

Statement of Safety Policy

The ITC Group of Companies is committed to providing a safe and healthy work environment. This is done through the prevention of illness and injury by providing and maintaining healthy and safe projects.

ITC endeavors to meet its responsibilities for the health and safety of the members of its community by adhering to relevant health and safety standards and legislative requirements and by assigning general and specific responsibilities for workplace health and safety.

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.

ITC believes that safety truly is everyone's business, that each employee respective of their position is responsible for and has an accountability towards safety. That the work at the crew level is the final expression of the leadership and management of the company.

ITC Management and its employees will work together in the spirit of consultation and cooperation. ITC takes all reasonable steps to ensure its employees know their rights and responsibilities in the workplace, and all applicable regulations and procedures for protecting their health and safety.

ITC recognizes the right of all workers to work in a safe and healthy work environment and also the workers 3 main rights: The Right to Know, The Right to Participate, and the Right to Refuse.

Also, of particular importance is our duty as "Construction Manager", to ensure diligent coordination of multiple trade employers on our projects. ITC recognizes the right of all workers to work in a safe and healthy work environment.

As president and CEO, I am committed to ensuring that excellent management and leadership throughout our organization will result in safe and healthy environments for all persons on or near our construction projects.

Doug MacFarlane
President & C.E.O

Mathias Graf,
Director of Operations –
Alberta Region

Harold Barisoff, Vice President,
Construction

Rick McGill, Vice President,
Operations

1.1 Health, Safety and Environmental Program (HSE Program)

The ITC Construction Group (ITC) Health, Safety and Environmental Program (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 Manual is to document our commitment to providing a healthy and safe work environment at each workplace. This HSE program, HSE manual and ITC safety programs apply to trade contractor employees as well as ITC employees. This HSE manual applies in all Provinces in which ITC may conduct work.

This manual has been developed in the spirit of consultation and cooperation involving our employees and all levels of management. The HSE manual demonstrates our corporate values, accountability as well as general and specific responsibilities for safety while at work.

The Health, Safety and Environmental program (HSE) including this manual, and all supplementary programs will be reviewed annually. These reviews will be done in consultation with the Regional Joint health and Safety Committee, the project safety coordinators, workers and senior management. Reviews will take place at various committee meetings throughout each year. Additional reviews will be done by the PSC's during meetings with the approval and support of Management.

The HSE Manual 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.

1.2 Definitions

Safe work Practices: Guidelines established to help workers perform a task that may not need a step-by-step procedure.

Safe Work Procedure: A written, specific step-by-step description of how to complete a job safely and efficiently from start to finish. Safe job procedures must clearly identify the hazards the worker could be exposed to, the steps required to complete the task (in proper order) and the control measures (also referred to as safe work procedures or execution plans).

SWP: Safe Work Practice/Safe Work Procedure

HSE: Health, Safety and Environment Program

General duties: a set up duties for each job position

Specific Duties: duties that an employee may be asked to carry out in addition to their general duties. These may be specific to their title, or role on the project or the office

HIRA: Hazard Identification Risk Assessment. A process that seeks to determine hazards associated with each task and determines the level of risk associated with each hazard

WSBC: WorkSafeBC

OHSR: Occupational Health and safety Regulation

JHA: Job Hazard Analysis

FLHA: Field level Risk Assessment

PSI: Pre shift Instruction

PSC: Project Safety Coordinator

OFA: Occupational First aid Attendant

TCP: Traffic Control Person

RJHSC: Regional Joint Health and Safety Committee

IM: Injury Management

EMP: Environmental Management Plan

ECP: Exposure Control Plan

Alberta OHS: Alberta Occupational Health and Safety

1.3 General Responsibilities

This section outlines general duties assigned to workers, supervisors and all levels of management.

ITC Construction group has developed general and specific responsibilities for all levels of Management, Supervisors, workers, and visitors. All levels of Management must work together to establish and maintain proper safety standards, policies, practices, and procedures.

Management

Management will ensure the development of a comprehensive HSE Program Including Safety Program Policies, Rules and Procedures is developed administered and maintained meeting all Federal, Regional, and local safety codes and Legislation.

1. Establish and maintain a culture of safety within the organization
2. Oversee the continuous improvements to all HSE elements with this program
3. Ensure that all managers are trained to carry out their HSE responsibilities
4. Ensure that a safe and healthy work environment is provided, work practices are monitored, and knowledge gaps are identified.
5. Will ensure all employees are familiar with the HSE program, each employee will be provided with a copy.
6. To prevent unnecessary injury or accidents, work will be assessed, risks identified, and proper training and supervision of workers will be determined.
7. To support Superintendents in their administration of safety activities.

Project Managers

The Project Manager (PM) provides HSE program support to the field staff and operations. PMs will Initiate and implement project specific HSE program requirements for trade contractors and other company representatives.

1. Ensure that the Superintendent is knowledgeable of ITC Health and Safety Policy and Procedures.
2. Ensure continuous communication and consultation with the PSC for safety matters that relate to the project safety.
3. Providing trade contractors with information and requirements of the HSE Program and ensure requirements addressed in signed contracts.
4. To communicate directly with client management personnel with respect to major safety issues and concerns.
5. To ensure the scheduling of pre-job safety meetings with Trade Contractors, company personnel, client representatives.
6. Comply with building codes as to construction means and methods, regulations and project specifications.
7. To notify the Regional Health and Safety Manager upon award of a construction project for pre-planning of safety requirements.

Project Superintendent

Project Superintendents have overall responsibility for the health and safety of all workers at their project. The superintendent is responsible for good community relations including the protection of the public and environment which may be affected by construction activities.

1. Ensure the HSE program is administered fully on each project.
2. Be familiar with the HSE Program as well as applicable legislation.
3. Implement the HSE program on their site and assign specific duties to individuals as required by the HSE program.
4. Develop a clear understanding of safety responsibilities and specific duties for each Supervisor.
5. Ensure the HSE program requirements are being effectively implemented at their project.
6. Include a section on safety during each project coordination meeting with contractors and ensure that action is taken as required.
7. Ensure they provide support to their PSC in implementing the HSE program requirements and assess performance expectations.
8. Coordinate the development of safe work procedures for specialized work to be done on site with the Workers, Supervisors involved, Site PSC and the Regional Health and Safety Manager.
9. Report fatal, near misses and serious incidents to The Regional Health and Safety Manager.
10. The superintendent will oversee all investigations conducted. Contribute to the investigation process to determine basic causes as well as review and sign the Accident/Incident Investigation report.
11. Escort the Regulatory Bodies' inspector during inspections and prepare written follow-ups if the inspector's reports require clarification.

Supervisor / Foreman

The Supervisor shall be responsible for the direct supervision and safety of the crew. He is accountable to the Superintendent for the performance of personnel through the safe work procedures.

1. All supervisors will be knowledgeable and competent in carrying out their duties while ensuring the health and safety of all workers.
2. Lead by example and maintain an awareness of safety.
3. Must be familiar with the HSE program and be knowledgeable of and comply with all Legislation, laws and codes.
4. Enforces all established safety Legislation, work methods and enforce HSE rules.
5. Participate in the investigation process where possible.
6. Works in cooperation with Project team, PSC and Regional Health and Safety Manager when developing Safe Work Procedures for specialized work.
7. Prior to the start of work, they will assess risks, implement controls and communicate with their workers.
8. Supervisors are to know how to access and when to implement the applicable Safe Job Procedures and Safe work Practices.
9. Take immediate action to investigate and correct any dangerous or hazardous conditions, practices or behaviors on the worksite.

Workers

1. Take responsibility for their own safety and for the safety of other workers.
2. Ensure that they are physically and mentally fit to perform his/her assigned duties at the start of each shift.
3. Will conduct themselves in a respectful manner on the worksite.
4. Be knowledgeable of the ITC HSE manual and safety programs to safely carry out duties.
5. Follow all Regional Legislation and company health and safety policies.
6. Follow defined safe job procedures and safe work practices and take an active part in protecting themselves and their fellow workers.
7. Will not perform a task or operate machinery if you have not received the training.
8. Ensure that all tools, equipment or machinery is safe for use or remove from service and turn in any damaged or defective tools or equipment to your supervisor
9. Take immediate corrective action necessary to eliminate hazards to themselves, other site personnel, public, equipment, and environment.
10. Stop and report immediately any and all dangerous or hazardous conditions, practices or behaviors on the worksite to their Supervisor or Superintendent.
11. Stop and report to their supervisor any worker conducting unsafe work practices.
12. Upon sustaining an injury, the employee must report promptly to his/her supervisor and receive first aid or medical help immediately.
13. The employee will report all injuries to their first aid attendant when they happen.
14. Report all accidents and incidents to the Superintendent, PSC and Supervisor.
15. Participate in all required training and meetings.

Regional Health and Safety Manager and Regional Safety Coordinator

The Regional Safety Manager and Regional Safety Coordinator is assigned by the Senior Management the duty of ensuring the company employees are provided a safe work environment. The responsibilities extend to workers of all companies working at our projects. The role of the Prime Contractor requires that an exceptional level of due diligence be met. The RSM/RSC will assess the effectiveness of the safety systems and processes to identify risks that may result in worker injury or loss. The ongoing assessment will aid in developing controls to enhance worker safety.

The RSM/RSC is responsible for developing, implementing, and monitoring the ITC Health Safety and Environment Program. They will provide direction and guidance to the Project Safety Coordinators they assign to each project. The RSM/RSC will ensure Project Safety Coordinators are adequately trained and monitored to fulfill their responsibilities for worker health and safety at each workplace.

RSM/RSC Responsibilities:

1. Select, assign, train and mentor the project safety coordinators to act as the company's health and safety delegate at each company workplace.
2. Maintain an effective system for measuring supervisory safety performance, through periodic inspections of work sites for safety conditions and documentation.
3. Identify and appraise incident and loss producing conditions and practices, and evaluation of the severity of the incident problem.
4. Development of incident prevention and loss control methods procedures and programs.
5. Communication of incident and loss control information to those directly involved.

6. Measurement and evaluation of the effectiveness of the accident and loss control system and the modifications needed to achieve optimum results.
7. Recommend and implement incident prevention policy and provide draft copies of new policies for review by supervisors.
8. Promote acceptance of sound safety practices and encourage full participation of management and project personnel.
9. Establish incident prevention performance standards and establish accountability and controls to ensure standards are being met.
10. Aid in the development and implementation of safe work procedures.
11. Develop and maintain initial and continual education and a safety promotion program for supervisors and employees.
12. Develop and implement a comprehensive system for reporting of all incidents.
13. Review or assign the review of contractor safety records to identify possible hazard concerns.
14. Make thorough analysis of statistical data, locate problems and recommend solutions.
15. Develop and maintain a rapport with applicable government agencies and professional safety organizations, and act as liaison between government agencies and owner regarding major safety issues.
16. Develop a system of planned inspection of projects, equipment, materials to determine existence of unsafe conditions and practices and implements corrective measures.
17. Adjudicate claims and monitor claims to ensure that they are processed in an equitably fair manner for both the company and the worker.
18. Investigate fatal and serious incidents, as well as significant medical aid cases and “near misses”.
19. Prepare and submit monthly statistical and active claims reports to Senior Management and Regional Safety Committees.
20. Participate in committees and associations related to construction incident prevention.
21. Develop and maintain an emergency evacuation plan for each job site for fires, gas leaks, and all-natural emergencies such as earthquakes and floods.
22. Act as advisor for all Corporate Safety Committee Meetings.
23. Ensure all claims are managed as per the Injury Management Plan.

Site Project Safety Coordinator (PSC)

The Project Safety Coordinator will be familiar with the Project Safety Coordinator set of skills and general Duties outlined within the Human Resources Job Description

The 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.

The PSC will:

1. Be professional and always behave in a respectful and cooperative manner.
2. Act as a resource for management, supervisors and workers requiring direction or instruction to ensure a safe workplace.
3. Ensure that no other duties supersede their responsibilities as a first aid attendant.
4. Always deliver first aid professionally and maintaining the patient's confidence.
5. Maintain a full first aid station or room that is clean, tidy and ready for service always.
6. Report to the direct supervisor of any worker, prior to referring any worker to medical aid.
7. Keep current all certification pertaining to the role of Project Safety coordinator.
8. Be responsible for daily administration of the ITC Health and Safety Program.
9. Maintain good working knowledge of local and Regional Legislation as they pertain to public and site safety at the construction site to which they are assigned.
10. Maintain good relations with government inspectors.
11. Conduct ITC's Site Safety Orientations for all new or transferred workers before they commence work on site.
12. Carry out adequate daily safety inspections and maintain daily reports.
13. Post all WorkSafeBC / OHS Inspections until compliance has been achieved and file copies of inspection report on site and submit copies to Head Office immediately.
14. Post ITC Regional Safety Manager Inspections for at least 2 days (or until compliance has been achieved) and file copies of them on site.
15. Assist the Superintendent in incident investigations, analysis and the preparation of accident/incident reports and summaries.
16. Submit all investigations to RSM, RSC, Site JHSC as well as Company JHSC.
17. Identify corrective action to be taken and inform the superintendent of necessary action required.
18. Maintain orientation and training records for workers – organized by trade contractors and ITC employees.
19. Ensure they contribute all updated records of training, certification and qualifications to ITC's head office and RSM/RSC.
20. PSC is to be knowledgeable of the Injury Management Program and ensure the injury Management Program is implemented correctly.
21. Contact the Regional Safety Manager and Injury Management Coordinator as soon after an ITC worker has sustained any injury as possible.
22. Email a copy of the First Aid Record to the Regional Safety Manager and Injury Management Coordinator by the end of the day.
23. Daily reporting to the Injury Management Coordinator as to the status of any worker involved in the Injury Management program.
24. The Site PSC is responsible for initiating the creation Safe Work Procedures for Specialized Work to be done on site.

25. The PSC, site supervisor and workers are to participate in the creation of the site-specific Safe Job Procedure. Anticipate, identify and evaluate hazardous conditions and practices.
26. Develop hazard control designs, methods, and procedures.
27. Develop and promote an active safety culture.
28. Implement, administer and advise others on hazard controls and hazard control programs.
29. Measure, audit and evaluate the effectiveness of hazard controls and hazard control programs.
30. Monitor and enforce health and safety expectations and requirements.
31. Ensure adequate Emergency Response Systems are established, tested and communicated.
32. Effectively communicate and consult with others regarding OHS hazards and risks.
33. Engage with sub-contractors in their OHS performance management.
34. Understand and apply workers' compensation and case management principles.
35. Provide safety leadership and manage staff and sub-contractor OHS performance.
36. Cooperate in the development of Site Safety and Fire Safety Plans for the site they are assigned to. Post them in prominent locations and ensure they are updated to reflect the existing job site as it progresses.
37. Deal directly with those involved in unsafe situations. Order work to be stopped and immediately advise superiors.
38. Intercede immediately in cases of refusal to work in unsafe conditions.
39. Ensure the ITC non-compliance policy is administered and assist superintendents in addressing safety violations as mandated in the ITC disciplinary procedure.
40. Attend all job site safety committee meetings, post meeting minutes until the next meeting, and include copies of minutes to company JHSC.
41. Ensure the participation of sub-contractors on the site safety committee.
42. Examine/sign the crane logbook(s) and riggers log book(s) on a weekly basis, ensuring their direct supervisor has reviewed and signed the logs as required by the company.
43. Maintain an inventory of all safety equipment on the work site.
44. Inspection of Fire Extinguishers monthly.
45. Maintenance of Fire Extinguishers on site in accordance with the local, Regional, and national Fire Code Legislation.
46. Prepare a monthly summary report of all incidents/accidents and near misses, first aid statistics, and all other information as required on the Monthly Safety statistic Report form for the project team to review.
47. Maintain and submit by no later than 5th of each month a Project Safety Report Checklist to the Project Manager. Compiling all information regarding Trade Contractors on site including information confirming their completion of safety requirements and submission of safety documentation.
48. Assist Trade Contractors with safety compliance by providing guidance and information.
49. Maintain SDS inventory and a master list for all (and only) hazardous materials on site.
50. Obtain and maintain records for all ITC and sub-contractor site-specific safe work procedures.

NOTE: Where there is no PSC assigned, the Superintendent will take on this responsibility.

First Aid Attendants

On all jobs, the Superintendent shall assign adequate personnel to provide adequate first aid as required by Regional Legislation and the ITC Health and Safety manual. The person(s) appointed shall hold valid certification as required. The first aid attendants shall avail themselves of upgrading as provided by Regional Legislation and ITC.

1. Ensure that no other duties supersede their responsibilities as a first aid attendant.
2. Always deliver first aid professionally and maintaining the patient's confidence.
3. Maintain a full first aid station or room that is clean, tidy and ready for service always.
4. Report to the direct supervisor of any worker, prior to referring any worker to medical aid.
5. Administer first aid as required within their scope of training.
6. Ensure the correct form is filled out as required.
7. The first aid treatment record is to be completed for all first aid injuries.
8. Any medical aid treatment case must be documented on the Patient assessment Chart as well as the first aid treatment record.
9. Maintain a first aid log.
10. Where an ITC employee is seen for a first aid injury the first aid attendant must call the Injury Management Coordinator immediately to ensure proper implementation of Recover at work program.
11. Where an ITC employee requires further treatment and is sent to medical aid, the first aid attendant will contact the Injury Management Coordinator immediately to ensure the Injury Management Program is implemented without delay.
12. Ensure all first aid reports for all ITC employees are submitted to the RSM as soon as possible.
13. Each first aid attendant is to be familiar with the Injury Management Program.
14. Ensuring the Claims Management Program is implemented correctly.
15. Assist the PSC when necessary, and report all unsafe conditions and practices observed.
16. Ensure that the first aid room supplies are maintained as the Regulation requires. Report any Items required to the PSC.
17. Provide health education materials or instruction to all on-site employees as required.
18. Maintain an updated Safety Data Sheet set in, or as close as possible to, the First Aid Room and ensure that the SDS Master list is accurate and updated for all hazardous materials on the site.
19. Training for blood borne pathogens will be provided and attendants are to follow the strict precautions outlined in the Biohazards plans.
20. Will sign Confidentiality agreement letter.

Trade Contractors**Purpose and scope:**

All trade contractors who perform work for ITC are required to comply with all Municipal, Provincial and Federal laws and regulations. Specifically, this includes the requirements of provincial regulations, and any other regulations, codes or standards that govern the health and safety of workers or employees.

Trade contractors are further required to follow the guidelines of the ITC HSE program and Trade Contractor Program components. Where the trade contractor states that they have their own safety program and/or safe work procedures in place, copies of those documents must be submitted to ITC for review and retention on file. Where the trade contractor's safe work procedures and/or safety program provides a level of protection that is lower than ITC's, the higher level of safety shall prevail.

Contractor superintendents/foreman are responsible for the safety of their workers and assure compliance with their own, and ITC's project specific HSE program. All employers must ensure compliance with all Federal Laws, Alberta OH&S Act, Code, and Regulations and / or WorkSafeBC Regulation and Legislation.

Contractors are also required to ensure a full-time superintendent/supervisor/foreman is always on site who is competent in fulfilling these duties.

Contractors are required to have their own HSE program which meets legislative standards and regulations, and industry standards. A copy of the HSE manual must be provided to the site ITC management team prior to commencing work.

1. All Trade Contractors are required to conduct their company safety orientation with their employees prior to commencing work on an ITC project. Employee Orientation documentation must be submitted to the Site PSC.
2. Ensure each worker receives the ITC project safety orientation prior to starting work.
3. Conduct daily job hazard assessments prior to work activity and provide or make available a copy to the ITC site safety coordinator.
4. Provide ITC all safe work procedures for any tasks.
5. Provide ITC documented training of workers on site including in any specialized PPE; respirator fit testing, fall Protection, etc.
6. Conduct weekly HSE meetings with workers, documenting the meeting and submitting a copy to the site PSC.
7. Ensure good housekeeping is maintained by crew.
8. Maintain compliance with site rules, and responsibilities identified in this manual.
9. All contractors are to enforce discipline according to their company's health and safety disciplinary protocols. Contractors are to provide documentation to ITC of any discipline for the site records.
10. Provide interpreter at time of orientation for any worker(s) requiring interpretation/translation of the rules and responsibilities addressed in the site orientation.
11. Identify all Young workers to the site PSC, provide all Young workers training and supervision required as per regulation.
12. Report all incidents and injuries immediately to the site Superintendent and ITC safety Coordinator.
13. Investigate any incident/injury and submit report to ITC site team.
14. Confirm with the ITC Superintendent any proposed work beyond regular working hours.

15. Attain and follow rules stipulated on the extended hours work permit issued by the Superintendent.
16. Attend weekly trade meeting set up by ITC superintendent.
17. Trade contractors must always comply with ITC's HSE Policies.

Specific Requirements/Criteria:

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

1. To comply with all Federal and Provincial safety laws, rules, regulations, policies and procedures while working on an ITC site.
2. To ensure that they understand all requirements which are applicable to their work activity prior to commencing that activity. Where the contractor or consultant is unsure, they should contact the ITC Superintendent.
3. To obtain the proper authorization and/or work permits prior to commencing any work activity.
4. Where work requires entry into a confined space the trade contractor or consultant shall ensure that all persons engaged in that work activity have received proper training in confined space entry procedures and the necessary equipment to perform that work or any rescue activity is on site at all times.
5. To maintain in a safe operating condition, all contractor equipment brought on site. To comply with Provincial Electrical Safety Branch regulations, all electrical equipment must be certified to CSA standards. ITC reserves the right to remove or ban faulty and/or unsafe equipment, or equipment not complying with the necessary approval requirements.
6. Only authorized persons shall operate cranes and hoisting equipment brought onto an ITC job site. Operators shall inspect the hoisting equipment at the beginning of each shift and shall test limit-switches, brakes, circuit breakers, and other control devices. Any defects that are identified that affect the safe operation of the equipment will require the equipment to be removed from service until the defects are repaired.
7. Where a contractor encounters what is believed to be MATERIALS CONTAINING ASBESTOS, ITC shall immediately be informed and the Contractor shall cease operations until it can be assured that standard practices for asbestos management are being complied with.
8. Where a contractor encounters any potentially hazardous or toxic substance that may endanger any person, ITC must immediately be informed and the trade contractor must cease operations until it can be assured that standard practices for hazardous materials management are being complied with.
9. The trade contractor shall indemnify and hold harmless ITC from any claims arising from any breach or alleged breach of human rights legislation, privacy legislation or workplace health and safety. This indemnity shall include costs on a solicitor / client basis for any defense costs required.
10. All workers must wear a full body harness while operating a scissor lift and be secured to an approved anchor point.
11. All workers must always have in their possession suitable hand protection for their task.