation or any of its contractors or clients.

### 2.6 Responsibility of The Rafter D Corporation Management

It shall be the responsibility of Management to establish and maintain proper standards, policies, practices and procedures. Management is also responsible for the maintenance of buildings and equipment to provide a safe





working environment. Management will ensure that their supervisors are instructed and trained in safe working practices.

It is the responsibility of The Rafter D Corporation Management to ensure that:

- a) The IIPP is coordinated and consistent across all locations and worksites.
- b) A proactive approach to HSE & IIP requirements is used,
- c) All HSE & IIP Procedures and all pertinent laws, statues, codes and regulations are followed.
- d) All workers on all worksites comply with state OSHA Regulations and codes.
- e) A copy of the OSHA regulations is kept at all worksites and will be made accessible to all workers.
- f) A copy of the IIPP is kept at all worksites.
- g) The HSE & IIP policies will be posted in a common area.
- h) Clear direction is provided to all supervisors, employees and subcontractors to ensure their HSE & IIP responsibilities are understood and that they shall be held accountable for meeting these responsibilities.
- i) Ensure that Supervisors instruct all workers in the safe performance of their work and job tasks.
- j) All work is performed in a safe manner;
- k) Potential hazards are identified and communicated and eliminated; where this is not possible, instruct workers in how to minimize the hazard through safe work procedures.
- l) Prompt and appropriate action is taken to correct unsafe acts or conditions;
- m) Informal and planned safety inspections are conducted and, if required, appropriate and timely actions are taken to correct situations or to complete recommendations;
- n) Incident and near miss investigations, as required, are conducted and follow-up action taken without delay;
- o) Regular management meetings include the review of HSE & IIP activities: including incident trends, and establish necessary courses of action;
- p) All employees receive orientation and training in HSE & IIP policy and procedures in their assigned tasks.
- q) Maintain proper records of training, inspections, accidents and investigations.
- r) HSE statistics are tracked and communicated and appropriate records are kept;
- s) Follow-up instruction and training is conducted to confirm employees understand and continue to follow HSE & IIP policy and procedures;
- t) First aid services are provided in compliance with OSHA regulations.
- u) Report all work injuries and disease to the appropriate State Workers' Compensation Insurance carriers within the guideline of OSHA and jurisdictional requirements.
- v) Immediately report serious injuries, situations or deaths (see Accident Investigation and Reporting Section).
- w) Where applicable, Prime Contractor roles and responsibilities are understood and followed.
- x) Conduct an annual review of the HSE and IIP Program.
- y) A good example is set, and a safe work environment is consistently present.

### 2.7 General Health & Safety Program Requirements

- a) Written safe work procedures will be prepared for operations and worksites.
- b) Written hazard assessments will also be prepared when required by OSHA regulations.



- c) The Rafter D Corporation will specifically comply with all the reporting and record keeping requirements specified in this manual. This applies in particular to records of inspections, accident investigations, worker training and first aid and injury reporting.

## 2.8 Specific Responsibilities & Compliance

### Compliance – General Statement

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Supervisors and lead personnel are expected to enforce the rules fairly and uniformly.

All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.

The following is our system of ensuring that all workers comply with the rules and maintain a safe work environment:

- Informing workers of the provisions of our IIPP;
- Evaluating the safety performance of all workers;
- Recognizing employees who perform safe work practices. This recognition is accomplished by:
  - Providing training to workers whose safety performance is deficient;
  - Disciplining workers for failure to comply with safe and work practices. See section 3 – Company Rules & Enforcement

### Injury & Illness Prevention Program (IIPP) Administrator

Has the Authority and responsibility for implementing the provisions of this program for The Rafter D Corporation. All managers, supervisors and lead personnel are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the Program. A copy of this IIPP is available in the main office and on all worksites in the foreman binder.

### Senior Management

Unless clarified with a specific title the term "senior management" refers to the President.

It is the responsibility of senior management to establish and maintain the proper safety standards, policies and work procedures. This must include the maintenance of buildings and equipment. Senior management will provide a safe working environment for all workers and worksite visitors. It is also senior management's responsibility to ensure that managers are properly prepared to manage their safety and health responsibilities. The type and level of activity on a large worksite will change frequently. Senior managers will ensure that safe and healthy work practices are monitored and modified to safeguard workers. Specifically, senior management will:

- Ensure that accident prevention policies and procedures are established in consultation with all levels of management and workers.
- Hold the various levels of management/supervisors responsible and accountable for all aspects of the IIPP.
- Ensure that the HSE manual is communicated to all levels of management, supervisors, workers and subcontractors.
- Establish the mechanism to provide safety education programs for all workers.
- Review the performance of the IIPP.
- Authorize the necessary resources for the IIPP.
- Ensure that the IIPP is maintained.

### Line Management



Unless clarified with a specific title, the term "Line management" includes divisional and department managers.

Line Management will:

- Provide a safe and healthy worksite.
- Enforce the requirements of The Rafter D Corporation Health and Safety program and State OSHA Regulations.
- Provide workers with the appropriate personal protective equipment when required.
- Ensure that a joint health and safety committee or alternative is established and maintained, in accordance with OSHA Regulations or as directed by an OSHA officer.
- Ensure that all members of the Health & Safety Committee receive appropriate training to prepare them for their committee work.
- Consult and cooperate with the HSE committee, OSHA and its' officers
- Ensure accidents are promptly investigated and prompt correction of the hazard is undertaken.
- Ensure that appropriate records and statistics are maintained and made available to the joint health and safety committee, OSHA and/or OSHA Officers.
- Ensure that management meetings are held monthly or more frequently for the purpose of reviewing health and safety practices and accident trends to determine necessary courses of corrective action.
- Ensure that supervisory personnel have taken suitable supervisor training in health and safety.

### Supervisors

It is the responsibility of Supervisors to supervise workers in the safe performance of their duties. The instruction of workers is only the first step. It is equally important that Supervisors check to ensure that the instructions are understood and followed.

Supervisors will:

- Ensure that all work activity is done in compliance with OSHA Regulations.
- Supervisors are required to conduct "toolbox" or "tailgate" safety meetings with their crews at prior to start of work activities. Supervisors will hold safety meetings weekly.
- Ensure that workers are made aware of all known or reasonably foreseeable health or safety hazards in the areas where they work.
- Ensure all employees for whom they are responsible have received adequate orientation, instruction and training in the safe performance of their work and that these employees demonstrate that they can conduct their assigned tasks in a safe manner; or work under direct supervision of someone who is competent.
- Ensure that all employees are equipped and properly use all personal protective equipment assigned to them or to the job;
- Ensure their workers are instructed and trained in safe working practices.
- Ensure that all HSE & IIP related policies and procedures are followed
- Immediately correct unsafe acts or conditions
- Be familiar OSHA Regulations and ensure that all pertinent sections of any relevant statutes, codes, regulations and other laws or applicable guidelines are followed;
- Act on reports of any real or potential safety or health hazards identified by their workers and ensure that prompt action is taken on identifiable unsafe conditions, work practices and reported hazards;



- Ensure that only authorized and trained employees operate machinery and equipment;
- Employees are aware of their right to refuse unsafe work, their right know about the hazards in their workplace, the right to participate in health and safety programming (through their Joint Health and Safety Committee) and their right to protection from reprisal.
- Regular planned and informal workplace inspections are performed, and immediate action is taken to correct any unsafe conditions
- Participate in all accident and near miss investigations within their area of responsibility and ensure follow-up action is taken;
- Consult and cooperate with the health and safety committee during accident investigations.
- Be familiar with first aid reporting requirements and complete and submit lost-time injury reports.
- Complete worksite safety inspections and cooperate/consult with the Joint HSE committee during formal inspections.
- Be knowledgeable about the relevant OSHA Regulations as they apply to their worksite.
- Supervisors must address hazard assessment reports completed by the Joint Health and Safety Committee.
- Where applicable, Prime Contractor roles and responsibilities are followed, and
- Set a good safety example to our employees, clients and others in the industry.

### Employee Responsibility (Workers)

It is the responsibility of every worker to observe State OSHA regulations, to carry out all work safely and to report any real or potential safety or health hazard to the first available supervisor or safety committee member. Every employee has responsibility for their personal safety and the safety of others on the worksite and will be responsible to:

Workers will:

- Perform their work in a safe manner and follow the IIPP & HSE Manuals, rules, policies, procedures, and comply with any relevant statutes, codes and regulations;
- Read, understand, and comply with the IIPP including safety policy, safe work practices, procedures and rules.
- Take every reasonable precaution to protect the safety of themselves and other workers.
- Notify his/her supervisor of any unsafe conditions or acts.
- Report all accidents, injuries or “near misses”, regardless of their nature, to his/her supervisor as soon as possible.
- Use safety equipment; wear personal protective devices and clothing required by OSHA Regulations and this IIPP.
- Properly use and maintain the personal protective equipment provided as and when required for the job;
- Use only machinery and equipment that they are trained and authorized to operate;
- Not to remove guards from machinery or equipment except when trained to do so.
- Correct or immediately report any unsafe conditions or work practices to their immediate supervisor;
- Work safely and encourage co-workers to do the same;
- Be aware of potential hazards from adjoining work areas;
- Not engage in horseplay or similar conduct that will endanger the worker or any other person.



- Not work while impaired by alcohol, drugs (illicit or prescribed), or other means;
- Report to their Supervisor any physical or mental condition of themselves or others that may put them or any other employee at risk of injury; and
- Report any injury to their Supervisor and First Aid Attendant (if applicable to job site) immediately or as soon as practicable;
- Maintain a clean work area
- Make suggestions to their Joint Health and Safety Committee or Worker Health and Safety Representative, to improve health and safety conditions in the workplace;
- Cooperate with the Health & Safety Committee, the State OSHA Officers.
- Set a good example.

### First Aid Attendant Responsibilities

Primarily, the First Aid Attendant's responsibility is to provide first aid to anyone who requires it, including all employees, visitors and public. Additional responsibilities may include:

- Ensuring that adequate first aid equipment is available, first aid room is neat (if applicable to that job site), clean, and properly stocked and meets OSHA requirements;
- Provide general instruction and orientation to new workers;
- Report any hazards to the site supervisor;
- Check with workers as to who holds a valid first aid certificate;
- Maintain their own first aid qualifications as required;
- Assist the corporate or site safety officer when necessary; and
- Set a good example.

### Safety Manager

All HSE occurrences must be reported back to the site superintendent. The safety manager / advisor, or if no safety advisor is present the designated site supervisor, has multiple responsibilities that may include but are not limited to:

- 1) Engage site personnel so that a positive safety culture is created and maintained. Conduct and document orientations for all new workers, visitors, and others who come onto the site;
- 2) Ensure all aspects of the IIPP & HSE manual have been implemented as required;
- 3) Post (and communicate) all company safety bulletins, OSHA inspection reports, safety rules and requirements, company inspections and safety meeting minutes;
- 4) Record the name and contact information of each safety representative for each sub trade working on site.
- 5) Report all hazardous situations and hazards and risks to the project superintendent and if possible, eliminate the hazard immediately;
- 6) Record and report to management OSHA and company regulation infractions including any fines on appropriate forms;
- 7) Record HSE & IIPP infractions by visitors, delivery people or inspectors and report them to the site superintendent;
- 8) Assist contractors to conduct frequent risk assessments and collect appropriate documentation.



- 9) Arrange site safety meetings at least monthly (or as required) and maintain a sign in sheet.
- 10) Update and maintain current Safety Data Sheets for all hazardous substances onsite;
- 11) Ensure sub-trades are abiding by the site rules, regulations, policies and procedures;
- 12) Ensure sub-trades are completing daily toolbox meetings and are reviewing and revising them appropriately as the job progresses;
- 13) Assist the site supervisors in incident investigation, analysis and preparation of accident reports and summaries; and
- 14) Provide the necessary HSE & IIPP advice and guidance to personnel
- 15) Ensure IIP and HSE manual are implemented.
- 16) Ensure projects have the appropriate IIP process implemented and documentation completed and maintained.
- 17) Keep training records up to date.
- 18) Conduct regular site inspections.
- 19) Ensure all monthly safety inspections have been completed.

### **Environmental Specialist Responsibilities**

The Environmental Specialist is an extension of the superintendent's authority with respect to environment but cannot supersede it. All HSE & IIPP occurrences must be reported back to the site superintendent. The Environmental Specialist, or if no Environmental Specialist is present, the designated site supervisor has multiple responsibilities that may include but are not limited to:

- 1) Conduct and document orientations for all new workers, visitors, and others who come onto the site;
- 2) Ensure all aspects of the HSE & IIPP programs have been implemented as required;
- 3) Post (and communicate) all company environment bulletins, environmental inspection reports, environmental rules and requirements, company inspections and environment meeting minutes;
- 4) Report all environmentally hazardous situations and hazards and risks to the project superintendent and if possible, eliminate the hazard immediately;
- 5) Record and report to State Regional Emergency Operations Centre, State Emergency Program and company environmental spills or regulation infractions including any fines on appropriate forms;
- 6) Record HSE & IIPP infractions by visitors, delivery people or inspectors and report them to the site superintendent;
- 7) Assist contractors to conduct frequent environmental risk assessments and collect appropriate documentation;
- 8) Arrange environmental management meetings at least monthly (or as required) and maintain an action list for review and follow-up purposes;
- 9) Update and maintain current Safety Data Sheets for all hazardous substances onsite;
- 10) Update and maintain current environmental protection measures including but not limited erosion and sediment control measures;
- 11) Ensure sub-trades are abiding by the site rules, regulations, policies and procedures;
- 12) Ensure sub-trades are completing daily toolbox meetings and are reviewing and revising them appropriately as the job progresses;



- 13) Assist the site supervisors in incident investigation, analysis and preparation of environmental incident reports and summaries;
- 14) Provide the necessary HSE & IIPP advice and guidance to personnel; and
- 15) Ensure the HSE & IIPP programs are implemented.

### Health & Safety Committee or Safety Representative

The Rafter D Corporation as required will establish and maintain at every workplace a Joint Health & Safety Committee in compliance with the State OSHA regulations.

An HSE committee must be established when a worksite has over 20 employees. Smaller locations with less than 20 employees must have a safety representative. The Joint HSE committee will hold **monthly meetings as a minimum standard**.

It will be the responsibility of committee members to promote safe work practices and to assist in creating a safe place of work by recommending actions that will improve the effectiveness of the health and safety program.

All potential hazards will be immediately examined and corrected as needed, rather than waiting for the next committee meeting to report. The activities of the committee will, as a minimum, follow the requirements of the OSHA regulations. Full details on the roles and responsibilities of the health and safety committee are contained in **Section 9** of this manual.

### Fleet Owner's Responsibility

The fleet owner (including all management and supervisory personnel employed by the owner) is responsible for the identification and assignment of specific responsibilities to the operating crews. The owner must be aware of the requirements of every job and provide equipment and personnel capable of completing the job in a safe and efficient manner and in accordance with all applicable OSHA regulations.

The owner is specifically responsible for:

- Ensuring that the operator is well trained, experienced and competent to operate the specific piece of equipment to which he or she is assigned.
- Ensuring that a suitable and safe vehicle, equipment and a competent crew are assigned to the job. Providing qualified supervision for operations where needed.
- Ensuring that the operator fully understands any load charts for any cranes and is capable of determining the crane's net capacity for all permissible operating configurations.
- Ensuring that the operator is both capable of and aware of the necessity of carrying out all of his or her responsibilities.
- Ensuring that all personnel involved in maintaining, repairing, transporting, assembling and operating the equipment are well trained, experienced and competent to handle their specific jobs in a safe and efficient manner.
- To ensure a consistently high level of competence in all phases of the operations by providing ongoing, high-quality training and upgrading programs for all personnel.
- Assigning to the crews, definite individual responsibilities and the authority necessary to exercise the responsibilities.
- Ensuring that a thorough vehicle maintenance and inspection program is established and maintained. This will involve developing vehicle reports or records that facilitate the reporting of all work needed and completed on the vehicle.
- Ensuring that the client and site supervision are aware of their responsibilities and, in particular, what work must be done to prepare the site for the vehicle operation, particularly cranes and bucket trucks.



- Ensuring that the vehicle and associated equipment are in accordance with the manufacturer's requirements and all applicable regulations.

### Visitor Responsibility

All Worksite visitors will receive a safety orientation and where indicated, be accompanied, at all times, by someone who has been oriented in The Rafter D Corporation's IIPP.

All Visitors will comply with the HSE & IIP program, standards and OSHA Regulations. Wear the proper Personal Protective Equipment as required. Any injury on any The Rafter D Corporation worksite will be reported to the First Aid Attendant and The Rafter D management.

### Site Sub-Contractors Responsibility

Sub-contractors on worksites will comply with the IIPP and are also responsible for their own health and safety. Sub-contractors shall develop a written IIPP as required by OSHA Regulations.

While on site sub-contractors shall:

- Demonstrate that they are fully covered with Workers Compensation and liability insurance.
- Comply with all aspects of OSHA Regulation.
- Participate in the Safety Orientation provided to contractors.
- Work safely in a manner that will not pose an undue hazard to any person.
- Report any unsafe conditions or practices to the worksite H&S representative.
- Report all accidents and injuries.
- Comply with OSHA regulations as they pertain to controlled products.

## 2.9 Health & Safety Reporting

All health and safety related reports must be reviewed and signed by senior management. These reports will include the minutes of the committee meetings; injury reports; accident investigations and other items as may be required.

## 2.10 Posting of Information

The following items must be posted in a common worker area:

- All required State Posters as per to OSHA both in office common area and each work location where workers show up for work.
- Names and locations of the Health & Safety Committee members
- Minutes from the 3 most recent Health & Safety Committee meetings
- Current list of First-Aid Attendants
- Health and safety policy documents
- Emergency Response Plan

## 2.11 Worker's Right to Refuse Dangerous Work

Cal/OSHA law states "Workers have the right to call DOSH to file a complaint of any on safe condition in the workplace. DOSH must investigate the complaint as soon as possible, but not later than three days after receipt of a complaint charging serious violation (which indicates a substantial probability that death or serious physical harm could result). If a non-serious complaint is received, it must be investigated not later than 14 calendar days after the complaint is received."





In most, if not all jurisdictions in the United States, workers have the right to refuse dangerous work. Based on a review of all jurisdictions, The Rafter D Corporation has adopted the following standard:

### Procedure for refusal

- 1) A person must not carry out or cause to be carried out any work process or operate or, cause to be operated any tool, appliance or equipment if that person has reasonable cause to believe that to do so would create an undue hazard to the health and safety of any person.
- 2) A worker who refuses to carry out a work process or operate a tool, appliance or equipment pursuant to subsection (1) must immediately report the circumstances of the unsafe condition to his or her supervisor or employer.
- 3) A supervisor or manager receiving a report made under subsection (1) must immediately investigate the matter and;
  - a) Ensure that any unsafe condition is remedied without delay, or
  - b) If in his or her opinion the report is not valid, must so inform the person who made the report.
- 4) If the procedure under subsection (3) does not resolve the matter and the worker continues to refuse to carry out the work process or operate the tool, appliance or equipment, the supervisor or employer must investigate the matter in the presence of the worker who made the report and in the presence of;
  - a) A worker member of the HSE committee or H&S representative,
  - b) If there is no committee member or representative, any other reasonably available worker selected by the worker.
- 5) If the investigation under subsection (4) does not resolve the matter and the worker continues to refuse to carry out the work process or operate the tool, appliance or equipment, both the supervisor, or the manager, and the worker must immediately notify an H&S officer in the State in which they are working. The officer must investigate the matter without undue delay and issue whatever orders are deemed necessary.

### No discriminatory action

- 1) A worker must not be subject to discriminatory action because the worker has acted in compliance with this section or with an order made by an OSHA officer.
- 2) Temporary assignment to alternative work at no loss in pay to the worker until the matter in this section is resolved is deemed not to constitute discriminatory action.

In the event of a disagreement over whether or not the work is unsafe, an OSHA Officer will be asked to make a determination.

Any refusal to perform unsafe work must immediately be reported to management for investigation and action. All work refusal occurrences shall be documented for lessons learned and corrective measures to be put into place.

## 3.0 Safe Work Practices and Procedures

### 3.1 Safe Work Practice and Safe Job Procedure Policy

It is the policy of The Rafter D Corporation that all company workers are properly instructed in the safe performance of their duties. Safe work procedures will be enforced in the same manner as rules and regulations.

The company will determine which Safe Work Practices and Safe Job Procedures are needed, and whether they are being followed by reviewing inspection records and accident investigation records, observing jobs, and evaluating worker suggestions and safety committee recommendations.

Management in conjunction with the safety committee is responsible for the revision and development of safe work practices.



Supervisors are responsible for ensuring all workers understand and comply with general safe work practices and safe job procedures. Records of all training and site safety meetings shall be maintained at the work place and on completion of the project shall be submitted to the Divisional Manager. Records of training shall be maintained for five years

### 3.2 Safe Work Practices

Safe Work Practices are defined as “a set of positive guidelines or “Do’s and Don’ts” on how to perform a specific task or how to deal with a specific situation that may not always be done in a certain way”.

Safe Work Practices (SWPs) are typically universal practices i.e. they apply to all activities and to everyone within the organization.

The Rafter D Corporation strives to complete work efficiently, on time and safely. To help accomplish this, we have developed specific safe work practices for common work activities. In promoting safe work practices the company will do the following:

- Put our safe work practices in writing
- Make them available to all workers by keeping a copy at each work location
- Provide safe equipment and material to work with
- Give management support
- Require that supervisors enforce the use of and compliance with these safe work practices
- In compiling these safe work practices, the following reference material was consulted to ensure accuracy:
- The regulating authority having jurisdiction regarding safety legislation; State OSHA.
- Recognized safety procedures manuals
- Health hazard data books
- Supervisor and worker input and contributions

### 3.3 Safe Job Procedures

A Safe Job Procedure (SJP) is “a written, specific step-by-step description of how to complete a job safely and efficiently from start to finish”. Safe Job Procedures (SJPs) typically apply to a specific work location or work activity. They are not required for every job. The Rafter D Corporation has developed a comprehensive set of SJPs for all major work activities. Job procedures are a ready reference particularly to high-risk jobs, which are not done very often, jobs requiring uniformity, and jobs that are hazardous and need guidance.

To accomplish this task, our company has promoted worker safety by doing the following:

- Put our high-risk job procedures in writing and involve workers in the development of job procedures
- Make job procedures available to all workers performing the job
- Provided safe equipment, tools and material
- Required that supervisors enforce the use of and compliance with job procedures
- Provide management support

Job procedures developed by our company will comply with or exceed legislated requirements and manufacturer’s specifications. Job procedures will change from time to time due to new methods and products being introduced. An annual review will be done of selected job procedures and where indicated, changes will be made.



Where work is performed using client-specified procedures and/or subcontractor safe work procedures, these procedures shall be used unless the procedure specified is of a lower standard. Where this occurs, the higher standard will be used. However, in no case will work be carried out in contravention of State OSHA Regulations. Where a question arises, then the worksite copy of the OSHA Regulations shall be consulted for clarification.

**All Supervisors are required to be familiar with Safe Work Practices and Safe Job Procedures.**

## 4.0 Company Rules & Enforcement

### 4.1 Enforcement of HSE Rules

Compliance with the HSE manual, IIPP and all legislated safety standards are necessary to maintain a safe and healthy work environment. Corrective disciplinary measures are in effect to deal with non-compliance and all safety violations. The following are guidelines for disciplinary action pertaining to safety infractions resulting from non-compliance.

- **First Offence** – the worker will be given a verbal warning
- **Second Offence** – the worker will be given a written warning
- **Third Offence** – the worker's employment may be suspended, with or without pay
- **Fourth Offence** – termination

***The Rafter D Corporation reserves the right to terminate any employee for a single infraction, with or without prior notice.***

***For more details regarding The Rafter D Corporation's Progressive Enforcement and Discipline, see Standard 5.***

### 4.2 Safety Rules

Failure to follow the below safety rules will not be tolerated and an immediate investigation will take place upon the first occurrence of any such violations. Depending upon the outcome of the investigation disciplinary action up to and including termination of employment may result. Site inspection shall include inspection of compliance of workers on safety rules, policy and practices.

- Failure to provide supervision for workers,
- Failure to record and discuss proper job planning and write up safe work plans prior to starting each job daily,
- Being unfit for work due to the use or after effects of alcohol, illicit drugs, un-prescribed drugs for which a prescription is legally required or the intentional misuse of medications,
- Possession of/or being under the influence of illegal drugs or alcohol on the worksite
- Failure to rectify or notify a supervisor of a hazardous situation(s)
- Failure to communicate any safety related incidences to your supervisor immediately,
- Failure to use equipment properly (misuse, abuse, careless or negligent operations of Company equipment or facilities) including the use of motor vehicles,
- Performing work for which you are not trained and or qualified to undertake,
- Failure to maintain the limits of approach,
- Failure to properly follow and install protective grounds according to the approved grounding plan,
- Failure to properly set up stringing sites as they pertain to grounding and bonding the zone,
- Failure to install proper insulated cover up or install said cover up correctly,



- Failure to use fall arrest/fall protection and follow the fall arrest/protection plans,
- Wilfully or carelessly endangering the health and safety of any other worker,
- Violation of HSE procedures, OSHA legislation, regulations, acts or codes.
- Insubordination - refusal to comply with the IIPP and industry safety regulations
- Engaging in horseplay or serious and willful misconduct
- Failure or refusal to use personal protective equipment (PPE) when required
- Failure to replace handrails, barriers, covers or protective devices including safety signs
- Possession of firearms and/or other form of weapons on the worksite
- Fighting, vandalism, theft, or damage to property
- Any form of harassment or discrimination
- Ride a hook, hoist or other loads.
- Smoking near flammable products or plaque cards indicating danger or not in designated smoking areas.
- Any unsafe, dangerous, or reckless act.

### 4.3 General Safety Rules and Expectations

The safety expectations stated in this section of the Manual may not cover all the safety requirements employees will be expected to follow for each different situation - they are intended to remind employees of the more obvious conditions.

***If any employee has any concerns regarding the health or safety of a work process, they are encouraged and directed to consult with their immediate supervisor for additional instructions.***

- 1) The appropriate Personal Protective Equipment (PPE) and clothing must be worn to protect against the specific hazards and risks associated with the task. Refer to the SDS and Safe Work Practice on PPE for further information.
- 2) All hazardous conditions (work procedures, dangerous atmospheres, defective or malfunctioning tools, equipment, structures, protective clothing or equipment) must be immediately corrected or reported to your immediate supervisor.
- 3) All employees have the right to refuse unsafe work. If you have any concerns or questions regarding the safety of a work procedure, consult with your immediate supervisor before proceeding with the task. Appropriate steps will immediately be taken, and the situation immediately investigated to ensure the situation is corrected prior to continuing work. For further information, see the SWP on Employees' Safety Rights.
- 4) Equipment and machinery must be shut down and locked-out before oiling, adjusting, repairing or maintaining. Shut down equipment and machinery before fuelling. Proper lock-out procedures must be followed. Zero energy achieved.
- 5) Use the tools and equipment necessary to do your job safely, only use tools that have been designed for the task at hand and that you have proper training and experience to operate. If you do not know how to use or operate a tool or machine – DO NOT DO THE JOB! – Ask your immediate supervisor for training or instruction specific to that tool or machine. Take good care of tools and equipment – keeping equipment in good working order helps prevent incidents. Do not modify tools without manufactures approval.
- 6) Inform others if you are going to work above or below them and ensure that safe guards or precautions have been arranged. Never leave tools or equipment in an elevated position where they can be knocked off onto another person. All proper fall protection equipment must be used when working at elevations.



- 7) If a vehicle, machine or piece of equipment is equipped with seatbelts, then the driver and all passengers MUST use those seatbelts. The number of seatbelts will determine the number of passengers allowed.
- 8) All rigging, hoisting and work platform procedures must be performed safely in compliance with OSHA legislation and any other applicable Acts, Regulations or Codes. Appropriate slings, chokers, etc. must be used for all lifts. Only employees experienced and trained in rigging and hoisting must undertake these duties.
- 9) All injuries and incidents MUST be reported to your immediate supervisor AND first aid attendant at the earliest practicable opportunity. Emergencies that occur on "after-hours" jobs must be reported to the appropriate authorities (OSHA, police, ambulance, fire department, Workers' Compensation Insurance Carrier).
- 10) Employees under the influence of, or impaired by, drugs or alcohol will not be allowed to work and will be removed from the site (for further information see the SWP on Alcohol and Drugs)
- 11) Only authorized and qualified persons may operate company vehicles and powered mobile equipment. Appropriate driver's licenses or tickets are necessary.
- 12) Maintain good housekeeping on the work site to keep it free of hazards that could cause slips, trips, or falls.
- 13) Take notice of all safety guards, barriers, signs and tags and never render any safety device inoperable. Report any safety devices or guards that are not performing their intended function to your immediate supervisor. These devices are in place for your protection.
- 14) Use proper lifting techniques to avoid sprains, strains and back injuries. Get help or use lifting equipment for heavy or cumbersome loads. Guard against getting into an unbalanced position when pulling, prying or pushing - particularly at heights. ASK FOR HELP!
- 15) Sub-trades working on The Rafter D Corporation projects must follow any and all safety rules, procedures, practices and supplementary instructions set forth by the prime contractor.
- 16) For your own safety and that of your fellow employees, please take particular care when working in excavations, on scaffolds or other elevated platforms, and near power lines. These are the areas of our industry where the most serious accidents occur. When you are involved in these jobs take an extra moment to anticipate and minimize potential hazards to yourself and others and be familiar with the work procedures applicable to each task.
- 17) No horseplay, practical jokes or fighting of any kind will be tolerated and are immediate grounds for dismissal.
- 18) The use of I-Pods, MP3 Players, cell phones or other personal entertainment devices are not permitted on the job site. Employees are not permitted to use any sound-impairing devices while at work.
- 19) Smoking is only permitted outdoors, in designated smoking areas only.
- 20) Be safety smart – use the IIPP Manual as a living document. Your participation in our IIP & HSE manuals is expected and for your benefit.
- 21) Make suggestions to your supervisor on how we can improve safety on the job,
- 22) Work safely and encourage fellow workers to do the same,
- 23) Don't just attend safety meetings – participate in them as well.
- 24) If you have any questions or concerns regarding safety procedures or practices, talk to your foreman or the safety supervisor.
- 25) Personnel are not to work in any situations where an open edge could lead to a fall of 6 feet or greater. Safety rails or cables must be in place, guarding the edge, during work. If such safety barriers are not present, safety harnesses must be worn. An exception to this is if personnel are engaged in the initial connections of a skeleton structure and are competent in that work.



- 26) In the shop, keep work areas clean and aisles clear. Do not block emergency equipment or exits.
- 27) Gloves generally should be worn except where they would interfere with the safe operation or equipment or are not practical.
- 28) All workers should familiarize themselves with the location(s) of first aid equipment, fire extinguishers, PPE locations, and any other safety equipment.
- 29) Fire extinguishers must be located nearby all hot work activities.
- 30) Never use compressed air lines to blow dust or particles from your clothing.
- 31) Do not operate any equipment or machinery without the safety guards
- 32) If air tools are used, shut down the air supply, bleed the line prior to disconnecting the hoses.
- 33) Keep all air hoses and electric hoses clear of hot or molten steel.
- 34) Always tie off ladders to the top anchor point before using.
- 35) All portable ladders shall conform to ANSI Standards applicable to the State OSHA Regulations.

**Wear and use the prescribed Personal Protective Safety Equipment, "PPE". This includes, but is not limited to:**

- Hard hats must be worn on all job sites or Company property where there is a possibility of falling objects or other overhead dangers.
- ANSI approved safety boots with steel toes and shanks must be worn at all times.
- Hearing protection must be worn by all workers in noisy conditions.
- Safety glasses, cutting goggles, and/or face shields must be worn when there are hazards to the eyes.
- Reflective safety vests shall be used whenever workers are exposed to traffic or mobile equipment hazards.

Portable tools must be grounded using an approved three prong polarized plug and three wire cord with insulation intact.

All electrical tools must be in safe working condition and must be maintained in accordance to its manufacturer specifications.

Welding and cutting operations shall be carried out by authorized personnel only, and with the appropriate individual PPE.

Smoking on customer's work sites is permitted only in the designated "Smoking Areas".

Firearms, weapons, or explosives are not permitted on Company property.

Use, possession, sale or being under the influence of illegal drugs, misuse of prescription drugs and/or alcohol is not permitted on Company property or while "on duty".

#### **4.4 Environmental Expectations**

The environmental expectations stated in this section of the IIPP may not cover all the environmental requirements employees will be expected to follow for each different situation – they are intended to remind employees of the more obvious environmental conditions.

- 1) All personnel should be aware of the environmental risks associated with their work and are expected to be trained and prepared to respond in the event of an environmental incident;
- 2) All potential environmental hazards (leaks, spills, defective equipment and fuel containment, damaged erosion and sediment control measures, etc.) must be immediately corrected and reported to your supervisor;



- 3) Fuel and waste handling, transportation and storage must be conducted in accordance with all applicable OSHA Regulations, Codes and company policies;
- 4) Designated fuel storage areas must be at least 150 feet from any watercourse, whenever possible;
- 5) The implementation of erosion and sediment control (ESC) best management practices requires the participation of all field crew members: report all defective ESC measures, signs of erosion and the discharge of turbid waters from the site to your supervisor;
- 6) Take notice of any watercourses, guards, or environmentally protected areas and respect work free zones;
- 7) To minimize disturbance to vegetation and wildlife respect all work zone barriers, work schedules and applicable Acts, Regulations, Codes and company policies.
- 8) No deleterious substances (oil, fuel, lubricants, concrete wash, sediment exceeding allowable limits etc.) may enter any watercourse;
- 9) If an archeological artifact or object of historical interest is encountered STOP your work immediately and contact your supervisor; and
- 10) Sub-trades working on The Rafter D Corporation projects must follow any and all environmental rules, procedures, practices and supplementary instructions set forth by the prime contractor.

### Environmental Rules

Failure to follow the below environmental absolutes will not be tolerated and an immediate investigation will take place upon the first occurrence of any such violations. Depending upon the outcome of the investigation disciplinary action including termination of employment may result.

- Infraction of HSE procedures, legislation, OSHA regulations, acts or codes,
- Failure to obtain and meet the provisions of all notifications and permits,
- Failure to plan, design and implement proper environmental protection measures prior to the commencement of work,
- Failure to inspect and maintain equipment in good working order,
- Failure to report or address environmental hazards immediately,
- Failure to report a spill to your supervisor immediately, regardless of the magnitude,
- Dumping of refuse onsite, in a watercourse or water body, or at a non-registered disposal facility,
- Taunting, harassing, disrupting or destructing of wildlife or wildlife habitat,
- Introduction of deleterious substances in a watercourse, including dry ditches,
- Causing significant environmental damage that could have otherwise been avoided.

### 4.5 Use of Tobacco Products

The use of tobacco products, including the smoking of any tobacco product is not permitted in any company facilities. Smoking tobacco products is restricted to a safe outdoor location that is a minimum of 10 feet from a doorway, window, or air intake of an indoor workplace. For the purpose of this standard, a safe outdoor location is considered an area free of hazards such as vehicle traffic and flammable materials and must have free movement of air.

#### Smoking Restrictions

To minimize the risk of injury, fire and explosion, property and/or environmental damage, the following restrictions apply to all work areas and construction sites:

- Smoking is not permitted:



- In any company facilities including offices and trailers;
- Within 10 feet from a doorway, window, or air intake of an indoor workplace;
- While handling, or using flammable materials;
- In an underground working area if flammable gas is present;
- During high fire danger ratings;
- At fuel storage and dispensing sites:
  - Smoking and open flames are prohibited in areas used for fueling, fuel storage or enclosed storage of equipment containing fuel;
  - Signs, indicating that smoking is not permitted while the vehicle is being refuelled, must be visible;
- During blasting and the use of explosives:
  - Smoking is prohibited within 50 feet of where explosives are stored, being handled, or are in loaded holes;
- When disposing cigarettes, matches, and smoking materials:
  - Do not dispose of materials from moving vehicles, or anywhere on the ground;
  - Cigarettes must be completely extinguished;
  - Use waste receptacles provided at designated smoking areas;
  - Inspect receptacles regularly, and prior to leaving the site daily for signs of smouldering.

### 4.6 Fire Preparedness & Reporting

The Rafter D Corporation has adopted wild land Fire Prevention Plan into our procedures on all California Projects.

A Fire Plan is prepared for all projects pursuant to California Forest Practice Rules; Public Resource Code Division 4; Chapter 6. The training, equipment, and practices set for in this plan exceed the PRC rules and meet all CPUC requirements.

All employees are trained in our site Fire Management Plans and Emergency Response Plans. Emergency contact lists are posted and readily available to all project staff.

#### Consequences

Failure to follow requirements of the above reference plans could cause serious injury and /or illness. Disciplinary action, up to and including termination, may be used to assure rule enforcement. Please use common sense and think before you act. If you are not sure how to complete a job or task safely or have any questions, ask your supervisor.

### 4.7 Cell Phone Usage Policy

The Rafter D Corporation promotes a safe, healthy workplace for all workers and will establish and maintain safe working practices through proper procedures and direction. Everyone shares responsibility for safety. This includes management, supervisors, workers and contractors.

If you are in doubt about your safety role or responsibility, you must contact your supervisor for clarification prior to commencing or continuing your work activities.

#### General Rules:

- Employees must always ensure that they know the distracted driving laws in the areas that they are working, as details may vary from State to State.
- Employees may only talk on the phone while driving if using hands free devices.





- Focus attention on safe driving as this is the first priority. Always buckle up, keep your hands on the wheel and your eyes on the road.
- Employees may not use cell phones while working on the jobsite unless they have moved over to a hazard free area and have informed their supervisor.
- Employees are not to use their cell phones or other devices to access any social media while on the job site.

### Use of Cellular Phones and Hands-Free Systems:

- Employees shall not use hand-held cellular phones while driving.
- If, because of weather, traffic conditions, or any other reason, an employee is unable to concentrate fully on the road, they must either end the conversation or pull over and safely park the vehicle before resuming the call.
- Employees may use hands-free equipment to make or answer calls. However, safety must always be your first priority. Employees are expected to keep calls brief.
- If you need to place a call while operating the vehicle, use the voice command on the hands-free system to dial phone numbers.
- Ensure the phone is linked/synchronized to the hands-free system prior to operating the vehicle. Become knowledgeable about the operation of the hands-free system and practice using the hands-free device while your vehicle is stationary to ensure competence for operation while driving.
- If required to engage in a conversation while operating a motor vehicle, only the use of hands-free device is permitted. This will allow you to keep both hands on the wheel while using your phone. If you do not have a hands-free device, or it is not working properly, you are required to pull over at a safe location and stop the vehicle before taking the call. You are not permitted to resume driving until the conversation has ended and the phone has been hung up.
- The phone must be in a secure position in case a sudden stop is required.
- Never take notes while driving. Carefully pull off the road if you must take notes.
- Let voice mail pick up calls when it is unsafe to answer the phone.

## 5.0 Hygiene

The Rafter D Corporation may at times required at times medical surveillance (MS) assessments which may include Biological Monitoring (Chemical Contaminant Exposure), Asbestos, Lead, Silica, Benzene, Hearing Conservation (Audiometric/Hearing Testing) and Respirator (Breathing Apparatus) User. These surveillance programs shall be defined and assessed based on juridical / state requirements and hazards that maybe introduced to the workers. All records shall be kept confidential and remain with Human Resources.

### 5.1 Respirator Use

Dusts, chemicals, or reduced oxygen in the air create health hazards for workers. The Rafter D will eliminate these hazards if possible. If this is not possible or practicable, The Rafter D will minimize the hazards through engineering controls.

Engineering controls include: providing local exhaust ventilation, adding clean air to oxygen-deficient spaces, enclosing the process that is producing the airborne contaminant.

If engineering controls are not sufficient or practicable, The Rafter D will use administrative controls to reduce exposure to airborne hazards.

Administrative controls include: implementing safe-work procedures, scheduling job rotation, and training.



Only where airborne hazards cannot be eliminated or sufficiently reduced with engineering or administrative controls may personal protective equipment be used.

The worker shall be fit tested and trained in the selection, use, care and maintenance of the respiratory protection. If the worker is required to utilize a respirator, the worker shall be clean shaven to engage proper seal, complete medical assessment and if required may require medical clearance to don and use a respirator. Any changes to the workers medical condition or any other condition that may affect the effectiveness of the respirator shall complete the medical assessment and fit test, or annually as required.

### 5.2 Fit for Duty

All workers must report for work fit for duty. Where required The Rafter D Corporation or its client may require fitness for work exams; periodic, post Injury/Illness Absence or Pre-Placement.

The Rafter D Corporation may at times required at times medical surveillance (MS) assessments which may include Biological Monitoring (Chemical Contaminant Exposure), Asbestos, Lead, Silica, Benzene, Hearing Conservation (Audiometric/Hearing Testing) and Respirator (Breathing Apparatus) User. These surveillance programs shall be defined and assessed based on juridical requirements and hazards that maybe introduced to the workers.

Post incident medical exam and/ or physical evaluation post-injury before the worker returns to work maybe required, supervisors shall work with the HR group when the supervisor may have a concern with the fit for duty.

### 5.3 Drugs and Alcohol in the Workplace

The alcohol and drug practice is established

- to provide a safe workplace for all employees and those whose safety may be affected by the conduct of employees, and
- to ensure that all employees are treated fairly and with respect.

#### Drug and Alcohol Practice

The Rafter D Corporation recognizes its legal and moral responsibilities to provide a safe and productive work environment for all employees. The Rafter D Corporation recognizes that the state of your health affects job performance and the quality of work performed. Drug and alcohol abuse adversely affect your health and will inevitably result in problems at work.

The use of alcohol and drugs adversely affects the ability of a person to work in a safe manner. Employees at Power Line workplaces are often working independently or with equipment or material in an environment that poses a threat to the safety of themselves, the workforce, the workplace and the property at the workplace, if handled without proper care and attention. In setting the requirements in the Work Rule it is acknowledged that assessments of risks relating to work activities, equipment and processes may lead to a workplace adopting more rigorous requirements in relation to the risks faced in particular work. This Policy will remind employees of the risks associated with the use of alcohol and other drugs and provide understandable and predictable responses when an employee's conduct jeopardizes the safety of the workplace.

By pursuing the purposes of this alcohol and drug practice, the company promotes

- the safety and dignity of its employees,
- the welfare of its employees and their families,
- the best interests of the bargaining agent or labour provider to which employees belong, and
- the best interests of the company, the owner, the Power Line industry and the public.



There are no other reasonable alternatives available to the company that impose a smaller burden on any rights an employee may have under the Human Rights Act and at the same time are equally as effective in promoting the purposes of this alcohol and drug policy.

### **Alcohol and Drug Work Rule**

An employee shall not:

- use, possess or offer for sale alcohol and drugs or any product or device that may be used to attempt to tamper with any sample for a drug and alcohol test while on company property or at a company workplace.
- report to work or work with an alcohol level equal to or in excess of 0.040 grams per 210 litres of breath, or with a drug level for the drugs set out below equal to or in excess of the concentrations set out below, while unfit for work on account of the use of a prescription or non-prescription drug, refuse to comply with a request made by a representative of the company.
- Refuse to comply with a request to submit to an alcohol and drug test, provide a sample for an alcohol and drug test, tamper with a sample for an alcohol and drug test given. An employee complies with:
- The alcohol and drug work rule if he or she is in possession while at a company workplace of a prescription drug prescribed for him or her or a non-prescription drug,
- and the employee is using the prescription or non-prescription drug for its intended purpose and in the manner directed by the employee's physician or pharmacist or the manufacturer of the drug,
- and the use of the prescription or non-prescription drug does not adversely affect the employee's ability to safely perform his or her duties,
- and the employee has notified his or her supervisor or manager before starting work of any potentially unsafe side effects associated with the use of the prescription or non-prescription drug.
- The supervisor or manager who has received a notification may not disclose any information provided to any person other than a person who needs to know, to discharge a statutory or common-law obligation.

### **Implementation of the Alcohol and Drug Work Rule**

#### ***Education***

The company is committed to informing employees of the existence of this alcohol and drug policy and to taking such other steps as are reasonable to inform its employees of the safety risks associated with the use of alcohol and drugs and the assistance available under the employee assistance services program.

The likelihood that an employee will comply with the alcohol and drug work rule is increased if he or she knows the safety risks associated with the use of alcohol and drugs and the assistance available under the employee assistance services program.

#### ***Self-help***

This policy encourages employees who believe that they may require the help provided by substance abuse experts (SAEs) and employee assistance services programs (EAPs) to voluntarily request that help. An employee requesting help will not be disciplined unless he or she:

- has failed to comply with the alcohol and drug work rule,
- has been requested to confirm compliance with the alcohol and drug work rule,
- has been requested to submit to an alcohol and drug test,
- has been involved in an incident.

An employee who believes that he or she may be unable to comply with the alcohol and drug work rule should seek help by:



- contacting a person responsible for the administration of the employee assistance services program,
- informing a family member or friend and asking for assistance in contacting a person responsible for the administration of the employee assistance services program, or
- informing a co-worker, a supervisor, or a representative of the company, the bargaining agent or labour provider to which the employee may belong of his or her wish to contact a person responsible for the administration of the employee assistance services program.
- In responding to an employee's request for help, a foreman, supervisor or manager must:
  - inform the employee of the assistance available under the employee assistance services program,
  - encourage the employee to utilize the employee assistance services program which may assist the employee, and
  - inform the employee that if he or she fails to utilize the employee assistance services program the company may insist that the employee submit to any or all of the following:
    - a medical assessment conducted by a physician,
    - alcohol and drug testing and/or an assessment conducted by a substance abuse expert, and that his or her failure to do so may result in the termination of his or her employment.

An employee who receives assistance from the employee assistance services program on account of his or her use of alcohol and drugs must comply with the terms and conditions of any program established to help the employee as a condition of his or her continued employment.

An employee who is at work and enrolled in the employee assistance services program must comply with the alcohol and drug work rule.

### **Possession of Alcohol and Drugs**

A representative of the company or the owner who has reasonable grounds to believe an employee may not be in compliance with the alcohol and drug work rule, must request that employee to confirm that he or she is in compliance with the alcohol and drug work rule, or the assistance of appropriate authorities to confirm that employee's compliance with the alcohol and drug work rule.

A representative of the company or the owner must provide to the employee the reason for the request:

### **Observation of Employee Conduct**

A properly trained supervisor or a manager of an employee must request an employee to submit to an alcohol and drug test if the supervisor or manager and the next level of management present at the company workplace, if any, have reasonable grounds to believe that an employee is or may be unable to work in a safe manner because of the use of alcohol and drugs.

A supervisor or manager of an employee must provide to the employee the reason for the request under:

### **Incidents and Near Misses**

A supervisor or manager of an employee may request an employee to submit to an alcohol and drug test if the supervisor or manager and the next level of management present at the company workplace, if any, have reasonable grounds to believe that an employee was involved in an incident or near miss.

A properly trained supervisor or manager of an employee may request an employee to submit to an alcohol and drug test if the employee is known to have been involved in any of the following:

- An incident resulting in a recordable injury as defined by OSHA
- Equipment, vehicle or property damage in excess of \$1000



- Any incident and the supervisor or manager has reasonable suspicion to believe the worker is under the influence of alcohol or drugs

A supervisor or manager of an employee must provide to the employee the reason for the request.

A supervisor or manager must make a request immediately following an incident or near miss unless it is not practicable or reasonable to do so until a later time.

A supervisor or a manager of an employee need not request the employee to submit to an alcohol and drug test if the supervisor or manager and the next level of management present at the company workplace, if any, conclude that there is objective evidence to believe that the use of alcohol and drugs did not contribute to the cause of the incident or near miss.

### **Site Access Testing**

When an owner directly or by contract requires site access testing, an employer may require alcohol and drug testing of any employee as a condition of access to the owner's property.

### **Alcohol and Drug Testing**

The company agrees to retain a laboratory, as defined in this policy, to conduct urine drug testing in accordance with those parts of the Workplace Drug and Alcohol Testing Programs in force as of the date of this publication, which relate to testing procedures in laboratories.

Additionally, the company agrees to have alcohol testing conducted by personnel in accordance with the above standards and procedures as they relate to alcohol testing.

The company agrees to retain a laboratory, as defined in this policy, to conduct oral fluid testing.

By continuing his or her employment with the company the employee accepts the terms of this alcohol and drug policy and authorizes the laboratory to provide the test results to the company or any person with legal authority to require the disclosure of the test results, below. Further, the employee authorizes the medical review officer to provide the test results to a substance abuse expert to whom the employee has been referred under the provisions of this policy.

### **Alcohol and Drug Testing Results**

Alcohol and drug test results can be negative, positive, tampered and invalid or inconclusive. A negative test result means the employee is in compliance, a tampered test result means non-compliance, and an invalid or inconclusive test result cannot be relied upon to determine compliance or non-compliance. All test results will be provided in a confidential written report from the medical review officer to the designated company representative.

A report from the medical review officer to the designated company representative that the employee's sample produced a negative test result means that the employee complied with the alcohol and drug work rule. The designated company representative must notify the employee of the negative test result and that no other steps under this alcohol and drug policy will be taken. It may be appropriate to pursue procedures under other policies or take other steps, including a medical assessment, in order to assist the employee to perform at a satisfactory level.

A confidential written report from the medical review officer to the designated company representative that the employee's sample produced a positive test result means that the employee failed the alcohol and drug work rule, unless the medical review officer has determined that there is a legitimate medical explanation for the positive test result whereby a fitness-for-work assessment should be conducted and there may have been a failure to comply.

A confidential written report from the medical review officer to the designated company representative that the employee's sample has been tampered with means that the employee failed to comply with the alcohol and drug work rule.

A confidential written report from the medical review officer to the designated company representative that the employee's sample is invalid or inconclusive means that the test cannot be relied upon for the purposes of this work rule.



Where a person is referred to testing required under the bargaining agent or labour provider of that person, a confidential written report from the medical review officer shall be issued to the designated representative of the bargaining agent or labour provider.

To preserve the confidentiality of test results, the designated company representative and any person to whom disclosure is permitted under this alcohol and drug policy must not disclose the test results to any person other than a person who needs to know the test results to discharge an obligation under this alcohol and drug policy.

### **Assistance of a Representative**

A representative of a bargaining agent or labour provider of which an employee is a member and with whom the employer has a bargaining relationship may assist the employee with any matter arising under this alcohol and drug policy if the employee wishes to have the assistance of a representative.

A representative of a bargaining agent or labour provider of which an employee is a member and with whom the employer has a bargaining relationship, may attend any meeting or discussion which takes place under this alcohol and drug policy if the employee wishes the representative to attend and the attendance of the representative does not unduly delay the time at which the meeting or discussion takes place.

### **Consequences for Failure to Comply With the Alcohol and Drug Work Rule**

#### ***Company Responses to Violations***

The company may discipline, or terminate for cause, the employment of an employee who fails to comply with the alcohol and drug work rule. The appropriate consequence depends on the facts of the case, including the nature of violation, the existence of prior violations, the response to prior corrective programs and the seriousness of the violation.

Prior to the company making a final decision regarding disciplining or terminating the employment of an employee, who has failed to comply with of the alcohol and drug work rule, the company shall direct the employee to and the employee shall meet with a substance abuse expert. The substance abuse expert shall make an initial assessment of the employee and make appropriate recommendations.

The employee shall, through the substance abuse expert, provide to the company a confidential report of his or her initial assessment and recommendations. The company then shall make the final decision. The initial assessment is to be completed as soon as possible, and the report shall be delivered to the company within two days of completion. Failure by the employee to attend the assessment or follow the course of corrective or rehabilitation action shall be cause for termination of the employee. During the period of assessment and corrective rehabilitative programs recommended by the substance abuse expert the employee shall be deemed to be suspended from his or her employment without pay.

In addition to disciplining or terminating for cause the employment of an employee who fails to comply with the alcohol and drug work rule, the company may give written notice to that person that the person will not be re-employed again by the company unless the person provides the company with the following:

- a) a certificate issued
  - by the rehabilitation program service provider certifying that the person who was terminated has successfully completed its rehabilitation program and continues to comply with all the requirements of the rehabilitation program, or
  - by a licensed physician with knowledge of substance abuse disorders certifying that the person who was terminated is able to safely perform the duties he or she will be required to perform if employed by the company, and
- b) a statement signed by the person and, if represented by a bargaining agent or laborer provider, by the bargaining agent or labor provider acknowledging that the person agrees to any conditions imposed as part of a corrective rehabilitative program and such other reasonable conditions set by the employer. The employer may terminate the employment of the employee who fails to comply with the conditions set out in such statement.



### Violation of the Alcohol and Drug Work Rule

If a company decides to discipline or terminate for cause the employment of an employee who fails to comply with the alcohol and drug work rule, the company shall refer such employee to a substance abuse expert and shall notify the bargaining agent or labour provider, if the employee has one, of such referral.

### Owner Responses to Violations

The owner of a site where a person was working when he or she failed to comply with the alcohol and drug work rule may give the person who failed to comply with the alcohol and drug work rule written notice that he or she shall not enter the owner's site.

The owner of a site where a person was working when he or she failed to comply with the alcohol and drug work rule may give that person who has been denied permission to enter its site written notice that the person may enter the owner's site if:

- a company engaged in work at the owner's site, or
- the bargaining agent or labour provider of that person, if the person is represented by a bargaining agent or labour provider, or
- a company engaged in work at the owner's site and the bargaining agent or labour provider of that person provides the owner with a written statement by the person who has been denied permission to enter the owner's work site acknowledging that that person agrees to reasonable conditions imposed by the owner or the contractor or the bargaining agent or labour provider or a part of a corrective or rehabilitative program.

The owner may withdraw permission given if the person given permission to enter the owner's work site fails to comply with the alcohol and drug work rule or any condition imposed.

The owner is not obliged to give a person who has been denied permission to enter the owner's site another opportunity to work on the owner's site.

### Bargaining Agent or Labour Provider Responses to Violations

A bargaining agent or labour provider shall decline to dispatch a person to a company until that organization has reviewed the initial assessment, and until the conditions set out therein for the person have been met.

### Definitions

In this alcohol and drug policy, the following definitions apply:

- a) Alcohol: Any substance that may be consumed and that has an alcoholic content in excess of 0.5 per cent by volume.
- b) Alcohol and drugs: Alcohol or drugs or both.
- c) Alcohol and drug test: A test administered in accordance with this alcohol and drug policy.
- d) Alcohol and drug work rule: The alcohol and drug work rule set out in this alcohol and drug policy.
- e) Company: A corporation, partnership, association, joint venture, trust or organizational group of persons whether incorporated or not.
- f) Company workplace: Includes all real or personal property, facilities, land, buildings, equipment, containers, vehicles, vessels, boats and aircraft whether owned, leased or used by the company and wherever it may be located.
- g) Drug paraphernalia: Includes any personal property which is associated with the use of any drug, substance, chemical or agent the possession of which is unlawful in United States.



- h) **Drugs:** Includes any drug, substance, chemical or agent the use or possession of which is unlawful in the United States or requires a personal prescription from a licensed treating physician, any non-prescription medication lawfully sold in the USA and drug paraphernalia.
- i) **Employee:** Any person engaged in work on a work site where this policy applies.
- j) **Employee assistance services program:** Services that are designed to help employees who are experiencing personal problems such as alcohol and drug abuse.
- k) **Employer:** A person who controls and directs the activities of an employee under an express or implied contract of employment.
- l) **Incident:** An occurrence, circumstance or condition that caused or had the potential to cause damage to person, property, reputation, security or the environment.
- m) **Laboratory:** A laboratory providing urine-based drug testing services or oral fluid-based drug testing services must be certified under the National Laboratory Certification Program. A laboratory providing oral fluid-based drug testing services must ensure that the oral fluid testing be performed in such a manner that: (1) acceptable forensic practices and quality systems are maintained; (2) specimen validity testing is deployed; (3) regular independent audits occur; and (4) proficiency test samples are included.
- n) **Manager:** Includes team leaders and other persons in authority.
- o) **Medical review officer (MRO):** A licensed physician with knowledge of substance abuse disorders and the ability to evaluate an employee's positive test results who is responsible for receiving and reviewing laboratory results generated by an employer's drug testing program and evaluating medical explanations for certain drug test results.
- p) **Negative test result:** A report from the medical review officer that the employee who provided a specimen for alcohol and drug testing did not have an alcohol and drug concentration level equal to or in excess of that set out in this policy.
- q) **Owner:** The person in legal possession of a site.
- r) **Positive test result:** A report from the medical review officer that the employee who provided a specimen for alcohol and drug testing did have an alcohol or drug concentration level equal to or in excess of that set out in this policy.
- s) **Reasonable grounds:** Includes information established by the direct observation of the employee's conduct or other indicators, such as the physical appearance of the employee, the smell associated with the use of alcohol or drugs on his or her person or in the vicinity of his or her person, his or her attendance record, circumstances surrounding an incident or near miss and the presence of alcohol, drugs or drug paraphernalia in the vicinity of the employee or the area where the employee worked.
- t) **Rehabilitation program:** A program tailored to the needs of an individual which may include education, counselling and residential care offered to assist a person to comply with the alcohol and drug work rule.
- u) **Substance abuse expert (SAE):** A licensed physician; a licensed or certified social worker; a licensed or certified psychologist; a licensed or certified employee assistance expert; or an alcohol and drug abuse counsellor. He or she has received training specific to the SAE roles and responsibilities, has knowledge of and clinical experience in the diagnosis and treatment of substance abuse-related disorders, and has an understanding of the safety implications of substance use and abuse.
- v) **Supervisor:** The person who directs the work of others and may, depending on the nature of the company's structure, include the foreman, general foreman, supervisor, superintendent and team leader.
- w) **Tamper:** To alter, meddle, interfere or change.
- x) **Work:** Includes training and any other breaks from work while at a company workplace.
- y) **Work site:** A place at which a person performs work for an owner or employer.





## 5.4 Work Place Bullying and Harassment Practice / Policy

The Rafter D Corporation is dedicated to ensuring that employees are able to complete their duties in a safe environment, without fear of bullying, harassment or violence. As such, The Rafter D Corporation will not tolerate and is dedicated to preventing any instance of bullying, harassment or violence in the workplace. All employees of The Rafter D Corporation share in the responsibility to ensure that our workplace is a safe and welcoming place to work. Employees are responsible for reporting any instances of bullying, harassment or violence, whether they were the target, or they were witness to the incident. In all cases, where a complaint of bullying, harassment or violence is made in good faith, the employee will not be disciplined or retaliated against in any way.

Our Workplace Bullying, Harassment and Violence Policy is not meant to stop free speech or to interfere with everyday interactions. However, what one person finds offensive, others may not. Usually, bullying or harassment can be distinguished from normal, mutually acceptable socializing. It is important to remember it is the perception of the receiver of the potentially offensive message be it spoken, a gesture, a picture or some other form of communication which may be deemed objectionable or unwelcome that determines whether something is acceptable or not.

### Definition of Workplace Bullying and Harassment

- **Bullying and Harassment:** Any inappropriate conduct or comment by an individual towards an employee that caused or has the potential to cause that employee to be humiliated or intimidated.

Bullying and harassing behaviours include but are not limited to:

- Verbal aggression or yelling
- Humiliating actions or practices
- Hazing
- Spreading malicious rumours
- Using derogatory names towards someone

Bullying and harassing behaviours do not include:

- Expressing differences of opinions
- Offering constructive feedback, guidance, or work-related advice about behaviour
- Reasonable action taken by The Rafter D Corporation or a supervisor relating to management and direction of employees or the place of employment (e.g. counselling, managing a worker's performance, taking reasonable disciplinary actions, assigning work, implementation of disciplinary actions).

- **Cyber Bullying:** Bullying that occurs through the use of electronic communication (email, text messaging, social networking etc.). Incidents of cyber bullying should be reported and will be investigated in accordance to the procedures outlined within this Policy.

In general, if you are not sure whether certain actions are considered bullying, ask yourself whether a reasonable person would consider the actions taken to be acceptable or unacceptable.

- **Workplace Violence:** Violence means the attempted or actual exercise by a person, other than a worker, of any physical force so as to cause injury to a worker and includes any threatening statement or behaviour which gives a worker reasonable cause to believe that he or she is at risk of injury.

Violence could include, but is not limited to:

- Physical acts (e.g., hitting, shoving, pushing, kicking, sexual assault).



- Any threat, behaviour or action which is interpreted to carry the potential to harm or endanger the safety of others, result in an act of aggression, or destroy or damage property.
- Disruptive behaviour that is not appropriate to the work environment (e.g., yelling, swearing).
- **Discrimination:** Discrimination occurs when someone is treated differently and/or poorly because of one of the following:
  - Race
  - Colour
  - Ancestry
  - Place of Origin
  - Political Belief
  - Religion
  - Family or Marital Status
  - Physical or Mental Disability
  - Sex
  - Sexual Orientation
  - Age
  - Conviction of a criminal or summary conviction offence that is unrelated to the employment or to the intended employment of that person.

### **Bullying and Harassment Policy**

At The Rafter D Corporation, we believe that employees have the right to work without fear of bullying, harassment or violence. These incidents can possibly cause some, or all, of the following detrimental effects:

- Increased absenteeism due to disturbed sleep patterns, or a fear of going to work;
- A lack of productivity due to reduced concentration, confidence or morale;
- An increase in turnover as employees no longer want to work in the same place as the person who is bullying or harassing them;
- An increased likelihood of illness or injury due to stress;
- Harmful eating (e.g. a loss of appetite, or overeating/bingeing);
- Psychological effects that turn into physical symptoms (e.g. psychosomatic stomach pains or headaches);
- Substance dependency issues (increased use of alcohol or drugs);
- Feelings of shock, anger, frustration, vulnerability, etc.;
- Panic or anxiety;
- Clinical depression (and possible suicidal thoughts).

### **Application of this Policy**

This policy applies to all individuals working for the organization including front line employees, temporary employees, contract service providers, contractors, all supervisory personnel, managers, officers or directors. The organization will not tolerate bullying, harassment or violence whether engaged in by fellow employees, managers, officers, directors, or contract service providers of the organization.



The Rafter D Corporation will not tolerate any form of bullying, harassment, discrimination or violence against job candidates and employees on any grounds mentioned above, whether during the hiring process or during employment. This commitment applies to such areas as training, performance, assessment, promotions, transfers, layoffs, remuneration, and all other employment practices and working conditions.

For the purposes of this policy, bullying, harassment and violence can occur:

- At the workplace;
- At employment-related social functions;
- In the course of work assignments outside the workplace;
- During work-related travel;
- Over the telephone, if the conversation is work-related; or
- Elsewhere, if the person is there as a result of work-related responsibilities or a work-related relationship.

### **Risk Assessment**

The Company will conduct a risk assessment of the work environment to identify any issues related to potential violence, bullying or harassment that may impact the operation and will institute measures to control any identified risks to employee safety. This information will be provided to the Joint Health & Safety Committee or Safety Representative.

The risk assessment may include the review of records and reports (i.e. security reports, employee incident reports, staff perception surveys, health and safety inspection reports, first aid records or other related records). Specific areas that may contribute to risk of violence, bullying or harassment may include: contact with public, exchange of money, receiving doors, working alone or at night etc. Research may also include a review of similar workplaces with respect to their history of violence.

To provide support to all of our employees, The Rafter D Corporation recognizes that domestic violence is a serious issue that our employees may face. Domestic violence that occurs outside of the workplace and beyond an employee's assigned work duties is not considered workplace violence; however, if domestic violence occurs within our workplace, we have a duty to respond. If we learn of an incident of domestic violence we are committed to assessing the risk that it may pose to our employees.

The Rafter D Corporation will communicate information relating to a person with a history of violence where:

- Workers may reasonably be expected to come into contact with the person in the performance of their job duties; and
- There is a potential risk of workplace violence as a result of interactions with the person with a history of violence.

The Company will only disclose personal information that is deemed reasonably necessary to protect the worker from physical harm.

### **Seeking Immediate Assistance**

The USA Criminal Code deals with matters such as violent acts threats and behaviours such as stalking. The police should be contacted immediately when an act of violence has occurred in the workplace or when someone in the workplace is threatened with violence. If an employee feels threatened by a co-worker, volunteer, contractor, student, vendor, visitor or client/ customer then an immediate call to "911" is required.

### **Responsibilities**

The Rafter D Corporation shall:

- Not engage in any form of bullying, harassment or violence;
- Develop and maintain policy statements on bullying, harassment and violence;



- Take steps to prevent and minimize bullying, harassment and violence;
- Develop, implement and maintain procedures for reporting incidents and complaints;
- Develop, implement and maintain procedures for investigating incidents of complaints;
- Ensure supervisors and employees are aware of steps to prevent bullying, harassment and violence in the workplace;
- Ensure employees and supervisors are properly trained in recognizing the potential for bullying, harassment and violence, how to respond to incidents, and procedures for reporting;
- Review this Policy and procedures annually.

Supervisors shall:

- Not engage in bullying, harassment or violence of any kind;
- Comply with the policies and procedures in place for The Rafter D Corporation regarding bullying, harassment and violence;
- Promote a respectful and safe working environment;
- Ensure employee adherence to the Workplace Bullying, Harassment and Violence Policy;
- Investigate complaints of bullying, harassment or violence promptly and impartially;
- Maintain a confidential file for complaints of harassment, bullying and violence, investigations completed, and actions taken;
- Report the incident to police where appropriate;
- Apply appropriate disciplinary action where appropriate.

Employees shall:

- Treat others with respect, and contribute to a respectful and safe work environment;
- Report all acts of bullying, harassment and violence to management;
- Ensure and comply with The Rafter D Corporation's policies and procedures regarding workplace bullying, harassment and violence.

### **Witnessing Bullying, Harassment or Violence**

It is the responsibility of all employees of The Rafter D Corporation to promote a workplace that is respectful and productive. Where employees do not speak up about the presence of bullying, harassment or violence they may become the next target and they are also condoning the actions.

Any employee who witnesses bullying, harassment or violence is directed to:

- 1) Offer the person support and inform them that you witnessed the incident.
- 2) Encourage the person to come forward and let them know that you will be a witness and will provide a statement in the event of an investigation.
- 3) In some cases, where the person decides to confront the individual informally, you may be asked to be a witness to the conversation (or as support).
- 4) Where the person does not wish to make a complaint, it is still important that management is aware of the bullying, harassment or violent act taking place in the workplace. Tell your manager or a member of Human Resources what you witnessed so that this type of behaviour can be eliminated at The Rafter D Corporation as soon as possible.



## Reporting Bullying, Harassment or Violence

### Informal Procedure

If you are being bullied, harassed or have been a victim of violence:

- Inform the person perpetuating the actions immediately that their actions are not acceptable to you as soon as they start to occur.
- Describe the specific actions that they took that caused you to feel uncomfortable. When confronted, in many instances, the person will stop. Sometimes a person is not aware that they are acting in an unacceptable manner. This may also prevent the act from escalating and possibly becoming dangerous.
- It is important to keep a record of dates and times where you have spoken to the person who has committed the act of bullying, harassment or violence and inform your manager/supervisor or Human Resources what occurred.

Where the actions continue, employees are directed to use the formal reporting process.

### Formal Procedure

Where bullying, harassment or violence has either continued to occur after a conversation with the individual or was extreme or dangerous in nature, employees are required to report it immediately.

### Process:

- Speak with your supervisor/manager or with Human Resources or another member of Management where your supervisor/manager is the cause of concern and report the incident.
- Write out a statement detailing the incidents including:
  - The names of the parties involved
  - Any witnesses to the incident(s)
  - The location, date, and time of the incident(s)
  - Details about the incident (behaviour and/or words used)
  - Any additional details that would help with an investigation
- A fact-finding investigation will be instigated.
- Where it is determined that the person has contravened the law, the appropriate authorities will be contacted.
- All complaints shall be taken seriously and investigated fairly.
- Employees that submit a report or complaint of bullying, harassment or violence shall not be subject to any form of reprisal or retaliation as a result of the complaint.

Employees should be aware that The Rafter D Corporation does not support any retaliatory actions where the complainant has not utilized any of the reporting mechanisms.

## Investigating Reports of Bullying, Harassment or Violence

Once a written complaint has been received, The Rafter D Corporation will complete a thorough investigation. The investigation will begin immediately after receiving the complaint. Bullying, harassment and violence will not be ignored. Silence can, and often is, interpreted as acceptance. The investigation will be conducted in a timely manner.

For the purposes of this section the following definitions apply:



**Complainant** – The person who has made a complaint about another individual who they believe has bullied, harassed or committed an act of violence against them.

**Respondent** – The person whom another individual has accused of committing an act of bullying, harassment or violence.

The investigation will include:

- Informing the respondent of the complaint.
- Interviewing the complainant, any person involved in the incident, and any identified witnesses.
- Interviewing any other person who may have knowledge of the incidents related to the complaint or any other similar incidents.

A copy of the complaint, detailing the complainant's allegations, will then be provided to the respondent(s).

- The respondent is invited to reply in writing to the complainant's allegations and the reply will be made known to the complainant before the case proceeds further.
- The Company will do its best to protect from unnecessary disclosure the details of the incident being investigated and the identities of the complaining party and that of the alleged respondent.
- During the investigation, the complainant and the respondent will be interviewed along with any possible witnesses. Statements from all parties involved will be taken and a decision will be made.
- Where it is determined that harassment has occurred, a written report of the remedial action will be given to the employees concerned.

All documents related to the formal investigation will be maintained in a sealed envelope within a locked cabinet. The documentation will be kept by The Rafter D Corporation for a period of no less than two (2) years\* after the respondent terminates their employment.

### **Fraudulent or Malicious Complaints**

This Workplace Bullying, Harassment and Violence Policy must never be used to bring fraudulent or malicious complaints against employees. It is important to realize that unfounded/frivolous allegations of bullying, harassment or violence may cause both the accused person and the Company significant damage. If it is determined by the company that any employee has knowingly made false statements regarding an allegation of bullying, harassment, or violence, immediate disciplinary action will be taken. As with any case of dishonesty, disciplinary action may include immediate dismissal without further notice.

### **Disciplinary Actions**

If the findings of the investigation indicate that a violation of the Workplace Bullying, Harassment and Violence Policy has occurred, immediate and appropriate disciplinary action, up to and including dismissal, shall be administered. Other corrective actions may include an employee transfer (where the complainant desires the transfer, it shall be provided to them but in all other cases, the respondent will be transferred). As well, The Rafter D Corporation will monitor the situation between the employees to ensure that the action does not reoccur. Corrective actions shall be proportional to the seriousness or repetitiveness of the offense.

### **Confidentiality**

The Rafter D Corporation will attempt, in all cases, to maintain the confidentiality of the complainant and respondent. While it is not always possible to do so when soliciting witness statements, The Rafter D Corporation will not release any information to other employees which would jeopardize the confidentiality of the parties involved. Where it is determined that legislation/law was contravened, The Rafter D Corporation will supply any and all evidence to the authorities as necessary.

### **Appeal Process**



If the complainant or respondent have worked with the process and feel that it has failed at some point, or that the corrective action is not consistent with the incident(s) that led to the original complaint, an appeal process is in place. The employee must complete a written complaint form and submit it to Senior Management. The form should include all the reasons why the employee did not feel that the process was equitable. Where necessary, further investigation will be instigated.

### Providing Support

The Rafter D Corporation is committed to the wellbeing of all our employees, as such where there has been an incident of bullying, harassment or violence we will ensure that the necessary support is provided to employees. Employees who are feeling adverse symptoms as a result of an incident are encouraged to speak with Human Resources or another member of management so that the necessary support can be provided.

## 6.0 Health & Safety Education and Training

### 6.1 Training Practice

The Rafter D Corporation recognizes and accepts the responsibility of providing adequate health and safety training to its workers. Each employee will be provided with training and periodic retraining to ensure awareness of safety procedures and potential hazards in the workplace.

Employees shall receive a general orientation to the workplace, on-the-job training and verification, and follow-up to ensure they understand and use the training provided. No new field employee will be asked to be in a leadership role or work alone and will be directly supervised, until deemed competent.

As an ongoing practice, safety training will be provided to supervisors, management, and existing workers. The Rafter D Corporation understands and will comply with its legal responsibility to ensure that every worker is adequately qualified, suitably trained and has sufficient experience to perform his or her work safely.

When these requirements are not practical, as in the case of a new worker, the work being performed will be done so under the direct supervision of a competent worker.

Records will be maintained for each worker, documenting the training or education received in order to perform his/her assigned tasks as well as the dates (and expiry) said training or educational programs are completed.

Each department supervisor shall be held accountable for the adequate training required by company and state safety standards.

### 6.2 Training & Instruction

All workers, including management, supervisors, and lead personnel shall have training and instruction on general and job-specific safety and health practices.

All electrical employees shall have a minimum of 10 hours of OSHA training. The Rafter D Corporation will insure that all electrical employees will have this renewed every 5 years. If required by a customer, workers will receive up to 30 hours of OSHA training, renewed every 5 years.

Training and instruction shall be provided as follows:

- When the IIPP is first established;
- To all new workers;
- To all workers given new job assignments for which training has not previously provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever we become aware of a new or previously unrecognized hazard;



- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- To all workers with respect to hazards specific to each employee's job assignment.
- This training will include (but is no limited to):
- Explanation of our IIPP, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Availability of toilet, hand-washing, and drinking water facilities
- Provisions for medical services and first aid, including emergency procedures.
- Proper housekeeping, such as keeping stairways and isles clear, work areas neat and orderly, and promptly cleaning up spills.
- Prohibiting horseplay, scuffling, or other acts that adversely influence safety.
- Proper storage to prevent:
  - stacking goods in an unstable manner
  - storing materials and good against doors, exits, fir extinguishing equipment and electrical panels.
- Where applicable our training may also include:
- Prevention of musculoskeletal disorders, including proper lifting techniques
- Use of appropriate clothing, including gloves, footwear, and personal protective equipment.
- Information about chemical hazards to which employees could be exposed and other hazard communication program information.
- Proper food and beverage storage to prevent them from becoming contaminated
- In addition, we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.

### 6.3 Worker Orientation

The Rafter D Corporation will ensure that all workers are oriented to the worksite before they begin work. General worksite rules, safe work procedures and job rules will be written and made available.

The orientation will include:

- Supervisors name and contact information.
- Rights and responsibilities of senior management, supervisors, workers, and visitors.
- An overview of the contents of this manual, including how to report an unsafe condition, the right to refuse dangerous work and other general safety and health rules.
- A walk through the worksite, noting hazards, dangerous areas, restricted areas and jobs where personal protective equipment is required.
- An introduction to fellow team members so the new worker is more likely to ask for assistance as needed and the team recognizes the new worker.

Specific instruction in:

- The proper use of personal protective equipment;
- The basics of the OSHA Hazard Communication Standard (HCS) program;





- How to recognize and report hazards properly;
- How to report personal injury properly;
- The safe work procedures for working alone or in isolation;
- Environmental training;
- Violence in the worksite;
- Location of all first aid stations.

The orientation of all workers will be documented, with the worker signing a new worker orientation form. This form will be kept as part of the records maintained by The Rafter D Corporation.

### 6.4 Visitor Orientation

A worker of The Rafter D Corporation will escort and ensure the safety for all visitors on the worksite. Where required, a work area safety orientation will be provided regarding access to first aid and emergency procedures.

### 6.5 Specialized Training

The Rafter D Corporation will provide additional training for workers involved in special tasks, including:

- Site specific safety requirements
- Lockout procedures - machinery and equipment
- Electrical Safety - electrical contact with overhead and underground power lines
- Emergency procedures for substances under pressure - Care and use of gas cylinders
- Fall Protection
- Confined Space
- Recognizing symptoms for heat disorder – production areas
- Safe operation of mobile equipment – Trucks, forklifts, mobile cranes, etc.
- Hazards of HCS controlled products including procedures for safe use, handling, storage and disposal of controlled products; workers are provided training on the chemical and/or biological hazards they may be exposed to during the course of their work.

Note: Project managers, health and safety supervisors, foreman and trade trainers are responsible for ensuring that all new or transferred employees are trained to conduct the assigned task safely. New employees will be assessed on their understanding and competency on new tasks assigned.

### 6.6 Follow-up on Training

Supervisors will observe workers throughout their area of responsibility to ensure safe work procedures are being used. Workers who require additional training or correction will receive it. The Rafter D Corporation will keep a record of the additional training.

- OSHA HCS training (reviewed annually)
- TDG training
- Mobile Equipment (e.g. forklift or scissor lift) (reviewed every two years)
- First Aid (reviewed and certified as required by OSHA regulations)
- Other specialized training will be reviewed in accordance with OSHA Regulations.



### 6.7 Communications

The following is our system of communication, designed to facilitate a continuous flow of two-way (management, supervision and employees) safety and health information in a form that is readily understandable to and between all affected site personnel:

- New worker orientation, including a discussion of site-specific safety and health policies and procedures
- Follow-through by supervision to ensure effectiveness.
- Workplace-specific safety and health training.
- Safety meetings held at least every month - more frequently as deemed necessary by the creation of hazards or occurrence of injuries and illnesses.
- Effective written communication of safety and health concerns between workers and supervisors, including language translation where appropriate.
- Posted and distributed safety information.
- A system for workers to anonymously inform management about workplace hazards without fear of reprisal.
- This is accommodated by other means we use to ensure communication with employees include:
  - The Rafters D Corporation elects to use a labor/management safety and health committee meeting all the requirements of T8CCR 3203 (7) (c) (1) - (7) to comply with the communication requirements of subsection (a)(3) of T8CCR 3203.
  - Our organization has less than ten employees and complies with the requirements of subsection (a)(3) of T8CCR 3203 by communicating and instructing employees orally in:
    - general safe work practices with specifics with respect to hazards unique to the employees' job assignment.

Involvement in the workforce in the management of IIPP & HSE activities is essential for improving IIPP & HSE performance. Effective consultation, communication and involvement of the workforce are also central to the successful implementation of the HSE management system. There are a number of mechanisms for workforce participation, communications and consultations, including:

- Use of safety notice boards
- Safety Committees
- Distribution of HSE Alerts either issued from internal sources or relevant industries
- Regular IIPP & HSE meetings
- Formal and informal communications via management, supervision, and IIPP & HSE representatives

## 7.0 Supplementary Programs

### 7.1 Asbestos Safety Program

Supervisors and Safety Supervisors are responsible for the control of the asbestos program. If any material is suspected of being asbestos within a The Rafters D Corporation facility or worksite, the Supervisor and Site Safety Supervisor should be immediately contacted. Samples will be taken and analyzed. If the material is asbestos, then a qualified contractor will be employed to remove and properly store the material.



## 7.2 Violence in the Workplace Practice / Policy

The management of The Rafter D Corporation recognizes the potential for workplace violence and other aggressive behavior directed at our employees. We will not tolerate behaviour from anyone that intimidates, threatens, harasses, abuses, injures or otherwise victimizes our employees and will take whatever steps are appropriate to protect our employees from potential hazards associated with workplace violence, as defined below. Likewise, The Rafter D Corporation will not tolerate an employee's behaviour that intimidates, threatens, harasses, abuses, injures or otherwise victimizes a co-worker or a member of the public.

The Rafter D Corporation is committed to providing our employees with an appropriate level of protection from the hazards associated with, and ensuring employees feel safe from, workplace violence. The Rafter D Corporation will use its best efforts to ensure, so far as is reasonably practicable, that no worker is subjected to violence in the workplace. The Rafter D Corporation will take corrective action respecting any person under the employer's direction who subjects a worker or any member of the public to workplace violence and will take reasonable steps to alert the authorities of such actions.

### Responsibilities

The Rafter D Corporation Management will:

- Inform employees if they are working in an area where there is a potential for violence and identify any risks that are specific to that area.
- Inform workers who may be exposed to the risk of violence of the nature and extent of the risk. This includes providing information related to the risk of violence from persons who have a history of violent behavior and whom workers are likely to encounter in the course of their work.
- Ensure that appropriate procedures are in place to minimize the risk to our employees from violence including the reporting of any incidents to the relevant authorities.
- Ensure that employees are trained in recognizing and responding to situations involving workplace violence.
- Ensure that every reported incident of workplace violence is investigated and potential areas for improvement are identified.
- Report to authorities of any anticipated or actual workplace violence.

Employees of The Rafter D Corporation are:

- Required to be familiar with and follow the procedures that are in place to protect them from workplace violence.
- All employees must participate in the instruction of workplace violence prevention.
- Employees are required to immediately report all incidents of workplace violence to their supervisor.
- Employees are also responsible for participating in work site hazard assessments and implementing controls and procedures to eliminate or control the associated hazards.
- Employees are required to report all known or potential incidents of workplace violence.
- Employees shall not encourage, incite or otherwise participate in any form of workplace violence.
- Employees must, when possible, remove themselves from the situation and immediately report it to their immediate Supervisor/Manager.

No employee can be penalized, reprimanded, or in any way criticized when acting in good faith while following the procedures for addressing situations involving workplace violence.

Employees may be disciplined if they act in a violent or otherwise confrontational manner when addressing or confronting a situation of workplace violence and such acts are not acts of self-defence of themselves or of others.

### Workplace Violence Defined



Workplace violence entails a broad scope of activities and is defined as the attempted or actual exercise by a person of any physical force so as to cause injury to a worker and includes any threatening statement or behavior which gives a worker reasonable cause to believe that he or she is at risk of injury. It is any act in which a person is abused, threatened, intimidated, battered or assaulted in his or her employment. Workplace violence includes, but is not limited to:

- **Verbal abuse** – condescending connotation in language, swearing or insults
- **Verbal or written threats** – any expression of an intent to inflict harm
- **Physical attacks** – kicking, shoving, pushing, hitting or striking in any manner
- **Threatening behavior** – destroying property, throwing objects or shaking fists.
- **Harassment** – any behavior that demeans, embarrasses, humiliates, annoys, alarms or verbally abuses a person and that is known or would be expected to be unwelcome. This includes words, gestures, intimidation, bullying, or other inappropriate activities.

Examples of workplace violence include but are not limited to, inciting rumors, pranks, escalated arguments, vandalism, sabotage, theft, physical assault, psychological trauma, anger-related incidents, rape, arson, and murder.

Workplace violence can not only occur in the traditional workplace such as the office and jobsites but also at work related functions such as conferences and social events related to work.

Additionally, The Rafter D Corporation believes that all our employees have the right to work in an environment free from all forms of harassment. Harassment is defined as any objectionable conduct, comment, or display by a person that:

- Is directed to any employee
- Is made on the basis of race, creed, religion, colour, sex, sexual orientation, marital status, disability, physical size or weight, age, nationality, ancestry, or place of origin.
- Constitutes a threat to the health and safety of the employee.

The Rafter D Corporation will utilize its best efforts to ensure that no employee is subjected to harassment at any of our places of employment. Our management is committed to keeping this policy and seeing that no employee causes or participates in the harassment of another employee.

### 7.3 Environmental Protection Practice / Policy

Protecting the United States' natural environment is a national concern. The Rafter D Corporation shares that concern and is committed to minimizing the impact of its activities on the environment while managing our operations economically and efficiently.

The Rafter D Corporation understands the potential hazards of worksite contaminants to workers, the public, and the environment. It is the policy of our company to show care in the safe handling, storage, and use of those products that may negatively affect people, or the surrounding land, air, or water.

The Rafter D Corporation will not knowingly expose workers or other persons to hazardous levels of worksite toxins and will take steps to ensure that hazardous products or by-products are contained and not introduced to the environment.

Where contaminants may be released or present a hazard to workers or the environment, our company will take steps to ensure the safety of persons through the use of protective equipment, engineering controls, and environmental monitoring. Where chemical overexposure to persons may occur, the company will ensure medical precautions are taken to reduce or eliminate any acute or chronic health effects.

#### Environmental Protection Principles



The environmental policy and procedures have been put in place for the protection of The Rafter D Corporation employees, our clients and the environment. Environmental practices and regulations will vary according to location and legislation, but generally good environmental practices are common to all locations.

**All The Rafter D Corporation workers will be guided by the following principles:**

- **Prevent** – We will plan our activities during stages of estimating and pre-construction to prevent or limit environmental damage.
- **Consult** – We will consult with all local, State or federal groups having jurisdiction in our work areas, to ensure that we comply with all legislated requirements and take prudent action to protect the environment.
- **Improve** – We will promote the use of practices that will meet or exceed all environmental standards and general good practice.
- **Monitor** – We through our site supervisors will monitor all work areas under our control and keep current with legislation to ensure that environmental protection measures are maintained at all times.
- **Correct** – We will take appropriate action to correct any environmental damage arising from our operations.
- **Respond** – We will respond immediately to any emergencies created by our actions to protect our workers, the public and the environment.
- **Train** – We will ensure that any environmental training programs required for our workers will be provided.

The items set out in this procedure will be considered the guiding principles for The Rafter D Corporation employees, subcontractor/trade contractors and suppliers working under The Rafter D Corporation jurisdiction on our worksites.

**Environmental Practices**

The Rafter D Corporation takes responsibility in upholding this commitment by requiring all employees to do the following:

- Complying with applicable environmental law, industry standards, and our own policies.
- Making environmental considerations an integral part of our planning process.
- Operating our vehicles and facilities in a manner that protects the environment.
- Identifying and mitigating the adverse impacts of our operations on the environment in keeping with good environmental and business practices.
- Remaining sensitive to the concerns of the public.
- Responding to environmental emergencies in a prompt and efficient manner.
- Committing sufficient resources to ensure that our employees are fully informed of their responsibilities and are trained to protect the environment while performing their duties.
- Abiding by and complying with customers and owners' environmental protection plans, or other environmental requirements specified for a particular job or project.
- Preparing environmental plans when required for specific jobs or projects and abiding by such environmental plans.

Management, employees, and contractors are all committed to abiding by the above objectives now and in the future. Specific procedures will vary depending upon the job or project as environmental issues vary from site to site, from State to State and from season to season.

To meet the legal requirements regarding prevention of personal over-exposure to hazardous products and contaminants in the workplace, according to OSHA Hazard Communication Standard:

- Spill containment and clean-up products and procedures are in place at worksites requiring them.



- Limit emissions from vehicles and equipment in enclosed spaces.
- Provide adequate ventilation where it is necessary to provide relief from hazardous airborne substances.
- Serious environmental contamination will be documented, and authorities advised where required.

Standard reporting practices for spills include:

- Oils and lubricants
- Fuels
- Glycol
- Corrosives, acids
- Solvents

### Environmental Containment Procedures

The following is an outline of preventative techniques and response that will enable The Rafter D Corporation employees to prevent, and if necessary, respond to, any harmful air, land, or water borne contamination of the environment.

#### **Contamination Type:**

- **Land:** the spillage of any liquid or solid that may negatively affect the soil, strata, flora and fauna, or persons in the short or long term.
- **Water:** the spillage of any liquid or solid that may negatively affect the ecosystem or portability of the immediate body of water or connected bodies of water in the short or long term.
- **Air:** the release of airborne substances (dust, vapours, gases, fumes, etc.) that may negatively affect the respiratory health of humans, flora, or fauna, in the short or long term.

#### **Risk Assessment:**

Prior to any project being undertaken, it is necessary to undertake a risk assessment to determine the potential for any of the above types of contamination. The following is an outline of the procedures to be used to prepare for potential workplace contaminants:

#### **Land and water:**

Where liquid products will be used (fuel, solvents, paint products, etc.), spill control and clean-up products (spill kits) should be available on site. These spill kits should consist of: absorbent booms (to contain spills), pads or pillows (enough to soak up the liquid quantity you have), shovel, disposal bags, and protective equipment (coveralls, chem. resistant gloves, goggles).

Where the risk exists for a waterborne spill, absorbent booms, pads, and pillows must be hydrophobic.

These products will also provide for the potential clean-up of solid contaminant.

#### **Airborne:**

Where the potential for airborne contaminants exists, ventilation should be the first consideration, as the dispersal of airborne product eliminates the need for personal protective equipment.

Where ventilation may prove difficult, it is necessary to provide protective respirators. Where there may be solid airborne contamination (dust, fume), disposable respirators suitable for filtering out the contaminants may be used (always follow manufacturer's recommendations regarding use and limitations).

Where heavy solid airborne contamination, or vapour, gas or mist may be present, it is necessary to provide dual cartridge type respirators with appropriate cartridges (with or without pre-filters depending on contaminant



concentration). Where there may be uncertainty as to the type of respirator suitable for a workplace, respirator manufacturers and distributors can provide this information.

### Spill Response

Where spills may have occurred, follow this procedure:

- Get away (if it may be a health hazard).
- Identify what you saw, and what was released.
- Prevent or inhibit the further release of product (if it is safe to do so).
- Get help, and alert others. Seal off the area.
- Look for and assist any injured or overcome persons.
- Identify the hazards and plan your actions (proceed with local clean up if it is safe to do so, otherwise, call 911).
- Get proper equipment, PPE, and materials to deal with the spill.
- Contain the spill (from traveling to drains, waterways, or away from the immediate release location to limit further contamination).
- Clean up the spill. Notify proper agencies when and where it is necessary to do so.

### 7.4 Young/New Workers and Short Service Employees

It is recognized that young workers suffer a higher than average worksite injury frequency. The combination of incumbent hazards from various work-related activities and the relative inexperience and occasional indifference to safety of young workers increases the risk factors associated with injury to this age group in industry. It is also common practice that some sub-contractors, including parents who employ their children, provide little guidance, supervision, or safety awareness to young workers.

Given these factors, The Rafter D Corporation has adopted the following practices to ensure the safety of young workers that we may employ. All new workers to a workplace must receive a formal worksite orientation and sign-off prior to starting work.

Subcontractors must manage their Short Service Employees in accordance with the requirements of The Rafter D Corporation Short Service Employee program.

#### Definitions

**"New Worker"** or **"Short Service Employee"** means any worker who is

- new to the workplace,
- has less than 6 months experience with his/her present employer, or in his/her present role
- returning to a workplace where the hazards in that workplace have changed during the worker's absence,
- affected by a change in the hazards of a workplace, or
- relocated to a new workplace if the hazards in that workplace are different from the hazards in the worker's previous workplace;

**"Young worker"** means any worker who is under 25 years of age

#### Work Restrictions

- A Short Service or New Employee may not work alone.
- A Short Service or New Employee can't operate any equipment without supervision, training and certification.



- Prior to starting work, The Rafter D Corporation will notify the Prime Contractor (project coordinator, contractor contact, and/or on-site supervisor) if Short Service Employees or Young Workers are present on work crews.
- Short Service or New Employees shall be visibly identified through the use of a different colored hardhat or other method of identification. The method used to identify SSEs will be communicated to the Prime Contractor.
- Short Service or New Employees shall be monitored for compliance with health, safety, and environmental policies and procedures. Once the Short Service or New Employee has demonstrated competency and compliance with HSE policies and procedures, the contractor may remove the hi-visibility identifier.

### Orientation

The orientation must include:

- All items listed under Worker Orientation under section 2.2 of this manual.
- All workers will receive an IIP & HSE Employee Handbook.
- All workers must sign and date their H&S handbook and employee orientation checklist contained in Appendix I.

### Short Service or New Employee Mentoring

The Rafter D Corporation has a mentoring system to provide guidance to New Workers or Short Service Employees and assist with their development. A mentor may only be assigned to one crew that includes Short Service or New Employees, and he/she must remain on site with them. A mentor must be an experienced, knowledgeable employee.

### Additional Orientation and Training

The Rafter D Corporation will provide a young or new worker with additional orientation and training if

- a) workplace observation reveals that the young or new worker is not able to perform work tasks or work processes safely, or
- b) requested by the young or new worker.

### Documentation

The Rafter D Corporation will keep records of all orientation and training provided.

### The Rafter D Corporation will not employ workers under the age of 18 unless:

- They are enrolled in a registered apprentice program and over 16 years of age.
- They are attending a technical high school and intend to work in the construction field and are over 16 years of age.
- They are intending to graduate high school and enroll in construction related post-secondary education and are over the age of 16.
- Workers under the age of 16 are not permitted on any site, under any circumstance. This includes sub-contractors and family members.
- Where they are identified, sub-trades employing workers under the age of 18 must present a safety plan before such persons commence work, as to how they will protect these workers from injury, including work activities, experience, supervision, and training. Such workers may be refused work on the site based on lack of a plan, or lack of compliance to their plan.

**NO WORKERS UNDER THE AGE OF 18 ARE PERMITTED TO TAKE PART IN DEMOLITION, EXCAVATION, OR CONFINED SPACE ACTIVITIES OF ANY NATURE, AND ARE NOT PERMITTED ON SITES WHERE THIS ACTIVITY IS TAKING PLACE.**





Project Managers and/or Supervisors are responsible for communicating and enforcing The Rafter D Corporation's Policy on Young Workers to sub-trades employed on their projects.

## 7.5 Working Alone Program

### Working Alone Practice / Policy

The Rafter D Corporation is committed to ensuring the safety and well-being of all employees while working in the field. As part of this The Rafter D Corporation is dedicated to making sure all employees who work alone are able to do so in a safe manner.

A Working Alone Practice / Policy has been established to minimize and eliminate risks associated with safety, for employees who work alone or in isolation. Also, included are procedures for those employees who travel outside of the office on company business.

The Rafter D Corporation defines "to work alone or in isolation" as meaning to work in circumstances where assistance would not be readily available to the worker

- (a) in case of an emergency, or
- (b) in case the worker is injured or in ill health.

The working alone procedure applies whenever you are the sole The Rafter D Corporation employee in the workplace<sup>1</sup>, or whenever you are out on a job or travelling by yourself.

A worker is considered to be working alone or in isolation when he or she does not have assistance that is readily available in case of emergency, injury, or ill health. In order to determine whether or not assistance is readily available, the following conditions should be considered:

- Presence of others: Are other people in the vicinity?
- Awareness: Will other persons capable of providing assistance be aware of the worker's need?
- Willingness: Is it reasonable to expect those other persons will provide assistance?
- Timeliness: Will assistance be provided within a reasonable period of time?

All workers who are required to work alone will be provided training on The Rafter D Corporation's working alone procedures. This training will include the use of the cell phone, general hazards in the area, information on the frequency of calls and what will happen if necessary check-ins are not made. This training must be completed before an employee starts any working alone job. As the area hazards and the frequency of the calls may change, this training must be repeated before every working alone job. Regular contact must be made by the employer or designate with the worker that is working alone at intervals appropriate to the nature of the hazard associated with the worker's work. Working alone is not allowed when electronic communication is not possible unless the worker can be physically checked by another worker at designated intervals.

Any employee entering or leaving any building after hours should be aware of their surroundings (look for anyone lingering around) and only exit his/her car or the building when it appears safe to do so. Where possible, park in a visible area under street lamps, have your keys ready and have someone walk you to your vehicle.

Any employee working in the building outside of their normal scheduled working hours, especially on the weekends, must contact their Supervisor or designated contact when they arrive and leave the building.

---

<sup>1</sup> If two or more workers of different employers are working together or in the same vicinity and each worker is capable of and willing to provide assistance in a timely manner, this can qualify as assistance that is readily available. If a worker cannot be seen or heard by persons **capable of providing assistance** in a timely manner, then he or she should be regarded as working alone or in isolation.



Additionally, it is recommended that where applicable, a friend or someone at home be aware that you are working in the building alone or traveling. The contact person should have the office number and your extension and/or cell phone number.

Before any worker is able to work alone, a full hazard assessment must be completed by the site supervisor. This assessment will address all the likely hazards in the area and it should indicate if it is possible for work to be done alone given other factors such as the environment and the inherent dangers in the task to be performed. If the work cannot be performed in a safe manner while working alone, appropriate control measures must be put in place.

Prior to any worker being assigned which involves working alone, The Rafter D Corporation will identify any existing or potential hazards to which that worker is or may be exposed.

If a hazard is identified, The Rafter D Corporation will take measures before the worker commences the work assignment. These measures will include the elimination of the hazard, or if elimination of the hazard is not practicable, The Rafter D Corporation will reduce the risk of the hazard to the lowest level practicable.

The Rafter D Corporation will reduce the risk through the use of engineered controls, administrative controls or a combination of the two control methods.

Before work starts on any site that will have employees working alone, the following procedures must be established, and all workers involved must understand them.

- 1) Superintendents will instruct employees as to the location of the job site and any employee required to work alone will be equipped with a cellular phone and specific instructions for call-in times.
- 2) The general procedure for checking the employee's well-being will be a phone call every 2 hours beginning with 2 hours after the start of a shift. This contact is to be made by the employee calling in to the superintendent. If additional hazards are present in the work environment, the call-in frequency may be increased.
- 3) Each phone call the Superintendent receives must be recorded to show that check-ins are happening at the appropriate frequency.
- 4) When the shift is over the employee will make a final call to the superintendent to effectively "sign-out" for the day. The employee must not make this final call until he has returned to the shop / site office or final work destination. This phone call is the end of the shift and the employee must not do any job tasks after this call is made.

**Note:** If an employee does not make contact at the specified time, the superintendent will assume that an emergency has occurred and will proceed accordingly. In high-risk situations, The Rafter D Corporation will perform these checks at shorter timed intervals if the task permits.

### Checking the Well-being of the Worker

#### *The Rafter D Corporation has:*

- Developed and implemented a written procedure for checking the well-being of the worker assigned to work alone or in isolation if the worker might not be able to secure assistance in the event of injury or other misfortune.
- The procedure includes a time interval between checks and a procedure to follow if the worker cannot be contacted, including provisions for emergency rescue.
- A person will be designated to establish contact with the worker at predetermined intervals and results will be documented. This will include a check at the end of the work shift.
- This procedure has been developed in consultation with the Health and Safety Committee.
- Time intervals will be established in consultation with the worker assigned.
- The program will be reviewed annually.



### **Training**

Any person assigned to check on the worker assigned will be trained in the written procedure for checking the worker's well-being.

Training requirements will vary depending on the type of work being done.

- Worker must be trained in the safe work procedure for the work being done.
- Worker must be trained on how to conduct a hazard assessment for the work being done.
- Worker must be trained in the Working Alone safe work procedure

For more information, refer to The Rafter D Corporation STD 22.

## **8.0 Workplace Inspections**

### **8.1 Inspection**

It is the requirement of The Rafter D Corporation that all workers, supervisors and managers be accountable for reporting unsafe conditions found in the worksite as soon as practicable.

Workplace inspections are proactive approaches to safety and will be utilized to educate, evaluate and correct work practices and procedures. Planned inspections will occur on a regularly scheduled basis and will be supplemented by daily informal inspections. Each supervisor is responsible for assisting the HSE committee with scheduled inspections.

The inspections will consider premises, worksite, buildings, tools, equipment, machinery, work methods and practices. The supervisor or manager involved in the inspection will be responsible and accountable for ensuring corrective action is undertaken to eliminate or control any unsafe conditions or behavior found. All items found to require correction will be corrected to acceptable OHA safety standards.

Managers, supervisors and workers involved in inspections will receive training in responsibilities, legal requirements, recognition of hazards, use of inspection forms and reports.

All completed inspection reports will be evaluated and monitored by the health and safety committee.

### **8.2 Planned Inspections**

Planned inspections of all worksites by management will take place on at least a monthly basis.

The supervisor and, at minimum, one worker representing the safety committee, will perform regularly scheduled safety inspections.

The Safety Committee will arrange inspections. Inspection teams and areas to be inspected will be arranged in conjunction with the appropriate supervisor or manager.

### **8.3 Informal Inspections**

Supervisors should perform informal inspections as part of their regular daily activities.

### **8.4 Hazard Classifications (Class A, B, C)**

- Class A - Unsafe conditions or unsafe acts with the potential for permanent disability, loss of life or body part, and/or extensive loss of structure, equipment, material or environmental damage. Immediate corrective action is required.
- Class B - Unsafe conditions or unsafe acts with the potential for serious injury or property damage that is disruptive to production, process, or environmental damage, but less severe than Class "A" Hazards. Corrective action required within seven calendar days.



- Class C - Unsafe conditions or unsafe acts with the potential for minor injury, occupational illness, non-disruptive property or environmental damage, but less severe than Class "B" Hazards. Corrective and/or follow-up action required within one calendar month.

### 8.5 Preparing for Inspections

- 1) Review the previous month's inspection report.
- 2) Use a checklist of common hazards that you have developed using the experience of prior inspections.

### 8.6 Performing the Inspection

Inspection teams will tour the worksite noting safety concerns related to the physical work areas, equipment, structures, hazardous materials, work practices and work procedures.

- Examine the area of inspection systematically. Ask workers questions about the job to ensure that they have been properly instructed.
- If you find unsafe conditions, ask that they be corrected immediately, if possible.
- Machinery or tools that are defective must be taken out of use.
- Note all instances of unsafe acts or conditions.
- Look for patterns of hazards – improper use of fall protection equipment, for example, and make sure these are addressed in your report.

Ask questions of yourself as you move through the inspection. For example:

- Is the worksite tidy and properly maintained to reduce hazards?
- Is personal protective equipment being used (e.g. hardhats, hearing protection, safety glasses, steel-toed boots, etc.)?
- Is the worksite environment hazardous or unhealthy?
- Are controlled products clearly marked and are the material safety data sheets available?
- Are workers familiar with the instructions for their jobs?
- Are first aid provisions in place?
- Is a worker with the appropriate level of first aid identified?
- Is lighting adequate at all worksite areas?

### 8.7 After the Inspection

The results of inspections will be recorded on the inspection form as they are observed. The Supervisor will review all items on the Inspection Forms to ensure that the problems are corrected.

Inspection forms will be forwarded to the appropriate divisional or departmental manager. The manager and/or safety representative will review inspection reports, recommendations and corrective action responses. Any deficiencies not addressed will remain on the safety minutes under "Outstanding Items" until corrected. A yearly summary and analysis of inspection reports results will be produced by the safety committee and forwarded to all managers.

The Chair of the Safety Committee will bring any ongoing or recurring safety or health problems to all senior managers for further action, if necessary.

See Appendix for Inspection Forms



## 8.8 Vehicle Pre-trip Inspection – Commercial Vehicles

Commercial vehicles must be inspected every 24 hours when being operated. The Rafter D Corporation does not permit a driver to drive a commercial vehicle unless:

- a) the commercial vehicle has been inspected in accordance with the daily trip inspection requirements, and
- b) no major defect was detected in the vehicle during the daily trip inspection. A daily trip inspection is valid for 24 hours from the time recorded in the trip inspection report.

## 8.9 Mobile Equipment Pre-Trip Inspections

All mobile equipment, including but not limited to counterbalanced forklifts, rough terrain forklifts, scissor lifts, boom lifts, etc., must be inspected at the start of each shift or the first time that the equipment was used that day. The inspection must be documented in the inspection log book that is kept with each piece of equipment. Any defects in the equipment must be immediately reported to your supervisor. The piece of equipment must not be used until the supervisor has determined whether the equipment is okay to use, must be fixed, or must be quarantined prior to use.

## 8.10 Tools and Safety Equipment

All tools and safety equipment (i.e. fall protection gear) must undergo a pre-use inspection to determine if there are any defects in the equipment. Any defects found must be brought to the attention of your supervisor. Defects must be repaired, or the equipment must be replaced in order to ensure that the equipment meets the intended requirement.

# 9.0 Hazard Identification, Assessment, Elimination & Control

## 9.1 Hazard Assessment

It is the primary goal of the IIPP to provide the safest possible working environment for our workers and visitors. To achieve this, The Rafter D Corporation will monitor equipment and machinery and evaluate and control exposure to hazardous materials and conditions. The Rafter D Corporation will maintain a comprehensive program of hazard risk assessment at all worksites and work areas within those worksites.

Supervisors are responsible for directing formal hazard risk assessments in the work areas that they control and for involving safety committee members, first aid attendants, and workers in such hazard risk assessments.

Supervisors are also responsible for conducting ongoing informal hazard risk assessments of areas where workers are working, or it is planned that they will be working.

Workers are responsible for participating in and contributing to the hazard risk assessment program.

## 9.2 Training

All employees in field positions and shop positions shall be trained on hazard identification and control. Training will begin in the orientation on the employee's first day with the company and continue throughout their career with The Rafter D Corporation with both in-class and on the job training.

## 9.3 Introduction – Hazard Assessments

All personnel must be constantly aware of hazards and risks, whether real or potential, and report them immediately to their supervisor. Hazards and risks include unsafe or incorrect actions or work processes, defective or improperly maintained equipment, or the unsafe activities of fellow employees.

The IIPP is designed to identify, assess and control hazards. Proper hazard identification and control can help to effectively reduce the risk of losses. This section is designed to assist our workers in completing hazard assessments.



A hazard assessment (HA) is a procedure that examines the potential for loss resulting from dangerous worksite conditions or IIPP system's failures. It is management's responsibility to adequately assess the risk to the health and safety of The Rafter D Corporation workers by identifying, evaluating, prioritizing and ultimately controlling all the hazards in the worksite.

It is the workers, supervisors and management's responsibility to ensure that the identified hazards are eliminated and, where this is not practical, to ensure the risks are controlled, avoided and / or mitigated and that workers are protected from such hazards.

It is the duty of each worker to report, as soon as possible, any hazardous conditions related to the worksite. The Rafter D Corporation will, where possible, eliminate hazards and, thus, the need for personal protective equipment. If that is not possible, and where there is a requirement, workers will be required to use personal protective equipment, clothing, devices and materials for personal protection.

Hazard assessments are an ongoing component of the health and safety program. As the worksite evolves (new equipment, job design changes, machine upgrades, etc.) new hazard assessments are required. In many cases, a thorough examination of the tasks involved in an existing function often necessitates a hazard assessment.

A hazard assessment is an effective aid in developing or modifying safe work procedures. In fact, hazard assessments should precede the design of any new job procedure.

Part of identifying any hazards will include conducting a risk assessment on various jobs or work processes that employees may be required to do. A risk assessment MUST also be conducted prior to developing, revising or reviewing Safe Work Practices, Safe Job Practices and Environmental Best Management Practices.

Only those persons trained to do so should perform hazard assessments. When possible, hazard assessments should be completed by a team of involved personnel. This team should consist of a health and safety committee member, the worksite supervisor and a worker involved in the function being assessed.

To meet the legislative requirements for hazard identification, The Rafter D Corporation and all contractors and subcontractors will provide all necessary resources to ensure that hazard and risk assessments are effective, and they MUST allow for the following:

- Hazard and risk assessments prior to the start of all new projects, jobs, work processes or the introduction of new equipment or hazardous materials;
- Hazard recognition training for employees conducting hazard assessments,
- Allowance of time for personnel to complete their hazard assessment duties;
- Controls are put in place to eliminate or mitigate the hazards;
- All assessments are documented and properly recorded.

Unsafe or unhealthy work conditions, practices or procedures at our work facilities shall be corrected in a timely manner based on the severity of the hazards, and according to the following procedures:

- When observed or discovered;
- When an imminent hazard exists, which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection; and
- All such actions taken and dates they are completed shall be documented on the attached Identified Hazards and Correction Record\*

**A hazard assessment form must be filled out at every job location to assess the hazard related to the specific task or job. In the cases where the location of the job/task changes on the same jobsite, a new hazard assessment must be filled out as required by OSHA regulations.**



### A “Hazard”

A hazard is an unavoidable danger or risk, even though often foreseeable, may expose a person to a risk of injury or occupational disease.

### A “Risk”

Risk is the likelihood that the hazard will lead to injury or the probability of harm actually occurring. Risk represents the exposure to the chance of injury or loss.

### A Hazard Risk Assessment

Hazard risk assessment is considered a thorough examination of an operation (worksite, work-area, equipment, warehouse, office, etc.). Completed for the purposes of identifying what actual and potential hazards are present or could occur during the operational activity. A project hazard risk assessment should be completed prior to the start of a project.

At various times throughout a work project certain tasks may increase the risk to workers or property, a job / task hazard risk assessment will be required to identify these hazards.

### Hazard Inspections

Periodic inspections to identify and evaluate workplace hazards shall be performed by according to the following schedule:

- When our Injury and Illness Prevention Program was first established
- At least prior to beginning of the work shift.
- When new substances, processes, procedures or equipment that present potential new hazards are introduced into our workplace;
- When new, previously unidentified hazards are recognized;
- When occupational injuries and illnesses occur;
- When we hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
- Whenever workplace conditions warrant an inspection.

Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of The Rafter D Corporation Hazard Assessment Checklist, and any other effective methods to identify and evaluate workplace hazards.

## 9.4 Job /Task Hazard Risk Assessment

The supervisor or their designate will do job / task hazard risk assessments as required on specific tasks on an ongoing basis. When a high-risk task or job is to be performed for which there are no relevant safe work procedures or practices available for workers to review, a job / task hazard risk assessment will be completed.

Upon completion of the job / task hazard risk assessment, hazard controls will be developed, and safe work practices and procedures may need to be developed. It will be the responsibility of the supervisor to review these safe work practices and procedures with their workers prior to starting the job / task.

These assessments, safe work practices and procedures will be formally documented and maintained in Appendix I of all H&S manuals.

### Factors to Consider in Job / Task Assessments

- Skill needed to perform the job and expertise available
- Health monitoring results – noise, chemical/biological, air quality, etc.



- Corporate and industry incident statistics
- Government regulations
- Coordination between other workers
- Communication barriers such as blind spots, noise etc.
- The physical workloads imposed by the job
- Schedules and time restraints
- Frequency task is performed – daily, weekly, monthly, yearly
- Environmental factors such as weather, soil conditions, hazardous materials, etc.

**Job / Task Assessment Steps**

- Assemble workers involved in the job or task
- Review scope of work to be performed
- Break the job or task into individual steps
- Identify both actual and potential hazards
- Develop appropriate controls for each hazard
- Review the assessment
- Communicate the assessment and controls to all workers on the project

**9.5 Conducting Hazard Risk Assessment**

When conducting a hazard risk assessment, keep in mind that every worksite consists of **four (4) major components:**

- 1) The **people** (workers, sub-contractors, suppliers, clients, and visitors)
- 2) The **environment** they work in
- 3) The **materials** they work with
- 4) The **equipment** and tools they use

**Identification:** What are the hazards of the task?

**Consequences:** What are the worst possible results of an accident due to the hazard?

**Exposure:** How often will the workers be exposed to the hazard that could result in an accident?

**Probability:** What is the likelihood that the hazard will lead to an undesired consequence?

Upon completion of the general hazard risk assessment, the hazards will be prioritized, and a plan of action will be documented. Written work procedures will be developed to deal with the hazards identified in the hazard risk assessment.

**Classifying Hazards According to Risk**

The Rafter D Corporation classifies and ranks hazards according to risk. Risk may be determined by analyzing the probability of the hazard causing harm, the frequency the hazard is encountered, and the potential consequences of impact with the hazard. The following risk matrix should be used to assist employees with risk assessment.

**Level of Risk = Consequences X Probability**

<p><b>Consequences:</b> High (H or A) – Serious</p>	<p><b>Probability:</b> High (H or A) – Often Medium (M or B) – Sometimes</p>
---	--





Medium (M or B) – Moderate Low (L or C) – Minor	Low (L or C) – Rarely
--	-----------------------

**PROBABILITY**

	High	Med.	Low
High	H	H	M
Med.	H	M	L
Low	M	L	L

All HIGH and MEDIUM risks must have controls.

Follow up to ensure that all hazards have been minimized or eliminated and will be the responsibility of the supervisory staff on a project.

### 9.6 Hazard Control Measures

After a risk assessment has been completed to determine hazards, The Rafter D Corporation will develop practicable procedures to eliminate if possible or minimize the risk to its workers. Some of the control measures to be considered are as follows:

**Elimination:**

- Some tasks are redundant or may duplicate work

**Consider:**

- Can the task be avoided?
- Does the task need to be done to achieve the desired result?
- Can it be done in a way so workers are not exposed to the hazard?

**Substitution:**

If the task cannot be avoided, can part of the process employ other materials or methods?

Factors to consider:

- Can less hazardous materials be substituted to reduce the risk?
- Can different work practices be developed to reduce exposure to risk?

### 9.7 Engineering Controls

Engineering controls are physical arrangements, designs or alterations of workstations, equipment, materials, production facilities or other aspects of the physical work environment.

**Consider:**

- Can workstation / process be redesigned to reduce exposure to the hazard? For example, barriers, shields, scrubbers, area fans, local exhaust, etc.

### 9.8 Administrative Controls

Provision, use and scheduling of work activities and resources on the worksite, including planning, organizing, staffing and coordinating.



**Consider:**

- Can the work be scheduled to provide regular breaks away from the hazard?
- Can job be expanded to provide greater range of duties / time away from hazard?
- Can task be planned and organized to reduce risk (e.g. working shifts)?

**Personal Protective Equipment**

- PPE may be used as a substitute for engineering or administrative controls if it is used in circumstances in which those controls are not practical.
- PPE is only to be used when all other methods of eliminating, reducing or controlling risk are not practical.
- PPE includes physical equipment, individual engineering controls and/or specific training.

### 9.9 Critical Task Risk Management

A Critical Task is defined as “a task that has the potential to produce major loss to people, equipment, process, and/or the environment”.

The Rafter D Corporation has developed a Critical Task Inventory based on the type and frequency of work performed by our major trade groups. Specific Performance Standards, SWPs, SJPs, have been developed to set expectation and provide direction to ensure that the risks associated with these tasks have been adequately addressed. The Rafter D Corporation Critical Task Inventory is comprised of the following:

- 1) De-energization and Isolation, Lock-Out and Tag-Out of Equipment and Systems
- 2) Working at Heights Management (including Fall Protection and Falling Object Control)
- 3) Lifting Operations Management (Craning and Rigging)
- 4) Confined Space Management
- 5) Hazardous Material Control
- 6) Equipment Safeguarding
- 7) Motor Vehicle Operation (both on and off-road)

Detailed programs have been developed to address each of these key risk areas and these are presented in detail in the remaining sections of the IIPP Manual. In addition, a Risk Registry is developed for each major project to ensure that the risks associated with the full scope of the work are addressed.

### 9.10 Hazardous Environments

Where noise, heat, dangerous substance, lack of oxygen or any other factor creates a hazardous environment at any work area, the environment will be monitored.

If, during any work process, a worker is or may be exposed to a hazardous substance, The Rafter D Corporation will ensure that: (a) a walkthrough survey is conducted to assess the potential for overexposure considering all routes of exposure, including inhalation, ingestion, and skin contact, and (b) reassessment is conducted when there is a change in work conditions which may increase the exposure, such as a change in production rate, process, or equipment. If the walkthrough survey reveals that a worker may be at risk of overexposure to an airborne contaminant, The Rafter D Corporation will ensure that air sampling is conducted to assess the potential for overexposure.

When workers are in situations that could result in heat stress or cold stress, The Rafter D Corporation will monitor the temperature and provide written procedures for removing or minimizing the risk of heat stress or cold stress.

The Rafter D Corporation will ensure that appropriate emergency washing facilities are provided within a work area where a worker's eyes or skin may be exposed to harmful or corrosive materials or other materials which may burn or irritate.



The Rafter D Corporation ensures that no worker is exposed to a substance that exceeds the ceiling limit, short-term exposure limit, or 8-hour TWA limit prescribed by ACGIH.

When environments are contaminated beyond regulated limits, workers will not enter them or be permitted to work in them unless:

- The workers have been trained for the situation
- A supervisor gives prior approval
- Proper protective equipment is worn
- The workers follow established procedures

### **H2S – Hydrogen Sulphide**

The Rafter D Corporation recognizes that there is a potential worker exposure to hydrogen sulphide on certain work sites. This would include any site that processes either gas or oil in raw form such as oil batteries, gathering stations and gas processing plants.

The Rafter D Corporation will ensure that a worker's exposure to H2S is kept as low as reasonably achievable. The Rafter D Corporation will ensure that a worker's exposure to H2S does not exceed its occupational exposure limit of 10 ppm at any time.

At no time will our workers be exposed to H2S at a concentration exceeding its ceiling limit of 10 ppm without the use of respiratory equipment (supplied air respirator).

Following industry practice, it is a requirement that any worker who is entering a worksite where hydrogen sulphide is present, must be trained and certified in the H2S Alive training program. This training program includes rescue.

All The Rafter D Corporation employees who are sent to any location that may have a potential of H2S exposure, are trained and certified. Any worker entering site will also be required to attend customer's indoctrination program before work begins. The Rafter D Corporation requires that the customer has tested the levels of H2S prior to work beginning to ensure exposure does not exceed occupational exposure limits.

If a worker is or may be exposed to H2S, The Rafter D Corporation must ensure that: (a) a walkthrough survey is conducted to assess the potential for inhalation overexposure, and (b) reassessment is conducted when there is a change in work conditions which may increase the exposure, such as a change in production rate, process or equipment. If the walkthrough survey reveals that a worker may be at risk of overexposure to H2S, Stampede will ensure that air sampling is conducted to assess the potential for overexposure.

The Rafter D Corporation will ensure that a worker who may be exposed to H2S: (a) is informed of the health hazards associated with exposure to that substance, (b) is informed of measurements made of airborne concentrations of harmful substances at the work site, (c) is trained in procedures to minimize the worker's exposure, and (d) is provided with the appropriate respiratory protection.

The Rafter D Corporation does not provide services for any customer whose premises contain:

- a pure substance in an amount exceeding 22 pounds, or
- a mixture in which the amount of the substance is more than
- 22 pounds and at a concentration of 0.1 percent by weight or more at a worksite.

Therefore, we do not require a Code of Practice for Hydrogen Sulphide.

### **Procedures to be followed in case of H2S release:**

In case of an H2S emergency the following seven steps must be followed:

There are seven steps to take during an H2S emergency.



- 1) **Evacuate immediately.** An H2S alarm indicates that there may be hazardous concentrations in the building or area. Get to a safe new area immediately by moving upwind or crosswind from the release. Move to higher ground in possible.
- 2) **Sound the alarm.** Immediately notify someone that there is an H2S release, relay any information you may have and that you may require assistance.
- 3) **Assess the situation.** Do a head count and consider other hazards.
- 4) **Protect rescue personnel.** Put on SCBA/SABA to protect rescue personnel. If necessary, shut down the plant.
- 5) **Rescue victim.** Start by ventilating the building with fans or by opening all doors. If safe, you may perform the rescue by yourself with backup or with assistance. Enter the area and remove the victim to fresh air (upwind if possible).
- 6) **Revive victim.** Apply artificial respiration or CPR on the victim until the victim revives or until help arrives. Only qualified personnel may use mechanical resuscitators or oxygen.
- 7) **Get medical aid.** All H2S victims require medical attention. Even if they revive quickly, there is still a possibility that the lungs may collect fluid some hours after exposure. Arrange a transport of the victim to medical aid and provide the necessary information to Emergency Medical Services.

### Machinery and Equipment

Supervisors will ensure that:

- Equipment and machinery is suited for the job to be done
- All equipment and machinery are properly maintained through a schedule of preventive maintenance
- Unsafe or defective equipment and machinery is removed from service and repaired or replaced
- Operation manuals are provided when required by Occupational Health and Safety Regulations
- Logbooks for maintenance and repair are maintained where and when required by OHS Regulations
- Specific instruction regarding equipment maintenance is given in Section 12 of this manual.

### 9.11 Environmental Controls

The Rafter D Corporation will ensure that:

- A complete chemical inventory for products used or stored in the work area is available
- All controlled products on the worksite are identified with proper supplier or worksite labels
- Material Safety Data Sheets (MSDS) for the products are made available to workers
- All tanks, piping systems or other storage containers are labeled or identified as to contents, hazards and precautions for handling and disposal of controlled materials
- All workers receive education and training to safely store, handle, use, or properly dispose of these products
- The key elements of worksite environmental control are recognition, evaluation and control. Each is described below:

#### Recognition

Workers, who are exposed to hazardous material or conditions, must be trained to recognize hazards in:

- Waste products
- Maintenance operations



- Storage practices
- Work processes that involve noise or hazardous materials

### Evaluation

Recognized hazards must be regularly monitored to ensure that proper procedures and/or protective equipment are used to reduce the hazard to an acceptable level.

### Control

Hazard control will include:

- Good housekeeping
- Adequate supply of required protective equipment
- Education and training to ensure workers are aware of and able to respond to hazardous materials and conditions

## 9.12 Hearing Protection Program

Where workers are exposed to high levels of noise, The Rafter D Corporation will establish and maintain a Hearing Protection Program designed to minimize the effect of noise on workers. This program will include the monitoring and labeling of high noise areas. When information indicates that employee exposure may equal/exceed the 8-hr time-weighted avg. of 85 decibels, a monitoring program shall be implemented to identify employees to be included in the hearing conservation program.

In areas of high-level noise, The Rafter D Corporation will post warning signs and will provide the necessary hearing protection for workers. Wherever possible, The Rafter D Corporation will control noise at its source.

The Rafter D Corporation workers, in any area where the work in progress exceeds the following decibel levels, must wear hearing protection:

- Daily Exposure (8-hour Shift – 85 dBA Lex
- Peak sound level (impact noise) – 135 dBA

**Note:** With noise levels of 85 dBA you cannot carry on a conversation in a normal tone while standing 1.5 meters from another person.

Due to the ever-changing workforce, The Rafter D Corporation makes classes “C” and “D” disposable earplugs available to all workers when their use is required. Where decibel levels exceed 105 dBA, and cannot be effectively controlled, class “A” earmuffs will be provided.

The Rafter D Corporation ensures that all reasonably practicable measures are used to reduce the noise to which workers are exposed in areas of the work site where workers may be present. Where noise cannot be controlled to an acceptable level, The Rafter D Corporation ensures that affected workers wear the required hearing protection equipment.

Where it is found that workers will be exposed to potentially harmful levels of noise or when information indicates that a worker may be exposed above 85 dBA, The Rafter D Corporation will measure the noise exposure and a record kept of the noise measurement results. The results of any noise measurements taken will be posted at the site office and the areas involved will have signs posted warning of the hazard.

The Rafter D Corporation educates workers in-house in the hazards of exposure to excess noise, and trains workers in the correct use of control measures and hearing protection. The training includes the selection, use, and maintenance of hearing protection equipment required to be used at a work site in accordance with the manufacturer’s specifications. The training shall be repeated annually for each employee. Training shall be updated consistent to changes in PPE and work processes. The noise exposure procedures shall be made available to the worker and will be posted on the worksite. The Assistant Secretary and the Director shall have access to records as



required. The hearing protection shall be evaluated for the specific noise environments in which the protector will be used.

All hearing protection supplied will meet ANSI Standards.

<b>Maximum Equivalent Noise Level</b>	<b>Recommended Class of Hearing Protector</b>
Leq less than 85 dBA	No Protection Required
Leq up to 89 dBA	Class C
Leq up to 95 dBA	Class B
Leq up to 105 dBA	Class A
Leq up to 110 dBA	Class A plug and Class A or B Muff *
Leq more than 110 dBA	Class A plug and Class A or Class B Muff * and limited exposure

\* Both plug and muff must be worn.

**Hearing Protection:**

- **Class C** – Disposable earplugs
- **Class B** – Some disposable earplugs and ear protectors (muffs)
- **Class A** – Ear Muffs only
- If annual hearing testing is required in a jurisdiction, an outside professional hearing consultant will be used to:
  - Evaluate all audiograms performed for all workers in the Hearing Conservation Program with recommendations and necessary referrals and follow-ups.
  - Provide a list of qualified local audiologists for referral purposes and for communication with these physicians on specific problems.
  - Worker assistance and evaluation to be provided through annual site visits.

An audiometric testing program will be established for the jurisdiction it is required in and maintained by making audiometric testing available to all worker whose exposures equal or exceed an 8-hr. time-weighted avg. 85 decibels. Within 6 months of an employee's first exposure at or above the action level, a baseline audiogram shall be established against which future audiograms can be compared. When a mobile van is used, the baseline shall be established within 1 yr. Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. Hearing protection may be used to meet the requirement. Employees shall also be notified to avoid high levels of noise.

At least annually after obtaining the baseline audiogram, a new audiogram for each worker exposed at or above an 8-hour time-weighted average of 85 decibels. Each worker's annual audiogram shall be compared to the worker's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift has occurred. If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift, the worker shall be informed of this in writing, within 21 days of the determination. Unless a physician determines that the standard threshold shift is not work related or aggravated by occupational noise exposure, The Rafter D Corporation shall ensure that worker's already using hearing protectors and be refitted and retrained in the use of hearing protectors, offering and providing hearing protection of greater attenuation if necessary. The worker shall be referred for a clinical audiological evaluation or an



ontological examination, as appropriate, if additional testing is necessary or if a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors.

Accurate records of all employee exposure and audiometric measurements shall be maintained as required by the regulation

#### **Worker Responsibility – Hearing Program**

Workers are requested to inform their supervisors of changes that may impact the safety of the workplace or that may affect the noise levels.

Every worker is required to follow the requirements of this program.

### **9.13 OSHA Hazard Communication Standard (HZCOM)**

Employers that have hazardous chemicals in their workplaces are required by OSHA's Hazard Communication Standard (HCS), 29 CFR 1910.1200, to implement a hazard communication program. The program must include labels on containers of hazardous chemicals, safety data sheets (SDSs) for hazardous chemicals, and training for workers. Each employer must also describe in a written program how it will meet the requirements of the HCS in each of these areas.

Supervisors must understand and implement all HAZCOM requirements; training will be provided annually.

It is the policy of The Rafter D Corporation that all employees working with any hazardous materials will be oriented upon hire as to the essentials of HAZCOM including:

- a) procedures for the safe use, storage, handling and disposal of the controlled product,
- b) the safe use, storage, handling, and disposal of a controlled product contained or transferred in a pipe or a piping system including valves, a process or reaction vessel, or a tank car, tank truck, ore car, conveyor belt, or similar conveyance,
- c) procedures to be followed if the controlled product escapes from equipment, or from another product, and
- d) procedures to be followed in case of an emergency involving a controlled product.

#### **HAZCOM Requirements:**

##### **Step 1 – Learn the Standard/Identify Responsible Staff**

- Obtain a copy of OSHA's Hazard Communication Standard.
- Become familiar with its provisions.
- Make sure that someone has primary responsibility for coordinating implementation.
- Identify staff for particular activities (e.g., training).

##### **Step 2 – Prepare and Implement a Written Hazard Communication Program**

- Prepare a written plan to indicate how hazard communication will be addressed in your facility.
- Prepare a list or inventory of all hazardous chemicals in the workplace.

##### **Step 3 – Ensure Containers are labeled**

- Keep labels on shipped containers.
- Label workplace containers where required

##### **Step 4 – Maintain Safety Data Sheets (SDSs)**

- Maintain safety data sheets for each hazardous chemical in the workplace.
- Ensure that safety data sheets are readily accessible to employees.



**Step 5 – Inform and Train Employees**

- Train employees on the hazardous chemicals in their work area before initial assignment, and when new hazards are introduced.
- Include the requirements of the standard, hazards of chemicals, appropriate protective measures, and where and how to obtain additional information.

**Step 6 – Evaluate and Reassess Your Program**

- Review your hazard communication program periodically to make sure that it is still working and meeting its objectives.
- Revise your program as appropriate to address changed conditions in the workplace (e.g., new chemicals, new hazards, etc.).

**Supervisor's Responsibilities – HAZCOM**

The Rafter D Corporation will make information concerning hazardous/controlled products available to workers. This information will include the manufacturer's safety data sheet and appropriate methods and safeguards for dealing with the product.

**We will ensure that workers are trained in:**

- 1) What HAZCOM hazardous products they are working with
- 2) How to protect themselves
- 3) What to do in the event of an exposure
- 4) Where to go for first aid and how to clean up the spilled material

Supervisors will ensure that if a worker is or may be exposed to a chemical or biological substance which could result in an adverse health effect, the supervisor will ensure that the identity of the substance, its possible effects on worker health and safety and any precautions required to protect the health and safety of the worker are clearly communicated to the worker.

Supervisors will ensure that all hazardous products used within their area are properly labeled and stored. They will also ensure that the appropriate material safety data sheets are available at all worksite locations. Supervisors will ensure that all workers who handle hazardous or controlled products are properly trained to recognize and understand the hazardous labels.

Supervisors will ensure that written safe work procedures and emergency procedures for all hazardous materials are available and that workers are properly trained in these procedures.

Supervisors will provide the proper personal protective equipment and ensure that its use is understood. Other necessary materials such as spill kits will also be provided.

Workers are responsible for following these safe work procedures and for reporting any containers that may lack labels or have unreadable labels.

The Supervisor is responsible for maintaining a current MSDS file and for knowing the first aid procedures for workers who may be exposed to HAZCOM controlled products.

**9.14 Electrical Safety**

Only licensed electricians and qualified technical personnel are authorized to repair or make alterations to electrical equipment.

Safety-related work practices shall be employed to prevent electrical shock or other injuries resulting from either direct or indirect electrical contacts when work is performed near or on equipment/circuits that may be energized. The specific safety-related work practices shall be consistent with the nature and extent of the associated electrical hazards.





### 9.15 Lock-Out/Tag-out

While any worker is exposed to contact with parts of fixed electrical equipment or circuits which have been de-energized, the circuits energizing the parts shall be locked out or tagged, or both.

Workers who perform maintenance activities on equipment will be provided training on the Lockout Tag-out training program. Employees who work in areas where Lockout Tag-out may be performed will be provided awareness training.

The circuits and equipment to be worked on shall be disconnected from all electric energy sources. Control circuit devices, such as push buttons, selector switches and interlocks, shall not be used as the sole means for de-energizing circuits or equipment. Interlocks for electric equipment shall not be used as a substitute for lockout and tagging procedures. Turn off and/or disconnect energy control points, such as electrical plugs, switches, valves, and circuit breakers.

Workers shall place their own personal lock and tag on each energy control point.

Stored electrical energy that might endanger personnel shall be released. Capacitors shall be discharged, and the high capacitance elements shall be short-circuited and grounded if the stored energy might endanger personnel.

Stored non-electrical energy in devices that could re-energize electric circuit parts shall be blocked or relieved to the extent that the circuit parts could not be accidentally energized by the device.

Ensure that all stored energy is restrained or dissipated prior to working on the task. This includes, but is not limited to, the following:

- a) Compressed springs - block springs from releasing,
- b) Parts of a machine held up by hydraulic or pneumatic power - block to prevent parts from falling,
- c) Pressurized lines - bleed the pressure from the lines,
- d) Components that are hot - allow sufficient time for cooling before work begins,
- e) Capacitors that may store electrical energy - discharge the energy from the capacitor.

Electrical equipment that might be fed by more than one source should be tested with a voltage meter to verify the absence of electrical energy.

## 10.0 Accident / Incident Investigation Procedures

### 10.1 Accident / Incident Investigation

The Rafter D Corporation requires the proper investigation into all accidents, incidents, near misses and occupational health issues to determine the probable causes and subsequently the corrective actions to be implemented to ensure that the accident/incident is not repeated. This includes equipment and environmental damage as well as no lost time and lost time injuries.

The Rafter D Corporation requires all workers to immediately report to their supervisor all accidents and incidents that result in injury or property damage. Near-miss incidents or close calls that had the potential for serious injury or property damage must also be reported.

Whenever possible, investigations will take place during the shift of occurrence and will be investigated by a safety committee member with the participation of the supervisor in charge.

All investigations will be completed on The Rafter D Corporation Accident/Incident/Near-Miss Investigation Forms and will be forwarded to the divisional manager for review and action.

All incidents, property damage, first aid injuries and medical aid injuries must be reported to your supervisor as soon as it is practical to do so.



## 10.2 Immediate Notice of Certain Accidents

All work-related incidents (including those relating to health, safety, environment and property damage), near misses, injuries, illnesses or diseases must be reported to your supervisor and the designated first aid attendant at the earliest practicable opportunity. The incident reporting requirements and protocol are described in ***The Rafter D Corporation SWP, Incident Reporting***.

In the event of an injury, first aid attendants are required to complete any and all necessary paperwork related to treatment given according to State and other government procedures and regulations and to their training. This will initiate a thorough investigation, interviews of witnesses and the implementation of the appropriate corrective action to prevent the incident from recurring in the future.

The Rafter D Corporation Management and the HSE department shall be informed of any incident, as soon as reasonably practicable and not later than 24-hours if the incident resulted in medical treatment or is required to be reported to the OSHA.

An employer must immediately notify DOSH by telephone or telegraph of the occurrence of any accident that:

- a) Resulted in **serious injury** to or the death of a worker,
- b) Involved the major release of a hazardous substance, or collapse of a building, bridge, tower, crane, hoist, temporary construction support system or excavation.
- c) Any vehicle accident involving a minor or senior.
- d) Where an incident report is required by H&S regulation.
- e) Except as otherwise directed by an H&S officer, officer of the OSHA or a peace officer, a person must not disturb the scene of an accident except so far as is necessary to:
- f) Attend to persons injured or killed,
- g) Prevent further injuries or death, or
- h) Protect property that is endangered as a result of the accident.

## 10.3 Accident Investigation Overview

Proper accident investigation techniques are an important part of an effective Health & Safety Program.

All accidents and near misses will be investigated as soon as possible.

An investigation shall start within 24 of the incident being reported. Incident investigation reports shall be completed and submitted to management no later than 7 days of the incident occurring. The incident investigation requirements and protocol are described in ***SWP, Incident Investigation***.

Interviews with workers and witnesses should take place the same day, if at all possible. The worksite will also give valuable clues as to the reasons for the accident if it is examined before anything is moved.

The supervisor of the area will form part of the investigation team, together with a worker representative who is familiar with the work process. The purpose of the investigation should be to prevent future occurrences.

All accident or incident investigations should be initiated as soon as possible after the occurrence. The goals of proper investigation are to:

- 1) Prevent a recurrence of the accident.
- 2) Identify the cause or causes of the accident/near miss.
- 3) Recommend the action needed to correct the hazardous situation and ensure that a process is established to make the corrections quickly.

**In the case of a fatal accident**, the accident scene must not be disturbed except to attend to the fatally injured individual, other seriously injured workers or to protect further injuries or property damage.



Refer to **Section 7.4** of the manual for additional procedures involving serious injuries or fatalities.

All environmental incidents must be reported to your supervisor.

## 10.4 How to Begin an Accident / Incident Investigation

### Preserve the Scene

The first concern is to preserve the accident scene, as far as this is possible. In the case of a fatality, a 911 emergency call will be placed immediately. You must immediately contact the OSHA office with jurisdiction if there is a critical injury or fatality.

### Accident Requiring Investigation

An investigation will begin immediately in the case of:

- Any accident, which resulted in an injury requiring medical attention, or did not involve injury but had a potential for causing injury

The investigation will:

- Be carried out by someone who has knowledge of the type of work involved; typically, the immediate supervisor
- Where possible, involve one worker representative and one employer representative in the investigation
- Determine the cause or causes of the accident
- Identify any unsafe conditions, acts or procedures which contributed to the accident
- Develop appropriate corrective action to prevent similar accidents

The supervisor or safety committee member and a worker familiar with the work activity will collect and consider any written or photographic information about the accident.

## 10.5 Conducting the Investigation

### a) Consider the pre-accident situation:

- What was the general status of the worksite – supervision, safe work procedures, maintenance programs, etc.?
- What was the general status of the injured worker - age, gender, occupation, years of experience, training, etc.?

### b) Evaluate the immediate accident situation:

- What work was being done?
- Did the particular situation have written safe work procedures and were they being followed?
- Was the work being done in a normal procedure?
- Were there any special conditions?
- What materials and equipment were involved?
- Was the necessary personal protective equipment available and was it being used and worn in the proper way?
- What other workers were present and what was their role?
- What sequence of events preceded the accident/incident?
- Was there anything special or different about these events?



- Was the worker doing work for the employer at the time of the accident?
  - What was the worksite like: temperature, noise, lighting, dust, chemicals, humidity, ventilation, weather and working surfaces (slippery, gravel, etc.)?
- c) Consider the post-accident stage:
- What factors increased or decreased the risk or the actual injury? Was personal protective equipment being worn? Was the machine guarded? Was the first aid response time good? Was the transportation to the hospital fast?
  - Visit the accident location and examine it carefully.
  - Collect all relevant information - sketch and photograph the scene, take measurements, get names of witnesses.
  - Complete the Accident Report Form. Make additional notes and comments as necessary. If in doubt, record the information.
  - Supervisors interview the witnesses and others who can contribute to the investigation. Do this in a controlled and comfortable environment. Arrange for an interpreter if needed.
  - Put the witness at ease; explain who you are and what your interest is in this investigation.
  - Conduct the interview in a private setting or room.
  - Make sure the witness understands that the purpose of the interview is to gather information, and not to place blame.
  - Let the witness answer the questions. Do not lead the witness to any conclusions you may have or document speculation or hearsay. Do not discuss other views of the accident.
  - Confirm what you have heard by repeating the witnesses' version of what happened. Clarify your understanding with questions if necessary.
  - If there are apparent inconsistencies, tactfully try to clear these up, but do not argue with the witness.
  - Ask the witness if anyone else may have information to provide regarding the accident/incident.
  - Explain what will happen next and when the report will be complete.
  - Thank the witness for assisting with the investigation.

### 10.6 Writing the Report

Complete and forward the Accident Investigation Report.

The appropriate supervisors or safety committee member/designate must complete the Accident Investigation Report and send the report to the appropriate manager within 72 hours. A copy of the report should also be sent to the Corporate Safety Manager. The Accident Investigation Report will contain:

- Place, date and time of the accident
- Names and job titles of persons injured in the accident (names of the injured may be deleted from published report)
- Names of the witnesses
- A brief description of the accident
- A statement of the sequence of events which preceded the accident
- Identification of any unsafe conditions, acts or procedures which contributed to the accident



- Recommended appropriate actions to prevent similar accidents from reoccurring
- The names of the individuals who investigated the accident/incident

## 11.0 First Aid Services and Equipment

### 11.1 First Aid

The Rafter D Corporation is committed to providing and maintaining a first aid program for the purpose of minimizing the effects of job-related injuries and illnesses. The Rafter D Corporation will provide and maintain first aid services, supplies and equipment as required by the OSHA regulations for first aid. First aid services, supplies and equipment will be made available to all workers during working hours.

Workers who sustain a job-related injury or illness, regardless of seriousness, must immediately report to a first –aid attendant for treatment. It is also the responsibility of all workers to immediately report any injuries occurring at the worksite to their supervisor.

Workers that are certified in first aid will properly attend to all injuries and complete the appropriate documentation required. The first aid attendant will be in complete charge of all first aid treatment of injured workers until medical aid is available.

### 11.2 First Aid Service Requirements

In addition to OSHA Regulations for first aid, all first aid attendants will follow these special requirements:

- Use facemasks and latex gloves when the patient is bleeding.
- Use a bag and mask or pocket mask for artificial respiration.
- Clean up blood with great care. All areas must be cleaned with suitable disinfectant.
- Carefully dispose of blood-soaked materials in double wrapped plastic bags.
- Ensure that any cuts or abrasions on your body do not come in contact with the patient.

### 11.3 First Aid Procedures

In the event of an injury immediately see a First Aid Attendant.

The First Aid Attendant will be in charge of all first aid treatment until medical help arrives.

The First Aid Attendant will immediately provide first aid and then record the necessary information on a First Aid Record Sheet.

The First Aid Record Sheet will be available at all times for inspection by the Supervisor, HSE committee and Regional Human Resources Manager. Upon request, first aid records, by regulation, must be made available OSHA officers to review.

All first aid records and accident data will be kept for three years.

### 11.4 Serious Injuries

If a worker is injured and unable to continue working, the supervisor will:

- Call for emergency first aid from the first aid attendant
- In the case of a co-worker, the co-worker must notify the supervisor of details (who, what, when, where and how the accident occurred)
- If indicated, the supervisor or first aid attendant will make arrangements for the injured worker to see a physician or medical practitioner promptly



- If outside emergency service is requested, assist by watching for and directing this emergency service, as required.

In addition, the supervisor will ensure that:

- The worker gets prompt attention (first aid and/or medical)
- Arrange transportation to physician, clinic or hospital as appropriate
- An ambulance is called if the First Aid Attendant requests it
- Proper reporting and investigation procedures are followed
- If injured while on the road:
- All company vehicles have first aid kits
- If in a customer's facility, report to a supervisor and first aid attendant within the facility

### Minor Injuries

Minor injuries are when a worker seeks first aid but are able to continue working. The injury should be recorded in the first aid record book. No forms are required by the Workers' Compensation Insurance Providers if the worker did not require further medical attention. The first aid record serves as the record of the incident.

### 11.5 Exposure to Blood-borne Pathogens

The purpose of the blood-borne pathology exposure control plan is to ensure protection against all disease-causing micro-organisms that are present in human blood and/or body fluids.

The intent of this program is to comply with The Rafter D Corporation's Bio-hazardous Material Standard.

#### Scope

The blood borne pathogens procedure is designed for the safety and health of first aid attendants or other persons performing CPR and workers who must deal with waste removal.

Universal precautions will be practiced at all times to reduce the risk of exposure to first responders to the incident and other workers that are potentially exposed to infectious material. All blood, body fluid, or potentially infectious material will be considered infectious regardless of the perceived status of the source individual.

#### Hepatitis B Vaccination Program

All first aid attendants that have been identified as having potential exposure to blood or other potentially infectious materials will be offered the Hepatitis B vaccine, at no cost to the first aid attendant. The vaccine will be offered at the time of initial training or within 10 working days of their initial assignment to work involving the potential for exposure to potentially infectious materials.

Workers who initially decline the vaccine, but who later wish to have it, may then have the vaccine provided at no cost. All records of vaccination authorizations and dates of immunization, blood borne pathogen education and training records and post-evaluation and incident follow-up documentation with kept secured with the Human Resources Manager.

Workers who decline the Hepatitis B vaccine must sign a waiver.

#### Standard Precautions

- Wash hands with antiseptic wipes if there is any possibility of contact with blood, body fluids or human tissue. Wash hands with soap and water as soon as possible.
- Wear gloves when anticipating contact with blood, body fluids, tissues, mucous membranes or contaminated surfaces, or if breaks in the skin are present.
- Wear an impervious apron if splattering is likely.



- Wear a mask and eye protection if splattering is likely.
- Use mouth pieces or other resuscitation devices with one-way valves where there is a risk of inhaling bodily fluids.
- Handle sharp objects carefully. Dispose of all sharp objects into an appropriate container to prevent risk of further injury.
- Dispose of all spills that may contain contaminants in accordance with policies for hazardous waste disposal. Until clean-up is complete, rope off the affected area.
- Report all potential contamination of open wounds immediately.

### 11.6 First Aid - Personal Protective Equipment (PPE)

All PPE will be provided without cost to the worker. PPE will be chosen based on the anticipated exposure to potentially infectious materials.

#### Equipment provided will include at least:

- Latex gloves - Wash hands thoroughly and wear latex gloves
- Safety glasses or other eye protection
- Disposable masks
- Impervious aprons
- One-way valve CPR masks - Use mouth shield when performing artificial respiration (with one-way valve) try to avoid contact with blood or body fluids, where possible

All PPE will be replaced or repaired as needed. All used disposable PPE will be contained in biohazard disposal bags until they are removed from the worksite.

### 11.7 Clean Up Procedures

- Put on latex gloves
- Sprinkle chlora-sorb on spill. Let it set until all fluid is absorbed
- Using the pickup spatula or absorbent towels, scoop the congealed liquid into the red biohazard bucket
- Using the hand broom and dustpan, sweep up all traces of the chlora-sorb and soil. Try not to create dust.
- Place sweepings into the biohazard bucket
- Spray germ killing aerosol on the hand broom and dustpan and spatula. Let it set for 10 minutes, then wipe with absorbent towel. Place soiled towels into the yellow biohazard bucket. (If you suspect person of having AIDS, Hepatitis or any infectious disease, discard dustpan, broom and spatula in the biohazard bucket). Notify First Aid Attendant so that a new kit can be ordered.
- Close the opening of the biohazard bucket
- Remove the disposable gloves and place the gloves in the biohazard bucket
- Wash hands with antiseptic alcohol rinse. Allow to air dry.
- Spray a sterol brand deodorizer on the area to eliminate any lingering odor and as a final step in disinfecting area. Allow surface to air dry.
- After all handling and cleaning has been completed, rinse hands with antiseptic alcohol rinse. Allow hands to dry.



- In the event that there is a disposable artificial respiration mouth shield to be discarded, place this item into the biohazard bucket in the first aid room.

## 12.0 Labour/Management Health and Safety Committee

### 12.1 Health & Safety Committee

The Rafter D Corporation will establish Labour/Management Occupational Health and Safety Committee program as required to ensure that OSHA regulatory requirements are met and work rights to participate in the development and improvement of health and safety programs are exercised. One central committee has been implemented and additional committees are struck and supported for all major projects where 20 or more workers are present. The purpose of this committee is to encourage a unified effort between management and workers in identifying and resolving health and safety issues.

The HSE committee will have appropriate representation from management and workers. The committee will develop "safe-work" programs and procedures and maintain a safe worksite. The HSE committee will also promote compliance with and recommend changes to improve the IIPP.

Management will ensure that the HSE committee representatives receive adequate health and safety training. The Rafter D Corporation and its management will support the functions of the HSE committees and will allow them to meet a minimum of once per month.

Minutes of the committee meeting will be made available to all parties and posted in a common area for review.

### 12.2 Overview

- The Rafter D Corporation elects to use a labor/management safety and health committee meeting all the
- Requirements of T8CCR 3203 (7) (c) (1) - (7) to comply with the communication requirements of subsection (a)(3) of T8CCR 3203.
- If at any timer, our organization has less than ten employees, we will comply with the requirements of subsection (a)(3) of T8CCR 3203 by communicating and instructing employees orally in:
  - General safe work practices with specifics with respect to hazards unique to the employees' job assignment.
- The Rafter D Corporation will ensure that HSE committees are given the opportunity to meet and that they function effectively. The HSE committees will have equal representation from workers and from management.
- Meetings will be held once a month, at a regular time and location. The HSE committee Chairperson, or Co-chairperson will decide whether meetings are to be canceled or rescheduled, or if special meetings are to be called.
- There will be an agenda for the monthly committee meetings prepared by the HSE committee chairperson.
- Workers wishing to have safety concerns discussed by the committees will be encouraged to talk to any member of the committee.
- The purpose of each HSE committee on the worksite will be to assist in creating a safe worksite. This will be done by recommending actions that will improve the effectiveness of the IIPP, and by promoting compliance with H&S Guidelines and Regulations.
- The HSE committee is responsible for the continuing coordination of the health and safety activities when there are 20 or more workers at the worksite or more than one employer. An H&S Representative will have the same responsibility in locations with 10 or less workers.





- Each member of the Health & Safety Committees will receive appropriate health and safety training courses.
- The Health & Safety Committees will assist the supervisors in maintaining the Health and Safety Program.

### 12.3 Posting of Information

- At each worksite where workers of an employer are regularly employed, the employer will post and keep posted:
  - The names and work locations of the committee members
  - The reports of the three most recent committee meetings

### 12.4 Committee Responsibilities

The Health & Safety Committee has the following responsibilities:

- Establish and maintain a Terms of Reference
- Complete initial and ongoing training in committee function and operation
- Inspect the workplace on a monthly basis
- Hold regular monthly meetings
- Maintain meeting records
- Follow up on corrective actions to issues and opportunities for improvement that have been identified
- To identify situations that may be unhealthy or unsafe for workers and advise on effective systems for responding to those situations.
- To consider and expeditiously deal with complaints relating to the health and safety of workers.
- To consult with workers and The Rafter D Corporation on issues related to health and safety and the occupational environment.
- To make recommendations to The Rafter D Corporation and the workers for the improvement of the health and safety and the occupational environment of workers.
- To make recommendations to The Rafter D Corporation on educational programs promoting the health and safety of workers and compliance with the OSHA Regulations and to monitor their effectiveness.
- To advise The Rafter D Corporation on programs and policies required under the OSHA Regulations for the worksite and to monitor their effectiveness.
- To advise The Rafter D Corporation on proposed changes to the worksite or the work processes that may affect the health or safety of workers.
- To ensure that accident investigations and regular inspections are carried out as required by the regulations.
- To participate in inspections, investigations and inquiries as provided in the regulations.
- To carry out any other duties and functions prescribed by regulation.

### 12.5 Toolbox Meetings

Toolbox meetings shall be held a minimum of once per week with all workers for discussion of health and safety matters; identifying, prevention and correction of unsafe conditions; and maintaining interest in the safety of the



work force. Toolbox safety talks should be held at a set time such as when commencing new work activities, or as required for specific upcoming potential hazards.

Toolbox safety talks are one of the most effective ways for supervisors to demonstrate their own and the company's commitment to safety. Toolbox talks should be conducted with a specific topic for discussion, such as a new safety rule or procedure or a recent accident. **All workers must attend.**

### 12.6 Toolbox Meeting Checklist

#### 1) Choose a safety topic

- Choose a topic relevant to the work the team is doing

#### 2) Be Prepared

- Inspect the work area for hazards related to your topic
- Read over the material you plan to cover
- Make sure you are familiar with any regulations, guidelines and company rules related to the day's topic
- Review reports of recent accidents on the site, including "near misses"

#### 3) Get the team actively involved in the meeting

- Choose a real-life example (case study) to talk about
- Invite the team to ask questions and make suggestions related to the topic
- Respond to questions that you can answer and offer to find answers you don't know
- Allow time at the end of the meeting for questions and suggestions on any safety issue
- Ask the team for feedback on the meeting
- Involve the team in preparing for and/or leading future safety meetings. Follow up
- Look into complaints, concerns, and suggestions that the team brought up
- Report back to the team to let them know what will be done

#### 4) Records

- Use the Toolbox Meeting Record form to document the workers attending, the topics discussed, safe work practices, potential hazards, any suggestions and/or unanswered questions for later comment, and any corrective actions recommended or taken.

## 13.0 Records and Statistics

### 13.1 Statistics Practice

The Rafter D Corporation requires the development and maintenance of statistical recording procedures within its Health and Safety Program. Its purpose is to provide current and comparative information for management, supervisors and workers.

Records and statistics shall be compiled and maintained as essential tools to gauge and direct the effective operation of the HSE & IIPP programs. Records and statistics are useful as diagnostic aids in identifying and monitoring trends, unusual conditions and providing historical data on activities and improvements made within the program.

Statistics will be recorded and analyzed on claim costs, type of injury or illness, frequency and severity of accidents / Incidents, as well as the worksite locations of accidents. These statistics will be recorded on the Accident / Incident Analysis Reports by members of the safety committee and submitted to the manager for review.



Management shall provide relevant results from statistical analysis to supervisors, the Health and Safety Committees and HSE personnel to assist them in their endeavors of providing a safe work place.

The Rafter D Corporation will compare HSE & IIPP performance year to year.

### 13.2 Written IIPP & Documentation Requirements

Our organization has taken the following steps to implement and maintain our IIPP:

***Our organization has ten or more employees and keeps records as follows:***

- Records of scheduled and periodic inspections including the person(s) conducting the inspection, the workplace hazards (i.e., unsafe conditions and work practices that have been identified) and the action(s) taken to correct the identified unsafe conditions and work practices, are recorded on the Hazard Assessment Checklist\* and the Identified Hazards and Correction Record\* and the Investigation / Corrective Action Report\*. These records are maintained for at least one (1) year.

*If at any point, our organization has fewer than ten employees and maintains inspection records only until the hazard is corrected.*

Documentation of safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers are recorded on the Worker Training and Instruction Record\*. **This documentation is maintained for at least one (1) year.**

EXCEPTION 1 - Our organization has fewer than ten employees and maintains a log of instructions which is provided to employees with respect to hazards unique to their job assignments when first hired or they are assigned new duties.

EXCEPTION 2 - Our organization retains training records for the term of employment of employees who work for us for less than one (1) year. These records are provided to the employee(s) upon termination of their employment.

Records and statistics relating to safety will be kept by the HSE committee and submitted to the safety supervisor and divisional manager. The information will be used to identify problem areas and maintain/improve safety and health.

Records and statistics will be kept of the following:

**One-year Retention:**

- Planned workplace inspection reports
- Informal inspection reports
- Fire drills
- Tool box meeting records
- Tailboard discussions and risk assessments
- Records of workers suggestions
- Project meeting minutes
- Subcontractor orientation record
- Worker and Subcontractor safety commitments
- Records of subcontractor safety violations
- OSHA inspection reports, compliance reports, assessments
- Emergency preparedness documented drills
- Contaminated inventory forms



### Two-year Retention:

- Safety committee meeting minutes
- Management meeting minutes
- Monthly injury records
- Workers' Compensation claim cost statements
- First Aid treatment reports
- Incident and Accident investigations
- OSHA accident investigation reports
- Records of emergencies
- IIPP & HSE manual review records
- HAZCOM/MSDS sheets

### Permanent Retention

- Worker orientation records
- Education and training
- Worker safe practice training records
- Records of worker safety violations & Disciplinary Actions
- Notice of safety & health violations
- Records resulting from worker refusal to work
- First Aid training and certification records
- Monitoring data and worker exposure records (i.e. hearing tests)
- Medical surveillance records
- Corrective action records
- Maintenance & repair records of equipment, machinery & vehicles (kept for the life of the equipment)
- Mobile equipment inspections & log book

### 13.3 Statistics

Statistics including the frequency, severity and average lost-day rates are used as an indicator of the level of performance of The Rafter D Corporation health and safety program. They show the rate and duration of work-related lost time injuries and illnesses. The following guidelines are provided for producing the required statistics:

- Work-related injuries and illnesses to be included in calculations and are based on those with prescribed absence from work beyond the day of illness or injury occurrence.
- Illness and injury frequency, severity and average days lost rates will be determined each month:
- Incident rates will be based on 200,000-person hours.

Statistics shall include a mixture of both leading as well as lagging indicators. Monthly Safety Summaries shall be completed and reported to Management for each State that work is being done in.

### Miscellaneous



The Health & Safety Committees may review and discuss these records and statistics at their monthly meetings. The committees will make recommendations based on these reviews to management and the appropriate supervisors.

Supervisors will review statistics related to their areas of responsibility, safety committee minutes and recommendations. Where necessary, they will take action to correct safety problems identified.

## 14.0 Personal Protective Equipment

### 14.1 Personal Protective Equipment

The Rafter D Corporation shall provide and maintain safe and healthful working conditions and to follow operating practices that will safeguard all workers and result in efficient operations. The Rafter D Corporation requires every worker to wear or use suitable and adequate personal protective equipment (PPE) in any situation where an employee may be exposed to a workplace hazard and any time required by law, as required for the task to be completed safely or as directed by a Supervisor or Manager.

It is a requirement that all The Rafter D Corporation employees must wear appropriate Personal Protective Equipment whenever there is a foreseeable danger. A risk assessment shall be completed to determine the appropriate PPE.

All PPE used by The Rafter D Corporation will be within the requirements of State OSHA regulations. All PPE must comply with ANSI or ANSI standards.

All PPE will be maintained in accordance with manufacturer's instructions and requirements. No piece of PPE will be modified or changed contrary to manufacturer's instructions or specifications.

Workers are required to follow the rules concerning PPE at all times, without exception. Deliberately refusing to wear PPE or removing protective equipment, such as machine guards, will be considered an act of insubordination, and subject to corrective disciplinary action.

**The Rafter D Corporation considers deliberate safety violations that put workers or co-workers at risk very serious and disciplinary action may include suspension or termination.**

### 14.2 Overview

This policy establishes the requirements of personal protective equipment necessary to ensure all workers are properly protected from specific hazards in the worksite. Personal protective equipment is intended to safeguard workers against a variety of hazards. It must be available and properly used.

PPE is not intended to replace the need for other accident control measures such as machine guards, proper equipment maintenance or safe working procedures.

All employees will be trained in the proper use, care, limitations, and maintenance of PPE upon hire during the orientation process. A worker must use and wear properly, the appropriate PPE specified in accordance with the training, standards and instruction received, inspect the PPE equipment before using it, and refrain from using PPE that is unable to perform the function for which it is designed. The use of PPE itself must not endanger the worker and be compatible with the intended use and other pieces of PPE, so that one item of personal protective equipment does not make another item ineffective.

All Employees are responsible to maintain, clean/sanitize, and inspect their own PPE. If the PPE becomes defective or does not provide the required protection, the worker must return the PPE in question to the employer for replacement or repair and shall not continue working, where such equipment is required, until suitable replacement equipment is provided.

The Rafter D Corporation employees are required to report any potential hazards they are or become aware of to their immediate Supervisor/Manager in order for a safety assessment to be undertaken and all employees are required to inform their immediate Supervisor/Manager if it is believed their PPE is insufficient for any task that is to be undertaken by the employee or their fellow employees.



### 14.3 Applications/Exceptions

This program element applies to all The Rafter D Corporation facilities/operations, employees, contractors and visitors. There are no exceptions to The Rafter D Corporation's PPE program.

### 14.4 Responsibilities

**Supervisors** will ensure that all employees who are required to wear personal protective equipment are adequately instructed in the correct use, limitations, and assigned maintenance duties for the equipment to be used.

**Supervisors** will further ensure that the appropriate personal protective equipment is available to workers; properly worn when required; and properly cleaned, inspected, maintained and stored.

Personal Protective Equipment that becomes inoperable or damaged because of normal wear, or as a result of an incident or accident, must be returned for replacement.

It is the responsibility of the employee to maintain all PPE supplied, in good working condition. All PPE supplied must be kept clean (following manufacturer's guidelines), free of defects, used only for the intended purpose, inspected prior to each use and must be capable of performing the function for which it was designed.

Employees shall be properly attired wearing clothing that is appropriate for the type of work being conducted. The minimum attire suitable for construction work is covered in Safe Work Practice (SWP) 01, Personal Protective Equipment. The Rafter D Corporation requires the full use of protective clothing such as full time use of hard hats, hi-visibility vests and steel toe ANSI approved footwear. Gloves, eye protection and hearing protection must be worn and used when required.

- 1) Employees, Subcontractors and Visitors must wear any/all PPE when and where required.
- 2) The Rafter D Corporation will provide or ensure that all employees, subcontractors and visitors exposed to hazards are provided with the appropriate PPE prior to the start of work.
- 3) The Rafter D Corporation through its supervisory and safety employees will provide appropriate and specific training for specialized PPE prior to each new employee using the personal protective equipment.
- 4) Employees must receive training prior to wearing/using specialized PPE.
- 5) Employees must care for their PPE. They are responsible to ensure PPE is clean, taken care of and in good repair. Employees will receive training and instruction on how to care for and properly maintain any supplied PPE.
- 6) Employees and their supervisors will review hazards and the applicable PPE annually.
- 7) Any person not wearing PPE as required will be subject to disciplinary action.

### 14.5 Required Personal Protective Equipment

The basic kinds of PPE are briefly described below. The particular demands of the job may require additional PPE, as per OSHA Regulations.

#### Steel Toe Safety Footwear

All employees must wear the appropriate ANSI Approved steel toe footwear tied up properly at all times. If there is any risk of an ankle injury a 6-inch ankle high boot is mandatory.

All employees are required to wear appropriate ANSI Approved safety footwear while on the work sites (ANSI Approved Electrical Resistance Footwear may be required on certain jobsites). If there is a risk of ankle injury from twisting or slipping, the ANSI Approved Footwear must extend at least 6" up the leg and the laces must be tied as designed by the manufacturer at all times

Approved Safety Footwear is required on all worksites and in the shop and yard. Safety footwear is designed to



protect against foot hazards in the worksite. It protects against compression, puncture injuries, and impact. Safety footwear is divided into three grades, which are indicated by colored tags and symbols. Tag color tells the amount of resistance the toe will supply to different weights dropped from different heights. The tag symbol indicates the strength of the sole.

Only the **Green Triangle** grade of footwear is approved for The Rafter D Corporation worksites.

### Do:

- Always choose footwear according to job hazard and ANSI Standards
- Lace up boot and tie laces securely; boots don't protect if they are a tripping hazard, or they 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 cut boot to provide ankle support (less injuries)

### Don't:

- Wear defective safety footwear (i.e. exposed steel toe caps)
- Under protect your feet or modify safety footwear.

### Clothing & High Visibility Vest

Clothing must be worn in a safe and professional manner; no dangling neckwear, bracelets, wristwatches, rings or other similar articles can be worn, with the exception of medical alerts. Flame Resistant (FR) clothing must be worn if a worker may be exposed to a flash fire or an electrical equipment flashover. Employees must ensure that clothing worn beneath FR outerwear and against the skin is made of flame resistant fabrics or natural fibres that will not melt when exposed to heat. FR Clothing is to be maintained and cleaned in accordance with manufacturer recommendations.

Every employee must wear clothing appropriate for work. Field workers as a minimum will wear high visibility long sleeved shirts and long pants. Muscle shirts, cut-off shirts, shorts and running shoes are not suitable attire and will not be permitted. Workers must wear clothing that provides ample protection from weather and other hazards. When clothing may come into contact with moving parts of equipment, tools or machinery, the clothing must not be torn, ragged or loose and pants must not have cuffs and/or cuff controls must be worn.

Hi-Visibility clothing must be worn at all times on all projects and in the shop and yard. Ensure that hi-visibility clothing worn meets regulatory standards for the task being conducted. Example: Traffic Control Personnel have different hi-visibility standards to meet as opposed to other workers who are required to wear hi-visibility clothing.

### Eye Protection

This PPE is designed to protect the worker from such hazards as flying objects and particles, molten metals, splashing liquids and ultraviolet, infrared and visible radiation (welding).

#### **Safety Glasses**

All employees must wear appropriate ANSI eye protection devices when doing any work, which might cause foreign particles to enter the eyes (e.g. grinding, welding, cutting, particles, chipping, mixing grout, blowing, burning, drilling). Safety Glasses will be worn on all project and job sites.

#### **Safety Goggles**

Safety goggles by themselves do not provide adequate protection against chemical splashes and must be worn along with a face shield in areas where a chemical splash might occur.

When placing goggles on the face, make certain that the bridge of the goggles fits snugly against the nose. Adjust the headband so that the goggles fit securely. Goggles may be worn alone, over prescription glasses, or along with face shields. To remove goggles, pull headband away from the back of the head and over the head. This method



will reduce the possibility of dirt or particles dropping off the goggles and entering the eyes.

### **Face Shields**

Face shields are designed to protect the eyes and face from heavy impact, flying particles and, when used with goggles, from chemical splashes.

Properly fitting goggles, face shields or other approved eye protective equipment shall be worn by workers who:

- Are handling or are exposed to any material which is likely to injure or irritate the eyes
- Are engaged in any work in which there is a hazard of eye injury
- Have existing impaired vision of 20/200 in either eye or is blind in either eye

Basic eye protection includes eyecup goggles and mono frame goggles and spectacles with side shields. Industrial eye protectors shall meet the requirements of ANSI and any other standards acceptable to the OSHA.

Safety glasses should meet the following requirements:

- All safety glasses must have side shields
- Regular prescription lenses cannot be worn in lieu of approved safety glasses (“over-the-glasses” safety glasses can be supplied in this case)

### **Prescription Safety Eyewear**

Prescription safety eyewear must meet the requirements of ANSI, Industrial Eye and Face Protectors.

### **Contact Lenses**

Contact lenses **are not** an acceptable substitute for proper eye protection. It **is not** recommended that workers wear contact lenses where:

- Gases, vapors or other materials are present which, when absorbed by contact lenses, may harm the eyes
- Dusts or other materials are present which may harm the eyes or cause distraction, which may expose the worker to other injury
- Remember, hard contact lenses may break into the eye when hit

### **Do:**

- Ensure your eye protection fits properly (close to the face)
- Clean safety glasses daily, more often if needed
- Store safety glasses in a safe, clean, dry place when not in use
- Replace pitted, scratched, bent and poorly fitted PPE (damaged face/eye) protection interferes with vision and will not provide the protection it was designed to deliver).

### **Don't:**

- Modify eye/face protection
- Use eye/face protection that does not have an ANSI certification (ANSI stamp for safety glasses is usually on the frame inside the temple near the hinges of the glasses).

### **Eye Protection for Welders**

Welders and welder's helpers should also wear the prescribed equipment. Anyone else working in the area should also wear eye protection where there is a chance they could be exposed to a flash.

### **Hearing Protection**

Employees shall be provided with and shall wear hearing protection devices in accordance with the standards set





out by OSHA Regulation or ANSI Standards.

Hearing protection devices (muffs and/or plugs) must be worn when there is excessive noise (refer to local regulations for noise action levels) and when directed by your supervisor. Hearing protection must be selected and worn according to the applicable Standard.

Employees who are exposed to noise levels in excess of the ANSI allowable limits for noise must receive an annual hearing test provided by The Rafter D Corporation.

Hearing protection is designed to reduce the level of sound energy reaching the inner ear. The “Rule of Thumb” for hearing protection is:

Use hearing protection when you can’t carry on a conversation at a normal volume of voice when you are three (3) feet apart. Remember, this is only a rule of thumb. Any sound over 85 dBA requires hearing protection.

The most common types of hearing protection in industry are earplugs and earmuffs.

It is important to have different styles of hearing protection available as this allows workers a better chance of a good fit. One style may not fit every worker. If hearing PPE does not fit properly or is painful to use, the person will likely not use it. If the hearing protection is not properly fitted, it will not supply the level of protection it was designed to deliver.

Workers shall not wear muff type hearing protectors or headsets that have been designed or modified to accept AM or FM radio or other music sources. The worker is responsible for wearing hair and personal apparel in such a manner that the muff maintains an effective seal around the ears.

If, for some medical reason, a particular individual should not wear hearing protective devices, the employer, after being advised of this situation, will notify the OSHA of the medical reason involved and shall follow the directions they provide.

For further information, look at the ANSI Standard “Hearing Protectors”.

### Hand and Skin Protection

Employees handling materials likely to cut, puncture, abrade, burn or irritate hands or arms must wear gloves or other devices designed to protect the hands and arms from such injury.

PPE for hands include finger guards, thimbles and cots, hand pads, mitts, gloves and barrier creams. Choose hand PPE that will protect against the job hazard. Gloves should fit well and be comfortable. This type of PPE has to protect against chemicals, scrapes, abrasions, heat and cold, punctures and electrical shocks.

PPE for the hands comes in many forms, each designed to protect against certain hazards. Gloves most commonly used in industry are made from leather, cotton, rubber, synthetic rubbers and other man-made materials, or combinations of materials. Vinyl coated or leather gloves are good for providing protection while handling wood or metal objects. When selecting hand PPE, keep the following in mind:

- All hand protection selected and provided to workers shall properly guard against the identified hazard.
- All workers handling chemicals shall wear appropriate hand protection as recommended by the chemical manufacturer’s material safety data sheet (MSDS).
- All workers working with glass, knives, or other sharp objects shall wear gloves that guard against cuts.
- All workers who provide medical services (first aid or emergency), or who may come in contact with body fluids, shall wear gloves that guard against the transmittal or blood-borne pathogens.
- All workers on jobsites must have appropriate gloves with them in case they are needed.

The Rafter D Corporation will ensure that a worker’s skin is protected from any harmful substances that may injure the skin on contact or may adversely affect a worker’s health if it is absorbed through the skin. This will be achieved by supplying the worker with adequate coveralls, gloves, and face shields if necessary.



### **Fall Protection Equipment**

Workers shall be protected against falls greater than 6 ft. and shall review the fall protection plan prior to working at heights. The fall protection plan shall be prepared by a qualified person for the specified work site. The Rafter D Corporation Health & Safety Program must ensure that a fall protection system is used when work is being done at a place:

- From which a fall of 6 ft. or more may occur;
- Where a fall from a height of less than 6 ft. involves a risk of injury greater than the risk of injury from the impact on a flat surface;
- If the use of a fall arrest system is not practicable, or will result in a hazard greater than if the system was not used, the employer must ensure that work procedures are followed that are acceptable to OSHA and minimize the risk of injury to a worker from a fall;
- Before a worker is allowed into an area where a risk of falling exists, the employer must ensure that the worker is instructed in the fall protection system for the area and the procedures to be followed;
- A worker must use the fall protection system provided by the employer.

Incident investigations shall be conducted to evaluate the fall protection plan for potential updates to practices, procedures or training in order to prevent reoccurrence.

### **Fall Restraint System**

Where it is impracticable to install guardrails or barriers, workers working in excess of 6ft above grade, or where a fall from a lesser height involves and unusual risk of injury workers shall be protected from falling by use of a Fall Restraint System.

In a fall restraint system, a temporary anchor for a vertical lifeline, or for a lanyard used without a lifeline, must have an ultimate load capacity of at least 800 lbs. in any direction in which a load may be applied. In a fall restraint system, a permanent anchor for a vertical lifeline or for a lanyard used without a lifeline, must meet the requirements for a fall arrest anchor which is 5000 lbs

### **Fall Arrest System**

Where it is impracticable to install guardrails or barriers, workers working in excess of 6ft above grade, or where a fall from a lesser height involves and unusual risk of injury workers shall be protected from falling by use of a Fall Arrest System.

In a fall arrest system, an anchor for a vertical lifeline or for a lanyard used without a lifeline must have an ultimate load capacity of at least 5000 lbs., in any direction required to resist a fall, and if permanent be certified in writing by a professional engineer as having the required load capacity.

NOTE: For more information refer to OSHA Regulations.

Harnesses are used in construction to provide workers working at heights above ground level with freedom of movement and protection from falls. These devices will arrest a fall and absorb some of the shock of the fall. These devices are worn around the body and attached to a lanyard, fall arresting device or rope grab. Better quality systems usually have some form of shock absorber in the system.

A lifeline should not be used as a service line. The only time a lifeline becomes a load bearing line is thing the event of a fall. At all other times it should be just slack enough to permit free movement on the service lines.

In the construction industry, fully body harness systems used with a shock absorber are preferred over waist safety belts.

It is very important to get quality advice in the selection, purchase and maintenance of your fall arresting equipment.

Power Line Technicians climbing wooden poles shall use a Lineman's Body Belt and Lineman's Safety Strap - **See**



### ANSI Standards:

- “Fall Arresting Safety Belts and Lanyards for the Construction and Mining Industries”
- “Fall Arresting Devices, Personal Lowering Devices and Life Lines”
- “Lineman’s Body Belt and Lineman’s Safety Strap”

### Do:

- Obtain expert advice before purchasing a fall arresting device
- Properly train and practice with the system you decide to use
- Use webbing type harnesses instead of leather harnesses
- Use only the manufacturer’s components for the replacement parts
- Inspect carefully before each use (inspection to be performed by a trained worker)
- Have the harness fitted snugly to the worker using the system
- Ensure that the anchor points are secure and able to support the load in the event of a fall
- Follow the manufacturer’s instructions on care and use
- Ensure all lines used with the systems have thimbles
- Use only the proper safety rated fastenings with the system

### Don’t:

- Modify, change or put additional holes in the harness or hardware
- Jerry-rig the system
- Use the system for any other reason than its intended use
- Use the lifeline for a service line
- Use the harness after the expiry date on the harness

A training program shall be provided for each worker who might be exposed to fall hazards. Training shall enable each worker to recognize the hazards of falling & shall train each employee in the procedures to follow to minimize these hazards. Re-training should be provided when there are deficiencies in training, when work practices are changed or when fall protection equipment is modified. Written certification records showing participants, training dates, and signatures of instructors will be maintained.

The fall protection equipment meets at minimum ANSI Z 359.1, and/or OSHA regulations. The criteria shall be identified in the Fall Protection Plan, all workers must follow this plan. The Fall Protection Plan shall also describe rescue procedures, either self-rescue or provided rescue. This plan must be reviewed by the worker prior to working at heights, prompt rescue of workers is imperative to the health of the worker.

### Respiratory Protection

Employees exposed to high concentrations of dust, vapours, gases, noxious or toxic fumes, paint fumes, or an oxygen deficient atmosphere must wear respiratory protection devices appropriate to the material to which they may be exposed and must be trained in their proper use and care. (Ex: Respirator, Dust Mask and/or Half Mask Respirator) It is extremely important that you understand the materials and equipment you are working with, refer to ANSI Exposure limits, SDS Sheets and product information sheets for information to eliminate hazards.

Respiratory protection that has been properly fit-tested must be worn or carried on your person in those locations identified by your supervisor. If any of this equipment is not readily available or is in unserviceable condition, inform



your supervisor and it will be provided or replaced.

Every worksite must evaluate its' need for respiratory protection based on a hazard assessment.

Why is Respiratory Protection Required?

- 1) Oxygen deficiency
- 2) Toxic airborne contaminants:
  - Gas
  - Fume
  - Vapour
  - Smoke
  - Mist
  - Particulate

**Gas** Any substance that is in gaseous state at room temperature (carbon monoxide, chlorine).

**Vapour** Gaseous state of a substance that is normally a solid or liquid at standard room temperature (solvents, gasoline).

**Mist** Suspended droplets of an atomized mist (paint).

**Fume** Solid particulate of metallic origin generated by heat or chemical treatment of metals, .1 - 1 micron in size (welding fume).

**Smoke** Solid particulate generated by heat or chemical, .1 - 1 micron (airborne toxins from plastics, etc.).

**Dust** Fine solid particulate generated mechanically or by friction, 1 - 10 microns in size (drywall dust, grain dust).

### Oxygen Deficient Atmosphere

As part of the Confined Space Program, no one shall enter any confined space until a proper air quality test has been performed at which time the need of ventilation will be assessed. If ventilation is required and performed for the confined space, respiratory protection is not required.

### Head Protection

Injuries may result from objects falling from above but can also occur from side, front or rear impact. In addition, head injuries can result from workers contacting stationary objects, such as overhead pipes and protruding equipment. Safety headwear may prevent injuries such as skull fractures, concussions, burns and electrical trauma.

**Due to these risks, protective headwear is required at all times on construction project sites.**

Employees in work areas where there is a potential hazard to the head from falling, flying or projected objects, or other harmful contacts must wear safety headgear.

All employees who enter designated Hardhat areas must wear safety headgear.

Chin straps or other means of retention must be used on safety headgear when workers are climbing or working from a height in excess of 10 feet or are exposed to high winds or other conditions that may cause loss of headgear (i.e. Helicopters).



ANSI Approved TYPE “2” – CLASS “E” or “EG” Hard hats must be worn at all times on a work site unless the employee is:

- Inside a vehicle that provides protection from falling objects,
- Operating equipment that is equipped with overhead protection, or
- In a work location that has been designated by the project supervisor as having no danger of head injury from falling, flying, or thrown objects or other harmful contacts.

Safety headgear must meet the requirements of

- a) *ANSI Standard Z89.1-1986, American National Standard for Personnel Protection - Protective Headwear for Industrial Workers Requirements.*

If a worker may be exposed to an electrical hazard the safety headgear must have an appropriate non-conductive rating.

Parts of a hard hat:

- **Shell** – Deflects blows to the head. Replace a hard hat that shows signs of wear, scratches, gouges, or hairline cracks. Shells exposed to heat, sunlight, and chemicals can become stiff or brittle.
- **Peak** – Only wear the hard hat with the peak at the back, if the suspension has been adjusted so the nape strap remains at the back of the head. Check with the manufacturer to ensure the headwear was designed to be worn this way.
- **Suspension lugs** – Check the suspension lugs regularly. Long periods of normal use can damage the suspension. Perspiration and hair oils can speed up the deterioration of suspension materials.
- **Crown strap suspension** – Acts as a shock absorber. Look closely for cracked or torn adjustment slots, frayed material, or other signs of wear.
- **Adjustable headband** – Adjust the headband size so that headwear will stay on when bending over, but not so tight that it leaves a mark on the forehead.

Before wearing your hard hat:

- Make sure your hat is sized and adjusted properly for a good fit.
- Check that the webbing is in good shape and replace it when necessary.
- Clean your hard hat and webbing regularly with soap and water to remove dust, mold, and germs, and thereby increase its lifespan.
- Check your hard hat often for cracks, gouges, or other signs of damage. Replace it when needed.
- Do's:
- Do inspect headwear before each use.
- Do replace headwear that has been struck, even if no damage is visible.
- Do clean the suspension and shell regularly according to the manufacturer's instructions.
- Do remove and destroy any headwear if its protective abilities are in doubt.

**Don'ts:**

- Don't transport headwear in rear windows of vehicles.
- Don't paint the plastic shell. Paint solvents can make the plastic brittle and more susceptible to cracks.
- Don't put anything between the suspension and the shell.



- Do not drill holes, alter or modify the shell. Alterations may reduce the protection provided by the headwear.

### Personal Flotation Devices (PFDs)

Personal Flotation Devices (PFD's) or life jackets, with compliant retro-reflective material, must be worn properly zippered, buckled or tied on when a drowning hazard exists. The site supervisor or the HSE department will determine the presence of this hazard.

### Manufacturer's Specifications

The manufacturer's recommendations for any required PPE will be reviewed and complied in addition to any supplementary requirements enforced by The Rafter D Corporation policy and OSHA regulations.

### Flame Resistant Clothing

If a worker may be exposed to a flash fire or electrical equipment flashover, flame resistant outerwear must be worn. This outerwear, etc. Nomex coveralls, will be supplied by the employer.

In instances where a worker must wear flame resistant outerwear, any clothing worn beneath the outerwear and against the skin must be made of flame resistant fabrics or natural fibers that will not melt when exposed to heat. Examples of such fibers are wool, cotton and silk. It shall be the worker's responsibility to supply and ensure that he is wearing such clothing.

### Specialty Personal Protective Equipment

Specialty personal protective equipment must be used and maintained in accordance with all applicable laws, codes, acts and regulations. Training must be conducted prior to utilizing any specialty personal protective equipment.

## 15.0 Emergency Preparedness

### 15.1 Overview

An emergency can develop in spite of accident prevention programs and safe-work procedures. An Emergency Response Plan is essential to minimize confusion and delay in handling the emergency.

The Rafter D Corporation will develop a written emergency plan as required for each location. Procedures will be developed for the care, reporting and corrective follow-up of all injuries and serious accidents.

### 15.2 Posted Emergency Information

The following information must be posted and displayed in a common area visible to all workers:

- An area map of the worksite will be posted in at least one common area. The map will highlight all doors, emergency exits, fire extinguisher locations, first aid kit locations and fixed structures as well as the post-evacuation designated meeting area.
- Brief, but specific, instruction with the appropriate emergency contact numbers will be posted with every area map. The numbers must include as a minimum:
  - Fire
  - Police
  - Workplace Health & Safety
  - Poison Control Center
  - Water Company
  - Ambulance
  - Hazardous Materials
  - Nearest Hospital
  - Gas Company
  - Power Company



- Publicly posted with the area map and contact numbers will be brief step-by-step instructions that specify:
- Initial internal notification (e.g. contact supervisor, health and safety committee, receptionist, etc.)
- Immediate external notification (e.g. 911- emergency, fire, ambulance, poison control center, etc.)
- Proceed to appropriate designated meeting area
- Members of the Emergency Response Team must also be posted with the aforementioned information.

### 15.3 Emergency Response Team

The Rafter D Corporation will establish an Emergency Response Team consisting, at a minimum, of a supervisor, HSE committee or designated senior manager. Alternate members shall be assigned for each team member in case that person is unable to be contacted.

#### Duties shall include the following:

##### Supervisor

- Calls 911 emergency response number
- Takes control of emergency response on arrival at accident site
- Restricts access/secure area where incident occurred
- Evaluates potential for secondary incident
- Accounts for all workers
- Identifies injured person
- Contacts OSHA
- Contacts outside agencies (if necessary)
- Contacts emergency preparedness support team
- Calls HSE committee members
- Delegates tasks through the HSE committee
- Limits access in and out of scene from media and outsiders
- Briefs HSE committee on arrival
- Assists authorities (Workers' Compensation Insurance, OSHA, coroner, medical examiner, police, crisis counselor)
- Assists in gathering witness statements
- Gathers worker "Emergency Contact" sheets from Manager or Human Resources for family contacts information
- Recruits engineer to take to site incident/accident and goes through site inspection with engineer
- Contact person for consultants, insurance, lawyers, Workers' Compensation Insurance & OSHA
- Arranges off-site crisis counseling for workers

##### HSE committee or designate

- Attends scene of incident as soon as possible
- Assesses incident/accident-site inspection
- Assesses the general well-being of accident site personnel



- Gathers witness statements/completes witness interviews
- Assists authorities (Workers' Compensation Insurance & OSHA, coroner, medical examiner, police, crisis counselor)
- Secures area; assess and arranges for additional site security as required
- Completes safety reports for all agencies
- Informs key personnel of the incident

### Media

In the event of a serious incident it is highly likely that the media will respond to the incident. This could involve television video coverage, radio, or newspaper reporters. It is important for the benefit of the company, its workers, and the family of injured workers that the media is correctly managed. Under no circumstances should any employee speak to the media.

### Statements

The Emergency Response Plan designates Senior Management as the media spokesperson in all cases. All workers shall direct any media inquiries to the attention of Senior Management. Media statements should not be made without full investigation of the incident and knowledge of all facts. When confronted, inform the media that we are conducting an investigation and that there are no facts to give at this time.

### Media Control

The emergency response team shall ensure that media is restricted from having access to the worksite. Ensure that the media does not approach any worker for a statement.

## 16.0 Maintenance Program

### 16.1 Maintenance Overview

The Rafter D Corporation shall require that all tools and equipment will be properly maintained to reduce the risk of injury and/or property damage. The Rafter D Corporation requires all workers and supervisors to ensure that our established maintenance programs are completed to the required schedules. Any safety concerns regarding any equipment will be reported as soon as it is practical to do so.

Supervisors shall ensure that all preventive maintenance is carried out by qualified personnel based on required maintenance schedules and that records are maintained.

All workers are responsible for checking their tools and equipment they are working with. Tools or equipment that pose a hazard due to a need for repair shall be immediately tagged to avoid their accidental usage and removed from service.

All equipment brought onto worksites will meet or exceed State OSHA regulations and/or ANSI or industry standards.

### 16.2 Maintenance Program

Preventive maintenance is a schedule of planned maintenance actions aimed at the prevention of breakdowns and failures. The primary goal of preventive maintenance is to prevent the failure of equipment before it actually occurs. It is designed to preserve and enhance equipment reliability by replacing worn components before they actually fail. Preventive maintenance activities include equipment checks, partial or complete overhauls at specified periods, oil changes, lubrication and so on. In addition, equipment deterioration can be recorded and tracked; parts can then be replaced or repaired prior to causing system failure. Recent technological advances in tools for inspection and diagnosis have enabled even more accurate and effective equipment maintenance. The ideal preventive maintenance program would prevent all equipment failure before it occurs.





General Requirements for a successful maintenance program are:

- Well organized and scheduled,
- Controls hazards,
- Defines operational procedures, and
- Trains key personnel.
- General requirements for equipment maintenance include:
  - Obtaining a copy of the maintenance schedule recommended by the manufacturer;
  - Ensuring that maintenance is performed as required;
  - Ensuring that the person(s) performing the maintenance are competent (i.e. licensed mechanic);
  - Retaining records of maintenance/service conducted;
  - Specifying who is responsible for overseeing equipment maintenance and where the records are kept; and
  - Setting up a system for removal and tagging of damaged or defective tools and equipment.

In addition to ensuring that workers use the tools and equipment properly, it is vital that tools and equipment are properly inspected, maintained, and kept in good repair. The purpose of the maintenance program is to reduce the risk of injury, damage and lost production.

All tools, equipment and vehicles shall be well maintained in order to reduce the risk of incidents or injuries.

- Only properly trained workers are to use tools, equipment and vehicles.
- All tools, equipment and vehicles must be inspected prior to using.
- If applicable, maintenance schedules for all tools, equipment and vehicles are to be respected.
- If at any time an employee judges that a tool, piece of equipment or vehicle is unsafe for use, they are to properly tag the item "Out of Service," return the equipment to their supervisor and inform them of any issues.
- Tools, equipment or vehicles that are tagged "Out of Service" shall either be repaired or replaced, and management informed.

### 16.3 Maintenance Personnel Qualifications

The qualifications of The Rafter D Corporation maintenance personnel are key to the success of the maintenance program. All individuals who perform maintenance work on company tools shall have the appropriate skills, accreditation or certification and be competent in the maintenance task being performed.

This certification applies both to company employees and to contracted maintenance services.

### 16.4 Equipment Inventory

The Rafter D Corporation will be responsible for maintaining an accurate inventory list of all tools and equipment. The following is a list of sample items that could be included on the inventory list:

- ✓ Mobile Equipment – Trucks, trailers, forklifts, cranes (all types), etc.
- ✓ Fire Equipment
- ✓ Personal Protective Equipment
- ✓ Ladders
- ✓ Power Tools (Pneumatic, electric, hydraulic)



✓ Hand Tools

The list should include the make, model and serial number of each item as well as the quantity and location. An internal identification number may be necessary for some equipment.

Major equipment includes, but is not exclusive to:

- Trucks & Trailers
- Tower Cranes
- Mobile Equipment - Cranes
- Personal Protective Equipment (for example – fall protection)

The Equipment Operating Manual will specify the need for preventative maintenance as well as the required frequency of maintenance and service of this equipment. All preventative maintenance performed requires retained documentation.

### 16.5 Maintenance Records

The maintenance system shall include a records system. Part of this system shall be made up of inventories and schedules. In addition, the record system shall document what maintenance work was done, when and by whom.

Any inspection or maintenance performed on equipment must be recorded on a standardized form and logbook. Inspection forms must specify, as a minimum, the following:

- Critical parts of the equipment to be inspected
- Identified problems with any component of the equipment
- Date of the inspection
- Name/signature of the person performing the inspection
- Any service performed on critical or non-critical equipment must be recorded on a standardized form and log book, which includes as a minimum, the following:
  - Department
  - Name and serial number or identification numbers of the equipment serviced
  - Part of equipment serviced
  - Action taken
  - Date maintenance was or is being completed
  - Name/Signature of person who performed the maintenance

### Preventative Maintenance

In addition to regularly scheduled inspections and recording procedures for the service and repairs, the major equipment must also have a preventative maintenance schedule.

### 16.6 Monitoring

The monitoring functions in a maintenance program fall into two areas.

- 1) First, the personnel responsible for operating or maintaining equipment to ensure that appropriate checks and maintenance are completed.



- 2) Secondly, management should monitor the entire program to ensure that it is functioning in accordance with company policies.

### Defective Tools and Equipment

If a tool or piece of equipment is found to be faulty, a "Defective Tool Tag" must be immediately affixed to that tool or piece of equipment.

- **RED TAG - DEFECTIVE EQUIPMENT, OUT OF SERVICE**
- **GREEN TAG - SERVICED EQUIPMENT, READY FOR USE**

A defective tool tag **must not** be removed from tools or equipment by anyone except a supervisor or maintenance personnel.

"Lock-Out Procedures" must be in place for electrically energized equipment or machinery found to be defective.

- The procedures must exist in writing in the procedures section
- The lockout de-energization procedures must be understood and reviewed regularly with all affected workers
- The system must ensure that, under no circumstances can a locked-out piece of equipment or machinery be engaged
- The lockout de-energization procedure must be strictly enforced, and disciplinary action clearly understood by all affected workers
- A defective tool tag and/or lock-out mechanism must not be removed until the equipment or tool has been repaired and the service performed is documented and dated.

## 17.0 Fire Prevention

All worksite activities will be carried out in such a way so that the risk of fire is controlled as much as possible. All workers will be given adequate instruction in fire prevention and evacuation procedures applicable to their worksite.

### 17.1 Fire Protection Devices

The following is a list of fire protection devices used at the facility to control and prevent fires indicating system responsibilities and maintenance.

#### Fire Extinguishers

The local fire prevention or Fire Department must conduct an annual inspection of all facility fire extinguishers. The HSE committee should always check fire extinguisher during informal inspections. Listed below are the types of extinguishers for the different classes of fires. Workers are instructed annually on the proper use of fire extinguishers, types available and locations of equipment. Locations are marked with identification with yellow numbers.

- **Class "A"** for ordinary combustibles such as rags, wood, cloth or paper
- **Class "B"** for flammable liquids such as oil, gas, grease, etc.
- **Class "C"** for energized electrical equipment such as motors, wiring, switch plates, computers, etc.
- **Class "D"** for combustible metal including, chips, shavings, etc.

#### Smoke Detectors and Pull Stations

Local area Fire Protection must conduct annual inspections of all facility smoke and pull stations.

#### Sprinkler System



Local area Fire Protection must conduct annual inspections of the sprinkler system.

## 17.2 Fire Prevention Responsibilities

### Fire Marshal

A Fire Marshal is not there to be a hero - we do not expect them to put themselves at unreasonable risk. The Fire Marshal's role is primarily outside the building with the additional responsibility of communicating with the Fire Department to confirm any information received (especially with reference to trapped persons or the location of fire). This role is required for all main buildings as people need to be managed outside the building and prevented from re-entering (especially through back doors).

#### It is the responsibility of the Fire Marshal to:

- 1) Proceed to the congregation area and wait for the Fire Department.
- 2) Encouraging people to:
  - Move away from the building to the fire assembly points
  - Not re-enter the building until the all clear is announced
  - If necessary (for example in a major fire) to assist with clearing an assembly point for the Fire Department to access equipment such as fire hydrants. This will be undertaken under the instructions of the Fire Department.
- 3) At the end of a drill / evacuation it is the Fire Marshal that shall declare the all clear and permit persons to re-enter the building.
- 4) In the case of a fire or suspected fire only the fire department's senior officer on site can declare the all clear. Once the all clear is declared the Fire Marshal relays the information to the Fire Wardens and any persons still present to permit re-entry into the building.
- 5) In the case of a situation where the Fire Department does not permit re-entry to the building the Fire Marshal may be required to assist with securing the structure.
- 6) Providing such information as the circumstances permit to the Fire Department if there are areas, which appear not to have been vacated:
  - Noting the reporting of cleared building – or presence and location of persons remaining – provided by the Fire Wardens
  - Noting the location of any person said to be remaining in the building
  - Collating reports, from the Fire Wardens, of shortcomings in the fire safety provision (e.g. defective fire alarm sounders, areas where the alarm cannot be heard) or the conduct of the drill (e.g. use of wrong exits)
  - After a drill, or an emergency, reporting the results to the HSE committee including time taken for the drill / evacuation, any problems encountered etc.
- 7) The Fire Marshal shall co-ordinate fire drills for the building.
- 8) Will confirm head count from the wardens and report to the Fire Department upon arrival.
- 9) Maintain the list of floor evacuation routes and locations of disabled persons for the fire department.

#### Administration

- The Fire Marshals should have plans of the building, if possible showing the area covered by individual Fire Wardens
- It is intended that all Fire Wardens will be registered with the Fire Marshal



- Registration will include the following details:
  - 1) Name of Fire Warden
  - 2) Contact details of Fire Warden (including location)
  - 3) Exit / area covered by Fire Warden
- Registration will be undertaken via the Fire Marshal who will be responsible for ensuring that there are Fire Wardens for the building. It is necessary for the marshals to have deputies to cover leave or sickness.
- The HSE committee will arrange training for Fire Marshals and Wardens, which should be undertaken annually, or as new members are added.
- Fire Marshals will ideally have fluorescent jackets to aid identification at the Assembly Points. The Rafter D Corporation supplies the jackets.

### Fire Wardens

Fire Wardens are not there to be heroes - we do not expect them to put themselves at unreasonable risk. The HSE committee for various areas of the building allocates the Fire Warden role. In some cases, Fire Wardens may be appointed for areas shared between more than one department. Fire Wardens should have deputies so that absences can be covered.

#### It is the responsibility of the Fire Wardens to:

- 1) Know evacuation routes, alternate routes and congregation area.
- 2) Create a checklist of all employees in your area for quick head count.
- 3) Arrange for someone to cover for you when you are not in the building.
- 4) Assist people in evacuating and direct them to congregation area.
- 5) Check all offices and washrooms in your area and close the doors, if it is safe to do so.
- 6) Perform a head count to ensure all employees on your checklists are accounted for.
- 7) If there are extra people present, note them, and communicate this with the other Fire Wardens.
- 8) Missing people and their probable location must be reported to the fire department's senior officer. The fire director and Fire Wardens will meet outside at the entrance to the building. **NO EMPLOYEE IS PERMITTED TO ENTER THE BUILDING TO SEARCH FOR MISSING EMPLOYEES.**
- 9) Reentry is only permitted when the fire department has deemed it safe and the wardens have been notified of this.

### Administration

It is intended that all Fire Wardens will be registered with the health and safety committee. Registration will include the following details:

- Name of Warden
- Contact details of Warden (including location)
- Area covered by Warden
- Normal exit used by Warden

Registration will be undertaken via the Fire Marshal who will be responsible for ensuring that there are Fire Wardens for the departmental areas of the building. It is necessary for the Wardens to have deputies to cover absences.

### Suggested Tools:



- Hard Hats
- Florescent Vests
- Flashlights
- SDS sheets
- Updated employee listing

### First Aid Attendants

Check with the Fire Wardens to see if anyone requires first aid. A first aid kit will be available at the designated meeting area.

## 18.0 Health & Safety Program Regular Review

### 18.1 Overview

The Rafter D Corporation management will monitor the company IIPP & HSE manual on an ongoing basis and will ensure that at least annual reviews are performed. Personnel involved in the program review will be competent to do so. The review will examine all of the elements of the program to ensure that the program continues to meet regulatory and company requirements. The improvements will be the result of input from the management, joint health & safety committee and employees. Changes in work processes, best practices or the products used will be included in the program revision if there is a change in the effect of the process or product on the health and safety of any employee.

The introduction of a new product (with potential HSE hazards) shall result in a review by management to ensure all HSE safeguards are in place. Any significant change in the effects (or potential effects) of or on employees' health and safety will be encompassed in the program to ensure that employees have access to the new information.

Any major reduction of the effectiveness of the current IIPP & HSE manual will be immediately addressed.

### 18.2 Purpose of the Review

- Provide evaluation of programs
- Suggest corrections and additions as needed
- Assess accident trends
- Maintain and improve workers' awareness of the IIPP
- Reduce accidents and Workers' Compensation Insurance claims

### 18.3 Focus of the Review

- The reviews will focus on the elements of the programs contained in this manual, namely:
- Policies and administration
- HSE & IIPP education and training
- Supplementary instructions
- Supervision of workers
- Workplace inspections
- Monitoring of Roaster and hazardous conditions
- Accident investigation and follow-up



- First aid services and equipment
- Health and safety committees
- Emergency preparedness and evacuation
- Personal protective equipment
- Records and statistics
- Maintenance programs; Additional systems and programs

A report will be written which will include specific recommended actions and an action plan to achieve. The HSE committee will administer this process impartially.

### 18.4 Program Audit

The IIPP & HSE manuals shall be audited and evaluated annually. The purpose of the audit is to ensure the program is being utilized, is effective and to investigate the safety activities and performance during the previous year within the context of the IIPP. The audit will also be used to set measurable objectives and to outline specific safety activities, focal points, and revisions to procedures for the coming year.

A written report, including evaluations will be produced. Upon completion of the written report The Rafters D Corporation will:

- Develop an action plan to implement practicable recommended revisions;
- Monitor the implementation of the action plan.

## 19.0 Fleet Risk Management

### 19.1 Motor Vehicle Safety

The Rafters D Corporation believes in a fleet loss-prevention program that will reduce costs related to the purchase, maintenance and repairs of, and accidents involving, the company's vehicles and assist in reducing vehicle accidents.

#### Supervisors

Supervisors shall:

- Ensure that drivers are qualified, trained and have a valid license.
- Ensure that all workers are familiar with motor vehicle safety policies and procedures and accident/incident reporting requirements and frequently check on their compliance.
- Maintain all vehicles adequately for safe operation and ensure that only authorized personnel are allowed to operate vehicles.
- Ensure that unsafe vehicles are not driven until safety deficiencies have been corrected.
- Review each incident/accident report to determine if the worker's actions were consistent with The Rafters D Corporation's policies and procedures.
- Determine what additional training or other positive action is required to deal with driver error.
- Maintain complete records on fleet vehicle accidents/incidents.

#### Workers

- Workers driving the company's vehicles or their personal vehicle for business use must:
- Provide a copy of their current driver's license



- Operate motor vehicles in a safe and responsible manner
- Be familiar with and obey all motor vehicle safety policies and procedures, and State highway traffic rules and regulations
- Inspect the vehicle that you're about to drive and report to your supervisor, in writing, all defects noted during the trip or inspection (if any)
- Report all motor vehicle accidents/incidents immediately in accordance with the accident/incident reporting procedures
- Report immediately to the supervisor any suspension of driving privileges and cease to operate any fleet vehicle until his/her privileges are reinstated

### Seat Belt Use

The Rafter D Corporation recognizes that seat belts are extremely effective in preventing injuries and loss of life. All workers of The Rafter D Corporation must wear seat belts when operating a company-owned vehicle, or any vehicle on company premises or on company business; and all occupants are to wear seat belts when riding in a company-owned vehicle, or in a personal vehicle being used for company business.

## 19.2 Driver Records

The Rafter D Corporation is responsible for the safety of all drivers and lease operators who work for us. Our responsibility includes ensuring all our drivers are properly qualified and trained. This includes:

- Ensuring drivers are qualified to drive commercial vehicles
- Ensuring drivers are not too tired to drive
- Ensuring vehicles are safe
- Ensuring goods are properly handled
- The Rafter D Corporation is required to keep records on each of the following for every driver who works under our fleet Safety Certificate:
  - Driver licenses
  - Driver abstracts
  - Driver incident records

### Driver Licenses

Supervisors shall make sure every driver who works under their supervision has:

- A valid license that is the proper class for the vehicle they operate
- The necessary restrictions and endorsements (e.g., air brake endorsement)

## 19.3 Hours of Service Records

All operators and drivers including lease operators are required to record their "hours of service" in accordance with Federal requirements.

The State requirements will be reviewed and issued to all driving personnel during initial orientation and on a regular basis to all "existing drivers". Management, the Safety Representative and Dispatcher(s) will verbally assess each operator/drivers understanding of these requirements, on a regular basis.

The dispatcher(s) or supervisory staff will monitor and assess drivers "hours of service" on a trip-by-trip basis. Operators/drivers will be advised of their status and will adhere to the rules and regulations.





Each operator/driver is required to be aware of the “hours of service” regulations, for the area they are operating in, and must never exceed those hours. Operators/drivers who are “out of hours” and on the road must notify Dispatch or the Field Supervisor.

Our goal is to provide the safest traveling and work environment for all personnel and the general motoring public. All personnel, in co-operation with senior management and support staff, will make every effort to understand these requirements and insure all regulations are adhered to.

Failure to comply with this policy and the regulatory requirements will result in disciplinary action, including possible termination.

### General Hours of Service Rules

The following information is an interpretation of the regulations. A copy of these regulations is available at head office. Anyone unsure of the requirements should consult with management and/or the pertinent regulations.

**Note:** Whenever the term “driver” is used in the following information, it refers to company operators/drivers, Lease Operators and any other person(s) operating vehicles and/or equipment on behalf of The Rafter D Corporation.

A driver is allowed to drive:

- 13 hours, following 8 consecutive hours “off-duty”.

A driver is not allowed to drive after accumulating:

- 15 hours of “on duty” time,
- 60 hours of “on-duty” time in a period of 7 consecutive days,
- 70 hours of “on-duty” time in a period of 8 consecutive days,
- 120 hours of “on-duty” time in a period of 14 consecutive days.

**Note:** In the 120 hour / 14-day period, an operator/driver is required to have a minimum of 24 consecutive hours “off-duty” time prior to accumulating 75 hours of “on-duty” time.

### On-Duty Hours

“On-duty hours” are defined as all that period from the time an operator/driver begins to work or is required by the carrier to be ready to work until the time that an operator/driver stops work or is relieved of their job responsibilities by the carrier.

“On-duty hours” include the time spent:

- Inspecting servicing, repairing, conditioning and/or otherwise preparing the vehicle
- Driving the vehicle
- Traveling as one of two operators/drivers, except when resting in the sleeper berth
- Participating in the loading and/or unloading of the vehicle
- Inspecting, securing and/or checking the load being carried
- At the request of the carrier, waiting for the vehicle to be serviced, loaded and/or unloaded
- Waiting at customs and/or weigh station for the vehicle and/or load to be inspected
- At the request of the carrier, travel as a passenger to a work assignment that will begin before 8 consecutive hours of off-duty time had been taken
- Waiting in route due to an accident and/or other unplanned occurrence
- Performing any other work in the capacity and/or employment of a carrier.

All hours not included in the “On-duty hours” definition will be considered “off-duty” hours.



### Recording Keeping

The Rafter D Corporation policy is that a record (Log Book) is required for any trip over 100-mile radius and filled out 7 days prior to going over 100 miles. It must be in a graph format and contain the following information:

- Date, operator(s)/driver(s) name (printed)
- Name and main office address of the carrier
- Equipment number(s) – power unit and trailer(s); License plate numbers are acceptable
- Odometer reading at the start of the day and total distance each day
- Start time of work shift, including a minimum of 15 minutes for pre-trip inspection
- End time of work shift, including a minimum of 15 minutes for post-trip inspection
- Total hours in each duty status
- Operator(s)/driver(s) signature
- The graph grid format, for each daily log must be completed as follows:
  - A continuous line must be drawn between the appropriate time marks to record the periods of time:
    - Off – duty
    - Sleeper berth
    - Driving
    - On duty (not driving)
  - Record the location (by name or highway number) and the State where each change of duty status occurred.

The total hours in each duty status must be entered to the right of the graph grid and the total of such entries must be equal to 24 hours.

Whenever a time zone is crossed, the log must be prepared and maintained using the time standard in effect at the home base.

While in route, the operator/driver must:

- Carry duplicate copies of the daily log for the previous 7, 8 or 14 days (whichever cycle they are working on)

All operators/drivers are required to forward, within twenty days, the original copy of each daily log to the head office and/or principle place of business of the carrier by whom they were employed.

All daily logs and supporting documents must be retained by the carrier for a period of at least 6 months and must be readily available for inspection, upon request by an inspector.

### Time Sheets

Operators/drivers are exempt from maintaining a “graph grid” style daily log if they meet the following criteria:

- The vehicle is operated within a 100 Mile radius of where they report to work
- They return to the home base and are released from work within the 15-hour period
- An accurate record of the operators/drivers “hours of service” is maintained for a period of at least 6 months.

**Note:** The above is an exception from completing a “graph grid” style daily log but is not an exception from the “hours of service” regulations. Operators/drivers are still required to maintain a record of their daily start and end time as well as total hours for each day worked. In addition, operators/drivers must include a description of the work done each day.



Refer to the appendix pertaining to forms for a sample of the “daily time sheet”.

## 20.0 Disability (Injury/Illness) Management

### 20.1 Return to Work Program

The Rafter D Corporation recognizes that the prevention of injuries and the rehabilitation of injured and/or ill workers are equally important goals. The Rafter D Corporation further recognizes that a return to work program is part of a continuum of injury prevention and rehabilitation.

The Rafter D Corporation believes that effective reintegration of disabled workers minimizes the loss of expertise, resources and productive potential to the employer and is the best strategy for maintaining our worker’s potential and self-worth. The goal of the return to work program is to provide meaningful employment and to demonstrate a leadership role in the management of worksite disability.

The Rafter D Corporation believes in the well-being and rehabilitation of all workers that are suffering from an injury or illness that occurred on or off the job.

### 20.2 Return to Work Program Defined

A Return-to-Work Program takes each worker’s injuries and illnesses into account. Each case is considered independently, and an appropriate return-to-work plan is established. The initiation of the return-to-work process may be at the request of either the:

- Injured worker
- Workers’ Compensation Insurance staff
- Injured worker's attending physician
- The Rafter D Corporation Return to Work Coordinator
- The Rafter D Corporation promotes a safe and timely return to work by:
  - Intervening early in the process (contact must be made with the injured worker within 24 hours of receiving the report of injury)
  - Collaborating with workers and health care providers
  - Communicating a documented plan with workers and the health care providers
  - Every return-to-work plan is designed to accommodate the worker's capabilities

The Rafter D Corporation works closely with the physician and employee to assist in the planning, coordination and monitoring of the return-to-work plan. Tracking and measuring the plan helps to demonstrate the effectiveness and provides an opportunity for improvement. Close monitoring and feedback throughout the process helps with the reduction of repeat of similar injuries.

### 20.3 Mission Statement

The Rafter D Corporation recognizes the human and business benefits of a formal Return to Work Program and therefore, commits to:

- 1) Assisting in the well-being and rehabilitation of all workers that are suffering from an injury or illness that occurred on or off the job.
- 2) To ensure the trust, respect and to protect the confidentiality of the individual.
- 3) To assist in an injured or ill worker’s treatment or rehabilitation by providing transitional work that is meaningful and assists in the recovery process. This can be performed safely and effectively without undue risk of re-injury and/or undue risk to co-workers or property.



- 4) To partner with the injured or ill worker in the return-to-work process.

## 20.4 Program Scope

The Return-to-Work Program will be equally available to all workers that are permanently or temporarily disabled due to an injury or illness.

The program is available immediately post-injury and/or illness and includes immediate return to work arrangements, formal rehabilitation assistance and interventions.

The program is available throughout any periods of disability and/or illness.

## 20.5 Program Objectives

To provide a fair and consistent Return-to-Work Program that focuses on rehabilitating workers who are recovering from illness and/or injury that occurred on or off the job.

## 20.6 Program Benefits

The active involvement of workers ensures their concerns will be considered and can result in a speedier recovery, return to regular activities, both at work and at home.

The worker performing immediate or formal transitional work will receive his or her regular rate of pay, for the hours worked. Where the worker is unable to perform transitional work on a full-time basis, he or she will receive compensation both from The Rafter D Corporation for the hours worked and the insurance provider.

## 20.7 Immediate Transitional Work Defined

**The goal of immediate transitional work is to enable the worksite to be part of the worker's treatment.**

Immediate transitional work is defined as:

- 1) **Graduated Return to Work (GRTW)** – Involves staggered hours or duties, slowly increasing in frequency and duration of task requirements until the full job and tasks can be performed.
- 2) **Modified Work** - Any change in the tasks that make up a job; this may involve physical changes to the work area, changes in the equipment used or re-organization or elimination of tasks.
- 3) **Transitional Work** - Any group of tasks or specific jobs not intended as the final outcome of the worker's return to work.

The immediate transitional work options will act as a bridge to enable a worker to return to their normal duties and activities of daily living.

## 20.8 Roles and Responsibilities of Participants

Many individuals may be involved in the day-to-day administration of the return-to-work program and/or in each individual return-to-work plan. The players may change depending on the department structure, the demands of the worksite and the specific needs of the program in each case. Some of the general responsibilities of the major players within the worksite are:

### Injured Worker's Responsibilities

Most Workers' Compensation Insurance providers and many disability insurance providers expect workers to perform alternate work where it is clear that the work is safe, suitable, sustainable, meaningful and productive. Where appropriate work is declined, the providers may reduce or cease to pay benefits.

The role of an injured and/or ill worker should move beyond that of a passive receiver of treatment or assistance. The individual should be encouraged to actively participate in the return-to-work process to ensure that it is safe, suitable and sustainable.



### Employer's Responsibilities

The Rafter D Corporation is committed to the success of the return-to-work program and commits to fully participate in the program.

## 21.0 Project HSE & IIP Program

Planning and implementation of health, safety and environment are important elements to the success of any project. The following list contains examples of items that should be reviewed and produced (as required) for each project:

- Project / Site specific Work Plan incorporating requirements and timing of HSE activities
- Pre- Job Hazard Assessment
- Project Hazard Assessment
- Site Visit Report
- Emergency Response Plan
- First Aid Assessment
- Project Orientation
- Client / Project HSE requirements
- Project specific HSE procedures
- Project Risk Register
- Task Safety Analysis
- Safe Systems of Work on site, e.g. permits to work, risk assessments, record of tailboard discussion/Step Back assessment etc.
- Site specific Environmental Protection Plan
- Oil Spill Emergency Response Plan

All project personnel are required to comply with project specific HSE requirements. Please contact the Project Manager / HSE representative on the project for more information.

### Project Work Plan

The purpose of the Project HSE and Project Work Plan is to describe some of the elements associated with executing a project. The specific deliverables associated with any project are based on the nature of the project, the client requirements and the contractual requirements and project specific needs. This guideline will be followed and executed after being awarded a bid.

### Project Manager

- The Project Manager is responsible for ensuring adequate resources are made available to plan and execute HSE matters on their project.
- The Project Manager shall determine, document and communicate the project deliverables to all relevant Project personnel.
- The Project Manager shall create and assemble all relevant documents in order to properly kickoff a project. This stage requires a lot of planning and input and should not be rushed.



- The Project Manager, in consultation with his Foremen and EVP, will develop most of the content. Documents required include:
  - a) Executed Contract
  - b) Tender, Addendum and Q&A documentation and drawings
  - c) Bid documentation
  - d) Document Transmittal Log
  - e) Project Schedule
  - f) Site Specific Work Plan
  - g) Resource Plan
  - h) Key Contact Form
  - i) Master Forms Suite
  - j) Safety Manual
  - k) Project Budget

### **Site Specific Work Plan**

The Site Specific Work Plan describes the plan to complete the work. It will collaborate the construction plan to contain information such as crew and equipment required, flow of construction (from the schedule), lay down yards, First Aid stations, work methods (i.e., tension string vs. drag string), QA/QC efforts, hours of work.

It is the Project Manager responsibility to create the Site Specific Work Plan and review it with the respective stakeholders.

### **Key Contact List**

A Key Contact list must be created, which shall include not only The Rafter D Corporation personnel, but all of the emergency response personnel contacts, client, subcontractor and any other relevant contacts. It shall be displayed in a central location.

It is the Project Manager responsibility to:

- a) Create the Key Contact List.
- b) Update it as required.
- c) Display it.

### **Project Sub-Contractor Safety**

Work involving the use of subcontractors requires additional controls, including:

- Subcontractor prequalification assessment
- Clear definition of HSE requirement in subcontractor contracts
- Subcontractor Project / HSE kickoff meeting
- Daily subcontractor toolbox, weekly subcontractor HSE meetings and participation in monthly Joint Health & Safety Committees
- Subcontractor safety monitoring – HSE inspections and review of Record of Tailboard discussions
- Subcontractor HSE reporting – statistics, incident reports (including Near Hit reporting)
- Other proactive safety engagement with contractor



- Audits of subcontractor, and their subcontractors.

All project personnel are required to comply with project specific HSE requirements. Please contact the Project Manager / HSE representative on the project for more information.

### **Pre-Job Hazard Assessment**

The Pre-Job Hazard Assessment is a two-part process conducted during a visit to the site and the nearest town/city.

Part One: Depending on the size of the project and the distance covered this may be a short half day process or it may be a day or longer. A detailed list of hazardous points is covered, and special hazards are noted.

Part Two: This is a visit to the nearest town/city. This visit is to determine the emergency response capabilities of the community should an accident at the worksite occur. This also serves to advise these agencies that we will be in town and the type of work we will be doing.

### **Recurring Hazards / Control List**

This is a detailed list of hazards developed from the Pre-Job Hazard Assessment. These are hazards that are “the same” (relatively speaking) on each project but the controls may differ somewhat from project to project. The list includes the hazard, the controls for the hazard, and then who is responsible for implementing the controls for that hazard. If a Project Risk Register exists, this information is incorporated into the Risk Register.

### **Project Specific Hazards / Control List**

This is a detailed list of the special hazards related to the work methods used to complete the project. It is constructed with a journeyman lineman advising so that no hazards are missed. If a Project Risk Register exists, this information is incorporated into the Risk Register.

### **Emergency Response Plan**

The Emergency Response Plan (ERP) includes all of the critical information one may need during an emergency. This includes phone numbers of critical people, locations and phone numbers for emergency agencies (i.e.: hospitals), maps to emergency facilities, locations of special areas of the project. (i.e.: the yard(s) fly points, Hwy crossings, etc.)

In addition to the above, the ERP includes detailed procedures on what to do for Fire, First Aid, Spills, etc. The step-by-step instructions need easy to follow in an emergency when emotions are high.

### **First Aid Assessment**

This assessment is conducted as part of the Pre-Job Hazard Assessment Process and depends on the location of the site and the hazards of the work. Both of which will determine the first aid requirements for the project. If the project has a size of 50 or more employees, then a dedicated first aid person may be required. The HSE Manager will make this determination for the project at that time and put in place necessary personal.

### **Project Orientation**

Orientating our employees, subcontractors, and vendors on specific project requirements before commencing work will result in a safer, better educated, and more organized project. A proper Project Orientation will require effort from Project Management, HR, HSE, and Fleet.

The Orientation curriculum for each project will be different, but should include the following minimum requirements:



- Introductions & Welcome
- Corporate Component
- General company background and history
- Important resources (HR, Safety, Fleet)
- Expectations of PPE, professionalism, quality
- How we want to be perceived and the image we want to project
- Company Values
- Scope of Work
  - What are we here to do and what the end result should be
- Project overview
  - The “what” of the project
  - Tailboards & step backs
  - Office & Yard Setup applicable to jobsite
  - Review Schedule & Maps
  - Hours of work
- Project Safety
  - Review of Pre-job Hazard Assessment
  - Review of Project Hazard Assessment
  - Review of Emergency Response Plan
- Site Specific Work Plan
  - The “How” we will do it
  - Subcontractor’s we’ve hired
  - Other projects in the area
- Schedule
  - The “When” it will happen
- Key Contacts
  - Who to contact for what (Organization chart for the project)
- Sign off to confirm understanding of orientation

## 22.0 Use of Subcontractors

The Rafter D Corporation will review all relevant HSE & IIPP related data including as part of the process for the selection on sub-contractors. Sub-contractors with statistics that are outside of the industry average are not to be contracted except in exceptional circumstances and then only after certain assurances are secured and obtained to ensure the health and safety of all personnel.

Subcontractors are required to comply with all relevant health and safety practices and procedures in order to maintain all areas under their respective control, to achieve a safe place for their employees and for others who are present.

For more information, refer to the **Standard, Subcontractor Safety** for use of Subcontractors.





## 23.0 Health & Safety Manual Review Log

Date	Section	Comments	Reviewed by:
February 2018		Initial Creation	Jody Rose, HSE
February 2018		Approval	Dean Gainor, President