Nahanni Safety Management Plan

Project Name: AVEN Pavilion

1. Contract Details

Contractor name: Nahanni Construction Ltd.
Contractor address: 100 Nahanni drive, Yellowknife  Phone: -867-873-2975
Contractor Safety representative: Gord Peckford
Contract description: Drill and Blast operations
Location of works: AVENS – A Community for Seniors - Yellowknife
Project Officer: Kenny Ruptash

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2. Safety Policy

Nahanni Construction Safety Policy

Nahanni Construction is committed to being a leader in health and safety by achieving injury-free workplaces. We affirm that:

- We hold health and safety among our **highest values**.
- Health and safety are **everyone**'s responsibility.
- All accidents and injuries are **preventable**.
- Health and safety measures are **key indicators** of organizational excellence.
- Attaining safe lifestyles with our employees creates a **competitive advantage**.

In fulfilling this commitment, we must consider health and safety in every decision we make and in every activity we perform. Management is committed to provide a safe and healthy work environment.

Nahanni Construction recognizes the right of all workers to work in a safe and healthy work environment. A safe and accident-free work place can be controlled through good management and spirited consultation and cooperation with employee involvement. Safety is the direct responsibility of all managers, supervisors and employees.

All management and supervision within Nahanni Construction Ltd. are responsible for the development and endorsement of health and safety policies. Employees shall perform their jobs properly in accordance with Nahanni Construction Ltd Health and Safety Policies in conjunction with Territorial and Federal laws and legislation.

This policy is applicable to all Nahanni Construction Ltd. locations, operations & sections in this Health & Safety Manual.

3. Responsibilities

Managers will:

Manager’s roles and responsibilities for Health and Safety

i. Provide a statement of policy relating to the Safety Program. The statement provides a commitment that sets levels of expectations for Safety Performance throughout the corporation.

ii. Provide a minimum of 1 first aid trained person for every 10 (surface) 1 first aid trained person for every 5 (underground) workers, in accordance with NT regulations #8.51

iii. Ensure all established safety policies are administered and enforced in all areas.

iv. Ensure that all field operations personnel are aware of and effectively practice the policies and procedures set out in the Safety Program.

v. Researching, evaluating and selecting medical facilities to accommodate the project medical and testing facilities.

vi. Coordinating and maintaining worker HS&E training programs and to ensure appropriate training is made available.

vii. Providing directions to supervisory personnel in developing and implementing Safe Work
Practices and Job Procedures.

viii. Issuing and circulating safety literature to enhance and maintain safety awareness.

ix. Review minutes of weekly safety meetings to verify that meaningful direction is provided to workers.

x. Monitor Company owned and rented equipment safety maintenance programs.

xi. Review accident/incident reports to verify corrective action has been taken.

Superintendents will:

Superintendent’s roles and responsibilities for Health and Safety

i. Ensure implementations and maintenance of the established safety policies on specific projects within their respective areas of jurisdiction.

ii. Ensure the maintenance of the highest standards of performance with respect to the Safety Program on the respective job-sites and will be accountable for the safe performance of personnel and equipment on their projects.

iii. Implement a site Safety Program and develop a clear understanding of safety responsibilities and specific duties for each supervisor or supervisor. The Superintendent is expected to be knowledgeable of and responsible for complying with all regulations, laws and codes.

iv. Hold Safety meetings with the foremen to review safety conditions and general Safety Policies; ensure that sub-trades and foremen conduct Safety meetings, however, where there are only a few employees, the superintendent will conduct safety meetings with all project personnel in attendance.

v. Arrange for the recording of minutes of Safety Committee meetings and forward copies to the manager and post on the bulletin board.

vi. Make daily observations of safety activities on the project.

vii. Accompany the government Occupational Health and Safety (OH &S.) inspector during project inspection. When the Superintendent is not available, he/she will assign another supervisor for the inspection.

viii. Be aware of the hazards that exist for the short term. Temporary and new hire workers. Ensure that new hires receive detailed safety instructions before they are allowed to start work. New employees should be assigned to work with other employees who are familiar with the project and are aware of any specific safety rules and regulations that are in force.

ix. Formulate a detailed hiring route for all employees, which include a review of the project safety rules and regulations prior to starting work. (New Hire Orientation)

x. Enforce all established safety regulations and work methods. Take disciplinary action as necessary to ensure compliance with the rules.

xi. Provide safety meetings with his/her crew and record minutes on the prescribe form.

xii. Provide a regular inspection for unsafe practices and conditions, and ensure prompt corrective action to eliminate causes of accidents.

xiii. Ensuring that a qualified worker, supervisor or supervisor is designated to work with any new worker until the workers competence is demonstrated.

xiv. Report any and all serious accidents / near misses to the head office as soon as possible as per legislated requirements.

xv. Investigate all serious accidents, work refusals or near misses with the potential for serious
loss. Investigations may also include harassment allegations.

xvi. Detecting troubled workers and taking steps to intervene.

xvii. Demonstrate a visible and professional HS&E leadership role at all times.

Safety Officer Will:

The safety officer is responsible to ensure that all safety responsibilities are being followed by all workers. Promotes safety by example, as well as by completing safety observations and correcting unsafe practices. The safety officer reports directly to the site manager and works closely with site superintendents and supervisors.

Responsibilities include:

- Main communication link between their department and Site superintendent and Project Manager.
- Facilitate daily toolbox meetings
- Review daily work to be assigned to workers to ensure full JHA requirements
- Review all worker completed JHA prior to work being started
- Develop SOP from completed and approved JHA when required
- Circulate all material received from Yellowknife when required.
- Inspect all work areas on a daily basis.
- Complete one daily safety observation and report findings to site manager and copies to Yellowknife EH&S office.
- Respond immediately to all unsafe conditions.
- Control of and distribution of all worker personal protective equipment.
- Complete any duties, which may be assigned by clients. These may include water testing, monitoring of client equipment, etc.
- Ensure deficiencies are corrected and reported to site manager.
- Accompany all inspectors from outside agencies (INAC, PWC, WSCC, HRSDC, etc.).
- Keep manager informed at all times.
- Complete all incident/Non-conformance reports as required
- Complete all orientation of all new or transferred employees.
- Ensure that all required training is given or made available to all employees.
- Ensure that all employee files are kept current.
- Enter all training received into training log and forward to EH&S department in Yellowknife.

- Employee files will contain the following:
  - Record of orientation
  - Medical acknowledgement
  - Drug and alcohol acknowledgement
- TDG and WHMIS certificates
- Disciplinary acknowledgements
- Driver’s permit (copy)
- Any trade or safety certificates

**Supervisors will:**
Supervisor’s roles and responsibilities for Health and Safety

- Report directly to the project superintended.
- Working directly with all workers to find all possible hazards on the job site and develop actions plans to perform the work safely.
- Be familiar with the Nahanni Construction’s HS&E program.
- Coaching workers on Nahanni Construction standards.
- Holding daily toolbox meetings with the crew and recording the meeting minutes in the tool box attendance sheet.
- Communicating potential hazards and required controls that pertain to the daily work to each worker.
- Ongoing inspections of work areas and implementing prompt corrective actions for controlling any unsafe act or condition.
- Conducting accident/incident investigations on any undesired events that results in injury, refusal to work or any near miss with the potential to cause serious loss. Investigations may also include harassment allegations.
- Ensuring safety equipment and protective devices are provided and used for each task.
- Observing new hire worker performances to ensure workers are able to perform assigned duties safely. To ensure direct supervision is provided until an acceptable level of competence is observed.
- Ensuring that ANY and ALL injured workers (regardless of the severity of the injury) are escorted to the appropriate first aid or medical facilities.
- Ensure established housekeeping standards are maintained
- Providing ongoing safety orientation and instructions to new or transferred workers.
- Monitor project conditions for hazards and to immediately stop work when any hazard threatens to compromise safety of the workers, sub-contractors or clients.
- Detecting troubled workers and taking steps to intervene.
- Provide a visible and professional leadership role in the ongoing HS&E efforts.

**Employees will:**
Workers roles and responsibilities for Health and Safety

- Carry out their work in a manner that will not create a hazard to the health and safety of self or other employees.
- Have the right to refuse unsafe work and report all job specific hazards to their supervisor.
- Take care, an active role in the elimination and control of work place hazards.
- Assist site supervisors in reducing and controlling accident producing conditions and unsafe acts on the work sites.
Report any accidents/incidents, near misses and/or injuries immediately to the supervisor. Report any anticipated loss of work time to the supervisor/foreman as soon as possible after being treated by a physician following injury. Attend morning toolbox meetings and playing an active role in the meeting in discussing possible job site hazards. Providing suggestions to improve the overall health and safety program. Using all safe guards and safety equipment provided. Participating as required, in accident/incident investigations and assisting in the completing of the accident/incident forms. Ensure co-workers are advised of unsafe conditions or acts that may cause injury or illness. Demonstrate a professional attitude towards all projects HS&E efforts.

**Administration staff will:**

Administrator’s roles and responsibilities for Health and Safety

- Ensure daily administration of Safety Program on site.
- Post all safety bulletins, safety posters and safety rules and regulations.
- Assist the project superintendent(s) in accident investigations, analysis and preparation of accident reports and summaries.
- Ensure that pertinent safety reports are submitted as required.
- Prepare descriptions of identified unsafe conditions and the steps taken to correct these conditions.
- Maintain a list of safety equipment purchased.
- Prepare a copy of inspection reports on equipment.
- Prepare a copy of field Safety Inspection check lists.
- Ensure that corrective action has been taken whenever deficiencies are identified.
- Assist with safety seminars or training
- Establish schedules of inspection.
- Review the accident reports to keep informed about the project and company safety performance.
- Refusing any assigned work that he/she believes is unsafe or poses a risk to health or safety.
- Immediately report any hazardous conditions, unsafe practices, accidents
- Attend toolbox safety meetings and taking an active role in accident prevention.

On projects where a safety administrator has not been assigned, the duties described above become part of the superintendent's duties.

**First Aid Personnel**

First aid personnel’s roles and responsibilities for Health and Safety

For all jobs, the Superintendent will appoint adequate person(s) to provide first aid services as may be
required, given the nature of the job-site and government regulations. The person(s) appointed to this position shall possess appropriate certificates in First Aid in accordance with the relevant Occupational Health and Safety Act (see Appendix D) and must be available at all times to administer first aid.

First Aid Personnel will:

- Reports directly to the Superintendent
- Administer first aid as required.
- Maintain a first aid log.
- Requisition all first aid supplies and equipment.
- Maintain relations with physicians, WSCC (Workers Safety & Compensation Committee), ambulance services and hospitals.
- Coordinate the transportation of injured employees to a physician’s office or hospital.
- Assist the Safety Officer when necessary.
- Provide health, education, materials or instructions to all on-site employees as required.

4. Scope and Construction Activity Details

<table>
<thead>
<tr>
<th>List Major activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drill and blast for drainage and foundation</td>
</tr>
<tr>
<td>Remove blast rock form site using an excavator and tandem dump trucks</td>
</tr>
</tbody>
</table>

5. Risk Management

Hazards can exist in many forms: they can be visible or hidden, a condition or act. Recognition and control of hazards are necessary to ensure that corrective actions are completed on a timely basis. It is through the control of hazards that the following can be accomplished:

- Reduced frequency and severity of accidents
- Reduced financial costs
- Reduced human suffering

"Hazards Recognition and Control" involves:

- Determining what hazards are present in the workplace
- Assessing the level of risk for the hazards identified
- Implementing strategies to eliminate or reduce the risk involved; and monitoring the follow up to ensure the control strategies chosen are implemented
Types of hazards that may be considered:

- Chemical - chemical agents in the form of vapors, gases, fumes and mists.
- Physical - noise, vibration, hot or cold extreme.
- Ergonomic - awkward posture, poor tool design, manual material handling;
- Biological - bacteria, viruses, fungi.

**Hazard Assessment:** A thorough examination of an operation (job site, shop, etc.) for the purpose of identifying what actual and potential hazards exist. A hazard assessment is conducted with the direct involvement of the manager when starting a safety program. It should also be conducted prior to setting up a new job site. In addition to inspections, some organizations do formal hazard assessments regularly.

**Incident:** Any unplanned and unwanted event, which results in damage or injury, or which could have resulted in damage or injury (i.e. close calls/near misses).

**Inspection:** An observational tour of the workplace for the specific purpose of identifying unsafe acts or unsafe conditions, and for determining the levels of compliance with established Safe Work Practices, Procedures and Safety Rules. Once a job is underway, inspections are conducted on an ongoing basis to maintain the effectiveness of a safety program. (Inspections are discussed further in Section 8).

**Audit:** A comprehensive examination and evaluation of the organization's Health and Safety Management System (safety program). An audit is conducted by a trained safety auditor either from within the organization or from outside.

**Project Hazard Assessment**

Project hazard assessment begins at the estimating stage and ends with project completion. The initial project hazard assessment is essential to ensure that the risk is identified and Project Specific Safety Program is developed prior to mobilizing to site. The following should be considered when performing this hazard assessment.

- Engineered plans and drawings for project.
- Complexity of project. (New or existing facility)
- Regional weather conditions, both normal and extreme conditions such as temperature extremes, high winds, flooding.
- Access to project and mode of travel.
- Nearest hospital or clinic location, emergency response (ambulance, fire and police)
- Any special safety requirements.
- Equipment that is needed throughout the project (loader, cranes, man lifts)
- Environmental risks (proximity to waterways, tundra, wildlife)
- Expertise of available subcontractor services.
- Utilities (gas, electrical, sewers and drains)

**Hazards - General**

No substance, likely to cause injury or adverse health effects, shall be brought onto, or manufactured on-site, unless a detailed written procedure for the safe use, handling, storage, and disposal of the product has been developed and all workers, who are likely to come in contact with this substance, have been properly informed and trained in this procedure.

Documented proof of training shall be submitted to the Project Safety Manager.

**Housekeeping**

Good housekeeping procedures shall be practiced at all times. Housekeeping is one of the most important considerations on a construction site. A well-organized, uncluttered construction site reduces the risk of accidents and increases the efficiency of the workers. It is not attained by special clean ups. It is a continuous process in which everyone must participate throughout the day.

Employees are responsible for the maintenance of good housekeeping in their work areas. Poor housekeeping is a proven factor in many industrial accidents and injuries.

To maintain good housekeeping practices, the following rules shall be followed:

a) Workers shall keep their work areas clean and tidy at all times. A daily cleanup is mandatory and frequent clean-up during the day is generally necessary.

b) Work areas and storage areas shall be arranged to allow for the safe movement of workers, equipment and materials.

c) Aisles and passageways in work and storage areas shall be clearly marked by painted lines or other similar means. Such markings shall be maintained in a clearly visible condition.

d) Free access, clear of all obstructions, shall be maintained at all times to all exits, fire alarm boxes, fire extinguishing equipment, emergency telephones, and any other emergency equipment.

e) Every effort shall be made to keep floors clear of oil, grease and other materials which create a slipping hazard. Where not possible, a non-slip material shall be applied over the spill area.

f) Aisles and passageways shall be kept clear of debris and material which could create a tripping hazard.

g) Refuse containers, of sufficient size, shall be maintained by each contractor in each major area. Containers shall be emptied at regular intervals to prevent hazardous accumulation of rubbish and waste.

h) Oily rags shall be deposited in approved receptacles only.

i) Hoses, cables, ropes, wires, etc. shall not be laid on the floor across aisles and passageways and shall be recoiled after use.
j) Welding electrode stubs shall not be deposited on the floor or ground. Each welder shall be provided with a container for depositing welding stubs.
k) Heavy articles shall not be stored on high shelves. Only the bottom two shelves of racks should be used for heavy items. (NOTE: The loading capacity should be marked on all shelving).
l) Lumber with protruding nails shall not be left around work areas. Protruding nails shall be removed or clinched over.
m) Empty aerosol cans shall be disposed of in the proper waste receptacles. Aerosol cans are dangerous at temperatures over 120F (48C).
n) Spent cartridges from explosive actuated tools shall be stored in metal containers and disposed of in a safe manner.

Housekeeping shall be included on the checklist used by the contractor for his regular site inspections.

**Conducting a Hazard Assessment**

When conducting a hazard assessment, managers/supervisors will:

- Assemble the people that will be involved.
- Discuss possible hazards with employees.
- Tour the entire operation.
- Look for possible hazards originating from environment, material, equipment and people.
- Keep asking "What if?"
- Mark on the check list all items that need attention (See Appendix C - Forms).
- Review the findings with supervisors / workers and solicit their input for control measures.
- Indicate if corrective action is required.
- Take corrective action and make recommendations for the control of hazards (i.e. Safe Work Practices, and Safe Job Procedures, Rules, Administrative and Engineering Controls, and Personal Protective Equipment, etc.).
- Monitor and follow up to ensure corrective action is taken.

**Strategies for Controlling Hazards**

Managers/Supervisors will:

- Eliminate the hazards or install hazard control measures.
- Recognize and evaluate the risks associated with hazards in the workplace.
- Consider the options of:
  - Elimination
  - Substitution
  - Administrative Controls
  - Engineering Controls

6. **Hazard & Risk control register**
All residents of on YACCS property shall be notified of drill mobilization, hours of work and blast times (blast times will be coordinated with residents daily activities)
JHA’s shall be performed for each task
Drill and blast crew shall follow Break-Away Drilling & Blasting’s SOP’s

7. **First Aid and Injury Management**

   **Emergency Procedures**

1. Render first aid immediately, first aid kits are available in all vehicles and job shacks. All serious first aid injuries should be attended to by a trained first aid attendant only. We strive to keep all supervisors certified in first aid.

2. For all serious injuries, these general directions should be followed:
   - If you do not have first aid training send or locate a trained first aid attendant immediately
   - Apply artificial respiration if the patient is not breathing (by trained first aid attendants only)
   - Stop any severe bleeding, by applying pressure to the immediate wound area
   - Send someone for a doctor
   - Keep victim lying down: never move injured personnel unless the potential for further injury is immediately present

3. Stay calm. If the patient is breathing and no artery is spurting blood, giving first aid is usually unnecessary, and is often harmful

4. Do not attempt to remove foreign objects from eyes or any other part of the body or allow anyone else to do so, except a first aid attendant or a doctor

5. Call for assistance; be ready to give the following information:
   - Accurate directions to the location of the injured person.
   - Nature of the injury.
   - Any assistance that may be required.
   - Give information slowly and clearly.
   - Report back to the scene of the accident; report to the superintendent or first aid attendant that help is on the way.

   If no one can be contacted at the office call Local Emergency Service: (867)873-2222 and be prepared to give the same information as in (5). Inform operator which of the following is required:

   a. Ambulance or helicopter.
   b. Police.
   c. Fire Department.
   d. Electrical Power Company.
   e. Gas utility company.
   f. Hospital.

   Restrict the immediate area of the accident, see if further danger exists; clear the area.
8. Emergency Procedures

Emergency Response Policy

Supervisors have the accountability for emergency preparedness to ensure that emergency responses plans are in place, and that the appropriate resources are available to handle emergency situations at the workplace.

The supervisor is responsible to implement the emergency response plan, confirm that all personnel are familiar with the plan, and test the plan to assess its effectiveness.

The supervisor will gather pertinent emergency information such as the location of the nearest hospital, fire station, and first aid station, etc. to minimize travel time to treatment for all employees.

It is company policy that all workers are to be aware of the location of the action required in the emergency response plans, but in the event of an emergency, they should follow the instructions of the Manager/Supervisor.

It is company policy that requires all emergency response plans to be tested (mock drill or review during a safety meeting) at a minimum of once annually. Identified deficiencies in the emergency response plans will be rectified immediately upon discovery.

Policy for Fire Prevention

It is the policy of Nahanni Construction Ltd. To ensure the safety of its personnel and to ensure that all damage is held under control through an effective fire protection and prevention program.

It is understood that control of fire is of great concern, due to injury, damage, financial loss, work loss and loss of reputation.

It is the policy of Nahanni Construction Ltd. to ensure that all personnel are trained to handle and respond to all fires in the correct manner. It is the belief of this Company that the best way to fight a fire is to ensure that fire does not have a place to start.

Personnel Procedures and Responsibilities

It is everyone's responsibility to ensure that all hazardous flammable material is cleaned up and/or put away. Fire concerns will be high-profile throughout all inspections, (formal and informal), training, meetings, procedures, and with all emergency preparedness.
SAMPLE EMERGENCY EVACUATION PROCEDURES

Prepared by:___________________________________________________________

Date prepared:________________________________________________________

Date Revised:__________________________________________________________

Tools/Equipment Required: Aerosol-Powered Horn

__________________________________________________________

Material Required:____________________________________________________

Personal Protective Equipment:__________________________________________

__________________________________________________________

STEPS

1 Evacuation procedures shall be initiated by the Industrial First Aid Attendant or the Site Superintendent only.
2 The person instigating the site evacuation shall instruct that the aerosol-powered horn be sounded in three (3) sharp blasts, followed by a five (5) second delay, then three (3) more sharp blasts. This shall be repeated several times to ensure that all workers on site have heard the signal. This person having evacuated the site shall ensure that the proper rescue organization is notified.

3 ALL workers are to leave the site upon hearing the evacuation signal

4 Trades are to determine a designated meeting spot for an evacuation

5 Each trade shall appoint one individual who will be responsible for taking a roll call following the evacuation to ensure that all their workers are accounted for

6 Each trade shall report to the superintendent the results of the roll call

7 The Industrial First Aid Attendant, in conjunction with the Superintendent shall determine if the site is safe to reoccupy following an evacuation. No one is to enter the site without authorization.

PLEASE POST

9. Environment and Public Protection

WASTE MANAGEMENT AND THE ENVIRONMENT
Policy

1 The proper safeguard of our environment and the public is important to Nahanni Construction Ltd.

2 While doing our work, we shall consider the appropriate protection of humans, animals, plant life, air, water and soil.

3 We expect all personnel to do their best to prevent harm to the environment.

4 Our goals on the job can be met without risking harm to the environment.

5 We shall use, store and dispose of products in such a manner that will provide appropriate protection to the environment.

6 Management will adhere to good environmental standards in accordance with relevant legislation.

7 Workers will be kept informed on how to do their jobs in such a manner as to cause minimum environmental harm and waste of materials.

8 Where possible, we shall recycle and promote the use of recycled products.
10. Site Rules

Company Rules

1. Loss-Type and No-Loss incidents or injuries, regardless of their nature, shall be promptly reported to supervisors.
2. Approved hard hats shall be worn on the job by all personnel.
3. Clothing shall be appropriate to duties being performed. Long pants, a shirt and sturdy work shoes are the minimum requirements. No tank tops or tennis shoes.
4. Smoking is permitted only in designated areas. “Strike anywhere” matches are prohibited.
5. Running is not permitted anywhere, except in the case of extreme emergency.
6. Safety glasses, goggles or face shields shall be worn when concrete breaking, metal chopping, welding, grinding and for other operations require eye protection.
7. Hand tools shall not be used for any purpose other than that intended. All damaged or worn parts shall be promptly or replaced.
8. Power tools shall be operated only by authorized personnel, with guards furnished by the manufacturer “in place”.
9. All electrical hand tools shall be grounded or double-insulated.
10. Explosive/powder-actuated tools shall be used only by persons who have been instructed and trained in their safe use.
11. Compressed gas cylinders shall be secured in upright position.
12. Riding on any hook, hoist or other material-handling equipment which is used strictly for handling material and not specifically designed to carry riders is prohibited.
13. Welding and burning operations shall be carried out only by authorized personnel with appropriate individual protective equipment.
14. Horseplay, fighting, gambling, and possession of firearms are strictly forbidden on the job and constitute grounds for dismissal.
15. Possession or use on the job of intoxicating beverages or unauthorized drugs is strictly forbidden and constitutes grounds for dismissal.

Accidents, Near-Misses and Injuries

Report all injuries immediately (including minor injuries, bruises and strains) and obtain first aid for them. Injuries should be reported to your immediate supervisor, who will arrange for necessary first aid. All injuries must be reported to the office. If any leave from work is required due to the injury, or a doctor’s appointment is necessary you must report to the office to fill out the required WSCC forms as soon as possible following the accident.

Accidents where no injuries occur, but may have (i.e. near miss) or where there is damage to
equipment or material, must be reported to your supervisor. This is to enable the situation to be assessed with the objective of preventing future similar occurrences and accidents. All incidents will be reviewed at month end safety meetings.

Document all factors and events leading up to the accident including

- Time of accident
- Cause of accident
- Obtain statements directly from witnesses
- Extent of injury and damage
- Contact supervisor at head office ASAP

Workplace On-Site and Behavioural Rules

- Every worker shall keep his/her work area neat, clean and orderly
- Consuming or being in possession of or under the influence of alcohol or illegal drugs on company premises, or on any company job site, is prohibited and disciplinary action will be taken.
- Fighting, horseplay, practical jokes or otherwise interfering with other workers is prohibited. Disciplinary action will be taken.
- Theft, vandalism or any other abuse or misuse of company property is prohibited and may be cause for immediate dismissal.
- Smoking is permitted only in designated areas. "Strike Anywhere" matches are prohibited
- Running is not permitted anywhere, except in the case of extreme emergency.
- Riding on any hook, hoist or other material handling equipment which is used strictly for handling material and not specifically designated to carry riders is prohibited.

Protective Equipment

- Hard hats are to be worn as per the Occupational Health and Safety Act.
- Steel toed boots are to be worn at all times during working hours. Clothing shall be appropriate to duties being performed.
- Long pants, a shirt and sturdy work shoes are the minimum requirements. No tank tops or tennis shoes.
- Safety glasses, goggles or face shields shall be worn when concrete breaking, metal chipping, welding, grinding and for other operations which require eye protection.
- Safety glasses and vests may be needed as required by project conditions.

Nahanni Construction Ltd. Company Vehicles

A valid driver's license is mandatory for anyone operating a company vehicle. Failure to comply with this regulation may be grounds for immediate dismissal. Driver abstract checks will be made randomly to ensure compliance.

Anyone in possession or under the influence of alcohol or illegal drugs while operating a Nahanni Construction vehicle may be terminated.

Always ensure that the vehicle you are operating is clean and in proper driving condition. Items such as brakes, steering and lights must be in good working order. Perform a walk around inspection, prior to driving and check all fluids.
Drive with headlights and seatbelts on at all times.

Be sure a valid registration and pink card are in vehicles at all times. Make sure you have your driver's license with you when driving.

All federal, territorial/provincial and construction site traffic regulations must be obeyed when operating Nahanni Construction Ltd. vehicles. Any abuse of these regulations may result in termination.

Only Nahanni Construction Ltd. employees shall operate company vehicles; the exception is an emergency situation.

11. Incident reporting and investigation

Accident / Incident Reporting & Investigation Policy

Purpose

To investigate accidents/incidents so that causes can be determined and corrective actions can be implemented to prevent recurrence.

Policy

Nahanni Construction, will fully investigate the following types of accidents/incidents:

Accidents/incidents that result in injuries requiring medical aid

1. Accidents/incidents that have the potential to result in (1) above
2. All accidents/incidents that, by regulation, must be reported to OH&S, WSCC, or other regulatory agencies.

Responsibilities

1. All employees will report all accidents/incidents to their immediate supervisor.
2. Supervisors will conduct initial investigations and submit the report to their superintendent promptly.
3. Superintendents will determine the need for and, if necessary, direct detailed investigations. They will also determine causes, recommend corrective action, and report to the manager.
4. The manager will review all superintendents' reports, determine corrective action to be taken, and insure that such action is implemented.
Accident/incident Reporting and Investigation

1 Reporting

All work-related accidents, injuries, and diseases will be reported to the employer and where available to the first aid attendant immediately after the occurrence.

In some areas, certain types of accidents and incidents must be reported immediately to the government department or body responsible for industrial health and safety. Consult the local regulations.

In order to assess the effectiveness of their Accident Prevention Program, each contractor will issue, weekly, a line graph with time as the x-axis and lost time frequency is calculated as follows:

\[
\text{No. of lost time accidents} \times 200,000 \\
\text{No. of man hours worked}
\]

A lost time accident is defined as an accident in which a worker sustains a disabling injury which prevents them from attending work on the following work day.

Companies of the graphs will be submitted to the Project Safety Manager and posted on the employees' notice board.

The Project Safety manager will issue, on a weekly basis, a summary of the First Aid visits.

The summary will be broken down by Major Area, and type of injury. A copy of the summary will be forwarded to each contractor on site and also posted on the Safety Notice Board.

2 Investigation

The following accidents/incidents will be investigated by the employer, immediately after the occurrence, and a written report will be issued:

- Accident causing death or injury requiring medical aid by registered doctor
- Failure of the hoisting device
- Structural failure of a permanent or temporary structure
- Contact with overhead or underground power lines
- Contact with underground pipelines causing breakage or release of contents
- Blasting accidents
- Inadvertent exposure to harmful concentrations of hazardous materials
- Failure of a confined space entry procedure
- Failure of a lockout procedure
- Property damage in excess of $10,000
- A near miss which had the potential for causing serious injury or property damage.

Where corrective action is recommended in the investigation report, a follow-up report will be issued, within 7 days, detailing the steps taken to prevent a recurrence.

A copy of all reports will be issued to the Government department or body responsible for Industrial Health and Safety and to the Project Safety Manager.
12. Specialised Work or Licensing

WSCC letter of good standing and insurance policies is required for Nahanni and all its sub-contractors before work to commence.

13. Induction Requirements

Training and Safety Meetings Policy

Purpose:
The purpose of this policy is to provide for general and specialized safety and related training throughout all levels of the organization.

Policy:
Nahanni Construction Ltd. will provide, and employees will participate in all safety and related training that is necessary to minimize losses of human and physical resources of the company.

This training will include, but not be limited to:
- New hire and sub-contractor site safety orientation
- Daily tool box meetings
- Job-specific training
- Safety training for supervisors and management
- Task and trade-specific training and certification
- Specialized safety and related training, (Fall arrest, aerial lifts platforms)

14. Safety Monitoring

Inspections and Audits

1 Inspections by the contractor

Each contractor will conduct regular safety inspections of his/her work area(s). The Frequency will be:

- Worksites: Weekly
- Head Office: bi-monthly

The inspection will be conducted by at least one manager and one worker representative. Where feasible, these should be members of the Industrial Health and Safety Committee. (A Nahanni Construction management representative may, on occasion, accompany the inspection group, as an observer).

2 Objectives
The objectives of the inspection are to:

- a. Identify and recognize those activities being performed safely
- b. Identify unsafe conditions or practices, if the unsafe condition or practice could lead to serious injury or property loss, the work will be stopped immediately and corrective action taken
- c. Identify potential problems
- d. Identify equipment safety deficiencies
- e. Confirm employee compliance with the site rules and regulations. Personnel noncompliance notices will be issued in accordance with the Contractor's Compliance procedures
- f. Confirm completion of previously recommended remedial action
- g. Provide an ongoing appraisal of effectiveness of the contractor's health and safety program.

Each contractor will prepare a check list, appropriate to the type of work being done, which will be used, as a guideline, by the inspection team. A rating system will be used for progress monitoring. When appropriate, the check list will include, but not be limited to, the following:

i. Equipment and Rigging

- Maintenance of crane log books
- Ready availability of crane load charts and indicators
- Engineering of heavy or difficult lifts
- Functioning of warning and safety devices
- Equipment set up (outriggers firmly supported and protected from damage by passing traffic)
- Good operator visibility (no cracked or dirty windows)
- Use of spotters where required for coordination between cranes
- Communication system between an operator and riggers
- Seat belt availability and use
- Exhaust fume and noise control
- Condition of welding machines
- A qualified electrician will also conduct regular inspections of electrical equipment

ii. Power Tools

- Condition of power tools and electrical cords, a qualified electrician will also conduct inspections of electrical equipment
- Equipment guards
- Use of Personal protection Equipment suitable for the tool
- Restraining of air hose couplings

iii. Work Areas

- Lighting to Industrial Health and Safety Standards
- Clean up
- Maintenance of refuse containers
• Access to work areas (no equipment or cables/hoses across walkways
• Access to exits
• Access to emergency equipment
• Access to emergency telephones and alarm systems
• Handrails
• Hole covers
• Burning and welding screens and blankets
• Signposting and barricading of hoisting areas
• Shoring or sloping of excavations
• Ventilation
• Adequate exit signs

iv. Work Platforms, Scaffolds and Ladders

• Posting of load limits on landing platforms
• Tagging of scaffolds
• Ladder tie off and footing

v. Fire Prevention

• Availability of fire extinguishers (location and condition)
• Storage of flammable and combustible materials
• Signposting and guarding of fuel storage areas

vi. Personal Protection Equipment

• Fall arrest equipment
• Smoke eaters
• Burning and welding eye and body protection (goggles, face shields, glove, etc.)
• Safety glasses
• Respirators
• Hard toed boots
• Hardhats
• Suitable clothing (no shorts or sleeveless shirts)

vii. Procedures

• Lockout
• Confined space entry
• Evacuation of an injured worker
• Overhead electrical cables

An inspection report will be completed. A copy of the report, together with a copy of noncompliance or safety violation notices and plan and schedules for corrective actions, will be forwarded to the Project Safety Manager. A copy of the report will also be posted in conspicuous location adjacent to the inspected area.
3 Inspection by Construction Management

The Project Safety Manager, Project Safety Officers, and other members of the Construction Management team will conduct periodic site inspections to determine the effectiveness of the contractor's Health and Safety Program. Their inspections will include determining the worker's knowledge of the contractor's Health and Safety Program.

Where required, they will shut down the contractor's work if, in their opinion, there is imminent danger to personnel or property. Verbal orders will be confirmed in writing.

4 Audits

The Construction Manager will ascertain whether the following documentation is in place:

- Confirmation of attendance, by all on-site construction personnel, at the site orientation course
- Confirmation of training in hazardous materials awareness and handling
- Each contractor's job specific orientation course.

The Construction Manager will ascertain whether the documentation on the following is received from each contractor, as required

- Emergency evacuation of an injured worker
- Lockout
- Confined space entry
- Work with asbestos
- Hot work
- Excavation
- Accident / incident investigations
- Written job hazard analysis
- Respirator program
- Fall protection program
- Hazardous materials

The Construction manager will ascertain whether the following documentation is received regularly, and in a timely manner, from each contractor.

- Worksite inspection reports
- Minutes of safety meetings
- Lost time accident reports
- Fire extinguisher inspection reports
- Updated lockout log
- Confirmation that all his/her site employees have received and understood the job safety orientation course
- Confirmation of attendance, by all construction management staff and contractors supervisory and management staff at the Safety Awareness Course.
5 Checklist

A checklist will be completed regularly (at least monthly) by the Project Safety Manager, for each contractor on site. A copy of the completed checklists will be issued to the Construction manager, Nahanni Safety Director and the contractor.

6 Independent Audit

Once a year a site-wide audit will be conducted by an outside, independent auditor to determine if the site Health and Safety Program is effective.

7 Job Hazard Analysis

All work processes will be analyzed, by the contractor, for the particular hazards inherent to the type of work being done.

The hazard analysis will include:

- A review of the work methods
- Listing of the hazards
- Procedures to be adopted to minimize the risks.

The hazard analysis will be reviewed with all the workers involved. For large or dangerous work processes (i.e. steel erection, utility bridge pipe installation) the requirement for a written hazard analysis will be reviewed with the Project Safety Manager.

15. Subcontractor Management

Break-away Drilling & Blasting:

Subcontractor will:

Subcontractor’s responsibilities for Health and Safety

- Reads, understands and signs off the Project Specific Safety Program.
- Demonstrates leadership and cooperates with the project superintendent in all matters relating to safety.
- Ensuring that all their employees attend the job specific orientation session prior to beginning work on the project.
- Actively participate and complying with all Nahanni Construction Health and Safety programs standards and efforts as well as applicable government regulations.
- Ensure that all their workers are aware of applicable Nahanni Construction standards and government legislation requirements.
• Provide experienced and qualified supervision.

• Ensure that all personnel are qualified through appropriate competency based job training or direct supervision.

• Ensure that, daily tool box safety meetings are held and recorded, and copies of these sections are submitted to the Nahanni Construction Project Superintendent.

• Attend weekly project safety meetings.

• Reporting and investigating all accident/incidents, refusals and near misses to Nahanni Construction Superintendent immediately.

• Adequately identify and control all hazards that have the potential to cause losses on the site or to the environment.

• Stopping work when a hazardous condition poses a risk to any individual’s health or safety or to the environment.

In closing, the policies outlined in this document will be continuously reviewed, and modified, where required, as the work progresses, and new concerns are identified.