MAXIMUM MECHANICAL SERVICES

Health, Safety and Environment Manual

Disclaimer

The Health, Safety and Environment Management System (HSE-MS) detailed in this publication includes the policies and procedures for Maximum Mechanical Services Ltd. and its affiliates and is applicable within all organizations except where prime contractor or legislation require more stringent measures.

Acronyms/Abbreviations/Terms

The following acronyms, abbreviations or terms are used throughout this manual:

Maximum Mechanical Services or "The Company" or "We" or "Our" - Maximum Mechanical Services

BBO	Behavioural Based Observations
COR	Certificate of Recognition
ERP	Emergency Response Plan
HSE	Health, Safety and Environment
HSE-MS	Health, Safety and Environment Management System
IMS	Incident Management System
JHSC	Joint Health Safety Committee
HS Officer	Health and Safety Officer
LOTO	Lock Out/Tag Out
LTIF	Lost Time Injury Frequency
LWC	Lost Workday Cases
MOC	Management of Change
MTC	Medical Treatment Case
OH&S or OHS	Occupational Health & Safety
PPE	Personal Protective Equipment
RWC	Restricted Work Case
SSEP	Site Specific Environmental Plan
TDG	Transportation of Dangerous Goods
TRIF	Total Recordable Injury Frequency
WCB	Workers' Compensation Board (Alberta)
WHMIS	Workplace Hazardous Materials Information System
CSA	Canadian Standards Association
ANSI	American National Standards Institute

SWP	Safe Work Practice
JHA	Job Hazard Assessment
FLHA	Field Level Hazard Assessment
SJP	Safe Job Procedure
DER	Designated Employer Representative
COAA	Construction Owners Association of Alberta
PDA	Physical Demands Analysis
GHS	Global Harmonized System of Classification and Labelling of Chemicals

Health, Safety and Environment Manual

Table of Contents

Disclaimer

- Acknowledgement of the HSE Management System
- Acknowledgement of Alcohol and Drug Program
- Health and Safety Policy
- Workplace Violence and Harassment Policy
- Discipline Policy
- **Communications and Training Policy**
- Personal Protective Equipment Policy
- Incident Management Policy
- Alcohol and Drug Policy
- **Inspection Policy**
- Preventative Maintenance Policy
- Vehicle/Driving Policy

Fit for Duty Policy

Return to Work Policy

- Section 1 Organization and Responsibilities
- Section 2 Health and Safety Representatives
- Section 3 Subcontractor Safety Management
- Section 4 Hazard Assessment and Control Process
- Section 5 Emergency Preparedness
- Section 6 Incident Management Program
- Section 7 Personal Protective Equipment (PPE)
- Section 8 Safety Orientation, Training and Communication
- Section 9 New to the Workforce and Employee Mentoring Program
- Section 10 Company Safety Rules
- Section 11 Inspections
- Section 12 Preventative Maintenance Program
- Section 13 Records and Statistics
- Section 1 Alcohol and Drug Program
- Section 15 Fit for Duty Program
- Section 16 Fatigue Management
- Section 17 Disability Management Program

Health, Safety and Environment Manual

Table of Contents...continued

- Section 18 Environmental Management Program
- Section 19 Workplace Violence and Harassment Program
- Section 20 Working Alone Program
- Section 21 Transportation Light Vehicles
- Section 22 Codes of Practice, Safe Work Practices and Procedures

Health, Safety and Environment Manual

Update/Review Log

DATE	SECTION	REV No.	REVISION DATE	REVIEW	SIGNATURE
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Acknowledgement of the HSE Management System

I acknowledge that it is my responsibility as an employee to review and comply with Maximum Mechanical Services' Health, Safety and Environment Management System (HSE-MS) Manual.

As an employee of Maximum Mechanical Services, I will use this manual as a resource to work safely by following all company rules, safe work practices, procedures and applicable legislation.

I acknowledge that every action I take reflects on Maximum Mechanical Services. As a representative of Maximum Mechanical Services, it is my responsibility to follow policies reflecting co-operation, respect, knowledge and integrity.

I acknowledge and accept that I alone am responsible for my actions and conduct with respect to health and safety at the workplace. It is my responsibility to demonstrate good working relations with other employees, owners and prime contractors.

Use of this HSE-MS throughout all Maximum Mechanical Services' operations is required to ensure that standards, policies and practices are applied consistently to all aspects of our business.

By signing this document, I agree to follow Maximum Mechanical Services' HSE-MS.

Employee/Contractor Name (Print)

Employee/Contractor Signature

Manager or Supervisor

Date

MMS-HSE-MS-V.5 - September 7, 2022

Acknowledgement of Alcohol and Drug Program

All employees are expected to work safely, to follow policies, procedures and other written Health, Safety and Environment (HSE) directives including the Alcohol and Drug Work Rules, while performing assigned tasks at all Maximum Mechanical Services worksites.

Alcohol and Drug Work Rules

The following are Maximum Mechanical Services' Alcohol and Drug Work Rules:

- No employee shall distribute, possess, consume or use alcohol or drugs on any company worksite.
- No employee shall report to work or be at work under the influence of alcohol or drugs that may or will affect their ability to work safely.
- No employee shall test positive for any alcohol or drugs at concentrations equal to or in excess of the concentrations set in the Alcohol and Drug Program.
- No employee shall misuse drugs while at work. If an employee is taking prescription or nonprescription drugs for which there is a potential unsafe side effect, they have an obligation to report it to their supervisor.

If any employee has concerns about alcohol or drugs for themselves or another employee, they will raise the concern with their Supervisor.

Confidentiality and Record Keeping

All alcohol and drug test results will be maintained in a secure manner and will be released only to management of Maximum Mechanical Services. Confidential information from a Substance Abuse Professional will be handled in accordance with Personal Information and Privacy Legislation, Health Information Legislation and Canadian human rights legislation. Information such as type of substance, quantity or addiction shall not be disclosed to any other party at any time.

Acknowledgement

All employees will acknowledge that they are aware of Maximum Mechanical Services' Alcohol and Drug Program Work Rules. Management shall respect the protection surrounding the collection, use and disclosure of personal information about employees by ensuring confidentiality of information and ensuring employees be treated with dignity and respect in the application of the Alcohol and Drug program.

Employee/Contractor Name (Print)

Employee/Contractor Signature

Manager or Supervisor

Date

MMS-HSE-MS-V.5 - September 7, 2022

Health and Safety Policy

Maximum Mechanical Services' Health, Safety and Environment Management System (HSE-MS) demonstrates our commitment to protect and promote the safety and well-being of employees, visitors, communities, property and the environment.

We are committed to act responsibly and proactively on environmental, social, health and safety issues. Maximum Mechanical Services will strive to protect and maintain the health and safety of all employees, including any physical, psychological and social well being. All business will be conducted in a manner that is consistent with the values and behaviours expressed in the Policies and Procedures in this manual.

In fulfilling this commitment to protect persons, equipment, property, materials and environment, Maximum Mechanical Services will:

- Provide and maintain a safe and healthy work environment, in accordance with industry standards and in compliance with legislative requirements.
- Strive to eliminate or control any foreseeable hazards which may result in property damage, accidents, personal injury or illness.
- Employ personnel with knowledge, skills, training, and equipment required to complete their job in a safe and satisfactory manner.
- Utilize practices and procedures which meet regulatory or recognized industry standards.
- Minimize and prevent occupational injuries and illness, through proper work planning, health and safety training, hazard identification, inspection and incident investigation.
- Establish policies, practices and procedures that are compliant with applicable legislation, regulatory requirements and recognized industry best practices.
- Encourage the active involvement and support of employees at all levels within the organization in promoting and implementing an effective HSE-MS.
- Ensure that all Health and Safety information is readily available to all employees.

The Senior and Middle Management will ensure and enforce compliance with all policies, procedures and applicable legislation. Compliance will be achieved through leadership, mentorship and resource allocation.

Supervision will ensure a safe working environment by promoting the Health, Safety and Environment Management System through effective leadership, mentorship and training of all employees.

Employees are responsible and accountable for providing a safe working environment by actively demonstrating safe work behaviours and positive attitudes.

All employees share the company's genuine commitment to health and safety, supported by a firm, fair and consistent enforcement of policies.

Active participation in the HSE-MS will assist Maximum Mechanical Services in achieving the objective of zero injury. Maximum Mechanical Services is committed to providing a positive and safe work environment for everyone.

This policy shall be reviewed annually to ensure that it remains relevant and effective to the needs of the company. Objectives and targets can be set for the evolution and improvement of the HSE-MS. This policy will also be communicated to all employees and others working on behalf of the company. It will be posted in each office, facility and work areas.

444

Gord Alexander / Owner

Date

Workplace Violence and Harassment Policy

It is the policy of Maximum Mechanical Services to provide all its employees a worksite free of harassment and violence. **There is a Zero Tolerance Policy with workplace violence, harassment, or bullying.**

Maximum Mechanical Services is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of violence/harassment and ensuring that all employees feel safe and are provided with all the opportunities to succeed.

Maximum Mechanical Services employees are obligated to take reasonable care to protect the health and safety of themselves and others under this policy and this includes:

- Not engaging in bullying and harassment of other employees, the employer or any person.
- Acting on behalf of the employer.
- Reporting if bullying and harassment is observed or experienced in the workplace.
- Applying and complying with the employer's policies and procedures on bullying and harassment.
- Complying with any and all corrective actions issued in writing or otherwise.

Maximum Mechanical Services recognizes the potential for workplace violence, harassment, bullying or other aggressive behaviours directed at employees working on Maximum Mechanical Services's behalf. Maximum Mechanical Services will not tolerate inappropriate conduct or abusive behaviour directed at any employee. Maximum Mechanical Services will act fairly, swiftly and decisively to protect employees from workplace violence, harassment or bullying. Complaints will be investigated swiftly with respect for the confidentiality and sensitivity of the situation.

This policy is not intended to discourage an employee from exercising rights pursuant to any other law, including any provincial human rights act.

Gord Alexander / Owner

Date

MMS-HSE-MS-V.5 - September 7, 2022

Discipline Policy

Purpose

The purpose of this policy is to establish a framework for applying and documenting employee corrective action. The intended purpose of employee corrective action is to provide an employee feedback and advanced notice, if appropriate, of unsatisfactory work-related conduct or performance in order to afford the employee an opportunity to correct or improve their behaviour or conduct should there be an issue in the workplace.

Scope

This policy applies to all Maximum Mechanical Services employees, contractors, suppliers, etc.

Corrective Actions and Progressive Discipline Sequence

Over the course of a person's employment, there may be times when an employee's actions or conduct does not meet the expectations of Maximum Mechanical Services. This policy outlines a series of corrective actions that are available to management and supervisors to ensure that employees are given the opportunity to improve less than acceptable conduct and/or performance. The available steps include coaching and counselling, verbal warning, written warning, final written warning and termination. Although corrective action may be described as progressive in nature, the corrective action steps undertaken may vary depending on the nature of the problem or the circumstances. Depending on the circumstances specific to the individual situation or past work history, the process may be accelerated or steps in the progressive discipline sequence may be skipped to assign the appropriate level of discipline.

Any corrective action should reflect the seriousness of the conduct and may involve some combination of the following stages in this progressive discipline sequence:

Coaching/Counselling – This is often most effective when done informally and, in the event of unsatisfactory behaviour or performance, is necessary so that the employee realizes what is expected in terms of improvement. Ideally, counselling is conducted before the misconduct or work performance problem reaches a serious level. Counselling may be provided more formally with a senior/middle management member or other third party and discussing the performance with the employee if necessary. Counselling with employees relative to personal problems should be avoided. Professional counselling is more appropriate when alcohol, drugs or personal problems are the source of an employee's work-related problem.

Verbal Warning – Is a formal meeting between an employee and their supervisor and, if necessary management representative to discuss a work-related performance or conduct issue and the action to be taken to correct the problem. Employees should be informed that the verbal warning is disciplinary in nature and that failure to improve will result in further discipline. Formal documentation of corrective action begins with this step.

Written Warning – Is a meeting, usually subsequent to a verbal warning, between an employee and their supervisor and if necessary, a management representative to discuss a work-related performance or conduct issue and the action to be taken to correct the problem. A plan of action may be prepared to correct the problem specifying a date on which progress will be reviewed. Employees should be informed that this warning is disciplinary in nature and that failure to improve will result in further discipline up to and including termination.

Final Written Warning – In most circumstances this is the final step before terminating the employee. A supervisor and, if necessary, a Senior/Middle Management representative communicates to an employee in writing the unacceptable behaviour or conduct including specific improvements required and a time frame for making these improvements. The employee will also be informed that consequences of inadequate improvement in their performance and conduct will result in the termination of employment.

To ensure that a final written warning is appropriate and uniformly applied, senior management must approve this action prior to meeting with the employee.

Prior to an employee being issued a final written warning, the Supervisor should consult with Senior Management. If an employee is removed for being under a final written warning, the Supervisor should forward supporting documentation to Senior Management to be placed in the employee's personnel file.

Termination – For very serious misconduct, termination may be the appropriate first corrective action step. However, in most cases termination is imposed when other attempts to correct the problem, have failed. Management must approve this action prior to meeting with the employee. Management should attend the termination meeting with the employee and their supervisor.

Examples of Serious Misconduct – These instances are when the behaviour of the employee is sufficiently damaging to Maximum Mechanical Services to have "just cause" to terminate the employee without notice or pay in lieu of notice. These infractions are serious in nature and may include, but not limited to: theft, falsifying records or information, failing to work in a safe manner and/or fighting.

Modifications – Supervisors, with the approval of Senior Management, may modify the above steps of progressive discipline sequence to reflect the circumstances including the employee's seniority or employment history. Modifications may include additional warnings and accelerated corrective action as appropriate.

Procedure

Approvals

When corrective action is not appropriately documented, not consistent or unfairly applied, it can expose a company to significant legal liabilities including claims for wrongful dismissal. Therefore, Senior Management must approve in advance any final written warning or termination.

Documentation

With the exception of counselling, each step must be fully documented, utilizing Maximum Mechanical Services' Corrective Action Report and forwarded to Senior Management to be included in the employee's official personnel file. The Corrective Action Report should be signed and dated by the employee and their Supervisor. The employee should also be given the opportunity to provide comments on the document. All employees' requests to obtain a copy of their corrective action document(s) should be forwarded to management.

In the event an employee indicates that they will not sign the document during a meeting, the supervisor should note that fact on the Corrective Action Report and sign their name in the presence of a witness. Preferably, the witness would be a member of Senior/Middle Management or the Owner.

Investigations/Suspensions

Supervision will conduct an investigation of all reported infractions and recommend the appropriate corrective action to Senior Management. Suspension with pay of the employee under suspicion is usually the preferred immediate action until an investigation is completed. Such investigations should be timely. Ordinarily, an investigation should not take more than five (5) business days.

Extenuating Circumstances

There may be occasions when a situation occurs and there is no one to assist the Supervisor in the corrective action process. Further, some serious circumstances may require immediate action. Under these circumstances, the priority for the supervisor is the immediate safety of all employees. In such cases, the Supervisor should immediately suspend the subject employee until an investigation can determine the circumstances of the episode. The supervisor should inform the subject employee with a witness present if at all possible. The subject employee should be escorted off company premises or, if applicable, the police called and the employee taken into custody. Once the employee is confirmed as off the premises, the Supervisor should ask for written witness statements from all those who witnessed the alleged act and the subsequent suspension.

Employee Compensation

Corrective action meetings will be held during the employee's established working hours and on company premises. Meetings will not be held during break times, lunch periods or any other paid or unpaid rest time given to the employee.

In the event the employee is paid on an hourly basis and if business dictates that corrective action meetings occur before or after the employee's established working hours, the employee will be compensated for the period of time spent in the meeting.

Confidentiality

Any discussion or documentation involving corrective action of an employee must be held as strictly confidential and only be given to, and used by, appropriate decision-makers on a need-to-know basis. All original documentation must be forwarded to Senior Management to be maintained in the employee's personnel file.

This policy will be communicated to all employees and others working on behalf of the company during Safety Orientation. It will also be posted in each office, facility or work area.

444

Gord Alexander / Owner

Date

Communications and Training Policy

Purpose

Communications and training at all levels of the company is a vital component of the Health, Safety and Environmental Management System (HSE-MS). Maximum Mechanical Services will address and evaluate program performance annually along with the goals and objectives pertaining to the HSE-MS program improvements.

The communication component will be delivered using the following:

- Toolbox/tailgate meetings •
- Hazard assessment and control •
- Safety meetings •
- Industry-specific bulletins and company memorandums •
- Post-incident reviews
- Learning from incidents
- . Work site Inspections

Training will include:

- Orientation
- Specialized PPE
- Emergency response •
- Hazards present on the work site •
- Task specific training when required

Prior to commencing work or tasks, employees must review and acknowledge the job-related activities, duties and responsibilities. This could be in the form of company specific, client specific and site specific orientations.

If any employee is in doubt about their safety role or responsibilities, they are to contact their supervisor for clarification before starting or continuing any work-related activities.

Supervisors have the responsibility to ensure employees are competent to undertake the task safely and follow correct procedures.

444

Gord Alexander / Owner

Date

MMS-HSE-MS-V.5 - September 7, 2022

Personal Protective Equipment Policy

Purpose

Maximum Mechanical Services is committed to ensuring all employees adhere to the Personal Protective Equipment (PPE) Policy as per legislation and other regulatory requirements. Maximum Mechanical Services will confirm that the use of PPE does not itself endanger the employee.

Maximum Mechanical Services is responsible for ensuring employees are aware of the necessity of PPE and appropriate clothing as in accordance with CSA Standards. PPE will be provided when considered necessary due to the specific demands of on-site job conditions. Company employees will wear the following minimum required PPE at all times when on site, as required:

- Steel toed boots (minimum 6 inches in height as per client)
- Hard hat (client specific as per job scope)
- Safety glasses
- Hearing protection (appropriate to the task)
- Gloves (appropriate to the task)

Additional required PPE will be determined via the Hazard Assessment and Control Process, as well as through review of the applicable Safe Work Practices, Safe Job Procedures and Codes of Practice.

Employees are responsible for adhering to the requirements for proper fitting, use, care, maintenance and storage of PPE, and training in these areas will be carried out. Supervision will instruct employees to select and use equipment appropriate to the hazards on the work site and to follow the manufacturer's specifications for the fitting and wearing of PPE.

It is essential that employees understand the situations which require PPE and safety equipment. Employees will not use equipment that is not in safe working condition to perform the function for which it was designed. PPE that has been removed from service due to damage or expiry will be destroyed or tagged "Out of Service." Any PPE tagged in this way will not be returned until it is repaired and inspected by a qualified competent person.

Employees have the responsibility to wear and use the correct PPE as intended and within its limitations or capacity.

Gord Alexander / Owner

Date

MMS-HSE-MS-V.5 - September 7, 2022

Incident Management Policy

Purpose

The purpose of this policy is to enable the detailed instructions and directive regarding post incident activities.

Maximum Mechanical Services will ensure that all incidents are investigated to determine steps to be taken to prevent recurring incidents resulting from the same or similar hazards.

This standard is based on three facts:

- 1. Incidents are caused.
- 2. Incidents are prevented if cause is eliminated.
- 3. If causes are not eliminated, incidents will happen again.

Corrective actions will be taken to address substandard conditions and behaviours that may have contributed to the occurrence of the incident and the severity of the incident.

Incidents to be reported and investigated, based on management direction, are:

- Near misses (based on potential severity). •
- First aid and medical aids.
- Equipment and property damage.
- Environmental spills or environmental contamination. •

Supervisors are responsible for conducting a preliminary investigation and recording the findings. For more serious incidents, the supervisor is responsible to ensure that The Owners is contacted. The Owners must ensure investigations are conducted, causal factors are identified, root causes are identified and corrective actions are assigned to persons with the authority to act.

Incidents will be reported to governmental agencies and departments where required by legislation.

Incidents will be reported to clients in accordance with client requirements.

Injury incidents will be reported, documented and forwarded to the Workers' Compensation Board as per the Workers' Compensation Board Act.

444

Gord Alexander / Owner

Date

MMS-HSE-MS-V.5 - September 7, 2022

Alcohol and Drug Policy

A strong commitment exists to ensure all employees are provided with a safe, healthy and respectful workplace. This commitment extends to the safety of contractors and the general public.

The inappropriate use of alcohol and drugs can have serious adverse effects on the safety and well-being of employees, contractors and the public. Awareness of the potential risks associated with the use of alcohol and drugs is a vital first step in providing a safe, healthy and reliable workplace.

The objective of the following alcohol and drug guidelines and the alcohol and drug work rule is to address risks (safety, health, environmental and operational incidents) to which alcohol and drug use may be a contributing factor.

Alcohol and Drug Work Rule

The alcohol and drug work rule, with which employees are expected to comply for the common good is straightforward:

- Do not use, possess or sell drugs on company property, or at company workplaces.
- Do not report to or work on the worksite if concentrations of alcohol or drugs exceed the cut-off limits specified in the policy.

Employees are expected to report Fit for Duty, and remain fit throughout their workday or shift. If an employee is at work and thought to be unfit, they will be sent home. If unexpected circumstances arise where an employee is requested to perform services outside of their regularly scheduled hours or when designated to be "on-call" and they have recently used recently consumed alcohol, over the legal limit, or used drugs, the employee or drugs, the employee is expected to inform their Supervisor, who will reassign the work.

Our clients reserve the right to conduct unannounced searches and seizures of alcohol and drugs on their premises, if they have reasonable and probable cause grounds to believe that they may be present.

Testing

Testing for substance use may be conducted if there is reasonable cause, and after all "significant work-related" or "high potential" incidents. Testing will be conducted as soon as reasonably practicable and employee should be under supervision until testing is complete. Care and custody of the worker must be maintained. Employees are not to consume alcohol within the first eight hours after an incident or until, tested or until they are advised a test is not required. In any situation where a reasonable cause test cannot be done, the employee will not report for duty until an investigation has been completed. Testing and limits shall be conducted in accordance with the Canadian Model Version 06.

Failure to report directly for a test, refusal to submit to a test, refusal to sign the required acknowledgment form, refusal to agree to disclosure of a test result to management, or a confirmed attempt to tamper with a test sample are all considered violations of this policy and are grounds for disciplinary action up to and including termination of employment.

The company selected to perform our tests uses accepted methodology and have trained collectors and testing facilities in accordance with those parts of the U.S. DOT Workplace Drug and Alcohol Testing Programs in force as of the date of this publication, which relate to testing procedures in laboratories. For screening purposes, a laboratory certified by the United States Department of Health and Human Services is permitted to test samples under this policy. Each of our clients may have unique testing standards, i.e.; drugs tested for, cut off levels, etc. Tests will conform to the highest level of requirements.

Maximum Mechanical Services may use a point of collection test (POCT) as one of a number of options for assessing the risk of having the employee return to work, pending the medical review officer's report on the oral or urine-based lab test. A POCT device used for this purpose must have Health Canada approval, must be intended for urine assessment only, and must be calibrated to the extent possible with the urine cut-off levels. Only collection personnel trained to U.S. DOT standards shall administer the POCT.

444

Gord Alexander / Owner

Date

Inspection Policy

Purpose

Inspections are a critical part of a comprehensive Health, Safety and Environment Management System (HSE-MS). They assist in controlling losses to individuals, equipment, materials and the environment through identifying and correcting unsafe conditions, events, acts and behaviours.

Monitoring includes locating hazards that could cause injury or damage and developing plans for corrective action. If inspection deficiencies are not analyzed for causes, core problems will usually not be addressed.

There are two classifications of inspections to be completed in the workplace:

- Formal Inspections Planned inspections that use established procedures, checklists and are • often on a set schedule.
- Informal Inspections – Ongoing inspections not on a set schedule, procedure or definitive checklist (such as the visual inspection of Personal Protective Equipment (PPE)).

All formal inspections will be documented and the information retained for three years. Maximum Mechanical Services will identify deficiencies and implement corrective action.

444

Gord Alexander / Owner

Date

MMS-HSE-MS-V.5 - September 7, 2022

Preventative Maintenance Policy

Purpose

This Policy is to ensure all tools, equipment, vehicles and office equipment used by Maximum Mechanical Services' employees are properly maintained according to manufacturer's specifications and regulatory policies to reduce or eliminate the potential losses from hazards arising from defects.

Maximum Mechanical Services is committed to creating a safe working environment, including supplying the correct tools and equipment for the task. Employees will take full responsibility for the proper and safe use of tools and equipment. It is essential that tools and equipment be operated in a safe manner and not be tampered with in any way.

All tools and equipment will be properly maintained in order to reduce injury to employees or damage to property. Supervisors will guarantee that only qualified, competent persons carry out all maintenance work and that all records are to be maintained and kept on file for three years.

Any tool or equipment found to be defective will be removed from service and clearly tagged "Out of Service" for either repair or disposal.

Vehicles must be inspected for operational and safety defects daily using the specified documents. Defects or damage found through inspection or operation must be reported as soon as possible. Vehicle logs must be updated daily and any repairs or maintenance work must be signed off by the competent person doing the work.

All employees are subject to tool and equipment inspection by the supervisor.

Gord Alexander / Owner

Date

MMS-HSE-MS-V.5 - September 7, 2022

Vehicle/Driving Policy

Every employee of Maximum Mechanical Services will operate any vehicle in a professional and courteous manner at all times.

- Speed limits and traffic regulations must be adhered to at all times.
- Driving habits will be adjusted to meet current road conditions.
- Vehicles will be operated in conjunction with any specific regulations on all lease roads.
- Operators must have a valid driver's license for the type of motor vehicle they operate.
- All drivers must provide a drivers abstract when requested.
- All drivers and passengers shall use the vehicle's seat belt at all times while operating a motor vehicle on company business.
- All cargo on or in motor vehicles must be adequately secured to prevent movement which could cause spillage, damage to the vehicle, or injury to the operator.
- Employees must not use hand-held cell phones while operating a motor vehicle and must obey all provincial anti-distraction laws.
- Vehicles must be kept clean.
- When the driver has determined that driving conditions are unsafe he/she will cease operating the vehicle immediately in the safest manner possible.
- Drivers will ensure that headlights are on at all times.
- Workers are not to transport or be in possession of any type of firearms while operating a company vehicle.
- All incidents and damage shall be reported to management immediately.
- All equipment will be inspected through a pre-trip inspection and have regular maintenance inspections completed as set out for each piece of equipment. This will be documented on appropriate forms and in the daily log for each piece of equipment.
- No worker will drive a vehicle that is unsafe and will report any defects to the supervisor.
- The use of alcohol or illegal drugs by either the driver or passengers of a company vehicle is strictly prohibited. Contravention of the policy will result in disciplinary action up to and including termination of employment.
- Company vehicles are to be used exclusively for business purposes only.
- The following equipment must be in vehicles:
 - First aid kit
 - Minimum 10 lbs fire extinguisher
 - Flags, flares, reflective triangles
 - Means of communication

A driver of a commercial vehicle shall inform the carrier responsible for that vehicle of any defects or deficiency that would affect the safe operation of the vehicle. When a carrier receives a notice of defect in respect of one of his commercial vehicles, they shall repair or otherwise modify the vehicle, or cause it to be repaired or modified, in accordance with instructions provided by the manufacturer.

The driver of a commercial vehicle shall inspect it prior to operating it at the beginning of a work shift.

444

Gord Alexander / Owner

Date

MMS-HSE-MS-V.5 - September 7, 2022

Fit for Duty Policy

Maximum Mechanical Services provides a framework designed to ensure that employees are fit for duty at all times and provides the necessary education, experience, and training for you to do your job tasks.

- You may not enter or remain at a job site while under the influence of drugs or alcohol. •
- You must report to your supervisor all medications, over the counter and prescription, that could • impair your ability to perform work safely.

Responsibility

Both, Maximum Mechanical Services and its employees have a shared responsibility to ensure employees are fit for duty. As such, Maximum Mechanical Services monitors all employee's activities and behaviours and shall remove employees who are unfit for duty from the work site.

If an employee is determined to be unfit for duty, Maximum Mechanical Services may provide reasonable assistance to the employee. This may include, but is not limited to, transferring the worker to another role, providing a leave of absence, or providing assistance through Alberta Health Services: Addiction and Mental Health Helplines, AHS Programs and Services, as well as, encourage them to utilize the company benefit provider.

666

Gord Alexander / Owner

Date

MMS-HSE-MS-V.5 - September 7, 2022

Return to Work Policy

In fulfilling our commitment to provide a safe and healthy working environment, we have established this Return to Work Policy.

Maximum Mechanical Services accommodates injured workers through early assistance, rehabilitation, and placement where possible to the benefit the entire organization. Our program provides gradual and consistent rehabilitation to all injured workers.

Maximum Mechanical Services will work toward facilitating an injured worker to an appropriate and timely return to work in the pre-injury position. If this is not possible, we will make every effort to place the worker in a suitable alternate position. Attempts to place the worker in another position shall be done in co-operation with management, health care providers and the worker.

All personal information received from or about the worker will be held in the strictest of confidence. Information of a personal nature will be released only if required by law or with the permission of the injured worker who shall specify the nature of the information that will or can be released and to whom.

66

Gord Alexander / Owner

Date

MMS-HSE-MS-V.5 - September 7, 2022

Section 1 – Organization and Responsibilities

Purpose

The purpose of this section is to clearly describe and inform employees of their assigned responsibilities and accountabilities within the Health, Safety and Environment Management System (HSE-MS).

Definitions

IRS – **Internal Responsibility System** – The IRS is a system utilized to establish responsibility sharing, promote best practices and safety culture that helps develop self-reliance while ensuring compliance, within an organization, where everyone has direct responsibility for health and safety as an essential part of his or her job. It does not matter who or where the person is in the organization, they achieve health and safety in a way that suits the kind of work they do. Each person takes initiative on health and safety issues and works to solve problems and make improvements on a continual basis.

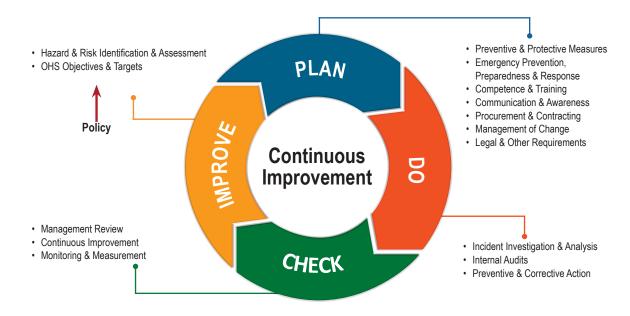
JHSC - Joint Health Safety Committee.

OHS/OH&S - Occupational Health & Safety.

General

Maximum Mechanical Services expects all employees to be actively involved in the HSE-MS by adhering to their roles and responsibilities.

The Internal Responsibility System is built on the premise that all employees play a role in the implementation of the HSE-MS within the organization. A system utilized to establish responsibility sharing, promote best practices and a safety culture that helps develop self-reliance while ensuring compliance.



Effective Date: Revision Date: Revision No.:

Roles

Each person is responsible for health, safety and environmental protection. All employees are to know their roles and comply with the requirements of their job description. The following positions are used in the HSE-MS.

- Senior Management
 - Owner
- Middle Management
 - Service manager
- Supervision
 - Field Leadership
- Employees
 - Field Staff
 - Office Staff

Responsibilities

All Employees

All worksite parties must adhere to these responsibilities as per legislation.

- All employees are to be aware and exercise their three (3) rights accordingly which are:
 - Right to know
 - Right to participate
 - Right to refuse
- Consult and cooperate with JHSC or health and safety representative and resolve issues in a timely manner.
- Cooperate with any person exercising duty under legislation.
- Ensure employees work in accordance/comply with legislative requirements.
- Ensure employees are not subjected to or participate in any harassment or violence as defined in legislation and company policy.
- Report OHS concerns.

Senior Management

In addition to the above, the senior management's responsibilities within the HSE-MS as well as the all employee section will include, but are not limited to:¹

- Provide strategic direction on the HSE-MS by setting and communicating annual health, safety and environment goals and objectives.
- Ensure an effective process is in place so all employees know their responsibilities and duties under applicable legislation, irrespective of whether or not they are actively engaged in work activities.
- Ensure a Disciplinary Policy is in place for management, supervisors and employees who are noncompliant with company policy and procedures.
- Participate in investigations as required.
- Participate in at least one work site inspection every quarter and conduct a worksite tour quarterly with the objective of having the focus of observing work and discussing safety with the worker(s) on the worksite.
- Ensure an effective process is in place so that any hazardous conditions identified from investigations and inspections are corrected as soon as reasonably practicable.
- Ensure a plan is in place to protect supervisors and employees in the case of identified potential emergencies including meeting the first aid requirements under the applicable *Occupational Health and Safety Act.*
- Ensure a Disability Management program is in place for the timely return to work of injured employees.
- Ensure an incident management process is in place to meet the reporting requirements under the *Workers' Compensation Board Act*, applicable Occupational Health and Safety Act and other applicable legislation.
- Ensure an effective process is in place for the confidentiality of medical and other personal information.

Middle Management

Middle management's responsibilities within the HSE-MS include, but are not limited to the following:^{2,}

- Develop and implement a plan to achieve defined annual goals and objectives.
- Pre-qualify subcontractors.
- Coordinate the safety meeting process to ensure the minimum frequency of meetings is being met.

¹ Alberta Occupational Health and Safety Act Part 1 - Obligations of Work Site Parties, Section 3, Obligations of Employers

² Alberta Occupational Health and Safety Act, Part 1 - Obligations of Work Site Parties, Section 3 - Obligations of Employers

- Coordinate the use of newsletters and safety bulletins so as to effectively communicate safety information and concerns.
- Verify the development, updating and communication of the job task inventory and the required job hazard assessments.
- Coordinate the development of required codes of practice, safe work practices and safe job procedures.
- Support the supervisors in the field level hazard assessment process.
- Support the PPE policy by ensuring the required PPE is available to the supervisors and employees.
- Hold periodic meetings to review health and safety activities including incident trends, including trends and opportunities for health and safety improvement.
- Support in the implementation of corrective actions identified during the inspection and incident investigation processes.
- Participate in at least one work site inspection every quarter and conduct a worksite tour quarterly with the objective of having the focus of observing work and discussing safety with the worker(s) on the worksite.
- Participate in investigations as required.
- Review reports of dangerous work for completeness including a review for timeliness following the execution of corrective actions.
- Assist supervision in the implementation of necessary action(s) to control and/or resolve any emergency situation that threatens employees.
- Coordinate the completion of emergency response drills within legislative time requirements.
- Report to government agencies as stipulated under the *Workers' Compensation Acts*, applicable provincial occupational health and safety legislations and other applicable legislations.
- Verify a consistent implementation of the disciplinary policy.
- Ensure they are competent to supervise employees.
- Lead, plan, direct and support safety initiatives and activities.
- Allocate sufficient resources to ensure the safety and protection of management, employees and sub-contractors on the worksite.
- Review investigation reports of incidents that result in incidents or near misses.
- Review health, safety and environment statistical trending to determine opportunities for improvement in the HSE-MS.
- Only allow pre-qualified sub-contractors to perform work on Maximum Mechanical Services. managed job sites.
- Ensure a hazard assessment and control process is in place to identify and control hazards on the worksite.

- Ensure an effective process is in place for the development of required codes of practice, safe work practices and safe job procedures.
- Ensure an effective process is in place for the selection, use and care of PPE.
- Ensure an effective process is in place so only qualified and competent personnel supervise tasks that could endanger employees.
- Ensure a training process is in place for all employees so that they are qualified and competent to perform their assigned tasks.
- Ensure a competency process is in place for all employees who operate equipment are trained and competent in the safe operation of the equipment.
- Ensure a preventative maintenance process is in place to confirm that all equipment used by employees will adequately perform functions it is designed to perform and is free of all defects.
- Ensure an inspection process is in place for the inspection of premises, equipment and work practices/methods at regular/appropriate intervals.

Supervision

Supervision's responsibilities within the HSE-MS include, but are not limited to the following:³

- Support the successful completion/attainment of annual goals and objectives.
- Select only employees who are trained with the required skills to perform the assigned job tasks.
- Assign a mentor to new employee until a mentor determines that is sufficiently trained to work alone.
- Assign a competent person to complete the required competency assessments on employee's ability to operate tools or equipment.
- Assess if an employee is fit for duty prior to assigning the employee a job task.
- Take all precautions to protect employees health and safety.
- Ensure employees use hazard controls and PPE.
- Advise employees of all known or reasonably foreseeable hazards.
- Verify that employees have implemented sufficient controls through the Hazard Assessment and Control process to manage hazards at risk levels as low as reasonably practicable.
- Lead Safety meeting agenda to ensure that the safety meeting is an effective tool to lead, direct and instruct employees.
- Lead, direct and instruct employees on the plan to safely complete assigned tasks.

³ Alberta Occupational Health and Safety Act, Part 1 - Obligations of Work Site Parties, Section 4, Obligations of Supervisors

- Communicate applicable codes of practice, safe work practices, and safe job procedures to employees as an administrative control to identify and control hazards.
- Lead, direct and instruct employees on the selection, care and use of PPE.
- Select equipment or tools appropriate or suitable for the assigned tasks.
- Coordinate the preventative maintenance program for maintenance of equipment, tools, vehicles and PPE.
- Stop work immediately until appropriate control measures are in place when an identified hazard(s) could cause an undue hazard exposure to an employee.
- Verify through inspection that all requirements under Maximum Mechanical Services HSE-MS are followed on worksite under their control.
- Participate in at least one work site inspection monthly and conduct a worksite tour quarterly with the objective of having the focus of observing work and discussing safety with the worker(s) on the worksite.
- Follow-up as soon as is reasonably practicable on any unsafe or harmful condition or action.
- Lead the investigation of reportable incidents.
- Follow-up as soon as reasonably practicable on action items identified as required through the inspection or investigation processes.
- Coordinates the execution of the emergency response plan.
- Test the emergency response plan through emergency response drills.
- Implement and support the return to work plan of injured employees.
- In conjunction with senior management, discipline employees who are non-compliant with company and/or site specific policy and procedures as a method of improving safety performance.
- Coordinate the safety meeting process to ensure the minimum frequency of meetings is being met. Determine the minimum training requirements by job title.
- Determine the minimum competency assessments required to operate different tools and equipment.
- Coordinate the inspection process to ensure the minimum frequency of inspections is being met
- Develop the emergency response plans and revise the plans, if necessary.
- Manage confidential medical and other personal information as required under privacy laws.
- Designate qualified and competent personnel to supervise tasks.

Employees

Employees' responsibilities within the HSE-MS include, but are not limited to the following:4

- Take reasonable care to protect the health and safety of yourself and others when on the worksite.
- Cooperate with employer or supervision or any other person to protect their health and safety.
- Participate in Maximum Mechanical Services HSE-MS in their assigned areas of responsibility.
- Adhere to Maximum Mechanical Services' policies, safe work practices, safe job procedures, and codes of practice for assigned tasks.
- Arrive for work fit for duty and remain in compliance with company drug and alcohol policy.
- Implement sufficient controls through the Hazard Assessment and Control process to manage hazards at risk levels as low as reasonably practicable.
- Use safety devices and wear PPE.
- Participate in safety meetings to create a healthy two way communication of safety related topics and concerns.
- Recognize their obligation to refuse dangerous work when they believe a hazardous condition exists and report the condition to the supervisor or management immediately.
- Participate in investigations as required.
- Perform pre-use inspections of tools and equipment.
- Remove from service and tag any tools, equipment, structures and PPE with major defects.
- Operate tools and equipment according to manufacturer specifications and training received.
- Report all hazards, unsafe conditions, near misses and any other incidents immediately to your supervision.
- Prior to starting work, ensure emergency response plan is understood and individual responsibilities known.
- Cooperate with all requirements of the Emergency Response Plan (ERP).
- Participate in emergency response drills as required.
- Support the return-to-work plan, if injured on the job site.
- Participate in any training required as requested by supervision.
- Advise employees of all known or reasonably foreseeable hazards.

Visitor

Visitor's responsibilities within the HSE-MS include, but are not limited to the following:

- Report to the Maximum Mechanical Services' Supervisor of the worksite.
- Follow instructions given by the site contact.

⁴ Alberta Occupational Health and Safety Act, Part 1 - Obligations of Work Site Parties, Section 5, Obligations of Workers

- Wear PPE as directed by the site contact.
- Attend a site specific orientation as directed by the site contact.
- Remain in visual distance of authorized personnel at all times while on the worksite.

Direct Service Provider (DSP)⁵

- Ensure a service provided to help a person meet an obligation under OHS legislation achieves that objective.
- Ensure the service complies with OHS legislation.
- Ensure the service is provided by a competent employee.
- Ensure the service does not create a hazard to others on the worksite or near the worksite.

Owners (of land or premises of worksite)⁶

(Excludes a private residence unless business located there)

• Ensure property and premises that is under their control does not endanger health and safety or any other person.

Contractors (person or group of persons who contract with and direct the work of employer or self-employed person)⁷

- Ensure the worksite and work processes under their control do not endanger health and safety.
- Advise prime contractor of the names of employers or self-employed persons working under the direction of the contractor.

Duty to Provide Health and Safety Information

Health and safety information is information that may affect the health and safety of a person on a worksite, but excludes personal information or confidential proprietary information.

- Management makes applicable information readily available to JHSC, health and safety representative or employees and the prime contractor.
- Prime contractor provides applicable information to employers, employees and other parties working at the worksite.
- Owner provides applicable information to employers, employees and other parties working on the property.

⁵ Alberta Occupational Health and Safety Act, Part 1 - Obligations of Work Site Parties Section 7, Obligations of Service Providers

⁶ Alberta Occupational Health and Safety Act, Part 1 - Obligations of Work Site Parties Section 8, Obligations of Owners

⁷ Alberta Occupational Health and Safety Act, Part 1 - Obligations of Work Site Parties, Section 11, Obligations of Self-Employed Persons

- Supplier provides manufacturers specifications and instructions for equipment and harmful substances.
- Management makes applicable legislation readily available at the worksite.
- Applicable reports, plans or procedures are in writing and readily available at the worksite.
- Applicable orders or notices are posted or readily available at the worksite.
- JHSC minutes are posted or readily available at the worksite.
- Any concerns about unsafe or harmful worksite conditions must be reported.



Obligation to Refuse Dangerous Work

Purpose

The purpose of this section is to establish guidelines to resolve health and safety concerns where an employee believes there exists an "undue hazard" to the health and safety of any employee present at the worksite.

Everyone has the obligation to refuse dangerous work. All employees, visitors, contractors and suppliers are equally responsible for complying with the requirements of the legislation.⁸

Employees will be educated on their three rights:

- Right to know the hazards,
- Right to participate in hazard assessment, and
- Right to refuse dangerous work.
 - including the procedures for refusing dangerous work.

Training may be performed in-house or by a third-party.

Workers on provincially regulated work sites have the right to refuse to carry out any work they reasonably think will put themselves, or others, in danger.

Asking a worker to work in a situation where there is a danger to health and safety is against provincial labour laws.

Work involving health and safety hazards that are not normal for the job is considered an undue hazard that could trigger a work refusal.

Definitions

Undue Hazard – An "undue hazard" will be defined to include "a hazard that poses a serious and immediate threat to the health and safety of a person.

Existence of Undue Hazard

An employee shall not carry out any work if on reasonable and probable grounds the employee believes that there exists an undue hazard to the health and safety of any employee due to:

- Operation of equipment, tools, machine or device.
- Condition of the worksite.
- Workplace Violence and Harassment.

⁸ Alberta Occupational Health and Safety Act, Part 4 - Dangerous Work and Discriminatory Action

- Unsafe procedure or process, Contravention of applicable legislation.
- Any other hazardous situation.

Right to Refuse Dangerous Work

- Maximum Mechanical Services will ensure workers understand the hazards at the workplace, know what needs to be reported and have the support to exercise their right.
- An employee may refuse to do work where they believe on reasonable grounds it is dangerous to themselves or others.
- The employee must promptly report the refusal to the employer or supervisor.
- Employers must investigate the matter.
- If Maximum Mechanical Services or supervisor cannot remedy the issue immediately, they must inspect the dangerous condition with the refusing employee and a member of the JHSC or health and safety representative to resolve the issue/remedy danger.
- If matter still not resolved, it may be referred to a provincial OH&S representative, who will resolve the matter.
- Upon investigation of the refusal, once the employer has deemed no hazard exists, another employee may be assigned to do work if they are advised of the refusal, the reason for the refusal, and advised of their right to refuse.

Work Refusal Procedure

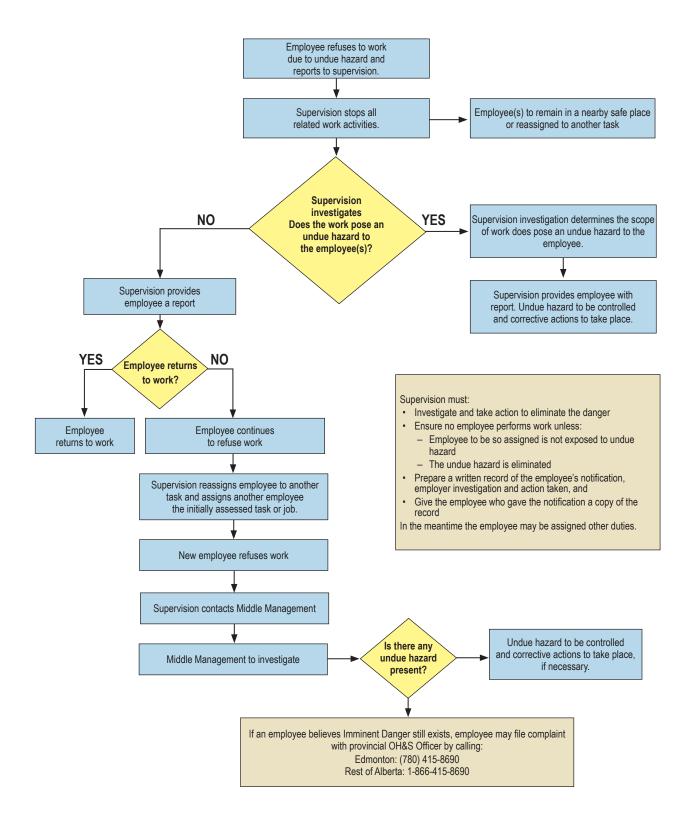
- 1. Employee will report refusal to work to their supervisor as soon as reasonably practicable and the reason for the work refusal must be documented.
- 2. Work related to the unsafe condition must be stopped and remain stopped until the concern has been addressed and corrected.
- 3. Employee will evacuate from the worksite to a safe location.
- 4. Investigate and take action to eliminate the undue hazard, if required.
- 5. Conduct a hazard assessment to ensure a plan is in place to control hazards to an appropriate level of risk.
- 6. The supervisor will document the employee's notification, the investigation and the corrective action taken.
- 7. The supervisor will provide the employee who gave the notification a copy of the employee's notification, the investigation and the corrective action taken.
- 8. Return to work if the "undue hazard" to the health and safety of the employees has been eliminated and/or the exposure to undue hazard does not exist.

Reprisals Prohibited

Any person who refuses dangerous work is protected by the applicable legislation and this policy from disciplinary action by senior management or supervision. Employee cannot be penalized, terminated, threaten, intimidated, coerced, disciplined, or suspended because of the notification of work refusals.⁹

⁹ Alberta Occupational Health and safety Act , Part 4 - Dangerous Work and Discriminatory Action, Section 35, Prohibition of Discriminatory Action





MMS-HSE-MS-V.5 - September 7, 2022

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Section 2 – Health and Safety Representatives

Health and Safety Representative (5 – 19 employees)

A Health and Safety Representative (HS Representative) works with Maximum Mechanical Services to identify and solve health and safety concerns at the worksite. The HS Representative also promotes awareness and interest in health and safety.

The HS Representative forms an important part of the internal responsibility system by creating mutual accountability for health and safety. The obligation for Maximum Mechanical Services to provide training to HS Representative helps ensure that both parties are aware of their roles and responsibilities in the workplace.

The HS Representative also provides support for the three basic rights that all employees have in protecting their health and safety:

- The right to know the hazards involved in their work,
- The right to participate in controlling those hazards, and
- The right to refuse dangerous work as is described in the provincial occupational health and safety legislation.

The HS Representative is chosen by the employees, unless prescribed by a union agreement.

Duties of Health and Safety Representative

The HS representative has the same duties as Health and Safety Committee Member, these include the following:

- Participating in the identification of workplace hazards as a result of site activities.
- Participating in the development and implementation of programs to protect the employee's safety and health.
- Receiving, considering, and making recommendations regarding employee complaints and suggestions concerning safety and health.
- Cooperating with an OHS officer exercising their duties under the provincial provincial occupational health and safety legislation.
- Developing and promoting programs for education and information concerning health and safety and checking the effectiveness of these measures.
- Making recommendations to Maximum Mechanical Services, prime contractor or owner respecting the health and safety of employees.
- Participating in all investigations relating to serious injuries, near misses, and incidents.
- Participating in site inspections regularly.

- Participating in resolving workplace refusals and work stoppages.
- Making recommendations to management and site owners for accident prevention and safety program activities.
- Maintaining records in connection with activities and meetings of the committee.
- Attending to other matters relating to the duties of the committee.
- Other duties as may be specified in the Provincial Occupational Health Legislations.

Maximum Mechanical Services, contractors and prime contractors have the following duties:

- Consult and cooperate with the HS Representative to develop policies, procedures and codes of practice for their worksite.
- Provide the HS Representative with reasonable opportunity to inform employees on OHS matters.
- Allow the HS Representative to examine records, policies, procedures, code of practices, reports or manufacturer specifications required under OHS legislation.
- Give information or documents to the HS Representative when addressed to them.

HS Representative Training

Maximum Mechanical Services must provide training to the HS Representative on their duties and functions of their responsibilities. Also, Maximum Mechanical Services shall permit the HS Representative, when given reasonable notice, to take the greater of 16 hours or the number of hours the employee normally works during two shifts, to attend worksite health and safety training programs, seminars, or courses.

Time away for Representative Work and Pay Entitlements

As HS Representative, the employee is entitled to take the following time as a part of their regular work duties:

- The time required for preparation of scheduled meetings for committee or meeting with Maximum Mechanical Services or Prime Contractor Representatives.
- Time required for attendance for scheduled meetings.
- Time required to receive health and safety training appropriate for their positions.
- And time given under provincial OHS legislation¹ that the committee or representative deems necessary to conduct their duties as required.

¹ Alberta Occupational Health and Safety Act, Part 3, Joint Work Site Health and Safety Committees, Section 30 (1)

During this time HS Representative are deemed to be at work and must be paid at their regular rate of pay.

Training Requirements

- Provincial health and safety committee and representative training
- Basic investigation training
- Hazard ID and assessment training
- Legislative awareness training

Hazard Identification

The safety committee plays an important role in keeping the workplace hazard-free by fulfilling the following:

- Ensuring representatives know how to recognize hazards and understand the basic principles for controlling them.
- Focusing on identifying hazards and unsafe acts and/or work conditions that can cause serious injuries.
- Conducting thorough workplace inspections at least monthly.
- Documenting hazards during monthly inspections and discuss how to control them at regular safety committee meetings.
- Including Maximum Mechanical Services and employee representatives on the inspection team.

Accident Investigation

It is necessary for a committee member to be a part of the investigation team to conduct accident investigations or to participate in investigations for serious or potentially serious incidents. The committee must also carefully review accident reports to help management identify accident causes and determine how to control them.

Definitions

• HS Representative – Health and Safety Representative

Section 3 – Subcontractor Safety Management

Purpose

The purpose of this program is to verify that subcontractors carry out work for the company being in compliance with all company rules, safe work practices, procedures and applicable legislation meeting all the safety standards of Maximum Mechanical Services' HSE-MS.

Definitions

Contract – A legally binding agreement entered into between Maximum Mechanical Services and the subcontractor which allows both parties specific rights and obligations within the confines of the agreement.

Subcontractor Pre-approval – Criteria used to evaluate a subcontractor's suitability, work practices, and HSE programs and processes.

Service Agreement – A form outlining all of the specific services and duties the subcontractor is required to perform under contractual requirements. Also, referred to as "Terms and Conditions".

Direct Service Provider – Can be referred to as a one person company without employee contracted for services and supervised by one of Maximum Mechanical Services' supervisors (i.e., HSE Advisors, Quality Advisor, etc.) Maximum Mechanical Services categorizes as DSP as employee, supervisor, manager, based on the requirements of their role in the administration and implementation of Maximum Mechanical Services HSE-MS.

Low Risk Subcontractor – A subcontractor that, through their actions or service, would create a low risk for HSE activities to the facilities (i.e., custodial staff, contract security, administrative contract services, etc).

Third Party Approval – A certified, recognized organization that reviews companies, HSE performance and systems that is equal to Maximum Mechanical Services' approval process and checklist. (i.e., CanQual, ISNetworld).

Subcontractor – A person, partnership or group of people retained by Maximum Mechanical Services under a contract to provide specific services under said agreement for a specific price. Services of the subcontractor are considered to be all functions, activities, and duties as outlined in the contract.

Work Scope – Outlines, and explains in detail, the description of the work or service and HSE measurements or controls.

Worksite – Refers to a location where an employee is engaged in performing their duties. This includes any vehicle or mobile equipment that is used by an employee engaged in work related activities.

Roles and Responsibilities

Senior Management

Senior management's responsibilities with the subcontractor safety management process include, but are not limited to the following:

- Ensure a process is in place for the adoption and implementation of the subcontractor safety management program.
- Ensure a process is in place to select subcontractors that will be compliant with all company rules, safe work practices, procedures and applicable legislation meeting all the safety standards of Maximum Mechanical Services' HSE-MS.¹
- Ensure a process is in place to consistently manage subcontractors to be accountable for work being performed.
- Protect the fair and consistent application of this program.

Middle Management

Middle management's responsibilities when hiring and managing a subcontractor include, but are not limited to the following:

- Evaluate potential subcontractors through the pre-qualification process to confirm that Maximum Mechanical Services HSE-MS standard are met at a minimum.
- Select only subcontractors which have been pre-qualified to work for Maximum Mechanical Services.
- Inform the subcontractor of any hazards or risks that could be present on the worksite.
- Review the subcontractor's pre-qualifications including, but not limited to, HSE training documents, HSE statistics and trending.
- Communicate the client's respective Alcohol and Drug Policy and any testing requirement to the subcontractor. Subcontractors must adhere to the requirements of the Drug and Alcohol policy at all times while at the worksite.
- Provide a copy of the site Emergency Response Plan to the subcontractor.
- Participate in any incident investigations involving subcontractors and ensure that the incident is reported to the client, if required.
- Report and participate in any incident investigations involving subcontractors and ensure that the appropriate corrective actions are identified and implemented and report findings to the client.

¹ Alberta Occupational Health and Safety Act, Part 1 - Section (9)

Supervision

Supervision's responsibilities within the Subcontractor Safety Management include, but are not limited to:

- Only allow pre-qualified subcontractors to perform work on Maximum Mechanical Services managed worksites.
- Participate in incident investigations as required including supplying Maximum Mechanical Services client's with a copy of the report, if necessary.

Subcontractor

Subcontractors, including Direct Service Providers are required to perform their work in a safe manner as to protect the health and safety of themselves, their employees, the employees of Maximum Mechanical Services, and all other individuals on the worksite.

Subcontractor's responsibilities include, but are not limited to:

- Abide by their own HSE-MS, provided it is more stringent than Maximum Mechanical Services HSE-MS. If the Maximum Mechanical Services HSE-MS is more stringent, the subcontractor is to comply with Maximum Mechanical Services HSE-MS and the applicable legislation. Companies that do not have their own health and safety program, will follow Maximum Mechanical Services HSE-MS.
- Read and sign the Service Agreement including providing Maximum Mechanical Services with the subcontractor pre-approval.
- Implement processes so employees adhere to all their HSE policies, codes of practice, safe job procedures, and safe work practices.
- Participate in Maximum Mechanical Services HSE-MS including General Safety Orientations, HSE Meetings and Toolbox Meetings, if directed so by Maximum Mechanical Services supervision.
- Supply a letter or certificate to Maximum Mechanical Services to illustrate Workers' Compensation coverage is current, in good standing and the account is not in arrears.
- Supply a certificate of Comprehensive General Liability Insurance to Maximum Mechanical Services with the required level of coverage.
- Supply a certificate of Automobile Public Liability and Property Damage to Maximum Mechanical Services with the required level of coverage.
- Report all incidents, injuries, motor vehicle incidents, and serious near misses that occurred in the course of conducting work outlined in the Service Agreement.

General Information

Maximum Mechanical Services is committed to hiring competent subcontractors and working together with those subcontractors to achieve our goal of an injury and incident free workplace.

The objectives of Maximum Mechanical Services' subcontractor safety program are to:

- Clearly establish the respective duties and responsibilities of Maximum Mechanical Services representative and subcontractors.
- Adequately select subcontractors suitable for the work so that improvements in their overall performance will reflect positively in regards to safety on Maximum Mechanical Services worksites.
- Ensure that consistent safety standards are being applied on all Maximum Mechanical Services worksites.
- Ensure regulatory and client obligations are being properly fulfilled.

Minimum Subcontractor Prerequisites

The following represents the minimum subcontractor prerequisite that must be in place prior to working for Maximum Mechanical Services:

Insurance – As required by project scope: Commercial General Liability Automobile Liability

WCB Coverage – WCB account in good standing for the provinces in which a company operates.

Safety Program – Safety Program that meets or exceeds the standards set by Maximum Mechanical Services HSE-MS.

COR/SECOR – Current certification or are able to demonstrate they are working towards achieving an acceptable industry related Certificate of Recognition.

Approved Subcontractor List

All subcontractors conducting work for the company must be on Maximum Mechanical Services' approved vendor list. Maximum Mechanical Services maintains this list as well as pre-qualification information through a pre-qualification process.

Subcontractor Pre-Approval Procedure

Procedure for evaluating and choosing a subcontractor:

1. Maximum Mechanical Services will obtain information and evaluate according to the

subcontractor's safety track record, HSE-MS, insurance, experience and previous HSE performance records. If previous HSE performance records are unavailable, refer to the injury and illness rates (WCB Rate Sheet). For a subcontractor to pre-qualify, the above safety metrics will meet acceptable standards as criteria for selection.

- 2. Maximum Mechanical Services will confirm that the subcontractor has or is in the process of obtaining a Certificate of Recognition (COR/SECOR).
- 3. Once a subcontractor has been selected, the subcontractor will complete a Pre-Job Hazard Assessment of the worksite to identify health and safety requirements and potential hazards associated with the scope of work.
- 4. Based on project parameters the subcontractor may be required to provide a safety management plan to outline work standards, procedures, and practices which are applicable to the work scope.
- 5. Maximum Mechanical Services and subcontractors will conduct a pre-job meeting to review the scope of work, HSE risks and action plans to control the risks. The Job Hazard Assessment and Safety Management Plan may be utilized to communicate the risks of the project.
- 6. During the contract work, Maximum Mechanical Services will monitor the performance of the subcontractor and its employees to ensure they are working according to applicable legislation and at a minimum meeting the standard set out in Maximum Mechanical Services HSE-MS.
- 7. Post job performance reviews will be conducted for subcontractors upon completion of the contract. Maximum Mechanical Services will conduct a meeting with the subcontractor to review HSE performance during the execution of the project.

Revocation of Subcontractor Approval

If during the on-going HSE performance monitoring Maximum Mechanical Services identifies subcontractor non-compliance with the HSE-MS, the subcontractor will be notified verbally and in writing that they are in non-compliance. The subcontractor will be informed that non-compliance is grounds for termination of the contract.

If no corrective action is taken after written notice of non-compliance is provided by Maximum Mechanical Services, or if imminent danger exists, a stop work order will be issued and all work performed by that subcontractor within Maximum Mechanical Services will cease.

The subcontractor and Maximum Mechanical Services will conduct a site meeting to address the issue. Meeting minutes must be taken and continued non-compliance will result in contract termination.

Section 4 – Hazard Assessment and Control Process

Purpose

The Hazard Assessment and Control Process is used to protect personnel from injury or occupational illness, and prevent incidents at the worksite by identifying and correcting unsafe acts and conditions.^{1,}

While the Hazard Assessment and Control Process is concerned with real-time visible incidents and conditions, it also looks at probability and the potential for hazards that may be encountered by determining and evaluating health, safety, and environmental hazards on the worksite, as well as the potential for equipment or production losses associated with specific tasks.

Maximum Mechanical Services will comply with current legislation in identifying, ranking, and controlling hazards throughout its business activity, both on and off worksite. The regulatory and legislative requirements are the minimum considered to be the minimum; Maximum Mechanical Services' worksite and locations will be reviewed for additional requirements relating to specific worksite hazards.²

Maximum Mechanical Services will ensure that employees affected by the hazards identified in a Hazard Assessment and Control Process are informed of the hazards and of the methods used to control or eliminate the hazards. Maximum Mechanical Services will ensure that any risk assessment completed for any task or new project will be documented and controls will be reviewed to ensure no new hazards are created.

Definitions

Hazard – A situation, condition or anything that may potentially cause harm to the safety or health of employees, or damage to equipment, materials, and the environment.

Hazard Assessment – A formal process to identify hazards that may cause loss or damage to people, equipment, materials, property or the environment.

Health Hazard – Any hazard that could result in occupational illness over a defined period of time.

Risk – A measurement of the potential loss that would result if the hazard remained uncontrolled during the work activity.

Risk Analysis – A systematic use of available information to determine numerical values using frequency and consequences to rate the level of control required to mitigate each risk.

Safety Hazard – Any hazard that could result in injury.

¹ Alberta Occupational Health and Safety Act, Part 1 - Obligations of Employers, Section 3

² Alberta Occupational Health and Safety Code, Part 2 - Hazard Assessment, Elimination and Control, Section 7 (1)

Job Hazard Assessment (JHA) – A technique that focuses on job tasks as a way to identify hazards before they occur. It focuses on the relationship between the worker, the task, the tools, and the work environment.

Field Level Hazard Assessment (FLHA) – Is used to control hazards as soon as they are identified in designated work areas. It empowers front line workers to minimize the health and safety risks at the onset through the "stop and think" process.

Field Level Risk Assessment (FLRA) – Is used to control hazards as soon as they are identified in designated work areas. It empowers front line workers to minimize the health and safety risks at the onset through the "stop and think" process.

Hazard Assessment and Control Process

Maximum Mechanical Services will ensure that the Hazard Assessment and Control Process is carried out:

- before work begins on a project. Existing hazards and potential hazards must be assessed and a report must be prepared detailing the results of the hazard assessment and methods used to control or eliminate the hazards.
- at reasonably practical intervals to prevent unsafe and unhealthy working conditions from developing.
- when a new work process or personnel are introduced.
- when a work process or operation changes.
- before the construction of significant additions or alterations to a worksite.
- if no new work process or significant operational changes occur, the formal hazard assessment will be reviewed, at minimum annually.

Roles and Responsibilities

Senior Management

Senior management's responsibilities within the Hazard Assessment and Control Process include, but are not limited to the following:

- Ensure a process is in place to identify workplace hazards and eliminate or control them to as low risk as reasonably practicable.
- Ensure an assessment is completed on all worksites to identify existing and potential hazards before work begins at the worksites or prior to the construction of a new worksite.
- Ensure a process is in place for the development of a job task inventory.
- Ensure a process is in place for the development of a JHA per site requirements.
- Ensure a process is in place for assessing hazards at reasonably practicable intervals.

Middle Management

Middle management's responsibilities within the Hazard Assessment and Control Process include, but are not limited to the following:

- Ensure employees who are affected by the hazards identified in a hazard assessment report are informed of the hazards and of the methods used to control or eliminate the hazards.
- Direct the completion and review of a JHA for each job task through consultation with supervisors and employees.
- Will evaluate tasks with medium and high risk of causing injury or business loss/equipment damage through the use of the JHA process.
- Develop codes of practice, safe work practices, and safe job procedures for all required tasks, in conjunction with supervision and employees.
- Ensure all employees are trained on hazard identification and risk assessment.
- Ensure an assessment is completed on all worksites to identify existing and potential hazards before work begins at the worksites or prior to the construction of a new worksite.
- Lead the hazard assessment process in conjunction with supervisors.
- Develop a job task inventory.
- Sign-off on all completed JHAs.

Supervision

Supervision's responsibilities within the Hazard Assessment and Control Process include, but are not limited to the following:

- Lead the hazard assessment process in conjunction with management, as required.
- Evaluate tasks with medium risk determined through the use of the JHA process.
- Assist with the completion and review of a JHA for each job task identified through consultation with management and employees, as required.
- Attend/lead the FLHA process with affected employees.
- Sign off on completed FLHAs prior to the execution of the work or as soon as reasonably practicable.
- When completing a FLHA, if the hazard cannot be controlled to an appropriate level of risk, notify
 management and do not proceed until the situation has been reassessed and an effective control
 can be put in place.
- Develop codes of practice, safe work practices, and safe job procedures for all required tasks, in conjunction with management and employees.

JHSC Members/HS Representative

JHSC Member's/HS Representative's responsibilities within the Hazard Assessment and Control Process include, but are not limited to the following:³

- Participate in the hazard assessment process in conjunction with management, as required.
- Assist with the completion and review of a JHA for each critical task identified through consultation with management and employees, as required.
- Participate in developing codes of practice, safe work practices, and safe job procedures for all required tasks, in conjunction with management and employees.
- Lead the hazard assessment process in conjunction with supervision.

Employee

Employee's responsibilities within the Hazard Assessment and Control Process include, but are not limited to the following:

- Employees must be actively involved in the hazard identification process and assist with the completion and review of a JHA for each critical task identified through consultation with management and supervisors, as required.
- Complete and sign off on a FLHAs to identify existing or potential hazards before any work begins and reassess the FLHA periodically throughout the day, updating as required.
- When completing a FLHA, if the hazard cannot be controlled to an appropriate level of risk, notify immediate supervisor, and do not proceed until the situation has been reassessed and an effective control is put in place.
- Participate in developing codes of practice, safe work practices and safe job procedures, in conjunction with management and supervision, as required.

Supplier

Supplier's responsibilities within the Hazard Assessment and Control Process include, but are not limited to the following:

• Supply a copy of the Safety Data Sheet (SDS) prior to a product being introduced on the worksite.

³ Alberta Occupational Health and Safety Act, Part 3 - Joint Work Site Health and Safety Committees, Section 19

Risk Assessment Matrix

The Risk Assessment Matrix is a tool used to rank hazards in the worksite. It is a combination of the severity and probability of a given hazard and numerically defines the outcome.

Severity – How serious an injury or loss might be.

Probability – The likelihood that the identified hazard will result in an incident within a three (3) year period.

Consequence - The result of an incident occurring in relation to people, equipment and environment.

RISK ASSESSMENT MATRIX								
	High Risk	Unacceptable, Will Reduce Risk, Action Required						
	Medium Risk	Undesirable, Take Risk Reduction Measures, Action Required						
	Low Risk	Acceptable, Reduce as Practical, No Further Action Required						
SEVERITY	PROBABILITY							
	5) Frequent	4) Probable	3) Occasional	2) Remote	1) Improbable			
5) Catastrophic	25	20	15	10	5			
4) Critical	20	16	12	8	4			
3) Moderate	15	12	9	6	3			
2) Minor	10	8	6	4	2			
1) Marginal	5	4	3	2	1			

DECISION MAKING FLOWCHART

Where the final risk falls in one of these categories, this Decision Making Flow Chart WILL be met prior to work start to an accessible risk.



Managed at Field Level

Potential Consequences (For any incident or potential incident check all effects)					Probability	
Severity	People	Property Damage (Loss)	Environmental Impact	Public Image & Reputation	Descriptive Word	Definitions
Catastrophic	Lost Time Injury or Fatality	> 250,000	Reportable Occurrence	Owner Standard not Met	Frequent	Likely to occur repeatedly in three years
Critical	Permanent Impairment and/or long term injury or illnesses	> 100,000	Owner Standard not Met	Owner Intervention and Local Media Intervention	Probable	Likely to occur several times in three years
Moderate	Serious Injury (Restrict Work Medical Aid)	< 25,000	Owner Standard not Met	Community or Local Attention	Occasional	Likely to occur sometimes in three years
Minor	First Aid or Near Miss	< 10,000	Owner Standard not Met	Individual or None	Remote	Not likely to occur in three years but possible
Marginal	Unsafe Act/ Condition	5,000	No Impact	None	Improbable	Probability of Occurrence cannot be distinguished from zero

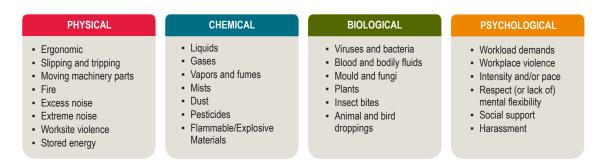
Effective Date: Revision Date: Revision No.:

MMS-HSE-MS-V.5 - September 7, 2022

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Employees will be trained on identification, control and risk assessment of workplace hazards using the Risk Assessment Matrix and the employees performing the assessments will be provided training on how to conduct them using Hazard Assessment and Control Process as a guideline. Training can be performed inhouse or by a third-party.

In considering the task/project, Risk Analysis typically addresses the following health and safety hazards:



Pre-Project Hazard Assessment

Information from the Pre-Project Hazard Assessment should be referenced in the development of a Safety Management Plan for the job or project.

Pre-Project Hazard Assessments are to be communicated to employees as an administrative control method; so, employees are aware of the hazards and methods to control the risk of injury or loss on the job or project. Copies of the assessments are to be kept at the worksite for update and review.

Job Task Inventory

A Job Task Inventory is a system developed to define all the tasks performed by each job (position) in the company. As there are a significant number of tasks for each job, this is best accomplished by the use of the Job Task Inventory worksheet. This worksheet can be utilized as a tool to assess the training needed for each position within the company.

All the tasks identified must be risk ranked utilizing the Maximum Mechanical Services Risk Assessment Matrix, to identify the critical (most hazardous) tasks.

An example of a Job Task Inventory is as follows:

Job Task Inventory									
Task	Employee	Supervisor	Manager	Risk Ranking					
Driving	Х	Х	Х	1					
Driving in Adverse Condition	, JIE	Х	Х	1					
Manual Lifting	AWALL	Х		1					
Administration-Office Duties	1	Х	Х	1					
House Keeping	Х	Х		1					

The Job Task Inventory defines all the tasks conducted within an organization. The Job Task Inventory Worksheet is a system which will include a list of the tasks and will identify which positions within the organization complete these tasks, as well as the potential risk. This regulates and prioritizes which hazardous tasks will be of immediate concern and will need to be controlled first.

Once a Job Task Inventory has been developed by management, a JHA must be completed for each task.

Job Hazard Assessment (JHA)

A JHA is to be completed on each critical task through a coordinated effort from management, supervision and employees so that expertise from all areas of the company. It is important the team selected to complete the JHA includes employees and supervisors who understand the hazards of the task.

The team is to follow the formal Hazard Assessment and Control Process and document the information on the standardized JHA form to illustrate their contribution to the process. This involves identifying both existing and potential hazards and then, assessing the necessary controls that are required to be put in place to minimize the risk of injury or loss to a reasonably practicable level.

All personnel involved in the development of JHAs are to sign on to the JHA form to illustrate their contribution to the process. Management will provide approval and sign off on the completed JHAs.

JHAs are to be communicated to employees as an administrative control method to ensure they are aware of the hazards of the task and methods to control the risk of injury or loss. JHAs should be kept in a location central to the work being performed and readily available to the workforce.

Code of Practice (COP)

A code of practice is intended to provide practical guidance, present safe work procedures and address issues specific to the hazard to which the code applies. Provincial occupational health and safety legislation requires that procedures be in writing and available to employees.⁴,

As required by legislation and employer, the employer must ensure that:

- a copy of the code of practice is readily available to employees and other persons at the worksite.
- all employees to whom the code of practice applies receive appropriate education, instruction or training regarding the content of the code of practice. Doing so helps employees comply with it.

Safe Work Practice (SWP)

Safe Work Practices (SWP) are written methods outlining how to perform a task with consideration to managing the risks of injury or damage to people, property, equipment, materials, environment and/or processes. SWPs should be developed using information from the JHA to ensure the SWP includes the necessary controls. SWPs are generally written for all jobs which are classified as a Medium or High Risk. Refer to Maximum Mechanical Services's Risk Assessment Matrix for more information on risk ranking.

All SWPs should be kept in a location central to the work being performed and readily available to the workforce.

Safe Job Procedure (SJP)

Safe Job Procedures (SJP) are a series of specific steps that guide an employee through a task from start to finish in a chronological order. SJPs are designed to reduce the risk by minimizing potential exposure.

All SJPs should be kept in a location central to the work being performed and readily available to the workforce.

More information on Codes of Practice, SWPs and SJPs is provided in sections at the end of this manual.

Safe Work Permit

A safe work permit is a written record that authorizes specific work, at a specific work location, for a specific time period. Permits are used for controlling and coordinating work to establish and maintain safe working conditions. They ensure that all foreseeable hazards have been considered and that the appropriate precautions are defined and carried out in the correct sequence.

The permit is an agreement between the permit issuer and the permit receiver that documents the conditions, preparations, precautions, and limitations that need to be clearly understood before work begins.

⁴ Alberta Occupational Health and Safety Act, Section 62 (1) - Code of Practice

The permit records the steps to be taken to prepare the equipment, building, or area for the work, and the safety precautions, safety equipment, or specific procedures that must be followed to enable the employee(s) to safely complete the work.

Toolbox/Tailgate Meeting

Toolbox/Tailgate Meetings are an opportunity to review the hazards and controls on the jobsite through a discussion of the following:

- Safe Work Practices (SWP)
- Safe Job Procedures (SJP)
- Codes of Practice
- Permits Issued
- Operations Procedures
- Job Hazard Assessment

- WHMIS Documents
- Emergency Response Procedure
- Applicable Legislation
- Incident History
- Known Job Hazards

Field Level Hazard Assessment (FLHA)

The FLHA is part of the Hazard Assessment and Control System which assists employees in identifying and controlling task specific hazards. Prior to work commencing, all employees must be involved in the FLHA process by doing a visual identification of hazards directly at the worksite. The employees will then establish controls for all hazards referring to JHAs which have already been completed for the specific tasks, Safe Work Practices, Safe Job Procedures, Codes of Practice, and other documents such as SDS, manufacturer's specifications, etc. If the hazard cannot be controlled to a reasonable level of risk, management must be informed and work must not proceed until the situation has been reassessed and an effective control can be put in place.

Each employee present is expected to sign on to the FLHA form after the review has taken place. The FLHAs are used for all daily activities and should be revisited and updated if any of the following situations were to occur:

- A job scope changes or has additions to the originally assigned tasks
- Special/new equipment is being brought in during the course of work
- · Entrance into a restricted/confined workspace is required
- New employees are introduced to the task
- Changes to weather conditions occur

Supervisors are to attend/lead the process with employees on the development of the FLHA and sign-off on the completed FLHA form prior to the execution of the work or as soon as reasonably practicable.

Methods for Controlling Hazards

Maximum Mechanical Services is committed and obligated to control or eliminate a hazard that poses a danger to the health and/or safety of employees. Only competent, trained personnel are allowed to correct a hazardous condition after conducting a complete and accurate Hazard Assessment. Control of worksite hazards follows the hierarchy of controls as defined in legislation as Engineering Controls, Administrative Control, and Personal Protective Equipment Controls.

- Elimination removal of a hazardous job, tool, process, machine or substance. Examples include:
 - Providing hoisting or material handling equipment rather than have employees manually lift, lower, carry, materials, etc.
 - Eliminating the need for employees to work above grade, by lowing equipment that has to be accessed, such as valve controllers, gauges, sample points, etc.
 - Providing proper working platforms instead of relying on personnel to access equipment or areas with ladders.
 - Providing a chemical injection system that eliminates the need for employees to handle a hazardous chemical.
- **Substitution** if elimination is not practical, try substituting or replacing one substance or process with another. Examples include:
 - Substituting a hazardous substance for a safer one.
 - Replacing hazardous operations with less hazardous operations.
 - Selecting tools, equipment, and machinery that require less maintenance.
 - Replacing heavy, awkwardly shaped loads with lighter loads that have handles and/or good gripping surfaces.
 - Storing hazardous materials in smaller quantities and containers.

Engineering Controls

Engineering controls provide the highest degree of control because they eliminate or control the hazard at its source as close as possible to where the hazardous situation exists. Engineering controls are the preferred method of eliminating or controlling hazards. Engineering controls include the following:

- Redesign hazards can sometimes be "engineered out" through redesign of the worksite, workstations, work processes and jobs. Examples include:
 - Providing fail-safe interlocks on equipment, doors, valves, etc.
 - Installing guardrails on elevations.
 - Providing non-slip working surfaces.
 - Controlling traffic to avoid collisions.
 - Providing fixed detection systems.

- Reducing the road grade.
- Improving workplace lighting, ventilation, and temperature control.
- Using regulators, governors, and limit controls.
- Isolation hazards can sometimes be isolated through containment or enclosure. Examples include:
 - Negative-pressure fume hoods in laboratory settings.
 - Sound reducing enclosures for noisy equipment.
- **Barriers** some hazards can be blocked. The further a barrier keeps a hazard away from employees, the more effective the barrier. Examples include:
 - Guards on machines.
 - Enclosures and covers.
 - Welding screens to prevent welding flash from reaching employees.
 - Debris and personnel safety nets.
 - Machinery lockout systems that protect maintenance employees from exposure to electricity, heat, pressure, radiation, etc.
 - Separating vehicle and pedestrian traffic.
- Absorption some hazard can be absorbed or removed. Examples include:
 - Baffles that block or absorb noise.
 - Local exhaust ventilation that removes toxic gases, dusts, or fumes where they are produced.
- **Dilution** some hazards can be diluted or dissipated. Examples include:
 - General ventilation that dilutes the concentration of a hazardous gas with clean air from the outside. While suitable for less toxic substances, it is not effective for substances that are harmful at low concentrations.

Administrative Controls

When engineering controls are not possible or practical, administrative controls are the next approach to controlling hazards. Administrative controls are less effective than engineering controls since they do not eliminate the hazard. Examples include:

- Codes of Practice
- Safe Work Practices
- Safe Job Procedures
- Hazard Assessment and Controls
- Work Permits
- Scheduling to reduce exposure to a hazard

- Transferring an operation to a contract service that has extensive experience in dealing with the hazard
- Inspections
- Additional Training

Personal Protective Equipment (PPE) Controls

PPE should only be used as a last line of defence to reduce the potentially harmful effects of exposure to a hazard. PPE is much less effective than engineering controls since it does not eliminate the hazard. PPE must be used properly and consistently to be effective. Awkward or bulky PPE may prevent an employee from working safely. In some cases, PPE can increase the likelihood of hazards such as heat stress and tripping and falling.

Emergency Control of Hazards

On a worksite where a Hazard Assessment and Control indicates that emergency action is required to control or eliminate a hazard, Maximum Mechanical Services will only allow personnel who are competent and trained in correcting the condition to do so. Maximum Mechanical Services will make every reasonable effort to control the hazard while the condition is being corrected.⁵

Hazard Assessment and Control Procedure

STEP 1 – Determine the Job to be Assessed

It is essential to ensure that the most hazardous jobs are examined first. The following factors should be considered when determining the most hazardous jobs:

- Incident frequency and severity history of the job (safety statistics)
- Potential for fatality or severe injuries (safety statistics)
- Newly developed jobs (manufacturing new products)
- Jobs that have been modified (new equipment)
- Jobs that are performed frequently (complacency)
- Jobs that are performed infrequently (lack of knowledge)

STEP 2 – Determine the Required Task(s)

Once the job to be assessed is determined, the various job-specific tasks for that job are to be established and listed.

⁵ Alberta Occupational Health and Safety Code, Part 2 - Hazard Assessment, Elimination and Control, Section 10(1) - Emergency Control of Hazard

STEP 3 – Break the Task(s) Down into Basic Steps

The next step required is to break each task into smaller, more manageable steps. Keep the steps in the correct, numerical order and number them sequentially (1,2,3, etc.). Any step that is out of sequence has the potential to cause a hazard to be missed or overlooked. Start each step with an action verb (i.e., watch, turn switch, lift, change, alternate, place, etc.) followed by the action to be completed.

Observing an experienced employee completing each step can provide an invaluable learning tool. Both supervisors and employees need to be involved in this process, guaranteeing that all the basic steps have been completed accurately and in the correct sequence. The observation should be completed under normal working conditions and the employee completing the job is to be assured that the job is the focus, not their competency. Employee input and comments can provide an insight into problems not easily detected. Suggestions and comments should be noted.

STEP 4 – Identify Potential Hazards

When all steps have been recorded, potential hazards for each step must be identified. Using all of the assembled information, visualize and discuss each step and its possible consequences. Every potential hazard identified should be matched with each corresponding step. A preliminary method used to start hazard assessments is to identify all sources of energy the employee may come in contact with or be exposed to. Energy sources can include, but are not limited to, the following:

- Electrical
- Chemical
- Mechanical
- Biological
- Compressed gases or liquids
- Overhead work or work near water
- Working at elevated heights
- · Powered equipment and tools
- Environmental factors
- Adverse weather or extreme conditions
- A variety of other energy sources applicable to the worksite or task

Step 5 – Initial Risk Ranking of Each Hazard

Once all of the potential hazards have been identified, they must be ranked using a standard ranking system from highest risk to lowest risk. Utilize Maximum Mechanical Services' Risk Assessment Matrix to rank risks.

Step 6 – Types of Hazards

The type of hazard assessed shall be categorized as a Safety Hazard or a Health Hazard and recorded on the JHA form. Examples may include, but are not limited to:

- **Safety Hazard** Exposure to rotating machines, working under a suspended load, icy conditions due to inclement weather.
- Health Hazard Excessive noise levels, paint fume inhalation, burns/scalds, skin contact with solvents.

STEP 7 – Evaluate Identified Hazards and Identify Control Measures Needed

This step assesses the potential hazards of each step of the task, and any hazard controls that are required to eliminate, control, or minimize the hazards that have been identified to an acceptable level. The hazards identified should be controlled following the hierarchy of controls defined in legislation as Engineering Controls, Administrative Controls, and PPE Controls (See Methods for Controlling Hazards). Each hazard identified in each step must have a corresponding control put in place to eliminate or control it and must be documented on the JHA form.

STEP 8 – Assign a Final Risk Ranking

After control measures have been implemented, review the initial risk ranking (step 5) of each hazard. Reassess and assign a final risk ranking for each step now that preventative measures have been put in place. The probability, severity and corresponding risk rank must all be documented on the JHA form.

STEP 9 – Implement and Monitor the Hazard Control Measures

If the risk is considered low and remains within an acceptable margin of minimal risk, continue with the task. If the level of risk remains in an elevated position, it is unacceptable. Additional risk assessment and analysis must be completed before further hazard control measures are attempted and implemented. This process of hazard assessment and control remains until the hazard is eliminated or reduced to an acceptable level.

Hazard ID/Near Miss Reporting

As workers throughout the day encounter hazards at the worksite, the following steps must take place:

- Recognized hazards (Chemical, Biological, Physical, Psychological types):
 - Identify by marking or taping off area containing the hazard.
 - Removed/correct hazard if able to do so safely. (Elimination/Substitution)
 - Notify supervisor/foreman on site.
- Record hazard on the Hazard ID/Near Miss form and/or update FLHA

• Once controls have been implemented, the supervisor is responsible to investigate and determine if the controls are adequate to protect the workers.

Record Retention

FLHAs are to be recorded and kept for three (3) years.

Section 5 – Emergency Preparedness

Purpose

The purpose of the Emergency Preparedness Program is to provide guidance to management, supervisors and employees for the development, implementation and review of an Emergency Response Plan (ERP) to be followed in the event of an emergency that may occur at any work location.^{1, 2}

Definitions

Competent – Employee is adequately qualified, suitably trained, and either has sufficient experience to work safely without supervision or with only minimal supervision.

- Adequately Qualified The employee has qualifications, usually earned through a formal education program, training course, etc., or a combination of education and practical experience.
- **Suitably Trained** The employee has training that is appropriate to the tasks performed, equipment used, etc.
- **Sufficient Experience** The employee will safely perform work without supervision or with a minimal degree of supervision. Determining whether an employee has sufficient knowledge and experience to safely perform work is the employer's responsibility.

Designated First Aider – A person who holds a valid standard first aid certificate through a recognized agency (i.e., Red Cross, St. John's Ambulance, etc.).

Emergency Response Plan (ERP) – Comprehensive document to provide guidance on actions to be taken under various possible emergency conditions including responsibilities of all employees, available organizational resources, sources of aid outside the organization, general methods or procedures to follow, authority to make decisions, requirements for implementing procedures within the company, training and practice of emergency procedures, communications and reports required.

Emergency Planning – Process to develop detailed procedures for responding to emergency situations such as fires, explosions, chemical spills or uncontrolled releases.

Emergency Procedure – Action to be taken in case of identified emergency.

Emergency Rescue – Procedure for moving a victim from a dangerous location to a safe place

¹ Alberta Occupational Health and Safety Act, Part 1 - Obligations of Employers, Section (3)

² Alberta Occupational Health and Safety Code, Part 7 - Emergency Preparedness and Response

First Aid Incident – A work related incident that typically does not require attention from a health care professional. First aid incidents include those where an individual visits a health care professional solely for:

- observation,
- non-prescription medication,
- wound covering,
- removal of foreign bodies from a wound (uncomplicated),
- removal of foreign bodies from an eye via irrigation or cotton swabs,
- treatment of 1st degree burn, hot or cold therapy,
- diagnostic test (i.e. x-ray, blood test),
- issuance of a non-rigid means of support,
- use of temporary immobilization devices (i.e. sling),
- use of eye patches,
- use of finger guards,
- tetanus immunization,
- · cleaning of a wound on skin surface,
- drilling a nail to relieve pressure,
- drinking of fluids to relieve heat stress, and
- massage (except when prescribed by a health care professional).

Lost Time Incident (LTI) – A lost time incident is a work-related injury that causes the injured person to miss work and the injured person is temporarily unable to perform any regular job or restricted work activity. A lost time incident does not include regular scheduled days off (i.e., normal days off, holidays) or the day on which the injury occurred. In cases where employment has been terminated, this would include any workdays lost that had been previously scheduled, or an estimate of workdays that would be lost after termination.

Medical Treatment Incident – A work related incident which involves medical treatment from a health care professional followed by immediate return to work without restrictions.

Medical treatment includes:

- issuance of prescription medication,
- wound closing/suturing,
- removal of foreign bodies from a wound (complicated),
- removal of foreign bodies from an eye (except irrigation and cotton swab),
- treatment of infection,
- treatment of a bruise via blood drainage,
- treatment of 2nd/3rd degree burn, and

• issuance of a rigid means of support, amputation/permanent loss of usage, vaccine (except tetanus), and cutting away dead skin.

Medical treatment incidents do not include:

- visits to a physician or other licensed health care professional solely for observation or counselling.
- "First Aid" as defined in this section.

Roles and Responsibilities

Senior Management

Senior management's responsibilities within Emergency Preparedness include, but are not limited to the following:³

- Provide resources for the development, implementation and review of the ERP.
- Ensure an effective process is in place to communicate and test the ERP at least annually.
- Ensure a process is in place to respond effectively to head office emergencies.
- Ensure a documented plan is in place and communicated to all employees which identifies all potential emergencies. This will include the first aid requirements under the applicable Occupational Health and Safety (OH&S) legislation and regulatory compliance.
- Ensure all PPE and any other necessary equipment for emergency response both on and off site is provided.
- Know evacuation alarms and procedures and the location of exits and fire extinguishers.
- Ensure a process is in place so all personnel are provided training in the emergency response procedures.

Middle Management

Middle management's responsibilities within Emergency Preparedness include, but are not limited to the following:

- Develop an ERP based on risk assessment prior to the execution of work at any work location which includes identifying all potential emergency situations that may arise.
- Coordinate emergency response drills at the required frequency.
- Revise the ERP as required based on recommended improvements identified through deficiencies found during emergency drills or through on-going reviews of the ERP.
- Assist supervisors in the implementation of the ERP as required.
- Identify resources and provide support to the office emergency response team members.

³ Alberta Occupational Health and Safety Act , Part 7 – Emergency Preparedness and Response

- Ensure that corrective actions noted on inspections are addressed.
- Plan, conduct and debrief periodic emergency response drills and exercises.
- Ensure office inspections are conducted on a regular basis.
- Know the types of evacuation alarms and procedures to follow. Be familiar with the location of emergency exits and fire extinguishers.
- Review the office safety inspections as part of the Office Emergency Response Team.
- Ensure a documented plan is in place and communicated to all employees which identifies all potential emergencies. This will include the first aid requirements under the applicable Alberta Occupational Health and Safety Code as per Schedule 2 First Aid.⁴
- Collect comments, complaints and suggestions, and build actions to address issues and concerns.
- Ensure all personnel are provided training in the emergency response procedures.
- Have knowledge of whom and location of any employees that are mobility impaired.

Supervision

Supervision's responsibilities within Emergency Preparedness include, but are not limited to the following:

- Communicate and train all employees on their responsibilities within the ERP.
- Review the applicable ERP regularly to ensure the information is current and accurate.
- Assess first aid requirements to ensure the ERP meets the minimum requirement under the applicable *Alberta Occupational Health and Safety Code*-Schedule 2.^{5,}
- Test the ERP through documented drills, table talks, etc. at the frequency identified during the Pre-Job Risk Assessment.
- Follow-up on corrective action(s) identified during emergency response drills and through on-going reviews of the ERP.
- Coordinate the execution of the emergency response plan in the event of an emergency.
- Know the types of evacuation alarms and procedures to follow for each. Be familiar with the location of emergency exits and fire extinguishers.
- · Have knowledge of location of employees that are known to have impaired mobility.
- Schedule, facilitate, and document emergency response team safety meetings.
- Sweep the area, if necessary, for any unaccounted personnel as identified in the head count.
- Ensure the site ERP and sign in sheets are brought along to the muster point.

⁴ Alberta Occupational Health and Safety Code, Schedule 2 - First Aid Requirements

⁵ Alberta Occupational Health and Safety Code, Schedule 2

Employee

Employee's responsibilities within Emergency Preparedness include, but are not limited to the following:

- Assist in the development of the ERP as required.
- Not starting work until familiar with their responsibilities in the event of an emergency.
- Adhere to all requirements of the ERP.
- Participate in emergency response drills as required and provide feedback for improvement.
- Know the types of evacuation alarms and procedures to follow for each. Be familiar with the location of emergency exits and fire extinguishers.

Visitors

Follow the instructions from your company contact and proceed to the muster point. Do NOT leave the muster point until a head count has been conducted and you have been instructed to do so.

Training

The success of the ERP depends on the competency level of supervision and employees to execute the plan. Supervision will designate responsibilities to employees and will ensure prior training on employee's roles in case of an emergency is appropriate for the worksite and any hazards likely to be encountered. As an example, employees may be designated responsibilities such as conducting a headcount.⁶,

Emergency response training will:

- include simulated exercises appropriate to the types of emergencies likely to occur at the worksite.
 Be repeated at regular intervals to maintain competency of the designated personnel in carrying out their duties in the event of an emergency.
- capture results of training exercises which will be retained and made available.
- include documentation of training and competency assessment records on emergency response.

Emergency Response Plan Assessment

While creating an ERP, it is important to assess the probability of an incident occurring and the consequence of the incident for which an emergency response may be necessary. Some of the different factors to consider in this assessment are, among other things, the number of people likely to be exposed, the extent of losses arising out of potential emergencies.

The assessment should be revisited whenever there are changes to operations, equipment, and/or personnel. Supervisors need to review the adjusted ERP with the employees. This assessment needs to determine whether additional training requirements are needed as a result of the adjustments to the ERP.

⁶ Alberta Occupational Health and Safety Code, Part 7 - Emergency Preparedness and Response, Section 117

Post Emergency Review

After each emergency response, a documented meeting will be held as soon as possible to review the performance and quality of the response. As a means to improve emergency response, all actions must be developed with an assignment of responsibility to complete the action item and an assigned due date. The supervisor of the worksite or management will lead this discussion. All post emergency reviews must be documented and action items will be monitored through to completion.

Components of an Emergency Response Plan (ERP)

A properly developed ERP will:^{7,}

- enable management to effectively prepare for potential emergency situations.
- allow employees to respond to emergencies and maintain personal safety.
- maintain continual improvement through emergency drills and tests.

The ERP will identify potential events that may require emergency response and the procedures to follow to mitigate the impact of the event.

The following items need to be considered when a plan is developed:

- Identify possible emergency situations and related emergency response procedures.
- Communication of and training in the ERP.
- Client procedures for emergency response, as required
- Site or facility diagrams.
- Location and operational procedures of emergency equipment.
 - Emergency equipment availability at off-site locations should be identified during the Pre-Job Safety Meeting or Toolbox/Tailgate Meeting.
- Location and use of emergency facilities.
- Fire protection requirements.
- Rescue and evacuation procedures including:
 - Head count and verification procedures;
 - Muster points;
 - Primary and secondary escape routes;
 - Access routes and doors for emergency access.
- Shutdown procedures.
- Alarm and emergency communication requirements.

⁷ Alberta Occupational Health and Safety Code, Part 7 - Emergency Preparedness and Response, Section 116 - Contents of a Plan

- Identification of first aiders and first aid requirements.
- Designated employees to assist in rescue and evacuation.
- Emergency contacts and phone numbers.

Emergency Response Drills/Exercises

Maximum Mechanical Services must conduct a minimum of one emergency response drill (table talk discussion, etc. annually. These drills must be documented on the company Emergency Response Drill Checklist and include the following:

- Date and time
- Location
- Type of drill (fire, injury, tornado, etc.)
- Details of the drill
- Deficiencies identified
- Improvements/recommendations (corrective actions)
- Attendees (names and initial)
- Manager review (name, signature and date)

Types of Emergency Response Drills/Exercises

Emergency response drills/exercises shall be conducted as per policy to ensure the response plan is workable and appropriate. Drills shall be evaluated to improve the emergency response plan and any of its components.

Telephone

Telephone drills may be performed to test the communication system. It may involve only the response team or the staff within the organization.

Table Top Drills

The table top drills use written and verbal scenarios to evaluate the effectiveness of the response plan. Designated personnel would talk through an emergency to ensure the plan is appropriate and team members are familiar with their roles and responsibilities. An example would be for a suspicious package or fire evacuation.

Full Scale Drills

Full scale drills involve all employees responding to real-life scenarios. Full scale responses often combine multiple scenarios to test the plan, take place in 'real time', and assess the efficiency and quality of the emergency response.

Emergency Evacuation

All worksites must have established safe meeting or muster points prior to the commencement of a workday. The chosen muster points are based on the assessment conducted as a requirement in the ERP. In the event of an evacuation, take the following actions:

- Sound the alarm (site alarm system, or air horn with three (3) short blasts).
- Safely cease job task in a quick and efficient manner.
- Shut down all sources of ignition (such as smoking, welding and vehicles) if safe to do so.
- If in a vehicle or mobile equipment, pull it over and park so access to hydrants or emergency equipment is not blocked (shut ignition off and leave keys).
- Keep phone and radio channels clear to facilitate emergency communications.
- Check for wind direction and any visible hazards (i.e., smoke, fire).
- Move in a crosswind direction out of the area and away from any visible hazard, proceed towards designated safe meeting or muster points to await further instructions.
- Head count to be conducted.
- If any individual is unaccounted for, supervision must note the following information and report to rescue and evacuation personnel to initiate search, when safe to do so:
 - Employee's name
 - Subcontractor's employer (if on site)
 - Last known work location
 - If they were alone or with others
 - Last known job task they were performing
- If a search is required, supervision will do the following:
 - Coordinate with the owner or prime contractor of the site and external response team (if applicable).
 - Confirm designation of trained personnel authorized to enter and search evacuated areas.
- In the event that a rescue is required, the first responder will meet the following standards:
 - Wear proper personal protective clothing and equipment appropriate to the hazards likely to be encountered.
 - Maintain clear communications between all personnel engaged in rescue or evacuation activities.

Emergency Response Procedures Based on Type

Maximum Mechanical Services' main operating location will have an ERP in place based on an annual Hazard Assessment that addresses:

MAXIMUM MECHANICAL SERVICES

- Injury/Illness
- Fire
- Bomb threats/suspicious Packages
- Motor vehicle collisions
- Weather emergencies/natural disasters
- Structure/equipment failure
- Hazardous substance release or spill
- Unwelcome visitor
- Gas line rupture
- Septic contamination
- Employees unaccounted
- Power outage
- Biological hazards: pandemic

Supervisors responding to an emergency will assume control of the evacuation or response until police, fire department or emergency personnel arrive and take over that responsibility.

Calling 911 Protocol

Call 911 to dispatch emergency services, and be prepared to answer questions as follows:

- Caller to identify themselves
- Type of emergency
- How many injuries
- Where emergency is located
- Nature of emergency
- Tell 911 we will have someone at the road to meet the emergency vehicles
- Remain on line for further instructions

Injury/Illness - First Aid/Medical Aid

All injuries and illnesses will be reported immediately to supervision after they occur and necessary medical attention will be obtained quickly. First aid can include treatment of minor scratches, cuts, burns and splinters, which are to be treated on the worksite by a designated, competent first aider. If the injury is severe and requires emergency medical assessment, the ERP is triggered. The process is as follows:

- 1. The responding personnel, or the first person on scene, will ensure to take precautions to protect themselves from any danger, and then proceed to secure the area, assessing the potential dangers (i.e., live, intact or downed power lines, chemicals, danger of falling objects, etc.).
- 2. Contact first aiders or medics on location.
- 3. Contact 911 (ambulance or other emergency services as required).
- 4. Reference Emergency Response Contact List. (at the end of this section)
- 5. If no external physical danger exists, the designated competent first aider will administer first aid with attention to the following:
 - Airway
 - Breathing
 - Circulation
- 6. Transportation is provided to nearest medical facility.
- 7. Supervision to notify senior management of incident/injury. If applicable, alert client of situation and any actions taken.
- 8. Obtain confirmation that medical assistance has been contacted.
- 9. If spinal injury is suspected, stabilize the injured person but do not move them unless in a lifethreatening situation.
- 10. Keep injured person warm and comfortable as possible, until medical assistance arrives.
- 11. When medical personnel arrive, brief them on the facts of the situation and possible medical history (if known).
- 12. If a fatality has occurred, secure the scene. Do not allow any evidence to be disturbed until authorities arrive.
- 13. Do not make any statement or express opinions to the media.
- 14. Write down the date, time, location and history of the incident including the First Aid administered.

MAXIMUM MECHANICAL SERVICES

Maximum Mechanical Services will record every acute illness or injury that occurs at the worksite in a record kept for the purpose as soon as is practicable after the illness or injury is reported.

A record must include the following:

- Name of the employee
- Name and qualifications of the person giving first aid
- Description of the illness or injury
- First aid given to the employee
- Date and time of the illness or injury
- Date and time the illness or injury was reported
- Where at the worksite the incident occurred
- · Work-related cause of the incident, if any

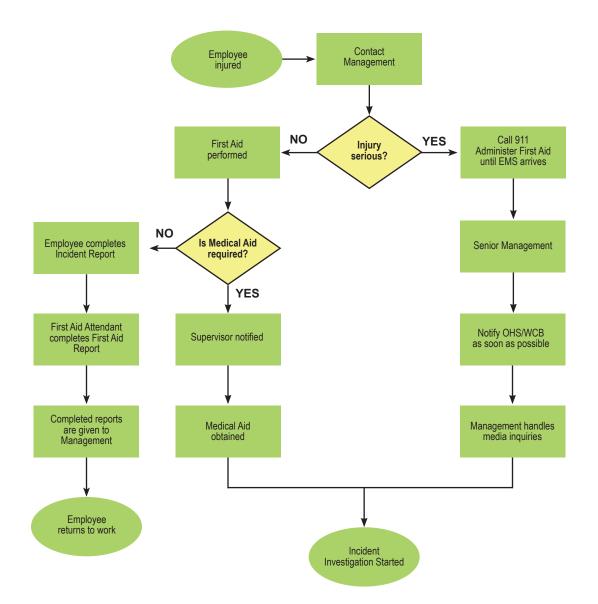
Maximum Mechanical Services will retain the records for three (3) years from the date the incident is recorded.

Transportation of Injured Employee

Plans will be in place at all worksites for emergency transport of injured employees to a site where they will receive appropriate medical attention. Prior to arriving at the worksite, Maximum Mechanical Services will prepare for potential transportation of any injured employees from the worksite to the nearest medical care facility. If transportation by ambulance is required but unavailable, or travel conditions become difficult, Maximum Mechanical Services will arrange for alternate transportation for the injured employee:

- **Suitability** Based on travel distance and the types of acute illnesses or injuries that are possible on the worksite.
- Weather Occupants will be protected from weather conditions.
- **Communication** Occupants will have a source of communication to interact, if necessary, with the medical care facility they are traveling to.
- **Transportation** Mode of transportation will be able to accommodate a stretcher as well as an accompanying attendant.

Injury/Illness Emergency Flowchart



Effective Date: Revision Date: Revision No.:

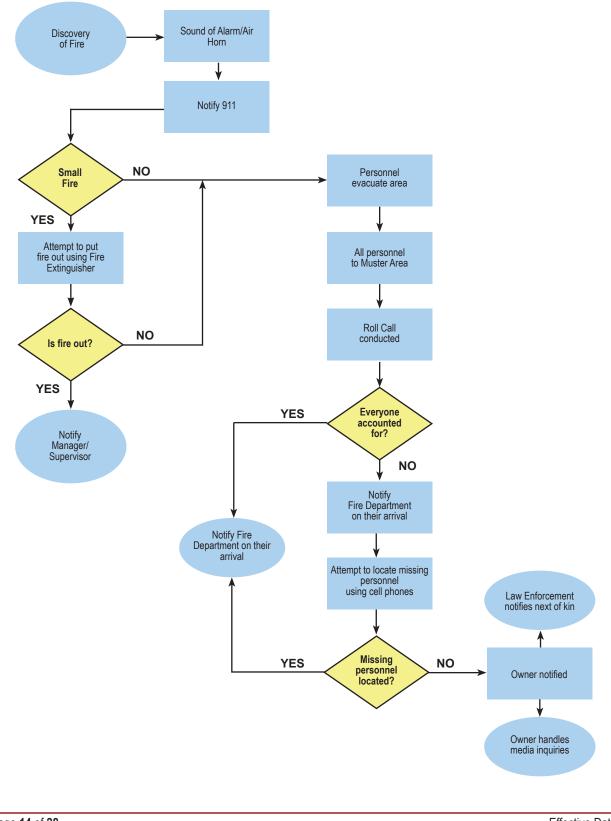
Fire

Depending on the volatility and intensity of the fire, it may be possible to extinguish the fire within the first 30 seconds of ignition or discovery. During the first thirty (30) seconds, emergency response procedures should be followed by anyone discovering or involved in a fire.

- 1. The first person on scene will ensure to take precautions to protect themselves from any danger, and then proceed to secure the area, assessing the potential dangers (i.e., size of the fire, explosion hazards, danger of falling objects, etc.).
- 2. Sound the alarm.
- 3. Call 911 immediately, if telephone service is available.
- 4. Follow evacuation plan, if required.
- 5. Determination made if the fire can be safely controlled using a fire extinguisher.

When directed to evacuate a building (warehouse, compressor building, etc.) under threat of fire, employees should adhere to the following:

- Leave lights on, doors closed and windows closed, but not locked.
- Stay as low as possible (crouch down) to stay under the smoke (may be toxic).
- If clothing catches fire, drop and roll to put out flames.



Fire Emergency Flowchart

MMS-HSE-MS-V.5 - September 7, 2022

Effective Date: Revision Date: Revision No.:

Use of Fire Extinguisher

Remember the word PASS:

- Approach the fire from upwind if possible.
- Do not walk on an area that you have extinguished in case the fire reignites or the extinguisher runs out.
- The metal part of the CO₂ extinguishers tends to get dangerously cold ensure you are holding the extinguisher properly.
- Hold the extinguisher in an upright position.
- Direct the extinguisher at the base of the flames until the fire is completely out.
- Replace the pin and return it to your compartment.
- Once the fire is out, do not walk away! Watch the area for a few minutes in case it reignites.
- Report the use of the fire extinguisher to your supervisor so that it may be recharged immediately.
- Check to ensure the extinguisher was recharged before it is returned to the workplace.



P ull the pin and point the nozzle away from you.



A im low and direct the extinguisher at the base of the fire.



S queeze the handle slowly and evenly. Continue to squeeze until the fire is out and/or the fire extinguisher is empty.



Sweep the extinguisher from side-to side. Start at one side of the fire and slowly work to the other side. Do not start in the middle of the fire.

Bomb Threats/Suspicious Package

- Notify supervisor immediately.
- Evacuate immediately and proceed to the muster point without disturbing the object.
- Call 911 for assistance.
- Carry out a head count to ensure all personnel are accounted for.
- Wait for the all-clear sign to be given by supervisor or authorities before re-entering the work area.

Receiving a bomb threat is a terrifying experience. If you receive a bomb threat, don't panic. Instead, remain as calm as possible and obtain relevant information from the caller or person on location. If possible, have a co-worker contact 911 while you are talking to the person posing the bomb threat. Should a bomb threat be received over the telephone, the following information should be written down:

- Time of call
- Date of call
- · As close as possible to the exact words used by the person making the threat
- Speech characteristics
- Background noises

Suspicious Package

You know what kind of mail and packages you usually get. Look for things that are out of the ordinary. Something may be suspicious if several of these features are present:

- Powdery substance felt through or appearing on the package or envelope.
- Oily stains, discolorations, or odour.
- Lopsided or uneven envelope.
- Excessive packaging material such as masking tape, string, etc.
- Excessive postage.
- Handwritten or poorly typed addresses.
- Misspellings of common words.
- Strange return address or no return address.
- Incorrect titles or title without a name.
- Not addressed to a specific person.
- Marked with restrictions, such as "Personal," "Confidential," or "Do not x-ray".
- Marked with any threatening language.
- Postmarked from a city or state that does not match the return address.
- Excessive weight.

- Ticking sound.
- Protruding wires or aluminum foil.

If a package or envelope appears suspicious, DO NOT OPEN IT.

Handling of Suspicious Packages or Envelopes

- **Do not** shake or empty the contents of any suspicious package or envelope.
- **Do not** carry the package or envelope, show it to others or allow others to examine it.
- **Do not** sniff, touch, taste, or look closely at it or at any contents which may have spilled.
- Do put the package or envelope down on a stable surface.
- **WASH** hands with soap and water to prevent spreading potentially infectious material to face or skin.
- Seek additional instructions for exposed or potentially exposed persons.

Unwelcome Visitor

- First ask if the person has an appointment.
 - If no, let them know to schedule an appointment with the person, as the policy is by appointment only.
 - If the person becomes agitated, ask them to leave at once.
- Notify supervisor immediately to have the person escorted off the premises and/or contact 911.

Motor Vehicle Collisions

In the event that a breakdown occurs on route and the vehicle is still mobile, the vehicle must be parked at the nearest safe location such as the nearest wide spot on the roadway. The vehicle is not to be driven to the nearest repair facility, or place of convenience for the driver or carrier, until it has been determined the breakdown does not include a major defect that could prevent the safe completion of the trip without causing further damage to the equipment.

In the event that a vehicle becomes immobile on a roadway including the shoulder, merge lanes or exit ramps, the operator must ensure that measures are taken to allow other motorists to react to the situation.

In the event of a motor vehicle collision, employees are to:

- Assess the situation and assure their personal safety and safety of others.
- Pull off the road if possible.
- Place reflective warning triangles, flares or both behind and ahead of the accident scene.
- Contact 911 (ambulance or other emergency services as required).
- Administer first aid, if practical.

- Move the vehicle off the road to the shoulder if there are no injuries and the vehicle can be driven.
- If there are injuries, or vehicle damage over \$1,000.00 call the local authorities. Request a police report and call your company contact.
- Report the incident to your supervisor as soon as possible.
- Take notes to document the accident, including the following:
 - Time
 - Location
 - Nature of incident
 - Names of witnesses
 - Sketches or photos, if possible
 - Obtain insurance information from other party

Weather Emergencies and Natural Disasters

In the event of a severe storm or tornado warning:

- 1. Supervisor will be informed.
- 2. Employees will be directed to take shelter as required and follow company/site protocols.
- 3. A headcount will be done to confirm that all personnel are accounted for.
- 4. In the event of pending blizzard conditions or extreme cold (making travel hazardous), the supervisor will determine if employees should be sent home early.
- 5. Employees are expected to use their discretion in driving to and from work in adverse conditions and follow the "safe journey" management practices.
- 6. In the event of a power failure or disruption employees will assemble at designated muster points and return to work only after power and lights are restored.
- 7. Employees trapped where emergency backup lights are not working are to remain where they are until personnel arrive with flashlights to guide them to safety.

Types of Storm Fronts

When a severe storm front goes through the worksite, the procedures detailed below will be followed to see that employees are sheltered. A head count will be conducted by supervisor to confirm that all personnel are accounted for.

Severe Lightning Storms

- Avoid all lakes, sloughs and any other open body of water.
- Avoid tops of buildings, high lines, vessels or crane operation.
- Avoid construction equipment.
- If driving, park the vehicle off the road and activate the 4-way flashers until the storm has passed.

Tornado

- Keep as low to the ground as possible. Stay inside a structure if possible, but stay away from all
 exterior doors and windows, or equipment.
- If shelter is not available, find some low ground or a ditch and lie down with the head protected.

Blizzard

When employees are working in remote areas where weather warnings are not always available, the following procedures will be adopted:

- Always be alert to prevailing weather conditions.
- Wear clothing to suit conditions (i.e., heavy-duty winter protection or survival equipment).
- Avoid sweating and exposure to cold. In cold weather, employees should work in pairs and conduct ongoing buddy checks for frostbite, or any other signs of distress.
- Employees should not travel unnecessarily or alone.

Flooding

Employees working in areas where flooding could occur should be prepared to take appropriate action when a weather warning is issued:

- When required, post a flood watch with an appropriate warning device.
- Have procedures in place to leave on very short notice.
- Take only equipment or tools to do immediate tasks (i.e., only what can be mobilized in one trip).
- If evacuation occurs, shut down all equipment, gas valves, etc. Do not touch wet electrical equipment. Only work with dry electrical equipment.
- Avoid travelling through flooded areas, especially at night when potential dangers cannot be seen.
- Know high ground safety areas, evacuation routes and location of emergency equipment.

Structure or Equipment Failure

If a structure has collapsed or equipment has been involved in an incident, the general procedures below should be followed:

- Secure the area where the incident occurred, if safe to do so.
- Notify your supervisor.
- Only personnel who are giving medical aid can remain in the area; all other employees are to leave the area.
- Turn off area utilities (power, water, gas) as quickly as possible, if it is safe to do so.
- Make no attempt to clean up or make repairs until supervisor has given the "all clear."

Gas Line Rupture

Hitting a natural gas line is dangerous. If it occurs, take immediate action.

- Sound the alarm.
- All personnel to leave the area immediately and move cross wind, if possible.
- Report it to your supervisor.
- Account for all personnel.
- Ensure to keep everyone away from the area.
- Allow gas to vent into the air.
- Keep all ignition sources away.
- Shut off any equipment.
- Call the gas company in the area or 911. Make sure if using a cell phone you are a safe distance away from the release of product.
- Call immediately, even if you do not smell gas or hear it escaping.
- Do not try to repair the line yourself.

Septic Contamination

- Wear all the appropriate PPE to eliminate the chance of contaminants contacting the skin (goggles, face mask, rubber-coverall clothing, waterproof gloves, rubber boots).
- If a splash does contact the skin, wash off with soap and water.
- If splash does enter the mouth, spit out saliva from the mouth and rinse and discard fluid repeatedly for several minutes.
- Source out vaccination shots for Hepatitis A & B. (Twinnrix).

Employees Unaccounted

All employees who may be working alone must follow the Working Alone Policy. If any employee exceeds the maximum timeline for attempting to establish contact, respond with the following:

- Access the situation and determine immediate priorities.
- Mobilize an emergency response team to the last known location of employee.
- Conduct search and rescue operation in conjunction with emergency services.
- Contact employee's emergency contact as per company policy.

Power Outage

- Use emergency lighting available.
- Trained and qualified personnel to determine the nature of the outage. Unqualified workers should not open electrical access panels to view unguarded circuits.
- Determine the nature of the outage.
- Contact service providers to determine time frame of outage.

Biological Hazards: Pandemic

- Contain any infected persons in their location isolate and restrict movement.
- Advise persons who have had contact with the infected persons to stay where they are -isolate and restrict further movement.
- Report to Public Health and await instruction on protocols and next steps.
- Receive direction from appropriate medical specialists and proceed accordingly.

TDG Release Reporting

In Alberta, any TDG release or anticipated release must be reported by the carrier. The first call for TDG release is to EDGE (Environmental and Dangerous Goods Emergencies), which operates 24 hours a day and 7 days a week to provide information to the public and industries on dangerous goods compliance.

Alberta EDGE is also an emergency response center for all TDG and Environmental incidents within Alberta.

Alberta EDGE provides:

- Compliance information related to the federal and provincial dangerous goods legislation.
- Federal and international requirements for the shipment of dangerous goods by air, road, rail or marine modes of transportation.
- Interpretive information for the on-highway enforcement and facility process as well as awareness material for inspectors, industry and the general public.

Emergency Reporting

Alberta EDGE:

- manages all TDG emergency calls and assesses the severity of dangerous goods incidents.
- provides assistance to emergency response personnel attending the scene of an incident in which dangerous goods are involved, or may become a matter for concern.
- communicates openly with other regulatory agencies, such as Alberta Environment and Parks and Alberta Energy Regulator (AER), in the event of an emergency or safety-related incident.

More information

For more information, see Transport Canada's comprehensive list of questions and answers about the transportation of dangerous goods: Safety Awareness Materials and FAQ.

- Alberta EDGE:
 - Phone: 780-422-9600
 - Toll free: 1-800-272-9600

Hazardous Substance Release or Spill

Chemical materials will be stored in appropriate areas and in proper containers to minimize the risk of a hazardous spill. If employees are required to control a release of a hazardous substance, clean up a spill, or carry out testing before re-entry, Maximum Mechanical Services will provide the following:^{8,}

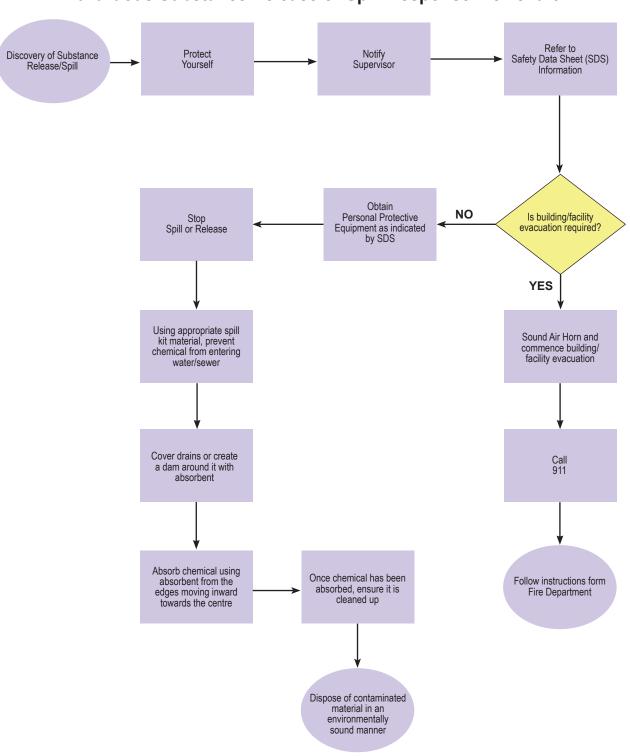
- Appropriate PPE (based on risk assessment), which will be adequately maintained and readily available to employees.
- Material and equipment necessary for controlling and disposing of the hazardous substance. Spill kits will be easily accessible and contain the required supplies for the materials that may be spilled. (Review amount and substance at the Toolbox/Tailgate Meeting/pre-job hazard assessment).
- Spill kits, which will be part of the daily inspection items with adequate supply inventory available.

Immediately upon a release or spill occurring, steps should be undertaken to implement the spill plan, which consists of the basic steps given below. Refer to the Safety Data Sheets (SDS) for more detailed information and procedures.

- 1. Stop the flow by:
 - shutting off pumps, valves or nozzles, or activating the emergency shut-down switch.
 - blocking ditch lines, culverts or drains.
 - surrounding the spill with earth berms, spill booms, pads, etc.
- 2. Warn others in the immediate vicinity of the spill or release.
- 3. If there is a danger of fire or explosion:
 - No Smoking in the area.
 - Secure the area.
 - Contain the spill (use required personal protective equipment).
- 4. Extinguish any open flame.
- 5. Block ditch lines, culverts or drains.
- 6. Surround the spill with earth berms, spill booms, pads, etc.

⁸ Alberta Occupational Health and Safety Code, Part 29 - WHMIS, Section 397 - Training

- 7. Notify applicable personnel (supervisor, client).
- 8. If an airborne vapour is released, or an uncontrolled liquid is spilled, notify local police or RCMP immediately (Reference Emergency Response Contact List at the end of this section). The risk of the airborne vapour may require site/public evacuation in the immediate vicinity.
- 9. For environmental spills, contact the environmental authorities (Reference Emergency Response Contact List at the end of this section). They may require public evacuation in the immediate vicinity.
- 10. In most cases, start spill clean-up as soon as possible to prevent further spread of any liquid substance into storm drains, floor drains, flowing water or groundwater. Soak up excess fluids using suitable absorbent materials.
- 11. Dig up affected material and put in proper environmental disposal containment bags, if required.
- 12. Use remediation agent (such as Oil Gator[™]) on the remaining area.



Hazardous Substance Release or Spill Response Flowchart

MMS-HSE-MS-V.5 - September 7, 2022

Effective Date: Revision Date: Revision No.:

First Aid Requirements

Maximum Mechanical Services certified first aiders will promptly assist and render first aid to employees if they suffer an injury at work. Maximum Mechanical Services will transport injured employees or will provide transportation for medical treatment. Maximum Mechanical Services will also provide equipment, services, supplies, attendants and facilities in accordance with applicable *Alberta Occupational Health and Safety Code*-Part 11 - First Aid.⁹

All personnel at Maximum Mechanical Services's work locations will have access to first aid treatment during work hours. In some cases, a mobile treatment center will be available for use. First aid services, equipment and supplies will be located at or near the work location. Designated first aiders will be identified and communicated to all employees.

First Aid Assessment

Maximum Mechanical Services will conduct regular assessments regarding the following information:

- The number of employees who may require first aid at any time.
- The nature, extent and rating (low, moderate or high) of the risks and hazards in the workplace.
- Types of injuries likely to occur.
- Barriers preventing first aid services.
- Transportation time of an injured employee to receive medical attention.

Maximum Mechanical Services will review the assessment:

- within twelve (12) months after the previous assessment of review.
- when a significant change in operation occurs.

Designated First Aiders

Maximum Mechanical Services will comply with applicable *Alberta Occupational Health and Safety Code*, Part 11-First Aid with respect to the following:¹⁰

- Required number of first aiders at a worksite.
- Required qualifications and training.
- Designated first aiders will provide documentation of training or certification received from an accredited training agency.

⁹ Alberta Occupational Health and Safety Code, Part 11 - First Aid, Section 178 - Providing Services, Supplies, Equipment

¹⁰ Alberta Occupational Health and Safety Code, Part 11 - First Aid, Section 181 - First Aid Providers

Medical/First Aid Equipment

Medical/first aid equipment and supplies will be readily available and clearly identified, clean and dry, ready for use and protected from the elements (exposure to heat, cold, wind and moisture). First aid kits and fire extinguishers will be provided in company owned and operated vehicles.¹¹

Medical/First Aid equipment includes the following:

- First Aid kits •
- Fire extinguisher •
- Stretchers Blankets
- - Splints
- Eye wash stations . Emergency showers

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. Additional first aid supplies (bandaging, antiseptics, etc.)

At minimum, the location of first aid equipment will be communicated to all employees. Worksites will have signage posted in highly visible locations to indicate where first aid equipment can be found. If signage is not practical, information will be communicated to all employees by other means.

Non-Medical Equipment

Non-medical emergency response equipment will be readily available and clearly identified, clean and dry, ready for use and protected from the elements (exposure to heat, cold, wind and moisture).

Non-medical equipment includes, but is not limited to:

Spill kits

- Wind socks
- Fire extinguishers •
- Communication equipment (i.e., phones/radios)

Air horns .

Emergency lighting

Emergency Communication

If the worksite is located in a remote area, Maximum Mechanical Services will establish communication via cell phone. In the case of a non-serviceable cellular coverage area, work must be conducted by two individuals at all times, so that first aid can be administered in the event of an injury or illness. If required, help would then be summoned, once the injured employee/contractor has been treated.

Post Emergency Review

After each emergency response a post emergency review will be completed to review the performance and quality of the response in order to identify opportunities to improve the plan.

¹¹ Alberta Occupational Health and Safety Code, Part 11 - First Aid, Section 178 - Providing Services, Supplies, Equipment

Record Retention

Emergency response drills are to be recorded and kept on file for three (3) years.

Media Relations

If an employee is approached by the media for information, the employee will be courteous and explain that information will be provided by Senior Management or appointed spokesperson. The employee should not offer personal comments or opinions.

Emergency Response Contacts - Alberta

EMERGENCY CONTACT NAMES = A	EMERGENCY CONTACT PHONE	
Maximum Mechanical Services		(780) 761-2500
Gord Alexander	(780) 918-0004	(780) 761-2500
Darren Alexander	(780) 297-3427	
Alberta Human Resources and Employment, Workplace Health and Safety (Formerly OH&S)	Provincial Wide	1 (866) 415 8690
WCB – Injury Report Line	Landline	1 (800) 661-9608 1 (800) 661-1193
Alberta Environmental Protection Pollution Emergency Response Team	Fax Line	*7378 1 (800) 222-6514
WCSS – Western Canada Spill Services	PERT – Free Dial Telus Mobility	1 (866) 541-8888
ALBERTA EDGE	24-Hour Information Centre	1 (800) 272-9600
Forest Fires Report	Alberta	310-FIRE (3473)
Poison Control	Alberta	1 (800) 332-1414
Alberta One Call	Alberta	1 (800) 242-3447
Fortis Alberta (Electrical Emergencies)	Alberta	310-9473
Enmax Alberta (Electrical Emergencies)	Alberta	310-2010

DIAL 911

For province-wide emergencies (fire, medical emergency, STARS Air Ambulance or Police)

Appendix - Pandemic Preparedness Response Plan

Objective

The objective of this Protocol is to manage the impact of a pandemic or other public health crisis on employees and business activities using two main strategies:

- Containment of the disease by reducing spread within the Business.
- Maintenance of critical services if containment is not possible.

Policy

Maximum Mechanical Services has developed and maintained this Pandemic Response Plan addressing the following areas:

- The Pandemic Preparedness Response Plan leadership will be identified as a small team that will oversee the creation and updates of the plan. The leadership will also be responsible for developing internal expertise on the transmission of diseases and other areas such as second-wave phenomenon to guide planning and response efforts. However, as with any other critical position, the leadership must have trained alternates that can execute the plan should the leadership become unavailable due to illness..
- The creation of a communications plan before and during an outbreak that accounts for congested telecommunications services.
- An alert system based on monitoring of World Health Organization (WHO), the Centers for Disease Control (CDC), and other federal, provincial and municipal sources of information on the risk of a pandemic disease outbreak.
- A predefined set of emergency policies that will preempt normal Maximum Mechanical Services
 policies for the duration of a declared pandemic. These emergency policies are to be organized
 into different levels of response that match the level of business disruption expected from a
 possible pandemic disease outbreak within the community. These policies should address all tasks
 critical to the continuation of the company including the following:
 - How people will be paid.
 - Where people will work including staying home with or bringing kids to work.
 - How people will accomplish their tasks if they cannot get to the office.
 - What work will be suspended during the pandemic.
 - Communication plan and cadence throughout the pandemic.
 - Alternate means to communicate during the pandemic.
 - What operational procedures may need to be altered, amended, or suspended, such as those over facilities, visitors, and non-essential activities and events.

- An employee training process covering personal protection including:
 - Identifying and broadly communicating the symptoms of exposure.
 - The concept of disease clusters in daycares, schools or other large gatherings.
 - Basic prevention such as limiting contact closer than 6 feet (2 metres), cover your cough, hand washing.
 - When to stay home along with encouragement to do so.
 - Avoiding travel to all areas with high infection rates.
- A process for the identification of employees with first responders or medical personnel in their household. These people, along with single parents, have a higher likelihood of unavailability due to illness or childcare issues.
- A process to identify key personnel for each critical business function and transition their duties to others in the event they become ill or unable to perform their respective duties.
- A list of supplies to be kept on hand or pre-contracted for supply, such as face masks, hand sanitizer, fuel, food and water.
- IT related issues:
 - Ensure enterprise architects are including pandemic contingency in planning.
 - Verification of the ability for significantly increased telecommuting including bandwidth, VPN concentrator capacity/licensing, ability to offer voice over IP and laptop/remote desktop availability.
 - Increased use of virtual meeting tools that facilitate video conference and desktop sharing capabilities.
 - Identify what tasks cannot be done remotely.
 - Pre-negotiated arrangements with key vendors in the event current licensing will not meet this change in work force habits.
 - Determine if any IT colleagues need to remain onsite to support critical operations.
 - Plan for how customers will interact with the organization in different ways.
 - Expectations concerning printing work documents on personal printers.
 - Expectations about sending work emails and documents to personal email accounts.
- The creation of exercises to test the plan in advance.
- Performing a retrospective review to identify and solve for issues encountered in the test or during the actual emergency.
- The process and frequency of plan updates and review at least annually with appropriate approvals or sign-off from organizational leadership or oversight.
- Guidance for auditors indicating that any review of the business continuity plan or enterprise architecture should assess whether they appropriately address the Maximum Mechanical Services Pandemic Response Plan.

Policy Compliance

Compliance Measurement – The management team will verify compliance to this policy through various methods, including but not limited to periodic walk-thru, emergency drills, inspection, internal and external audits, and feedback to the policy owner.

Exceptions – Any exception to this policy must be approved by the management team in advance and revalidated annually.

Non-Compliance – An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Organizational Responsibilities

This Protocol is maintained and updated by Maximum Mechanical Services with input and support from other departments and/or external parties as required. The following outlines key responsibilities by department or area as detailed in the Protocol:

- Management is responsible for the leadership and coordinating activities related to public health emergencies.
- Health services (under management), if applicable, is responsible for monitoring health emergencies and making a recommendation to activate the emergency response team, if applicable.
- Health services is responsible for recommending enhanced risk treatments.
- Critical and essential functions (central functions and business units) are responsible for their business continuity plans to maintain critical and essential process during a public health emergency.
- Emergency management, if applicable, maintains the response structures.
- The public health emergency support team, if applicable, is responsible for coordination and management of public health emergencies.
- For businesses without all of the above-mentioned departments it will be up to the owner/director or president in conjunction with the safety department/person to monitor and capture all of the above. The president will appoint a coordinator or department for this pandemic plan. This pandemic plan has been reviewed and accepted by the president or coordinator of this plan.

Monitoring Communications

Maximum Mechanical Services will ensure that employees have adequate information on public health emergency issues to allow them to make informed decisions regarding illness prevention. During a public health emergency, notices will be posted in entrance areas of manned worksites. Information on the public health emergency and the impact will be shared regularly with employees to address concerns and to reduce stress and anxiety.

Any employee concerns on public health issues should be directed to the health officers, the health manager or to the management.

Maximum Mechanical Services will actively monitor the following information sources to identify any emerging public health issues including pandemics:

- World Health Organization (<u>https://www.who.int</u>)
- US Department of Health and Human Services (<u>http://www.hhs.gov</u>)
- Centre for Disease Control (<u>http://www.cdc.gov/</u>)
- Pandemic Flu (<u>https://www.cdc.gov/flu/pandemic-resources/</u>)
- Public Health Agency of Canada (<u>www.phac-aspc.gc.ca</u>)
- Alberta Health Services (<u>www.albertahealthservices.ca</u>)
- Saskatchewan Health Services (https://www.saskhealthauthority.ca/)
- B.C. Health Services (https://www.healthlinkbc.ca/)
- Northwest Territories (<u>https://www.hss.gov.nt.ca/en)</u>

Management will maintain contact with appropriate representatives from the various business units during a public health emergency and in preparation for such an event.

In the event of a public health emergency, this plan will provide overall coordination and would:

- determine when and if the containment/social isolation strategies would be initiated. These strategies include:
 - Enhanced cleaning protocols
 - Travel restrictions
 - Conducting meetings via teleconference
 - Working at home or remotely
 - Minimizing human-to-human contact
 - Sharing information electronically
 - Limiting non-essential work.
- communicate with critical and essential functions.
- coordinate communications across the entire company.

Prevention

The key methods identified to prevent a public health emergency are:

- Access to information
- Respiratory hygiene

- Hand washing
- Isolation during illness
- Vaccinations

Good hygiene practices such as hand washing and use of hand sanitizers will be encouraged by the supervision. Maximum Mechanical Services will ensure that hand washing facilities, hand sanitizers, tissues, no touch trash cans, hand soap and disposable towels will be available for employees.

To protect yourself and others:

- Keep a safe distance within 6 feet (2 metres) from other people.
- Avoid close contact with people who are sick.
- Practice frequent hand washing with soap and water for at least 20 seconds.
- The use of hand sanitizer is strongly suggested if you come in contact with surfaces that have not been sanitized.
- Immediately dispose of any tissues you have used into the garbage as soon as possible.
- Cover coughs and sneezes.
- Avoid touching eyes, nose and mouth with unwashed hands.
- Ensure work surfaces (i.e.: desks and tables) and objects (i.e.: telephones, keyboards) are kept clean and wiped with disinfectant regularly.
- Stay at home and away from others if you are feeling ill or caring for others.
- Employees should consider working from home using methods such as (i.e.: tele-communications, webinars, conference calls, etc.) if these are available.

Wearing Face Covering and Masks

All Provincial face covering/mask requirements must always be followed:

Masks should complement, not replace other prevention measures such as physical distancing and good hand hygiene.

Masks can become contaminated on the outside or when touched with hands. It is important that masks are used and disposed of properly. If worn incorrectly, infection can be accidently spread instead of preventing it.

Enhanced Cleaning

During a public health emergency, all employees shall implement enhanced cleaning measures and practices at their work locations. Enhanced cleaning measures should include:

• All door handles, railings and personal workstation areas should be wiped down twice a day with a disinfectant. (Disinfectant wipes, Isopropanol alcohol 70% or more, or other similar means).

- The United States Environmental Protection Agency (EPA) maintains listing of disinfectants that can be used against common pathogens like norovirus and corona virus. (<u>https://www.epa.gov/pesticide-registration/selected-epa-registered-disinfectants</u>)
- Cleaning of air filtration and conditioning systems.
- Cleaning of common use telephone headsets on a daily business.
- Confirm use of appropriate cleaning solutions in common areas.
- No sharing of cups and glasses and washing with hot water and soap between uses.
- The removal of magazines and newspapers from common areas.

Maximum Mechanical Services will ensure that a supply of disinfectants and necessary cleaning supplies are available to employees at all times and that they will use those to ensure that work areas, vehicles and equipments will be kept clean as per company's housekeeping requirements.

Immunization

Employees will be encouraged to obtain appropriate immunizations to help avoid disease. Vaccinations will build resistance to prevent and avoid illness or disease and access will continue to be supported across the company. When vaccines become available to the public and in the community, Maximum Mechanical Services will consider granting time off to obtain the required vaccines.

Restrictions on Gatherings

Gatherings must be compliant at all times with provincial gathering restrictions.

Worksites, Meetings and Events

Social distancing refers to strategies to reduce the frequency of contact between people. These strategies include the following:

- Reduce face-to-face meetings, increasing the use of telephone and video conferences, and increase reliance on the electronic exchange of information.
- Minimize meeting times and meeting in large rooms, reducing contact.
- Whenever possible, physical contact with co-workers should be minimized (i.e.: avoid hand shaking, avoid lunch/break rooms).
- The use of shared workstations should be minimized or increased cleaning between use should occur.
- If possible, avoid public transportation.
- Consider flexible work hours, staggered shift changes, staggered lunch hours.
- Avoid unnecessary travel.

- Avoid cafeterias and restaurants.
- In person gatherings that involve higher risk participants are not allowed.
- In person gatherings must have additional risk mitigation measures in place, such as wearing of applicable face coverings, providing sanitizer stations and safe distancing between attendees.

Isolating and Quarantining

Isolating and quarantining are required to help prevent the spread of illnesses by reducing the number of people one can infect.

Provincial isolating and quarantining requirements must be met at all times.

Detailed requirements include but are not limited to (i.e.: test results, symptoms, close contacts, travel). You can isolate yourself by following these self-isolation guidelines:

You can isolate yourself by following these self-isolation guidelines:

- Avoid close contact with other people, especially those with chronic conditions, a compromised immune system, or seniors.
- Do not attend work, school, social events or any other public gatherings.
- Watch for symptoms like fever, cough or difficulty breathing in yourself or a family member.

Travel Protocol

Business Related Travel

Any direction from federal and provincial levels pertaining to all travel restrictions shall be applied and implemented. During a travel restriction period, all employees are to consider alternate means, such as video conferences or postponing/moving their meetings to a later date. Any business-related travel must be approved by the supervisor prior to booking a trip.

No Business-related travel to any affected countries as identified on the current list by the Public Health Agency of Canada (<u>https://travel.gc.ca/travelling/health-safety/travel-health-notices</u>). If any employee is returning from any one of the mentioned countries on the list will have to follow the self-isolation or the quarantine protocols as required by federal and provincial authorities.

Employee Personal Travel

All employees are to consider any personal travel they may have planned to any countries, including all cruises, as listed/identified by the Public Health Agency of Canada (<u>https://travel.gc.ca/travelling/health-safety/travel-health-notices</u>). Employees who continue with their travel to affected Countries or go on a cruise must let their supervisor know and advise management via email.

Training and Communication

Training shall be administered in two phases consisting of new employee orientation or reassigned orientation, and regular periodic training. Employees will receive training on health issues of the pertinent disease which will include:

- Prevention of the illness, initial symptoms
- Prevention of spreading the disease using proper hygiene techniques
- The appropriate return to work duration after an illness

All supervisors are responsible for communicating with their respective employees about occupational safety and health issues. A system of open communication between employees and management shall be established to facilitate the reporting of injuries, unsafe conditions, and suggestions to improve safety. Forms of communication can be performed by, but not limited to:

- Toolbox and safety meetings
- Safety bulletins
- Emails, phone call, radio

In the event of non-English speaking employees or those with disabilities, their additional need will be considered as the need arises.

Communications will address, among other things, the following:

- Inform staff of the importance of basic personal hygiene
- Provide regular updates

Internal Communications

The internal communications procedure will follow the existing ERP contact information for the company.

All communications during this time will be done in accordance with self distancing strategies and gathering restrictions of this plan.

External Communications

The external communications procedure will address the existing customers, clients, vendors, suppliers, contractors and DSPs. Notifications will be sent to inform that an outbreak/pandemic has impacted the company's ability to perform as well as a notification when normal operations will or have resumed.

Business Continuity Plan

Management

- Convene and schedule daily meetings and/or updates.
- Assess immediate priorities and actions.
- Cancel non-critical meetings and public gatherings.
- If employee absence reaches levels that prevent normal business operations, cease all non-critical business activities.
- If pandemic impact prevent safe operation of any facilities, these must be shutdown.

Supervision

- Monitor levels of employee absenteeism.
- Report daily to management.
- Advise on home working policy and who will qualify.

Operations (if applicable, Management to perform if no Operations)

- Assess business risks and priorities.
- Implement business contingency plans (i.e., shutdowns, reduced teams, etc.).

Health/Janitorial/Custodial Services (if applicable, Management to perform if no HS)

- Ensure proper public health and personal hygiene measures with extra attention to toilets, handrails, telephones, etc.
- Implement disinfection measures for surfaces.

Preparedness

At a minimum, this plan will be reviewed annually. Refresher training and awareness sessions will be provided as required. To assess the effectiveness of this plan exercises may be scheduled. Any improvements or recommendations will be incorporated into the plan. To assist employees in personal preparations information will be regularly shared

Following a pandemic event, the person responsible for implementation of the plan will identify learning opportunities and take action to implement any corrective actions to further enhance the plan.

Section 6 – Incident Management Program

Purpose

The purpose of the Incident Management Program is to effectively manage incidents of all types. Each incident will be investigated to determine causal factors and root cause in order to establish and implement control measures to reduce the possibility of reoccurrence. All incidents will be investigated regardless of severity, as the ultimate goal is prevention.¹

Maximum Mechanical Services has developed an Incident Classification Process to ensure that all incidents that cause, or have the potential to cause, injury or illness; damage to equipment or property, environment; or regulatory non-compliance will be recorded and tracked.

Definitions

Causal Factors – A mistake or failure that, if corrected, could have prevented the incident from occurring or would have significantly mitigated its consequences.

Illness – An illness is any abnormal condition or disorder, other than one resulting from an injury, caused by exposure to environmental factors associated with employment. It includes acute and chronic illnesses or disease that may be caused by inhalation, absorption, ingestion, or direct contact, as well as repetitive strain cases (i.e., carpal tunnel syndrome) and potentially other "ergonomically induced" conditions. Illnesses include mental stress and psychiatric disorders that directly result from objectively verifiable psychologically traumatic events.

Incident – An incident is an unintended occurrence that did result, or could have resulted, in injury, damage, or loss. This includes all occupational injuries/illnesses, damage to property, damage to the environment, and loss to processes.

Root Cause – A root cause is a cause that if identified and fixed will prevent the final undesirable event from reoccurring. Root cause of an incident generally relates to deficiencies or failures of management systems.

Root Cause Analysis – The search for the best practices and/or the missing knowledge that will keep a problem from reoccurring.

Major Near Miss – A near miss assessed by management using the risk matrix to have a medium or high risk ranking for probability or severity of impact to Maximum Mechanical Services or an employee, if processes and procedures do not change.

Near Miss – A near miss occurs when an incident is narrowly avoided. It may have resulted in no consequences or only minor consequences, but the potential for more severe consequences was great.

¹ Alberta Occupational Health and Safety Act, Part 5 - Program and Practice, Section 40

First Aid – A work related incident that typically does not require attention from a health care professional. First aid includes visit to health care professional solely for observation, non-prescription medication, wound covering, removal of foreign bodies from a wound (uncomplicated), removal of foreign bodies from an eye via irrigation or cotton swabs, treatment of 1st degree burn, hot or cold therapy, diagnostic test (i.e., x-ray, blood test), issuance of a non-rigid means of support, use of temporary immobilization devices (i.e. sling), use of eye patches, use of finger guards, tetanus immunization, cleaning of a wound on skin surface, drilling a nail to relieve pressure, drinking of fluids to relieve heat stress, and massage (except when prescribed by a health care professional).

Potentially Serious Incidents (PSI) – A PSI is any event where a reasonable and informed person would determine that under slightly different circumstances, there would be a high likelihood for a serious injury to a person.

Lost Time Incident (LTI) – A lost-time incident is a work-related injury that causes the injured person to miss work and become temporarily unable to perform any regular job or restricted work activity. A lost-time incident does not include regularly scheduled days off (i.e., normal days off, holidays) or the day on which the injury occurred. In cases where employment has been terminated, this would include any workdays lost that had been previously scheduled or an estimate of workdays that would be lost after termination.

Medical Treatment Incident – A work related incident which involves medical treatment from a health care professional followed by immediate return to work without restrictions. Medical treatment includes issuance of prescription medication, wound closing/suturing, removal of foreign bodies from a wound (complicated), removal of foreign bodies from an eye (except irrigation and cotton swab), treatment of infection, treatment of a bruise via blood drainage, treatment of 2nd/3rd degree burn, issuance of a rigid means of support, amputation/permanent loss of usage, vaccine (except tetanus), and cutting away dead skin.

Medical treatment incidents do not include:

- Visits to a physician or other licensed health care professional solely for observation or counselling.
- "First Aid" as defined in this section.

Roles and Responsibilities

Senior Management

Senior management's responsibilities concerning Incident Management Program include, but are not limited to the following:

- Ensure the prompt investigation of all incidents and major near misses.
- Review all incident investigation reports, provide feedback and sign-off.
- Communicate with family members of the employee(s) in the event of a major injury or death.
- Be Maximum Mechanical Services' spokesperson and communicate with the media, if required.
- Retain the services of a third-party investigator when required.

Middle Management

Middle management's responsibilities within the Incident Management Program include, but are not limited to the following:

- Report to government agencies as required under the *Workers' Compensation Act*, applicable occupational health and safety legislation as well as any other applicable legislation or regulatory requirements.²
- Be involved in the investigation of recordable incidents involving injury, equipment damage, property damage and spills.
- Determine the investigation process required and have all incidents investigated.
- · Coordinate the investigation of incidents and major near misses.
- Review investigation reports and determine what corrective actions are required and monitor whether the correction actions are completed on a timely basis.
- Review reports of dangerous work for completeness including a review for timely follow through on corrective actions.

Supervision

Supervision's responsibilities within the Incident Management Program include, but are not limited to:

- Ensure first aid is provided to any injured employee.
- Secure the incident scene, and protection of evidence.
- Notify management of all incidents involving injury, equipment damage, property damage and spills.
- Notify the client based on contractual reporting requirements.
- Lead the investigation of incidents and major near misses.
- Include an employee competent in the task related to the incident to assist with the investigation.
- Collect all statements from witnesses.
- Collect required evidence and supporting documentation such as pictures and related safety documentation.
- Follow-up as soon as reasonably practicable on action items identified through the investigation.
- Follow-up as soon as is reasonably practicable on any unsafe or harmful condition or action.

² Alberta Occupational Health and Safety Act, Part 5 - Program and Practice, Section 40 (2) – Serious Injuries and Incidents

Employee

Employee's responsibilities concerning Incident Management Program include, but are not limited to the following:

- Report and document all incidents/near misses as soon as reasonably practicable to respective supervisor.
- Fill out an employee incident report.
- Participate in the investigation of the incident/accident or near miss.

Legislative Reporting Requirements

Occupational Health and Safety (OH&S) Reporting Procedure³

The following types of incidents must be reported as per legislation:

- Serious injury or incident resulting in death of employee.
- An injury or incident resulting in hospitalization of employee.
- Explosion, fire or flood that causes or has the potential to cause a serious injury.
- Collapse of a crane, derrick or hoist.
- Failure or collapse of any component of a building or structure.
- Significant mining incidents (ground fall, ventilation failure, dam failure, other emergency).

Workers' Compensation Board (WCB) Reporting Requirements

Report to WCB if the incident results in, or is likely to result in:

- Lost time or the need to temporarily or permanently modify work beyond the date of the incident.
- Death or permanent disability (amputation, hearing loss, etc.).
- A disabling or potentially disabling condition caused by occupational exposure or activity (poisoning, infection, respiratory disease, dermatitis, etc.).
- The need for medical treatment beyond first aid (assessment by physician, physiotherapy, chiropractic, etc.).
- Incurring medical aid expenses (dental treatment, eyeglass repair or replacement, prescription medications, etc.).
- The Health and Safety Manager will complete the "Employer Report of Injury" as soon as they are made aware of any worksite injury. The completed report is to be submitted to the WCB within seventy-two (72) hours of the injury.

³ Alberta Occupational Health and Safety Act, Part 5 - Program and Practice, Section 40 (2) – Serious Injuries and Incidents

• The injured worker is required to complete the "Employee Report of Injury or Occupational Disease" as soon as possible, within the seventy-two (72) hour period.

Reporting and Investigation

Employees are required to report all incidents to their supervisor as soon as reasonably practicable, so action can be taken to minimize their impact of injury or damage.

The following are a list of reportable incidents and the information requirements for investigation:

Workplace Injury

Workplace injuries or discomfort in the body that may result in injury are to be reported to the supervisor as soon as is reasonably practicable. All workplace injuries are to be investigated.

Equipment/Property Damage

Any damage to vehicle, equipment or property is to be reported to the supervisor as soon as reasonably practicable. All equipment and property damage including motor vehicle incidents are to be investigated.

Near Miss

All near misses are to be reported to supervision as soon as reasonably practicable. All near misses will be reviewed and analyzed for corrective actions. Based on risk assessment, supervision in consultation with middle management will determine if an investigation will be required.

Environmental Spill

Any spill on the worksite is to be reported to the supervisor as soon as reasonably practicable. All spills are to be investigated.

Potentially Serious Incidents (PSI)

A PSI is reportable when:

- the incident had a likelihood of causing a serious injury or illness, and
- there is reasonable cause to believe that corrective action may need to be taken to prevent recurrence.

A PSI is not limited to workers. If someone who isn't a worker is involved, it's only a potentially serious incident if it resulted from work activities at the work site or could have happened to a worker.

When determining whether an incident is a PSI, the following factors should be taken into consideration:

• Actual circumstances of the incident (person, place, time, work practices being followed)

- · Hazards present at the time of the incident
- Appropriate controls in place at the time of the incident
- Slightly different circumstances (timing, distance, body position, etc.) that may have resulted in a serious injury

Reporting PSIs

Use the online form to report PSIs. Submit PSI reports after an investigation is complete, as required by Section 33(6) of the *Occupational Health and Safety Act*.

To meet their obligations under the Act, the employer or prime contractor (if there is one) must also:

- carry out an investigation of the incident.
- prepare a report that outlines their investigation, including any corrective actions taken.
- ensure a copy of the report is readily available and given to an OHS officer on demand.
- provide a copy of the report to a Director, the joint health and safety committee or health and safety representative, if applicable. If there is no committee or representative, a copy must be made available to workers once the investigation is complete.
- retain a copy of the report for at least 2 years after the PSI.

PSI reporting is the responsibility of the employer or prime contractor, if there is a prime contractor. If a worker wishes to report an incident, they will be directed to contact the OHS Contact Centre.

An employer is not required to secure the scene of a PSI.

PSI reports are not admissible as evidence for any purpose in a trial arising out of the injury or incident, except in a prosecution for perjury or for the giving of contradictory evidence.

Incident Investigations

Management, Supervision and JHSC Members/HS Representative with support from the employees will investigate reportable incidents and major near misses.

Incident Reporting

Internal Reporting Requirements				
Incident Type	Report to	Reporting Timeline	Report Documentation	
Near Miss	Supervisor	Immediately	Incident Report	
Injury/Illness	Supervisor	Immediately	Incident Report	
Property Damage	Supervisor	Immediately	Incident Report	
Vehicle Incident	Supervisor	Immediately	Incident Report	
Hazardous Product Spill	Supervisor	Immediately	Incident Report	

Draft alerts in the Emergency Incident Notification System, the JHSC will finalize

External Reporting Requirements				
Incident Type	Report to	Reporting Timeline	Report Documentation	
Injury/Illness – First Aid				
Injury/Illness – Serious medical aid	Alberta WCB	Immediately 72 hours	Incident Report WCB Employers Report of Injury	
Injury/Illness – Loss time incident	Alberta WCB	Immediately 72 hours	Incident Report WCB Employers Report of Injury	
Injury/Illness – Fatality	Ministry of Labour & Immigration, Occupational Health and Safety Dept Alberta WCB	Immediately 72 hours	Incident Report WCB Employers Report of Injury	
Explosion, fire or flood or crane/ derrick/hoist upset or collapse or building or structure failure or collapse	Alberta OHS	Immediately	Incident Report	
Incidents with potential to cause serious injury (near misses)	Alberta OHS	Immediately	Incident Report https://psi.labour.alberta.ca	

Contact Phone Numbers

- Alberta Occupational Health Services: 1-866-415-8690 (<u>https://www.alberta.ca/occupational-health-safety.aspx</u>)
- Alberta Workers' Compensation Board: 1-866-922-9221 (<u>https://www.wcb.ab.ca</u>)

Investigation Requirements

Management of Minor and Serious Reportable Incidents				
Incident	Rating	Investigator		
Minor Near Misses	Low Risk Ranking using the Risk Matrix			
Major Near Misses	Medium to High Risk Ranking using the Risk Matrix			
Minor Injury	First Aid			
Major Injury	Medical Treatment Case, Restricted Duty Case, Lost Time Case or Fatality including all injuries reportable to WCB			
Non Recordable Motor Vehicle Accident	Under \$2,000 in damage			
Recordable Motor Vehicle Accident	Over \$2,000 in damage			
Non Recordable Equipment Damage	Under \$5,000 in damage			
Recordable Equipment Damage	Over \$5,000 in damage			
Non Recordable Property Damage	Under \$10,000 in damage			
Recordable Property Damage	Over \$10,000 in damage			
Non Recordable Spills	Less than 200L			
Recordable Spills	More than 200L and/or Reportable to applicable Environmental government agency			

Training

Members of the incident investigation team shall be qualified and competent individuals. Maximum Mechanical Services will provide training on the investigation techniques used during an incident investigation. Training may be performed in-house or by a third-party

Investigation Kit

Designated personnel conducting an investigation will have an investigation kit that includes:

- Incident Investigation Report
- Employee Incident Report
- Witness Statement
- Writing pad, pencil, pen and eraser
- Coloured ribbon to cordon off the scene
- Digital camera

- A fifty-foot (50ft.) measuring tape
- Sample containers for collecting evidence

Documentation

A record of every acute illness or injury, as well as any other incident that occurs at the worksite, is to be documented as soon as reasonably practicable after the incident is reported to Maximum Mechanical Services.

Investigation reports will include:

- Name of the employee
- Name and qualifications of the First Aider, as required
- Description of the incident
- Date and time the incident was reported
- Where the incident occurred on the worksite
- Unsafe conditions or hazards
- Related procedures
- Related hazard assessments
- Related training
- Related competency assessment
- Related preventative maintenance documentation
- Work-related causes of the incident
- Corrective actions

First aid, medical aid and lost time incidents will be classified and reported as per CAPP (Canadian Association of Petroleum Producers) Guide "Reporting of Occupational Injuries."

Maximum Mechanical Services will retain the records for three years internally from the date the incident is recorded.

Note: The CAPP Guide is well-recognized and used within Alberta across industries including and beyond oil and gas. (<u>https://www.capp.ca</u>)

	Action/Process	Employees	Supervision	JHSC Member / HSE Representative	Middle Management	Senior Management
1.	Report all incidents.	\checkmark	✓	\checkmark	\checkmark	\checkmark
2.	Arrange for transport of injured party to hospital, on-site medical or nursing unit.		✓		\checkmark	
3.	Investigate and determine root cause of incident.	\checkmark	\checkmark	\checkmark	\checkmark	
4.	Take control of the scene.		\checkmark	\checkmark	\checkmark	
5.	Report to external organization (i.e., OH&S, RCMP, WCB) if applicable.		\checkmark	\checkmark	\checkmark	
6.	Assist injured person if qualified and if safe to do so.	\checkmark	✓	\checkmark	\checkmark	
7.	Secure the scene.	\checkmark	\checkmark	\checkmark	\checkmark	
8.	Follow reporting protocol and report to Supervisor.	\checkmark	\checkmark		\checkmark	
9.	Finalize and distribute report.		\checkmark	\checkmark	\checkmark	
10.	Send report to client, if applicable.				\checkmark	
11.	Senior Management reviews and provides feedback.					\checkmark
12.	Forward lessons learned.		\checkmark	\checkmark	\checkmark	
13.	Meet external reporting requirement (i.e., WCB).	\checkmark	\checkmark	\checkmark	\checkmark	
14.	Communicate with media (if applicable).					\checkmark
15.	Communicate with employee's family (if applicable).					\checkmark

Investigation Procedure

Steps to conduct the investigation are as follows:

- 1. Take control of the scene. Anyone involve with the incident are to not disturb the scene of an incident unless otherwise directed by the proper authorities or under the following circumstances:
 - To attend to persons injured.
 - To prevent further injuries or death.
 - To protect property that is compromised as a result of the incident.
- 2. Keep the scene untouched except for rescuing or providing aid to an injured person. Where possible and practical, collect and safeguard any physical evidence.
- 3. Health and Safety Manager is to notify police/RCMP and applicable governing bodies.
- 4. Begin the investigation, utilizing the industry-recognized investigation tools and practices.
- 5. Take photographs of the scene.
- 6. Interview people involved and obtained written statements where appropriate.
- 7. Analyze and gather related documentation to determine the root cause. Look for where the management system failed.
- 8. Determine corrective actions to prevent reoccurrence. The written incident investigation report shall include any immediate corrective actions that were taken as well as any long-term actions that are required to prevent the recurrence of the incident.
- 9. Complete the investigation report. The written incident investigation report shall include an explanation of the contributing factors or root causes of the incident that were identified during the investigation.
- 10. Communicate the finding of the investigation (i.e., Safety Alert/Bulletin, stand-down or through Toolbox/tailgate meeting).



Notification of Family Members

In the event of a minor incident, the injured employee will have an opportunity to telephone family members before being taken for medical treatment. If a major injury or death were to occur, Maximum Mechanical Services Senior management will communicate directly with the family.

Company and Government Notification

Maximum Mechanical Services or designated management will notify occupational authorities and any governing agencies, as required by legislation. Delays in reporting may result in penalties against Maximum Mechanical Services.

Media Relations

If an employee is approached by the media for information, the employee will be courteous and explain that information will be provided by Maximum Mechanical Services or an appointed spokesperson. The employee will not offer personal comments or opinions.

Section 7 – Personal Protective Equipment (PPE)

Purpose

The purpose of this program is to provide information to all employees of Maximum Mechanical Services on the selection, use and care of PPE that will comply with requirements of the hazard assessment and control process and applicable legislation to determine the personal protective equipment to be used when completing certain task.^{1,2}

Definitions

Personal Protective Equipment (PPE) – Protective clothing or equipment worn by employees to protect against health and safety hazards.

Respiratory Protective Equipment – Equipment is used to protect the individual wearer against the inhalation of hazardous substances in the workplace air.

Flame Retardant Clothing – Clothing that has been treated with chemicals that reduces flammability of fuels or delays their combustion.

Dual Hearing Protection – Simultaneous use of approved ear plugs and ear muffs when an individual is exposed to noise hazards equal to or over 105 dBA.

Roles and Responsibilities

Senior Management

Senior management's responsibilities concerning the PPE Program include, but are not limited to the following:

- Ensure an effective process is in place for the training of all employees on the selection, use, maintenance and care of PPE.
- Ensure resources are available for the provision of specialized PPE as well as any PPE required for emergency response.
- Ensure any PPE provided by Maximum Mechanical Services as per legislated employer responsibilities meets all legislative and regulatory requirements³ (i.e., hearing protection and respiratory protective equipment).

¹ Alberta Occupational Health and Safety Regulations, Part 1 - Section 13 (3)

² Alberta Occupational Health and Safety Code, Part 29 - Workplace Hazardous Materials Information System (WHIMIS), Section 407

³ Alberta Occupational Health and Safety Code, Part 18 - Personal Protective Equipment, Section 228 (1)

Middle Management

Middle management's responsibilities within the Incident Management Program include, but are not limited to the following:

- Support the program by ensuring the required specialized PPE is available based on an assessment of the hazards.
- Inform employees of the necessity for PPE and clothing as well as their responsibility for its proper selection, use, care, maintenance, and handling.

Supervision

Supervision's responsibilities within the PPE Program include, but are not limited to the following:

- Verify through inspection that employees are performing a pre-use inspection of PPE.
- Verify through inspection that PPE is maintained and stored according to manufacturer specifications.
- Ensure employees utilize appropriate PPE for the task based on the hazard assessment and applicable legislative requirements.⁴
- Only allow PPE on the worksite that is compliant to applicable legislation and standards and is in a condition to perform the function for which it was designed.⁵
- Only allow repair to manufacturer's specification of PPE to be performed by an approved vendor or competent employee.

Employee

Employee's responsibilities within the PPE Program include, but are not limited to:

- Use PPE as per the hazard assessment, SDS, and applicable legislation and standards.
- Maintain and store equipment according to manufacturer specifications.
- Inspect all equipment before use.
- Remove from service PPE determined through the inspection process to have defects.
- Report all defective specialized PPE to supervision.

General PPE Guidelines

Where possible, worksite hazards will be substituted, eliminated or controlled through the use of engineering or administrative controls, such as job planning, proper selection of employees, to having employees follow safe work practices and procedures. Where hazards remain, the last line of defense will be the use of the specified PPE.

⁴ Alberta Occupational Health and Safety Code, Part 18 - Personal Protective Equipment, Section 228 (1)

⁵ Alberta Occupational Health and Safety Code, Part 18 - Personal Protective Equipment, Section 228 (2)

Employees are required to assess the hazards encountered when selecting the appropriate level of protection or combination thereof. When handling hazardous material, employees will reference the Safety Data Sheets (SDS) to establish the required level of protection.⁶

Employees will not use PPE that is not in a safe condition to perform the function for which it was designed. If the PPE selected causes additional hazards that could potentially endanger an employee, the employee will inform their supervisor who will reassess the situation via the hazard assessment process. The supervisor is then responsible to provide alternate controls to mitigate the hazards identified.

PPE Training Requirements

Supervision will provide instruction to employees on the selection, use, care maintenance and limitations of PPE that will be appropriate to the hazards on the worksite and to follow the manufacturer's specifications.

Maximum Mechanical Services will provide employees with the required Workplace Hazardous Materials Information System (WHMIS 2015) training so that hazards and controls for various substances can be recognized. Maximum Mechanical Services will inform employees of harmful substances in their work areas that may injure the skin on contact or may affect the employee health if absorbed through the skin, inhaled or ingested. PPE will be provided to protect against such incidents.⁷

General PPE Requirements

Protective Headwear

When there is a danger of injury to a worker's head at a worksite and there is a possibility of lateral impact to the head, personnel will wear protective headwear meeting CSA Standards. Protective hard hats are designed to protect the employee's heads from impact and penetration by falling or moving objects, flying particles or from high voltage electrical shock burns. Hard hats used by Maximum Mechanical Services personnel on worksites will meet *CSA Standard Z94.1-05, Industrial Protective Headwear*.

The following requirements apply to the worksite:

- Wear hard hat liners or other apparel suitable to protect the neck and head from cold temperatures when conditions warrant. Install winter liners and maintain them according to manufacturer's specifications.
- Maintain the hard hat in accordance with manufacturer's specifications, periodically check the hard hat shell and suspension for any signs of visible damage:
 - Replace the hard hat after five (5) years.

⁶ Alberta Occupational Health and Safety Code, Part 18 - Personal Protective Equipment

⁷ Alberta Occupational Health and Safety Code, Part 29 - Workplace Hazardous Materials Information System (WHIMIS), Section 397 - Training

- Replace the suspension assembly, as required or after a significant impact.
- Replace any defective parts before using the hard hat.
- Clean headwear using a mild detergent and rinse thoroughly in clean hot water.
- Do not store headwear in direct sunlight.
- Do not alter hard hats in any way such as drilling holes for air circulation or painting them for decorative purposes as this could affect their protective value.
- Never wear metal hard hats at any time; these are prohibited for safety reasons.
- Do not reverse the hard hat shell from the liner or wear backwards unless designed for that purpose by manufacturer. Only wear as intended.



Eye and Face Protection

Employees must use CSA-approved safety glasses with fixed side shields at all times when the hazard assessment conducted identifies a workers eye may be injured or irritated at the worksite. Maximum Mechanical Services will provide basic and specialized face and eye protection to employees, as required. Eye protection is designed to protect personnel from hazards such as:

- Flying objects and particles (physical)
- Molten metals
- Splashing liquids (chemical)
- Ultraviolet, infrared and visible radiation (welding)



Exposure to potential eye and face injury can be reduced by wearing proper protective face and eyewear. Employees will use eye and face protective equipment when operating machines or carrying out other tasks that present potential eye or face injury from physical, chemical or radiation agents. Full face shields, goggles or other types of eye protection will be worn when safety glasses with side shields are inadequate to protect against hazards. Goggles, face shields and similar equipment will be of an approved design and construction in accordance with:

- Approved to CSA Standard Z94.3-07, Eye and Face Protectors,
- Approved to CSA Standard Z94.3-99, Industrial Eye and Face Protectors, and
- Appropriate for the work being done and hazards involved.

Full face shields, goggles or other types of eye protection will be worn when safety glasses with side shields are inadequate to protect against hazards.

If appropriate to the hazards on the worksite, prescription eyeglasses will be CSA-approved safety glasses with rigid side shields. Non CSA-approved prescription eyeglasses can be worn under approved safety glasses or mono-goggles.

Employees are required to maintain and store face and non-prescription eyewear as per manufacturer's specifications.

Hearing Protection

A noise management program is required at worksites where employees are exposed to excessive noise. The program will include policies and procedures that address noise exposure to personnel. The program should provide training on selection of noise or hearing protection, monitoring devices for the worksite where excessive noise is present, warning signs, and audiometric hearing tests for personnel exposed to excessive noise in the workplace.

Certain operations and tasks have been identified as areas and activities that require the use of hearing protection. Noise signage will be posted in these areas and hearing protection will be provided, as required. High noise work areas and activities will have appropriate controls in place to reduce noise.

Employees must not be exposed to noise levels which exceed 85 dBA, however, if it is not reasonably practicable to decrease the noise or isolate persons from the noise, personnel will wear approved hearing protection that meets *CSA Standard Z94.2-02 Hearing Protection Devices* – Performance, Selection, Care and Use. All personnel are to abide by the limits as set forth in the Occupational Exposure Limits for Noise, under Schedule 3, Table 1 or 85 dBA (reproduced below) in the *Alberta Occupational Health and Safety Code*. Earplugs may also be required on client sites as directed by client.

Exposure Level (dBA)	Exposure Duration		
82	16 hours		
83	12 hours and 41 minutes		
84	10 hours and 4 minutes		
85	8 hours		
88	4 hours		
91	2 hours		
94	1 hour		
97	30 minutes		
100	15 minutes		
103	8 minutes		
106	4 minutes		
109	2 minutes		
112	56 seconds		
115 and greater	0		

Schedule 3 – Table 1 - Occupational Exposure Limits for Noise

Note: Exposure levels and exposure durations are to be pro-rated if not specified

Adequate hearing protection will be of the appropriate class and grade as identified in the Selection of Hearing Protection Devices Schedule 3, Table 2 (reproduced below) in the *Alberta Occupational Health and Safety Code*.

Maximum Equivalent Noise Level (dBA Lex)	CSA Class of Hearing Protection	CSA Grade of Hearing Protection
<90	C, B or A	1, 2, 3 or 4
<95	B or A	2, 3, or 4
<100	А	3 or 4
<105	А	4
<110	A earplug + A or B earmuff	3 or 4 earplug + 2, 3 or 4 earmuff
>110	A earplug + A or B earmuff and limited exposure time to keep sound from reaching the employee's eardrum below 85 dBA	3 or 4 earplug + 2, 3 or 4 earmuff and limited exposure time to keep sound from reaching the employee's eardrum below 85 dBA

Schedule 3 – Table 2 - Selection of Hearing Protection Devices

Lex: Is the worker's level of total exposure to noise in dBA, averaged over the entire work day and adjusted to an equivalent 8-hour exposure (based on a 3 dB exchange rate). In other words, a worker exposed to 88 dBA for 4 hours or 91 dBA for 2 hours would be exposed to 85 dBA Lex (an exposure equivalent of 85 dBA for 8 hours). https://open.alberta.ca/dataset/543371ee-013b-4a94-9a34-52fae25774be/resource/3f38702a-7730-4161-8b59-1f94c6a15779/download/whs-pub-hs003.pdf Dual hearing protection will be provided for continuous exposure to excessive noise levels, such as constant running machinery in an enclosed space. For extended exposure to noise that requires additional hearing protection, employees will be given ear muffs (if applicable, can be ear muffs that attach to the hard hat).



Noise Management Assessment

Maximum Mechanical Services will annually assess the effectiveness of the noise management program to determine the following:

- If the program adequately addresses education of personnel who are exposed to excessive noise in the workplace.
- The effectiveness of control measures in place to reduce personnel exposure to noise.

A noise survey is conducted to identify high noise areas. The exposure of an employee to sound will be measured using an instrument that:

- is recommended for that measurement in *clause 4.3 of CSA Standard CAN/CSA-Z107.56-06, Procedures for the Measurement of Occupational Noise Exposure,* as amended from time to time; and
- meet the requirements for such instrument

Audiometric Testing

Management will arrange for the necessary instruments and personnel to complete noise level assessments if employees are or may be exposed to noise in excess of 85 dBA. Audiometric testing and maintenance of test records will be done in accordance with applicable legislation. The person conducting the test(s) will further advise management on the options for noise suppression or protection if exposure exceeds acceptable levels.

Maximum Mechanical Services will provide the following audiometric tests for employees exposed to excessive noise as per *Alberta Occupational Health and Safety Code*, Part 16 subsection 223(1):

- An initial baseline test as soon as practicable, but no later than six months after the employee is employed, or with in six months after work has been exposed to excessive noise because of a change in the employees duties or process conditions.
- Not more than 12 months after the initial baseline test.
- At least every second year after the test.

Hearing Protection Training

Maximum Mechanical Services will ensure supervision receives training on the following:

- Selection, use and maintenance of hearing protection devices to be worn in accordance with manufacturer's specifications.
- The risks of hearing loss with exposure to excess noise.
- The correct use of control measures and hearing protection.
- Identification of suitable locations for posting temporary warning signs as required in work areas where the noise level exceeds 85 dBA.
- Methods of noise control to be used.

Hand and Body Protection

All employees must wear appropriate skin, hand, foot or body protection if he/she is exposed to a substance or condition which is likely to puncture, abrade or otherwise adversely affect the skin, or be absorbed through it.

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

If a glove, apron, or other protective equipment used to protect the skin against contact with a hazardous substance is rendered ineffective due to contamination with the substance; the protective equipment must be promptly replaced with clean or decontaminated equipment to maintain the required protection.

Choosing protective gloves and body protection that adequately protects from the hazard(s) of a specific job and adequately meets the specific tasks involved in the job, can be done using the following chart:

Hazard	Type of Protective Material
Abrasion	Reinforced heavy rubber, staple-reinforced heavy leather, rubber, plastic,leather, polyester, nylon, cotton
Sharp Edges	Metal mesh, staple-reinforced heavy leather, Kevlar, aramid-steel mesh,leather, terry cloth (aramid fiber), polyester, nylon, cotton
Chemicals and Fluids	Depending on chemical: natural rubber, neoprene, nitrile rubber, butyl rubber, Teflon, polyetrafluoroethylene
Cold	Leather, insulated plastic or rubber, wool, cotton
Electricity	Rubber-insulated gloves tested to appropriate voltage (CSA standardZ259.4-M1979) with leat her outer glove
Heat	Asbestos, neoprene-coated asbestos, heat-resistant leather with lining
General Duty	Cotton, terry cloth, leather
Product Contamination	Thin-film plastic, lightweight leather, cotton, polyester, nylon
Radiation	Lead-lined rubber, plastic or leather

Hand Protection

Based on the hazard assessment completed, employees will wear work gloves to protect against cuts, burns, chemicals and exposure to elements. This section will work in conjunction with the guidelines outlined in the safe work practices.

The hand protection required will be dependent on the task and type of hazards the employees will be exposed to. This will be determined via the hazard assessment control process. The following are examples of work tasks and the corresponding recommended hand protection to be used:



- Light work or general duties use cotton or canvas gloves.
- Handling rough or abrasive material use leather or leather-faced gloves.
- Handling chemicals or corrosive materials use plastic or plastic coated gloves made from neoprene or nitrile.
- Exposure to elements use insulated and weather resistant gloves.
- Electrical work use specifically made and approved rubber gloves which adhere to Occupational Safety Health Administration (OSHA) standard 29 CFR1910.137.

Protective Footwear

Footwear must be appropriate for the tasks being completed. If the hazard assessment identifies the need that a worker requires protective footwear to protect from worksite hazards, footwear must meet CSA Standard *Z195-02 Protective Footwear* to provide adequate foot protection and to comply with legislative requirements. Footwear meeting the CSA Grade I requirements is identified by a green triangle on the outer side of the boot or on the tongue of the right boot. Footwear will be high-cut (minimum 6 inch in height) to be effective in providing adequate ankle support and protection. This section will work in conjunction with the guidelines outlined in the Safe Work Practices.

All safety footwear will:

- be appropriate to the work condition, terrain and climatic conditions.
- be in good condition.
- have adequate tread.
- be high-cut and worn with laces tied.



Effective Date: Revision Date: Revision No.:

MMS-HSE-MS-V.5 - September 7, 2022

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Hi-Vis Clothing

Hi-Vis clothing must be appropriate for the task being completed. This selection will work in conjunction with the guidelines outlined in the safe work practice and/or applicable legislation. All Hi-Vis clothing will:

- be selected based upon hazard identification (i.e., flagging on busy roadways vs. stripes while working around equipment.
- be appropriate to the work conditions, terrain and climate conditions.
- be clean and well maintained. Dirty or worn clothing compromise the level of visibility.



Protective Clothing

Protective clothing will suit working conditions and provide protection from any hazards identified via the hazard assessment process. Maximum Mechanical Services will require that employees follow the protective clothing requirements below:

- · Protective clothing will cover arms and legs completely.
- · Loose fitting clothing is prohibited near moving or rotating equipment.
- Protective clothing is to be kept clean and in good condition according to manufacturer specifications.

Flame Resistant Clothing (Client Specific)

When working in areas where the risks of a fire, flash-fire, flash-over or explosion exists, employees will wear flame retardant clothing. The following information defines the hazard levels to which this program applies and the specific required flame retardant work wear.

Level I Hazard

- 1. An operation where personnel are directly involved in normal maintenance activities at existing facilities or operations.
- 2. Level I Requirements of Flame Retardant Clothing:
 - Any employee who may be exposed to a Level I hazard will wear outer clothing made of 100% cotton. Any additional clothing sublayers will consist of at least 50% cotton blends. Blends of less than 35% cotton are strictly prohibited.



Level II Hazard

- 1. An operation where a potential fire and explosion hazard exists.
- 2. Level II Requirements of Flame Retardant Clothing:
 - Any employee who may be exposed to a Level II hazard will wear flame retardant outer clothing (Nomex II or equivalent). The company will supply Level II flame retardant clothing to employees and will be returned upon completion of work.

Respiratory Protection

Employees will wear approved respiratory protection when required by the hazard assessment to protect against dangerous gases, fumes, chemical vapours, particulates, and dust. Employees wearing respiratory protection will have training specific to the equipment and possess a valid fit test certificate specific to the respiratory equipment required to be worn. Potential users of this equipment will read and comply with the appropriate manufacturer's specifications for the specific brand name and type of equipment used.

Employees will wear particulate filtering respirators supplied by Maximum Mechanical Services when exposed to airborne particles. Employees wearing respiratory protection will have training specific to the equipment. Potential users of the equipment will read and comply with the appropriate manufacturer's specifications for the specific brand name and type of equipment used.

Fall Protection Equipment

A hazard assessment will be conducted to determine if fall protection is necessary and/or type to be used to protect an employee from a potential fall. All components of a personal fall arresting system (harness, lanyard, shock absorber) and the connecting components (carabiners, d-rings, oval rings, selflocking connectors and snap hooks) will meet approved CSA or ANSI Standards.

To be able to wear fall protection equipment, the user must possess a valid fall protection certificate.



Refer to Fall Protection Code of Practice.

Section 8 – Safety Orientation, Training and Communication

Purpose

The purpose of the Safety Orientation, Training and Communication Program is to ensure employees have received the necessary training and orientations to perform their jobs safely.^{1, 2,}

Definition

Competent – Employee is adequately qualified, suitably trained, and either has sufficient experience to work safely without supervision or with only minimal supervision.

- Adequately qualified The employee has qualifications, usually earned through a formal education program, training course, etc., or a combination of education and practical experience.
- **Suitably trained** The employee has training that is appropriate to the tasks performed, equipment used, etc.
- **Sufficient experience** The employee will safely perform work without supervision or with a minimal degree of supervision. Determining whether an employee has sufficient knowledge and experience to safely perform work is the employer's responsibility.

Roles and Responsibilities

Senior Management

Senior management's responsibilities within the Safety Orientation, Training and Communication Program include, but are not limited to the following:

- Ensure an effective process is in place so all employees are competent to perform their assigned jobs.
- Attend an on-site toolbox/tailgate meeting at least annually.
- Attend monthly office safety meeting.
- Determine the minimum qualifications required to perform each role within the company.
- Ensure an effective process is in place so all employees, including subcontractors, visitors and selfemployed person receive a general safety orientation and as required, a client specific orientation.
- Ensure a process is in place for a training matrix to be developed, maintained, and used as a tool to monitor current ongoing training needs and forecast training requirements corresponding to any operational changes.

¹ Alberta Occupational Health and Safety Act, Part 1 - Obligation of Employers, Section 3

² Alberta Occupational Health and Safety Regulations, Part 1 - General, Section (13)(3)(15)

Middle Management

Middle management's responsibilities within the Safety Orientation, Training and Communication Program include, but are not limited to the following:

- · Coordinate the safety meeting process to ensure the minimum frequency of meetings is being met.
- Hold periodic supervision meetings to review health and safety activities including incident trends and health and safety opportunities for improvement.
- Determine the minimum competency assessments required to operate different tools and equipment.
- Determine the minimum training requirements by job title.
- Ensure an effective process is in place so all employees, including subcontractors, visitors and selfemployed persons receive a general safety orientation.
- Ensure implementation and maintenance of a training matrix, and be used as a tool to monitor current ongoing training needs and forecast training requirements to any operational changes.
- Coordinate company communication by ensuring newsletters and safety bulletins are effectively utilized to communicate safety information and concerns.
- Designate qualified and competent personnel to supervise tasks that could endanger employees.

Supervision

Supervision's responsibilities within Safety Orientation, Training and Communication Program include, but are not limited to the following:

- Assign a competent assessor to complete the required competency assessments on employee's ability to operate tools or equipment.
- Lead safety meeting agenda to ensure that the safety meeting is an effective tool to lead, direct and instruct employees.
- Ensure the process in place is followed so all employees, management, including subcontractors, visitors and self-employed persons receive a general safety orientation and as required, a client specific orientation.
- Use the training matrix to plan employee tasks and forecast training requirements corresponding to any operational changes.

Employee

Employee's responsibilities within the Safety Orientation, Training and Communication include, but are not limited to the following:

• Participate in Safety meetings to create a healthy two-way communication of safety related topics and concerns.

- Only operate tools and equipment that one is qualified to operate.
- Attend mandatory general safety orientation and client specific orientation as required.
- Meet training requirements necessary to perform tasks.
- Provide a copy of current and relevant certifications to Maximum Mechanical Services to place on file and be inputted into the training matrix.

Subcontractors

Subcontractors responsibilities within the Safety Orientation, Training and Communication include, but are not limited to the following:

- Attend mandatory general safety orientation and client specific orientation as required. Participate in safety meetings to create a healthy two-way communication of safety related topics and concerns.
- Only operate tools and equipment that one is qualified to operate.
- Meet training requirements necessary to perform tasks.
- Submit required safety documentation as requested by Maximum Mechanical Services.

Management/Supervisor Orientation

Persons hired for the role of management or supervision will receive an orientation covering the following topics:

- Detailed review of Maximum Mechanical Services HSE-MS.
- Workplace Hazardous Materials Information System (WHMIS 2015) Training.
- Review of emergency response procedures.
- Detailed review of applicable codes of practice, safety work practices and safe job procedures.

General Safety Orientation

The designated Maximum Mechanical Services trainer will conduct the general safety orientation with all new/ transferred employees on or before their first day of work, prior to starting work. The designated trainer will confirm that the new employees including all sub-contractors and self-employed persons have the required qualifications, tickets, and certification prior to conducting the general safety orientation. A key component of the orientation includes notifying the employees with their obligation to "Refuse Dangerous Work". Additional information covered in the general safety orientation includes a review of legislation, company rules, safe work practices and procedures that are applicable to the employee. The orientation can be in the form of a verbal and/or media presentation or any combination of the two. Upon completion of the general safety orientation, the employee will complete and sign the Safety Orientation Checklist and return it to the designated personnel.

New employees must supply copies of all required certificates to Maximum Mechanical Services for their records.

The general safety orientation will address the following safety topics:

Company Policies

- Health and Safety Policy
- Workplace Violence and Harassment Policy
- Discipline Policy
- Alcohol and Drug Policy

Company Programs

- Hazard Assessment and Control
- Emergency Preparedness
- Incident Management:
 - Near miss reporting
 - Incident/accident reporting
- Personal Protective Equipment
- Safety Orientation, Training and Communication
- Mentorship
- Inspection
- Fatigue Management
- Disability Management
- Workplace Violence and Harassment
- Transportation
- Working Alone

Visitor/Contractor Orientation

All visitors to Maximum Mechanical Services sites are to receive a visitors orientation which will cover all of the following information:

- Visitor health and safety roles and responsibilities
- Location of emergency equipment (first aid kits, fire extinguishers, etc.)

Page 4 of 10

MMS-HSE-MS-V.5 - September 7, 2022

Effective Date: Revision Date: Revision No.:

- Site Specific Training
 - Site Specific Emergency Response Plan
 - Location of Emergency Equipment (First Aid Kits, Fire Extinguishers, etc.)
 - Safety Data Sheets (SDS)
 - Location of reference material (i.e., OHS booklets, Safety Manual)

Additional HSE-MS Topics

- Company Safety Rules
- Employee Responsibilities:
 - Right to know
 - Right to participate
 - Right to refuse
- WHMIS 2015 Training
- Relevant Safe Work Practices
- Relevant Safe Job Procedures
- Relevant Codes of Practice
- Relevant Job Hazard Assessments

- Emergency response plans and procedures
- Required PPE

Communication

The following types of meetings are utilized to communicate HSE hazards, goals and objectives at the prescribed frequencies below:

- Toolbox/tailgate meetings
- Safety meetings

Toolbox/Tailgate Meetings

Toolbox/tailgate meetings are used to provide current information on safety issues related to on-site project/ facility activities. General topics may include:

- Designated First Aiders to meet the requirements of occupational health and safety legislation.
- Review of hazards on the job site including associated controls.
- Review of emergency response plan including:
 - transportation of injured employee
 - muster points
 - evacuation routes
 - alarm system
- Prior day safety concerns.
- Job scope and plan for the current day, including identifying potential hazards.
- Manpower, equipment and tools required for the work plan.
- Near misses and incidents.
- Behavioral Based Observations (BBOs).
- PPE based on an assessment of the hazards.
- Designated smoking areas.
- Parking policy.
- Permits (if applicable).

Toolbox/tailgate meetings are to be held, documented and signed off by all employees as per site specific requirements of the shift.

Safety Meetings

Safety meetings are a key part of the Maximum Mechanical Services HSE-MS program. Safety meetings are to be in a formal setting, conducted by supervision each month. Meetings are to be planned and announced in advance in order to include all employees.

Each meeting will differ in terms of emphasis and topics; however, the following should typically be covered at each meeting:

- **Attendance** The names of those attending the meeting will be recorded in the minutes of each meeting.
- **Review** Minutes/action items (work to be done; solutions found) from the last meeting will be reviewed.
- **Discussions** Open discussion about matters or issues relating to health and safety.
 - Information about health and safety issues relevant to the workplace.
 - Reports from workplace safety inspections and from investigations of any work-related, timelost injuries, including suggested corrective measures.
 - Review of safety statistics.
 - Review of new laws or industry standards.
 - Review of new company policies and procedures.
 - The identification and discussion of any safe or unsafe act, procedure, equipment or person that anyone has noticed. Corrective actions to be assigned, if required.
 - Training issues identified.
 - Future events in the industry that may impact specific work procedures.
 - Issues employees would like discussed.
- Feedback Safety concerns from employees, inspectors, clients, etc.
- **Presentation** Guest speaker, video or presentation by Management or an employee on a topic related to health and safety (i.e., lifting, defensive driving, etc.). Such presentation/topics may be related to something on the job or off the job.

All discussions and action items shall be clearly recorded. If corrective actions are required, they will be given a due date, priority and person responsible, and put on the action list. Minutes must be easily readable and distributed within a reasonable time following the meeting and posted for employee review.

Safety Training

Senior Management

Minimum required training for Senior Management includes, but is not limited to, the following:

- Investigation training
- · Regulations and legislated requirements
- Supervisor/leadership training
- Inspections training
- Workplace violence and harassment training
- Workplace hazardous material information system (WHMIS 2015)

Middle Management

Minimum required training for middle management includes, but is not limited to, the following:

- Investigation training
- Regulations and legislated requirements
- Supervisor/leadership training
- Inspections training
- Workplace violence and harassment training
- Workplace hazardous material information system (WHMIS 2015)

Supervision

Minimum required training for supervision includes, but is not limited to, the following:

- Job responsibilities
- Investigation training
- Regulations and legislated requirements
- Supervisor/leadership training
- Inspection training
- Workplace violence and harassment training
- Workplace hazardous material information system (WHMIS 2015)
- Transportation of dangerous goods (TDG)

Employee

Minimum required training for employees includes, but is not limited to, the following:

• Job responsibilities

- · Regulations and legislated requirements relating to duties and responsibilities
- Workplace violence and harassment training
- Workplace hazardous material information system (WHMIS 2015)
- Transportation of dangerous goods (TDG)

Job Specific Training

Job specific training will be provided for new or transferred employees. All employees must be trained on the tasks they perform on a regular basis and as required. Training may be performed in-house or by a third-party. All training tickets/certifications must be kept current if it is necessary to the specific tasks being performed. A training matrix needs to be developed, maintained, and have the ability to flag employee training tickets that will expire within six (6) months. This will give adequate time to alert the supervisor and employee to plan ahead to schedule the refresher courses required before they expire and to plan for training requirements when operational changes occur. Scheduling training courses in advance will have less of an impact on workforce planning.

Further safety training will be provided based on the scope of the work and hazards identified. Examples of additional training may include the following:

- Asbestos awareness
- Benzene awareness
- Confined space entry
- Construction safety training system (CSTS)
- H₂S Alive
- Fall protection
- Fire extinguisher

- Hours of service
- Ground disturbance level II
- Logbook training
- Overhead power line awareness
- Standard first aid
- Wildlife awareness

Competency and On-the-Job Training

Maximum Mechanical Services has established a procedure to ensure that documentation is acquired from employees as proof that they are qualified to perform their job duties.^{3, 4,}

An employee that is new to the job or a particular task will work under the supervisor of an individual (competent trainer) who has been deemed competent in that job/task. Training is to be continued until the employee is deemed competent. (i.e., employees are not allowed to operate equipment unless they are competent in the operation of that equipment). On-the-job training will be documented and filed.

An established organizational chart will be provided listing all positions and each role. Minimum qualifications for each role will be made clear.

³ Alberta Occupational Health and Safety Act, Part 1 - Obligation of Employers, Section 3 (2);

⁴ Alberta Occupational Health and Safety Regulations, Part 1 - Section 13 - General Protection of Workers (13)

To assist with introducing employees to new job tasks, employees will receive training through the mentorship program or on-the-job training to verify competency. If employees have any concerns with performing a task for which they are not confident to perform, they have a responsibility to contact their supervisor before starting the task. Work that may pose a danger to the employee is to be completed by another employee who is more competent in that particular task. A competent person (trainer/mentor) will verify that an employee is competent to perform their roles and responsibilities before being allowed to work independently. The employee will continue to apply the knowledge and skills acquired through training to job specific tasks.

Step 1 – Introduction

The competent trainer will explain:

- What task/skill is to be learned
- How it will be instructed
- How the task/skill will be evaluated (tested)
- Why the employee needs this skill
- And where it fits into the employee's job

Step 2 – Perfect Demonstration

The competent trainer will demonstrate the entire task, explaining each step as it is performed. Depending on the complexity of the task, it may be valuable to demonstrate the task more than once. For instance, replacing a toner cartridge on the average laser printer is probably a task that could be demonstrated and explained once. However, a task like training an employee how to lift a pallet using a lift truck may require several demonstrations.

Step 3 – Practice with Close Supervision

The competent trainer will guide the employee through each individual step in the task carefully explaining each step along with an explanation of why each step is important. Depending on the complexity of the task and the employee's prior knowledge, this Step 3 may be repeated several times.

Step 4 – Practice with Moderate Supervision

The employee has been guided through the task to the point where they are able to attempt it without direct supervision. At this point, the employee should be asked to explain to the competent trainer what each step in the task and why it is important. It is important that there be no deviation from the 'perfect' demonstration skill level. The employee should continue with this level of supervision until the task can be done without error. At this point, the focus is on quality of performance, not speed.

Step 5 – Practice with Minimum Supervision

Once the competent trainer is comfortable that the employee knows HOW to do the task without error, the employee should be given the opportunity to practice the task to build up speed. At this point, there is an increasing focus on quantity of performance, but NEVER at the expense of quality or safety. This Step 5 should continue until the employee and the competent trainer are comfortable with moving to the final Step 6.

Step 6 – Evaluation

The employee has now been guided by the competent trainer step by step through each part of the task, has been given opportunities to demonstrate basic mastery of the task by doing the task and explaining each step to the competent trainer. The employee has also had a period of practice building up speed while maintaining perfect performance. At this point, a final assessment is indicated. The final assessment will have been explained in Step 1 so there is no surprise about what is expected.

Record Retention

Non expired training records including competency assessment and mentorship records are to be maintained and kept on file for the entire time the employee is employed with Maximum Mechanical Services. Information that is required on the training includes the following:

- Trainer(s),
- Training requirements,
- Completed training to date,
- Minutes of all Toolbox/Tailgate meetings and Safety meetings are to be recorded and kept on file for three (3) years.

Section 9 – New to the Workforce and Employee Mentoring Program

Purpose

This program helps to safely integrate and provide the required training to new employees before, and during, entry into the worksite. This program applies to all Maximum Mechanical Services' new employees.

Definitions

A New Employee is:

- New to the worksite; or on site for less than three (3) months.
- Working less than three (3) months in the company or in his/her current position.
- Returning to the worksite after being absent for a period of time and where the hazards in that worksite changed during that time.
- Affected by a change in the hazards of a worksite.
- Relocated to a new worksite where the hazards in the new worksite are different from the hazards at the employee's previous worksite.

Young Employee – means any employee who is under twenty-five (25) years of age.

Mentor – an individual who guides a less experienced person by building trust and modeling positive behaviours. An effective mentor understands that his or her role is to be dependable, engaged, authentic, and tuned into the needs of the mentee.

Supervisor – An individual who directly supervises a person or an activity.

Identification – New employees will be identified daily in the toolbox/tailgate meeting and will be visibly identified through the use of a different coloured hardhat or other method of identification. The method used to identify them should be communicated to the client.

Roles and Responsibilities

Senior Management

Senior management's responsibilities within the New to the Workforce and Employee Mentoring Program include, but are not limited to the following:

- Ensure a process is in place for the adoption and implementation of the New to the Workforce and Employee Mentoring Program.
- Ensure a process is in place for supervisors to be trained in the implement the program.
- Supply adequate resources to meet the requirements of this program.
- Protect the fair and consistent application of this program.

Middle Management

Middle management's responsibilities within the New to the Workforce and Employee Mentoring Program include, but are not limited to the following:

- Adapt, implement and apply all areas of this program.
- Confirm supervisors are trained in the implementation of this program.
- Protect the fair and consistent application of this program.

Supervision

Supervision's responsibilities within the Employee Mentorship Program include, but are not limited to the following:

- Assign a mentor to a new employee until mentor determines that the employee is sufficiently trained to work alone.
- Not assign a task to a new employee without supervision until a mentor determines that the employee is sufficiently trained to work alone.

Mentor

Mentor's responsibilities within the Employee Mentorship Program include, but are not limited to the following:

- Orientate all new employees and communicate the HSE-MS, safe work practices, safe job procedures, formal hazard assessments and codes of practice including any emergency procedures.
- Document the training provided to the new employee.
- Document the competency level of the new employee.
- Identify additional/supplemental training required.

New Employee

New employee's responsibilities within the Employee Mentorship Program include, but are not limited to the following:

• Not start a task without supervision overseeing his/her work until deemed competent to work alone.

Supervision of New Employees

For the duration of time that the new employee is on a Maximum Mechanical Services worksite, the supervisor is required to maintain surveillance or supervision of the new employee until the supervisor is satisfied that the new employee is competent in their tasks and is showing awareness of those hazards around them.

The supervisor/mentor will, as time permits, monitor the activities of the new employee so as to confirm they are performing the assigned tasks in a safe manner and in accordance with Maximum Mechanical Services' Safe Work Practices and Procedures for that site. A competent mentor may be assigned, in place of the supervisor, to work with the new employee and monitor their progress.

The supervisor is responsible for completing the new employee documentation and signing off that the employee is competent to work alone. Once it has been completed and the employee has been deemed competent, the supervisor is responsible for the removal of the new employee identifier.

The supervisor will provide the new employee with additional orientation and training if:

- worksite observation reveals that the new employee is not able to perform work tasks or work processes safely.
- it is requested by the mentor.
- it is requested by the new employee.
- supervisor will confirm that the owner or prime contractor of the worksite is aware and has been notified of the amount of new employees on-site, if requested by the owner or prime contractor.
- new employees will never work alone.
- new employees will never be more than 75% of the employees in a crew.

Subcontractors working for Maximum Mechanical Services that do not have a new employee program will fall under Maximum Mechanical Services's New Employee Program and be managed accordingly.

Mentor

Where possible, a mentor will be assigned to work with, or close to, the new employee. The employee will be informed that the mentor is their contact person if they have any safety questions or concerns about the work. The mentor should be competent with an in-depth experience of the tasks assigned to the new employee so as to be able to offer guidance and answer any questions. The mentor will see that the new employee follows the new employee program, provide the new employee with job skills, coaching and training. Training will be recorded and documented properly, and the mentor will provide feedback to the Supervisor on the new employees progress.

Employee Competency and Training

Employee competency and training is an essential part of reducing worksite injuries. Employees need to know how to do their jobs safely without risking their health and safety of others. New employees are at greater risk of injury due to their lack of familiarity with the hazards of the job task and the hazards of the worksite. The training of the employee and orientating the employee to the worksite is necessary to manage the risk of unfamiliarity. Training tests and competency assessments are an effective tool to assess new employee's retention of information.

New employees will receive training in accordance with Maximum Mechanical Services' policies and procedures. The employee will be required to demonstrate their competency while completing their tasks before they can work alone.¹

Record Retention

Documentation of the training and orientation provided to the new employee is required. The training records will be retained by Maximum Mechanical Services and shall be retained for the length of time the new employee is employed with Maximum Mechanical Services.

Records will be maintained with the following:

- Training, monitoring and corrective actions .
- Worksite observations that identify additional training requirements.
- Training suggested by the mentor.
- Training requested by the employee.

¹ Québec Commission des normes, de l'équité, de la santé et de la sécurité du travail Regulation respetion occupational health and safety Chapter S-2.1, r.13 Division Division II The Employer Section 2 General Obligations 51 (9)

Section 10 – Company Safety Rules

General

Safety rules and regulations are an integral component of Maximum Mechanical Services operations. When used effectively, these rules can contribute to the overall success of the Maximum Mechanical Services' Health, Safety, and Environment Management System (HSE-MS) and associated programs. Safety rules are developed internally and enable management to have a closer relationship with workers who provide valuable input, to the overall HSE-MS program.

Definitions

Rule – An authoritative, prescribed direction that governs and controls actions and activities.

Guideline – A general rule, principle, or piece of advice.

Regulation – An ordinance, a law or a directive set by an outside organization or agency, such as the government, for control of people, environment, property and materials.

Roles and Responsibilities

Senior Management

Senior management's responsibilities within the adherence to the Company Safety Rules include, but are not limited to the following:

- Ensure a process is in place for the adoption and implementation of the adherence to the company safety rules.
- Ensure a process is in place for supervisors to be trained in the implement the adherence to the company safety rules.
- Supply adequate resources to meet the requirements of the company safety rules (provide adequate equipment to address controls used).
- Protect the fair and consistent administration of the company safety rules.
- Set an example by always following the company safety rules.

Middle Management

Middle management's responsibilities within the adherence of the Company Safety Rules include, but are not limited to the following:

- Adapt, implement and apply all areas of this section.
- Confirm supervisors are trained in the implementation of this section.

- Protect the fair and consistent administration of the company safety rules.
- Set an example by always following the company safety rules.

Supervision

Supervision's responsibilities within the adherence of the Company Safety Rules include, but are not limited to the following:

- Receive training on understanding the company safety rules.
- Implement the process so all workers, management, including subcontractors, visitors and selfemployed person receive a fair and consistent administration of the company safety rules.
- Set an example by always following the company safety rules.

Worker

Worker's responsibilities within the adherence of the Company Safety Rules include, but are not limited to the following:

- Follow all company safety rules at all times.
- Set an example by always following the company safety rules.

Subcontractors

Subcontractors responsibilities within the adherence of the Company Safety Rules include, but are not limited to the following:

- Follow all company safety rules at all times.
- Set an example by always following the company safety rules.

Self-Employed Persons

Self-employed persons responsibilities within the adherence of the Company Safety Rules include, but are not limited to the following:

- Follow all company safety rules at all times.
- Set an example by always following the company safety rules.

Housekeeping Guidelines

Maximum Mechanical Services has a high standard of housekeeping and expects workers to the following:

- Remove all sharp waste materials such as nails in wood.
- Verify through inspection that tools and/or materials on raised areas are stable.

- Secure all items that have the risk of being blown around by the wind.
- Keep all platforms, walkways, and emergency exits clear so there is safe access and egress to and from all work areas.
- Immediately clean up spills and slippery materials. Clean up and discard product once spill is fully absorbed.
- Maintain clear access to fire extinguishers, electrical panels, circuit breakers, exit doors, safety shower/eye wash stations, muster points, and emergency vehicle access at all times.
- Remove/clean up all tools and debris in work areas such as tools, ladders, material, and garbage. Verify through inspection that the work areas at the end of each task and at the end of each day are safe from slip, trip, and falling hazards.
- Maximum Mechanical Services will provide equipment or tools that have adequate capacity, strength, and the ability to safely perform the appropriate task.
- Cigarette butts must be disposed of in the appropriate receptacles.

Maximum Mechanical Services Safety Rules

	NO SMOKING OUT OF DESIGNATED AREA	NO ALCOHOL/DRUGS	SECURE HAIR FIRMLY
	USE PROPER LIFTING TECHNIQUES	DO NOT WALK UNDER SUSPENDED LOADS	SECURE COMPRESSED GAS CYLINDERS IN AN UPRIGHT POSITION
X	USE THE RIGHT TOOL	WEAR SEAT BELTS WHILE OPERATING VEHICLES AND EQUIPMENT	WEAR PROPER PPE
	NO THEFT/VANDALISM	NO FIGHTING, HORSEPLAY	NO WEAPONS AT WORKSITES
PERMIT	WORK WITH A VALID WORK PERMIT WHEN REQUIRED	CONDUCT GAS TESTS WHEN REQUIRED	LOCK OUT/TAG OUT ENERGY SOURCES
	PROTECT YOURSELF AGAINST A FALL WHEN WORKING AT A HEIGHT	WHILE DRIVING, DO NOT USE YOUR PHONE AND DO NOT EXCEED SPEED LIMITS	FOLLOW THE PRESCRIBED JOURNEY MANAGEMENT PLAN

- Report all unsafe work conditions and near misses.
- Report all incidents that result in injury or damage.
- Follow all safe work practices, procedures, and codes of practice.
- Arrive fit for duty and remain fit for duty during hours of work.
- Do not damage safety, fire fighting, or first aid equipment.
- Use only grounded or double insulated electrical hand tools as per CSA standards.
- Tag and remove worn, defective, outdated or otherwise non-functional equipment or parts from the worksite.

- Only operate company vehicles and mobile equipment in accordance with Safe Work Practices.
- Use equipment or tools that have adequate capacity, strength, and ability to safely perform the appropriate task.

Cell Phone Usage/Electronic Devices

Personnel will not use a hand-held mobile devices for any reason including texting while driving a vehicle or operating equipment.¹

A wireless headset or hands-free device may be used while driving a vehicle, but not while operating equipment. Even when this requirement has been met, workers are strongly encouraged to keep calls as brief as possible, and to pull off the roadway in a safe location to make calls or read/respond to emails/text messages.

Non-Compliance

Supervision will immediately correct any violation of Maximum Mechanical Services' Company Safety Rules, Codes of Practice, Safe Work Practices and Safe Job Procedure before the violations become standard practice and disrupts the normal work environment. Any failure on the part of the Supervisor to immediately correct a violation or substandard practice is the equivalent of the supervisor excusing the practice.

In most cases, violations result from a lack of training, ignorance of the rules, or an attempt to cut corners. Supervision will be required to investigate the non-compliance and determine the root cause of the infraction. As an example, violations from lack of training will be corrected through improvements to the communication and training process whereas, a violation due to a blatant disregard for company policies will be corrected through the disciplinary policy.

¹ Alberta Traffic Safety Act, Part 5 – General Operation, Section 115.1

Section 11 – Inspections

Purpose

Inspections are a critical part of a comprehensive Health, Safety, and Environment Management System (HSE-MS). They assist in controlling losses to individuals, equipment, materials and the environment through early identifying and correcting of unsafe conditions, events, acts and behaviours.

All inspections will be conducted to verify compliance with applicable Legislation (i.e., occupational health and safety regulations, *Traffic Safety Act*).^{1,2}

It is the goal and duty of Maximum Mechanical Services to maintain a comprehensive program of inspections at all facilities and worksites. Inspections conducted are designed to:

- Ensuring risk control measures are in place and effectively protecting employees.
- Identifying other potential hazards that have not yet been assessed.

This program applies to the inspection of all operating locations, including head office, as well as all project worksites and will be implemented in conjunction with a comprehensive preventative maintenance program.

Roles and Responsibilities

Senior Management

Senior management's responsibilities within the inspection program include, but are not limited to the following:

- Ensure an effective process is in place to confirm that all equipment used by employees will adequately perform functions it is designed to perform and is free of major defects.
- Ensure an effective process is in place for the inspection of premises, equipment, environment and work practices/methods at regular/appropriate intervals.
- Participate in one worksite inspection every quarter which is to be documented on the worksite inspection checklist

Middle Management

Middle management's responsibilities within the Inspection program include, but are not limited to the following:

- Coordinate the inspection process to ensure the minimum frequency of inspections is being met.
- Support the supervisors in the implementation of corrective actions identified during the inspection processes.
- Participate in one worksite inspection every quarter. Document on the worksite inspection checklist.

¹ Alberta Occupational Health and Safety Act, Part 1, Section 3 - Obligation of Employers

² Alberta Occupational Health and Safety Act, Part 8 - Compliance and Enforcement, Section 64

Supervision

Supervision's responsibilities within the Inspection program include, but are not limited to the following:

- Verify through inspection that all requirements under the Maximum Mechanical Services HSE-MS are followed on worksites under his/her control.
- Conduct both, informal and formal inspections within the designated work area at the frequencies prescribed in this section.
- Participate in one worksite inspection every quarter to be documented on the worksite inspection checklist.
- Inspect tools and equipment prior to use and document on the tools and equipment checklist.
- Implement corrective actions in a timely manner to eliminate the condition or recurrence of any deficiencies identified.
- Verify that tools and equipment with a major defect identified on the inspection checklist are removed from service.

Employee

Employee's responsibilities within the Inspection program include, but are not limited to the following:

- Participate in inspections as required.
- Perform pre-use inspections of tools and equipment (see Tools and Equipment Checklist form).
- Remove from service and tag any tools, equipment, structures and PPE with major defects.
- Report all defective or unsafe tools or equipment to their supervisor immediately.
- Conduct information inspection regularly to identify at-risk hazards and report them to their supervisor as soon as reasonably practicable.

Category of Inspections

There are two classifications of inspections to be completed in the workplace:

- **Formal Inspections** Planned inspections that use established procedures, checklists and are often on a set schedule, such as equipment inspections.
- **Informal Inspections** Ongoing inspections not on a set schedule, procedure or definitive checklist, such as the visual inspection of PPE.

Inspection Procedure

The following outlines the inspection procedure is for conducting an inspection, from the initial review of the worksite, tool, or mobile equipment, to the follow-up requested on major defects. Specific information to be inspected is available on inspection checklists. Inspection checklists are created based on manufacturer

specifications and applicable legislative requirements in conjunction with the opinions of experienced and qualified personnel

- 1. Conduct inspection at the prescribed frequency.
- 2. Stop work when undue hazards exists.
- 3. Document deficiencies on the inspection checklist.
- 4. Supervisor to assign the corrective action to an employee and assign a attainable due date.
- 5. Prioritize deficiencies.
- 6. Sign and date the inspection form.
- 7. The inspection form is to be signed by management (or designate) and forwarded to the respective supervisor for corrective action.
- 8. All corrective actions taken will be noted and dated on the form.
- 9. A copy of the completed inspection report will be retained in the HSE-MS files.
- 10. A record of outstanding inspections with deficiencies or outstanding corrective actions will be kept to account for the timely completion of corrective actions.

Types of Inspections

Management, supervisors and employees are to work together to complete the following types of inspection as a necessary process to verify that Maximum Mechanical Services is adhering to applicable legislation and manufacturer specifications:^{3,}

- 1. Worksite/office/shop/facility
- 2. Work activities:
 - Equipment operations
 - Materials and work areas
- 3. Tool and mobile equipment inspections
- 4. Portable fire extinguishers
- 5. PPE Inspections
- 6. Trip inspections

Worksite/Office/Shop/Facility Inspections

Worksite, office, shop and facility inspections are to be conducted as a verification that all company employees are following the practices set out in the HSE-MS.

³ Alberta Occupational Health and Safety Act, Part 8 - Compliance and Enforcement, Section 64 - Regular Inspection of Worksite

The supervisor is required to select a team of personnel to inspect the various areas of the worksite. The team should be comprised of one supervisor/management individual and one employee per area of the worksite being inspected.

Management will assign the inspection by department so that the number of worksite, office, and shop inspections conducted meets the required frequency set out in this section. Management will ensure that worksite, office, shop, and facility inspections are all completed in the month prior to the quarterly safety meeting; this will allow for any deficiencies to be discussed with all employees.

All inspections must be documented on the correct company inspection form and a corrective action plan developed for any deficiencies identified, as required.

Tools/Machinery Inspections

Tools/machinery inspections and checklists are developed to ensure that the tools/machinery are safe for use based on the manufacturer's instruction and specifications.

All deficiencies are to be noted on the inspection checklist provided for the tools/machinery. If possible, the deficiency should be corrected immediately. If the deficiency poses an unusual risk not normally associated with the proper functioning of that particular tools/machinery, then the tool or machinery is not to be operated.

Tag the tool or machine "Out of Service". Employees are to report major defect to their supervisor immediately as per legislation. ^{4, 5}

PPE Inspections

PPE inspections are conducted to verify the PPE is safe to use to effectively protect the employee as the last line of defense against hazards. Inspections will be done by each employee prior to use and documented on the Field Level Hazard Assessment (FLHA form).

Portable Fire Extinguishers

All portable fire extinguishers shall be in accordance with *Alberta Fire Code 2014* (AFC 2014) *and NFPA 10,* "Standard for Portable Fire Extinguishers," regarding the inspection, maintenance, recharging, placement, refurbishing of portable fire extinguishers and the applicable listing and labelling for use in Alberta.

Inspection

The inspection includes a "quick check" that a fire extinguisher is available for use and is in operating condition. It is intended to give reasonable assurance that the fire extinguisher is fully charged and the seal is intact. This is done by verifying that it is in its designated place, that it has not been actuated or tampered with, and that there is no obvious physical damage or condition to prevent its operation.

⁴ Alberta Occupational Health and Safety Act, Part 1 - Section 5 - Obligation of Workers

⁵ Alberta Occupational Health and Safety Regulations, Part 1 - General, Section 14(2) - Duties of Workers

Fire extinguishers shall be inspected monthly, or more frequent inspections when it is obvious that the extinguisher may be subjected to corrosive or damaging environments.

Inspections may be carried out by the owner, by an employee designated by the owner, or by a designated representative (i.e. commercial company). If the owner is in any doubt about the condition of a fire extinguisher following inspection they should contact a certified fire extinguisher servicing company to evaluate the operational integrity of the fire extinguisher.

Maintenance

Routine maintenance includes a thorough examination of the fire extinguisher. This examination is intended to give assurance that a fire extinguisher will operate effectively and safely. It includes a thorough examination for physical damage or conditions which might prevent the operation of the extinguisher and any necessary repair or replacement. An examination will usually reveal if hydrostatic testing or internal maintenance is required.

All fire extinguishers shall be subjected to maintenance not more than one year apart or when an inspection indicates a fire extinguisher is in need of maintenance.

Only companies that have had their facilities certified by an approved fire testing agency and only a qualified person working for the certified fire extinguisher servicing agency shall carry out the maintenance and recharging of fire extinguishers.

Trip Inspections

Trip inspections are formal inspections of both commercial and non-commercial vehicles. These inspections are to be conducted prior to use by the intended operator of the vehicle and meet the requirement set out in the *Commercial Vehicle Safety Regulation*.

All deficiencies are to be noted on the inspection checklist provided for the vehicle. If possible, the deficiency should be corrected immediately. If the deficiency poses an unusual risk not normally associated with the proper functioning of that particular vehicle, then the vehicle is not to be operated. Tag the vehicle "Out of Service". Employees are to report major defects to their supervisor immediately.

A copy of the completed trip inspection checklist is to be kept in the vehicle for twenty-four 24 hours and a copy retained at the main office/facility for review.

Government Agency Inspections

Government agency inspections are an independent review from representatives of governing bodies such as environmental, health and safety, and building codes departments of local government. The agents of these departments attending any of Maximum Mechanical Services's projects, facilities, or offices will be given full cooperation and be treated in a professional and courteous manner by all Maximum Mechanical Services personnel. Government Agency inspectors have the right to the following:

- Enter and inspect any worksite.
- Review and procure copies of any HSE documentation.
- Inspect, photograph, or seize any tool or piece of equipment, or take samples of any material at the worksite.
- Interview any employee at the worksite.
- Stop work.

Supervisors and management are to be immediately informed of a local government inspector who arrives on site to conduct an inspection of the project. Management (or designate) will accompany the inspector during the full course of the site inspection.

All orders or citations resulting from a government inspection will be addressed immediately in conjunction with the support from employees, supervisor, management and senior management.

Occupational Health and Safety (OH&S) Inspections and Penalties

Occupational Health and Safety (OH&S) Officers (Provincial)

OH&S officers have the authority to request various equipment, information, forms and documents based on authority given to them under the provincial legislation of the jurisdiction in which they operate.

Administrative Penalties

Administrative penalties can be applied to:6,

- Employers
- Employees
- Subcontractors
- Prime Contractors
- Suppliers

Inspection Process and Undue Hazards

Supervisors or employees may identify a situation in the course of an inspection where employees are determined to be in undue hazard. Undue Hazards refers to any danger that is not normally present in a job or to any dangerous conditions under which employees would not normally perform their work.⁷

⁶ Alberta Occupational Health and Safety Act, Regulations and Code, Part 8 - Compliance and Enforcement, Section 68, Administrative Penalties

⁷ Alberta Occupational Health and Safety Act, Part 4 - Dangerous Work and Discriminatory Action, Section (31)

MAXIMUM MECHANICAL SERVICES

Anytime undue hazard is observed during an inspection:

- The respective work being performed will be stopped immediately.
- The supervisor of the area will be notified and will respond immediately.
- The supervisor will ensure that all employees are safe.
- Potentially dangerous situations must be effectively mitigated before work resumes.
- An investigation may commence as deemed by management.

Employees must refuse to perform any job they believe would put them or their fellow employees in imminent danger.

Inspection/Participation	Worksite	Office	Shop	Light Vehicles	PPE
Senior Management	Quarterly		6 Months intervals		
Middle Management	Quarterly		6 Months intervals		
Supervisor	Quarterly		6 Months intervals		
Employees				Pre-Use	Pre-Use

Summary of Inspection Frequencies

Record Retention

Worksite, office, shop and facility inspections are to be recorded and kept on file for three (3) years.

Tools and equipment inspections with no major defects are to be recorded and kept on file for three (3) years. Inspections with major defects identified are to be kept on file for five (5) years.

Section 12 – Preventative Maintenance Program

Purpose

The purpose of this policy is to ensure all tools, equipment, machinery, personal protective equipment (PPE) and vehicles are in safe working condition and properly maintained so they operate safely and reliably.

Definitions

There are two classifications of preventative maintenance to be completed in the workplace:

- **Routine Maintenance** is planned comprehensive checks conducted by qualified personnel following a specific preventative maintenance schedule which outlines the criteria and the frequency of the maintenance for each tool, equipment, machinery, PPE and vehicles.
- **Non-Routine Maintenance** does not follow a pre-determined schedule and is scheduled as dictated by deficiencies noted in a formal or informal inspection. If major defects are noted then the defective item must be tagged and taken out of service for maintenance.

Objectives

Tools, equipment, machinery, PPE and company vehicles will be:

- maintained as per manufacturer's specifications.
- used for activities intended and designed for by the manufacturer
- appropriate for work being performed.

All of Maximum Mechanical Services tools, equipment, machinery, PPE and vehicles used on any worksite must be inspected and maintained according to legislation and manufacturer's specifications. To ensure this happens, Maximum Mechanical Services will maintain an accurate inventory of the company's machinery and equipment. Maximum Mechanical Services shall incorporate manufacturer's specifications to determine a preventative maintenance schedule.^{1, 2}

Records of all preventative maintenance must reflect information pertaining to equipment identification, type of deficiencies identified requiring adjustment or repair as well as the maintenance and repairs performed. All preventative maintenance shall be performed by a qualified person and signed off.

Major Defects found in machinery or equipment will be tagged; the machinery or equipment will be locked out of service and must be repaired prior to next use. Replace machinery or equipment if necessary.

¹ Alberta Occupational Health and Safety Code, Part 3 - Specifications and Certifications, Section 13

² Alberta Occupational Health and Safety Act, Part 18 - Personal Protective Equipment, Section 228 (1) 2

Scope

The company will maintain an accurate inventory of the company tools, equipment, machinery, PPE and vehicles requiring preventative maintenance

Records of maintenance will include the following:

- Equipment name/description,
- Serial number and unit number, if applicable, and
- Deficiency or repair required.

Standards

This program will be implemented in conjunction with a comprehensive inspection program.

The following standards apply to the preventative maintenance criteria and purchasing/renting/leasing requirements of this program:

- CSA Standards/ANSI
- NSC Standard 11 for Commercial Vehicles
- Provincial OH&S code
- Owner/operator's manuals
- Manufacturer's recommendations
- Industry recommended practices

Roles and Responsibilities

Senior Management

Senior management's responsibilities within the Preventative Maintenance Program include, but are not limited to the following:

- Ensure an effective process is in place to confirm that all equipment used by employees is maintained in a condition that will not compromise the health or safety of employees using or transporting the equipment, that the equipment will adequately perform functions it is designed to perform and that the equipment is free of major defects.
- Ensure an effective process is in place to confirm that the preventative maintenance program remains applicable, relevant and compliant with legislation, industrial standards and manufacturer specifications.
- Only purchase, rent, or lease equipment, machinery, PPE and vehicles that are manufactured in accordance with all provincial and federal legislation, and all manufacturing standards set out by governing authorities (i.e., CSA, ANSI, etc.).

Middle Management

Middle management's responsibilities within the Preventative Maintenance Program include, but are not limited to the following:

- Confirm adequate training of supervisors in the implementation of the preventative maintenance program.
- Use only qualified personnel to conduct maintenance on equipment, machinery, PPE and vehicles.

Supervision

Supervision's responsibilities within the Preventative Maintenance Program include, but are not limited to the following:

- Follow the preventative maintenance schedules as per applicable frequencies.
- Enforce compliance with this program in their respective work areas.
- Ensure unsafe equipment, machinery, tools, vehicles and personal protective equipment is not assigned and not available to employees for use or operation.
- Monitor defective equipment, machinery, PPE and vehicles and schedule for non-routine maintenance or replacement as needed.
- Ensure personnel is qualified to perform assigned tasks.
- Verify employee and third-party certifications and accreditations as applicable.

Employee

Employee's responsibilities within the Preventative Maintenance Program include, but are not limited to the following:

- Inspect the equipment, machinery, PPE assigned to them prior to use or operation.
- Remove from service and tag any tools, equipment, structures and PPE that affects the safe operation, or violates the manufacturer specifications.
- Report all damaged tool and equipment to their supervisor.

Preventative Maintenance Requirements

Standards exist on the required frequency of maintenance of equipment, machinery, PPE and vehicles. These standards come from a variety of sources including:

- CSA Standards
- NSC Standard 11 for Commercial Vehicles
- Legislative requirements

- Owner's/Operator's Manuals
- Manufacturer's Recommendations and Specifications³
- Industry Recommended Practices
- Commercial Vehicle Safety Regulation

All equipment, machinery, tools, vehicles and PPE that are scheduled for routine maintenance will not be assigned or readily available for use or operation by employees.

Routine checks and maintenance shall be conducted in accordance with the applicable requirements set out in this section of the HSE-MS.

Types of Preventative Maintenance

Equipment, Vehicles, and Trailers

Kilometers and hours of use are to be reported to the supervisor in order to maintain the schedule of maintenance. Pre-use and post-use and trip inspections, as well as daily time tickets, or mileage logs/reports are effective sources for documenting kilometers and hours of use. The following items will be repaired and certified by the manufacturer or a designated representative thereof when needed:

- Rigging equipment
- PPE
- Compressors and pneumatic tools
- Cranes and hydraulic lifting devices
- · Emergency service and rescue equipment
- Fire extinguishers

Tools

Powered/non-powered tools and ladders are to be tagged and removed from service and scheduled for repair or replacement at the sign of any form of wear that poses a risk to employees, property, or the environment. This includes, but is not limited to:

- Striking surfaces
- Handles
- Safety devices
- Rungs
- Feet/pads

- Blades
- Power cords
- Safe guards
- Risers

- Electric power tools
- · Triggers and switches
- Motor housings
- Uprights

³ Alberta Occupation Health and Safety Regulation, Part 1 - General, Section 15 (2) f

Schedule of Preventative Maintenance

This schedule outlines the frequency at which comprehensive checks and maintenance will be completed as per manufacturer's specifications, industry standards or a more stringent frequency established by Maximum Mechanical Services.

Preventative maintenance is a regularly scheduled maintenance activity to reduce unexpected maintenance and overall operating costs.

As an example, fire extinguishers must be properly maintained to ensure that they will work when needed, and that they are safe to use. Adequate maintenance of extinguishers consists of regular inspections, recharging as needed, and a complete annual checkup and servicing. The following would make up the preventive maintenance program for fire extinguishers:

- Scheduled annual checkup and servicing (Routine Maintenance)
- Identified recharging as needed (Non-Routine Maintenance)

The following is a preventative maintenance schedule for commonly used tools and equipment.

	Daily/ Pre-Use	Weekly	Monthly	6 Months	Annually	Manufacturers Specifications
Mobile Equipment						✓
First Aid Kits			\checkmark			
Fire Extinguishers	\checkmark		\checkmark		\checkmark	✓
Tools	\checkmark					
Personal Protective Equipment	\checkmark					
Respiratory/Protective Equipment (SCBA/SABA)	\checkmark					
Fall Protection/Restraint	\checkmark					
Machinery						
Trailers						

Record Retention

All records of maintenance work carried out, including inspections, must be kept.

All tool and equipment repairs, as well as inspections documenting major defects, are to be recorded and kept on file for five (5) years.

Section 13 – Records and Statistics

Purpose

Maximum Mechanical Services will maintain records and statistics relating to health and safety as required by legislation and the Workers' Compensation Board (WCB) to enable management to identify, monitor and evaluate the effectiveness of safety performance. Records and statistics will be maintained for the following:

- Incident investigation
 - First aids
 - Medical treatment cases
 - Lost time cases
 - Restricted work cases
 - Non compliance
 - Equipment damage
 - Property damage
 - Motor vehicle incidents
 - Environmental spill
 - Lost time workdays
 - Restricted workdays
- HSE Trending
 - Monthly trending (TRIF, LTIF)
 - Yearly trending (TRIF, LTIF)

- Safety Communications
 - Inspections
 - Safety meetings
 - Toolbox/tailgate meetings
- WCB Claim Information
 - Medical records
 - Employer reports
 - Employee reports
- WCB Trending
 - Monthly claim cost summaries
- Other Records and Statistics
 - Equipment hours
 - Vehicles mileage
 - Near misses

Note: An incident is an event that precipitates the need for first aid or medical treatment and can lead to lost time, whereas a case reflects not just the incident, but the whole case file/documentation/follow-up activities related to the incident.

Definitions

First Aid Incident – A work related incident that typically does not require attention from a health care professional. First aid incidents include those where an individual visits a health care professional solely for:

- Observation
- Non-prescription medication
- Wound covering
- · Removal of foreign bodies from a wound (uncomplicated)
- Removal of foreign bodies from an eye via irrigation or cotton swabs

MMS-HSE-MS-V.5 - September 7, 2022

- Treatment of 1st degree burn, hot or cold therapy
- Diagnostic test (i.e. x-ray, blood test)
- Issuance of a non-rigid means of support
- · Use of temporary immobilization devices (i.e. sling)
- Use of eye patches
- Use of finger guards
- Tetanus immunization
- Cleaning of a wound on skin surface
- Drilling a nail to relieve pressure
- Drinking of fluids to relieve heat stress
- Massage (except when prescribed by a health care professional)

Injury – Any cut, fracture, sprain, amputation, loss of consciousness, etc. which results from an exposure involving a single event (or number of linked events close together in time) in the work environment. Injuries are caused by essentially instantaneous events. Note that conditions resulting from animal or insect bite, or from one-time exposures to chemicals, are considered to be injuries. Work-related events, including overexertion that aggravates a pre-existing condition are deemed to be injuries.

Illness – An illness is any abnormal condition or disorder, other than one resulting from an injury, caused by exposure to environmental factors associated with employment.

Lost Work Case (LWC) – Lost workday case is a work-related injury that causes the injured person to miss work and is temporarily unable to perform any regular job or restricted work activity. Lost workday case does not include regular scheduled days off (i.e., normal days off, holidays) or the day on which the injury occurred. In cases where employment has been terminated, this would include any workdays lost that had been previously scheduled, or any estimate of workdays that would be lost after termination. A single incident can result in several lost workday cases, depending on how many people were injured in the incident.

Lost Workdays – The number of lost workdays is the total number of scheduled workdays on which an injured employee misses work and is temporarily unable to perform their regular job or restricted work activity. Lost workdays will continue until the employee returns to work. If the injury persists and the employee has been terminated, the number of days to be counted as lost workdays will be estimated based on the medical condition of the injured employee at the time of termination.

Lost Time Incident (LTI) – A work-related injury that causes the injured person to miss work and be temporarily unable to perform any regular job or restricted work activity. A lost time incident does not include regular scheduled days off (i.e., normal days off, holidays) or the day on which the injury occurred. In cases where employment has been terminated, this would include any workdays lost that had been previously scheduled, or an estimate of workdays that would be lost after termination.

Lost Time Injury Frequency (LTIF) – This measures the number of lost time injuries in the exposure period as a percentage of the workforce. It is calculated by multiplying the number of lost time injuries (LTI) by 200,000 and dividing by the exposure hours (total number of hours) worked during the period

LTIF = <u>Number of Lost Time Injuries x 200,000</u> Exposure Hours

Near Miss – An event or action that could have resulted in personal injury, illness, or equipment, property or environmental damage.

Medical Treatment Incident – A work related incident which involves medical treatment from a health care professional followed by immediate return to work without restrictions.

Medical treatment includes:

- Issuance of prescription medication
- Wound closing/suturing
- Removal of foreign bodies from a wound (complicated)
- Removal of foreign bodies from an eye (except irrigation and cotton swab)
- Treatment of infection
- Treatment of a bruise via blood drainage
- Treatment of 2nd/3rd degree burn
- Issuance of a rigid means of support, amputation/permanent loss of usage, vaccine (except tetanus), and cutting away dead skin

Medical treatment incidents does not include:

- visits to a physician or other licensed health care professional solely for observation or counselling.
- "first aid" as defined in this section.

Restricted Workdays – The number of restricted workdays is the total number of scheduled workdays on which the injured employee was temporarily unable to perform all normally assigned work functions. Restricted workdays will continue until the employee is declared fit to return to normal work. If the injury persists and the contract has been terminated, the number of days to be counted as restricted workdays will be estimated based on the medical condition of the injured employee at the time of termination.

Total Recordable Injury – Total recordable injuries are the sum of fatalities, lost workday cases, restricted work cases and medical treatment cases.

Total Recordable Injury Frequency (TRIF) – Similar to LTIF, TRIF measures the number of total recordable injuries in the exposure period as a percentage of the workforce. It is calculated as follows:

TRIF = <u>Total Recordable Injuries x 200,000</u> Exposure Hours

Roles and Responsibilities

Senior Management

Senior management's responsibilities to meet records and statistical requirements include, but are not limited to the following:

- Ensure a process is in place for maintaining confidentiality of medical and other personal information.
- Ensure a process is in place to collect data to summarize and analyze health and safety environment data information in order to identify areas for improvement.

Middle Management

Middle management's responsibilities to meet records and statistical requirements include, but are not limited to the following:

- Manage confidential medical and other personal information as required under privacy laws.
- Review health, safety and environment statistical trending to determine opportunities for improvements within the HSE-MS.
- Prepare quarterly safety reporting summary.

Trending of Safety Statistics

Data collected relating to safety provides management with an overview of our program's activities and results. Examining the data and preparing data summaries provides information to identify trends and setting priorities for future safety program measures. These summaries will be circulated to all management levels within Maximum Mechanical Services and are to be reviewed with employees at regular safety meetings. A monthly Maximum Mechanical Services statistical summary will consist of a breakdown of:

- Lost Work Cases and Lost Workdays
- Lost Time Injury Frequency Rate (LTIF)
- Restricted Work Cases and Restricted Workdays
- Medical Treatment Cases
- Total Recordable Injury Frequency Rate (TRIF)
- First Aid Incidents

Annual Safety Report

- Near Misses
- Motor Vehicle Incidents
- Equipment Damage
- Property Damage
- Environmental Spills

On an annual basis, management will prepare a safety report summarizing the safety successes and opportunities from the previous year. This report will include statistical summaries, incident summaries, training information, ongoing safety projects, successes, and project plans for the following year.

Permanent Facility Safety Files

An electronic safety filing system will be maintained that includes:

- Emergency Response Plans
- Pre-Job Hazard Assessments
- Job Safety Assessments
- Field Level Hazard Assessments
- Safe Work Practice Review
- Safe Job Procedure Review
- Employee Orientations and Mentorship
- Training Records
- On-the-Job Training Records
- Competency Assessments
- Approved Driver Records and Driver's Abstracts
- Safety Alerts

- Subcontractor Management Documentation
- Subcontractor Inspections
- Daily Toolbox Meetings
- Safety Meetings
- Worksite, Office, and Shop Inspections
- Incident Reports and Supporting
 Documents
- Completed Audits
- Preventative Maintenance supporting documentation
 - Pre-Use Inspections

OHS legislative standards are available at: <u>https://www.alberta.ca/ohs-act-regulation-code.aspx</u>

Medical Information

Medical information is to be considered confidential and access is to be restricted to authorized personnel.

A safety filing system will be maintained for confidential human resource information that includes:

- Testing results as per the Canadian Model (discussed in the Alcohol & Drug Program Section of this Manual)
- Medical information including first aid records
- Restricted work offers
- Restricted work and lost time reports
- WCB documentation

Access to this information will comply with the *Provincial Freedom of Information* and *Protection of Privacy Act (FOIP)* and *Federal - Personal Information Protection and Electronic Documents Act.*

As an example, medical and First Aid records are considered confidential and access to these records is restricted to the following personnel unless written permission is provided by an affected employee:

- Persons providing medical or first aid.
- Persons conducting incident investigation.
- Persons authorized under legislative authority.

An employee can allow their First Aid record to be made available to other persons but permission must be in writing indicating the information that can be released, the name of the person to whom the information is to be released, the date and the employee's signature. The employee does not have to provide this permission.

Recordability of Occupational Injuries and Illnesses

Guide to Determination of Recordability of Incident

Only work-related injuries classified as being more severe than first aid are incidents considered recordable for benchmarking purposes. The decision making process (Injury Classification Figure) for determining recordability consists of four steps:

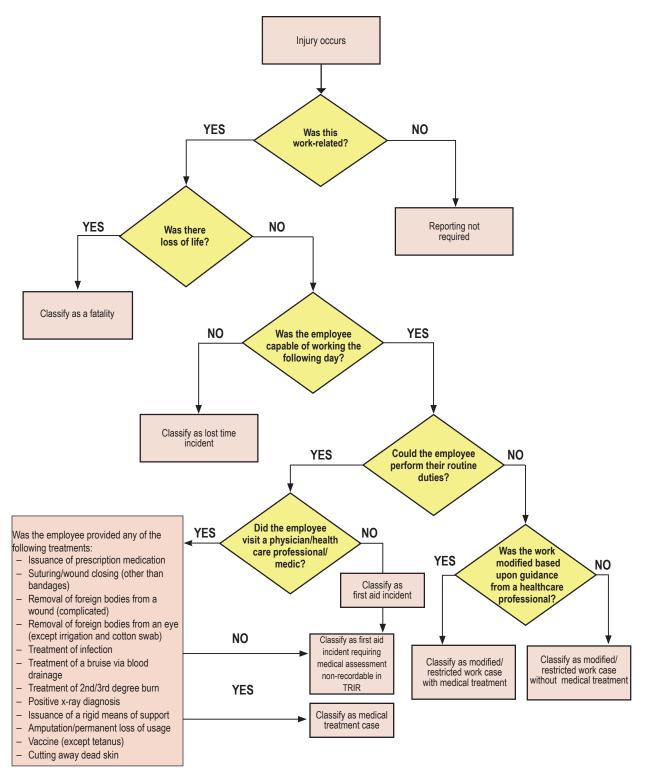
- 1. Establish that the injury is work-related, resulting from an event or exposure in the work environment.
- 2. Determine whether a case occurred; that is, has there been an illness or an injury more severe than first aid? (See earlier definitions).
- 3. Determine whether the case is an injury or an illness. (See definitions section to assist in the classification of injuries and illnesses).
- 4. Classify the case as being the most severe of the following:

- Fatality
- Lost time injury (incurring workdays lost beyond the day of the incidents)
- Restricted work case
- Medical treatment case (See definitions section to distinguish medical treatment case from a first aid incident).

An injury or illness may progress from a lower category to a higher or more severe category. It shall be reported in the higher category only.

An injury or illness shall be classified according to the treatment rendered or the capability to work rather than time away if an employee is unable to return to the place of work due to travel arrangements.

Injury Classification



Note: Record each incident only once, at the highest level of severity, in the quarter in which it first occurred.

MMS-HSE-MS-V.5 - September 7, 2022

Effective Date: Revision Date: Revision No.:

Record Retention

All completed safety documentation shall be retained for a minimum of three (3) years after the document was created.

The following documents must be kept for at least the following period:

Document	Record Retention Description
Current Training Records and Competency Assessment	Life of the employment
Field Level Hazard Assessment	Three (3) years from date of assessment
Safety Meetings	Three (3) years from date of meeting
Inspections with no defects	Three (3) years from date of inspection
Inspections with major defects	Five (5) years from date of inspection
Investigation Report and Related Documents	Three (3) years from date of incident
Medical Information	Three (3) years from date of treatment
First Aid Records	Three (3) years from date of incident
Emergency Response Drill	Three (3) years from date of drill
Audiometric Testing	Ten (10) years from date of test
Preventative Maintenance Records	Five (5) years from date of activity
Safety Data Sheets (SDS)	Thirty (30) years after employee was exposed during a workplace incident
Log Books	Six (6) months from date of activity

Health and Safety Activity Summary					
For the Period Ending:					
	-				d.
□ Monthly		Quarterly		□ Year	iy
Numbers of Employees Hired:					-
Number of completed orientations:					-
Number of Toolbox meetings scheduled:					-
Number conducted:					-
Percentage attendance:					-
Number of formal inspections scheduled:					-
Number completed:					-
Total unsafe acts/conditions identified:					-
Number corrected:					-
Number outstanding:					-
Number of reported incidents					
– Damage only:					_
– Injury only:					_
 Injury and damage: 					_
- Vehicle accident:					_
– No-loss:					-
Number of investigations					
– Completed:					-
– Outstanding:					-
Number of recommendations made					_
– Completed:					_
– Outstanding:					-
Comments:					
Manager's Signature:		Date:			

Effective Date: Revision Date: Revision No.:

Section 14 – Alcohol and Drug Program

Purpose

Maximum Mechanical Services is committed to ensuring a safe, healthy and reliable worksite. This commitment extends to the safety of Maximum Mechanical Services's employees, customers and the general public.

Maximum Mechanical Services employees may work on sites with equipment and material in an environment that can pose a threat to the safety of themselves, their co-workers and others if fit for duty.

Maximum Mechanical Services recognizes that the misuse of alcohol and drugs impairs employee health, productivity and the overall goal of maintaining a safe work environment Maximum Mechanical Services has a duty to maintain a safe work environment under occupational health and safety legislation. Such legislation requires employers to address workplace hazards, such as alcohol and drugs. As such Maximum Mechanical Services is committed to maintaining a safe, healthy and productive work environment free of alcohol and drug use and requires employees and contractors to report to work fit-for-duty by not being under the influence of alcohol or drugs.

Awareness of the potential risks associated with the use of alcohol or drugs can assist in providing a safe, healthy and productive workplace.

By implementing and adhering to this program, Maximum Mechanical Services will:

- provide a safe worksite.
- provide access to prevention programs that emphasize awareness, education and training with respect to the use of alcohol and drugs.
- assist employees who voluntarily seek assistance for a personal problem in obtaining an assessment, counselling, referral, and rehabilitation services.
- take appropriate steps to investigate any possible violation of this program.
- make arrangements for an assessment if, in the course of any performance related discussion, an employee states that they have a problem with alcohol or drugs.
- actively support and encourage rehabilitation activities and re-employment opportunities where applicable.
- provide supervisory training and awareness in recognizing and addressing the use of alcohol and drugs in the workplace, as required.
- ensure that all employees understand the existence of the company guidelines and the Alcohol and Drug Work Rule as a part of orientation requirements.
- ensure that all employees understand the existence of the content of this program including the Alcohol and Drug Work Rule.

- ensure that any alcohol and drug testing is performed according to the standards set out in this program.
- decide which form of testing will be conducted for the work environment of the company (Oral or Urinalysis) as per the Canadian Model Version 06 and that testing protocols are followed as per this standard/document.¹

Definitions

Alcohol – Any substance that may be consumed and that has an alcoholic content equal to or in excess of 0.04 percent by volume.

Alcohol and Drug Work Rule – The alcohol and drug work rule set out in this program as per the Canadian Model policy.

Canadian Model Version 06 – Best practice alcohol and drug policy that stakeholders across Canada can adopt and follow as an integral part of an overall safety and loss management policy. The Canadian Model aims to articulate minimum industry expectations for a safe workplace, while recognizing that some companies may require higher or alternative standards based on the specific nature of their operations.

Company Business – Refers to all business activities undertaken by employees in the course of the Company's operations regardless of where the activities are conducted.

Company Workplace – Includes all real or personal property, facilities, land, buildings, equipment, containers, vehicles, vessels, boats and aircraft whether owned, leased or used by the company and wherever these may be located.

Designated Employer Representative (DER) – An employee authorized by the employer to take immediate action(s) to remove employees from safety-sensitive duties, or cause employees to be removed from these covered duties, and to make required decisions in the testing and evaluation processes. The DER also receives test results and other communications for the employer.

Drugs – Includes any drug, substance, chemical or agent, the use or possession of which is unlawful in Canada or requires a personal prescription from a licensed treating physician, or the use of which is regulated by legislation such as marijuana/cannabis, or any other psychoactive substance, and any non-prescription medication lawfully sold in Canada, and drug paraphernalia.

Employee Assistance Program (EAP) – Services that are designed to help employees who are experiencing personal problems such as alcohol and drug abuse. Also includes an Employee and Family Assistance Plan (EFAP).

¹ *Canadian Model for Providing a Safe Workplace*, Version 6, Page 2

Fit for Duty – The ability to safely perform assigned duties without any limitations due to the use or aftereffects of alcohol and/or drugs.

Incident – An occurrence, circumstance or condition that caused or had the potential to cause damage to person, property, reputation, security or the environment.

Laboratory – Meets the guidelines and standards of the Standards Council of Canada Laboratory Accreditation Program for Substances of Abuse or Mental Health Services Administration of the U.S. Department of Health and Human Services. Gas chromatography/mass spectrometry is the only authorized confirmation method.

Medical Review Officer (MRO) – A licensed physician with knowledge of substance abuse disorders and the ability to evaluate an employee's positive test results. The MRO is responsible for receiving and reviewing laboratory results generated by an employer's drug testing program and evaluating medical explanations for certain drug test results.

Negative Test Result – A report from the MRO that the employee who provided the specimen for alcohol and drug testing (laboratory-based) was not in violation of this program.

Non-prescription Drugs – Drugs that can be lawfully purchased without a prescription.

Positive Test Result – A report from the MRO that the employee who provided a specimen for alcohol and drug testing did have an alcohol or drug concentration level equal to or in excess of that in the Concentration Limits Table of this section and that the specimen must be sent to an accredited lab for confirmation.

Prescription Drugs – Drugs that can only be obtained with a prescription from a registered health care professional licensed to prescribe drugs. Prescription drugs must be made out to a specific individual, have a drug identification number and be dispensed by a licensed pharmacist.

Reasonable Grounds – Includes information established by the direct observation of the employee's conduct, or other indicators such as the physical appearance of the employee, the smell associated with the use of alcohol or drugs on his/her person or in the vicinity of his/her person, his/her attendance record, circumstances surrounding an incident or near miss, and the presence of alcohol, drugs, or drug paraphernalia in the vicinity of the employee or the area where the employee worked.

Rehabilitation Program – A program tailored to the needs of an individual which may include education, counselling, and residential care offered to assist a person to comply with the Alcohol and Drug Work Rules.

Risk-Sensitive Position – A position or class of positions identified by the employer pursuant to section 2.4 of the Canadian Model and articulated as per section 1.0 of the Canadian Model, normally remote from a worksite but that has authority to direct safety-sensitive employees or make potentially high-consequence decisions within a hazardous worksite, to which this policy shall apply in order to manage the safety risks of breaching the work rule outlined. See also safety-sensitive position.

Safety Sensitive Position (SSP) – a position in which individuals have a key and direct role in the operation where performance impacted by the use of alcohol or drugs could result in:

- an incident affecting the health or safety of employees, customers, the public or the environment.
- an inadequate response or failure to respond to an emergency or operational situation.
- an incident or practice that could negatively impact the company's financial position or goodwill in the communities where we operate.

Any employee designated in performing the duties associated with an SSP should be made aware that they are working in a SSP and that they must abide by the provisions of this program accordingly. SSPs within Maximum Mechanical Services are identified as managers, supervisors and employees.

Substance Abuse Expert (SAE) – A licensed physician, a licensed or certified social employee, a licensed or certified psychologist, a licensed or certified employee assistance expert, or an alcohol and drug abuse counselor. The SAE has received specific training to the SAE roles and responsibilities, has knowledge of and clinical experience in the diagnosis and treatment of substance abuse-related disorders, and has an understanding of the safety implications of substance use and abuse.

Tamper – To alter, meddle, interfere or change.

Work – Includes assigned responsibilities, training, and any other breaks from work while at a Maximum Mechanical Services's worksite or while training at a company workplace.

Worksite - A place at which a person performs work for Maximum Mechanical Services.

Roles and Responsibilities

The successful implementation of this program and the alcohol and drug rule is the shared responsibility of owner companies, contractors, supervisors, employees and labour providers.

Senior Management

Senior management's responsibilities within the alcohol and drug program process include, but are not limited to:

- ensuring a process is in place for the adoption and implementation of the alcohol and drug program.
- ensuring a process is in place for supervisors to be trained in the implementation of the alcohol and drug program.
- protecting the fair and consistent application of this program.
- preserving the confidentiality of any test results received, by not disclosing the test results to any
 person other than a person who needs to know the tests results, in order to consistently apply and
 meet the requirements of the alcohol and drug policy.

Middle Management

Middle management's responsibilities with the alcohol and drug program process include, but are not limited to:

- adapting, implementing and applying all areas of this program.
- confirming supervisors are trained in the implementation of this program.
- protecting the fair and consistent application of this program.
- preserving the confidentiality of any test results received, by not disclosing the test results to any
 person other than a person who requires the tests results in order to consistently apply and meet
 the requirements of the alcohol and drug program.

Supervision

Supervision must:

- be knowledgeable about and comply with this program including the Alcohol and Drug Work Rules and Procedure.
- complete supervisor awareness training in accordance with the minimum criteria set by the United States Department of Transportation (U.S. DOT) Employer Guidelines.
- ensure they comply with work standards as part of their responsibility to perform their work-related activities in an effective and safe manner.
- be knowledgeable about the use of alcohol and drugs and be able to recognize the symptoms associated with the use of alcohol and drugs.
- understand their company's performance management policy and how the Canadian Model is integral to that policy.
- take action on performance deviations.
- take action on reported or suspected alcohol or drug use by employees.
- preserve the confidentiality of any test results received, by not disclosing the test results to any person other than a person who requires the tests results in order to consistently apply and meet the requirements of the alcohol and drug program.

Supervision must not:

- allow an employee to perform their duties where the employee has a confirmed alcohol level equal to or in excess of 0.040 grams per 210 liters of breath or with a drug level equal to or in excess of the concentrations set in the Concentration Limits Table in this section.
- permit an employee to perform or continue to perform their duties on the worksite when there is actual knowledge or reasonable grounds to believe that the employee is using alcohol and/or drugs while performing the duties of their position.
- permit an employee to perform or continue to perform the duties of their position if they are using

prescription drugs that may impact their ability to work, except when the use is pursuant to the instructions of a licensed medical practitioner who has informed the employee that the substance will not adversely affect their ability to safely work at the worksite.

• permit an employee who refuses to submit to an alcohol or drug test to perform, or continue to perform, the duties of their position.

Employees

Employees must:

- have an understanding of the Alcohol and Drug Work Rule.
- take responsibility for ensuring their own safety and the safety of others.
- ensure they comply with work standards as part of their obligation to perform work activities in a safe manner.
- comply with the Alcohol and Drug Work Rule and follow appropriate treatment if deemed necessary.
- seek advice and follow appropriate treatment if they have a current or emerging problem with alcohol or drugs and follow recommended monitoring programs after attending treatment.
- encourage their peers or co-workers to seek help before there is a potential breach or breach of this program.
- cooperate as required with an investigation into a violation of this program.
- use medications responsibly, be aware of potential side effects and notify their supervisor of any potential unsafe side effects associated with the use of such medications where applicable.
- report to work Fit for Duty and remain Fit for Duty while on company business or while at a company worksite.
- report for testing and participate in testing as required and promote the integrity of the testing process without tampering, adulterating or interfering with testing.
- as soon as possible, inform their supervisor if they believe a co-worker is not Fit for Duty on the job or is otherwise in violation of this program.
- when requested, participate fully in required drug and alcohol test for any investigation under this program.
- after being involved in, or observing an incident, an employee must be available to submit to an alcohol and/or drug test. The employee would be exempt from testing if:
 - the employee is informed by the supervisor that they will not be tested.
 - the testing does not occur within eight hours for alcohol testing or within 32 hours for drug testing as the relevance of the test results will be diminished.

Employees must not:

- be in possession of, use, or offer for sale alcohol, drugs or drug paraphernalia while on company business or while at any company worksite.
- use, possess, or offer for sale any product or device that may be used to attempt to tamper with any sample for a drug or alcohol test while on company business or at a company worksite.
- report to work or work with an alcohol level equal to or in excess of 0.04 grams per 210 liters of breath or with a drug level equal to or in excess of the concentrations set in the *Concentration Limits Table listed in this section*.
- report for duty or remain on duty when using any prescription drug which may have potential unsafe side effects, except when the use is pursuant to the instructions of a licensed medical practitioner who has informed the employee that the substance will not adversely affect their ability to safely work at the worksite.
- intentionally misuse medications.
- refuse to submit to a required alcohol or drug test.
- tamper with a sample for an alcohol or drug test.
- operate a motor vehicle while under the influence of alcohol and/or drugs.

Contractors

Contractors hired by Maximum Mechanical Services must:

- provide a safe workplace.
- provide prevention programs that emphasize awareness, education and training with respect to the use of alcohol and drugs.
- ensure the guidelines in this program and the Alcohol and Drug Work Rule support other performance management systems.
- ensure effective employee assistance services are available to Contractor's employees.
- assist employees in obtaining confidential assessment, counselling, referral and rehabilitation services.
- actively support and encourage rehabilitation activities and re-employment opportunities where applicable.
- provide supervisory training and awareness in dealing with the use of alcohol and drugs in the workplace in accordance with the minimum criteria set by the U.S. DOT Employer Guidelines.
- participate with unions, employee associations and employers' organizations to assist in the provision of rehabilitation opportunities for persons who have problems with the use of alcohol and drugs.
- ensure that all employees understand the existence of and content of the guidelines in this program and the alcohol and drug work rule as part of the employee's orientation to the contracted company.

- ensure that any alcohol and drug testing is performed according to the standards set out in this program.
- decide which form of drug testing (urinalysis or oral fluid analysis) works in the context of their own work environment. Urinalysis is contemplated for all forms of drug testing in the Canadian Model. Oral fluid analysis is contemplated only for those forms of drug testing set out in section 4.8.2 in the Canadian Model.

Designated Employer Representatives (DERs)

The DERs will:

- administer the Alcohol and Drug Program.
- be the Liaison with drug and alcohol testing service agents.
- be informed of every test and its result.
- perform the functions necessary according to the results of the tests, including but not limited to taking immediate action(s) to remove employees from safety sensitive duties as authorized by the employer.
- make necessary decisions in the testing and evaluation process.
- receive test results and other communications for the employer and ensure confidentiality and security of documentation.

Alcohol and Drug Work Rule

The Alcohol and Drug Work Rule, with which employees are expected to comply for the common good of all, is specified in section 3.0 of the Canadian Model alcohol and drug policy.

- Do not use, possess or sell alcohol or drugs on company workplaces/time, and
- Do not report or work on the worksite if concentrations of alcohol or drugs exceed the cut-off limits specified in the policy.

As per the Canadian Model policy, an employee shall not:

- while at a Maximum Mechanical Services office or worksite, use, possess or offer for sale:
 - alcohol,
 - drugs other than those permitted under section 3.2 in the Canadian Model, or
 - any product or device that could tamper with any sample for an alcohol or drug test.
- report to work or work:
 - with an alcohol level equal to or in excess of zero grams per 210 litres of breath,
 - with a drug level equal to or in excess of the concentrations of the drugs set out in the Concentration Limits Table this section where a medical review officer has verified the results as a positive test result (i.e. no legitimate medical explanation), or

- while the employee's ability to safely perform his or her duties is adversely affected because of the use of alcohol and/or drugs, whether prescription drugs or non-prescription drugs, lawful or unlawful.
- refuse to:
 - comply with a request made by a representative of Maximum Mechanical Services under section 4.3 in the Canadian Model,
 - comply with a request to submit to an alcohol and drug test made under sections 4.4, 4.5, 4.6 or 4.7 in the Canadian Model, or
 - comply with a request to submit to an alcohol or drug test made under section 4.8 in the Canadian Model.
- tamper with a sample for an alcohol or drug test.
- an employee complies with section 3.1(a) or 3.1(b)(iii) of the Alcohol and Drug Work Rule in the Canadian Model, if he or she, while at a Maximum Mechanical Services workplace is:
 - in possession of a prescription drug or a non-prescription drug prescribed for them, such that:
 - the use of the prescription or non-prescription drug does not adversely affect the employee's ability to safely perform their duties,
 - the employee is using the prescription or non-prescription drug for its intended purpose and in the manner directed by the employee's physician, or pharmacist or the manufacturer of the drug,
 - the employee has notified their supervisor or manager before starting work of any potentially unsafe side effects associated with the use of the prescription or non-prescription drug, and
 - the employee complies with conditions and limitations set by Maximum Mechanical Services respecting the possession and use of the drug before reporting to or being at a Maximum Mechanical Services workplace or worksite.

Concentration Limits Table Testing Guidelines (as per the Canadian Model for Drug test standards COAA)

	UR	INE	ORAL			
Drugs or Classes of Drugs	Screening concentration equal to or in excess of ng/ml	Confirmation concentration equal to or in excess of ng/ml	Screening concentration equal to or in excess of ng/m	Confirmation concentration equal to or in excess of ng/m		
Marijuana metabolite	50	15	-	-		
Marijuana (THC)	-	-	4	2		
Cocaine metabolite	150	100	20	-		
Cocaine or Benzoylec- gonine			-	8		
Opioids		-	40	-		
Codeine	2000	2000	-	40		
Morphine	2000	2000	-	40		
Hydrocodone	300	100	-	40		
Hydromorphone	300	100	-	40		
Oxycodone	100	100	-	40		
Ocymorphone	100	100	-	40		
6-Acetylmorphine	10	10	-	4		
Phencyclidine	25	25	10	10		
Amphetamines	500	-	50	-		
Amphetamine	-	250	-	50		
Methamphetamine	-	250	-	50		
 MDMA¹ 	500	250	-	50		
• MDA ²	-	250	-	50		
Breath Alcohol Testing	g/L of breath					
Alcohol	0.04/210					

¹ Methylenedioxymethamphetamine

² Methylenedioxyamphetamine

Implementation of the Alcohol and Drug Program

Education

The likelihood that an employee will comply with the Alcohol and Drug Work Rules is increased if they know the safety risks associated with the use of alcohol and drugs. As a result, Maximum Mechanical Services is committed to informing employees of the existence of this Alcohol and Drug Program and take appropriate steps as are reasonable to inform its employees of the safety risks associated with the use of alcohol and drugs. Maximum Mechanical Services will also educate employees regarding the Alcohol and Drug Program.

Self Help

This program encourages employees who believe that they may require the help provided by Substance Abuse Experts (SAEs) and Employee Assistance Programs (EAP) to voluntarily request that help. An employee requesting help will not be subject to disciplinary action unless they:

- have failed to comply with the Alcohol and Drug Work Rule
- have been requested to confirm compliance with the Alcohol and Drug Work Rule
- have been requested to submit to an alcohol or drug test
- have been involved in an incident/injury.

An employee who believes that they may be unable to comply with the Alcohol and Drug Work Rule should seek help by:

- contacting a qualified SAE or a person responsible for the administration of an EAP, and where such services are not readily available, a medical doctor with knowledge in substance abuse disorders,
- informing a family member or friend, and/or
- informing a co-worker, a supervisor, or representative of the company of their wish to contact SAE or a person responsible for the administration of an EAP.
- in responding to an employee's request for help, a co-worker must inform a person in authority of the request.
- contacting Alberta Health Services (AHS) Addiction Recovery Centre at 1-866-332-2322 (Help Line).

In response to an employee's request for help, management or supervision or a person in authority must:

- take the necessary steps to ensure that the employee is fit for duty and presents no risk to themselves or herself or to others at the workplace.
- inform the employee of the assistance available under an EAP.
- encourage the employee to utilize the alcohol and drug services program which may assist the employee. Contact the EAP for more information.
- inform the employee that failure to meet the requirements below may result in the termination of their employment:
 - i. A medical assessment conducted by a medical doctor with knowledge in substance abuse disorders.
 - ii. An alcohol and/or drug test as set out in the test section.
 - iii. An assessment conducted by an SAE.

The employee must provide confirmation to the employer that he or she submitted to (i), (ii) and/or (iii) above, otherwise his or her failure to submit to (i), (ii) and/or (iii) above may result in the termination of his or her employment.

An employee who receives assistance from the support service for their use of alcohol and drugs must comply with the terms and conditions of any alcohol and drug program established to help the employee as a condition of their continued employment.

All employees, including those that are enrolled in an alcohol and drug assistance program or other counselling or treatment program must comply with the Alcohol and Drug Work Rules.

Possession of Alcohol or Drugs

If a Maximum Mechanical Services supervisor or manager has reasonable grounds to believe that an employee, while at a company worksite, may possess alcohol or drugs in contravention of the Alcohol and Drug Work Rules, the supervisor or manager must:

- request the employee to confirm that they do not have in their possession alcohol or drugs.
- request the assistance of appropriate authorities to confirm that the employee does not have in their possession alcohol or drugs.
- explain the reasons for the request.

Alcohol and Drug Testing

The following alcohol and drug screening and confirmation testing criteria listed below is consistent and complies with recognized industry standards such as Energy Safety Canada, and the Construction Owners Association of Alberta (COAA) model for providing a safe workplace. Maximum Mechanical Services will ensure that these standards are communicated to all levels of the company, and that employees may be required to test based on the following criteria:

- 1. Reasonable Grounds Testing
- 2. Incident and Near Miss Testing

Alcohol and drug testing includes site access, reasonable grounds, and post incident/near miss testing, will be performed in accordance with the provisions set out in the Canadian Model.

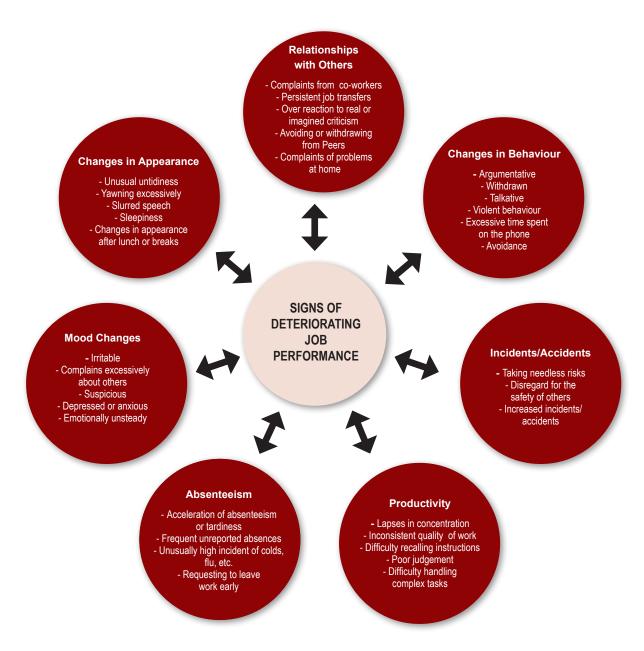
Reasonable Grounds Testing

If the supervisor or manager has reasonable grounds to believe that an employee is or may be unable to work in a safe manner because of the use of alcohol or drugs, then the supervisor or manager of that employee must request that he or she submit to alcohol and drug testing In the event that a level of management above this supervisor or manager is readily available, they must also be included in the decision.

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

Conducting Reasonable Grounds Testing

Reasonable grounds testing is done to eliminate the possibility of current substance use being the cause of observed behaviours that lead a supervisor to believe an employee is not fit to perform duties in a safe manner. Supervisors within Maximum Mechanical Services must be trained to observe signs that employees may be under the influence of drugs or alcohol and, when such signs are noticed, to request drug and alcohol tests.



MMS-HSE-MS-V.5 - September 7, 2022

Incident Testing

A supervisor or manager must request an employee to submit to an alcohol or drug test if the supervisor has reasonable grounds to believe that the employee, while at a Maximum Mechanical Services worksite, was involved in an accident, a near miss or other potentially dangerous incident and that the use of alcohol or drugs was a cause of the incident or there is no credible explanation as to how the incident occurred.

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

A supervisor or manager must make a request as soon as reasonably practicable following an incident.

A supervisor need not make a request if the supervisor concludes that there are reasonable grounds to believe that the use of alcohol or drugs did not cause the accident, near miss or other potentially dangerous incident.

Random Testing

At any worksite where Maximum Mechanical Services has confirmed in writing that each employee engaged in safety-sensitive work is covered by an EAP, the employer may implement a lawful computer-generated random alcohol and drug testing program in accordance with the procedures set out in the United States Department of Transportation (U.S. DOT) Workplace Drug and Alcohol Testing Programs in force as of the date of this publication. In the event a lawful random alcohol and drug testing program are to be adopted by Maximum Mechanical Services, a written notice shall be delivered to each employee and a written notice shall be provided to any bargaining agent of affected employees of the implementation of random alcohol and drug testing at least 30 days prior to implementation of that program at the worksite. Such notice shall outline the basic provision of the random alcohol and drug testing program.

Where an owner directly or by contract requires random alcohol and drug testing, such a random testing program must be applicable to all Maximum Mechanical Services employees and safety-sensitive employees at the worksite, to whom it can lawfully apply.

Pre-Employment/Site Access Testing

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

Documentation

Supervisors are responsible for monitoring and reporting to management any behaviour consistent with alcohol or drug use.

Supervisors or management who requests that an employee submit to an alcohol or drug test must complete, within a reasonable time of making the request, a report setting out the reason or reasons for making the request.

When a search is completed on an employee when there is reasonable grounds to believe they have alcohol and/or drugs in their possession, documentation must be kept to confirm whether or not the search came back positive or negative.

Consequences of Failure to Comply with the Alcohol and Drug Work Rule

Maximum Mechanical Services will discipline, or terminate for cause, the employment of an employee who fails to comply with the Alcohol and Drug Work Rule. The appropriate consequence depends on the facts of the case, including the nature of the violation, the existence of prior violations, the response to prior corrective programs and the seriousness of the violation.

Prior to Maximum Mechanical Services making a final decision with regard to disciplining or terminating the employment of an employee, who has failed to comply with the Alcohol and Drug Work Rule, Maximum Mechanical Services shall direct the employee to and the employee shall, meet with a substance abuse expert. The substance abuse expert shall make an initial assessment of the employee and make appropriate recommendations. The assessment by the substance abuse expert shall be applied utilizing the processes and approaches set out in the Discipline Policy included in this manual.

The employee shall, through the substance abuse expert, provide to Maximum Mechanical Services a confidential report of his or her initial assessment and recommendations. Maximum Mechanical Services shall then make the final decision. The initial assessment is to be completed as soon as possible, and the report shall be delivered to Maximum Mechanical Services within two days of completion.

Failure by the employee to attend the assessment or follow the course of corrective or rehabilitation action shall be cause for termination of the employee. During the period of assessment and corrective rehabilitative programs recommended by the substance abuse expert the employee shall be deemed to be suspended from his or her employment without pay.

- In addition to disciplining or terminating for cause the employment of an employee who fails to comply with the Alcohol and Drug Work Rule, Maximum Mechanical Services may give written notice to that person that the person will not be re-employed again by Maximum Mechanical Services unless the person provides the company with: a certificate issued by either:
 - i. the rehabilitation program service provider certifying that the person who was terminated has successfully completed the rehabilitation program and continues to comply with all the requirements of the rehabilitation program, or
 - ii. a licensed physician with knowledge of substance abuse disorders certifying that the person who was terminated is able to safely perform the duties he or she will be required to perform if employed by Maximum Mechanical Services, or
 - iii. a substance abuse expert or program case manager, as well as aa statement signed by the person and acknowledging that the person agrees to any conditions imposed as part of a corrective rehabilitative program and such other reasonable conditions set by Maximum

Mechanical Services. Maximum Mechanical Services may terminate the employment of the employee who fails to comply with the conditions set out in such statement.

Should Maximum Mechanical Services decide to discipline or terminate for cause the employment of an employee who failed to comply with the Alcohol and Drug Work Rule, Maximum Mechanical Services, as the owner of a site, where a person was working when he or she failed to comply with the Alcohol and Drug Work Rule, may give the person who failed to comply with the Alcohol and Drug Work Rule, written notice that he or she shall not enter the owner's site.

Owner Responses to Violations

The owner of a site where a person was working when he or she failed to comply with the Alcohol and Drug Work Rule may give the person who failed to comply with the Alcohol and Drug Work Rule written notice that he or she shall not enter the owner's site.

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

- a company engaged in work at the owner's site, or
- a company engaged in work at the owner's site:
 - provides the owner with a written statement by the person who has been denied permission to enter the owner's worksite acknowledging that the person agrees to reasonable conditions imposed by the owner or the contractor or to participate in a corrective or rehabilitative program.

The owner of site may withdraw permission given if the person given permission to enter the owner's worksite if the employee fails to comply with the Alcohol and Drug Work Rule or any condition imposed for the site.

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

Employee acceptance of Alcohol and Drug Program

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

Collection of Specimens and Analysis Procedure

Alcohol and drug testing is conducted to determine the presence of any drugs listed in the Concentration Limits Table-Testing Guidelines found in this section.

- 1. Employees will be asked to provide a sample at a designated collection site or representatives from the collection agency may visit the worksite to collect samples and perform screening tests.
- 2. The designated collection agency will collect and process urine specimens or saliva specimens for testing. Alcohol testing will be performed with an approved Evidential Breath Testing technician and device.
- 3. The laboratory selected by the designated collection agency must meet the guidelines and standards of Health Canada, which is the certifying agency for forensic urine drug testing laboratories in Canada and the United States. Laboratory testing processes follow the U.S. DOT standards guidelines.
- 4. Following proper chain of custody, an accredited laboratory will perform the required testing procedure for confirmation of screening results when required with confirmed test results being forwarded to a Medical Review Officer (MRO).

Alcohol and Drug Testing Results

Alcohol and drug test results can be negative, positive, refusal to test or cancelled with additional comments as required.

- A negative test result means the employee is in compliance.
- A positive test result means non-compliance.
- A refusal to test result means non-compliance.
- A cancelled test result cannot be relied upon to determine compliance or non-compliance.

All test results will be provided in a confidential written report from the medical review officer to the designated Maximum Mechanical Services representative with explanation and direction when required.

All test results will be provided in a confidential written report to the DER.

A result from the designated collection agency to the DER that the employee's sample produced a negative test result means that the employee complied with the Alcohol and Drug Work Rule. The DER must notify the employee of the negative test result and that no other steps under this Alcohol and Drug Program will be taken.

A positive test result means that the employee failed to comply with the Alcohol and Drug Work Rule. Unless the MRO has determined that there is a legitimate medical explanation for the positive test result, the positive test means the employee failed to comply with the Alcohol and Drug Work Rule.

If the employee's sample has been tampered with, this means that the employee failed to comply with the Alcohol and Drug Work Rule.

Return to Work After Positive Test

An employee will not be returned to the duties of their position until they have been evaluated by a SAE, complied with recommended rehabilitation and have a negative result of a return-to-duty drug and alcohol test. The employee must provide a written report to the DER verifying the required evaluation, recommendation, and rehabilitation, and provide documentation of the required information.

Follow-up testing to monitor the returning employees will be conducted depending on the SAE's recommendations.

Confidentiality

In order to preserve the confidentiality of test results, the designated Maximum Mechanical Services representative and any person to whom disclosure is permitted under Maximum Mechanical Services' alcohol and drug program must not disclose the test results to any person other than a person who needs to know the test results to discharge an obligation under Maximum Mechanical Services's application of this alcohol and drug program.

Testing Records

Upon request Maximum Mechanical Services will provide the site owner/client with verification of compliance with this program while adhering to freedom of information and protection of privacy and human rights legislation.

Records will be kept confidential and at a secure location at Maximum Mechanical Services' main office.

Appendix 1 - Guide for Identifying Safety Sensitive Positions

The following information is intended to help Maximum Mechanical Services clearly identify safety-sensitive positions. This is critical to ensure Maximum Mechanical Services effectively fulfils section 1.0 of the Canadian Model policy, which stipulates that employers should clearly articulate, and update from time to time, the following:

- Where the policy will apply, in specific terms (including Maximum Mechanical Services workplaces, other worksites, Maximum Mechanical Services vehicles, other vehicles, etc.).
- When the policy will be in effect (including pre and post-workday tasks and activities, Maximum Mechanical Services social events both during or outside of the workday, etc.).
- To whom the policy will apply, in terms of classifications, occupations or designated individuals.

The information below provides general principles and an example methodology as a guide for Maximum Mechanical Services to use in identifying and articulating where and to whom the Maximum Mechanical Services Alcohol and Drug Program and the Canada Model policy will apply.

It is incumbent upon the senior management to assign this task to qualified and experienced personnel so that the risk management benefits of a strong alcohol and drug policy are in balance with the incremental logistics and responsibilities imposed on the people working on safety-sensitive sites. The methodology used and decisions made must be reasonable and defensible. The principles and examples that follow can assist in meeting these objectives.

Maximum Mechanical Services may choose to use an assessment methodology other than that outlined below. Note that alternate identification of safety-sensitive positions must meet the same levels of thoughtfulness, reasonableness and defensibility.

The deliverable from this exercise should be a clear summary of where and to whom the policy will apply. It should be readily understood by all employees, supervisors, managers, contractors and regulators. For instance, a table similar to the one shown as Table C-1 of this section, can effectively communicate where and to whom the policy will apply to (employees, contractors, etc.).

Table C-1 – Example of Safe	etv-Sensitive Positions	and Designated Individuals

	Site Access Testing	Reasonable Cause Testing	Post-Incident Testing	Random Testing
Non-Safety-Sensitive Positions	N	Y	Y	NA
Safety-sensitive position categories: Electrical Trades Operators Non-destructive Testing (NDT) Technicians Pipefitter Trades 	Y	Y	Y	Y
Safety-sensitive positions - Designated individuals {Employee Name} {Employee Name} 	Y	Y	Y	Y
Risk-sensitive positions - Designated individuals {Employee Name} {Employee Name} 	Y	Y	Y	Y

Safety-sensitive and Risk-sensitive Positions

Safety-sensitive positions, in the context of the Canadian Model, are those where the employee has a key and direct role in an on-site operation where performance limitations (i.e., due to substance use) could result in an incident or near miss with the potential for high consequences (i.e., significant property damage, environmental damage or negative impact to reputation, and/or serious injury or fatalities to employees or the public). No risk-mitigating measures warrant reclassification of these positions – although the likelihood may be reduced, the potential for high consequences still exists.

Risk-sensitive positions, in the context of the Canadian Model, are a subset of safety-sensitive positions. They include supervisors, technical experts, etc. who reside off-site but make safety-critical decisions and direct on-site employees conducting potentially dangerous tasks in potentially dangerous work environments. Performance limitations (i.e., due to substance use) could result in an incident or near miss as described above. Like safety-sensitive positions and individuals, risk-sensitive positions and individuals should be clearly identified.

Safety-sensitive Assessment Tool

The matrix shown in Table C-2 of this section illustrates a logical framework that can be used as a safetysensitive assessment tool for on-site positions. While Maximum Mechanical Services should adapt the matrix to their own circumstances, including work activities and environments consistent with their operations, care should be taken not to reduce the severity of the activities and environments currently represented in the table. In evaluating a particular position, take the following into account:

- Work Environment: Consider the highest risk or hazard exposure related to the work environment in which the work activities will be performed, as well as the highest consequence environment or location where an employee may perform work, even if it is done on an infrequent basis.
- Work Activities: Consider the highest consequence activity or task that will be undertaken by an employee, even if it is done on an infrequent basis.

By industry agreement, all construction sites, all maintenance or turnaround sites and the activity of driving are considered safety-sensitive environments.

Note that there are no positions that should be described as "potentially safety-sensitive." This grey zone on the matrix illustrates that some positions lie near the boundary between safety-sensitive and not safety-sensitive. Thoughtful evaluation of these positions is necessary in order to designate them one way or the other. If any doubt exists, it is appropriate to take a conservative approach and designate the position as safety-sensitive.

Use the following Table C-2 or an equivalent methodology to identify positions that are safety-sensitive or risksensitive. Summarize safety-sensitive positions and risk-sensitive positions (if any) to identify applicability of the Canadian Model.

				Work Ac	tivities - Exposure	to Risks	
			A1	A2	A3	A4	A5
			 Office-based admin, computer support Non-third-party camp accommo- dation and meal services 	 Site abandonment and remediation (no equipment decommissioning – low density of employees)\ 	 Seismic operation Construction operation and maintenance of plant equipment (smaller, lower energy equipment) On-site supervision and technical support above Non-third-party camp food prepa- ration 	 Drilling, completion and tie-in oper- ations Fracking oper- ations Well servicing operations Safety Watch, hot watch Heavy Equipment transport Heavy Lifts On-site supervision and technical support above 	 Construction, operation and maintenance of plant equipment (large, higher energy equipment – high density of employees) Plant Maintenance and tumarounds Commissioning/ Disassembly of large, higher ener- gy equipment On-site supervision and technical support of above
	E1	Non-operating locations					
to Risk	E2	Minor Risk Operations (identified hazards, low density of employees) • Brownfield site • Pipeline-right-of- way (ROW)	Non-Safety- Sensitive (typical circumstances)		Potentially Safety-Sensitive (Evaluate specific circumstances,		
Exposure	E3	Considerable Risk Operations Production facilities Pipeline compres- sor/pump stations			designate either safety-sensitive or non-safety-sensitive)		
onment - General Exposure to	E4	Major Risk Operations Rig sites, fracking sites Proximity to moving and/ or (higher) energized equipment Proximity to environmentally sensitive areas				Safety-Sensitive (typical circumstances)	
Work enviro	E5	Construction sites Turnaround sites			By Industry agreement, all construction sites, all maintenance or		
Work	E6	Driving (on company business)			turnaround sites and the activity of driving are considered safety- sensitive environments		
	E7	Remote Sites (long emergency response time) Working Alone					

Effective Date: Revision Date: Revision No.:

Appendix 2

Table E-1 Effects, Duration of Effects and Withdrawal Symptoms of Policy Drugs

	Effects	Duration	Withdrawal
Alcohol	Disinhibition, relaxation, slurred speech, distorted vision and hearing, talkativeness, depressed neural functions including reaction time, uncoordinated movement, unconsciousness, blackout, coma	Depends on weight, gender, age, time and other factors. Generally, excretion is one standard drink per hour	Symptoms include restlessness, shakiness, hallucinations, convulsions, anxiety, headaches, nausea, vomiting, confusion, insomnia, sweating
Marijuana (depressant, relaxant and hallucinogen)	Distorted sense of time, paranoia, magical thinking, short-term memory loss, anxiety, depression, rapid heart rate, increased blood pressure and breath rate, red eyes, dry mouth, increased appetite, slow reaction time	Oral: Five+ hours, delayed onset peaking at 1 to 3 hours Inhalation: 1/2 life 20 to 30 hours, peaks in blood within 10 minutes, effects peak at 30 to 60 minutes	Starts one to three days after cessation, lasts 4 to 14 days up to one month. Symptoms include irritability, anxiety, depression, anger, reduced appetite, insomnia
Cocaine (stimulant)	Energy, alertness, elevated mood, superiority, irritability, paranoia, restlessness, anxiety, decreased coordination, violent behaviour, dilated pupils, seizures, exuberant speech, increased heart rate and blood pressure	1/2 life: 0.5 to 1.5 hours Snorting: 15 to 30 minutes Smoking: Five to 10 minutes	Symptoms include sleep disturbance, fatigue, psychomotor agitation or retardation, increased appetite, depression
Opioids (including codeine, morphine, hydrocodone, hydromorphone, oxycodone, oxymorphone)	Relaxed dreamlike state, sleepiness, clouding of consciousness, decreased coordination, slurred speech, drowsiness, constipation, euphoria, difficulty breathing, headaches, dizziness and confusion	1/2 life: 2 hours, 90 per cent excreted in 24 hours. Single use performance deficits have been noted up to four to six hours	Symptoms include diarrhea, nausea, vomiting, cramps, chills, profuse sweating, abdominal pain, anxiety, panic attacks, muscle and joint pain, sweating
6-Acetylmorphine (heroin metabolite)	Initial rush of pleasurable sensation and euphoria followed by hours of sleepiness, dry mouth, heaviness in extremities, drowsiness, confusion, nausea, vomiting, itchiness, reduced cognitive functioning, heart and breath rate slowing	1/2 life: 0.6 hours (6-AM metabolite is used for detection and is in the body for several hours after single use) Euphoria: 45 seconds to several minutes Overall: 5 hours	Begins 5 to 12 hours after last dose. Flu-like symptoms, anxiety, sleep, gastrointestinal distress, goose bumps, aggression, paranoia, increased heart rate and high blood pressure. Symptoms peak after 36 to 72 hours and fade after five to 10 days
Phencyclidine (also known as PCP)	Altered perceptions of reality including visual and bodily perceptions, numbness and relaxation, slurred speech, odd erratic and unexpected behaviours	Oral: 5 to 8 hours Smoked or injected: 3 to 5 hours	Symptoms include decreased reflexes, weight loss, memory loss, confusion, anxiety, speech difficulties, depression, lack of impulse control, coma, suicide, death
Amphetamine/ methamphetamine (stimulant)	Euphoria, risk-taking, heightened self-esteem, tunnel vision, paranoia, hallucinations, headaches, increased breathing rate, shortness of breath, reduced appetite, increased sweating, irregular heartbeat, chest pain	1/2 life: 7 to 34r hours depending on urine pH Smoked or injected: Immediately Snorted or swallowed: Within 30 minutes	Symptoms include sleep disturbance, fatigue, psychomotor agitation or retardation, increased appetite, vivid and unpleasant dreams
Ecstasy (including MOMA, MDA)	Derealization, depersonalization, energy, empathy, impulsivity, euphoria, hallucinations, altered perception of space and time, hyperthermia, increased heart rate and blood pressure, nausea, blurred vision, chills/ sweating, faintness	3 to 6 hours. Deficits from light use can last after 20 to 40 days of abstinence	Symptoms include depression, insomnia, agitation, disturbances to concentration and memory, overheating, anxiety, loss of reality, paranoid delusions, panic attacks

Section 15 – Fit for Duty Program

Purpose

Maximum Mechanical Services is committed to ensuring that all individuals are fit for work while they are on Maximum Mechanical Services projects or undertaking activities on Maximum Mechanical Services' behalf.¹

This program will be communicated to all employees and other working on behalf of the company during safety orientation. It will also be posted in each office, facility or work area.

The Fit for Duty Program defines responsibilities of employees. The program promotes fitness for work and how to effectively and appropriately manage fitness for work issues including, but not limited to the following:

- Fatigue
- Stress
- Physical, emotional and mental well-being
- Medical issues
- Rehabilitation
- Alcohol and drugs

The intent of this program is to provide and promote a safe working environment by the following ways:

- Improving and maintaining fitness for work.
- Improving and maintaining an awareness of fitness for work responsibilities.
- Providing appropriate assistance to overcome problems that could impair fitness for work. If an employee is determined to be unfit for duty, Maximum Mechanical Services will provide reasonable assistance to the employee. This may include, but is not limited to, transferring the worker to another role or providing a leave of absence, etc.
- Monitoring compliance with, and enforcement of, this program and its procedures including the requirements of the Alcohol and Drug Program.
- Providing effective, fair and constructive procedures for dealing with people who are unfit for work.

This program is incomplete without the entirety of the HSE-MS manual. This program should be read and understood in conjunction with all other policies and procedures from the HSE-MS manual including the Alcohol and Drug Program, Fatigue Management, and any program, procedure or practice that requires personal assessment (i.e., Respiratory Protective Equipment fit testing, Disability Management, etc.).

¹ Alberta Occupational Health and Safety Act, Part 1 - Obligation of Employers, Section 3(2)

Definition

Fit for Duty – An Individual who is in a state (i.e., physical, mental and emotional) which enables them to perform assigned tasks competently and in a manner which does not compromise or threaten the safety or health of themselves or others.

Roles and Responsibilities

Senior Management

Senior management's responsibilities within the Fit for Duty Program include, but are not limited to the following:

- Lead by example by arriving at work fit for duty.
- Ensure a process is in place for the adoption and implementation of the Fit for Duty Program.
- Ensure a process is in place for supervisors to be trained in the implementation of the program.
- Supply adequate resources to meet the requirements of this program.
- Protect the fair and consistent application of this program.
- Ensure the appropriate procedures are implemented to safeguard sensitive medical information and other personal information.

Middle Management

Middle management's responsibilities within the Fit for Duty Program include, but are not limited to the following:

- Lead by example by arriving at work fit for duty.
- Adapt, implement, and apply all areas of this program.
- Confirm supervisors are trained in the implementation of this program.
- Protect the fair and consistent application of this program.
- Apply the appropriate procedures to safeguard sensitive medical and other personal information.
- Monitor employees for unsafe behaviours and take prompt and appropriate action whenever they believe that any employee is not capable of working in a safe and effective manner, up to and including removing them from the worksite, if necessary.

Supervision

Supervision's responsibilities within the Fit for Duty Program include, but are not limited to the following:

- Lead by example by arriving at work fit for duty.
- Lead the effective implementation of this program including raising concerns about other employee's fitness for work.

• Conduct an assessment of the fitness for work of employees both at the start of, and throughout, the workday.

Take prompt and appropriate action to evaluate if an employee is not capable of performing their duties in a safe and effective manner, up to and including removing them from the worksite if necessary.

Take all necessary actions to safeguard sensitive medical information and other personal information.

Employee

Employee's responsibilities within the Fit for Duty Program include, but are not limited to the following:

- Be fit for work to avoid adversely affecting the health and safety of themselves or any other employee.
- Demonstrate that they are fit for work if they are requested by management or supervision.
- Report any actual or potential impairment of fitness for work or breaches of non-compliance with this program.
- · Report to their supervisor if they believe they may be unfit for work.
- Inform their supervisor if they are taking any medication (i.e., prescription or over the counter) which may have an adverse effect on their ability to work safely, have a medical condition, or have a personal illness that could have an impact on fitness for work.
- Provide a medical certificate or release when applicable. This may include a physician's assessment of the impact of any or all medication on fitness for work.
- Demonstrate they are competent/qualified, and physically capable to perform their job.

Subcontractors

Subcontractors' responsibilities within the Fit for Duty Program include, but are not limited to the following:

- Be fit for work to avoid adversely affecting the health and safety of themselves or any other employee.
- Demonstrate that they are fit for work if they are requested by Maximum Mechanical Services.
- Report any actual or potential impairment of fitness for work or breaches of non-compliance with this program.
- Report to Maximum Mechanical Services, if they believe they may be unfit for work.
- Inform Maximum Mechanical Services, if they are taking any medication (i.e., prescription or over the counter) which may have an adverse effect on their ability to work safely, have a medical condition, or have a personal illness that could have an impact on fitness for work.
- Provide a medical certificate or release when applicable. This may include a physician's assessment of the impact of any or all medication on fitness for work.
- Demonstrate they are competent/qualified, and physically capable to perform their job.

Assessment

Methods include:

- Face to face discussions with Supervisors and employees at the start of, and during, the work period
- Medical assessments
- Alcohol and drug testing
- Other recognized assessments as appropriate

Impact to Fitness to Work

Alcohol and Drug

Maximum Mechanical Services expects all of its employees to report to work fit for duty and in good mental and physical condition. No employees will be allowed to enter or remains at the worksite while under the influence of drugs and/or alcohol.

Fatigue

Maximum Mechanical Services expects all of its employees to have an understanding of their needs to prevent themselves from being fatigued, such as determining how much sleep is needed to feel refreshed and healthy the next day.

Injury or Illness and Return to Work

Maximum Mechanical Services will ensure that when an employee returns to work after a fitness for work issue, they are medically certified stating that they are physically and/or psychologically capable of carrying out their assigned duties. An injury management and return to work plan shall be implemented if return to work issues are identified and supported by appropriate medical opinion. *(see Disability Management section)*.

Work Hazards

Fitness for work considerations shall include both risks inherent in the work itself and other reasonably foreseeable hazards that may be associated with, but not directly involved in, the work (i.e. weight and/or fitness issues associated with emergency evacuation requirements).

Work Periods

All employees are required to adhere to regulatory standards and jurisdictional legislation for work hours, workdays, periods of rest, days of rest and commercial vehicle hours of service for federal transportation as applicable.²

² Alberta Employment Standards - Hours of Work and Rest

Fatigue minimization shall be included when setting work shift patterns. In particular, required breaks between employee work shifts and between sequences of work shifts shall be incorporated.

Section 16 – Fatigue Management

Purpose

The purpose of the Fatigue Management program is to inform employees of what fatigue management is and how to recognize it, as well as how to control it through work/personal habits and fatigue reporting.

Definitions

Fatigue – The feeling of extreme tiredness or exhaustion causing increased difficulty in performing mental or physical activities or tasks.

Circadian Rhythm – The natural pattern of physiological and behavioural processes within a 24-hour period. It includes the body's sleep and wake cycles, body temperature, blood pressure and release of hormones.

Sleep-Wake Cycle – Biological pattern of alternating sleep and wakefulness. In humans this is roughly eight (8) hours of nocturnal sleep and sixteen (16) hours of daytime activity.

Roles and Responsibilities

Senior Management

Senior management's responsibilities within the Fatigue Management program include, but are not limited to the following:

- Lead by example by arriving at work well rested.
- Ensure a process is in place for the adoption and implementation of the Fatigue Management program.
- Ensure a process is in place for supervisors to be trained in the implementation of the program.
- Supply adequate resources to meet the requirements of this program.
- Protect the fair and consistent application of this program.

Middle Management

Middle management's responsibilities within the Fatigue Management Program include, but are not limited to the following:

- Take into account the employee's needs regarding fatigue, industry requirements and competitiveness when creating a work schedule. The schedule will be cost efficient, both directly (labour costs) and indirectly (absenteeism, turnover, incidents), and effective in terms of how employees adjust to their schedule.
- Verify supervisors are trained on how to recognize fatigue and how to prevent it or counteract it.

Supervision

Supervision's responsibilities within the Fatigue Management program include, but are not limited to the following:

- Investigate reported incidents of employees working while fatigued.
- Understand and be able to recognize fatigue and its symptoms.
- Enforce the Fatigue Management program.
- Evaluate each task periodically for fatigue hazards such as work type, length of task and workplace conditions to minimize fatigue.
- Set work hour limitations.
- Set a job rotation, if required.
- Consider rest periods between workdays, shifts or on-call time when assessing an employee's fatigue.

Employee

Employee's responsibilities within the Fatigue Management Program include, but are not limited to the following:

- Immediately report it to their supervisor when feeling fatigue.
- Never operate any vehicle or equipment when feeling fatigued.
- Have an understanding of their own needs to prevent themselves from being fatigued, such as determining how much sleep is needed to feel refreshed and healthy the next day.

Subcontractors

Subcontractors responsibilities within the Fatigue Management Program include, but are not limited to the following:

- Immediately report it to Maximum Mechanical Services when feeling fatigue.
- Never operate any vehicle or equipment when feeling fatigued.
- Have an understanding of their own needs to prevent themselves from being fatigued, such as determining how much sleep is needed to feel refreshed and healthy the next day.

Assessment of Fatigue

Supervisors who suspect that an employee is too fatigued to perform their work safely, will conduct an employee Fatigue Hazard Assessment. Questions that will be asked to determine an employee's level of fatigue could be:

• How many hours did the employee work in the past week?

- What is the pattern of hours worked in the past week?
- Do environmental factors pose an additional work load?
- Does the employee's condition match the mental, physical, and emotional demands of the work?
- What is the physical intensity of the work?
- Does the employee's physical fitness match the work demands?
- Is the employee required to work at a time out of sync with the sleep-wake cycle of the employee's circadian rhythm?
- Is the employee experiencing life stressors outside of work?
- How well has the employee coped with stress in the past?
- Does the employee get support at work and at home?

Components of Managing Fatigue

Recognizing Fatigue and Symptoms

Acute fatigue is caused by immediate episodes of sleep deprivation such as long periods of wakefulness from excessively long shifts or night shifts without adequate daytime rest.

Ongoing sleep disruption can lead to sleep depth and chronic sleep deprivation which results in:

- Muscular weakness
- Tiredness in everyday activities
- Reduced coordination and alertness

Fatigue can also result in long-term health problems such as:

- Digestive problems
- Heart disease
- Stress
- Mental illness

Personal Limitations Caused by Fatigue

- The chance of incidents increases
- Regular absenteeism increases
- Tendency to work at a slower pace
- Tendency to rely on others to get tasks completed

Hazards of Working While Fatigued

- Inability to see properly.
- Slower reflexes and reactions.
- Micro-sleeps (up to 60 seconds where the brain goes to sleep and the employee blacks out no matter what they are doing).
- Automatic behaviour (where the employee does routine tasks but is not having any conscious thoughts).
- Inability to make good decisions or plans.
- Inability to solve problems.
- Inability to concentrate, including wandering thoughts.
- Decreased alertness and watchfulness.
- Inability to remember activities just completed, seen or heard.
- Inability to notice details the employee normally would.
- More mistakes than usual.
- Failure to respond to changes in surroundings or situations.
- Poor logic and judgment, including taking risks the employee normally would not take.
- Inability to respond quickly or correctly to changes.
- Inability to communicate well.
- Inability to handle stress.
- Moodiness.

Controlling Fatigue

Besides not getting the appropriate amount of sleep, fatigue can also be caused by worksite factors such as:

- Work scheduling
- Work task type and length
- Employee health and stress
- Worksite safety culture
- Shift Work

Shift work is sometimes more favourable on certain worksites, but shift work also effects a person's circadian rhythm which can disrupt their sleeping pattern resulting in fatigue.

When creating a schedule, Maximum Mechanical Services will take into account strategies to try to help make shift work less intrusive to natural sleep habits and social activities. Some of these strategies include:

• Having the shift end at a time when the shift employee can still get sleep during "normal" sleep

time. (i.e., 10 am -6 pm; 6 pm - 2 am).

- Staggering the length of the shift (i.e., Day shift-10 hours, Afternoon shift-8 hours, and night shift only 6 hours).
- During an employee's shift, Maximum Mechanical Services will provide sufficient breaks to allow for rest and recovery.
- Collecting input from employees to determine what they find easier to adjust to.

It is important for employees to have quality time off. For that reason, consecutive days off are ideal. Work schedules involving night shifts must designate recovery time into the off-duty pattern so there is sufficient opportunity for rest and recuperation following the night shift.

Training

Employees and supervisors are to be provided training on fatigue management including how to recognize fatigue, how to control fatigue through appropriate work and personal habits and fatigue reporting.

Section 17 – Disability Management Program

Purpose

The purpose of the Disability Management Program is to emphasize a proactive approach to reducing injuries and maintaining a safe and healthy working environment. Maximum Mechanical Services recognizes that its most highly valued resource is its employees. The Disability Management Program is designed to provide continued employment to injured employees in a joint effort to eliminate interruptions of earnings, without aggravation or delays to a full recovery, allowing the employee to return to their pre-injury position.¹,

This program will also be communicated to all employees and others working on behalf of Maximum Mechanical Services including to new employees during safety orientation for new employees.

Definitions

First Aid Incidents – A work related incident that typically does not require attention from a health care professional. First aid incidents include those where an individual visits a health care professional solely for:

- Observation
- Non-prescription medication
- Wound covering
- Removal of foreign bodies from a wound (uncomplicated)
- Removal of foreign bodies from an eye via irrigation or cotton swab,
- Treatment of 1st degree burn, hot or cold therapy
- Diagnostic test (i.e. x-ray, blood test)
- Issuance of a non-rigid means of support
- Use of temporary immobilization devices (i.e. sling)
- Use of eye patches
- Use of finger guards
- Tetanus immunization
- Cleaning of a wound on skin surface
- Drilling a nail to relieve pressure
- Drinking of fluids to relieve heat stress
- Massage (except when prescribed by a health care professional)

¹ Alberta Workers' Compensation Policies, Chapter 04 - Benefits, Doc - 04-05 - Return-to-Work, Part II

Injury – Any cut, fracture, sprain, amputation, loss of consciousness, etc. which results from an exposure involving a single event (or number of linked events close together in time) in the work environment. Injuries are caused by essentially instantaneaous. Note that conditions resulting from an animal or insect bite, or from one-time exposures to chemicals, are considered to be injuries. Work-related events, including overexertion that aggravates a pre-existing condition are deemed to be injuries.

Illness – An illness is any abnormal condition or disorder, other than one resulting from an injury, caused by exposure to environmental factors associated with employment.

Lost Work Cases (LWC) – Lost workday case is a work-related injury that causes the injured person to miss work and is temporarily unable to perform any regular job or restricted work activity. Lost workday does not include regular scheduled days off (i.e., normal days off, holidays) or the day on which the injury occurred. In cases where employment has been terminated, this would include any workdays lost that had been previously scheduled, or any estimate of workdays that would be lost after termination. A single incident can result in several lost workday cases, depending on how many people were injured in the incident.

Lost Workdays – The number of lost workdays is the total number of scheduled workdays on which the injured person missed work and is temporarily unable to perform any regular job or restricted work activity. Lost workday workdays will continue until the employee return to work. If the incident reoccurs and the contract has been terminated, the number of days to be counted as lost work days will be estimated based on the medical condition of the injured employee at the time of termination.

Medical Treatment Cases (MTC) – Medical treatment is the management and care of a patient for the purpose of managing an injury. Medical treatment does not include the following:

- Visits to a physician or other licensed health care professional solely for observation or counselling.
- Diagnostic procedures such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes (i.e., eye drops to dilate pupils).
- "First Aid" as defined in this section.

Restricted (Modified) Work Case (RWC) – Restricted (modified) work occurs when, as the result of a work-related injury the following occurs:

- The supervisor restricts the employee from performing one or more of the routine functions of their job, or from working the full workday that they would otherwise have been scheduled to work (non recordable).
- A physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of their job, or not work the full workday that they would otherwise have been scheduled to work (recordable).

Restricted Workdays – The number of restricted workdays is the total number of scheduled workdays on which the injured person was temporarily unable to perform all normally assigned work functions. Restricted

workdays will continue until the employee is declared fit to return to normal work. If the incident reoccurs and the contract has been terminated, the number of days to be counted as restricted work will be estimated based on the medical condition of the injured employee at the time of termination.

Roles and Responsibilities

Senior Management

Senior management's responsibilities within the Disability Management Program include, but are not limited to the following:

- Support the program by providing financial and administrative support to the program, if required.
- Protect the fair and consistent administration of this program.
- Ensure a process is in place for the adoption and implementation of the disability management program.

Middle Management

Middle management's responsibilities within the Disability Management Program include, but are not limited to the following:

- Oversee the operation of the program.
- Protect the fair and consistent administration of this program.

Inform employees that the Workers' Compensation Board (WCB) encourages the use of disability management programs for employees who are injured at work.

- Ensure a process is in place for supervisors to be trained in the implementation of this program (WCB employer information seminars and workshops).
- Provide expertise in case management issues.
- Ensure the Employee's Report of Injury is submitted to WCB once received from employee.

Supervision

Supervision's responsibilities within the Disability Management Program include, but are not limited to the following:

- Train employees so that they are aware of the Disability Management Program.
- Encourage employees to know that in an event of an injury or illness that every effort will be made to preserve the employment of the employee with consideration for the medical restriction as a result of the injury or illness.
- Inform employees that suitable work will be made available to them in the event of an injury, within the limitations of the injury as indicated by the attending physician.

Employee

Employee's responsibilities within the Disability Management Program include, but are not limited to the following:

- Keep all medical appointments pertaining to a workplace injury or illness.
- Return medical documentation after each medical appointment to designated claim manager.
- Keep their supervisor informed of any changes in treatment or medical appointments.
- Communicate to the physician that modified (light duty) work is available and with the physician's approval, participate in the disability management program.
- Present the Maximum Mechanical Services Disability Management Programs report form to the physician and return the completed form along with the WCB physician's first report to Maximum Mechanical Services.
- Provide medical information, which will be handled confidentially by Maximum Mechanical Services to support the return to work process after an injury.
- Complete and submit any employee report to WCB, or submit to management for Maximum Mechanical Services to submit to WCB on the employee's behalf.

General Requirements

Before an employee can be considered for the Disability Management Program, the following conditions must be met:

- A physician must authorize the return to work.
- The work must be productive and meaningful.
- The work must not aggravate the employee's condition.
- The duration of the Disability Management Program must be well defined.
- The employee must not exceed their modified work limitations.

The program objectives and guidelines are based on the following:

- Safety will take precedence over expediency.
- Each employee will have access to this program and, to the best of their ability, will take an active part in making it successful.
- Individual employees are responsible for their safety and the safety of their fellow employees.
- Each employee has the obligation to refuse any unsafe work.

Modified Work Offer

Modified work assists in the rehabilitation and early return to work of ill or injured employees. Maximum Mechanical Services will provide suitable, temporarily restricted work to any employee unable to perform their regular duties. This may mean modifying the employee's original position, providing an alternative position,

or providing different training. Only work that is considered to be meaningful and productive to Maximum Mechanical Services will be considered as modified work within the Disability Management Program.²

Maximum Mechanical Services should keep an up to date list of all jobs performed at its various sites. These jobs should have an associated physical demands analysis (PDA). The PDA will determine what jobs can be performed as per the doctor's work restrictions provided by an employee's physician.

A written offer of modified work will be presented to the employee. The offer will include specific job duties to be performed in accordance with medical restrictions. The offer is to be signed by the employee and supervisor and then forwarded to the WCB. The modified work offer will include the following:

- Specific duties to be performed
- Rate of pay
- Hours of employment (these are important in case the hours may change from previous work performed)
- Length of placement (this will be documented and made clear to the employee)

Monitoring Modified Work

Once an employee has been placed on modified duties, their progress will be monitored by management or supervision. The employee will keep all medical appointments and follow all medical instructions. All physiotherapy, chiropractor and practitioner appointments should be arranged before or after working hours or as close to the beginning or end of the shift as possible.

Refusal of Modified Work Offer

Refusal by an employee to participate in modified work will be dealt with immediately by interviewing the employees and recording the reason for not accepting the modified work offer.

If the employee rejects the offer the supervisor will remind the employees that their benefits under the WCB could be suspended.

Lost Time Injuries

If, based on medical recommendation, an employee is unable to return to work after sustaining a worksite injury based on medical recommendation, the supervisor should contact the employee at least once a week to check on their general condition. The nature of the treatment the employee is receiving, which medical service provider they are seeing, and the date of all medical appointments must be communicated to management. All such contact with the employee must be documented.

² Alberta Workers' Compensation Policies, Chapter 04 - Benefits, Doc - 04-05 - Return-to-Work, Part II

Record Retention

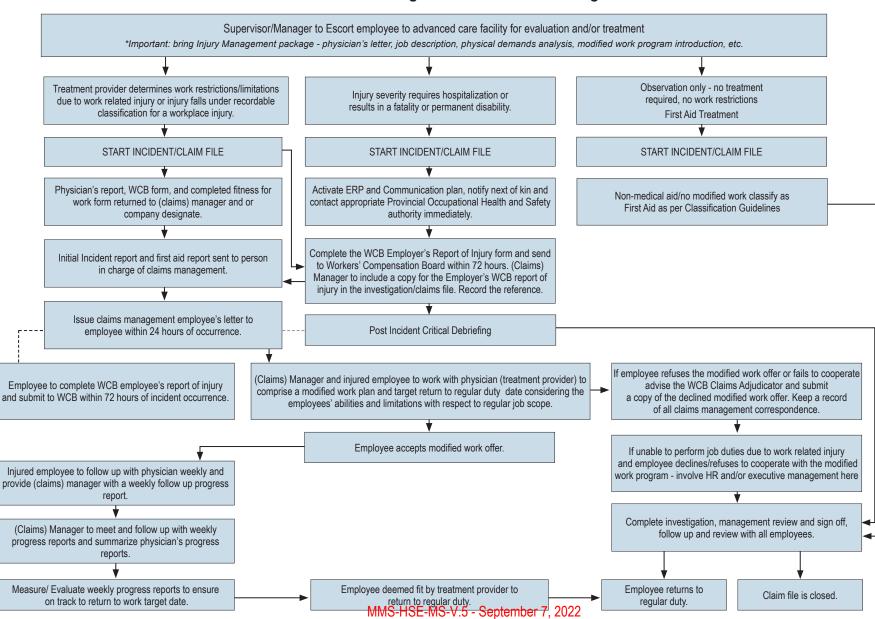
An accurate written modified work agreement and all supporting documentation are to be maintained for a period of three (3) years from the date of the injury or illness.

Access to this information will comply with the provincial *Freedom of Information* and *Protection of Privacy Act* (FOIP) and federal - *Personal Information Protection and Electronic Documents Act.*

Process Flow Diagram

The Disability Management Program flow diagram for internal management WCB claims is shown below.

MAXIMUM MECHANICAL SERVICES



WCB Claim Management Internal Flow Diagram

Effective Date: Revision Date:

Revision No:

Section 18 – Environmental Management Program

Purpose

The purpose of this Environmental Management Program is to achieve the appropriate protection of humans, animals, plant life, air, water, and soil while completing operations. Maximum Mechanical Services expects all employees to take appropriate, preventative steps to eliminate harm to the environment. Environmental protection is everyone's responsibility.

Maximum Mechanical Services will follow industry recommended environmental standards and government legislation.

Definitions

Spill – Discharge of a pollutant into the natural environment from, or out of, a structure, vehicle, equipment or other container which is abnormal in quality or quantity.

Waste – Unwanted materials (solid, liquid or gaseous) that results from human, domestic or industrial actions.

Roles and Responsibilities

Senior Management

Senior Management's responsibilities within the Environmental Management Program include, but are not limited to the following:

- Lead by example by following the protocols of the Environmental Management Program.
- Ensure a process is in place for the adoption and implementation of the Environmental Management Program.
- Ensure a process is in place for supervisors to be trained in the implementation of the program.
- Supply adequate resources to meet the requirements of this program.
- Protect the fair and consistent application of this program.

Middle Management

Middle Management's responsibilities within the Environmental Management Program include, but are not limited to the following:

- Lead by example by following the protocols of the Environmental Management Program.
- Adapt, implement, and apply all areas of this program.
- Confirm supervisors are trained in the implementation of this program.

- Protect the fair and consistent application of this program.
- Supply adequate resources to meet the requirements of this program.
- Stay updated with applicable environmental regulations.
- Evaluate and monitor environmental performance to applicable standards.

Supervision

Supervision's responsibilities within Environmental Management Program include, but are not limited to the following:

- Comply with and enforce the Environmental Management program.
- Intervene and stop activities that will involve a known or implied deviation from laws, regulations, and Maximum Mechanical Services or client policies, standards, procedures, work instructions or contractual requirements regarding the environment.
- Ensure that due diligence is exercised during risk assessments and the development of prevention and mitigation measures.
- Inspect and evaluate the environment, equipment and processes in working areas to ensure compliance with safety regulations and industry standards.
- Stay updated with applicable environmental regulations.
- Work with emergency response team to address environmental incidents such as chemical leaks and spills.

Employee

Employee's responsibilities within Environmental Management Program include, but are not limited to the following:

- Comply with the environmental management program.
- Know and understand the environmental requirements to safely perform your tasks and protect the environment.
- Wear all required PPE and follow applicable SDS.
- Notify a supervisor of any risks so they are identified and managed appropriately .

Subcontractors

Subcontractors' responsibilities within the Environmental Management Program include, but are not limited to:

- Comply with the environmental management program.
- Know and understand the environmental requirements to safely perform your tasks and protect the environment.

- Wear all required PPE and follow applicable SDS.
- Notify Maximum Mechanical Services of any risks so they are identified and managed appropriately.

Program Initiative

Maximum Mechanical Services' Environmental Management Program consists of objectives, such as:

- Protecting the environment by limiting the amount of greenhouse gases by use of low-emissions technologies, driving less, carpooling and using renewable energy.
- Maintaining vehicles and equipment to ensure they will be kept in good condition.
- Ensuring vehicles are not left idling unnecessarily.
- Using the most efficient vehicles and equipment and using alternative fuels when possible.
- Minimizing the local animal or plant population or habitat that may be affected by the company work activities and having a plan in place to minimize any environmental impact to them.
- Taking into consideration the impact a product has on the environment and purchasing products which have the least impact the environment (i.e., made of recycled/renewable material, energy efficient, etc.).
- Utilizing an efficient material management system to reduce the impact on the environment by limiting the amount of materials that are used, left over as waste or transported.
- Using the following energy conservation measures whenever possible:
 - Shut down equipment when not in use.
 - Use energy efficient light bulbs.
 - Use new energy efficient technology.
 - Use equipment with the ENERGY STAR mark.
- Using water conservation measures whenever possible. This can include repair on any equipment leaking water, use of a broom instead of a hose for cleaning purposes, upgrading equipment efficiency, and educate employees.
- Following industry best practices in the handling and disposal of refrigerants.

Training and Education

Providing employees with training and education, through the following:

- Orientation
- WHIMIS 2015
- Transportation of Dangerous Goods (TDG)
- Hazard Assessment and Control

- Daily Worksite Meetings
- Safety Meetings
- Safety Bulletins
- Requirements of handling and disposal of wastewater and waste generated at the worksite.
- Employees must be instructed on the proper response procedures for spilled materials. The training should include materials available for use, proper waste disposal, and communication procedures.
- Training may be performed in-house or by a third-party.

Spill Prevention

One aspect of the Environmental Management Program is to reduce the risk for an environmental spill. Material spills or releases require prompt attention to minimize or eliminate harmful or undesirable effects on the environment. In the event of an environmental spill, the emergency response procedures and contingency plans will be put into effect.

A proper spill kit must contain the appropriate supplies for materials that may be spilled. Supplies must be easily accessible when required, and considerations must be made for both the type and quantity of materials.

Maximum Mechanical Services should ensure the availability of adequate spill response supplies by periodic inspection to assess their availability and adjust inventory as necessary.

Waste Management

Every attempt will be made to minimize production of nonhazardous waste through recycling, reuse, and waste minimization initiatives. Waste that is generated during the project will be estimated at the pre-job meeting and proper bins, storage and disposal will be coordinated with site owners to guarantee proper handling. Site supervisors will verify that waste on their site is managed effectively following required legislation for handling and timely disposal and removal of waste containers to minimize the potential of overloading.

Maximum Mechanical Services will immediately notify the owner for further instructions in the event that Maximum Mechanical Services generates or encounters waste which may include, but is not limited to:

- Sewage
- Oilfield wastes (such as used muds or contaminated hydro test water)
- Hazardous wastes (such as used paint or waste batteries)
- Waste oil
- Solids, sludge, or other pollutants or materials not authorized by the owner for on-site disposal

Wastewater content should be known before discharging. If the contents of the wastewater are hazardous (toxic, corrosive, flammable etc.) the wastewater needs to be disposed of in a facility authorized to dispose of hazardous waste. Coordination with the project or site owner prior to disposal of wastewater is required to

ensure proper disposal and compliance with applicable permits.

Employees will be instructed in the proper handling, storage and disposal of non-hazardous wastes, trash, and scrap. Hazardous waste will be handled by properly trained personnel only.

Maximum Mechanical Services will comply with all applicable laws, regulations, permits and approval conditions, and requirements with respect to waste, including on-site storage. Maximum Mechanical Services will take appropriate steps to ensure that no waste is allowed to enter any watercourses, groundwater, wetlands, floodplain areas, or storm sewer systems.

All non-hazardous and non-toxic trash and normal garbage (i.e., paper, paper products, wood, plastic, glass and discarded food items) will be stored in closed, leak-proof storage bins. Maximum Mechanical Services is responsible for proper collection and storage of the trash and garbage and transportation to disposal or recycling facilities (i.e., sanitary landfill) approved by the regulatory authorities with jurisdiction and by the owner. Open (to the environment) burning and use of open (illegal) dumps is prohibited. Maximum Mechanical Services will comply with all applicable laws, regulations, permits and approval conditions, and requirements with respect to the collection, storage and disposal of the trash and garbage. Maximum Mechanical Services will make sure that no trash or garbage is allowed to enter any watercourses, groundwater, wetlands, floodplain areas, or storm sewer systems.

Construction wastes (such as spent metal, lumber, field joint materials, spent welding rods, etc.) will be minimized to the fullest extent possible. Maximum Mechanical Services will remove all construction waste on a continuous basis, disposing of the construction waste at a facility approved by the regulatory authorities having jurisdiction. Maximum Mechanical Services will comply with all applicable laws, regulations, permits, approval conditions, and requirements with respect to the disposal of the construction waste. No construction waste is allowed to enter any watercourses, groundwater, wetlands, floodplain areas, or storm sewer systems.

Storage

Maximum Mechanical Services will identify acceptable sites where items (i.e., hazardous waste, diesel fuel, gasoline, form oils, lubricating oils, propane cylinders, hydraulic fluids, oxygen cylinders, acetylene, glycol, and other environmentally damaging substances) are stored. Appropriate locations will also be identified for storing equipment when not in use (i.e., during nights or weekends). Such locations should be located in an area where a spill or leak would not affect a drainage area or watershed.

If Maximum Mechanical Services is performing specialty work in controlled areas, this must be identified with proper signage.

Waste should be recycled whenever practicable. Appropriate containers must be in place with proper signage to identify type and classifications of waste. Waste that may be recycled or reused must be identified. Chemical substances should be stored in proper containers to minimize the potential for a spill. Whenever possible, chemicals should be kept in closed containers and stored so they are not exposed to stormwater.

Gloves and/or other appropriate PPEwill be used and PPE signage will be included and in accordance to the WHMIS and applicable SWP and will be reviewed at daily toolbox/tailgate meetings.

Fuelling

The servicing and fuelling of equipment will not be permitted within thirty (30) meters of any watercourse of surface water drainage. All fuel storage tanks must be locked and secured when not in use. All vehicles and dispensing units over a 100-liter capacity (utilized for refuelling) will be equipped with automatic shut-off valves. In addition, all vehicles will comply with all applicable laws, regulations, permits and approval conditions, and requirements.

Spills and Environmental Incident Contingency Plans

An environmental incident is one which has caused, or has the potential for causing, one or more of the following:

- Environmental damage.
- Adverse impact on fish, wildlife, or other environmental resources.
- Heightened publicity associated with possible impacts on the environment.
- Legal action with respect to environmental non-compliance or damage.

Prior to construction or maintenance, contingency plans for environmental incidents, whose form and content is acceptable to owner, will be developed by Maximum Mechanical Services. These contingency plans include spill control and clean-up, erosion and sediment control, etc.

Maximum Mechanical Services will implement an Environmental Spill Response Program, including all aspects of clean-up, equipment requirements and method of application in the case of an accidental environmental spill or discharge.

Maximum Mechanical Services will design and implement an erosion and sediment control plan to control, contain and treat any surface water runoff prior to construction. Additional appropriate erosion and sediment control materials must be stockpiled on-site in the event of an accidental release of sediment-laden water.

Incident Reporting

Environmental incidents are investigated by management according to established procedures. Where required, management will provide access to resources for the investigation of environmental incidents. All incidents will be documented on the Incident Investigation Report form.

Any environmental incident or spill (including release or discharge) of any toxic or hazardous substance, or any substance that harms or may harm aquatic life (including fish and fish habitat), must be immediately reported to the authorities of the area of work. Additionally, any spill of a substance in excess of reportable quantities under the provincial Spill Reporting Regulation must also be immediately reported to the spill response authority for the area of work. Any spill, or imminent threat of a spill, of a deleterious substance (as

defined in the federal Fisheries Act) into water frequented by fish that harms or may harm fish or fish habitat, must be reported to both the Provincial Environmental Response line and Fisheries and Oceans department Canada regional number.

Maximum Mechanical Services will contact the site owner in all cases of an environmental incident or spill. Maximum Mechanical Services will expect government agencies to be contacted by the owner and will only contact agencies at the request of, or with the permission of, the owner. If the owner cannot be contacted in a timely manner and the incident requires immediate action, the government agencies will be contacted by Maximum Mechanical Services according to federal and provincial laws and regulations.

- In Alberta, call 1-800-222-6514 to report spills
- In British Columbia, call 1-800-663-3456
- In Saskatchewan, call 1-800-667-7525
- In Manitoba, call 204-944-4888
- In Ontario Toll Free: 1-800-6060
- Fisheries and Oceans Canada 1-800-465-4336

Maximum Mechanical Services, in coordination with the client, is responsible for the following procedures:

- Take immediate action to stop the problem at the source, minimize environmental consequences, and manage resolution of the incident.
- Assess the causes of the environmental impacts and gather information so that prevention of future incidents can be developed.
- Complete the Owner's Spill/Environmental Incident Report Form and submit it to the owner as soon as possible or timeline as defined by the owner.
- Prepare and submit daily progress reports to the owner.

For spills, Maximum Mechanical Services will take the necessary steps to abate the discharge and provide the necessary labour, equipment, and materials to contain and remove the spill, clean up the affected area and dispose of waste materials at an approved disposal site. The area will be restored to the satisfaction of the regulatory authorities. Any soil or vegetation contaminated by spills shall be removed and disposed of at a waste disposal site approved by the regulatory authorities.

Employees Commitment

Maximum Mechanical Services requires the commitment of all employees to implement and maintain a healthy monitored environmental program. This commitment is transforming the environmental system into an effective process. Employee's decisions, actions and follow-up all combine to contribute to achieving Maximum Mechanical Services' high standard of environmental objectives.

Appendix A - Site	Specific Waste	Management
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WASTE / SOUF	RCE OF WASTE	HANDLING AND DISPOSITION
Refrigerant	New refrigerants brought to site and existing systems containing refrigerants.	Handling and disposition: Following industry best practices for recovering and recycling refrigerants as needed.
Concrete	Removed from existing units/work areas	Recycled at appropriate concrete recycling facility. If concrete is visibly contaminated, consult HSE department for further direction.
Contaminated Soil	Existing contamination discovered during excavation	Loaded and hauled to designate on-site stockpile location. Stockpiled soil to be staked and taped off after sampling by HSE Dept. Volumetric survey to be performed for soil accounting and management.
	Soil resulting from spill clean-up	Contain in suitable containers or bulk bags, label and stockpile. Dispose to approved disposal site after consultation with HSE dept.
	Hydro vac Tailings	If appropriate place in lined hydro vac ponds for temporary storage until sampling is performed to determine final disposal
	Hydro vac Water	Water to be sampled by HSE dept. prior to handling for offsite disposal or into client approved facilities.
Aerosol Cans	Spray paints; lubricants; adhesives	Collect in designated containers.
Plastic, Beverage containers, Glass	Lunchrooms, offices ,trailers	Collect in designated recyclable containers. Recycle via local charitable organization.
General Refuse; Office Waste	Lunch room waste; general garbage	Collect in designated non-hazardous waste bins labeled "General Purpose".
Office Paper	Printing; copying; document mgmt	Collect in designated non-hazardous waste bins labeled "Office Paper".
Cardboard	Shipping boxes; packaging, etc.	Collect in designated non-hazardous waste bins labeled "Cardboard".
Scrap Metal	Structural steel; shoring; cladding; insulation jacketing	Collect in designated non-hazardous waste bins labeled "Scrap Metal".

WASTE / SOUR	CE OF WASTE	HANDLING AND DISPOSITION
Used Oil Filters	Maximum Mechanical Services Equipment Maintenance, Subcontractor etc.	All used oil filters to be drained for 24hrs and placed into certified drums with lid and clamp for offsite disposal.
Used Oil	Maximum Mechanical Services Equipment Maintenance, Subcontractor etc.	Maximum Mechanical Services temporary used oil tank, certified identified and labeled barrel with bung openings. Ensuring use of drainage funnel for oil filters.
Wood	Shipping crates; formwork; decking; dunnage	Collect in designated non-hazardous waste bins labeled "Wood".
Insulation	Tank, Furnace Lining, piping covering.	Insulation type to be identified, Attach SDS to JHA/JSA. Double bag waste insulation and place into appropriate bin.
Demolition Material	Used site piping	SDS identifying all related products to be included and attached to JHA/JSA. For material Handling.
		Any leaking piping to be taken to client wash Pad for Steam cleaning if possible, Pressure washing prior to offsite disposal.
		Piping Insulation type to be identified and removed prior to offsite disposal.
		De-contaminated piping can be loaded into metal bin for offsite disposal.
		Develop a site specific Waste Demolition Piping removal and handling JHA/JSA if encountering this work.
Chemically treated wood	Sign posts, lumber for fencing	These items can be treated with PCP (Pentachlorophenol) CCA, (Chromate, Copper Arsenate) CN (Copper Hapthanate), ACA (Ammonia cal Copper Arsenate),
		These items are located within the Canadian Pest control, products act, and therefore are not considered hazardous waste, although these items must be disposed of at Class I or Class II Landfill
		Never attempt to burn for disposal.

Appendix B - Activities for Spill to Land

ACTIVITY	RESPONSIBILITY
Take immediate action to stop or reduce the spill and contain it, without endangering the health and safety of the workers or local population (e.g. right tipped or fallen containers, plug holes or leaks, replace stoppers or lids, etc.).	Workers and/or supervisor
Immediately notify supervisor.	Workers
Notify HSE Manager	Supervisor
Notify client, and or regulatory authority as per site specific requirements	HSE Manager
Initiate chain of notification as per site, "Incident Management".	Supervisor
Take any actions necessary to prevent the spill from contaminating groundwater or offsite surface water (e.g. construct dirt berms) or from becoming airborne (e.g. cover with plastic sheeting).	Supervisor, after consultation with HSE Dept and after checking MSDS
Barricade the area until corrective action is completed.	Supervisor
Identify the spilled material.	Supervisor or HSE Advisor
Remove the spilled material, including any contaminated soil. Remove any free liquid through adsorption, baling, vacuuming, pumping, etc.	Supervisor, after consultation with HSE Advisor and client
Contain and dispose of the waste as described in the Waste Management Plan.	Maximum Mechanical Services or Subcontractor after consultation with HSE Advisor and client
Within 24 hours, fill out a Loss control report Incident Investigation Report, following the	Supervisor with HSE Advisor assistance

Notes:

- 1. Specialized contractors or the client loss management team may be required in the event of a large spill.
- 2. Clean up of spills and disposal of the waste resulting from a spill due to a Subcontractor's activities is the responsibility of that Subcontractor.
- 3. Spills less than one liter require immediate action to stop or reduce the spill and notification to supervision or the HSE advisor but do not require further investigation.

Appendix C - Activities Spill to Water

ACTIVITY	RESPONSIBILITY
Take immediate action to stop or reduce the spill and contain it, without endangering the health and safety of the workers or local population (e.g. right tipped or fallen containers, plug holes or leaks, replace stoppers or lids, etc.).	Workers and/or supervisor
Immediately notify supervisor.	Workers
Notify HSE Manager	Supervisor
Notify client, and or regulatory authority as per site specific requirements	HSE Manager
Initiate chain of notification as per site, "Incident Management".	Supervisor
Identify the spilled material.	Supervisor or HSE Advisor
Take actions necessary to prevent further contamination of onsite surface water (e.g. use booms, dikes, berms, skimmers, etc.).	Supervisor, after consultation with HSE Advisor and client
Take actions necessary to prevent contamination of offsite surface water (e.g. use booms, dikes, berms, skimmers, etc.).	Supervisor in consultation with the with HSE Advisor and client
Clean up the spill.	Supervisor, after consultation with HSE Advisor and client
Contain and dispose of waste as described in the Waste Management Plan.	Maximum Mechanical Services or Subcontractor after consultation with HSE Advisor and client
Within 24 hours, fill out a Loss Control Report Incident Investigation Report,	Supervisor with HSE Advisor assistance

Notes:

- 1. Client operating plant or site personnel must be notified if the spill impacts existing plant drainage systems.
- 2. Specialized contractors or the client loss management team may be required in the event of a large spill.
- 3. Clean up of spills and disposal of the waste resulting from a spill due to a Subcontractor's activities is the responsibility of that Subcontractor.

Appendix D

SOIL TYPE	SOIL MANAGEMENT / DISPOSITION
Re-useable Fill	 Stockpiled in on-site area as designated by client Material excavated and hauled by Maximum Mechanical Services or its subcontractor.
Contaminated Fill	 Client verifies location for soil disposition Material excavated and hauled directly off site by client contractor Client is responsible for securing applicable waste tracking documentation prior to removal of material from site
Unexpected Contaminated Fill	 Segregate piles from each source location Log and tag piles by point of origin Contact HSE Advisor to characterize and arrange disposal of material Re-useable Fill stockpiled in location designated by client Contaminated Fill managed as above
Unsuitable Fill "Unsuitable" in this case means extremely wet "soupy" material.	 Ensure fill is not contaminated – confirm by visual inspection for hydrocarbons or detection of hydrocarbon odors Haul to pre-designated area Consult HSE Advisor if visual contamination is observed

Appendix E - Materials to be Avoided at Site

MATERIAL
Specific
Acrolein (107-02-8)
Asbestos (e.g. insulation, gaskets)
CFCs (chlorofluorocarbons such as chloroform, trichloroethylene, etc.)
Explosives
Fluorides
Mercury vapor lamps
Metal- (e.g. lead-) containing paints
MTBE (methyl tert-butyl ether)
PCBs (polychlorinated biphenyls, e.g. in transformer oil, lubricants)
Pesticides
Highly radioactive substances
Silica sand for sandblasting operations
Methanol (for hydro testing)
General ¹
Materials not listed on the Designated Substance List (DSL)
Materials with a low fish toxicity threshold
High benzene, toluene, ethyl benzene, xylene or styrene content
Materials with a very low threshold limit value (TLV) or occupational exposure limit (OEL).

Notes:

1. Materials proposed for use in the General category must undergo a detailed environment/industrial hygiene review.

Appendix F - Noise Survey and Monitoring

DATE						
AREA						
LOCATION						
SAMPLED BY						
Noise Meter I.D.						·
IDENTIFICATION OF EQUIPMENT		NOISE LEVELS MONITORED				
		(dBA)	(dBA)	(dBA)	(dBA)	(dBA)
		3 Feet	6 Feet	9 Feet	20 Feet	50 Feet
SKILL SAW						
BENCH GRINDER ON STEEL						
5" GRINDER ON STEEL						
85 TON CRANE						
65 TON CRANE (IDLE)						
CHIPPING HAMMER						
BUSH HAMMER						
SCALPER BUSH HAMMER						
HAMMER DRILL						
TEREX FORKLIFT						
BOBCAT						
WELDING MACHINE (PAK VAC POWER)						
JLG GROUND CONTROLS						
3/4" IMPACT GUN						
COMPRESSOR						

Section 19 – Workplace Violence and Harassment Program

Purpose

The purpose of this program is to maintain a work environment that is free from violence, harassment and any retaliation for reporting incidents. Maximum Mechanical Services recognizes the potential for workplace violence, harassment or other aggressive behaviour directed at employees working on Maximum Mechanical Services's behalf. Maximum Mechanical Services will not tolerate behaviour from anyone who intimidates, threatens, harasses, abuses, injures or otherwise victimizes employees and will take appropriate steps to protect employees from the hazards and risks associated with workplace violence or harassment. Complaints will be investigated and resolved quickly and confidentially. All subcontractors working on Maximum Mechanical Services's behalf will be aware of and comply with the company's program or have their own program in place.^{1, 2}

This program prohibits all forms of bullying, harassment and violence (hereinafter, referred to as a violation of "respect") by managers, supervisors, employees, suppliers, visitors and clients. Violations of respect will be investigated and, if substantiated, will be dealt with immediately. Violations of respect will not be tolerated and appropriate disciplinary action, up to and including termination, will be taken.

To support the objective of providing all employees with a healthy and safe worksite, it is required that supervisors and employees take preventative action to ensure that risks to individual's health and safety due to violations of respect, are eliminated and reported. Victims of workplace violence or harassment are advised to consult a health professional. Follow-up counselling services may be provided and arranged by the employee's supervisor when requested.

The Workplace Violence and Harassment Policy shall be posted in a visible location at the workplace.

Definition

Bullying – Interpersonal hostility that is deliberate, repetitive, and aimed at targeting an individual's health, safety or economic status.

Harassment – any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person that the person knows or ought reasonably to know will or would cause offence or humiliation to an employee, or adversely affects the employee's health and safety, and includes:

¹ Alberta Occupational Health and Safety Act, Part 1 - Obligation of Employers, Section 3(1)(c)

² Alberta Occupational Health and Safety Code, Part 27 - Violence and Harassment

- Conduct, comment, bullying, or action because of:
 - Race Gender identity
 - Mental disability
 Physical disability
 - Age Ancestry
 - Religious beliefs
 Marital status
 - Color
 Sexual orientation
 - Place of origin

- Source of income

Gender

Gender expression

- Family status of that person or of any other person
- i anny status of that poison of or any
- A sexual solicitation or advance, but excludes any reasonable conduct of an employer or supervisor in respect of the management of employees or a worksite.

Racial and Religious Harassment – Behaviour that is disrespectful or causes humiliation to a person because of their race, colour, nationality, ethnic origin, or the adornments and rituals associated with religious beliefs. This includes, but is not limited to:

- Slurs
- Gestures
- Name calling
- Swearing
- Taunts about an employee's religious or racial background
- Unwelcome banter, teasing, or jokes that are insulting to the individual's race or religion

It can also include the display of racist, derogatory or offensive pictures, materials or graffiti as well as refusing to work with or have eye contact with employees on the job because of their religious background.

Retaliation – Retaliation includes harassment, demotion, unwanted transfer, denial of opportunities within Maximum Mechanical Services or termination that is related to an individual's involvement in the Workplace Violence and Harassment complaint/complaint process.

Sexual Harassment – A form of discrimination based on gender. It is offensive, degrading, threatening, and unlawful. Sexual harassment is defined as unwelcome sexual conduct which includes unwanted sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature. The behaviour need not be intentional in order to be considered sexual harassment.

Some examples may include, but are not limited to:

- Pinching
- Patting
- Rubbing
- Leering

- · Inappropriate remarks or lewd comments
- "Dirty" jokes, pictures, materials, comments, suggestions, or innuendos
- Requests or demands of a sexual nature

Violence – Violence is the threatened, attempted, or actual conduct of a person that causes, or is likely to cause, physical injury. These acts include:

- Threats, menacing or threatening behaviour and all types of physical or verbal assaults.
- Argumentative behaviour in which threats are perceived or implied but are not overt.
- Unusual, bizarre, or menacing behaviour intensely focused on a grudge or grievance.
- Direct or indirect threats of harm or violence or intentional damage targeting personal or company property.
- Menacing gestures with a fist or brandishing a weapon.
- Low-level physical assault such as prodding, poking, or pushing.
- Physical violence; striking at another with a fist or weapon.
- Throwing an object with the intent to strike.

Right to Refuse Dangerous Work

An employee may refuse to work, or to do particular work at a worksite if the employee believes on reasonable grounds that there is a dangerous condition at the worksite or that the work constitutes a danger to the employee's health and safety or to the health and safety of another employee or another person, dangerous conditions include workplace violence and harassment.³

Roles and Responsibilities

Senior Management

Senior management's responsibilities within the Workplace Violence and Harassment Program include, but are not limited to the following:

- Lead by example by following the protocols of the Workplace Violence and Harassment Program.
- Ensure a process is in place for the adoption and implementation of the Workplace Violence and Harassment Program.
- Ensure a process is in place for supervisors to be trained in the implement the program.
- Supply adequate resources to meet the requirements of this program.
- Protect the fair and consistent application of this program.

³ Alberta Occupational Health and Safety Act, Part 4 - Dangerous Work and Discriminatory Action - Right to Refuse Dangerous Work, Section 31

Middle Management

Middle management's responsibilities within the Workplace Violence and Harassment program include, but are not limited to:

- Conduct hazard and risk assessments to safeguard employees from injury as a result of incidents of workplace violence.
- Develop and implement a violence and harassment prevention plan, policy, and procedures.
- Consult with the joint worksite health and safety committee or the health and safety representative in the development of the violence and harassment program.
- Verify that supervisors have implemented preventative measures to safeguard employees from injury as a result of incidents of workplace violence.
- Investigate all reports of workplace violence/harassment.
- Ensure a process is in place to maintain confidentiality of information obtained from workplace violence and harassment investigations.

Supervision

Supervision's responsibilities within the Workplace Violence and Harassment program include, but are not limited to the following:

- Train and educate employees on the components of the Workplace Violence and Harassment Program.
- Do not disclose confidential information unless this information is required on a need-to-know basis or during a workplace violence and harassment investigation.
- Assist with investigations of complaints regarding workplace violence and harassment.
- Advise employees to consult a health professional of the employee's choice for treatment or referral for counselling, if required.
- Discipline employees who retaliate against co-workers who exercises their rights under this program.

Employee

Employee's responsibilities within the Workplace Violence and Harassment program include, but are not limited to the following:

- Actively participate in training so as to understand the components of the Workplace Violence and Harassment program.
- Report all incidents of workplace violence or harassment to their supervisor or management to obtain immediate assistance.

- Seek resolution of any workplace violence or harassment incident.
- Assist in investigations of complaints of workplace violence and harassment, if required.
- Do not disclose confidentiality information unless this information is required on a need to know basis or during a workplace violence and harassment investigation.
- Consult a health professional of the his/her choice for treatment or referral for counselling, if required.
- Do not retaliate against co-workers who exercises their rights under this program.

Subcontractors

Subcontractors responsibilities within the Workplace Violence and Harassment program include, but are not limited to the following:

- Comply with the Workplace Violence and Harassment program.
- Notify Maximum Mechanical Services of any risks so they are identified and managed appropriately.

Self-Employed Persons

Self-employed persons' responsibilities within the Violence and Harassment program include, but are not limited to:

- Comply with the Workplace Violence and Harassment program.
- Notify Maximum Mechanical Services of any risks so they are identified and managed appropriately.

Sources of Violence and Harassment

Violence can occur for many reasons. There are four main sources that may cause acts of violence to occur in the workplace which are:

- **Employees and Co-workers** Individuals who have an employment-related relationship with the worksite victim. Current or former employees are included in this category.
- **Suppliers/Customers/Clients** Individuals who are recipients or providers of a product or service provided or received by the affected worksite or victim.
- **Employee-Related Outsider** Individuals who are possibly a current or former spouse, relative, acquaintance or some other person who has a dispute involving an employee of the worksite.
- **Outsiders** Individuals who have no legitimate relationship with the worksite or the victim and sometimes only enter worksites to commit criminal acts.

Control Measures

Maximum Mechanical Services will implement control measures to eliminate or, if that is not reasonably practicable, control the hazard of violence to employees. Examples of control measures include, but are not limited to:

- Posted signage
- Restricted access to work areas
- Locked doors
- Keycards
- Security cameras
- Alarms
- Fencing
- Lighting

- Personal protective devices
- Security guards
- Background checks
- Security procedures
- Emergency response procedures
- · Working alone procedures
- Time-lock safes
- Other robbery prevention measures

Recognizing the Potential for Violence

Recognizing signs of potential violence through observed changes in behaviour and physiology:

- Person is tense, clenched fists, aggressive stance, reddening of the facial skin and eyes, and obvious protrusion of blood vessels in the neck.
- Loud and aggressive tone of voice, speaking quickly, accusatory comments and verbal hostility.
- Difficulty remaining in control of their actions.

Dealing with Violence

When any person is confronted with the possibility of violence, the following actions should be taken:

- Remove themselves from becoming a victim, if possible, Call 911.
- · Focus attention on the person who may act violently.
- Do not stare or glare at the person.
- Remain calm.
- Be conscious about words spoken.
- Avoid technical jargon, speak simply.
- · Listen carefully and do not interrupt.
- Encourage the person to talk.
- Remain objective.
- Use silence as a calming tool.
- Acknowledge the other persons feelings (i.e., person is upset, etc.).

Reporting Workplace Violence and Harassment Procedures

We all share responsibility in creating a workplace that is free of violence and harassment and Maximum Mechanical Services does not tolerate behaviours of violence or threats of violence, harassment, or bullying. All employees, contractors, and visitors of Maximum Mechanical Services have a duty to report incidents of workplace violence as outlined below.

Imminent Danger—Immediate Reporting

Any employee who finds or considers themself or someone else to be in imminent danger while on Maximum Mechanical Services' property or while engaged in any company-approved activity can summon immediate assistance by contacting police at 911 (emergency), or by contacting Maximum Mechanical Services supervisor.

Violent Incidents/Threats of Violence

Employees who become involved in or witness a violent incident or a threat of violence, or who receive a report of such an incident are required to take the following steps:

- Ensure their own safety (remove themself from situation, see Work Refusal Procedure in Section 1).
- Do what is reasonably possible to ensure a victim's safety without endangering yourself or others.
- Call 911 if necessary.
- Make a documented, formal report/statement to their supervisor.

Non–Urgent Threats

Incidents involving statements or behaviours that do not present an immediate risk of physical harm, but make the employee feel threatened or otherwise concerned for their safety must be reported promptly to a supervisor.

Examples include harassing or bullying behaviour, a threatening comment, note, text message, email, voicemail, gesture, or a behaviour such as stalking.

The employee can contact a manager or a person they trust if the immediate supervisor is the problem. A documented formal report must be completed.

Domestic Violence

Employees experiencing domestic violence are encouraged to report their concerns to their immediate supervisor. Alternatively, the employee can contact another supervisor or a manager and/or a person they trust and should do so if they feel the violence may extend to the worksite or company property.

Employees who become aware, or ought reasonably to be aware, of an employee's involved in domestic violence that would likely expose the employee to physical injury or create the potential for damage to company property, should encourage the employee at risk to immediately inform their supervisor or human resources.

Persons with a History of Harassment/Violence

Employees must immediately inform their supervisor if there is the potential for encountering a person known to them as a person with a history of harassment/violence on company property and if the risk of violence is likely to expose the employee to physical injury. The supervisor must assume responsibility for informing management.

Threatening Behaviours

Employees who become aware of a person exhibiting harassing behaviour or behaviours that may lead to violence must immediately contact their supervisor, who will be responsible for informing senior management.

If the immediate supervisor is the source of threatening behaviour, the employee can contact a supervisor from another area.

Examples of such behaviour include inappropriate or aggressive discussions or communication via phone, text message, email, websites, social media, or a fascination with death or weapons.

Violence and Harassment Reporting Requirements

- All employees are required to immediately report acts of violence, harassment, threats, or possession of weapons on Maximum Mechanical Services property or during company-approved activities to their supervisor.
- All employees are encouraged to report persons of concern to their supervisor.
- The JHSC or HS representative must be informed if a person requires medical attention due to workplace violence.

Investigation and Documenting a Report of Workplace Violence and/or Harassment

Investigations will be conducted with confidentiality. Investigators will inform employees involved or consulted through the course of the investigation that discretion is an important part of the process.

- Maximum Mechanical Services must assign a competent person not directly involved with the occurrence to investigate any report of workplace violence or harassment.
- The investigation should commence as soon as possible, after the report is received.
- Maximum Mechanical Services must communicate with the parties involved, in writing, throughout the investigation process and must communicate/include the outcome of the investigation.
- Maximum Mechanical Services will communicate to all parties any and all corrective actions and implementation measures to be taken to address the incident.
- Persons found in violation of this Workplace Violence and Harassment Program may be subject to corrective action including, but not limited to the:
 - Requirement to attend an applicable awareness course.

- Requirement to attend counselling courses as directed by management.
- Requirement to participate in mediation.
- Receipt of progressive discipline.
- Each employee involved in witnessing an incident or threat of workplace violence or harassment against employees, contractors, or visitors should complete an Incident Report Form, and forward this to a supervisor/management, within twenty-four (24) hours of the incident or threat.

Responding to Reports of Domestic Violence

For situations involving domestic violence that would likely expose an employee to physical injury on Maximum Mechanical Services property, a manager or a supervisor will assist by meeting with the employee and developing a safety plan, if necessary, in consultation with police, courts or other agencies that may already be involved. Measures will be identified that may be taken by the employee and Maximum Mechanical Services to increase the employee's safety while at work.

Training

Employees shall be trained in:

- How to recognize workplace violence and harassment.
- The program, procedures, and worksite arrangements that effectively minimize or eliminate workplace violence and harassment.
- The appropriate response to workplace violence and harassment, including how to obtain assistance, and procedures for reporting, investigating, and documenting incidents of workplace violence and harassment.

Counselling

Employees shall be advised to consult a health professional of the employee's choice for treatment or referral for counselling if the employee:

- · reports an injury or adverse symptom resulting from workplace violence or harassment.
- is exposed to workplace violence or harassment.
- once an employee is referred to a health professional for a workplace violence and harassment incident the employee is entitled to their regular pay or benefits for the time which an employee attends a treatment session, if the time falls within regular work hours.

False Complaint

There shall be no adverse job consequences against any person for notifying management of a violation of this program unless an investigation determines that the person intentionally fabricated the complaint against

the accused. Complaints that are made in bad faith, are malicious or frivolous are considered serious and will result in disciplinary action.

Retaliation

There shall be no retaliation from co-workers directed at an individual making a complaint. In the event it is found that retaliation against an employee who exercises their rights under this program has occurred, appropriate discipline up to and including termination will be imposed.

Confidentiality

Information about an incident or threat will be disclosed only on a need-to-know basis to ensure a fair and thorough investigation is conducted and appropriate corrective action is taken. Maximum Mechanical Services will make every effort to ensure the safety and privacy of the individuals involved. All complaints shall be kept in confidence.

Program Review

With respect to the violence and harassment program, this must be reviewed on the earliest of the following:

- When an incident of violence occurs.
- If the joint worksite health and safety committee or the health and safety representative (if applicable) recommends a review of the plan.
- Every three (3) years.

Section 20 – Working Alone Program

Purpose

Maximum Mechanical Services shall ensure that when individuals are working alone or in isolation, and assistance is not readily available in the event of an emergency (including injury or illness), a personnel check system will be in force to provide an appropriate means of communication and assistance in order to protect the safety of the individual.¹

Maximum Mechanical Services will take all reasonably practicable steps to eliminate or reduce the hazards associated with the conditions and circumstances of the employee work or the isolation of the worksite.

Maximum Mechanical Services will ensure that a proper communication system is followed by its management, supervisors, and employees when it has been determined that a working alone situation exists on the worksite or a worksite isolation situation exists.

Definition

Working Alone – An individual is working by themselves and in circumstances or areas where assistance is not readily available in the event of an injury, illness, or emergency. Working alone is considered a hazardous task.

Roles and Responsibilities

Senior Management

Senior management's responsibilities within the Working Alone Program include, but are not limited to the following:

- Ensure a process is in place for the adoption and implementation of the Working Alone Program.
- Protect the fair and consistent application of this program.
- Ensure a process is in place establishing an effective means of communication to ensure employee safety when working alone.
- Ensure a process is in place for supervisors to be trained in the implementation of the working alone program.

¹ Alberta Occupational Health and Safety Code, Part 28 - Working Alone

Middle Management

Middle management's responsibilities within the Working Alone Program include, but are not limited to the following:

- Confirm that the risks arising from working alone are identified through the Hazard Assessment and Control process and prior to work commencing.
- Ensure that the working alone procedures/systems are reviewed at least annually, or more frequently if there is a change in work arrangements.

Supervision

Supervision's responsibilities within the Working Alone Program include, but are not limited to the following:

- Ensure employees are following a documented check in and out process based on the risks associated with the job.
- Verify the training or experience, or other standards of competency for both the employee working alone and the designated person monitoring communication with the employees.
- Ensure an effective communication system is in place based on the hazards identified.
- Assign a dispatch who will maintain contact with the employee.

Dispatcher

Dispatcher's responsibilities within the Working Alone Program include, but are not limited to the following:

- Record all information of employees checking in, including:
 - Employee's name
 - Current task or activity
 - Intended destination/planned route
 - Estimated travel time and duration
 - Cellular phone number
 - Emergency contact number
- Initiate a follow-up by calling the agreed upon contact number for the employee if the employee has not checked in by the expected check in time.
- Determine whether there is cell phone coverage in the area the person is working, if contact cannot be made. Is it possible for the person to call out?
- Contact the last known and next party the employee was scheduled to visit.
- If the check in time has passed and there is no contact with the employee, initiate a search.
- Initiate a search as directed by the supervisor.
- Make the decision whether or not to initiate the search, based on:

- The degree of hazard associated with the job or task the employee was undertaking.
- The extent to which changing conditions make a search more critical (i.e., weather, darkness, etc.).

Employee

Employee's responsibilities within the Working Alone Program include, but are not limited to the following:

- Follow the documented checking in/out procedure based on the risks associated with the job.
- Ensure a proper means of communication is on hand and a reliable communication system is in place prior to working alone.

Communication Requirements

Supervisor will determine a proper communication system to be followed by the designated person and employees when it has been determined that a working alone situation exists on the worksite or a worksite isolation scenario exists.

The communication process will include, at a minimum, the time interval between checks and the procedure to follow in case the individual working alone cannot be contacted, including provision for emergency rescue. High risk activities require shorter time intervals between checks. This communication must be performed at a minimum of every two (2) hours, dependent upon the nature of the hazard associated with the individual's work.

The employees working alone must have an effective method of communication such as radio, telephone or cellular phone, or a more advanced means of electronic communication dependent upon the risk involved.

Should electronic communication not be practicable, the supervisor will either assign a competent person to check the well-being of the individual working alone at appropriate time intervals, or instruct the individual working alone to maintain contact at designated intervals dependent upon the associated hazards.

Supervisors will review Maximum Mechanical Services' working alone requirements on various worksites on an on-going basis and make findings known to management and employees directly involved with the worksite location.

Communication Procedure

- 1. Employee will verify that the proper means of communication is available.
- 2. Employee will check in with the designated person prior to leaving origin location.
- 3. Employee will give the designated person an estimated time of arrival.
- 4. After arriving at the destination, the employee will again check in with the designated person to advise that they are on location.

- 5. If the employee is on location for a period of longer than two (2) hours, they will check in with dispatch every two (2) hours while on location.
- 6. Prior to leaving the location, the employee is required to notify dispatch that the job is complete, that they are leaving the location, and the estimated time of travel.
- 7. Employee must report any changes to their itinerary immediately to their dispatch.
- 8. Employee is to notify dispatch when arriving back at origin location.

Note: If the employee forgets to check in when required, they are to immediately contact their supervisor and dispatch as soon as they remember.

Training

Any individual required to work in these circumstances must be made aware of the hazards and trained in proper procedures and practices to reduce the potential risks. It is imperative that the individual understands the requirements when working alone and follows check in/out requirements.

Any person assigned to check on an individual working alone must also be competently trained in these practices and procedures.

Section 21 – Transportation - Light Vehicles

Purpose

This program applies to all operators of light duty vehicles owned, leased or operated by Maximum Mechanical Services. This can include all employee vehicles for which an hourly or monthly allowance is paid.¹

Vehicles owned and operated by Maximum Mechanical Services will be operated in accordance with Alberta Traffic Safety Act. Documents, records, and files pertaining to the operation of Maximum Mechanical Services vehicles will also be retained in accordance with these regulations. Maximum Mechanical Services believes that vehicle damage is preventable and will investigate all reported incidents according to the HSE-MS protocols.

Prevention of these incidents is a shared responsibility among management, employees, customers, suppliers and the public.

Definitions

Driver – All employees with care, custody and control of vehicles, or combinations of vehicles, registered for a weight less than 4,500 kg that are owned, leased or operated by Maximum Mechanical Services.

Suppliers – A person or entity that is the source for goods or services.

Vehicle Incident – All incidents involving any vehicle owned, leased, rented, or sub-contracted by Maximum Mechanical Services and can include all employee vehicles for which an hourly or monthly allowance is paid.

Serious Vehicle Incident – Any incident that must be reported to police, Occupational Health and Safety (OH&S) or other regulatory bodies such as WCB:

- Incidents that result in moving traffic violations under the Alberta Traffic Safety Act.
- Incidents that result in charges under the Criminal Code of Canada.
- Incidents that result in an injury classified as Lost Time, Restricted (Modified) Work or Medical Aid for any Maximum Mechanical Services employee or other person at the worksite. (Maximum Mechanical Services or others) at the worksite.
- Incidents that result in environmental, property damage, equipment damage, cargo damage or other loss in excess of \$5,000.00.

¹ Quebec Highway Safety Code

Roles and Responsibilities

Senior Management

Senior management's responsibilities with the Transportation - Light Vehicles process include, but are not limited to:

- Ensure a process is in place establishing an effective means of this program.
- Only purchase, rent, or lease vehicles that is manufactured in accordance with all applicable legislation, and all manufacturing standards.
- Ensure a process is in place for the adoption and implementation of the Transportation Light Vehicles program.
- Ensure a process is in place for supervisors to be trained in the implementation of the Transportation Light Vehicles program.
- Protect the fair and consistent application of this program.

Middle Management

Middle management's responsibilities with the Transportation - Light Vehicles process include, but are not limited to:

- Adapt, implement and apply all areas of this program.
- Confirm supervisors are trained in the implementation of this program.
- Protect the fair and consistent application of this program.

Supervision

Supervision's responsibilities under the Light Duty Transportation Program include, but are not limited to:

- Complete an Incident Investigation Report for each ticket or warning received by a driver from authorities, following the normal Incident Reporting process.
- Not operate a vehicle if they are fatigued, in a highly agitated state, confused, ill or their abilities to operate a motor vehicle are impaired by alcohol, drugs, or medication.
- Not permit employees to drive or operate vehicles if they are fatigued, in a highly agitated state, confused, ill or their ability to operate a motor vehicle is impaired by alcohol, drugs or medication.

Driver/Employee

Driver/employee responsibilities under the Light Duty Transportation Program include, but are not limited to:

• Drive defensively, lawfully, under control and in compliance with all applicable Acts, Regulations, Bylaws and policies.

MAXIMUM MECHANICAL SERVICES

- Ensure that all current required documentation, including registration, insurance, inspection and weight information, is in the vehicle.
- Report all tickets, warnings, inspections, etc., received while operating, or in control of, a Maximum Mechanical Services vehicle to supervision.
- Pay all fines for violations which occurred while operating a company vehicle, includes any fines issued as a result of photo-enforced speed or signal violations.
- Ensure the vehicle assigned to them is operated in a safe manner.
- Possess the appropriate and valid driver's license. The license must be current with an up-to-date address and must satisfy all requirements to operate the respective vehicle.
- Comply with operator's license codes and conditions when driving company vehicles (i.e., drivers who require corrective lenses in order to meet the minimum visual requirements must always wear corrective lenses while driving).
- Not operate a vehicle if they are fatigued, in a highly agitated state, confused, ill or their abilities to operate a motor vehicle are impaired by alcohol, drugs, or medication.
- Wear a seatbelt at all times while operating company vehicles as per the Provincial Traffic Safety Act and Highway Rules of the Road regulations.
- Will operate within the posted speed limit and reduce speed depending on road and weather conditions.
- Refrain from using cruise control on slippery or icy road conditions.
- Do not use radar detecting devices in company vehicles.
- Follow the necessary safety precautions when refuelling vehicles (i.e., no smoking while refuelling).
- While refuelling vehicles, do not have motor running or leave pump unattended.
- Do not use mobile devices while refuelling.
- Report any reportable spills to supervisor.
- Report and document all vehicle defects immediately and corrected by priority order.
- Secure all loads properly, using tie down assemblies appropriate for the size and type of load.
- Use warning devices such as emergency flashers and reflective triangles if it becomes necessary to park a vehicle on the side of the road. The following rules also apply:
 - Always turn on emergency flashers.
- Use headlights at all times when driving.
- Do not transport any firearms in vehicles owned, leased or operated by Maximum Mechanical Services.
- Use hands-free cellular devices, if equipped. If a vehicle is not equipped with a hands-free device, if safe to do so, the driver must stop and park the vehicle and then is permitted to utilize the mobile device.

- The number of people allowed in the vehicle as passengers will be determined by the availability of seat belts. Passengers will not be transported outside of the vehicle, such as in the cargo bed.
- Ensure only authorized personnel are in company vehicles.

Vehicle Assignment and Use

Vehicles owned, leased or operated by Maximum Mechanical Services will only be assigned to approved drivers. Only authorized persons are permitted to ride in company vehicles. Employees assigned vehicles will be required to complete a vehicle use agreement.

All vehicles and equipment will be operated in accordance with applicable Federal Regulations, Provincial Acts and Bylaws, Municipal Regulations, company and client specific policies, and Transportation of Dangerous Goods Regulations.

Risk Class	Classification Criteria	Risk Mitigation and Management Strategies
Low	• Demerits <6	 No restrictions on driving Abstracts reviewed annually Defensive Driving recommended every three years.
Medium	 Demerits 7 – 10 Driving Experience <3 years Two Photo Enforcement tickets in two years One preventable vehicle incident in 24 months 	 No restrictions on driving Abstract review every 6 months Defensive Driving Mandatory Documentation to employee file Sign-off by management
High	 Demerits >11 Conviction for Impaired Driving in previous three years Conviction for Refusal to Provide Breath Sample in previous three years Administrative Suspension within previous two years Four photo Enforcement tickets in two years Two preventable vehicle incidents in 24 month period 	 Loss of take home privileges for vehicles owned, leased or operated by Maximum Mechanical Services Abstract review every 6 months Mandatory Defensive Driving Mandatory Driver Evaluation Senior Management notification of Driver's Status Documentation to employee file Sign-off by senior management

*Photo Enforcement Tickets apply to identified drivers issued violations while operating vehicles owned, leased or rented by Maximum Mechanical Services and does not apply to personal vehicles.

Only authorized persons are permitted to ride in light vehicles owned, leased or operated by Maximum Mechanical Services.

Vehicle Inspection

Vehicle Inspections are among the best tools available to identify hazards and assess the risks associated with the operation of a vehicle prior to incidents and losses occurring. Inspections are to be recorded on a Daily Vehicle Inspection Report form. All vehicles must be thoroughly inspected prior to use and every twenty -four (24) hours while in operation. Any significant deficiencies must be reported to supervision and corrected prior to vehicle use.

Section 22 – Codes of Practice, Safe Work Practices and Procedures

Purpose

Codes of Practice, Safe Work Practices and Safe Job Procedures are the written administrative controls on how to perform tasks in a safe and correct manner.¹

Definitions

Code of Practice – A code of practice is intended to provide practical guidance, present safe work procedures and address issues specific to the hazard to which the code applies. Section 8 of the OHS Code requires that procedures be in writing and available to employees.

As required by section 33 of the OHS Act, the employer must ensure that:

- A copy of the code of practice is readily available to employees and other persons at the worksite, and
- All employees to whom the code of practice applies receive appropriate education, instruction or training regarding the content of the code of practice.

Safe Work Practices – Safe Work Practices are generally written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes.

Safe Job Procedures – Safe Job Procedures are a series of specific steps that guide an employee through a task from start to finish in a chronological order.

Roles and Responsibilities

Senior Management

Senior management's responsibilities with the Codes of Practice, Safe Work practices and Procedures.

Process include, but are not limited to the following:

- Ensure a process is in place establishing an effective means to develop and implement the applicable Codes of Practice, Safe Work practices and Procedures.
- Ensure a process is in place for supervisors to be trained in the implementation of the Codes of Practice, Safe Work practices and Procedures.
- Protect the fair and consistent application of this program.

¹ Alberta Occupational Health and Safety Act, Part 8, Section 62

Middle Management

Middle management's responsibilities with the Codes of Practice, Safe Work practices and Procedures process include, but are not limited to the following:

- Adapt, implement and apply all areas of this program.
- Confirm supervisors are trained in the implementation of this program.
- Confirm employees are trained in applicable areas of this program.
- Protect the fair and consistent application of this program.
- Review the applicable Codes of Practice, Safe Work Practices and Procedures regularly to ensure the information is current and accurate.

Supervision

Supervision's responsibilities with the Codes of Practice, Safe Work practices and Procedures process include, but are not limited to the following:

- Lead the Codes of Practice, Safe Work practices and Procedures process in conjunction with management, as required.
- Communicate and train all employees on their responsibilities regarding Codes of Practice and Safe Work Practices and Procedures.
- Review the applicable Codes of Practice, Safe Work Practices and Procedures regularly with management, employees and JHSC to ensure the information is current and accurate.

Employee

Employee's responsibilities within Codes of Practice, Safe Work practices and Procedures include, but are not limited to the following:

- Assist in the development and review of the Codes of Practice, Safe Work Practices and Procedures as required.
- Not starting work until familiar with their responsibilities in the Codes of Practice, Safe Work Practices and Procedures.
- Adhere to all requirements of the Codes of Practice, Safe Work Practices and Procedures.

Development of Safe Work Practices and Procedures

The development of Safe Work Practices is a continuous process that is based on information obtained from the completed Hazard Assessment and Control and has been entered into a Job Task Inventory.

Safe Job Procedures supplement the Safe Work Practices and are designed to reduce the risk by minimizing potential exposure. Safe Job Procedures are developed following completion of a Job Safety Analysis.

Delivery

All relevant safe work procedures and safe job procedures should be included in the new employee orientation. All employees should be aware that thees have been established, are in effect, and should be followed.

All safe work practices and safe job procedures should be kept in a location central to the work being performed and readily available to all employees.