Health and Safety Policy Statement

ITC Group of Companies shall ensure effective leadership in health and safety management throughout our organization. We are committed to providing a safe and healthy work environment for all persons on or near our construction projects.

ITC believes that safety is everyone's business and recognizes the Right to Work in a Safe and Healthy Workplace. All employees have the Right to Know about hazards; the Right to Refuse unsafe work; and the Right to Participate in health and safety. We expect everyone to work in a spirit of consultation and cooperation to ensure we adhere to applicable legislation, acceptable industry standards, and ITC's Health, Safety and Environmental Management System and Programs.

Management is accountable and responsible for providing a safe workplace, and the implementation of the company's HSE Program. Management shall adhere to, promote and support the HSE System. Management shall ensure all relevant stakeholders are informed of the company's expectations for health and safety.

Superintendents, Supervisors and Project Safety Coordinators are accountable and responsible for ensuring that all tools, equipment and utilities are sufficient for the workers to perform their jobs safely. They shall ensure that everyone at the workplace complies with our HSE Program, our policies, regulations and other best practices, or legislative standards. They shall set a good example by following all safety regulations and by effectively promoting our HSE program.

Workers are accountable and responsible to abide by the company's HSE Program and to follow the applicable legislation and regulations. Workers shall conduct themselves in a safe manner that does not endanger themselves, others, or cause property damage. Workers must correct unsafe conditions and/or report any unsafe conditions and/or injuries immediately to their supervisor.

ITC acknowledges that every employee has the right to a workplace that is free from discrimination and harassment in any form. ITC is committed to providing and maintaining a psychologically safe workplace that is respectful, inclusive, and where all individuals are valued.

ITC believes that accident, injury prevention and efficient production go hand in hand. In keeping with our corporate values of *Integrity*, *Trust*, *Commitment*, and *Quality Counts*, we will passionately pursue the latest thinking in health and safety integration, leadership, and culture.

_____
(Sign and Date)

Doug MacFarlane, *President & C.E.O*

_____
(Sign and Date)

Harold Barisoff, *Vice President, Construction*

_____
(Sign and Date)

Mathias Graf, *Vice President, Construction*

ITC Construction Group

Element 1 - Company Health and Safety

1.1 Health, Safety and Environmental Program

The ITC Construction Group (ITC) Health, Safety and Environmental (HSE) Program does not supersede or replace any Provincial Legislation, Code or Act. ITC recognises all federal, provincial or territorial legislation, or any Workplace Health and Safety regulations. ITC employees and trade contractors must be familiar with the health and safety acts, regulations and codes applicable to their province.

The purpose of the HSE Program is to provide a safety management system to effectively implement and manage our HSE policies, programs and applicable documentation. This HSE system, and supplemental safety programs apply to trade contractor employees as well as ITC employees. This HSE Program applies in all Provinces in which ITC may conduct work.

This program outlines ITC's expectations for our values, accountabilities and responsibilities for safety.

This HSE Program and all supplementary programs will be reviewed regularly. These reviews will be done in consultation with relevant stakeholders, including: The Joint health and Safety Committee, Project Safety Coordinators, Workers, and Senior Management. Reviews will be performed at scheduled Committee meetings throughout the year. Additional reviews to be conducted as required with the approval and support of The Joint health and Safety Committee and Management.

The HSE Program must be used in conjunction with the following:

1. All applicable Legislation, Regulation and Codes
2. Workplace Hazardous Materials Information System (WHMIS 2015)
3. Transportation of Dangerous Goods Regulation (TDG)
4. Applicable Provincial / Territorial Traffic Safety Act
5. Environmental Protection Act
6. Any other rules, procedures, programs and written instructions that may meet or exceed the National Certificate of Recognition (COR) requirements
7. An additional safety programs and written instructions developed by ITC Construction Group

ITC Construction Group

1.3 General Accountabilities and Responsibilities

This section outlines general duties assigned to all levels of Management, Supervisors, Workers, First Aid Personnel, Trade Contractors, and Visitors. ITC Construction group has assigned specific safety duties, accountabilities and responsibilities for all workplace parties. All levels of Management must work together in order to establish and maintain proper safety standards, policies, practices, and procedures.

Senior Management must establish and maintain proper safety standards, policies, and procedures. Senior Management has overall accountability and specific responsibilities that include, but are not limited to:

1. Providing leadership by example.
2. Implementing and executing an effective HSE Management System.
3. Providing a safe working environment for workers and work site visitors.
4. Establishing and maintaining a culture of safety within the organization.
5. Ensuring the HSE Program is adequately resourced and funded.
6. Assigning accountabilities and responsibilities for the development, implementation and maintenance of the HSE System and Programs.
7. Reviewing safety records, statistics and reports for the purpose of evaluating activities for future reference and course of actions.

Construction Manager/Project Managers must ensure that the workplace is healthy and safe and that work is carried out in a safe manner. The role of the Construction/Project Manager within the HSE Program is one of management support to the field operations. Specific accountabilities and responsibilities include, but are not necessarily limited to the following:

1. Providing leadership by example.
2. Ensuring adequate training for Superintendents in their health and safety responsibilities.
3. Ensuring Superintendents are knowledgeable of ITC's HSE Program, Policies and Procedures.
4. Supporting Superintendents and assigned PSCs in their Health and Safety activities.
5. Providing trade contractors with ITCs Sub-Contractor Management Program and reviewing the requirements. They are to ensure the ITC contract documents are completed, acknowledged, and signed by Contractor. (*See ITC Trade Contractor Management Program*)
6. Holding Superintendents, Supervisors, and Contractors accountable to maintain the HSE Program.
7. Enforcing all aspects of the HSE System.

Project Superintendents have overall responsibility for the safety of personnel, equipment, property, and the public relative to their assigned project site, as well as the protection of the environment which may be affected by construction activities. (Note: if no PSC is assigned, the Project Superintendent is expected to perform PSC duties.) Specific accountabilities and responsibilities include, but are not necessarily limited to the following:

1. Providing leadership by example.
2. Being knowledgeable about the ITC HSE Management System and Supplemental Programs.
3. Being knowledgeable about the act, code and regulations pertaining the work being performed by all workers under their supervision.
4. Ensuring the HSE program requirements are being effectively implemented at their project.
5. Monitoring, assessing and correcting performance and achievement of HSE expectations on site.
6. Coordinating the development of specialized hazard/risk assessments and development of required exposure control plans and safe job procedures for high risk work.
7. Enforcing all established safety Legislation and ITC's HSE policies, practices, procedures and rules.
8. Ensuring site-specific emergency response plan is developed, communicated and implemented.

Supervisor/Foreman supervise workers and ensure that they are performing their duties properly (*supervisors may also include foremen, assistant or site superintendents, lead hands or other site personnel with designated supervisory responsibilities*). Specific accountabilities and responsibilities include, but are not necessarily limited to the following:

1. Providing leadership by example.
2. Being knowledgeable about the ITC HSE Management System and Supplemental Programs.
3. Being knowledgeable about the act, code and regulations pertaining the work being performed by all workers under their supervision.
4. Ensuring all workers are made aware of all known or reasonably foreseeable health and safety hazards in the area where they work.
5. Ensuring the workers have been provided the information, instruction, training and supervision necessary to ensure their health and safety and the health and safety of others in the workplace.
6. Ensuring sufficient personal protective equipment is available, in good condition and used in accordance with manufacturers specifications.
7. Enforcing all safety rules and regulations through active coaching and progressive discipline.
8. Inspecting daily for unsafe acts or conditions. Taking prompt, corrective action when required to correct any safety or health hazards.
9. Ensuring compliance with the Fall Protection Plans, Exposure Control Plans, and Site Safety Plans.

Workers must observe provincial/territorial occupational health and safety regulations, observe ITC's HSE regulations, work safely, and report any existing or potential safety or health hazard to the first available PSC, Supervisor or Health and Safety Committee member. Specific accountabilities and responsibilities include, but are not necessarily limited to the following:

1. Setting a good example for fellow workers. Conducting themselves in a respectful manner.
2. Taking responsibility for their own safety and for the safety of others.
3. Ensuring that they are physically and mentally fit to perform their assigned duties.
4. Being knowledgeable of the ITC HSE Programs, Practices and Procedures to safely perform duties.
5. Following all Regional Legislation and the ITC HSE Programs, Practices and Procedures.
6. Reporting to their supervisor if they believe that they lack training for a specific task or procedure.
7. Reporting the absence or defect in any equipment, unsafe conditions, unsafe acts, all injuries and all accidents and near misses promptly to a supervisor.

Corporate Safety Manager (CSM) is responsible for developing, implementing, and monitoring the ITC Health Safety and Environment Management System and Supplemental Programs. Specific accountabilities and responsibilities include, but are not necessarily limited to the following:

1. Providing leadership by example.
2. Ensuring the performance of daily functions, and documentation required for the HSE System.
3. Identifying, arranging education and training to increase competency and awareness for ITC staff.
4. Facilitating Claims Management through active monitoring of the Injury Management Program.
5. Establishing incident prevention standards, assignment of accountability and controls.
6. Measuring and evaluating the effectiveness of the accident and loss control system and the modifications needed to achieve optimum results.
7. Analysing data from Incident Investigations for trend identification and prevention strategies.

Safety Manager applies ITC's HSE Management System and the provincial/territorial occupational health and safety regulations to the workplace. They will provide direction and guidance to site management and specifically the Project Safety Coordinators (PSC) they assign to each project. The Safety Manager will ensure PSCs are adequately trained and monitored to fulfill their responsibilities for health and safety in workplace. Specific accountabilities and responsibilities include, but are not necessarily limited to the following:

1. Providing leadership by example.
2. Training, assessing (knowledge and competency) and mentoring the PSCs at each workplace.
3. Maintaining an effective system for measuring supervisory safety performance, through periodic formal inspections of worksites for safety practices, conditions and documentation.
4. Identifying and assessing the severity of incidents, loss producing conditions and practices.
5. Preparing monthly statistical and active claims reports to CSM and Safety Committees.
6. Developing, implementing, and maintaining comprehensive Emergency Response Plans (ERP) based on a site-specific project risk assessment (Communication of ERPs by site management).

Project Safety Coordinator (PSC) will assist with the development, implementation and monitoring of the project specific HSE plan as mandated by the ITC HSE Management System and will report to the site superintendent. Specific accountabilities and responsibilities include, but are not necessarily limited to the following:

1. Providing leadership by example.
2. Acting as a resource for management, supervisors and workers requiring direction or instruction to ensure a safe workplace.
3. Implementing ITC's HSE Management System and maintaining project documentation.
4. Being knowledgeable of the Injury Management Program and ensuring effective implementation.
5. Anticipating, identifying and evaluating and reporting hazardous conditions and practices.
6. Ensuring adequate Emergency Response Plans (i.e. fire plan, evacuation, man down, first aid…) are established, tested and communicated. Ensuring they are updated quarterly.
7. Monitoring and enforcing ITC health and safety expectations and requirements.
8. Preparing a monthly summary statistics report for the project team and Safety Manager to review.
10. Obtaining, reviewing and monitoring compliance with trade and ITC submitted Fall Protection Plans, Exposure Control Plans, and Site Safety Plans.

First Aid Attendants appointed by ITC Project Superintendent's shall hold valid certification as required. Specific accountabilities and responsibilities include, but are not necessarily limited to the following:

1. Ensuring that no other duties supersede their responsibilities as a first aid attendant.
2. Providing first aid professionally and maintaining the patient's confidence.
3. Reporting to the direct supervisor of any worker, prior to referring any worker to medical aid.
4. Being knowledgeable about the ITC Injury Management Program.
5. Informing the Injury Management Coordinator immediately regarding any injured ITC employees.
6. Ensuring access to site SDS inventory for all hazardous materials on site.
7. Being knowledgeable about blood borne pathogens (bio-hazardous), communicable diseases and Covid-19 precautions.

Trade Contractors are accountable and responsible to perform their job in compliance with Federal, Provincial and municipal legislation and by-laws, as well as following our HSE Management System. The contractor will provide documentation indicating that the workers have been made aware of the known hazards and the possible foreseeable hazards of the job, in addition to having been trained in the safe work practices and safe job procedures required for the job.

The contractor is responsible to provide all training, safety equipment, and proper supervisor for their workers as required by Regulations/Code. Contractors are to ensure that a full-time competent supervisor is on site fulfilling these duties. Each contractor must submit their Company's Occupational Health and Safety Program and their Safety Data Sheets to prior to starting on the job.

All contractors will be monitored for compliance during ITC workplace inspections. Prior to contractors working on site, the suitability of the contractor will be determined by review of their records and past performance (if applicable). Contractors workers will be given an ITC site orientation prior to working.

Any safety infringements will be recorded and corrective actions put into place and monitored. Safety performance of contractors will be discussed at safety meetings.

All Trade Contractors and ITC Management and Safety Personnel shall be familiar with the ITC Trade Contractor Program and the applicable accountabilities and responsibilities of those hired to perform work.

Reference *ITC Trade Contractor Management Program* for requirements and program details.

Visitors to a work site must do the following:

1. Receive a full safety orientation or receive a Visitor safety orientation and be escorted by designated guide who has received a full worker orientation.
2. Comply with ITC's HSE Management System and programs.
3. Wear the proper personal protective equipment (PPE) which will include safety boots, hard hats and other specialized PPE as may be required depending on the site.

Any incident, or injury sustained on the worksite by a visitor must be immediately reported to the PSC and Project Superintendent.

Forms

Appendices

Appendix – ITC HSE Review Index
Appendix – ITC HSE Supplemental Programs – ITC Trade Contractor Management Program
Appendix – ITC HSE Supplemental Programs – ITC Injury Management Program

Element 2- Hazard Identification & Risk Assessment

Acronym Reference:

➢ Hazard Identification and Risk Assessment (HIRA)
➢ Company Hazard Assessment (CHA)
➢ Project Risk Management Checklist (PRMC)
➢ Project Hazard Identification and Risk Assessment (PHIRA)
➢ Weekly Hazard Identification and Risk Assessment (WHIRA)
➢ Trade Contractor Project Hazard Identification & Risk Assessment (TC-PHIRA)
➢ Daily Hazard Assessment (DHA)

2.1 Hazard Identification & Risk Assessment Policy

ITC understands the importance of Hazard Identification and Risk Assessment to ensure a safe and healthy workplace. To ensure the safety of the public, employees and workers at all ITC workplaces, all necessary Hazard Identification and Risk Assessments will be completed and communicated for all work areas. The ITC Hazard Identification and Risk Assessment (HIRA) process will identify, assess, and control hazards to reduce the risk of harm to public, workers, equipment, and property.

ITC will work cooperatively with its trade contractors to ensure that all hazards associated with their tasks are identified and appropriate controls are implemented. ITC will ensure contractors site-specific Health and Safety Plans include Safe Work Practices, Safe Job Procedures and Emergency Response Procedures that are appropriate for their identified hazards.

2.2 General Accountabilities and Responsibilities

This section outlines hazard identification and risk assessment duties assigned to all levels of Management, Supervisors, Workers, Trade Contractors, and Visitors.

Senior Management must:

1. Ensure that a **Project Risk Management Checklist** (PRMC) is undertaken for all new ITC projects.
2. Ensure outcomes are promptly communicated to the assigned Construction Manager and/or Project Manager and Corporate Safety Manager (CSM).

Construction Manager/Project Managers must:

1. Ensure to communicate the project specific safety requirements to the senior project team.
2. Ensure the CSM and the Safety Manager have been provided the **Project Risk Management Checklist** (PRMC).
3. Provide Nav Canada and Transport Canada with crane and building elevations and locations.
4. Ensure the assigned Project Superintendent and/or Project Safety Coordinator (PSC) is provided with all required information to assist with development of the initial **Project Hazard Identification and Risk Assessment** (PHIRA).
5. Ensure to regularly review the **PHIRA**(s) and **Weekly HIRA**(s) to identify missing (upcoming) scope(s) of work with the Project Superintendent and/or PSC.

6. Ensure to acknowledge review the quarterly completed **PHIRA**(s) by signature and date of review.
7. Holds employees accountable for their responsibilities in the hazard assessment process.
8. Ensure hired Trade Contractors have been provided with the ITC Trade Contractor Program for requirements to work on ITC projects as per the ITC *Trade Contractor Management Program. (Completed Trade Contractor Agreements to be uploaded to Contractor Profile for all site access).*

Project Superintendents must:

1. Ensure to communicate the project specific safety requirements to the site level project team.
2. Ensure the assigned Project Safety Coordinator(s) (PSC) is provided with all required information to develop the initial and maintain the ongoing (quarterly updated or at appropriate project benchmarks) **Project Hazard Identification and Risk Assessment** (PHIRA).
3. Ensure to participate in the development of the **Weekly HIRA** with the PSC(s) for upcoming all scopes of work to ensure relevance and compliance.
4. Ensure planned, effective trade coordination of work activities based on hazard assessments.
5. Ensure resources are available for the identified control measures to be implemented.

Supervisor/Foreman must:

1. Assist in the development of **PHIRA**s, **Job Hazard Analysis**'s (JHAs), and **Weekly HIRA**.
2. Complete and review the ITC Daily **Hazard Assessments** (DHAs).
3. Ensure workers are informed of the hazards and risks at the worksite- documented on the **DHA**s.
4. Ensure workers are trained for the job tasks and required hazard controls, and emergency response procedures to be implemented- documented on the **DHA**s- additionally noted on Exposure Control Plans, Safe Work Practices and Safe Job Procedures etc.
5. Monitor compliance with the established hazard controls- documented on the **DHA**s.
6. Take steps to document and correct the unsafe actions or behaviours through implementation of the ITC Progressive Discipline and Non-Conformance Process.

Workers must:

1. Participate in the hazard assessment process.
2. Be knowledgeable about the hazards associated with their work.
3. Comply with the identified control measures.
4. Report new hazards found in the workplace to their immediate supervisors.

Corporate Safety Manager (CSM) must:

1. Ensure the ITC HIRA process is effectively implemented at all levels.
2. Ensure to review the initial new project **PRMC** and **PHIRA** before issued to site level.
3. Determine whether an outside consulting professional resources are required.
4. Arrange for the completion of any required supplemental assessments.
5. Review hazard assessment results and control measure effectiveness through management meetings and statistical reports.
6. Oversee and implement control measures that cannot be resolved at a lower level.
7. Ensure the Project Manager/Construction Manager are providing adequate information for the

development of *Trade Contractor Profiles.*

8. Ensure Trade Contractors are being monitored for safety as per the ITC *Trade Contractor Management Program.*

Safety Manager must:

1. Have an active role in the hazard assessment process. Working in consultation with Project Managers, Project Superintendents, PSCs, Supervisors, and Trade Contractors to assist in the assessment and control of hazards and risks at site level.
2. Ensure required company hazard assessments have been completed. They are to be reviewed and approved through Joint Health Safety Committee (JHSC) meetings.
3. Participate in the development of ongoing hazard assessments, including but not limited to: **PRMC**, **PHIRA**s, **Weekly HIRA**s, **JHA**s and **DHA**s.
4. Reviews and approves submitted **PHIRA**s and discusses trends through JHSC meetings.
5. Provide required/missing training for controlling the hazards identified to the PSCs.
6. Ensure the emergency response procedures are appropriate for the hazards identified.
7. Ensure the PSCs have provided required/missing training for controlling the hazards identified to the site personnel and site workers.
8. Ensure the requirements of the ITC *Trade Contractor Management Program* are met*.*

Project Safety Coordinator (PSC) must:

1. Assist the Project Manager and the Project Superintendent in the development of the **Weekly HIRA**s for upcoming all scopes of work to ensure relevance and compliance.
2. Complete the site-specific **PHIRA** (minimum quarterly or at appropriate benchmarks) incorporating the necessary hazard control measures and emergency response procedures.
3. Provide any required training for controlling the hazards identified and any emergency response procedures at site level.
4. Participate and/or develop required JHAs as identified through the HIRA process. (Include all relevant stakeholders as required in order to complete).
5. Ensure Trade Contractors have provided a **Trade Contractor- Project Hazard Assessment** and applicable Safe Work Practices and Safe Job Procedures prior to commencing work on site.
6. Assist in the identification, evaluation, control and documentation of hazards in the workplace.

Trade Contractors are accountable and responsible to perform their job in compliance with Federal, Provincial and municipal legislation and by-laws, as well as following our HSE Management System.

Reference *ITC HSE Trade Contractor Management Program* for requirements and program details.

Visitors to a work site must do the following:

1. Receive a full safety orientation or receive a Visitor safety orientation and be escorted by designated guide who has received a full worker orientation.
2. Participate in the hazard assessment process i.e. Report new hazards found to their escort.
3. Comply with the identified control measures*.*

2.3 Hazard Control Hierarchy

A hierarchy of controls exists for managing the hazards and risks identified though HIRA process:

Elimination (including substitution and isolation): remove the hazard from the workplace. *An example from an identified falling hazard would be the installation of a guardrail to eliminate the risk of falling.*

Engineering Controls: includes designs or modifications to plants, equipment, ventilation systems, and processes that reduce the source of exposure. *An example from an identified falling hazard would be the installation of a fall restraint horizontal lifeline or anchor system that would ensure that an employee can't fall over the exposed edge of drop-off.*

Administrative Controls: controls that alter the way the work is done, including timing of work, policies and other rules, and work practices such as standards and operating procedures (including training, housekeeping, and equipment maintenance, and personal hygiene practices). *An example from an identified falling hazard would be the implementation of Safe Job Procedures and training of the employees in their effective implementation.*

Personal Protective Equipment: equipment worn by individuals to reduce exposure such as contact with chemicals or exposure to noise. *An example from an identified falling hazard would be the use of a properly fitted harness and fall arrest system to protect the employee from striking the surface below in the event of a fall.* The use of PPE alone should be considered only if all other options have been determined to be not reasonable or practicable.

Monitoring

Regardless of the control measures used to protect the worker, property and the environment from specific hazards, planned and informal inspections, audits and monitoring are required to ensure that control measures remain effective.

The monitoring may be:
- Evaluating the workplace control measures on a regular basis.
- Atmospheric evaluations to determine the presence and concentration of toxic substances.
- Area noise monitoring and/or personal noise dosimetry.
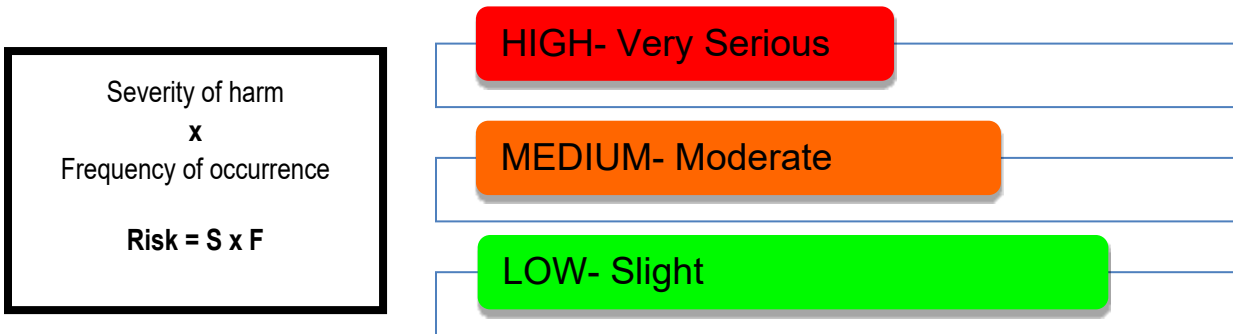- Inspection of personal protective clothing and equipment.
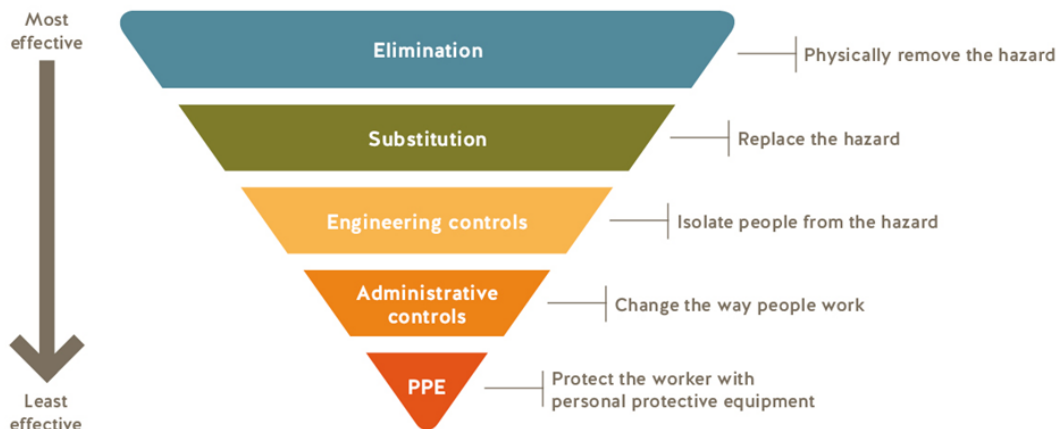
2.4 Hazard Classification – Ranking

A hazard can lead to different injuries, each with their own severity, and each with their probability. Our hazard identification component consists of the identification of harm that could impact a person, the environment, equipment, materials or the process.

The PHIRA and JHAs would rate the consequent *severity* of impact if the hazard did occur. The Risk Assessment component consists of the evaluation of the *frequency* of the hazard occurring. Based on the combination of these assessments, a ranking of Low, Medium or High is assigned to the hazard and recorded on the applicable form.

Severity of harm **x** Frequency of occurrence **Risk = S x F**	HIGH- Very Serious
	MEDIUM- Moderate
	LOW- Slight

Determine the risk by combining Frequency (Probability) and Severity for each scenario. The highest severity found, is the level of risk associated with the job task.

Frequency X Severity Chart:

FREQUENCY (Probability) of hazard occurring during the foreseeable timeline of the project.		SEVERITY of Injury caused by the Hazard		
		HIGH (Immediate danger)	**MEDIUM** (High danger to life)	**LOW** (low danger to life)
Frequent- daily	**ONE (1)**	H	H	M
Regular-every few days	**TWO (2)**	H	M	L
Rarely- every few weeks	**THREE (3)**	M	L	L
Controls to be implemented in a timely manner.		Immediately	Before the end of shift	24-48 hours

In some instances, hazard assessment and evaluation will involve the use of third-party professionals.

2.5 Hazard Identification & Risk Assessment Procedure

STEP 1

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COMPANY HAZARD ASSESSMENTS

Company Hazard Assessments are generated for general tasks in the office, yard, and general field operations. The Safety Manager will develop and review these assessments in conjunction with the JHSC at a minimum once every three (3) years to ensure relevance and compliance.

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PROJECT RISK MANAGEMENT CHECKLIST

Prior to the start of a job, the Project Manager/Construction Manager, Project Coordinator, Project Superintendent and CSM will complete the **Project Risk Management Checklist** located in *Share Point-Forms*.

- Potential hazards will be considered, and measures will be put in place to eliminate or control.
- Emergency planning for locations, response times and routes to and from the nearest Hospital, Fire and Police locations will be determined.
- A list of equipment to be used on the project will be reviewed.
- All utilities including gas, electricity, storm sewer, communications, etc. will be identified.
- Environmental risks may be encountered when working near watercourses. Environmental measures and/or site-specific procedures will need to be followed.

Communication – The Project Manager/Construction Manager will initiate a project start up meeting with all senior management. During the meeting they will address all items on the checklists and send them out with the meeting minutes.

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STEP 2

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PROJECT HAZARD IDENTIFICATION AND RISK ASSESSMENT

The Safety Manager shall assist the Project Superintendent and Project Safety Coordinator in the completion the initial and subsequent *Project Hazard Identification and Risk Assessment* (PHIRA).

Subsequent assessments are to be performed by the PSCs every three (3) months or at project benchmarks such as: breaking ground, crane erection, structure complete etc.

Communication – They are submitted to the Project Manager/Construction Manager and the Safety Manager for review and acknowledgment upon completion. Copies are to be made available for the site Joint Health and Safety Committee. The on-site Supervisor/foreman and/or PSC will communicate the hazards present to the workers during **DHA**s and regular toolbox talks.

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STEP 3

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WEEKLY HAZARD IDENTIFICATION AND RISK ASSESSMENT

The Project Superintendent and the PSC identify upcoming work activities that will require planning beyond typical construction procedures. Trade coordination of site activities (based on hazard assessments) must be included in the **Weekly HIRA**. Project scheduling of upcoming work requiring trade coordination must be communicated to all relevant stakeholders. This scheduling communication must be documented i.e. meeting minutes, emails etc.

PSCs are required to complete the **Weekly HIRA** with the site management team (Superintendent, assistant superintendent, project coordinator). This document is scanned and saved into SharePoint as well as emailed to the Safety Manager by 12:00 PM Friday for the pre-ceding week.

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STEP 4

STEP 5

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JOB HAZARD ASSESSMENT

When a high-risk task or job is to be performed and there is no relevant Safe Job Procedure available for the crew to review, a **JHA** will be generated along with a relevant Safe Job Procedure. ITC required **JHA**s are to be generated by the PSCs, in conjunction with management, supervisors and workers. Trade Contractors will be required to generate their own **JHA**s for scopes of work that are identified as "High Risk".

*Considerations that must be factored into any **JHA** include, but are not limited to:*
- Skill needed to perform the job and expertise available.
- Health monitoring results - noise, chemical/biological, radiation and air quality.
- Government regulations.
- Coordination between other crews.
- Communication barriers - Blind spots, noise.
- Schedules or time restraints.
- Frequency task is performed daily, weekly, monthly, yearly.
- Environmental factors such as weather and soil conditions.

Job/Task Assessment Steps:
a) Assemble workers involved in the task or job.
b) Review scope of work to be performed.
c) Break the task or job into Individual steps
d) Identify both actual and potential hazards.
e) Develop appropriate controls for each hazard.
f) Review the assessment.
g) Communicate the assessment and controls to all workers.

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TRADE CONTRACTOR
PROJECT HAZARD IDENTIFICATION AND RISK ASSESSMENT

Trade Contractors are required to complete the **TC-PHIRA** and submit it to the Project Manager/Construction Manager prior to working on site. Trade Contractors are required to update their **TC-PHIRA** at a minimum quarterly (as required) and submit it to the site PSC for review. ITC will provide tools and assistance within reason to assist trades with compliance.

Reference *ITC Trade Contractor Management Program* for requirements and program details.

STEP 6

DAILY HAZARD ASSESSMENT

DHAs are completed prior to beginning work for all ongoing field jobs. Each will include the relevant project specific hazards, and task specific hazards for each crew member.

It will be the responsibility of the crew Supervisor/Foreman to ensure that a **DHA** is completed, reviewed and acknowledged by the crew prior to beginning work.

Supervisors must ensure all hazards that workers may be exposed to are identified, communicated to workers and effectively controlled.

The Supervisor/Foreman will note the time of their observations (informal site inspection) on the **DHA**, confirming that the identified controls are in place, adequate and effective. Where new hazards are found the Supervisor/Foreman must make note of it in the comment section of the **DHA** form and ensure they are identified and effectively controlled.

Trade Contractors are to complete their own **DHA** as per *ITC's Trade Contractor Management Program*.

STEP 7

Critical Task List

The Critical Task List is populated through a review of the PHIRA. Job tasks identified as 'High Risk' will be noted on the PHIRA and have a corresponding JHA and/or Safe Work Practice (SWP) and/or Safe Job Procedure (SJP) as required to perform the task safely.

Examples of critical tasks could include, but are not limited to, the following: Confined Space Entry, Working at Heights requiring Fall Protection, Excavation activities, Work involving high-voltage electrical hazards, Working with hazardous materials (Asbestos, Crystalline Silica, explosives, etc.), Working with or around large heavy machinery and equipment (cranes) etc.

STEP 8

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2.6 Communication and Training

Hazard Assessments will be communicated to all relevant stakeholders. The primary delivery methods are company and site orientations, morning meetings i.e. DHAs, Toolbox Talks etc. Communication of hazards will be documented with attendance taken and/or direct signature acknowledgement.

Specific training in relation to those conducting these hazard assessments will also be provided as required.

2.7 Review Process

Hazard assessments are an on-going task that requires monitoring and review to ensure workers are effectively protected.

Company Hazard Assessments will be reviewed by management and workers through the JHSC at a minimum of once every three (3) years to ensure relevance and compliance.

Project Hazard Identification & Risk Assessments (PHIRA) will be reviewed at a minimum quarterly (Every three (3) months) or at identified project benchmarks (as noted above).

Forms

ITC HSE Company Hazard Assessments (CHA)
ITC HSE Project Risk Management Checklist (PRMC)
ITC HSE Project Hazard Identification & Risk Assessment (PHIRA)
ITC HSE Weekly Hazard Identification & Risk Assessment (WHIRA)
ITC HSE Job Hazard Analysis (JHA)
ITC HSE Trade Contractor Project Hazard Identification & Risk Assessment (TC-PHIRA)
ITC HSE Daily Hazard Assessment (DHA)

Appendices

Appendix – ITC HSE Review Index
Appendix – ITC HSE Risk Assessments
Appendix – ITC HSE Supplemental Programs – ITC Trade Contractor Management

Element 3- Safe Work Practice

3.1 Safe Work Practice Policy

ITC is committed to complete all work safely, efficiently, and on time. ITC has established a set of Safe Work Practices (SWPs) outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes.

SWPs are written best practices or guidelines "Do's and Don'ts" that have been established to help workers perform their work tasks safely.

ITC has developed specific Safe Work Practices applicable for common construction activities. To promote SWPs, ITC will do the following:

➢ Put our safe work practices in writing
➢ Make safe work practices available to all workers by keeping a copy at each work site
➢ Provide Management support for safe work practices
➢ Require that Supervisors enforce use of, and compliance with, these safe work practices

In compiling these SWPs, the following reference material was consulted:

➢ The regulating provincial authorities having jurisdiction regarding safety legislation
➢ Manufacture's manuals
➢ Health hazard data and Safety Data Sheets
➢ Supervisors input and contributions
➢ Worker input and contributions

All Supervisors are required to be familiar with safe work practices and understand the different hazard ratings as determined by our risk assessment process.

All PSCs are to thoroughly understand ITCs SWPs and how they apply to various scopes of work. They need to be able to locate approved, relevant and current ITC SWPs for consistent implementation.

ITC's SWPs are for reference only. Written SWPs may need to be adjusted to reflect site specific scope of work. If a modification of a SWP is required, the revision must be approved by the Safety Manager prior to implementation. Documentation shall be generated on approved templates (*See ITC SWP/SJP Template*).

3.2 Communication and Training

ITC will ensure all supervisors and workers are knowledgeable of the SWPs and will do the following:

➢ Put our SWPs in writing
➢ Make SWPs available to all workers by keeping a copy at each work site
➢ Provide safe equipment and material to work with
➢ Provide Management support for SWPs

> Require that Supervisors enforce use of, and compliance with, these SWPs

Required SWPs will be communicated to all relevant stakeholders. The primary delivery methods are company and site orientations, safety meetings i.e. DHAs, weekly Toolbox Talks etc. Communication of hazards will be documented with attendance taken and/or direct signature acknowledgement.

All Supervisors are required to be familiar with ITCs written SWPs.

In the absence of a written safe work practice for a specific 'high risk' task the site team will generate one. The developed SWP will be sent to the Safety Manager for formal review and approval. The approved 'high risk' site specific SWP will be presented to the RJHSC for consideration of inclusion to the ITC SWP resource Inventory.

3.3 Review Process

Based on a three-year historical review cycle, the Joint Health, and Safety Committee (JHSC) will annually schedule to conduct a review of a section of the SWPs from the HSE program. This review schedule is documented on the SWP Inventory and Review Index.

Additional reviews will be performed as required for site specific SWPs development. General required updates identified should be proposed to the JHSC for implementation approval to the ITC master template.

Forms

ITC SWP/SJP Template

Appendices

Appendix – ITC HSE Review Index
Appendix – ITC HSE Safe Work Practices

ITC Corporate Office
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Tel: 604-685-0111   Fax: 604-685-0112   Revision Number: 2023-3

Element 4- Safe Job Procedure

4.1 Safe Job Procedure Policy

ITC is committed to complete all work safely, efficiently, and on time. ITC has established a set of Safe Job Procedure (SJPs) outlining how to perform a certain task with minimum risk to people, equipment, materials, environment, and processes.

SJPs are written, step-by-step instructions (chronologically) for how to complete from start to finish. SJPs will identify the hazards the worker is exposed to and identify the required controls.

ITC has developed specific Safe Job Procedures applicable for common construction activities. To promote SJPs, ITC will do the following:

➢ Put our safe job procedures in writing
➢ Make safe job procedures available to all workers by keeping a copy at each work site
➢ Provide Management support for safe job procedures
➢ Require that Supervisors enforce use of, and compliance with, these safe job procedures

In compiling these SJPs, the following reference material was consulted:

➢ The regulating provincial authorities having jurisdiction regarding safety legislation
➢ Manufacture's manuals
➢ Health hazard data and Safety Data Sheets
➢ Supervisors input and contributions
➢ Worker input and contributions

All Supervisors are required to be familiar with safe job procedures and understand the different hazard ratings as determined by our risk assessment process.

All PSCs are to thoroughly understand ITCs SJPs and how they apply to various scopes of work. They need to be able to locate approved, relevant, and current ITC SJPs for consistent implementation.

ITC's SJPs are developed for reference only. Written SJPs may need to be adjusted to reflect site specific scope of work. If a modification of a SJP is required, the revision must be approved by the Safety Manager prior to implementation. Documentation shall be generated on approved templates (*See ITC SWP/SJP Template*).

4.2 Communication and Training

ITC will ensure all supervisors and workers are knowledgeable of the SJPs and will do the following:

➢ Put our safe job procedures in writing
➢ Make safe job procedures available to all workers by keeping a copy at each work site
➢ Provide safe equipment and material to work with
➢ Provide Management support for safe job procedures

ITC Construction Group

> ➤ Require that Supervisors enforce use of, and compliance with, these safe job procedures

SJPs will be communicated to all relevant stakeholders. The primary delivery methods are company and site orientations, safety meetings i.e., DHAs, weekly Toolbox Talks etc. Communication of hazards will be documented with attendance taken and/or direct signature acknowledgement.

All Supervisors are required to be familiar with ITCs written SJPs.

In the absence of a written procedure for a specific 'high risk' task the site team will generate one. The developed SJP will be sent to the Safety Manager for formal review and approval. The approved 'high risk' site specific SJP will be presented to the RJHSC for consideration of inclusion to the ITC SJP resource Inventory.

4.3 Review Process

Based on a three-year historical review cycle, the Joint Health, and Safety Committee (JHSC) will annually schedule to conduct a review of a section of the SJPs from the HSE program. This review schedule is documented on the SJP Inventory and Review Index.

Additional reviews will be performed as required for site specific SJPs development. General required updates identified should be proposed to the JHSC for implementation approval to the ITC master template.

Forms

ITC SWP/SJP Template

Appendices

Appendix – ITC HSE Review Index
Appendix – ITC HSE Safe Job Procedures

Element 5- Company Rules and Conduct Policies

5.1 Purpose

The purpose of this policy is to outline ITCs expectations and requirements for all workers, while working for ITC Construction Group. ITC expects all personnel to conduct themselves in a professional manner. ITC's progressive discipline process below, provides the framework to assist with employee / trade worker conduct and non-conformance issues.

5.2 Company Rules and Conduct Policies

ITC is committed to ensuring that every worker is provided a safe and healthy work environment in which all personnel are treated with respect and dignity. The ITC progressive discipline process is a respectful and clear way of working with our employees when dealing with job-related behaviour that does not meet expected and communicated performance expectations.

5.3 Workplace Conduct

ITC is committed to providing a work environment that is supportive of the dignity and self-esteem of all workers. Violence, Bullying and/or Harassment violates this commitment, it is unwelcomed, and it will not be permitted. This policy applies to all workers and is extended to any person that worker may meet with.

Definitions:

"Bulling and Harassment": is (a) includes any inappropriate conduct or comment by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated, but (b) excludes any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment.

 "Violence" is 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.

5.4 Bullying and Harassment

Every employee has the right to a workplace that is free from harassment in any form. Bullying and harassment is unacceptable and will not be tolerated. ITC will make every reasonable effort to prevent and eliminate all bullying and harassment from their workplaces. ITC will participate fairly and appropriately with any complaint received. *See ITC Respect in the Workplace* Policy located in the *ITC HSE Appendices,* under *Conduct Policies.*

5.5 Violence

ITC is committed to maintaining a work environment free from violence, threats of violence, harassment, intimidation, and other disruptive behaviour. No one should ever feel threatened or unsafe while on our premises.

Anyone who engages in any physical assault, threatening behaviour or verbal abuse will be immediately removed from the premises and subject to disciplinary action. *See ITC Respect in the Workplace* Policy located in the *ITC HSE Appendices,* under *Conduct Policies.*

5.6 Impairment in the Workplace Policy

Impairment in the workplace will not be tolerated. No worker will enter or remain at the workplace while alcohol; drugs *or other substances affect the worker's ability to work*. If a worker is suspected of alcohol, drug, or other substance abuse at work, this must be reported to the Project Supervisor immediately.

The ITC 'Impairment in the Workplace Policy' is reviewed by an ITC orientation administrator with all new employees and trade contractors at the time of their onboarding.

If a worker is observed (witnessed) acting in a dangerous, reckless, or intoxicated manner as evaluated using the ITC '*Reasonable Suspicion Checklist'*. The Supervisor will follow the *ITC Impairment in the Workplace Procedure See ITC Impairment in the Workplace Policy* located in the *ITC HSE Appendices,* under *Conduct Policies.*

5.7 Fitness for Duty

It is important that each worker is ready for work each day "fit for duty". While typically considered to be alcohol or drug related, we also consider fatigue and stress as impairment factors.

Fatigue and Stress

Construction work involves high-risk activities. To work safely, construction workers must be physically and mentally alert. This means that fatigue and stress are a potential risk. ITC Construction Group will manage fatigue and stress in the workplace through administrative controls such as job rotation, reduced overtime, planned breaks, etc. Workers are expected to inform the supervisors if they are experiencing symptoms of fatigue or stress while working.

5.8 Behaviour Modification Policy

Supervisors must correct any unproductive or unsafe behaviour. Supervisors will encourage good behaviour by setting a personal example and encouraging others in a positive way. When observed not following safe job procedures, use a friendly, positive approach to correct the unwanted behaviour.

If this approach does not correct the behaviour, the supervisor must proceed with the Progressive Disciplinary Policy outlined below. In no case can a supervisor allow unsafe behaviour(s) to continue.

5.9 Company Rules

The following Company Rules apply to all ITC employees, trade contractors, suppliers, and visitors. These rules are not exhaustive but rather a guideline for expected conduct. A copy is to be conspicuously posted and readily available.

> *Failure to comply with ITC's HSE Safety Management System and Programs; OHS Regulations/ Codes and/or other relevant federal or provincial legislation may result in a suspension or termination from the company and/or removal from all ITC premises/projects (employees, trade contractors, visitors).*

1. All ITC employees must receive an *ITC Corporate Orientation* before commencing work. Additionally, all ITC employees, trade contractors, visitors must receive an *ITC site-specific Orientation* prior to commencing work and/or entering ITC premises or job sites. (*See Element 8- Training and Communication for the ITC Orientation Processes*).
2. All necessary Personal Protective Equipment (PPE) must be used as and when required.
3. Violence, Bullying and Harassment of any sort i.e., threatening, intimidating, harassing, discriminating, or fighting will not be tolerated. (*See ITC Conduct Polices*)
4. Impairment in the workplace is prohibited. (*See ITC Conduct Polices*)
5. Horseplay or unnecessarily boisterous conduct on ITC will not be tolerated.
6. All hazardous conditions or acts must be reported to your supervisor for a prompt correction.
7. All injuries/illnesses must be reported to your Supervisor and First Aid Attendant.
8. All ITC employees are expected to participate in the ITC Injury Management Program.
9. Never work alone or in isolated areas unless arrangements have been made for periodic checks with another person. (*See ITC Conduct Polices*)
10. No worker shall steal any property (theft) from personnel or ITC premises.
11. Willful/negligent damage of Company's and other's property is not allowed.
12. Always maintain good housekeeping practices. Do not create or contribute to unsanitary conditions, acts or practices.
13. Cell Phones is only permitted in designated/hazard free areas. (*See ITC Conduct Polices*)
14. Smoking/Vaping/E-Cigarettes is only permitted in designated areas.
15. Insubordination, interfering with, or restricting the work of others will not be tolerated.
16. Only use equipment that you are authorized, and qualified to operate.

5.10 Site Rules

All active jobsites will have the ITC site-specific rules posted at main gated entrances, exits and other high traffic common/gathering areas (Hoist decks, Safety boards, Lunchrooms/Lockups).

Site Rules will be reviewed during site specific orientations and ongoing safety meetings (toolbox talks). Site rules may vary from project to project based on the ITC specific Project HIRA, other risk/hazard assessments conducted as well as contributing environmental conditions.

See Element 5 - Appendix for Site Signage templates for ITC projects.

5.11 Progressive Discipline Process and Non-Compliance Procedure

This progressive disciplinary process is outlined to provide a clear understanding of the how the company rules and conduct policies will be enforced. At any time, termination without notice or payment in lieu of notice where there is reason which constitutes cause. This includes but is not limited to theft of property, wilful misconduct, deliberate neglect of duties, or breach or non-compliance with company policies.

All site supervisors, workers, inspectors, suppliers, and visitors shall strictly comply with the rules, regulations, procedures, and practices required by all applicable construction safety legislation and programs in place by: Workers' Compensation Board, Building Codes, Municipal Bylaws and our companies HSE Safety Management System and Programs.

All infractions are required to be documented on the ITC Non-Compliance Record.

If there is an infraction the following disciplinary action will be taken:

ITC Progressive Discipline Process

Minor Infraction Any infraction of government or corporate rules that *does not* have the potential to cause immediate serious damage or injury.

- **1st offense** – 'Verbal' written warning (unwanted behaviour correction)
- **2nd offense** – 'Written' warning with suspension (*24 hrs/without pay*)
- **3rd offense** – 'Suspension' (*48 hrs/without pay*) or 'Termination' depending on management review.

Major Infraction Any infraction of government, corporate, or client rules or legislation that *has* potential to cause serious damage or injury.

- **1st offense** – 'Written' warning *with* 'Suspension' (*min. 24 hrs/without pay*) or 'Termination'.
- **2nd offense** - Termination and immediate supervisor disciplined

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5.12 Records Management

All completed non-compliance documentation is to be submitted to the ITC Human Resources (HR) Manager and the Safety Manager within 24 hrs of the incident/infraction.

The non-compliance record is to be reviewed and acknowledged by both the issuing supervisor and the worker before submission to HR and Safety Manager. If the worker does not accept or is unwilling to sign, note this on the Non-Compliance Record.

5.13 Communication and Training

ITCs Company Rules, Site Rules and Conduct Polices will be communicated to all relevant stakeholders. The primary delivery methods are company and site orientations, safety meetings i.e., weekly Toolbox Talks etc. Communication will be documented with attendance taken and/or direct signature acknowledgement.

ITC will ensure all supervisors and workers are knowledgeable of the Company Rules, Site Rules and Conduct Polices and will do the following:

- ➢ Provide Management support for progressive discipline and non-conformance.
- ➢ Require that Supervisors enforce use of, and compliance with, ITC rules and polices.
- ➢ A copy of the company rules, and if applicable, the site rules will be posted in high traffic areas where they are easily accessible, visible, and protected from the elements.

All Supervisors are required to be familiar with ITCs written Company Rules, Site Rules, Conduct Polices and Progressive Disciplinary Process and Non-Compliance Procedure.

All Managers will provide feedback and take corrective action(s) as required to address continued unacceptable or inappropriate professional behavior.

In the absence of a written rule for a specific concern/task the ITC site team will review the requirements and determine if there exists a need to generate one. The 'newly' developed company/site rule/policy will be sent to HR and the Safety Manager for review and approval. The approved site-specific company/site rule/policy will be presented to the Joint Health, and Safety Committee (JHSC) (next following meeting) for consideration of inclusion to the ITC's Company Rules and Conduct Polices as a corporate implemented rule/policy.

5.14 Review Process

Based on a three-year historical review cycle, the JHSC will annually schedule to conduct a review of a section of the HSE Safety Management System and applicable Programs. This review schedule is documented in the ITC HSE Program Review Index.

Additional reviews will be performed as required for site specific development. General required updates identified should be proposed to the JHSC for implementation approval to the ITC master HSE template.

Forms

E5 ITC Non-Compliance Record

Appendices

Appendix – ITC Conduct Policies
Appendix – ITC Site Signage

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Appendix – ITC HSE Supplemental Programs – ITC Trade Contractor Management

Element 6 – Personal Protective Equipment

6.1 Personal Protective Equipment

Purpose

The purpose of this policy is to outline the personal protective equipment (PPE) requirements for all personnel. ITC is committed to ensuring that every worker has the required PPE to perform their tasks.

PPE is to be considered the last line of defence and is not intended to replace engineering controls. The PPE is selected based on hazard assessments, safe work practices, safe job procedures, provincial occupational health and safety regulations (OHSR) and manufactures recommendations.

Policy

ITC is committed to working in a spirt of consultation with workers to ensure that appropriate PPE is available when required.

ITC will provide instruction on the selection, use and care of PPE. ITC will provide all specialized equipment needed for its employees to perform work tasks.

Trade contractors will ensure their workers are supplied all required PPE to perform their work tasks. They will ensure all their workers are trained in the selection, care (inspection and maintenance) and use of required PPE to safely complete their tasks.

All basic and specialized PPE will be inspected, maintained and removed from service as required by manufacture's recommendations and specifications.

6.2 Responsibilities

Employer

1. Adhere to the requirements for PPE as outlined in the OHSR & Code (WorkSafeBC, Alberta OHS).
2. Determine what basic and specialized PPE is required through hazard assessments.
3. Ensure all provided PPE meets ANSI and CSA standards and is available for use, as required.
4. Ensure accountability is assigned for the provision of required PPE to be enforced.
5. Ensure personnel are trained in the selection, use, fitting and care (inspection and maintenance) of each type of PPE they are issued/required to use. (Provide adequate training resources.)

Safety Manager

1. Ensure that the ITC PPE Policy, PPE hazard assessments, applicable PPE supplemental programs are developed, implemented and monitored at all premises.
2. Ensure that all PPE hazard assessments and programs are included in the JHSC review process.

Supervisors

1. Be knowledgeable about the scope of work under their supervision and the hazards associated with each task.
2. Participate in the selection, fitting, use and care (inspections and maintenance) of the PPE that workers are required to use.
3. *Ensure that suitable supplies of specialized PPE are available for distribution as required.*
4. Provide task specific training in the selection, use, fitting and care (inspection and maintenance) of their PPE (e.g. fitting PPE: fall protection harness, ear plugs, e.g. selection: anchor points…).
5. Ensure that workers under their direction are using all required PPE correctly (e.g. shaving to use a half mask respirator, hard hat worn correctly…).
6. Conduct a Daily Hazard Assessment (DHA) at the start of each shift or new task, and review with their workers suitable PPE controls that are to be used.
7. Ensure inspections are conducted of all basic and specialized PPE. Any identified as outdated or damaged is to be removed from service immediately and this action documented.

Workers

1. *Basic PPE (CSA footwear, CSA headwear, and general work gloves) is to be supplied by the worker.*
2. PPE will be kept in good condition and maintained according to the manufacturer's specifications.
3. PPE must conform to CSA and/or ANSI standards.
4. PPE is to be used in accordance with approved training and instruction.
5. Specialized PPE supplied to a worker must be used and maintained in accordance with manufacture's recommendations, training and instructions provided.
6. PPE is to be visually inspected before use.
7. PPE identified as 'defective' must be removed from service and reported to their supervisor.
8. PPE shall be secured from falling e.g. tethers- as part of ITC's Dropped Object Prevention policy.

Project Safety Coordinators (PSC)

1. *Ensure that suitable supplies of specialized PPE are available for distribution as required on site.*
2. Monitor that required PPE is being used correctly.
3. Ensure that damaged/defective PPE is identified and removed from service, replaced as required.
4. Ensure that trade contractors are adhering to their HSE programs, ITC's HSE Programs and other relevant federal or provincial occupational legislation, regulations and codes.

Trade Contractors

1. Must supply and maintain PPE as required by their HSE programs, ITC's HSE Programs and other relevant federal or provincial occupational legislation, regulations and codes.
2. Trade contractors are responsible for training their employees in both Basic and Specialized PPE.
3. Must ensure all PPE provided meets ANSI and CSA standards.
4. Must ensure ample supplies of required PPE is readily available and supplied to their employees.
5. Trade Contractor's employees must obtain PPE from their company/supervisor.
6. Trade Contractor's employees must use the PPE specified.
7. Trade Contractor's employees must secure their PPE from falling e.g. tethers- as part of ITC's Dropped Object Prevention policy.

Suppliers/Visitors

1. *Supply their own basic PPE (CSA footwear, CSA headwear, and general work gloves).*
2. PPE will be kept in good condition and maintained according to the manufacturer's specifications.
3. PPE must conform to CSA and/or ANSI standards.
4. PPE is to be visually inspected before use.
5. PPE shall be secured from falling e.g. tethers- as part of ITC's dropped object prevention policy.

6.3 Basic and Specialized PPE

Two types of PPE:

Basic PPE should be worn at all times by all personnel on ITC jobsites. This generally includes:

➢ CSA approved Head Protection (Hard hats)
➢ CSA approved Safety footwear (Steel-toe boots) (Absolutely NO sandals or running shoes)
➢ Appropriate clothing (long pants, sleeved shirts- 4" past the seam)
➢ Work gloves for general tasks.

Specialized PPE which is used only for specific jobs or for protection from specific hazards. This includes:

➢ CSA approved High Visibility (working on or near roadways and working with mobile equipment)
➢ CSA approved Eye and Face Protection
➢ CSA approved Hearing Protection
➢ Approved Hand Protection (i.e. Gloves for provision of First Aid or working with chemicals)
➢ CSA approved Respiratory Protection
➢ CSA approved Fall Protection Equipment
➢ CSA approved Confined Space Equipment

6.4 Basic PPE Types

Head Protection

Head Protection (Hard Hats) will be worn in any work area where there is a danger of head injury from falling, flying or thrown objects, or other harmful contacts. (Unless the worker is inside a piece of equipment or vehicle not subject to head injury or potential roll over).

Head Protection Selection and Fitting

➢ Head Protection must be non-conductive and shall meet current CSA/ANSI standards.
➢ Make sure your hat is sized and adjusted properly for a good fit.

Head Protection Inspection and Maintenance

Proper care is required. Service life is affected by many factors including temperature, chemicals, sunlight and ultraviolet radiation (welding). The usual maintenance for headgear is simply washing with a mild detergent and rinsing thoroughly.

➤ Visually inspect before each use. Check for cracks, gouges, or other signs of damage.
➤ Check that the webbing and harness is in good shape and replace it when necessary.
➤ Replace head protection that has been struck, even if no damage is visible.
➤ Do not paint the plastic shell. It could make it brittle and more susceptible to cracks.
➤ Do not put anything between the suspension and the shell.
➤ Do not drill holes, alter or modify the shell. It could reduce the protection factor.
➤ Clean the suspension and shell regularly according to the manufacturer's instructions.
➤ Remove and destroy any head protection if integrity is in doubt.

Footwear Protection

Approved Footwear is required on all jobsites or where there is mobile equipment operation. Safety footwear is designed to protect against foot hazards on the worksite. It protects against compression, puncture injuries, and impact.

Safety footwear shall be of a design, construction and material appropriate to the required protection. Safety footwear is divided into three grades, which are indicated by coloured tags and symbols. Tag colour 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.

Footwear Protection Selection and Fitting

➤ Choose safety footwear according to hazard assessment and CSA/ANSI Standards.
➤ Choose a high cut boot to provide ankle support.
➤ Rubber boots may be worn for specific tasks as long as they meet CSA/ ANSI standards.
➤ **Green Triangle** (Class 1 toe cap, puncture resistant sole) and must always be worn in work areas.

Footwear Protection Inspection and Maintenance

Safety footwear must be maintained in good condition for use.

➤ Safety footwear shall meet current CSA/ANSI standards and be in good condition.
➤ Visually inspect safety footwear protection before each use.
➤ Replace safety footwear that has openings (exposed toes), rubber boots (that let water in), sole separation, no arch support etc.
➤ Ensure to 'lace up' and tie securely; to prevent tripping hazard, or falling off.

6.5 Specialized PPE Types

High Visibility Apparel

High visibility vests are to be worn when required on the worksite and in areas with poor lighting, traffic movement (vehicles and mobile equipment) or working with cranes.

ITC personnel will be supplied the required traffic control person safety equipment as stipulated by regional legislative requirements i.e. cuffs, night wand, paddle. (*See the ITC Traffic Control Program*)

High Visibility Apparel Selection and Fitting

> ➢ Workers exposed to the hazards of vehicles traveling past shall wear high visibility apparel meeting their provincial Requirements and standards.
> ➢ Workers exposed to the hazards of mobile equipment will wear high visibility apparel meeting their provincial Requirements and standards.
> ➢ Workers engaged in welding or burning operations, the garment must be flame retardant.
> ➢ High visibility garments must be worn outside of all other clothing.

High Visibility Apparel Inspection and Maintenance

> ➢ Workers are responsible for inspecting their high visibility apparel before work starts each day.
> ➢ Specific colours or high-visibility vests may not be permitted on specific sites, i.e. federally OHS-regulated railroads, forestry operations etc.
> ➢ Clean/wash the apparel according to the manufacturer's instructions. Dirty may no longer be visible/ older may be faded etc.
> ➢ Replace if damaged or no longer vibrant/reflective.

Eye and Face Protection

Eye and/or face protection shall be worn when workers are exposed to: flying objects and particles, ultraviolet, infrared and visible radiation (welding), dust, fumes, grinding, drilling, chipping, cutting metal, splashing liquids, cleaning equipment and handling chemicals. Suitable protection equipment will be made available to each employee as required.

Eye and Face Protection Selection and Fitting

> ➢ Safety eyewear must meet the requirements of *CSA Standards.*
> ➢ A face shield must be worn for any task that could produce flying particles (grinding, chipping, blowing, burning, drilling, welding, concrete pouring, etc.)
> ➢ Additional eye and face protection may be required as noted in the SWP/SJP for the task.
> ➢ Workers must not wear contact lenses where gases, vapors, flying objects, dust or other materials are present that may harm the eyes or be absorbed by the lenses.
> ➢ Ensure eye protection fits properly (close to the face). Select eye protection that has side shields.

There are _two types_ of PPE for eye and face protection:

Basic Eye Protection includes:

➢ Eye cup goggles
➢ Mono-frame goggles and spectacles with or without side shields

Face Protection includes:

➢ Full face masks
➢ Chemical and impact resistant face shields
➢ Welders shields or helmets with specified cover

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 20/20 in either eye or is blind in either eye

Eye and Face Protection Inspection and Maintenance

➢ Workers are responsible for inspecting eye and face protection before use- ongoing.
➢ 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 is designed to deliver).

Hearing Protection

Hearing protection is designed to reduce the level of sound energy reaching the inner ear. Any noise over 85 dBA requires hearing protection. _The "Rule of Thumb" use hearing protection when you can't carry on a conversation at a normal volume of voice, when you are three (3') feet apart._

Hearing Protection Selection and Fitting

➢ Hearing Protection must meet the requirements of _CSA Standards._
➢ Use protection when the noise level at the workplace exceeds 85 decibels dBA.
➢ Ensure the hearing protectors selected provide the desired noise reduction rating.
➢ Reference the ITC hearing conservation program i.e. noise assessment, and audiometric testing.
➢ The effectiveness of hearing protection is reduced greatly if the hearing protectors do not fit properly or if they are worn only part time during periods of noise exposure.
➢ Radio headsets are not hearing protection.

Types of Hearing Protection Devices Available

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

- ➢ Ear plugs are inserted to block the ear canal. They may be pre-molded (preformed) or moldable. These are sold as disposable products or reusable plugs.
- ➢ Ear muffs consist of sound-attenuating material and soft ear cushions that fit around the ear and hard outer cups. They are held together by a head band.

Hearing Protection Inspection and Maintenance

- ➢ Follow the manufacturer's instructions
- ➢ Workers are responsible for inspecting hearing protection before use. Checking for wear and tear.
- ➢ If re-usable- Clean hearing protection daily, more often if needed.
- ➢ If re-usable- Store hearing protection in a safe, clean, dry place when not in use.
- ➢ Replace damaged and poorly fitted PPE.
- ➢ Annual hearing tests *(See the ITC Hearing Conservation Program).*

Hand Protection

The responsibility to supply specialized work gloves is the responsibility of the employer. Specialized work gloves for example, could be used for protection from working with chemicals: i.e. solvents, acids, alkaline materials, and lead. Biological hazards from cleaning contaminated tools/equipment/machinery; Potential blood pathogens during first aid treatments etc.

Hand Protection Selection and Fitting

The user shall work with their immediate supervisor in understanding hazard assessments and selection options for the protective hand protection/gloves.

The employee/the user is responsible for using the gloves as the manufacturer intended and not modify any part beyond the materials and/or gloves intended use. For example, cutting the glove fingers off keeping only protection for the palm of the hand.

Hand Protection Inspection and Maintenance

Supervisors are to monitor the use and care of the PPE issued and intervene when deemed the user is being careless and/or potentially exposing themselves to the know foreseeable hazards. Planning shifts in times of cold, heavy rains, muddy workplaces etc. the right-hand protection is important. Several pairs of protective hand wear/gloves may be needed to ensure safety and comfort.

- ➢ Workers are to care for their own purchased and supplied protective hand protection/gloves.
- ➢ Workers shall store their hand protection/gloves so it can effectively dry out.

➢ Some gloves once contaminated with a chemical or solvent cannot be safely stored for next use therefore must be properly disposed of.

➢ Do not throw gloves covered or saturated in a flammable material into a general waste bin. Such contaminated gloves must be disposed of properly as to not create another hazard.

Respiratory Protection

ITC will take all practicable reasonable measures to assess respiratory hazards, attempt to eliminate and/or control exposures meeting or exceeding measurable standards described by the Board.

Employees and trade contractors hired to perform tasks known to be potentially hazardous to the respiratory system will be provided with appropriate training and education for the hazards and required controls to safely perform their work tasks.

All workers that will use respiratory protection are required to be fit tested annually.

Respiratory Protection Selection, Fitting, Inspection and Maintenance

The ITC Respiratory Protection Program (RPP) outlines the procedure for section, fitting, inspections and care for all types of respiratory protection. Training and education requirements provided during the fit testing process is located in the ITC RPP.

Where an employee may be exposed to asbestos fibres, toxic mould, chemicals or toxic gases or fumes, approved breathing devices must be worn.

(See the ITC Respiratory Protection Program (RPP)).

Fall Protection

Where a worker has intent to work in proximity of an unguarded fall hazard, fall protection systems i.e. fall restraint or fall arrest will be utilized. Where workers are exposed to falls at and above 3 metres (10 feet) in height or when at a lesser height but are exposed to an injury hazard such as: Exposed rebar dowels; Uneven ground or surface such as earth, rocks, concrete curbs, stairs, formwork, debris, equipment such as hot kettles etc. where there is potential for greater injury than landing on a flat surface.

ITC requires all workers that may use or be exposed to fall hazards to receive formal training, regulations reviewed, CSA and applicable ANSI information effectively communicated with practical and written evaluations conducted by a recognized/approved training provider prior to working with personal fall protection equipment. Proof of valid training is required for each worker.

Trade contractors will provide their own training, education, equipment and maintain each piece in good working condition. *(See ITC Trade Contractor Management Program)*.

Fall Protection Selection, Fitting, Inspection and Maintenance

The ITC Fall Protection Program (FPP) outlines the procedure for section, fitting, inspections and care for all types of fall protection equipment. Training and education requirements are outlined in the ITC FPP.

Tool and Equipment Tethering

Tools and equipment used near leading edges where a debris netting or enclosure is not present shall be tethered to stop them from potentially going over the edge of a structure we are constructing. Additionally, have an implemented control zones in place. (*See ITC Dropped Object Prevention Program*)

Rescue Planning

ITC will assess the site-specific rescue hierarchy options available and list them in their developed site-specific fall protection plan (SSFP). Availability of high angle rescue options and worker deployed rescue systems will be developed based on site specific hazard assessments i.e. ITC's PHIRA.

Workers that are exposed to potential falls along a leading edge for heights greater than 25' feet or higher must have a self-rescue device as part of their full body harness and trained on how to deploy it.

(See the ITC Fall Protection Program (FPP)).

6.6 Communication and Training

Basic PPE training requirements will be determined upon hire and will be provided with instruction and expectations selection, fit, inspection, care and maintenance for i.e. hard hats, safety footwear and appropriate work clothing.

Specialized PPE training requirements will be determined upon hire and will be provided by approved/qualified/certified third-party providers who provide recognised training and/or certifications (i.e. fall protection, respiratory protection and fit testing).

6.7 Review Process

Based on a three-year historical review cycle, the Joint Health, and safety Committee (JHSC) will annually schedule to conduct a review of a section of the HSE Safety Management System and applicable Programs. This review schedule is documented in the HSE Review Index.

Additional reviews will be performed as required for site specific development. General required updates identified should be proposed to the JHSC for implementation approval to the ITC master HSE template.

6.8 PPE Inspection, Supply Responsibility Matrix

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ITC Construction Group
Quality Counts

PPE INSPECTION, SUPPLY RESPONSIBILITY MATRIX					
Personal Protection Equipment	**Basic or Specialized**	**Provided by:**		**Supply Intervals**	**Inspections**
		Employer	**Worker**		
Clothing -protect from elements	Basic		X	As required	Daily
Safety Footwear/Steel toe boots	Basic		X	As required	Prior to use
Head Protection/Hard Hat	Basic		X	As required	Prior to use
Hand Protection/Work Gloves	Basic		X	As required	Prior to use
Hearing Protection	Specialized	X		Daily	Prior to use
Eye Protection	Specialized	X		As required	Prior to use
Face Shield	Specialized	X		As required	Prior to use
Respiratory Protection Dust Masks (N95)	Specialized	X		Daily	Prior to use
Respiratory Protection Full Faced Masks	Specialized	X		Yearly	Prior to use
Respiratory Protection Half mask	Specialized	X		Annually	Prior to use
Respiratory Protection Cartridges for masks	Specialized	X		As required	Prior to use
Hand Protection/Special Gloves	Specialized	X		As required	Prior to use
High Visibility Vest	Specialized	X		As required	Prior to use
TCP Anklets	Specialized	X		As required	Prior to use
TCP Wristlets	Specialized	X		As required	Prior to use
TCP Stop Slow paddle	Specialized	X		Annually	Prior to use
TCP night wand	Specialized	X		Annually	Prior to use
Fall Prevention Body Harness	Specialized	X		Every 5 years	Prior to use/ Documented quarterly
Fall Prevention Fall Rope (vertical lifeline)	Specialized	X		Every 5 years	Prior to use/ Documented quarterly
Fall Prevention Rope Grab and Lanyard	Specialized	X		Every 5 years	Prior to use/ Documented quarterly
Fall Prevention Self-Re-retracting Lifeline (SRL)	Specialized	X		Every 5 years	Prior to use/ Documented quarterly
Confined Space Equipment	Specialized	X		Every 5 years	Prior to use/ Documented quarterly (when in use)

Forms

ITC Respiratory Protection Equipment Inspection Record
ITC Respiratory Protection - Fit Testing Record
ITC Fall Protection Equipment Inspection Record

Appendices

Appendix – ITC HSE Review Matrix
Appendix – ITC HSE Supplemental Programs – ITC Hearing Conservation Program
Appendix – ITC HSE Supplemental Programs – ITC Respiratory Protection Program
Appendix – ITC HSE Supplemental Programs – ITC Fall Protection Program
Appendix – ITC HSE Supplemental Programs – ITC Hearing Conservation Program
Appendix – ITC HSE Supplemental Programs – ITC Confined Space Program
Appendix – ITC HSE Supplemental Programs – ITC Traffic Control Program
Appendix – ITC HSE Supplemental Programs – ITC Dropped Object Prevention Program

Element 7 – Preventative Maintenance

7.1 Preventative Maintenance Policy

All equipment, vehicles and tools shall be properly maintained so as to reduce the risk of accidents or injuries to employees, visitors, sub-contractors, material delivery personnel and damage to property or the environment. Equipment includes mobile construction vehicles (such as cranes, forklifts, skid steers), personal protective equipment, office equipment, as well as any equipment requiring a power source or required for safety purposes. ITC requires all employees to participate and ensure that maintenance programs are adhered to.

All tools and equipment must be properly inspected and maintained at manufacturer specified intervals; this program outlines the responsibilities of those involved in our preventative maintenance program.

All tools, equipment and machines are to be kept in safe working order. Concerns regarding equipment must be reported as soon as is practical to a supervisor. If they pose a hazard they must be immediately taken out of service and tagged to avoid accidental usage.

7.2 Responsibilities

Management
- shall ensure that all preventative maintenance is carried out frequently by qualified personnel, according to manufacturer's warranty or established schedules and that records are maintained.
- shall ensure that all equipment that is purchased or rented meets or exceeds provincial occupational health and safety regulations and CSA or industry.

Supervisors
- will ensure that workers are competent to use the tools and equipment by validating training records and certifications. Additionally, they will perform ongoing observations of the worker(s) performing the task(s) and providing coaching as needed. This coaching shall be documented.
- will keep a record of all tools and equipment that are removed from service and/or set for repair.
- will visually inspect the equipment that is purchased or rented upon arrival to the job site.
- will ensure applicable operating and manufactures' manuals are available for reference.

Workers
- are not to operate equipment or machinery if they have not been adequately trained.
- will participate in all training required to tools and equipment in the way they are intended to be used, with adequate instruction and supervision to ensure their safe operation.
- must visibly inspect the vehicles, tools and equipment that they are going to be working with before and after each use, and only competent workers shall use the tools and equipment. If the tool or equipment is unsafe for use, the worker is to tag the item and promptly inform their supervisor.

Project Safety Coordinator
- will provide ITC personnel with specialized personal protective equipment to use for task identified tools and equipment as required.

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Third Party Suppliers, Service and Maintenance Providers
- will ensure that all preventive maintenance is carried out by qualified personnel based on the required maintenance schedules.
- will ensure to maintain and submit or provide adequate records upon request.

7.3 Remove from Service Process

Any tool or piece of equipment that is found to be defective or not functioning correctly during pre-use inspection is to be removed from service immediately. The item found to be defective shall be promptly tagged by using "red danger tape" or other identification tag that is highly visible and indicates the item is "Out of Service". The identification tag is to be fixed to the equipment, with a description of the damage, or problem if known. The defective item will be provided to the supervisor for disposal or repair.

7.4 Communication and Training

ITC will ensure that all employees are qualified to pre-inspect their tools, equipment and PPE. All supervisors and workers will be knowledgeable in the process for removing defective tools, and equipment from service.

All supervisors and project safety coordinators are required to be familiar with ITCs required tools, equipment and their relevant corresponding SWPs and SJPs.

The primary delivery methods are company and site orientations, safety meetings i.e. DHAs, weekly Toolbox Talks etc. Communication of hazards will be documented with attendance taken and/or direct signature acknowledgement.

7.5 General Office Equipment Maintenance

Equipment must be maintained to industry standards and in accordance with the manufacturer's instructions. The inspections of office tools and equipment will be conducted by office personnel as part of the monthly office inspection tour. The completed reports are reviewed with the office manager and the Joint Health and Safety Committee (JHSC). Completed office inspections are maintained in a binder at reception and filed on SharePoint.

Items maintained in the office include:

- Step ladder -used to access the upper shelves. It must be inspected to ensure it's safe to use.
- Ricoh copiers is rental equipment. They must be included in the monthly inventory submitted to the ITC Equipment Manager (Tech Projects) for tracking in the master equipment repair log. It should be noted that only qualified Ricoh service representatives can conduct repairs or maintenance.
- Defibrillator located in the Vancouver office kitchen on level 8 must be inspected monthly and documented on the office inspection record and the first aid inventory checklist.

7.6 General Site Equipment Maintenance

Equipment must be maintained to industry standards and in accordance with the manufacturer's instructions. To accomplish our maintenance program goals, an inventory of all major tools, equipment, machinery and vehicles will be kept maintained in a master equipment inventory repair log. It will be actively maintained by the ITC Equipment Manager (Tech Projects). The inventory will include the make, model and serial number of each item as well as the quantity and location. An identification number (sticker/tag) may be attached to the tool or equipment.

Large equipment i.e. skid steers and forklifts, requires a daily log to be maintained by the operators. The pre-operation inspection/checks must be noted daily and kept with the equipment until submitted for record keeping. The logbooks are to be submitted to the ITC Equipment Manager (Tech Projects) for archiving.

Skid steer loaders are maintained according to the terms of the rental contract maintenance program. A maintenance technician will go the project where the machine is located and provide the service. The completed maintenance records provided by the service supplier are collected at site level by the supervisor. These records will note all repairs and maintenance completed. It will also advise ITC of any further repairs or maintenance that may be required. This information is to be provided to the ITC Equipment Manager (Tech Projects) for tracking in the master equipment repair log.

Propane heaters will be inspected, tested and certified by a third-party certified gas fitter. The qualified third party will come to the ITC yard and complete the inspection and certification process. A record of repairs and certification for each heater will be added to the master equipment repair log.

Radios will be repaired, programmed and delivered to the job sites by a third-party supplier and maintained company. All repairs and programming records will be provided by the supplier to the ITC Equipment Manager (Tech Projects) and added to the master equipment repair log.

Fire extinguishers will be inspected and maintained annually by a third-party provider. ITC Equipment Manager (Tech Projects) will exchange certified fire extinguishers at the job site and pick up fire extinguishers that require recertification or hydrostatic testing. Tech Projects will deliver the fire extinguishers to the third-party supplier for maintenance. Recharged, certified extinguishers will be returned to the ITC yard for inventory identification and site distribution.

First Aid Rooms will be inspected and maintained by the project supervisor and/or the project safety coordinator. Items include: water cooler, cot, treatment chair, spine boards, first aid kits, oxygen tanks etc. Inform ITC Equipment Manager (Tech Projects) of the items serviced for inventory tracking in the master equipment repair.

7.7 Tool and Equipment Inventory

ITC's Equipment Manager (Tech Projects) will maintain a comprehensive inventory of all ITC's tools and equipment that require service or repair. A Master Equipment Repair Log will record all inventory items and a list of service conducted, maintenance scheduled and repairs completed.

Supervisors will maintain an inventory of all tool, equipment and machinery at each site using the tool and equipment checklist. The project safety coordinator will be responsible for ensuring an inventory of all safety equipment is logged and maintained as per the manufactures specifications and ITC's inventory tracking system.

7.8 Equipment Maintenance Inspection Schedule

The matrix below outlines various types of equipment and the inspection and maintenance requirements.

Equipment	Type of Inspection	Schedule	Responsibility	Record
Fire Extinguishers **(ABC, 5lb -20lb)**	Visual Inspection	Daily	Project Safety Coordinator	Inspection Sheet
	Charge status, overall condition, pressure gauge, certification tag is on extinguisher.	Monthly When use or failure occurs.		Monthly Inspection tags
	Hydrostat testing, overall condition, pressure gauge, certification tag is on extinguisher, ensure they are located in appropriate locations.	Annual inspection for certification.	Qualified ASTT fire prevention/ extinguisher technician. NFPA10 compliant recertification	Annual inspection tag Monthly inspection tag
Project Trailers **Tool Sea-Cans**	Annual inspection - each unit. Prior to demobilization a full structural inspection to ensure safe loading onto trucks for transport	Annual / Prior to moving.	Equipment Manager (Tech Projects)	Recorded on inspection form
Spill Kits **Spill Kit Barrels** **(Project & Yard)**	Spill response contents meet requirements- i.e. kitty litter, diapers, mops, pads etc., ensure they are located in appropriate locations	Monthly at yard inspection/ when use occurs.	Supervisors Project Safety Coordinator	Recorded on inspection form
Mid-sized Equipment Compressors Generators (small) Power washers Jacking equipment Lighting equipment	Complete inspection	Annually	Operator Supervisors Mechanics	Inspection Sheet Log Book
	Preventative maintenance & Pre-use inspection	Daily	Operator Supervisors Mechanics	
	Preventative maintenance (engine, fluid inspections, greasing, changing filters, oil changes, etc.)	Manufacturers	Operator Supervisors Mechanics	
	Repair or replace	As needed.	Operator Supervisors Mechanics Manufacturer/ Supplier	

Equipment	Type of Inspection	Schedule	Responsibility	Record
Trucks – 1 ton or smaller Tech Projects: delivery truck and deficiencies vehicle	Complete inspection annually	Pre-trip inspection daily, monthly, post incident.	Operator Supervisors Mechanics Safety division	Inspection Sheet Pre-trip log
	Preventative maintenance & pre- use inspection (tire pressure, body, fluid levels etc.)	Visual – Daily prior to use.	Operator Supervisors Mechanics	
	Preventative maintenance (new tires, fluid inspections, changing filters, oil changes etc.)	Manufacturers	Operator Supervisors Mechanics	
	Repair or replace	As needed.	Operator Supervisors Mechanics	
Power Tools Cut-off saws Grinders Hilti guns Impact wrenches Air powered equipment Drills Skill Saws Table saws	Complete inspection	Annually	Supervisors Project Safety Coordinator	Inspection Sheet Pre-trip log Monthly tool Equipment checklists
	Preventative maintenance & Pre-use inspection (guards, engine/controls, hoses, blades etc.)	Visual – Daily prior to use.	Supervisors Project Safety Coordinator	
	Preventative Maintenance	Manufacturers	Supervisors Project Safety Coordinator	
	Repair or replace	As needed.	Supervisors Project Safety Coordinator	
Hand Tools Shovels Screw drivers Brooms Levels Hammers Wrenches Ratchets	Complete inspection	Annually	Supervisors Project Safety Coordinator	Daily visual inspection
	Preventative Maintenance	Manufacturers	Supervisors Project Safety Coordinator	
	Repair or replace	As needed.	Supervisors Project Safety Coordinator	
Ladders Extension ladders Step ladders Folding ladders Aluminium ladders Job built ladders Ladder accessories	Pre-use inspection	Visual – Daily prior to use.	Supervisors Project Safety Coordinator	Monthly ladder Inspection checklist
	Complete inspection	Monthly Annually After modification.	Supervisors Project Safety Coordinator	
	Repair or replace	As needed.	Supervisors Project Safety Coordinator Manufacturer Supplier	

Equipment	Type of Inspection	Schedule	Responsibility	Record
Fall Protection Equipment Fall arrest systems: i.e. horizontal lifelines	Complete visual inspection	Before installing system & once system is installed, and prior to use.	Supervisors Project Safety Coordinator	PPE Inspection Sheet
	Complete inspection (testing & certification)	Annually or manufacturers recommendations, post incident.	Supervisors Project Safety Coordinator External testing, supplier	
Personal Fall Protection Equipment Retractable lanyards Fall restraint Shock absorbing lanyards Ropes Rope Grabs	Pre-use inspection (ropes, lanyards, rope grabs, temporary anchors)	Daily before use, documented inspection to be done Quarterly.	Supervisors Project Safety Coordinator	Written Fall Protection Plan Equipment inspection checklist
	Repair or replace	As needed.	Supervisors Project Safety Coordinator External repair company, Supplier/ Manufacturer	
Electrical Components Cords Extension cords Power outlets Surge protectors	Complete visual inspection	Quarterly assured grounding program inspection by coloured tape.	Supervisors Project Safety Coordinator	Inspection Sheet
	Pre-use inspection	Visual – Daily prior to use.	Supervisors Project Safety Coordinator	
	Preventative Maintenance	Manufacturers recommendations.	Supervisors Project Safety Coordinator	
	Repair or replace	As needed.	Supervisors Project Safety Coordinator External repair company	
Fuel/ Compressed Gas Storage Jerry cans Propane tanks Compressed gas Cylinder tanks Storage cans Tidy tanks Fuel tanks Fuel storage devices	Pre-use inspection	Daily Weekly Monthly	Supervisors Project Safety Coordinator	Inspection Sheet
	Preventative maintenance & pre-use inspection (hoses, nozzle, tank body etc.)	Visual – Daily prior to use.	Supervisors Project Safety Coordinator	
	Repair or replace	As needed.	Supervisors Project Safety Coordinator Mechanic, Supplier/ Manufacturer	

Equipment	Type of Inspection	Schedule	Responsibility	Record
Suspended Work Platforms **Dedicated Evacuation Platform (DEP)** *Rescue man baskets. Outrigger Decks. Garbage boxes.*	Visual Inspection	Daily Prior to use.	Supervisor Qualified crew member	Log Book Inspection Sheet NDT Inspection
	Complete Inspection	Monthly	Supervisor Qualified crew member Project Safety Coordinator	
	Complete Inspection (testing & certification)	Annually After modification or After use.	Supervisor Engineer Supplier/ Manufacturer	
	Repair or replace	As needed.	External company, Supplier/ Manufacturer	
First Aid Jump kit(s), room(s), station(s), re-stock provisions.	Visual Inspection	Prior to use. After use.	Project Safety Coordinator / First Aid Attendant	Inspection Sheet
	Complete Inspection	Monthly		
	Replenish/Replace	As needed.		
Eye Wash Stations Readily available, secure.	Visual Inspection	Prior to use.	User Project Safety Coordinator / First Aid Attendant	Inspection Sheet
	Complete Inspection	Monthly		
	Replenish/Replace	As needed. After use.		
Airhorn and or Two-Way Radio Emergency Communication Tools.	Visual Inspection	Daily Prior to use. After use.	Project Safety Coordinator	Inspection Sheet
	Complete Inspection	Weekly (Winter) Monthly (Summer)		
	Replenish/Replace	As needed. After use.		

Forms/Templates

ITC Pre-use Equipment Inspection Forms
ITC HSE Inventory / Maintenance / Repair Logs (*See Appendix ITC HSE Preventative Maintenance*).

Appendices

Appendix – ITC HSE Preventative Maintenance - Operators Manuals

Element 8 – Training and Communication

8.1 Training and Communication Policy

ITC Construction Group is committed to meeting and exceeding all legal requirements and standards set by applicable legislation. ITC management realizes that training and education of the company's employees is a vital part of our Safety Management System. Education is defined as instruction of a general nature while training is job specific. Both education and training will be provided for all employees based on their needs.

ITC will ensure that supervisory staff has the knowledge and skills to provide safety meetings, hazard identification and correction, instruct workers in safe work practices and safe job procedures, inspections and monitor ongoing requirements for safety instruction. Instruction will be provided to all employees and all employees are required to receive instruction.

Before commencing work, it is mandatory for all ITC New and/or Re-hired Employees to be provided with an ITC Corporate Orientation _and_ an ITC Site Orientation (as required/site specific).

8.2 Responsibilities

Corporate Safety Manager (CSM)
- Will assess employee activities to determine needs for specific education, training, and coaching requirements.
- Will identify knowledge gaps and ensure that employees are evaluated on an annual basis during the ITC performance review process. Knowledge gaps identified during these evaluations will be reviewed and appropriate education and training will be provided.

Project Superintendent & Safety Manager
- Will attend pre-project safety meetings, scheduled management and safety committee meetings as required.
- Will actively enforce all applicable company policies, regional and other applicable legislation.
- Will attend all health and safety education and training sessions as requested /required for ITC supervisory personnel.
- Will participate in the ITC annual performance review process.

Project Safety Coordinator (PSC)
- Will attend and conduct health and safety meetings and safety committee meetings as required.
- Will be evaluated to ensure they are continuing to improve their knowledge of the Occupational Health and Safety Legislation and Regulations. ITC will measure the PSC's with the ITC developed PSC Competency and Assessment Tool (minimum standards/expectations). A comprehensive action plan for ongoing skill development is outlined in the PSC Competency and Assessment Tool (See the Appendix for the PSC Competency Requirements). Qualified candidates are eligible for training funds to further their knowledge and learning as it relates to their job description.

Employee/Worker & Project Safety Coordinator
- Will participate in all education and training provided or offered for their job description.
- Will attend and participate in all safety meetings i.e. toolbox talks, daily hazard assessments etc.
- Will request training they consider relevant to perform their work.
- Will maintain their tickets and certifications as required for their job description.
- Will seek out their supervisor for further information, instruction or training if uncertain.
- Will participate in the ITC annual performance review process.

8.3 ITC Corporate Orientation

It is mandatory that all, regardless of age or experience, newly hired or re-hired employees, complete the ITC Corporate Orientation before commencing work.

The purpose of this orientation is to welcome a new employee and make them aware of the important things they need to know before starting work. They need to know the key people, the scope of their responsibilities, location of key safety items and enough of the Health, Safety Environmental Program to start work safely.

A member of the ITC Human Resources (HR) Management team will be responsible for conducting the ITC Corporate Orientation and filing the formal record with associated collected and validated training records. Upon completion of *all* ITC Corporate Orientations, HR will promptly inform ITC's Safety Manager for follow up and scheduling for Site Orientation (as required).

Any young or new ITC employee will be given instruction and demonstration of their task or work process and provided with a designated field partner. The filed partner will be identified on the employee orientation record.

The ITC Corporate Orientation Record must be acknowledged by both the ITC Orientation Administrator and the Employee receiving the orientation in order to be considered complete. If there is a filed partner assigned, acknowledgement of their required participation should also be noted on the orientation record.

To ensure consistent delivery of the ITC Corporate Orientation Health, Safety and Environmental (HSE) information, an ITC Orientation Checklist with applicable forms has been developed based on applicable legislation and regulations and can be found in the Appendix Training and Communication.

8.4 ITC Site Orientation

All required ITC employees and Trade Contractor workers must receive a project specific ITC Site Orientation prior the start of work (*No exceptions*). A Site Orientation is not a substitute for proper worker training. Worker education and training documentation is the sole responsibility of the worker's employer. Site Orientations are to be conducted by the employee's Supervisor and/or appointed ITC Orientation Administrator i.e. PSC.

Items that can be expected to be reviewed with all site staff includes, but is not limited to:

1. an overview of the contents of the ITC HSE Safety Management System and Programs;
2. a description of the responsibilities of management, superintendents, supervisors/foremen, trade contractors, workers, and visitors;
3. the name and contact information for the young or new worker's supervisor;
4. responsibilities including reporting unsafe conditions and the right to refuse unsafe work;
5. workplace health and safety rules;
6. hazards to which the young or new worker may be exposed, including robbery, assault or confrontation;
7. working alone or in isolation;
8. bullying, harassment and violence in the workplace;
9. personal protective equipment instruction in selection, inspection, care and use;
10. location of first aid facilities and means of summoning first aid and reporting illnesses and injuries;
11. emergency procedures;
12. instruction and demonstration of the young or new worker's work task or work process;
13. a briefing that points out hazards, dangerous areas, restricted areas, and jobs where personal protective equipment (PPE) is required;
14. WHMIS information requirements, as applicable to the young or new worker's workplace; and
15. contact information for the occupational health and safety committee or the worker health and safety representative.

Any young or new ITC employee will be given instruction and demonstration of their task or work process and provided with a designated *Field Partner*. The *Field Partner* will be identified on the employee orientation record. It should be noted that all Trade Contractors with "New & Young" workers on ITC projects are required to assign their 'New' (less than six-month relevant work experience) or 'Young Worker' (under 25) with a qualified *Field Partner* (identified on their orientation record with a contact number).

The ITC Site Orientation is followed with a written 'quiz' to demonstrate an understanding and retention of the content reviewed for the project safety requirements. All answers are to be correct. The ITC Orientation administrator will review quizzes for completeness and correctness, providing expectations for incorrect answers in a review with the worker.

The Site Orientation Record must be acknowledged by both the ITC Orientation Administrator and the Employee/ Trade Contractor/ Worker receiving the orientation in order to be considered complete. If there is a filed partner assigned, acknowledgement of their required participation should also be noted on the orientation record.

A member of the ITC Site Management team i.e. PSC, will be responsible for conducting the ITC Site Orientation and filing the formal record with associated collected and validated training records in the onsite ITC Binder system.

To ensure consistent delivery of the ITC Site Orientation Health, Safety and Environmental (HSE) information, an ITC Orientation Checklist with applicable forms has been developed based on applicable legislation and regulations and can be found in the Appendix Training and Communication.

8.5 Mandatory and Job Specific Training

The effectiveness of the HSE program will be monitored by the Corporate Safety Manager (CSM) for the purpose of identifying health and safety problems that are not addressed by occupational health and safety required programs. When areas of concern are identified by ANY employees or manager, consideration will be given to the provision of a training program. All training will be carried out by qualified and competent persons or by an approved third-party provider as required.

ITC Safety Administration Team will maintain an active log of employee certifications in a Training Matrix on SharePoint.

Mandatory training for all ITC Employees includes:

- ITC Corporate Orientation
- ITC Site Orientation (as required)
- Workplace Hazardous Materials Information System (WHMIS) / Global Harmonized System (GHS)
- Personal Protective Equipment (PPE)
- BC Site Ready (includes WHMIS and PPE)

ITC will provide ongoing additional training for employees involved in special tasks. This training must be documented on the Employee Training Record.

Mandatory training for all ITC Supervisory Personnel includes:

- Supervising for Safety – WorkSafeBC Online and/or
- Leadership for Safety Excellence (BCCSA) (2 day) or equivalent

Job Specific Training for ITC Employees includes:

- Site-specific safety requirements
- Emergency procedures for harmful substances
- Hazards of Workplace Hazardous Materials Information System (WHMIS) controlled products
- Content of WHMIS labels and Safety Data Sheets (SDS) materials
- Safe use, handling, storage and disposal of harmful substances
- Recognizing the symptoms of heat disorder
- Using respiratory protection
- Electrical safety
- Lock-out of machinery and equipment such as electrical, steam, or pressurized water systems
- Use of powder actuated tools
- Operation of mobile equipment such as forklifts and scissor lifts
- Fall protection systems

The following identifies levels of safety training available by position within the organization:

Project Manager Safety Training
- Supervising for Safety – WorkSafeBC Online
- Leadership for Safety Excellence (2 day) or equivalent
- Completion of the NCSO program through the BCCSA or equivalent
- Joint Health and Safety Committee
- Mental Health Awareness

Project Superintendent Safety Training
- Supervising for Safety – WorkSafeBC Online
- Leadership for Safety Excellence (2 day) or equivalent
- Completion of the NCSO program through the BCCSA or equivalent
- First Aid, Standard Level/OFA1
- Fall Protection End user
- Workplace Inspections
- Investigations and Reporting
- Joint Health and Safety Committee
- Mental Health Awareness

Supervisor/Foreman Safety Training
- Supervising for Safety – WorkSafeBC Online
- Leadership for Safety Excellence (2 day) or equivalent
- Completion of the PSC / NPSC program
- Site-specific safety orientation
- First Aid, Standard Level/ OFA1
- Fall Protection End user
- Powered Equipment Platforms i.e., Scissor lift, Boom lift, as required
- Blood borne pathogens
- Workplace Inspections
- Investigations and Reporting
- Joint Health and Safety Committee
- Mental Health Awareness

Project Safety Coordinator (PSC)
- Completion of the NCSO program through the BCCSA or equivalent
- First Aid, Advanced Level/OFA Level 2 or 3
- Fall Protection End user
- Supervising for Safety – WorkSafeBC Online
- Leadership for Safety Excellence (2 day) or equivalent
- Powered Equipment Platforms i.e., Scissor lift, Boom lift, as required
- Blood borne pathogens
- Joint Health and Safety Committee
- Mental Health Awareness

Employee/Worker Safety Training
- BC Site Ready
- Forklift/ Skid Steer
- Fall Protection - End user, as required
- Powered Equipment Platforms i.e., Scissor lift, Boom lift, as required
- First Aid (as required)
- Workplace Inspections
- Investigations and Reporting
- Joint Health and Safety Committee
- Mental Health Awareness

Follow-Up on Training
Supervisors will observe workers in their area of responsibility in order to ensure safe job procedures are being followed. Workers are to receive additional education and training as identified/required. ITC will keep a record of the provision of identified training. Certain types of training must be renewed on an ongoing basis as per provincial / territorial legislation and regulations. For example, but not limited to:

- WHMIS training (1 year expiry)
- Transportation of Dangerous Goods (TDG) training (3-year expiry)
- Forklift and aerial platform training (3-year expiry)
- Fall protection training (3-year expiry)
- First aid training (3-year expiry)
- Other specialized training

8.6 Types of Safety Meetings

Quarterly Board of Directors *-Documented, Agenda and Meeting Minutes*
The ITC board of directors meets with senior management each quarter. A safety statistical summary prepared by the Corporate Safety Manager is reviewed and discussed (Including: active projects, worker injuries, WorkSafeBC reports, review of incidents and near miss occurrences).

Quarterly PSC Meetings *-Documented, Agenda and Meeting Minutes*
Discuss current issues, and to plan future actions. Education and training may be incorporated into these meetings as required. The PSC Competency and Assessment Tool will be used to identify and prioritize training needs.

Monthly Aligning the Team Meeting *–Documented Meeting Minutes*
Topics discussed include, emergency response plans, environmental management plans, hazard assessments and corrective action logs, incidents/ investigations, site and equipment inspections, WSBC inspection Reports, industry-related workplace accidents, refresher training including review of safe work practices and Job procedures, new safety initiatives, etc. *Note: No meetings in December and January.*

Weekly Toolbox Meetings (On site) *- Documented Meeting Minutes*
The supervisor (ITC and the Trade Contractor) will conduct a toolbox talk with their crew to review a best practice, safe job procedure, discuss a specific safety issue or topic etc. A record of these toolbox meetings

will be provided to the designated PSC, as directed during the ITC Site Orientation for tracking and record keeping.

Weekly Trade Contractor Coordination Meetings - *Documented Meeting Minutes*
Project Superintendent facilitated. Project Manager develops meeting minutes for distribution. The designated PSC will participate in the Meeting. Collect relevant information about the upcoming tasks and activities on site. They will assist with overall project safety coordination of planned trade activity and provide safety information, education and training as required.

Stand Down Meetings (As required) - *Documented Meeting Minutes*
Will be held as required after certain occurrences. For example: after a serious accident/incident.

8.7 Records Management

The Safety Administrator shall ensure documentation of all communication and training is kept organized and readily available on SharePoint in their designated project tree locations.

Forms

ITC Orientation Checklist
ITC Corporate Orientation Record
ITC Site Orientation Record
ITC Supervisor Orientation Record

Appendices

Appendix – ITC HSE Review Index
Appendix – ITC HSE Training and Orientation
Appendix – ITC Employee Training Matrix
Appendix – ITC HSE Supplemental Programs – ITC Injury Management Program

Element 9- Inspections

9.1 Inspection Policy

ITC is committed to ensuring that every worker is provided a safe and healthy work environment. The purpose of workplace inspections is to monitor conditions and identify potentially hazardous situations to eliminate or control. Inspections will include all work areas, tools, equipment, job sites, buildings, temporary structures, excavations, machinery, safe work practices, safe job procedures and work processes. With effective monitoring and corrective actions implemented efficiently our goal is to prevent unsafe environments that could result in worker injury or property loss.

These inspections will identify both unsafe conditions and unsafe acts. During an inspection, any observed condition or unsafe procedure or act that is a serious hazard shall be acted on immediately. The Supervisor or designate must be promptly informed.

9.2 Definitions

"**Corrective Action**" actions taken to control a hazard to prevent / reduce a worker's risk to injury or harm.

"**Formal Inspections**" follow a written format with documentation of the results and corrective actions.

"**Informal Inspections**" do not follow a pre-defined plan and have no written format. Results of these inspections do not need to be documented, but where hazards and deficiencies are found they must be corrected, controlled, and reported.

"**Special Inspections**" are inspections performed after a serious incident occurs. These inspections are done in a formal written format with documentation of the inspection results and corrective actions.

9.3 Inspection Process

The inspector will have a working knowledge of:
- The Project Health and Safety Plan and the ITC HSE Programs
- The applicable Regulations and Legislation requirements
- The potential hazards in the performance of those work tasks and the required PPE

Key points on any Inspection tour should include:
- Any hazardous or potentially hazardous conditions and procedures
- Evaluation of previous repairs and modifications
- Consultation with Workers and Supervisors
- Record all unsafe acts and conditions
- Setting priority assignment for each unsafe act and condition with corrective action follow-up dates
- Assign a person responsible for each corrective action and a target date/time for completion
- Review the inspection report with all employees at safety meetings and post on the safety board
- Determination of the need for the assistance of outside specialists, for example--occupational health and safety consultants, consulting engineers, testing agencies, or representatives of the WorkSafeBC.

Setting a Priority Assignment - Ranking and Degrees of Severity

During the inspection, if a serious hazard that poses an immediate possibility of injury is discovered, take corrective action immediately. In most cases work in the area must stop immediately until the hazard is corrected. All hazards must be documented. They must be followed up with a Corrective Action (recommendation) and the Elimination or Control (resolution), in writing with the date/time of control effectively implemented. All identified hazards should be rated by a degree of severity, high, moderate, or low.

Degrees of Severity:

HIGH	*– Stop work. Immediate corrective action required.*
MODERATE	*– Identified corrective action is required by the end of the shift*
LOW	*– Corrective actions and/or follow-up is required as noted the report.*

HIGH the observation has identified the potential for permanent disability, loss of life or body part, and/or extensive loss of structure, equipment, material or environmental damage and Immediate corrective action is required.

MODERATE the observation has the potential for serious injury or property damage that is disruptive to production, process, or environmental damage, but less severe than a high hazard, prompt corrective action is required (i.e. before the end of shift).

LOW has the potential for minor injury, occupational illness, non-disruptive property or environmental damage, but much less severe than a moderate hazard. Corrective actions and/or follow-up activities required are to be identified on the Inspection report (i.e. to be completed within 48hours- completion to be confirmed with follow up as noted on the report).

Corrective Actions / Follow-Up for Inspections

Where unsafe acts, conditions, practices or procedures are noted:
- Act immediately to correct the problem.
- Place warning signs and barricades to keep workers away. Use verbal warnings if applicable.
- Record conditions, actions taken and the time/date on the inspection report.
- Identify items that have been completed/closed by noting the time/date of observed completion and placing initials beside the item completed.

When a worker is noted performing an unsafe act, advise and perform coaching as follows:
- Inform them of the unsafe situation and discuss the unsafe condition with them
- Advise them on how to correct the unsafe condition
- Follow up to ensure the practice/procedure is being followed as directed
- Document that this process has occurred, note the result(s), and inform the appropriate personnel. *Note: If this is a repeat occurrence document using the ITC Non-Compliance Form.*

9.4 Frequency of Inspections

INFORMAL INSPECTIONS

FREQUENCY	AREA	INSPECTOR
EVERYONE IS INSPECTING ALL DAY, EVERYDAY, ONGOING.	Public Safety	Workers / All
	Site Safety	Workers / All
	Work Area	Workers / All
	Materials, Equipment, Tools and PPE	Users

FORMAL INSPECTIONS

FREQUENCY	AREA	RECORD	INSPECTOR	REVIEWER
DAILY	Public Safety AM- Morning *Before 10am*	Daily Public Safety Inspection	PSC	Project Supervisor
	Public Safety PM- Afternoon	Daily Public Safety Inspection	PSC	Project Supervisor
	Site Safety AM- Morning *Before 10am*	Daily Site Safety Inspection	PSC	Project Supervisor
	Site Safety PM- Afternoon	Daily Site Safety Inspection	PSC	Project Supervisor
	Equipment i.e. hoist, forklift…	Pre-Use Inspection	Users	PSC and/or Supervisor
MONTHLY	Site	Site Inspection	Project Superintendent	Project Manager and RSM
	All locations *Min. of (5) per month.*	All Types	SAFETY MANAGER or Designated	Project Manager and CSM
	Site *Prior to meeting.*	Site Inspection	Site Safety Committee	PSC and RSM
QUARTERLY	ITC Yard	Yard Inspection	SAFETY MANAGER or Designated	Senior Management
	Vancouver Office	Office Inspection	JHSC	RSM
	Coquitlam Office	Office Inspection	JHSC	RSM

ITC Corporate Office
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9.5 Communication and Training

Inspection results must always be communicated with workers in the workplace. Management and health and safety representatives will communicate the results of their own inspections to relevant supervisors and workers after each inspection. The results of these inspections will also be conspicuously posted on the safety boards.

Inspectors will be provided with appropriate training to perform workplace inspections. This training will be tracked in our training matrix. Periodic re-freshers in how to perform inspection will be provided i.e. toolbox talks.

9.6 Review Process

Review of inspection documentation will be indicated with a signature on the report or summary. All formal inspections must be reviewed for completeness, quality and to ensure that all corrective items have been closed. The assigned reviewer must follow up and close out all items noted on the inspection the report prior to signing to acknowledge their review.

The PSC will compile the inspection reports monthly for their project and submit to the package to the SAFETY MANAGER for review.

The collected statistical data will be provided to the CSM who will generate a summary report to be reviewed quarterly in by senior management and the Joint Health, and Safety Committee (JHSC).

The JHSC will review the summary data to identify trends and mitigation controls for management approval.

Forms

ITC Daily Public Inspection
ITC Site Safety Inspection
ITC Workplace Inspection

Appendices

Appendix – ITC HSE Inspection Forms

Element 10 – Investigations and Reporting

10.1 Investigation and Reporting Policy and Purpose

ITC Construction Group is committed to meeting and exceeding all legal requirements and standards set by applicable legislation. We will take all reasonable steps to ensure a safe working environment. ITC will investigate all types of accidents, incidents, near miss, property damage, injuries, illnesses and bullying, harassment and violence occurrences. Investigation objectives are to ultimately determine the root cause or causes, and to make recommendations to prevent the occurrence of similar incidents.

The purpose of this policy is to outline the investigative requirements for all types of incidents, in order to determine what corrective actions should be implemented to prevent recurrence. ITC will immediately investigate bullying, harassment, violence in the workplace; and instances where a worker has invoked their right to reuse unsafe work. Our goal is to determine and implement effective corrective actions to prevent incident recurrence.

10.2 Responsibilities

Corporate Safety Manager (CSM)
- Ensure staff member(s) conducting any investigation has received adequate training to do so.
- Ensure compliance with the legal requirements are followed as set out in legislation.
- Reviews cause(s) of incident(s) and corrective action(s) implemented for data analysis, and trend identification.
- Submits or designates the submission of completed Investigation Reports to appropriate Board authority as required i.e. WorkSafeBC /AB OHS.
- Oversee employee claims management.

Construction Manager/Project Manager
- Will participate in investigations i.e. gathering information, analyzing the information gathered, and identifying any corrective actions necessary to prevent recurrence of similar incidents.
- Will make recommendations for solutions or measures to address identified issues /concerns.
- Will act as a resource and assist in implementation of controls as required.
- Will review completed reports to identify improvements, corrective action or alternate initiatives.
- Will review final Investigation Reports for completion and corrective actions. Project Manager to follow up, and ensure that the identified corrective actions have been effective.
- Will review cause(s) of incident(s) and corrective action(s) implemented for data analysis, and trend identification.

Project Superintendent
- Must ensure the scene is secured.
- Will ensure the preliminary investigation is completed within 48 hours of incident occurrence.
- Must ensure the ITC Investigation Report has been completed (as required), with the assistance of the Project Safety Coordinator (PSC) and the worker(s) reporting the condition/incident.
- To advise other workers of the applicable hazards- as required during the investigation.
- To ensure that all the corrective action(s) are completed.

- To ensure that copies of the report are distributed to the Safety Manager, and JHSC Co-chairs.

Project Safety Coordinator (PSC)
- Promptly secure the scene and inform the Safety Manager.
- Collect Witness Statements, and Investigation Reports from ITC's Trade Contractors.
- Complete the ITC Investigation Report as designated by the Superintendent.
- Follow-up with the supervisor and/or worker to ensure that all actions have been completed.
- Review completed reports to identify improvements, corrective action or alternate initiatives.
- Ensure Investigation Reports are completed with supplemental information, and documentation of completed corrective actions prior to submission to the Safety Manager for management review.

Worker
- Will report all accident/incidents and near misses to their direct supervisor
- Will assist with securing the scene as required.
- Will assist the supervisor with completing the Investigation Report.

Safety Manager
- Review final Investigation Reports for completion and corrective actions. Safety Manager is to ensure that the identified corrective actions have been effectively implemented and have the supporting documentation.
- Coordinates all Investigation Report and responses to authority/Board.
- As directed by the CSM, sends or directs the sending of investigation reports to authority/Board.
- Shall ensure documentation of all communication and training is kept in the PSCs on site office.

Site Trade Safety Committee
- The Site Trade Safety Committee members are to participate in the investigation process lead by the ITC site management team.

Joint Health and Safety Committee (JHSC)
- Will participate in investigations i.e. gathering information, analyzing the information gathered, and identifying any corrective actions necessary to prevent recurrence of similar incidents.
- Will make recommendations for solutions or measures to address identified issues /concerns.
- Will act as a resource and assist in implementation of controls as required.
- Will actively review completed investigation reports to determine if corrective actions have been implemented/completed and decide is follow up is required.

Trade Contractor
- Trade Contractors are required to fully participate in the investigation process, including completing their own full written investigations, as per the provincial regulations and existing ITC policies, procedures and HSE programs. *See the ITC Trade Contractor Management Program.*

10.3 Reporting Protocols

All workers and trade contractors shall report all types of accidents, incidents, property damage, bullying, harassment, violence no matter how small or incidental it may seem to their appointed supervisor. The supervisor shall ensure appropriate corrective actions are promptly taken.

The supervisor shall immediately report all accidents and incidents to the Project Superintendent or designate and the Project Safety Coordinator (PSC).

External Reporting
All legislative and regulatory requirements for conducting investigations and applicable reporting requirements to the Board will be adhered to.

All Investigations are to be documented on the ITC Investigation Report forms. Investigations shall include members of the site Trades Safety Committee and/or the ITC Joint Health and Safety Committee (JHSC) if available and/or required**.**

Completed ITC Investigation Reports are to be reviewed and signed by the Project Superintendent prior to submission to ITC Safety Manager. Depending on the severity of incident, the Safety Manager will submit the completed report to ITC Corporate Safety Manager (CSM) for review and submission to the applicable Board authority. ITC Investigation Reports will only be submitted to Board Authorities by the Safety Manager or the CSM.

Internal Reporting Hazards, Equipment Loss, Property Damage and Near Misses

1. Any worker recognizing/involved will immediately report to their Supervisor, and describe the hazard/incident and if possible, the outcome.
2. The Supervisor will record the hazard/incident information, on the ITC Investigation Report.
3. The Supervisor will notify other workers of the hazard. (In person or through warning signs).
4. If possible, the Supervisor shall correct the hazard in a safe manner.
5. Where the correction of the hazard is beyond the span of control of the Supervisor (site), they shall promptly contact by phone Safety Manager for direction.
6. Management shall take all necessary steps to correct the hazard and file a completed Investigation Report noting corrective actions taken.
7. General hazards are to be noted on the Daily Hazard Assessment and Equipment Inspection form.

Internal Reporting Injuries and Illnesses
A worker who sustains an injury or becomes ill as a result of workplace conditions or work activities must report the injury or illness to a supervisor immediately and obtain first aid treatment.

If, because of the nature of the injury or illness, a worker is unable to report, it is the responsibility of another worker, who happens to see the incapacitated worker, to immediately report the event to a supervisor. *Reference HSE Element 11 - Emergency Planning and Response for more First Aid information.*

Injuries resulting in <u>Medical Aid</u> must be promptly investigated by the injured workers appointed supervisor. The supervisor must inform the PSC, Project Superintendent or designate and the Safety Manager within one (1) hour of the occurrence. If the injured worker is an ITC employee notification of

injury must also be made to the ITC Injury Management Coordinator. See the *ITC Injury Management Program* located in ITC Supplemental Programs.

Internal Reporting and Investigation Procedures

➢ **Bullying, Harassment and Violence in the Workplace**
See the *Bullying, Harassment and Violence Procedure*s located in the ITC HSE Appendices, under ITC Investigations and Reporting.

➢ **Unsafe Work Refusal**
See the *Unsafe Work Refusal Procedure*s located in the ITC HSE Appendices, under ITC Investigations and Reporting.

➢ **Impairment in the Workplace**
See the *Impairment in the Workplace Procedure*s located in the ITC HSE Appendices, under ITC Conduct Policies.

In the event of critical stress situations, ITC will make counselling available for any ITC employee as per the Employee Assistance Program. In addition, departments may provide on-site counselling after serious incidents on site.

10.4 Investigations

Immediate Notice to Provincial Regulatory Authority (Board) Required
ITC will immediately report to the appropriate Board authority, the following occurrences:

1. Serious injury to a worker or a worker's death
2. Major structural failure or collapse (building, bridge, tower, crane, hoist, derrick, or temporary construction support system or excavation)
3. Major release of hazardous substances
4. Involved a fire or explosion that had a potential for causing serious injury to a worker

Investigation Reports required by Board Authorities will be conducted as outlined below:

(1) Preliminary Investigation Report-**submit within 48hours**
(2) Interim Corrective Action Report
(3) Full Investigation Report-**submit within 30 days of the incident**
(4) Full Corrective Action Report.

ITC will promptly investigate and report to the Board as required, the following but not limited to:

• Injury requiring medical treatment
• Minor injury, or no injury, but had the potential for causing serious injury
• Incidents that involve members of the public
• Occupational disease which developed on the work site

- Environmental damage on the work site or the surrounding area
- Significant property and/or Equipment damage
- Incidents that involve more than one (1) Trade Contractor on site
- Reports of Unsafe Work
- Reports of Impairment
- Reports of Bullying, Harassment (all types) and Violence
- Trending in first aid or medical aid injuries

Conducting Investigations

The investigation team shall include the Project Superintendent and the PSC who are trained to conduct investigations. They will also include on their team (when possible) someone who has knowledge of the type of work involved; including the direct supervisor for the work; and a worker familiar with the work activity. When possible, a representative of the ITC Joint Health and Safety Committee (JHSC) will also participate in the Investigation process. Ultimately, their collective goal is to determine the cause or causes of the accident; identify any unsafe conditions, acts or procedures which contributed to the accident; and to develop appropriate corrective action to prevent similar accidents.

Securing the Scene of Accident

It is paramount that the scene of an accident be preserved. All workers, superintendents, on site supervisors and PSCs are to work together to ensure that this occurs. Use barrier tape or other signage to identify the area and wait for further instruction.

Identification and separation of workers involved, and witnesses is crucial for the integrity of the information gathered. Statements are to be taken within one hour of the occurrence. *Where witnesses are allowed to converse, their recollection of the events may change.*

General Investigation Procedure

Investigation team will:

1. Secure the scene, pending further investigation by local Municipal Police or Board authority
2. Notify site management team and the Safety Manager
3. Consider the pre-accident situation
4. Evaluate the immediate accident situation
5. Consider the post-accident stage
6. Collect all relevant information: sketch and photograph scene, take measurements etc.
7. Immediately get names and contact information for witnesses
8. Interview the witnesses and others who can contribute to the investigation
9. Gather written statements **before the witnesses leave work for the day**
10. Complete the Investigation Report

Writing the Investigation Report

A preliminary Investigation Report is to be completed by the PSC and reviewed by the Project Superintendent. Every effort will be made to ensure that the injured worker's immediate supervisor, and a health and safety representative is involved in the investigation (if practical).

All Investigation Reports and witness statements should be completed on formal ITC Investigation Report forms. The investigators are to be mindful of privacy of individuals involved in the incident- record only personal information relevant to the investigation.

The completed preliminary Investigation Report must be submitted to the ITC Project Manager and Safety Manager for review by the end shift (unless otherwise instructed by the Safety Manager. This preliminary Investigation Report is expected to have identified the interim Corrective Actions that have been taken/ put in place.

The final Investigation Report must be submitted to the ITC Project Manager and Safety Manager for review and direction as determined in the preliminary Investigation Report. The Safety Manager is to submit final Investigation Report to the CSM for review and further direction.

The Corrective Action Report with supporting documentation, to demonstrate effective implementation of all identified corrective actions, must be submitted to the ITC Project Manager and Safety Manager for review and further direction. The Safety Manager will submit the final, completed Corrective Action Report to the CSM for review and further direction (i.e., Submission to the Board).

10.5 Training and Communication

The employer shall ensure that all workers of ITC receive an Orientation including the requirements of this procedure prior to starting work for ITC.

Annually, all workers shall receive refresher communication of this policy and procedure through Toolbox Talks and other Safety Meetings.

All personnel assigned to perform investigations will receive appropriate training and education to perform their roles.

HSE Administrators shall ensure documentation of all communication and training is kept in the head office and filed on SharePoint.

The investigation results will be posted on the ITC Safety Notice Boards. When appropriate, the names of those involved will be excluded from the posted report.

The JHSC will be provided copies of the completed investigation reports for review and follow up of implemented corrective actions.

The JHSC will also actively review the complied data and statistics to identify trends. JHSC will develop recommendations to reduce incidents and accidents.

Forms

ITC Investigation Report
ITC Witness Statement
ITC Corrective Action Plan
<mark>*ITC Corrective Action Plan   ***Spreadsheet** live active for each site—like google calendar share…*</mark>

Appendices

Appendix – ITC HSE Review Index
Appendix – ITC HSE Investigations and Reporting Procedures
Appendix – ITC HSE Investigations and Reporting Forms
Appendix – ITC HSE Supplemental Programs – ITC Trade Contractor Management Program

Element 11- Emergency Planning and Response

11.1 Emergency Planning and Response Purpose

All organizations need a practical emergency plan to minimize injuries and property damage that may result from accidents and emergencies, including personal injuries, fire, explosion, toxic chemical spills, gas leaks and natural disasters. Emergency plans are based on the best available information about possible emergencies and their potential for personal injury and property damage. This information serves as the basis for drafting procedures, assigning responsibilities, acquiring necessary equipment, and providing the training needed to respond effectively and quickly to any emergency.

Emergencies can create a variety of hazards for workers in the impacted area. Preparing before an emergency incident plays a vital role in ensuring that employers and workers have the necessary equipment, know where to go, and know how to keep themselves safe when an emergency occurs. These Emergency Response Plans (ERP) provide information on how to prepare and train for emergencies and the hazards to be aware of when an emergency occurs. The ERPs provide information for personnel who will be responding to the emergency.

11.2 Emergency Planning and Response Policy

Emergency Planning and Response is essential to protect health, lives, property and the environment. The developed emergency plans outline actions that management and employees must take in the event of an emergency situation to ensure employee, worker and public safety and to minimize property damage.

An emergency plan will be specifically fitted to each workplace location. It will include ways of managing all potential emergencies that can occur. The plan will clearly outline the procedures to be followed in the event of an emergency. All relevant stakeholders will receive training as required by their workplace location in their roles and responsibilities during emergency situations.

11.3 Cornerstones of an Emergency Response

Prevention
Asking, "What is the worst thing that could happen?" provides a solid foundation for site-specific risk assessments and emergency response plans.

Planning
After identifying the worst-case scenarios, the next step is to develop an ERP that can help organize the overall emergency response strategy for that location and type of work.

Training
Employees are the front lines when dealing with an emergency. Employees have the experience and valuable insight about potential hazards and how to improve emergency plans. Ensure to include your employees in the planning phase of ERPs.

After developing the ERP, ITC will train employees to follow the procedures specified therein. This will include the evacuation process, the use of emergency equipment, the location of first-aid supplies and emergency provisions, and the contact details of key individuals and emergency response teams.

ITC will also regularly hold meetings about Emergency Planning and Response Plans. These training sessions will be reinforced with practice drills and emergency response simulations to ensure the site is well-prepared.

Responding and Recovering

When emergencies occur, your first priority is to ensure the safety of your personnel and the public. Recovery policies and procedures allow the organization to recover quickly and be back in operation with as little disruption as possible. The aim of continuity planning is to establish the critical functions of your business operations with minimal disruption and financial impact.

In order to bring business back to normal, adequate resources are required. These resources are your employees, equipment, and supplies that can provide a foundation for you. Identify and prioritize the resources that you need to re-establish your core business operations, and ensure their availability.

11.4 Responsibilities

The Corporate Safety Manager (CSM) **will:**

- ensure an Emergency Risk Assessment and Recovery Plan is in place.
- perform Emergency Capability Assessment.
- ensure the required resources are available to execute the ERPs
- contact provincial authorities and outside agencies as required.
- inform appropriate personnel in corporate of the emergency occurrence.

The Safety Manager will:

- ensure that all ITC workplaces have a specific emergency plan in place.
- provide emergency response information and training for office and shop/yard staff.
- ensure that the formal first aid assessment is completed for all active locations and that the correct provision/level of first aid is available as required.
- contact the provincial authority having jurisdiction and outside agencies as required.
- inform appropriate personnel in corporate, other site offices of the emergency occurrence.
- conduct investigation of emergency occurrence.

The Project Superintendent / Office Manager *(Emergency Team Leader)* **will:**

- direct activities during an emergency including communication and allocation of personnel.
- contact 911 emergency response or delegate as required.
- ensure access is restricted and the area where incident occurred is secure.
- evaluates potential for secondary incident.
- accounts for all personnel.
- follow the ERPs protocols.

- assist in gathering witness statements and completing the investigation report.
- recruit engineer to review emergency occurrence, as required.

The Project Safety Coordinator (PSC) **/ Office Assistant** *(Emergency Coordinator)* **will:**

- acquire headcount of all persons (including trade contractors / visitors).
- ensure that appropriate emergency personnel are contacted.
- help direct emergency personnel.
- plan, conduct and document annual medical, fire, and evacuation drills.
- will post up to date ERPs and ensure readily they are available to personnel for review.
- ensure the fire safety equipment is inspected monthly and maintained as required.
- assist in gathering witness statements.
- assist authorities (provincial authorities, coroner, medical examiner, police, crisis counsellor).

The Workers / First Aid Attendants will:

- if qualified and authorized, provide first aid, as required.
- participate in emergency response training as part of their ITC Orientation.
- summon help in the event of an emergency (as required).
- safely proceed to the muster area (as required in an evacuation), and remaining there until being given instruction otherwise.

The Visitors will:

- be made aware of the emergency response protocols as part of their ITC Orientation.
- follow directions as given.
- report to their host for a head count in an emergency evacuation.

The Emergency Response Team

The assignment of roles, responsibilities, and duties for members of the emergency response team will be outlined in specific communicated and posted ERPs. Key roles to be identified include:

Lead Emergency Responder: designated to implement and maintain the fire safety and emergency plans.

Emergency Response Coordinator: designated to assist the *Lead* or fulfil their duties in their absence.

Emergency Warden(s): designated to manage the evacuation of personnel from their area/ floor during a fire or other emergency.

On our construction sites the Project Superintendent will act as the *Emergency Lead Responder.* The Project Safety Coordinator will act as the *Emergency Response Coordinator*. Foreman/Lead Hands will fulfil the role of Emergency Warden(s).

In our office locations the Office Manager will act as the *Emergency Team Leader*. The Office Assistant will act as the *Emergency Coordinator.*

11.5 Emergency Planning and Response Assessment

Assess the Risk PERFORM a comprehensive *Emergency Planning and Response Assessment* for all your operations / workplace locations. For each identified scenario:

➢ DETERMINE the types of potential and actual hazards.
➢ ESTIMATE the *probability* of the event occurring.
➢ ESTIMATE the number of people likely to be exposed.
➢ ESTIMATE the *consequences* of losses arising out of the event (potential emergencies).

Then evaluate each scenario for their <u>*Probability*</u> *and* <u>*Consequence*</u> to establish a priority ranking. Extreme, High, and Medium ranked risks need preventive measures.

Identify Preventive Measures (Controls). REVIEW which preventive measures are currently in place that reduce the risk.

IMPLEMENT **Additional Measures** (Controls) that can reduce the risk even more. Although the risk may be reduced significantly in this manner, it is important to note that the event could still occur and there is a need to implement an emergency response plan.

Assess Capabilities and Resources
The *Emergency Planning and Response Assessment* identifies the consequence of a possible emergency, the *Capability Assessment* determines where the resources to manage an event will come from and ITC's capability to respond to emergencies. It is important to note that resources and capabilities must be assessed in relation to the potential of loss.

Assess resource requirements for the emergency response plans, considering:

➢ *types of resources that will be needed;*
➢ *level of resources required for an effective response; and*
➢ *resources currently available (*Emergency Response Plans are written based on current resources and capabilities*).*

Effective emergency response plans require a clear identification of factors that may contribute to emergencies; types of potential emergencies; consequences of emergencies, capability to respond to those emergencies, resource allocation/availability to manage emergencies (at all worksite locations); and risk assessment.

Types of emergencies that require an emergency preparedness assessment include (not limited to):

• Work at High Angles
• Confined Spaces or Risk of Entrapment
• Hazardous Substances
• Underground Work
• Work on or Over Water
• Workplaces where there are persons who require physical assistance to be moved

The *Emergency Planning and Response Assessment* uses a measurement of the <u>*Probability and Consequence*</u> of an adverse event/effect to health, public, property, or the environment.

Please note: that the *Emergency Planning and Response Assessment* formula (Probability x Consequence) is different that than ITC's hazard assessment formula (Severity x Frequency).

Initially, the development of the ITC '*Emergency Planning and Response Assessment'* is conducted as our baseline for emergency response planning. The process for ongoing, documented risk assessments is reviewed in <u>Element 2 – Hazard Identification and Risk Assessment</u>.

The process of risk assessment must be ongoing to accommodate our dynamic work environments. Emergency Planning and Response, current risk level, capabilities and resources are regularly reviewed in ITC's '*Project Hazard Assessment'* (updated quarterly) and the '*Weekly Hazard Identification and Risk Assessment'* (updated weekly). This process coupled with specific ERPs, should ensure the required resources are available and the recovery plans are adequate and in place.

11.6 Emergency Notification and Communication Protocol

An important key to effective emergency response is a communication system that can relay accurate information quickly. To do this, reliable communications equipment must be used, procedures developed, and personnel trained. The type and location of emergency communication systems must be posted on the workplace. This will include location of telephones, list of personnel with cell phone numbers or two-way radios, and any other equipment available i.e. air horns. A communication system must be made up of strategically placed equipment and properly defined responsibilities. The emergency response plan posted in a conspicuous place that identifies the designated equipment and the people to operate it.

In the event of a situation or occurrence at one of our locations the following levels of notification are outlined. It should be noted that prompt notification may require multiple methods of summoning/notification i.e. phone, email and/or two-way radio etc. Notification of appropriate personnel will be outlined on the emergency contact sheets within the develop workplace specific ERPs.

11.7 Evaluating the Effectiveness of the Emergency Response Plans - Drills

A review is best done in conjunction with an annual drill. The drill will likely identify weaknesses and recommend actions for improvement. Management and employee health and safety representatives should participate in all steps including the annual review of the response plan.

ITC will conduct emergency response drills at each work location to ensure awareness and effectiveness our Emergency Planning and Response. The results of these drills will be documented and evaluated for improvements. (*See ITC Emergency Planning and Response - Drill Record*).

11.8 Resource Mobilization and Emergency Response Procedures

Following an initial assessment by response personnel, the necessary resources must be assembled in an orderly and coordinated manner.

The risk assessment performed earlier will help to define what external and internal resources, both personnel and equipment, might be needed to deal with worst-case scenarios.

The plan must:
- designate the person responsible to mobilize the people, equipment, and materials from within the organization;
- define exactly how the response team will be notified;
- detail the procedures for requesting and obtaining resources from outside the organization;
- identify any special logistical considerations for moving required resources to sites.

When developing your specific response procedures and plans:

➢ PROVIDE clear guidelines to follow.
➢ DETERMINE how the emergency response will be initiated.
➢ IDENTIFY the circumstances in which a command centre will be necessary.
➢ OUTLINE how supervisors and other personnel are expected to respond to emergencies.
➢ IDENTIFY specific scenarios where you would call for emergency services.
➢ IDENTIFY who is responsible for contacting outside emergency services.
➢ ESTABLISH procedures to alert first responders and the fire department, police, or ambulance.
➢ IDENTIFY scenarios where you would shut down or evacuate the workplace.
➢ OUTLINE safety procedures for all personnel.
➢ INCLUDE adequate procedures to control emergencies that may occur outside of business hours.

Response to specific scenarios have been developed and are located in ITC Appendix - *Emergency Response.* They include, but are not limited to:

- Fire/Explosion
- Responding to Spills
- Responding to Injury and Illness
- Responding to a Fallen Worker and the use of the Dedicated Evacuation Platform (DEP)
- Severe Weather
- Power Failure
- Earthquake
- Water Damage
- Gas Leak
- Electrical Malfunctions

In any Emergency Response Procedure, the following steps are basic and essential:

➢ Stay calm.
➢ Assess the situation.
➢ Take command.
➢ Provide protection.
➢ Aid and manage.
➢ Maintain contact.
➢ Guide emergency services.

11.9 Emergency Response Plans and Information to be Posted

Emergency Response Plans must be reviewed regularly to ensure that the plans are current and applicable for the current scope of work. All affected workers must be informed in the emergency response practices and procedures.

ITC orientations will review ERPs will all personnel. There will be ongoing meetings to deliver and review active ERPs. Additionally, the following information will 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/ muster point.
- Names and certificates of the acting first aid attendants will be conspicuously posted.
- Brief, but specific, instruction with the appropriate emergency contact numbers will be posted with every area map. The contact information must include (not limited to):

Fire	Ambulance
Police	Hazardous Materials
Workplace Health & Safety	Nearest Hospital
Poison Control Centre	Gas Company
Water Company	Power Company

- Publicly posted with the area map and contact numbers will be brief step-by-step instructions that specify the following procedures:

  - ➢ *Internal notification* (i.e. supervisor, health and safety committee etc.)
  - ➢ *External notification* (i.e. 911- emergency, fire, ambulance, poison control centre, etc.)

- A copy of all relevant site-specific, Emergency Response Plans ERPs, with applicable emergency contacts for prompt notification.

11.10 Post- Traumatic Stress and Debriefing

The recovery process, or what happens after the emergency response has been completed, is a critical step in the plan. Some people involved may need assistance in order to recover. In these situations, post incident, refer to ITC Human Resources department for Post-Traumatic Stress measures.

Debriefing is necessary to review how well the plan worked in the emergency and to correct any deficiencies that were identified. Debriefing is critical to the success of the future emergency response plan. These reviews will be conducted in our regular safety meetings and through tool box talks for site level personnel.

11.11 Fire Prevention Plans, Fire Suppression Systems and Critical Equipment

In your plan, include procedures for inspecting and/or testing critical equipment, or their components, on a regular basis. Ensure to specify the following:

- equipment and components to be tested or inspected;
- type of test (visual, monitoring, nondestructive, etc.);
- frequency of the inspection or test; and
- documentation of test or inspection results.

Examples of critical equipment or components to be inspected include:

- pumps, valves, fittings, and hoses;
- tanks and containers;
- emergency lighting;
- eyewash and emergency stations;
- electrical distribution systems and equipment;
- fire suppression systems and equipment; and
- detection and alarm systems.

Please reference the schedule outlined in Element 7 - *Preventative Maintenance*, for all systems equipment including, fire extinguishers, first aid kits, oxygen tanks, eye wash stations, DEPs etc. to be inspected and or tested.

11.12 First Aid Provision

ITC is committed to ensuring that appropriate first aid is provided as quickly as possible for any injured personnel. We will provide and maintain first aid procedures for the purpose of minimizing the distress of job-related injuries and illnesses, reducing absenteeism, maintaining productivity, and meeting regulatory requirements.

ITC will perform a first aid assessment for each location prior to commencing work. The results will determine the appropriate first aid services, supplies and equipment required by the Provincial Occupational Health & Safety Regulations. ITC will ensure preparations for first aid services, supplies and equipment and transportation for all personnel during our working hours.

The ITC specific ERPs will outline and reference developed procedures for responding and providing first aid, emergency routes, communication tools, and transportation arrangements. The ERPs will have a record of training and communication and be conspicuously posted.

All first aid attendant training to be completed by qualified persons (i.e. St. John Ambulance or equivalent).

In situations where the provision of first aid services, supplies and equipment is not the responsibility of ITC, we will make every effort to ensure that the responsible party has provisions to render first aid.

First aid attendants will ensure they have readily available updated copies of safety data sheets for WHMIS controlled (Hazardous) products used on that site.

First aid attendants will ensure they that a secure and confidential record of every injury or illness which requires treatment is kept in the first aid record book.

First aid attendants will ensure they adequately inform injured personnel of Injury Management Programs and how to recover at work. (*See Supplemental Programs - Injury Management Program*)

Forms

ITC Emergency Response Plan – Drill Record

ITC Emergency Response Plan – Office 'Template'

ITC Emergency Response Plan – Site-Specific 'Template'

ITC Construction Fire Safety Plan - Template

Appendices

Appendix – ITC HSE Review Index

Appendix – ITC HSE Risk Assessments - Emergency Planning and Response Assessment

Appendix – ITC HSE Emergency Response Plans – General and Specific

Appendix – ITC HSE Construction Fire Safety Plans

Appendix – ITC HSE First Aid

Appendix – ITC HSE Supplemental Programs – ITC Injury Management Program

Appendix – ITC HSE Supplemental Programs – ITC Confined Space Program

Appendix – ITC HSE Supplemental Programs – ITC Fall Protection Program

Element 12- Records and Statistics

12.1 Records and Statistics Policy

ITC will maintain records and statistics relating to health and safety and this information will be used to identify target areas to improve our health and safety performance. The Company will collect, organize and analyse statistics to provide current and comparative information for Management, Supervisors, and workers to review.

These statistics will be collected, recorded and analysed for leading and lagging indicators, including but not limited to the following: claim costs, type of injury or illness, frequency and severity of accidents, as well as the locations of accidents. The Company will compare the data generated year to year to evaluate the performance of its HSE Management System and its programs. These records will be retained in accordance with legislative and Company requirements, outlined below.

The HSE representatives generate Weekly and Monthly safety summaries by project for trend analyses. Quarterly and Annually these summaries are reviewed with Senior Management representatives and the Board of Directors (BOD) to create the strategic initiatives that align with the Company vision and goals.

12.2 Roles and Responsibilities

Senior Management must:
- review reported statistics in the Monthly Management Reporting (MMR) meetings.
- review reported statistics in the Quarterly Board of Directors' Report for trending.

Corporate Safety Manager (CSM) must:
- compile Quarterly reports for review by Board of Directors, Senior Management and other relevant stakeholders.
- identify target areas and trends within the data, and provide recommendations in the quarterly reports.
- maintain a Master Historical Revision log for all controlled/issued/provided ITC HSE documentation.

Safety Manager must:
- oversee the implementation of the statistical collection process.
- monitor input of data generated by each project to ensure compliance and accuracy.

Project Manager must:
- review their project safety statistics as part of their MMR meetings with senior management.
- ensure site statistics are being adequately compiled and submitted for their project(s).

Project Superintendents must:
- ensure Project Safety Coordinators are allotted sufficient time to compile and enter project data into the statistic tracking system.
- ensure meeting minutes are compiled and filed in SharePoint for all site meetings conducted, with a sign attendance roster.
- actively review site health and safety documentation to ensure compliance with HSE standards.

Project Safety Coordinators (PSC) must:
- collect, compile, organize, file, scan, upload, and submit Daily, Weekly, Monthly safety statistics to the appropriate stakeholders. (Required statistical summary submissions outlined below).
- actively review site health and safety documentation to ensure compliance with HSE standards.
- review summaries and identified trends with stakeholders during scheduled safety meetings.

Joint Health and Safety Committee (JHSC) must:
- actively review presented health and safety statistics.
- identify target areas and trends within the data, and provide recommendations.
- ensure identified corrective actions have been effectively implemented.

12.3 Record Retention

The following records shall be maintained for a *minimum of five (5) years*:
- First-aid Treatment and Patient Assessment Records and related Regional required documents i.e. WorkSafeBC requires Form 7, 7A, 6
- Regional bodies and other 'official' inspection reports
- Accident/incident investigation reports
- Investigations and Reporting Records
- Formal Inspections (internal and external)
- Safety Meeting minutes including Joint Health and Safety Committee Meetings
- Corporate Employee Orientation Records
- Equipment and vehicle inspections
- Employee Training and certification records i.e. First Aid, Fall Protection, forklift etc.
- Claim (Injury / Illness) Management records
- Correspondence with Regulatory bodies
- Audit reports and developed Corrective Action Plans
- Emergency Response test/drill records
- Disciplinary Action Records
- Safety Data Sheets

All collected, relevant, Trade Contractor health and safety documentation will be maintained for a *minimum of three (3) years.* The documentation will be collected and stored on sites. Documentation is

maintained by the site PSC within the project binder system. Trade project documentation will be maintained for the duration of the project and/or the duration of the Trade Contractor's contract.

12.4 Statistical Summaries

Monthly Safety Summary

The ITC monthly safety summary is a record of safety-related information taken from the first day of the month to the last day of the month. It is imperative the information collected each month is accurately transcribed in to the package for future reference.

Statistical safety summaries serve several purposes:
1. To give management an overview of the current state of health and safety over the past month.
2. To give the JHSC an overview of the current state of health and safety over the past month.
3. To provide statistical information that can be used to identify trends and target initiatives.
4. To provide statistical information, and reports for the Quarterly Board of Directors meeting.
5. To provide to internal and external auditors as part of the compliance audit reviews.

The Monthly summary submission includes leading and lagging indicators for tracking, including but not limited to, the following:
- Safety Meetings- all types i.e. trade site safety, toolbox talks, stand down etc.
- Formal Inspections
- Incident Investigations
- Discipline Reports
- Orientations Conducted

PSC Monthly Safety Summary Requirements include the following:
➢ **Monthly First Aid Treatment Summary** (Project specific)
➢ **Monthly Project Safety Report** (Trade contractor monitoring)
➢ **Monthly Project Safety Statistics** (Weekly maintained data entry, monthly submitted)
➢ **Annual Worker Count** (Maintained weekly, monthly, and reviewed annually)

For instructions on how to weekly compile and monthly submit required health and safety project documentation, please see the *ITC Records and Statistics Appendix*.

Quarterly and Annual Safety Summaries

PSC weekly project generated health and safety data will be maintained in excel tracking spreadsheets. This data will be complied by the PSC and submitted monthly to the Safety Manager and CSM. The CSM will compile ITC Corporate and active project submissions to develop statistical presentation reports that will be presented Quarterly and Annually to the BOD and Senior Management for their review.

Forms

ITC Monthly First Aid Treatment Summary (Project specific)

ITC Monthly Project Safety Report (Trade contractor monitoring)

ITC Monthly Project Safety Statistics (Weekly maintained data entry, monthly submitted)

ITC Annual Worker Count (Maintained weekly, monthly, and reviewed annually)

Appendices

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Appendix – ITC HSE Records and Statistics

Element 13- Legislation

13.1 Legislation Policy

Safety legislation is designed to protect the employees/workers, the public and the environment. Compliance with legislation helps prevent personal injuries, fines and legal actions. Our HSE Management System and Programs are developed to assure compliance with Federal, Provincial, and Local Regulations. Particular emphasis on the *British Columbia Worker's Compensation Act and the Occupational Health and Safety, Regulations and Guidelines; Alberta's Occupational Health and Safety Act, Regulation and Code* that apply to our operations.

ITC will develop and maintain a compliant HSE Management System and ensure that employees have ready access to relevant legislation. ITC will ensure copies of the provincial act, code and regulations are readily available at all our locations. All employees and Trade Contractor's workers will be made aware of the location.

Management and supervisors will actively refer to legislated safety requirements during all project development stages. This will benefit the safe and efficient planning of our work activities; while ensuring ITC maintains the required regulatory compliance from all engaged stakeholders.

Rights and responsibilities for all ITC personnel and trade contractor's workers are outlined throughout this manual and its supporting programs and appendices. All personnel and workers on our projects will be made aware of these rights and responsibilities during their ITC Corporate Orientation and ITC's Site Orientations.

13.2 Access to Legislation

All ITC employees and Trade Contractor's workers have the right to access and understand applicable work jurisdiction's Workplace OHS Regulations, Codes, Guidelines and Workers Compensation Act legislation that directly relates to the type of work carried out. Access to legislation is available in the following ways:

- Head offices – office staff can obtain legislation from the Safety Manager
- Internet access at all locations - www.worksafebc.com / www.alberta.ca
- Handi-Guide OHS Legislation (Print)- at all locations
- WorkSafeBC APP available as a free download
- Workers can obtain legislation from the safety officer at their project

13.3 Workers' Rights and Responsibilities

Workers' Rights

All ITC employees and Trade Contractor's workers have the right to a safe and healthy workplace. The following worker rights are expected to be known and understood by all:

- **The Right to Know** – the right to know about hazards in the workplace. Employers must establish a valid occupational health and safety program and notify workers of safety concerns and unsafe conditions. Employers must also train their employees to do their work safely and provide proper supervision.
- **The Right to Participate** – this allows workers to actively participate in all aspects of safety that may affect individual or other workers. This includes but is not limited to: inspections, investigations, Joint Occupational Health and Safety Committee, and practical training.

- **The Right to Refuse** –unsafe work refusal, is when a worker(s) have reasonable cause to believe that performing a job or task puts them or someone else at risk. The worker(s) must not perform the job or task. Worker(s) must not start work that they feel they are not trained, qualified or equipped to carry out. Worker(s) that feel that task they are completing has become unsafe, they must immediately stop the work. If this is the case, all refusals to work must be reported to their supervisor.

  *See the *Unsafe Work Refusal Procedure*s located in the ITC HSE Appendices, under ITC Investigations and Reporting.

Workers' Responsibilities

All ITC employees and Trade Contractor's workers also have individual health and safety responsibilities. The following (not limited to) are worker responsibilities. They are expected to be known and understood by all:

1. Setting a good example for fellow workers. Conducting themselves in a respectful manner.
2. Taking responsibility for their own safety and for the safety of others.
3. Ensuring that they are physically and mentally fit to perform their assigned duties.
4. Being knowledgeable of the ITC HSE Programs, Practices and Procedures to safely perform duties.
5. Following all Regional Legislation and the ITC HSE Programs, Practices and Procedures.
6. Reporting to their supervisor if they believe that they lack training for a specific task or procedure.
7. Reporting the absence or defect in any equipment, unsafe conditions, unsafe acts, all injuries and all accidents and near misses promptly to a supervisor.

13.4 Legislation References

ITC performs work in both British Columbia and Alberta. Relevant legislation reference includes:

British Columbia
The following legislation sets the minimum requirements for occupational health and safety in B.C.:

- The Workers Compensation Act (WCA): The WCA is the governing legal document that describes not only the authority for making health and safety laws, but also specific health and safety requirements as found in Part 3 of the WCA. Part 3 establishes rights and responsibilities of workplace parties, joint committees and worker representatives, protection against OHS-Related discrimination, accident reporting, investigations, enforcement, offences, administrative procedures, and regulation-making authority.

- The Occupational Health and Safety Regulation (OHSR): After the WCA, the next highest level of legal requirements is described in the OHSR. It outlines the general requirements that apply to all workplaces, and specific requirements based on the type of hazards and work activities.

- Policies: The WSBC develops policies that describe how certain sections of the WCA and OHSR will be enforced. The requirements created by WSBC Policy must be adhered to – this applies to both how the WCB conducts its business including Board Officers, and what employers, superintendents and worker need to do to comply.

- Guidelines: Like WSBC Polices, the Guidelines are developed internally by the WSBC. Guidelines are intended to provide greater clarity on what is required to comply with certain sections of the WCA and OHSR. Therefore, the guidelines create conditions that affect safety compliance and must be adhered to for compliance with the WCA and the OHSR.

- Standards: The WSBC, WCA, OHSR, Policies and Guidelines also refer to standards. As a result, any standard referenced becomes a legally enforceable regulatory requirement. The WSBC uses standards that they have developed and standards established by other organizations. The WSBC standards are available free of charge on their website. Standards published by other organizations such as the Canadian standards Association, ASME, ANSI, etc. must be purchased from the organization or an authorized supplier.

Alberta

The following legislation sets the minimum requirements for occupational health and safety in AB:

- Alberta's *Occupational Health and Safety Act (AB OHS)*, Regulation and Code: set minimum standards for health, safety and wellness in Alberta's workplaces. Employers and workers need to know these rules.

- OHS Code: The OHS Act, Regulation and Code set out the minimum technical requirements for health and safety in Alberta's workplaces.

- OHS Code Explanation Guide: Explanations in the guide help clarify the intent or application of each rule or section of the Code. Additional technical information and illustrations supplement the explanations.

13.5 Legislation Review

As part of our HSE audit and review process we will assess our Legislation policy and ensure is it up to date and complete. Any gaps identified will be addressed as part of our continuous improvement plan. *See Element 15- Continuous Improvement and Management Review; and ITC HSE Appendix- Program Review Matrix.*

All employees/workers, supervisors/foremen and management are encouraged to provide recommendations for improvements to the processes and procedures specified in this HSE Program and/or to provide access to required documentation.

Forms

Appendices

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Appendix – ITC HSE Investigations and Reporting Procedures
Appendix – ITC HSE Investigations and Reporting Forms

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Element 14- Health and Safety Committees

14.1 Health and Safety Committees

While the employer is ultimately responsible for overall safety in the workplace, Health, and Safety Committees play an important role in our HSE Management System, giving workers and employers a way to work together to identify and find solutions to workplace health and safety issues.

ITC will establish and maintain a Health and Safety Committee in each workplace where twenty or more workers are regularly employed. Our Health and Safety Committees will be established in accordance with the following:

a) it must have at least four members,
b) it must consist of worker representatives and employer representatives,
c) at least half the members must be worker representatives, and
d) it must have two co-chairs, one selected by the worker representatives and the other selected by the employer representatives.

Selection of our Health and Safety Committee Representatives will be in accordance with the following:

a) worker representatives must be selected by their peers from workers at the workplace who do not exercise managerial functions at that workplace,
b) the worker representatives are to be selected in equitable proportion to their relative numbers and relative risks to health and safety,
c) if the workers do not make their own selection after being given the opportunity under paragraphs (a), the employer must assign persons to act as worker representatives; and
d) employer representatives must be selected by the employer from among persons who exercise managerial functions for the employer and, to the extent possible, who do so at the workplace for which the committee is established.

14.2 Health and Safety Committees Duties and Functions

As a committee, collectively, your role in the workplace includes promoting health and safety; consulting with workers and employers about worker health and safety; making recommendations to improve the occupational environment and the effectiveness of the HSE programs and policies in the workplace. More specifically, Joint Health and Safety Committee members have the following specific duties and functions:

- Identify situations that may be unhealthy or unsafe for workers and advise on effective systems for responding to those situations.
- Consider, and promptly deal with complaints relating to the health and safety of workers.
- Consult with workers and the employer on issues related to occupational health and safety, and the occupational environment.
- Make recommendations to the employer and the workers for the improvement of the occupational health and safety, and the occupational environment of workers.

- Make recommendations to the employer on educational programs promoting the health and safety of workers and compliance with the *Workers Compensation Act* and the OHS regulations, and to monitor their effectiveness.
- Advise the employer on programs and policies required under the regulations for the workplace, and to monitor their effectiveness.
- Advise the employer on proposed changes to the workplace, including significant proposed changes to equipment and machinery, or the work processes that may affect the health or safety of workers.
- Ensure that accident investigations and regular inspections are carried out as required.
- Participate in inspections, investigations, and inquiries.

14.3 Employer Obligations

The employer must provide the Joint Health and Safety Committees with the equipment, premises, and clerical personnel necessary for the carrying out of its duties and functions.

The employer must respond to the Joint Health and Safety Committees recommendations. If a joint committee sends a written recommendation to an employer with a written request for a response from the employer.

The employer must respond in writing to the committee within twenty-one days of receiving the request, either indicating acceptance of the recommendation, or giving the employer's reasons for not accepting the recommendation.

14.4 Health and Safety Committee Information and Reports (Meeting Minutes)

After each Health and Safety Committee meeting, the committee must prepare a report of the meeting and provide a copy to the employer.

The employer must retain a copy of the reports for at least two (2) years from the date of the Health and Safety Committee meeting to which they relate and ensure that the retained reports are readily accessible to the committee members, workers of the employer, officers and other persons authorized by the Board.

The employer will post committee information at each workplace, including the names, work locations and contact information for the committee members, the reports of the three (3) most recent Health and Safety Committee meetings, and copies of any applicable orders for the preceding twelve months.

14.5   Rules of Procedure / Terms of Reference

Each established Joint Health and Safety Committee will meet at least once each month. Each joint committee will establish their own rules of procedure, including rules respecting how it is to perform its duties and functions.

ITC maintains two types of Safety Committees:

1. Joint Health and Safety Committee (JHSC); and
2. Site Safety Committees (active projects).

14.6 ITC Joint Health and Safety Committee

ITC has an established Joint Health and Safety Committee (JHSC). This committee will meet monthly following the duties and functions outlined above.

The JHSCs will include ITC offices and active projects in each province. They will actively review accident, incident and near miss investigations, workplace inspections, review statistical data, injuries, trends, site safety committee meeting minutes, and make recommendations to improve the practice and culture of health and safety on our projects.

Annually, after the prior year's statistical summaries have been developed, the JHSC will meet collectively to review, compare, and align health and safety strategies and goals for the coming year as part of ITC's Continuous Improvement objectives.

Each JHSC will establish a written Terms of Reference (TOR) for their committee. These rules of procedure will identify the nominated co-chairs and other applicable roles. The TOR will be reviewed annually, or each time new membership is established.

14.7 ITC Site Safety Committees

ITC projects where twenty or more workers are regularly employed, a Site Safety Committee will be established. The Site Safety Committee is comprised of a representative from each Trade Contractor. These committees will each meet monthly following the duties and functions outlined above.

Site Safety Committee will actively review accident, incident and near miss investigations, workplace inspections, review statistical data, injuries, and trends in order to make recommendations to improve the practice and culture of health and safety on our projects.

Trade Contractor, Health and Safety Representatives are required to meet the minimum education and training requirements for Joint Health and Safety Committee members in order to participate.

The ITC Project Safety Coordinator will establish a written Terms of Reference (TOR) for their Site Safety Committee. These rules of procedure will identify the nominated co-chairs and other applicable roles. The TOR will be reviewed annually, or each time new membership is established.

14.8 Allowance, Training and Education for Joint Health and Safety Committee Members

Allowance
A member of a joint committee is entitled to time off from work for the time required to attend meetings of the committee, and other time that is reasonably necessary to prepare for meetings of the committee and to fulfill the other duties and functions of the committee. Time off is deemed to be time worked for the employer, and the employer must pay the member for that time.

Training
ITC must ensure that each member of the Joint Health and Safety Committees who is selected to be a member receives, as soon as practicable but no more than six (6) months after becoming a member, a total of at least eight (8) hours of instruction and training, as outlined below.

JHSC Member Instruction and Training required:

a) the duties and functions of a joint committee,
b) the rules of procedure / terms of reference of the joint committee as established,
c) the requirements respecting participating in and reviewing investigations,
d) the requirements respecting participating in and reviewing inspections,
e) the requirements respecting refusal of unsafe work; and
f) the requirements respecting the annual evaluation of joint committees.

The Trade Contractor must ensure that the worker Health and Safety Representative at each of the employer's workplaces who was selected to be a representative receives, as soon as practicable but no more than six (6) months after becoming a representative, a total of at least four (4) hours of instruction and training, as outlined below.

Site Safety Committee Member Instruction and Training required:

a) the duties and functions of a joint committee,
b) the rules of procedure / terms of reference of the joint committee as established,
c) the requirements respecting participating in and reviewing investigations,
d) the requirements respecting participating in and reviewing inspections; and
e) the requirements respecting refusal of unsafe work.

For greater certainty, the instruction and training required is not educational leave as set out below.

Education
Each member of a Joint Health and Safety Committee is entitled to an annual educational leave totalling eight (8) hours, or a longer period if prescribed by regulation, for the purposes of attending approved occupational health and safety training courses.

A member of the joint committee may designate another member as being entitled to take all or part of the member's educational leave.

The employer must provide the educational leave under this section without loss of pay or other benefits and must pay for, or reimburse the worker for, the costs of the training course and the reasonable costs of attending the course.

14.9 Participation in Employer Incident Investigations

Investigations must be carried out by persons knowledgeable about the type of work involved. It also requires the participation of the employer representative, and a worker representative, if they are reasonably available.

The participation of a worker representative includes, but is not limited to, the following:

- Viewing the scene of the incident with the persons carrying out the investigation
- Providing advice respecting the methods used to carry out the investigation, the scope of the investigation, or any other aspect of the investigation
- Assisting the persons carrying out the investigation with:
  - Gathering information relating to the investigation
  - Analyzing the information gathered during the investigation
  - Identifying any corrective actions necessary to prevent recurrence of similar incidents

Employers are expected to ensure the participation of worker representatives in incident investigations as this plays an important part in maintaining healthy and safe workplaces.

14.10 Annual Evaluation of the Health and Safety Committee

An employer must ensure that, with respect to each of the employer's joint committees, a written evaluation is conducted annually by the co-chairs of the joint committee or, with respect to each co-chair, the member or members of the joint committee designated by the co-chair.

The evaluation must contain, but is not limited to, the following information:

a) the joint committee fulfilled each of its duties and functions in accordance with this policy,
b) the joint committee met regularly as required in accordance with this policy,
c) the employer met the requirements in accordance with this policy, in respect of the written recommendations sent to the employer, if any,
d) each member of the joint committee received the time off from work the member was entitled to receive in accordance with this policy,
e) each member of the joint committee attended the occupational health and safety training courses the member was entitled to attend in accordance with this policy,
f) each member of the joint committee received the instruction and training the employer was required to ensure was provided to the member in accordance with this policy, and
g) an assessment of the overall effectiveness of the joint committee.

The joint committee must discuss the evaluation at the meeting immediately following completion of the evaluation and ensure that the evaluation and a summary of the discussion is included in the report of that meeting.

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Forms

ITC Annual Joint Health and Safety Committee Evaluation Tool
ITC Terms of Reference (TOR) – Joint Health and Safety Committee
ITC Joint Health and Safety Committee Agenda & Meeting Minutes Template
ITC Site Safety Committee Agenda & Meeting Minutes Template
ITC Joint Health and Safety Committee Recommendation for Employer Form

Appendices

Appendix – ITC HSE Health and Safety Committees

ITC Construction Group

Element 15- Continuous Improvement

15.1 Continuous Improvement Policy

This policy details the manner in which health and safety objectives will be developed and communicated at ITC. We call this process Continuous Improvement; this process will promote awareness and ensure compliance with the applicable regulatory and legislative governing bodies. It will ensure that the goals and objectives are established in accordance with a review of ITC's health and safety needs. Ultimately the purpose is to continually improve health and safety in the workplace and to set objectives to demonstrate commitment to prevention of workplace accidents and occupational illness.

A *Health and Safety Objective* is the establishment of achievable targets and performance indicators that show continued improvement and the ultimate achievement and maintenance of zero injuries, accidents and work-related illness.

This HSE Program and all supplementary programs will be reviewed regularly. These reviews will be done in consultation with relevant stakeholders, including: The Joint health and Safety Committee (JHSC), Project Safety Coordinators, Workers, and Senior Management. Reviews will be performed at scheduled Committee meetings throughout the year.

Additional reviews to be conducted as required with the approval and support of the Joint health and Safety Committee and Management. This involves reviewing the HSE System and Programs in order to identify the strengths and weaknesses; make recommendations on where and how to improve the system; and prevent workplace accidents, incidents and occupational illness.

15.2 Responsibilities

Senior Management will:
- based on recommendations made by the Corporate Safety Manager (CSM) in conjunction with the Safety Manager and the JHSC, set goals and objectives at the Board of Director's (BOD) meetings for the health and safety and prevention of accidents at the workplace.
- ensure the goals set include target dates for completion, responsibilities appropriately assigned as well as the resources required to meet ITC's needs.
- review at least annually along with the JHSC a written Health, Safety and Environmental Policy signed and dated by Senior Management.
- review health and safety trends to include injury/illness causes, workplace inspections, incident investigations, hazard reports, work refusal reports and health and safety recommendations from the JHSC and or HSE Representative(s).
- identify improvement opportunities for the HSE Policy and HSE Systems, and Programs

- meet at least quarterly to consider, among other matters, the relevance of the policy and, if necessary, to recommend changes, statistical safety summary review for trend identification and comparative reviews.

Project Management and Project Superintendents will:
- be knowledgeable of their accountabilities and responsibilities through employer training.
- ensure that the ITC policy, programs and procedures are implemented and followed.
- familiarize and support the goals set by their Senior Management in accordance with ITC's health and safety objectives, goals in the prevention of workplace accidents, incidents, injuries and illnesses.

Project Safety Coordinators (PSC) / Employees will:
- assist and support in reaching the goals and objectives of ITC's Senior Management as communicated by JHSC members, HSE Representatives and Project Managers and Project Supervisors.

Joint Health and Safety Committee (JHSC) and the Health, Safety Environmental (HSE) Representative(s)
- review changes (new or revised) regulations, legislation made under the act
- review and make suggestions on all ITC HSE policies, programs and procedures that are directed at protecting the health and safety of individuals on a regular basis, ensuring compliance with the Act, Regulations and Code.
- assist senior management, as appropriate, in communicating and reaching the health and safety goals and objectives.

15.3 Health and Safety Objectives

The continuous improvement process is to begin with a review of the overall HSE System and its features. Significant deficiencies/non-conformances must be identified and addressed. Senior Management can make well-informed decisions for retaining, improving or eliminating processes based on these results. Properly conducted HSE review results will:

- Expose actual or potential risk
- Clearly identify problem areas requiring attention
- Give management insight
- Assess training effectiveness
- Verify compliances

Based on internal and external compliance audits and evaluations, the CSM, Safety Manager and the JHSC shall develop recommendations for an effective health and safety objective.
Health and Safety Objective examples:

- Reduce or eliminate the number of accidents and injuries i.e. reduce sprains in the filed by 75% in the next 12-month period
- Reduce specific hazards and risks
- Increase incident and near miss reporting by 80% in the next 12-month period

Health and Safety Objectives need to be 'SMART':
- **Specific** – Related to a clearly defined outcome. It needs to be sufficiently detailed and focused to provide direction.
- **Measurable** – The results can be measured in terms of quality, quantity, time, cost etc., so that progress can be assessed.
- **Attainable** – Accomplishing the target needs to be challenging, but within reason for the person's ability and resource constraints.
- **Relevant** – The targets are appropriate to the needs of the organization.
- **Time-bound** – Specific deadlines are set for accomplishing the target.

Example of a SMART objective:

➢ ITC will reduce the incident rate of sprains and strains by 80% by the end of the year.

Determining the HSE Annual Objective
The CSM, Safety Manager and the JHSC will have a combined role in reviewing relevant documentation to determine suitable objectives to present to Senior Management and the BOD for their review. This process will be driven under the direction of the CSM, with the support of the Safety Manager and the JHSC co-chairs.

The health and safety objectives recommended will be reviewed at quarter and annual Senior Management and BOD Meetings. Senior Management with the BOD will ultimately drive the direction of annual health and safety objective.

Development of the Action Plan: we will use a continuous improvement planning tool form to develop the annual objective action plan. This will communicate what the objective is, why it was chosen and how it will be achieved.

If we meet our objective: acknowledgment of this success will be shared with the company at the Annual meetings and shared in toolbox talks.

If we do not meet our objective: during the next annual review this objective will be re-evaluated. If the objective receives recommendation from the JHSC, senior management will determine the priority based on the findings of the annual review conducted by the CSM and the JHSC.

Forms

ITC HSE Continuous Improvement Plan
ITC Health and Safety Objective Evaluation Form

Appendices

Appendix – ITC HSE Review Index
Appendix – ITC HSE Continuous Improvement Forms
Appendix – ITC HSE Continuous Improvement Plans

Element 16- Workplace Exposure

16.1 Workplace Exposure Policy

Workplace Exposure is also identified as 'Occupational Hygiene', which focuses on the prevention of the occupational diseases. The exposure to health hazards can lead to diseases and illnesses that can manifest either immediately or after a long period of time after the exposure has stopped. Since these diseases are a consequence of exposure to hazards present in the workplace, they are known as occupational diseases. Occupational hygiene uses methods for exposure identification and evaluation following the techniques of anticipation, identification, evaluation, and control. Our goal at ITC is to identify solutions for eliminating or reducing the hazard and monitoring to ensure no further harm occurs.

ITC understands the importance of providing a safe and healthy workplace. To ensure the safety of the public, employees and workers at all ITC workplaces, Exposure Control Plans and Workplace Monitoring Programs will be implemented and communicated for all work areas. ITC will work cooperatively with its trade contractors to ensure that Workplace Exposures associated with their tasks are identified and that appropriate Exposure Control Plans are implemented.

16.2 Workplace Exposure Limits

A workplace exposure limit is referred to as the 'Occupational Exposure Limit' (OEL). This represents the maximum airborne concentration of a toxic substance to which a worker can be exposed over a period of time without suffering any harmful consequences.

These limits are set out by many professional organizations around the world, such as the American Conference of Governmental Industrial Hygienists (ACGIH), and the National Institute for Occupational Safety and Health (NIOSH) in the United States. They are established based on the chemical properties of the substance, experimental studies on animals and humans, toxicological and epidemiological data. Different organizations may use different terminology for the OEL. For example, the ACGIH term for OEL is "Threshold Limit Value" (TLV)® while the NIOSH term is "recommended exposure limits" (REL).

The OELs developed by the professional organizations are guidelines. Only the values adopted and prescribed by the health and safety legislation are enforceable.

Note: For carcinogens and other specific agents (such as allergens), the "As Low as Reasonably Practicable" (ALARA) principle should be applied. ALARA, in practical terms, means that exposure should be eliminated or reduced as much as possible.

16.3 Workplace Exposure Limit Types

Employers must ensure 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. ACGIH defines three categories of threshold limit values:

Threshold Limit Value – Time-Weighted Average (TLV-TWA): The concentration of a hazardous substance in the air averaged over an 8-hour workday and a 40-hour workweek to which it is believed that workers may be repeatedly exposed, day after day, for a working lifetime without adverse effects.

Threshold Limit Value – Short-term exposure (TLV-STEL): A 15-minute time weighted average exposure that should not be exceeded at any time during a workday, even if the overall 8-hour TLV-TWA is below the TLV-TWA. Workers should not be exposed more than four times per day to concentrations between TLV-TWA and TLV-STEL. There should be at least a 60-minute interval between exposures. The short-term exposure threshold has been adopted to account for the acute effects of substances that have primarily chronic affects.

Threshold Limit Value – Ceiling (TLV-C): This is the concentration that should not be exceeded during any part of the working exposure. Peak exposures should be always controlled. For substances that do not have TLV-TWA or TLV-C established, the maximum admissible peak concentrations must not exceed:

- Three-times the value of the TLV-TWA for no more than 15 minutes, no more than four times per workday. Exposures must be at least 1 hour apart during the workday.
- Five times the TLV-TWA under any circumstances.

The units of measures for the threshold limit values are ppm and mg/m^3. The TLVs for aerosols are expressed usually in mg/m^3. The TLVs for gases and vapours are expressed in ppm or mg/m^3.

In the workplace, a worker may be exposed to several chemical substances at a time. If the toxicological effect of the substances is similar (e.g., each substance affects same target organ or has a similar effect), it can be considered that the combined effect of the chemicals will be the sum of individual effects. A common example is exposure to several organic solvents. Which is a fundamental reason to have a qualified person develop appropriate workplace Exposure Control Plans (ECPs) to implement and reduce the risk of exposure.

16.4 Workplace Exposure Control Plans

If it is not practicable to substitute a material which reduces the risk to workers, the employer must implement an exposure control plan to maintain workers' exposure as low as reasonably achievable below the exposure limit. An ECP must be implemented when exposure monitoring indicates that a worker is or may be exposed to an air contaminant in excess of 50% of its exposure limit; measurement is not possible at 50% of the applicable exposure limit; or otherwise required by Regulation.

Workplace Exposure Control Programs

ITC has developed *Workplace Exposure Control Programs* and *Exposure Control Plans*. ITC Workplace Exposure Control Programs are widely used and are considered known/identified occupational exposures that have general, developed procedures to communicate and follow. ITCs ECPs are developed for site-specific requirements, identified occupational exposures; these may be new, changed, or infrequent workplace exposures that are not a written program.

ITCs Workplace Exposure Control Programs are located under ITC Supplemental Programs. Examples of ITC developed Workplace Exposure Control Programs include, but are not limited to, the following:

- ITC Carbon Monoxide Program
- ITC Communicable Diseases Program
- ITC Hearing Conservation Program
- ITC Musculoskeletal Injury Program

Exposure Control Plan Requirements

ECPs require a risk assessment to be conducted by a qualified person to determine if there is a potential for occupational exposure. The assessment will list of all work activities for which there is a potential for occupational exposure. It will outline the standard procedures, engineering, and administrative controls to eliminate or minimize the potential for occupational exposure. The ECP will review required PPE to eliminate or minimize occupational exposure.

The ITC HSE Safety Management System generates the platform to inform workers about the contents of the generated exposure control programs and plans and how to provide adequate education, training, and supervision/ monitoring to work safely with, and in proximity to, a hazardous substance.

Ultimately, a record of all training and education provided to workers in the exposure program/plan must be documented and maintained. Additionally, a record of all workers who have been exposed, while performing work activities, to a hazardous substance.

ECPs must incorporate the following elements**:**

1. a statement of purpose and responsibilities;
2. risk identification, assessment and control;
3. education and training;
4. written safe work practices and/or safe job procedures that address at least the following:

    - the containment of the processes, if used as a control measure;
    - the effective control of worker exposure;
    - safe work practices and safe job procedures;
    - the correct selection, use, care and maintenance of any required PPE and clothing;
    - emergency procedures;
    - the removal, cleanup and disposal, including the measures that will be used.

5. hygiene facilities and decontamination procedures, when required;
6. health monitoring, when required;
7. documentation, when required.
8. The plan must be reviewed at least annually and updated as necessary by the employer, in consultation with the joint health and safety committee or the worker health and safety representative, as applicable.

Types of ECPs that may be required (not limited to), including both physical and chemical exposures are:

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- Thermal Stress
- Cold Stress
- Illumination
- Violence
- Vibration
- Noise
- Musculoskeletal Injury (MSI)
- Fatigue
- Asbestos
- Respirable Dusts

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- Welding Fumes
- Use of Solvents
- Lead
- Blood Borne Pathogens
- Infectious Disease
- Communicable Disease
- Hepatitis A & B
- Spill Response
- Water Contamination
- Sanitation Facilities

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Note: ITC ECPs are located under ITC HSE Exposure Control Plans.

Forms

Appendices

Appendix – ITC HSE Review Index
Appendix – ITC HSE Exposure Control Plans
Appendix – ITC HSE Supplemental Programs