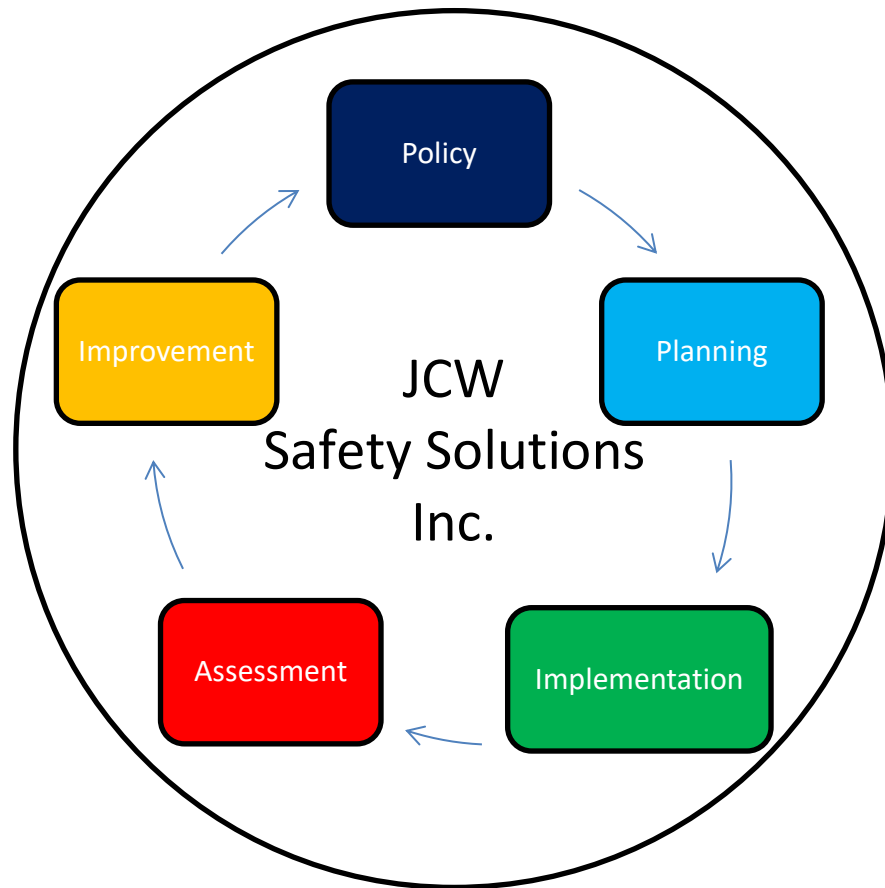


HEALTH AND SAFETY, (H&S) - MANAGEMENT SYSTEM (MS)



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INTRODUCTION

JCW Safety Solutions is an Alberta based company providing services related to Health and Safety needs. **JCW Safety Solutions** believes that through teamwork and superior execution our mission is to deliver unwavering quality, services, and materials.

Ensuring the safety of each employee is our top priority. Every **JCW Safety Solutions** employee is empowered to always deliver best-in-class safety performance.

Always forward-thinking, we are invested in a continuous improvement process to increase the safety of our employees, our customers, and the communities where we work and live. **JCW Safety Solutions** safety-always mindset fuels our pursuit of a zero-incident culture.

JCW Safety Solutions Health and Safety Management System applies to all employees, Contractors and subcontractors providing services or conducting work for **JCW Safety Solutions** and is in alignment with:

- CSA Z1000-06, the Canadian occupational health and safety specification
- ANSI Z10.0, a standard on occupational health and safety management systems
- ISO 45001, an international occupational health, and safety specification

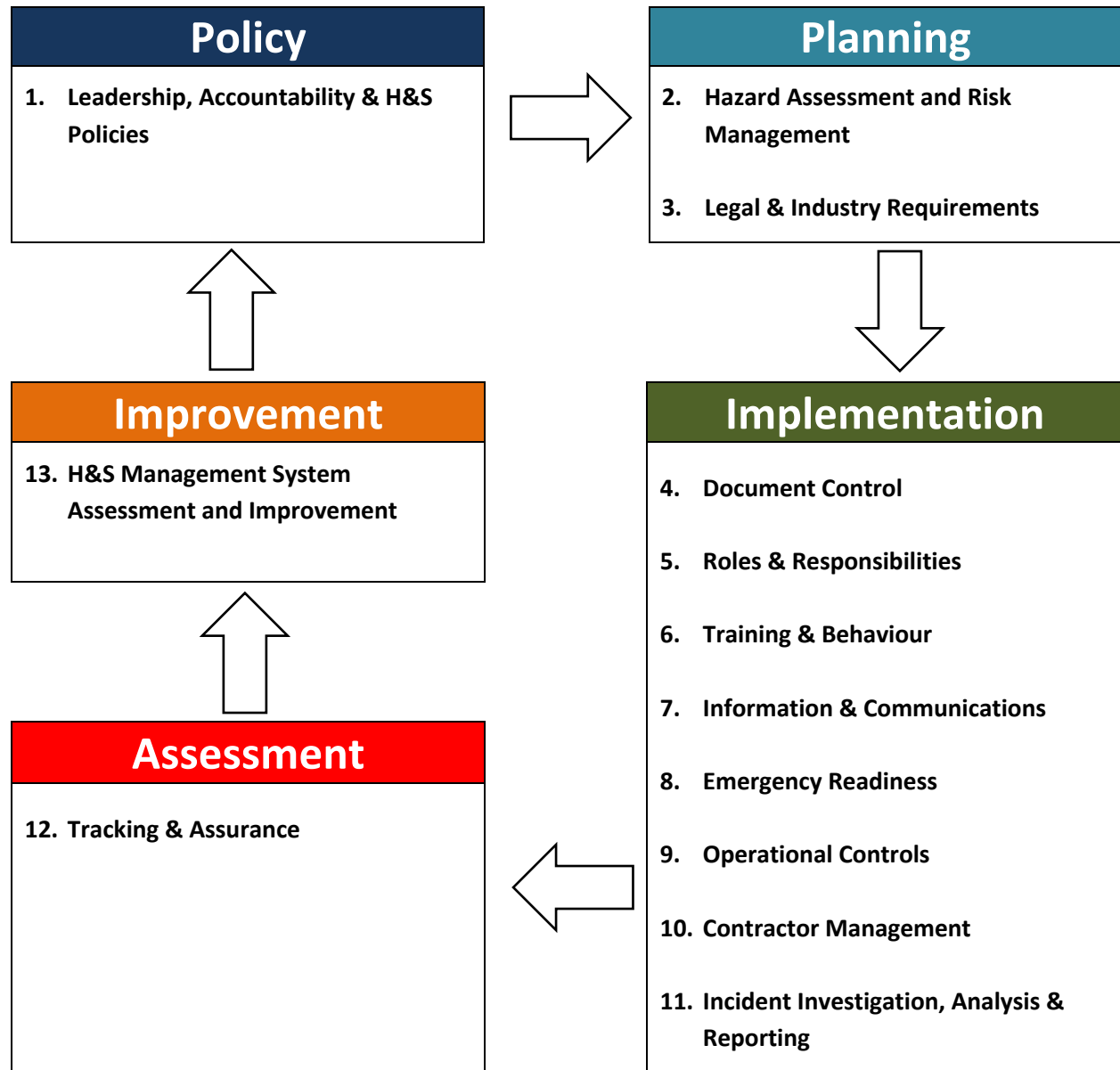
Owners, prime contractors, employers, and management must all commit to making this Health, and Safety Management System work.

This Health and Safety Management System provides the employees, management, and subcontractors of **JCW Safety Solutions**, with the tools and the resources necessary to effectively manage risk to themselves and others. It should not be considered all inclusive. Legislative requirements exist in various jurisdictions that complement the content of this system and must be adhered to.



Plan-Do-Check-Act Methodology

The following flow chart is based on the continuous improvement cycles in combination with the “Planning-Implementation-Assessment-Improvement” (Plan-Do-Check-Act) Methodology.





HEALTH & SAFETY MANAGEMENT SYSTEM

Management System Framework

| AEIGION H&S MS | CSA Z1000-06 | ANSI Z10.0 | ISO 45001 |
|--|---|--|--|
| POLICY ELEMENT | | | |
| 1. Leadership, Accountability & H&S Policies | 4.2 Commitment, Leadership and Participation | 5.1 Management Leadership 5.1.2 OHS Policy | 5.1 Leadership and Commitment 5.2 OH&S Policy |
| PLANNING ELEMENTS | | | |
| 2. Hazard Assessment and Risk Management 3. Legal & Industry Requirements | 4.3.4 Hazard and risk Identification and Assessment 4.4.2 Preventive and Protection Measures 4.5.5 Prevention and Corrective Action 4.3.3 Legal and other Requirements | 6.2 Assessment and Prioritization 8.2.1 Identification of Hazards 8.3 Risk Assessment 8.4 Hierarchy of Controls 8.2.4 Identification of Legal and Other Requirements | 6.1.2 Hazard Identification & Assessment 6.1.3 Determination of Legal Requirements and other Requirements |
| IMPLEMENTATION ELEMENTS | | | |
| 4. Document Control 5. Roles & Responsibilities 6. Training & Behaviour 7. Information & Communications 8. Operational Controls 9. Contractor Management 10. Emergency Readiness 11. Incident Investigation, Analysis & Reporting | 4.4.8 Documentation 4.4.4 Competence and training 4.4.5 Communication and awareness 4.4.7 Management of Change 4.4.6 Procurement and Contracting 4.4.3 Emergency Prevention, Preparedness, and Response 4.5.3 Incident Investigation and Analysis | 7.4 Document Control 4. Context of the Organization 5.1.3 Responsibility and Authority 7.2 Education, Training & Competence 7.3 Awareness & Communication 8. Implementation & Operation 8.5 Design Review & Management of Change 8.6 Procurement 8.7 Contractors 8.9 Emergency Preparedness 9.2 Incident Investigation | 7.5.3 Control of Documented Information 5.3 Organizational Roles, Responsibilities and Authorities 5.4 Consultation and Participation of Workers 7.4 Communication 8.1 Operational Planning & Control 8.1.4 Procurement 8.2 Emergency Preparedness and Response 10.2 Incident, Nonconformity, and Corrective Action |
| ASSESSMENT ELEMENTS | | | |
| 12. Tracking & Assurance | 4.3.5 Occupational Health & Safety Objectives & Targets 4.5 Evaluation and Corrective Action 4.5.2 Monitoring and Measurement 4.5.4 Internal Audits | 6.3 Objectives and Targets 9. Evaluation and Corrective Action 9.1 Monitoring, Measurement and Assessment 9.3 Audits | 9.0 Performance Evaluation |
| IMPROVEMENT ELEMENT | | | |
| 13. H&S Management System Assessment and Improvement | 5 Management Review and Continual Improvement | 9.5 Feedback and Organizational Learning 10. Management Review | 10.0 Improvement |

Correlation between **JCW Safety Solutions** Health and Safety Management System, CSA Z1000-06, ANSI Z10.0, & ISO 45001



HEALTH & SAFETY MANAGEMENT SYSTEM

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1.0 LEADERSHIP, ACCOUNTABILITY AND H&S POLICIES

Personnel at all levels and in all departments within **JCW Safety Solutions** provide leadership to achieve its Health and Safety Policy commitments. Management is focused on the responsibility to deliver results consistent with **JCW Safety Solutions** goals and objectives. Management accomplishes their objectives by managing a trained and motivated team and employing fit for purpose tools and systems. Our teams are organized to promote coordinated and focused attention to all of our activities.

Management commitment and leadership provide the foundation upon which a structured and effective H&S Management System can be built. It sets the tone within **JCW Safety Solutions** and provides the necessary support to ensure that momentum is maintained.

The personal safety and health of each employee of **JCW Safety Solutions** is of primary importance. Prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity. To the greatest degree possible, management will provide all mechanical and physical activities required for personal safety and health, in keeping with the highest standards.

JCW Safety Solutions policies are written statements that confirms our company's commitment to having a healthy, safe, and environmentally responsible workplace

Senior Management will approve, sign, and commit to Health and Safety policies. The effective implementation of these policies is the primary objective of the H&S Management System.

1.1 Expectations of Leadership

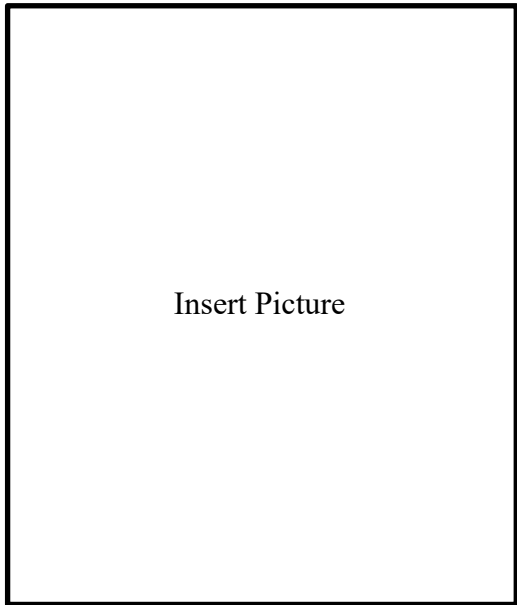
- Provide leadership for Occupational Health and Safety activities and assume overall responsibility for the H&S Management System.
- Maintain and implement this H&S Management System.
- Take a leadership role in Occupational Health and Safety issues to ensure the success of the H&S Management System.
- Exhibit behaviour that creates and maintains a respectful, positive, and constructive working environment.
- Embrace **JCW Safety Solutions** values and lead those under their supervision to do the same.
- Participate in H&S Training.
- Participate in Joint Health and Safety Committee Meetings.
- Lead H&S through personal commitment, consistent decision making, and appropriate resource allocation.

Insert Picture



Policy **Policy** **Policy**

- Allocate appropriate resources to ensure that the health and safety of employees is protected at the work site.
- Actively promote safe work practices by personally leading health and safety initiatives.
- Ensure workers are aware of all policies and procedures.
- Encourage "health and safety stand downs" and other safety events to focus attention on safety.
- Ensure health, safety and environmental incidents are investigated in a timely manner and lessons learned communicated to all personnel.
- Participate in health, safety, and environment incident investigations.
- Lead, direct and support the H&S initiatives.
- Plan, set and support H&S goals and objectives.
- Provide opportunities for relevant H&S related training.
- Include safety as a regular part of Management meetings.
- Enforce company rules and discipline.
- Comply with all legislated requirements.
- H&S policies are long term commitments to H&S Performance and to continuous improvement.
- H&S policies shall be communicated to all employees and stakeholders.
- H&S policies will be updated as necessary to reiterate commitment and to keep the policies current, and
- Occupational Health and Safety is a responsibility shared by senior and line management, employees, customers, owners, and others present at the worksite.



1.2 Key Documents

- Health and Safety Policy
- Health and Safety Training Policy
- Progressive Disciplinary Policy
- Right to Refuse Unsafe Work Policy
- Workplace Harassment and Violence Policy



2.0 HAZARD ASSESSMENT AND RISK MANAGEMENT

JCW Safety Solutions considers a hazard “any situation/energy/condition or thing with the potential to do injury or damage to people, property, or the environment”. As such, JCW Safety Solutions recognizes that hazard identification and control on the worksite is a critical step in the prevention of incidents.

2.1 Hazard Assessment

A hazard assessment is a thorough check of the work environment. The purpose of a hazard assessment is to identify potential risks and hazards in the area, as well as to identify appropriate safety measures to be used to mitigate the identified hazards.

2.2 Risk Management

Risks and impacts can be controlled and managed if they are known and quantified. The objective of risk management is to establish controls for all risks. Risk management includes the identification of hazards, assessment of severity and probability to quantify the risk and application of control measures. Control measures will be used to eliminate, reduce, or mitigate hazards to protect against injury, or occupational health disorders, equipment as well as environmental impacts.

2.3 Environmental Risks

Environmental risk management seeks to determine what environmental risks exist and then determine how to manage those risks in a way best suited to protect human health and the environment.

Environmental Management is integral to the operations of JCW Safety Solutions. Environmental Management ensures that all activities are conducted in an environmentally safe and ethical manner.

2.4 Selecting Controls

A control is a suitable means of controlling identified risks. Applying this hierarchy is a systematic approach to identify the most effective method of risk reduction. The preferred method is to first ask “is there another way we can do this task (elimination or substitution)”? If not, implement engineering controls as they are less dependent on human behaviour and then follow with administrative controls. Lastly, the use of PPE can minimize the severity of the hazard but must not be used as the sole hazard control.

Supervisors and workers should work together on selection of appropriate controls as it ensures worker participation. Often a hazard cannot be eliminated or controlled by a single source method, in these situations a combination of controls may be the best solution.

REMEMBER: All workers must take responsibility for identifying, assessing, and controlling the hazards in their workspace. JCW Safety Solutions encourages a philosophy of:

“If you see a hazard, do something about it. If you can’t, report it to someone who can”

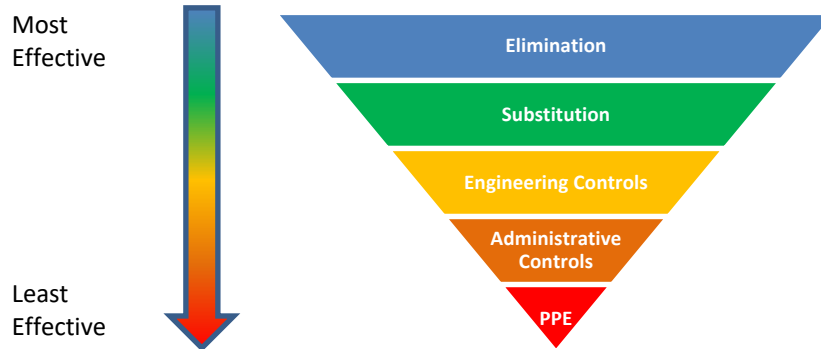


Planning

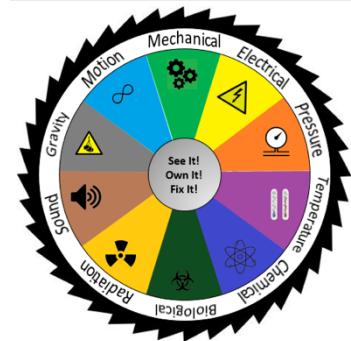
Planning

Planning

2.4.1 Hierarchy of Controls



Energy Hazard Wheel

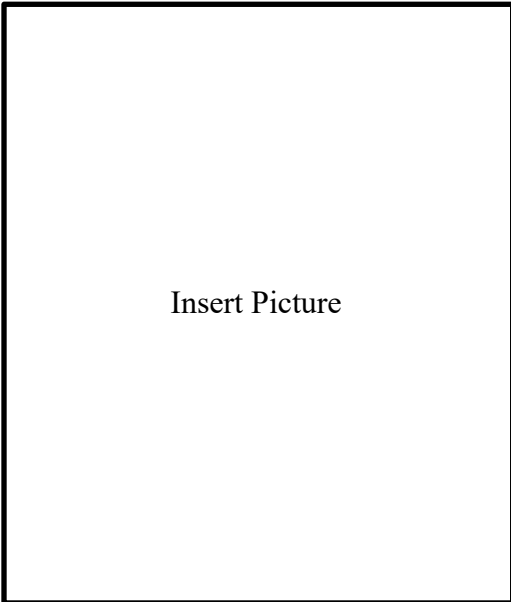


2.5 Expectations

- Conduct Hazard Assessments as required under **JCW Safety Solutions** H&S Management System.
- An H&S risk register is maintained, including associated mitigation measures.
- Identify, correct, and document hazards in the workplace on the appropriate forms.
- Understand the potential consequence of those hazards.
- Take corrective action and make recommendations for the control of hazards.
- Ensure safeguards are in place to prevent, detect or mitigate potential hazards.
- Report potential process and operations hazards.
- Monitor and follow up to ensure corrective action is taken.
- Review completed hazard assessments with employees.
- The “Hierarchy of Control” will be followed:
 - Elimination
 - Substitution
 - Engineering
 - Administrative Controls, and lastly
 - Personal Protective Equipment
- Supervisors are responsible to reinforce the use of controls in the workspace through:
 - Inspections and Hazard Assessments
 - Pre-project Meetings, Safety Meetings, Tailgate Meetings/Toolbox Talks; and
 - Joint Health and Safety Committee.
- Be aware of government regulations including Federal, Provincial, Municipal laws and by-laws.

2.6 Key Documents

- Risk Assessment and Control Safe Work Practice
- Management of Change
- H&S Communication Strategy





3.0 LEGAL & INDUSTRY REQUIREMENTS

JCW Safety Solutions 'Privilege to Operate' is contingent upon compliance with First Nations, Indigenous, Municipal, Provincial and Federal Directives, Regulations, Act's, and Permits. Identification, management, and communication of legal and regulatory requirements are critical to compliance. Working for **JCW Safety Solutions** obligates you to comply with legal, company and customer rules and procedures.

Many of these acts and regulations set minimum standards for Workplace Health and Safety. **JCW Safety Solutions** strives to exceed minimum standards set forth in these regulations wherever possible. Where there is no **JCW Safety Solutions** standard present, Legislation is the minimum standard that is expected on an **JCW Safety Solutions** work site.

All changes in applicable legislation will be identified and reviewed to determine their potential impact on all operations. Any changes in operational processes, codes and standards required to conform to the change in legislation will be developed and implemented and communicated to all interested or affected parties including but not limited to owners, prime contractors, employers, and management.

The regulations pertinent to a particular office and province will be made available to all representatives of **JCW Safety Solutions**. The Operations Manager will ensure that their personnel have the necessary training and competence to meet the requirements laid out by the appropriate regulatory bodies and industry standards (i.e., WHMIS). Other pertinent rules and regulations will form part of the regularly scheduled safety meeting topics.

There are Four Common Characteristics of Legal and Industry Requirements:

1. Focuses on public welfare
2. Uses some combination of regulations, codes, and/or rules
3. Applies strict liability for offences (possible for some exceptions), and
4. Allows for the due diligence defense when applicable (other defenses may also be used)

3.1 Expectations

- All activities comprising the business of **JCW Safety Solutions** will be performed according to the regulations laid out by the appropriate regulatory bodies.
- All procedures, protocols and training requirements will meet applicable industry standards, codes, and regulations.
- Recognize and meet the legal and contractual obligations that are applicable to all work areas.
- Periodically evaluate and verify conformance with requirements.
- Maintain a Regulatory Register and Standards document with the key H&S regulations and standards that govern **JCW Safety Solutions** activities with the register and standards document acting as the linking mechanism between the regulations and the H&S Management System

3.2 Key Documents

- Legal and Other Requirements Procedure
- Regulatory Register



4.0 DOCUMENT CONTROL

Document control is all to do with transferring information between relevant parties. As documentation will be relied upon for key Health and Safety decisions, it is important to have effective document control. Document control provides a structured management of information for a higher degree of reliability, security, version control, visibility, availability and with a controlled reliable audit trail.

JCW Safety Solutions has established a document control system to maintain records to provide conformity to the H&S Management System.

To ensure only the current version of all H&S Documents are referenced, H&S Documents are stored and retrieved via the Document Control System. Documents in the electronic system are designated “controlled documents” printed documents are designated “uncontrolled documents”.

Note: Workers have the right to access records relevant to their OHS, while respecting the need for confidentiality.

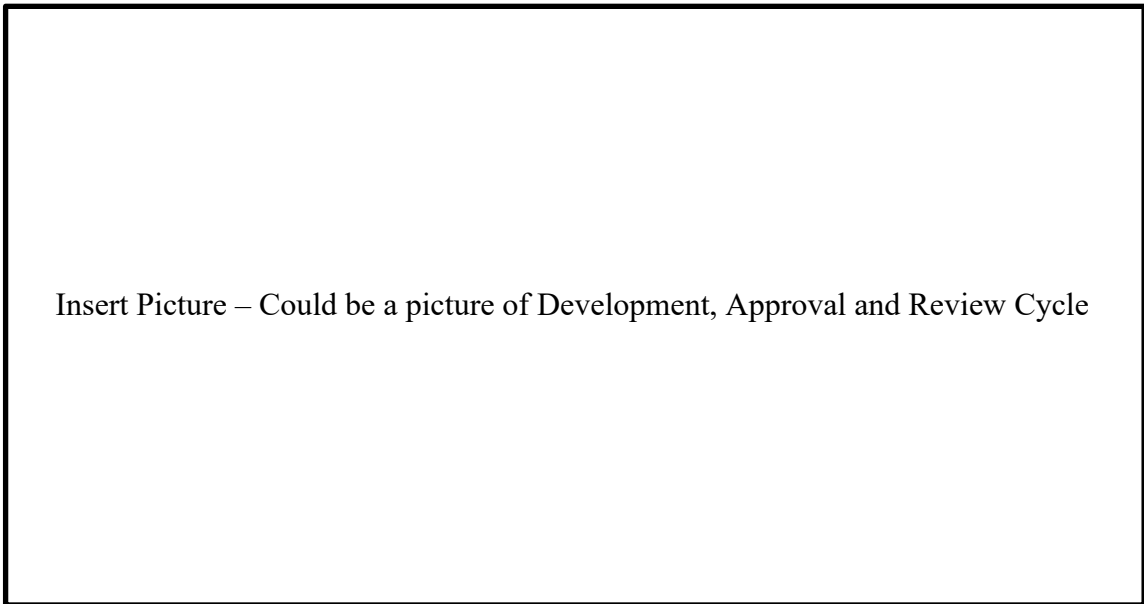
4.1 Document Structure

| Responsibility / Ownership | Document Structure | Document Approval Authority <i>(Anyone, not all required)</i> | |
|----------------------------|--------------------|--|---|
| | | Approving Authority | Examples |
| Executive | Level 1 | <ul style="list-style-type: none"> General Manager/VP SVP HR-H&S VP – H&S Director H&S Director(s) | <ul style="list-style-type: none"> H&S Management System H&S Policy Documents |
| Corporate H&S | Level 2 | <ul style="list-style-type: none"> H&S Director(s) H&S Manager(s) | <ul style="list-style-type: none"> Safe Work Practices Environmental Work Practices Codes of Practices |
| | Level 3 | <ul style="list-style-type: none"> Manager(s) Supervisor(s) H&S Representative(s) | <ul style="list-style-type: none"> Formal Hazard Assessments H&S Programs |
| Division / CSG Leadership | Level 4 | <ul style="list-style-type: none"> Supervisor(s) Worker(s) H&S Representative(s) | <ul style="list-style-type: none"> Standard Operating Procedures Field Level Hazard Assessments |
| | Level 5 | <ul style="list-style-type: none"> No approval Required | <ul style="list-style-type: none"> Forms and Records |



4.3 Expectations

- Key Documents are controlled by a document control procedure which clearly defines:
 - An approval process including responsible roles for approval for prior to use
 - A document review cycle including responsible roles for reviewing
 - A revision section which identifies the version and changes between revisions
 - The location of master documents and how users are notified of any changes
 - Relevant versions are readily available and suitable for use, where and when it is needed
 - The format of documents and any system to identify new documents, and
 - The process of archiving past or obsolete versions.
- Documents are readily available for ongoing work activities and can be used as the basis for H&S decisions
- Safety and environment related information and data requires retention, including hazard analysis information, process operations, technology information and equipment information
- A process is in place for checking external documents (i.e., ensuring documents comply to legislation)
- A Management of Change process is used to ensure that persons across disciplines, with the required expertise, review and approve changes before they occur



4.4 Key Documents

- Document Control Procedure



5.0 ROLES & RESPONSIBILITIES

Effective management of Health and Safety issues must be driven by Senior Management and is critical to the success of the H&S Management System. Occupational Health, Worker Safety and Environmental Assurance is a responsibility shared by senior and line management, supervisors, employees, customers, owners, and others present at the worksite.

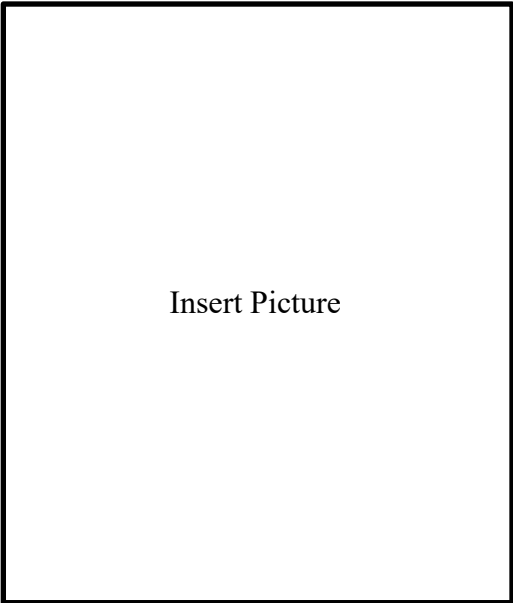
A sound H&S Management System assigns responsibility for the management of Health and Safety issues to key groups of individuals within the company. This internal responsibility forms the foundation for proactive H&S management. No activity is worth an injury to any person, damage to the environment or property.

Each member of the **JCW Safety Solutions** Team has the responsibility for health & safety protection of themselves, other workers present and environmental compliance. It is the responsibility of all line management and supervisors to ensure that work under their control is carried out in a safe and environmentally responsible manner, and that workers have the necessary training, competency, and tools in order to conduct their work in accordance with Health and Safety considerations.

All workers, both labour and management, need to understand their responsibilities under the applicable Occupational Health and Safety Act and be held accountable for complying with the rules as well as **JCW Safety Solutions** related policies.

5.1 Expectations

- Take reasonable care to protect the health and safety of themselves and other workers present at the worksite
- Support the H&S Management System by proactive involvement and co-operation
- Lead, direct and support the H&S initiatives with **JCW Safety Solutions**
- Plan, set and support H&S goals and objectives
- Line management and supervisors to ensure that work under their control is carried out in a safe and environmentally responsible manner
- Seek help from the H&S Team when required, and
- Every worker understands they have the right to refuse work that they perceive to be dangerous to themselves or others.



5.2 Key Documents

- Organization Charts
- Position Descriptions
- Roles and Responsibilities as identified in H&S Work Practices



6.0 TRAINING AND BEHAVIOUR

Working safely and within an environmentally responsible manner is a learned skill which applies to every employee within **JCW Safety Solutions**. As a result, knowledge, skills, and abilities (KSA) are essential to strong H&S performance. Managers and employees will have the KSA to perform their tasks in an efficient and responsible manner. Training will be provided to develop the appropriate KSA, as well as behavioral competencies such as communication and team working.

In addition to sending a clear message about the culture, values, and expectations regarding H&S at **JCW Safety Solutions**, training ensures that **JCW Safety Solutions** provides support for our employees to achieve a high level of competence in their job.

JCW Safety Solutions has implemented a training program to ensure employees are competent to do their assigned work through a list of job titles and their minimum qualifications requirements along with documentation and verification of employee qualifications for those job titles.

The level of training required shall be based on the degree of risk and the complexities of the actions required to control or mitigate the particular risk. The main goal of a training program is to ensure all employees and supervisors are competent.

6.1 Worker Competency

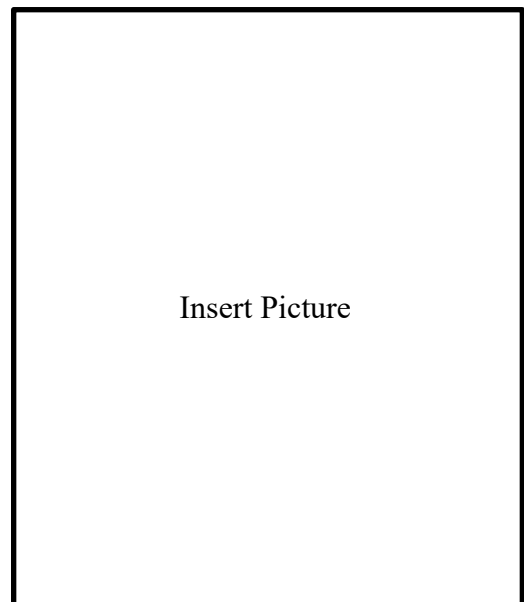
JCW Safety Solutions is responsible for determining if their employees are competent or not, using the definition below. Jurisdictions have slightly different ways of defining competent, however there is generally three equally important parts as follows:

1. Adequately qualified (i.e., certificates, diplomas, degrees, tickets, trade qualifications etc.).
2. Suitably trained (i.e., on-the-job training, orientations, site-specific training, etc.); and
3. Sufficient experience to work with minimal or no supervision (i.e., observations, performance reviews, skills assessment, tests, etc.)

6.2 Assessment of Training Needs

JCW Safety Solutions training program addresses the specific requirements based on the seven common sources of training needs on any work site:

1. Job/Position task list
2. Hazard assessments
3. Hazard control requirements
4. Certificate Of Recognition or applicable requirements
5. Prime contractor requirements
6. Client requirements, and
7. Applicable legislation.





Implementation

Implementation

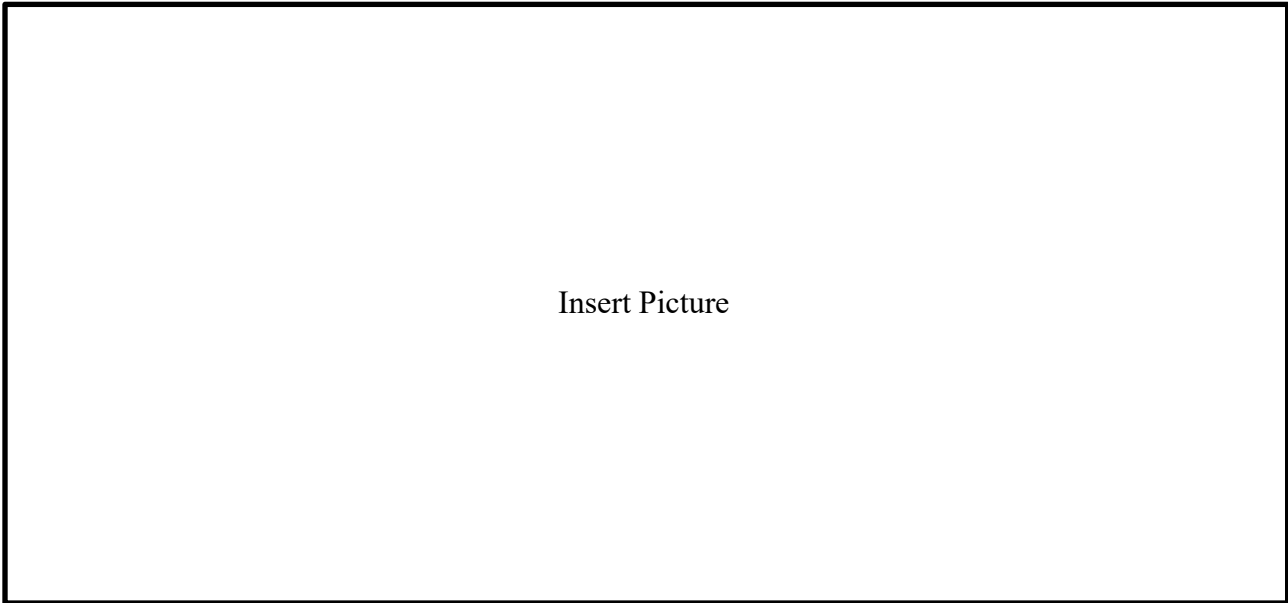
Implementation

6.3 Expectations

- KSA for each job title will be identified
- The level of training required will be based on the degree of risk and the complexities of the actions required
- Knowledge will be assessed after training to provide assurance that the training is effective
- Training and competency assessment will be documented for each person with requirements for refresher training identified
- Training will promote behaviours that will help prevent Health and Safety incidents
- Only qualified employees that have demonstrated competency in the required KSA for safe and efficient performance of their duties will be used in critical positions, and
- Induction training on H&S requirements and emergency instructions will be provided to visitors and contractors.

6.4 Key Documents

- Training Matrix (i.e., Safety Sync)
- H&S Training Plan





7.0 INFORMATION & COMMUNICATION

It is **JCW Safety Solutions** desire and intent to inform the employees of the company's H&S policy and procedure from the very beginning of each individual's employment. This is expected to enable them to conduct their work in a healthful, safe, and environmentally responsible manner and establish a foundation of good relations between the employees, the supervisor, the company, and our customers.

Communication serves to ensure all employees of **JCW Safety Solutions** receive critical information in a timely and efficient manner and serves to help create a culture of co-operation in the resolution of workplace H&S issues.

Communication of roles and responsibilities of workers and supervisors is important to ensure every employee within **JCW Safety Solutions** understands what he or she is expected to do on the work site.

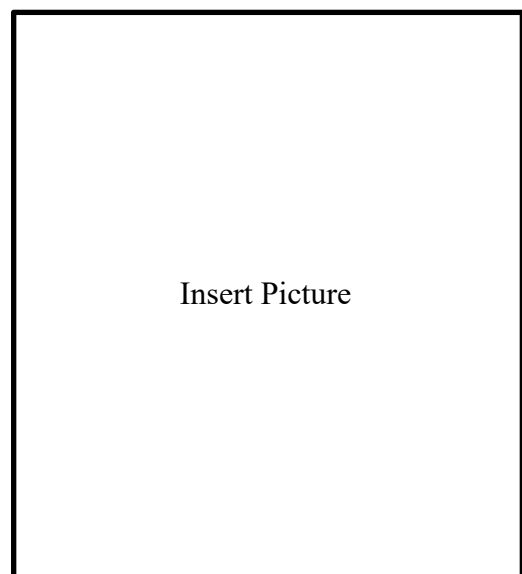
JCW Safety Solutions has implemented a communication process to facilitate internal and external communications on H&S related issues. Methods of communication include meetings, planned reports, both internal and external, and, as required, reports such as incident reports.

7.1 Expectations

- H&S related information is provided for communication to key stakeholders including personnel, shareholders, government departments, regulators, and communities
- Documented procedures are provided for operational control of staff and contractors
- Flash Reports are issued as necessary to raise awareness and inform on H&S matters
- Communications such as toolbox talks and pre-job tailgate meetings are used at the start of work activities to raise awareness, and
- Reporting of potential hazards and near misses is encouraged.

7.2 Key Documents

- Joint H&S Committee Terms of Reference
- Flash Reports
- Field Level Hazard Assessments (FLHA) or Pre-job Tailgate Meeting
- Toolbox Safety Training
- H&S Management Review Meeting
- Incident Review Meeting
- H&S Meeting
- Corrective Action Request Process





8.0 OPERATIONAL CONTROLS

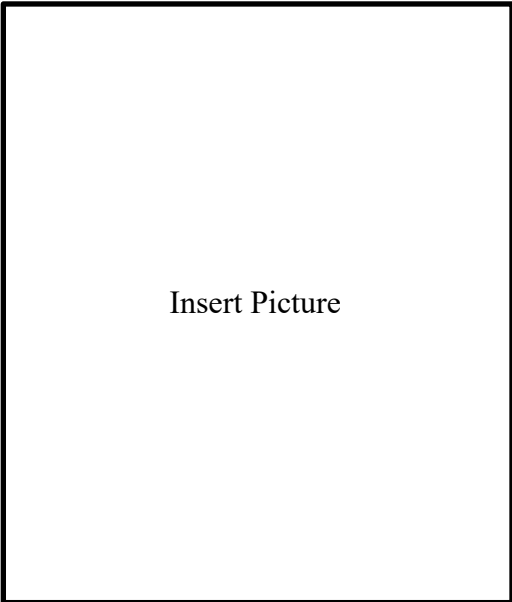
JCW Safety Solutions ensures effective Operational Controls are maintained to ensure that construction and operations activities do not adversely affect the health and safety of personnel, the environment, or impact neighboring communities. These Operational controls include:

- Standards – in essence, a standard is an agreed upon way of doing something. For example, this H&S Management Standard provides the standard expectations for effectively managing JCW Safety Solutions H&S Management System
- Practices – provide practical guidance to help workers understand and meet the H&S standards required by our legislation
- Procedures - support practices by detailing a series of actions to be conducted in a certain order or manner
- Rules – provide a set of explicit principles governing the conduct of our workers. Non-compliance with any defined rule will lead to disciplinary action up to and including termination of employment for cause
- H&S Plan – outlines how H&S policy will be implemented, and outlines H&S objectives and goals will be effectively achieved
- Programs - support long-term initiatives related to specific measures or activities
- Guidelines – are statements to determine a course of action. JCW Safety Solutions uses guidelines to make the actions of its employees more predictable, and of higher quality. A guideline is similar to a rule
- Meetings – can be used proactively or reactively to provide information or instructions to workers regarding an activity.

Supervisors and workers should work together on identification of the appropriate operational controls as this ensures worker participation. Often an activity is managed by more than one operational control.

8.1 Expectations

- Formal operational controls will be developed, maintained, and implemented to ensure that risks are either eliminated or adequately controlled for successful construction, manufacturing, and operations
- Informal operational controls will build upon the formal operational controls as to what can go wrong today, at this worksite while conducting this activity
- Supervisors will encourage worker participation in identification of operational controls





Implementation

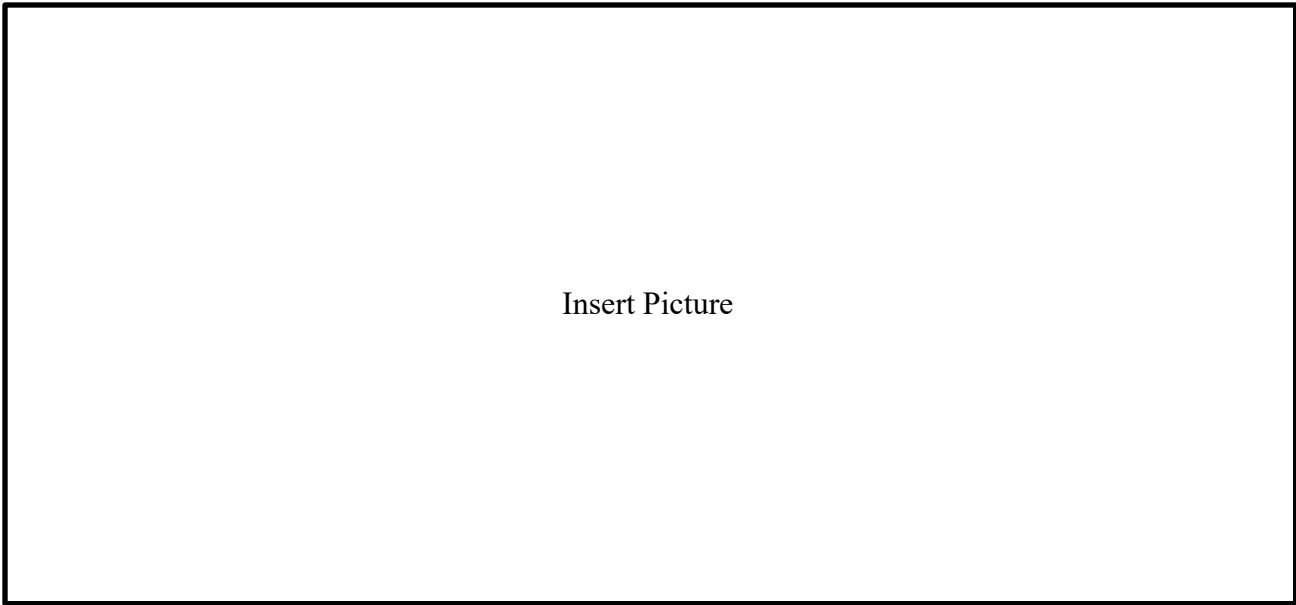
Implementation

Implementation

- Supervisors and employees must refer to federal and provincial health and safety legislation, industry practices, customer policy and site-specific requirements to ensure that the work is accomplished safely
- Contractors and consultants are required to have and follow accepted operational controls, and
- All major contracts will contain a general requirement that the contractor must ensure their H&S Management System meets with **JCW Safety Solutions** H&S Management System expectations or the contractor must comply with **JCW Safety Solutions** H&S Management System, including the requirement for operational controls.

8.2 Key Documents

- Life Saving Rules
- H&S Work Practices
- H&S Work Procedures
- Job Hazard Analysis (JHA – Formal Assessment)
- Field Level Hazard Assessments (FLHA – Informal Assessment)
- Project Specific Safety Plans (PSSP)
- Site Specific Emergency Response Plans (SSERP)





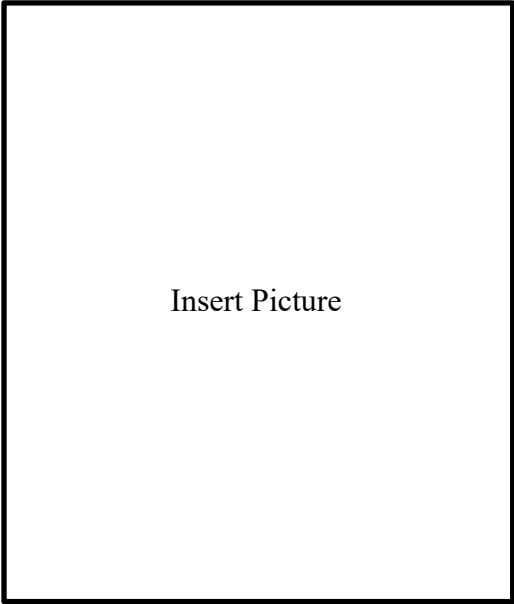
9.0 CONTRACTOR MANAGEMENT

JCW Safety Solutions requires Contractors to provide their services with the same level of Health and Safety performance as JCW Safety Solutions. Contractors are responsible for their own employees and sub-contractors and shall ensure subcontractor compliance with the following expectations.

Contractors shall strive to prevent injury to persons or damage to property or harm to the environment. In doing so they shall comply with all JCW Safety Solutions environmental and safety rules and standards and applicable federal, provincial, and local safety laws, rules, and regulations.

9.1 Expectations

- Ensure a program is in place to ensure Contractor:
 - Understanding and complying with JCW Safety Solutions H&S Management System
 - Understanding and complying with JCW Safety Solutions H&S Practices
 - Understanding and complying with their operating procedures
 - Understanding and complying with JCW Safety Solutions site rules
 - H&S implementation plans meet the requirements of JCW Safety Solutions H&S Management System
 - H&S operational controls comply with contractual requirements and government regulations
 - Workers are competent to do the work properly and have the appropriate tools, equipment, and training
 - Immediately notifies JCW Safety Solutions of non-compliance or potential non-compliance including any government regulatory or incident investigation
 - Immediately reports injuries and incidents, no matter how slight, (including property damage) to the JCW Safety Solutions supervisor or designated alternate, and
 - Field Level Hazard Assessments are developed and discussed during the toolbox meeting and periodically as conditions change throughout the day.
- Conduct regular inspections of the work site, reviewing Contractor’s H&S performance, and maintaining appropriate documentation of all H&S matters.



9.2 Key Documents

- Assurance Program
- Contractor Assurance Program (i.e., ISNetworld)
- Corrective Action Request Process



10.0 EMERGENCY READINESS

An emergency is defined as any unplanned occurrence resulting in or having the potential to result in death, serious injury, a threat to the safety of the public and/or **JCW Safety Solutions** personnel, major or significant damage to company, client, public or private property/operations. The occurrence could pose a potential impact to the environment.

Effective emergency management planning is fundamental to minimizing the impact of an incidental loss, the consequences of natural or man-made disasters or social unrest. Emergency action/response plans are maintained to cover all identified potential incidents. These plans identify the equipment, training, organization, personnel, and other resources necessary to protect the workforce, environment, the public and **JCW Safety Solutions** assets, including reputation. The emergency action/response plans are reviewed and updated on a regular basis to match **JCW Safety Solutions** and regulatory requirements.

10.1 Emergency Action/Response Plans

Workplace emergencies can happen at any time and prudence dictates that response procedures must be planned and prepared for in advance. Because it is hard to think clearly during an emergency, it is essential to plan our response.

Emergency planning is the first step, and it can be challenging even if the workplace only has a few employees. Determinations must be made as to what emergencies could affect our workplace, who will lead and make decisions during an emergency, and what procedures will ensure that employees respond appropriately. These elements are the foundation of our workplace Emergency Action Plan.

Emergency planning may not prevent emergencies, but it can protect lives, equipment, and property over the long term.

10.2 Expectations

- An Emergency Action/Response Plan has been developed based on the hazards and risks identified for **JCW Safety Solutions**
- Emergency action/response plans will be in writing, posted in the workplace, and available to employees for review. The names and job titles of every person in the chain of command will be posted
- A person designated by **JCW Safety Solutions** will ensure that all employees are informed and trained in the following minimum elements for Emergency Action Plans:
 - Procedures for avoiding a fire or other emergency
 - Procedures for emergency evacuation for all areas of work, including type of evacuation and exit route assignments
 - Safe assembly areas for all work areas in the event of evacuation
 - Procedures for employees who operate critical plant operations before they evacuate
 - Procedures to account for all employees after evacuation
 - Procedures to be followed by employees performing rescue or medical duties, and

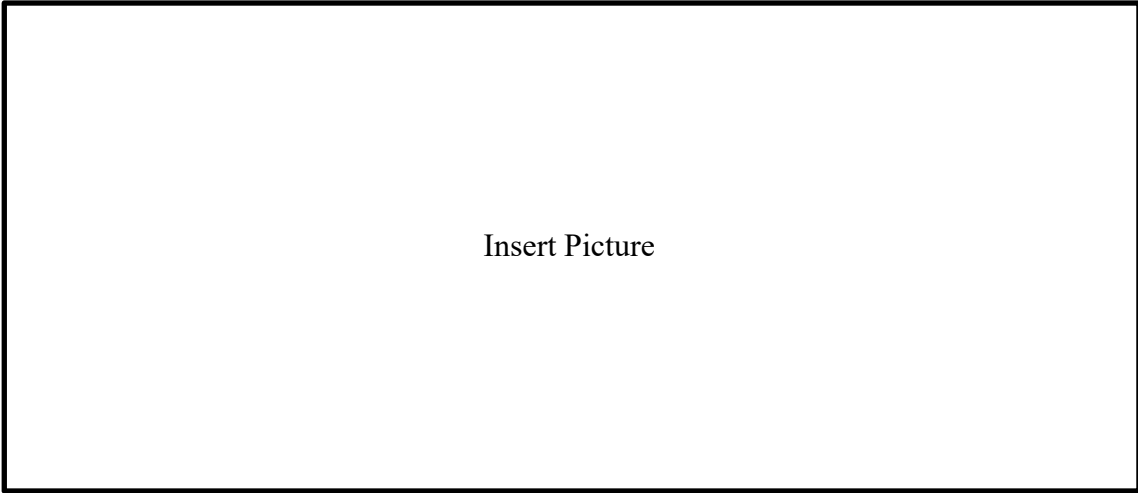


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- The members in the chain of command who may be contacted by employees who need more information about the Plan or for an explanation of their duties under the Plan.
- Emergency action/response plans will be reviewed and updated as necessary whenever there are changes to operations, equipment and/or personnel
- A formal review of the emergency action/response plan will be conducted following any emergency to assess its effectiveness and determine if revision is required
- The Emergency Action/Response Plan depicts the flow of information between **JCW Safety Solutions** and their primary stakeholders as well as acting as the umbrella document under which all the other plans (e.g., contractor’s plans) operate
- Periodic drills are conducted to test and improve the effectiveness of emergency response procedures and capabilities
- That resources, including materials, equipment and proper training are in place to deal with potential emergencies at the workplace
- The Emergency Action/Response Plan shall be audited with any change in legislation, company policy, or updates with applicable federal and provincial standards
- All employees of the Company, its contractors, site vendors, and visitors shall comply with the Emergency Action/Response Plan within any operational area of the Company
- Project Manager to be aware of the client’s safety procedures. The Company, its clients, vendors, and sub-contractors must have a clear and concise knowledge of what to do in the event of an emergency, and
- Conflicting rules and regulations must be discussed and agreed upon for the protection of workers, the public, the environment, and surrounding facilities.



10.3 Key Documents

- Emergency Response Plan(s)



11.0 INCIDENT INVESTIGATION, ANALYSIS AND REPORTING

Incident investigation, analysis and reporting is an important component in the improvement process. It helps to establish the facts on what went wrong and why thus enabling corrective actions to be identified and implemented.

JCW Safety Solutions is committed to appropriately investigating all near misses and incidents according to their actual severity or potential risk to determine incident (direct, indirect & root) causes, report its findings, share learnings and implement appropriate corrective actions to reduce the likelihood of recurrence and improve performance. Personnel are required not only to report all incidents, but also to report potential hazards and near misses.

The incident reporting process for **JCW Safety Solutions** requires that all near misses and incidents are reported in a timely manner. The general reporting structure is for workers to report incidents to their supervisors, and the supervisors report to the project managers and H&S team. Incident reporting forms are used to record incidents, and these are forwarded to **JCW Safety Solutions** H&S Representatives.

Investigations are a methodical examination of the facts of an incident that resulted, or could have resulted in injury, illness, or loss.

Investigations are conducted not to find blame, but to determine (direct, indirect & root) causes and ultimately determine corrective actions or controls designed to prevent a recurrence of the incident.

11.1 Imminent Danger Investigations

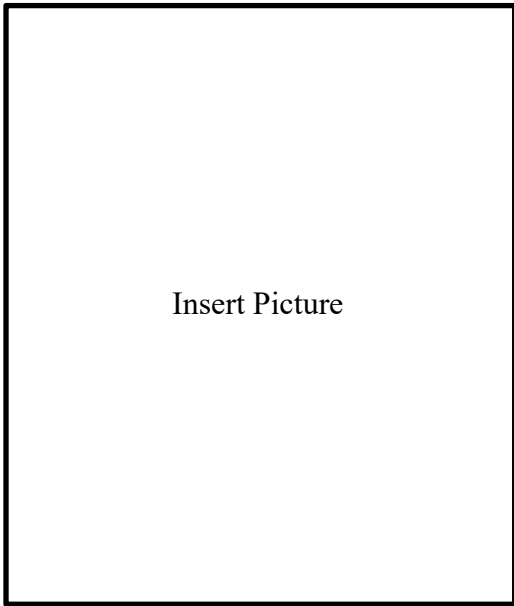
All workers of **JCW Safety Solutions** have a responsibility to refuse work that they consider being imminently dangerous.

When a worker notifies their immediate supervisor that they are refusing work that they consider to be imminently dangerous, work will be stopped and the worker and supervisor must discuss the refusal, conduct a hazard assessment, and determine the nature of the refusal.

If the refusal is a result of skill or personal reason, and another worker can safely complete the work, the incident must be documented as a near miss, reported, and work can continue.

If the work cannot be safely completed, and a worker continues to refuse due to imminent danger, the H&S Manager must be notified to lead an investigation in the refusal of work.

Under no circumstances will any retaliatory action be used against any workers who refuse to perform a task that he or she feels will put themselves or others at risk.



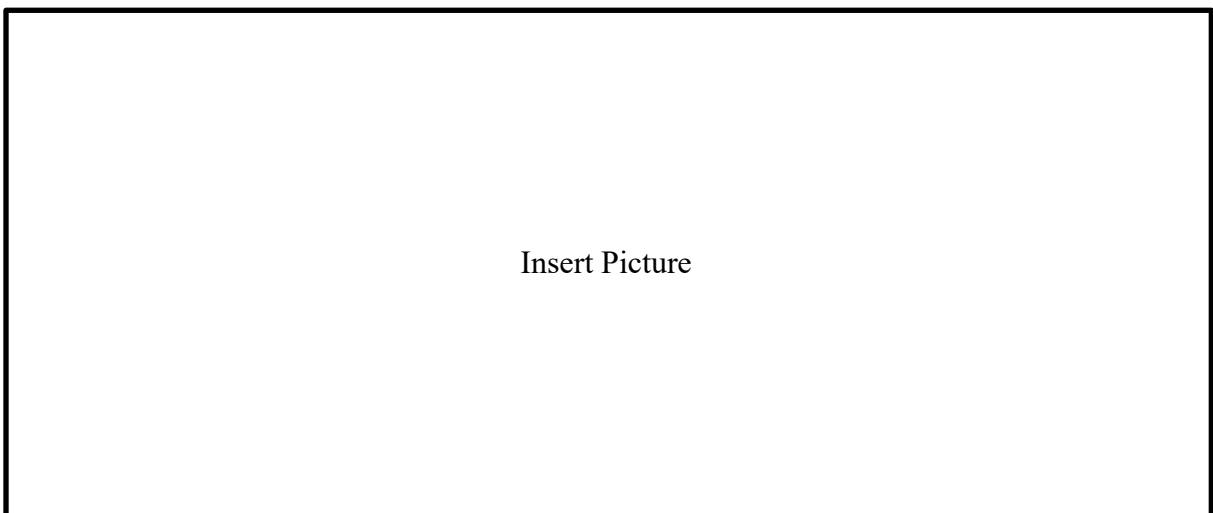


11.2 Expectations

- Employees and contractors are required to report all incidents, potential hazards and near misses
- Incident investigation and reporting is a responsibility shared between the Company and its employees
- A formal incident investigation procedure will be used to guide incident investigations
- A formal analysis of the facts revealed in the incident investigation report will be used to establish the direct, indirect and root causes
- Corrective actions will be recommended based on the direct, indirect and root causes to prevent similar incidents and reoccurrences
- The corrective actions will be implemented over a defined time period and a tracking report will be maintained to monitor implementation against plan
- Training will be provided to personnel on incident investigation, analysis, reporting and corrective actions
- Lessons learned are shared in a timely manner
- Any communication of incidents to the authorities is conducted only by the representing department Manager in conjunction with the H&S Manager, and
- Any communication of incidents to the media is conducted only by the Corporate Communications Director.

11.3 Key Documents

- Incident Management Process
- Incident Reporting Database
- Risk Assessment and Control Safe Work Practice
- Corrective Action Request Process





12.0 TRACKING AND ASSURANCE

Measuring and monitoring are essential to provide an indication of performance against goals, objectives, and targets. Measuring and monitoring of leading indicators allows modification of behaviours and processes proactively to respond to changing conditions. Measuring and monitoring of lagging indicators allows H&S performance to be objectively assessed and benchmarked. Measuring and monitoring indicate effectiveness of operational controls and allows corrective actions to be identified if performance is below target.

JCW Safety Solutions will set realistic goals, objectives and targets, based on previous performance and expected outcomes to provide a focus form and a measure of the proactive H&S efforts of company personnel.

These goals, objectives and targets will address incident frequency, levels of training, internal/external audit scoring and improved disability claims management. These goals, objectives and targets must include injury reduction strategies, initiatives and activities that focus on the ultimate goal of zero incidents.

12.1 Audits

Audits provide a formal review of the H&S Management System and performance in relation to the system. Audits provide the opportunity to collect measurable information and use that information to provide improvement in H&S performance. Internal and external audits can provide the correct mix of observations. **JCW Safety Solutions** conducts the following types of internal and external audits:

Level 1 Audits are construction site, infrastructure, and work site inspections conducted by supervisors and/or H&S Representatives to review compliance with **JCW Safety Solutions** policies, standards, government regulations, and industry best practices under the H&S Management System.

Level 2 Audits are conducted by the H&S Department to review compliance with the H&S Management System and H&S Performance. These audits include H&S Culture based audits on contractors.

Level 3 Audits are conducted by external agencies (COR, DOT, ISO, etc.) to review alignment of the H&S Management System with standards/legislation requirements.



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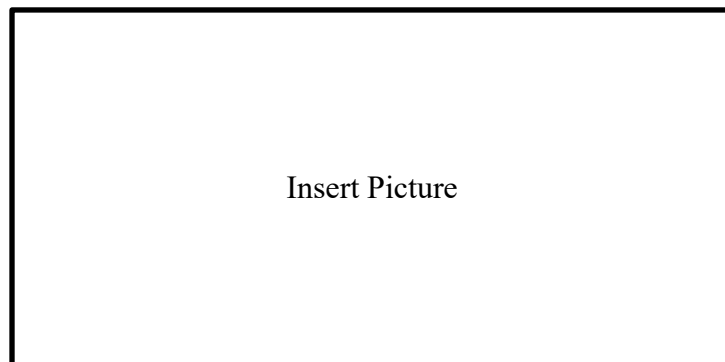


12.2 Expectations

- Monitor and evaluate the effectiveness of the H&S Management System
- A suite of leading indicators, lagging indicators and key performance indicators have been selected for measuring and monitoring:
 - Leading indicators include scheduled training, number of audits, job observation, critical task analysis, risk management, and contractor evaluations, number of potential hazards and near misses reported
 - Lagging indicators include perfect days, lost time incidents, medical or first aid treatments, environmental spills, non-conformance, temporary work suspension notices, corrective action requests, work improvement notices. Also, recordable / reportable incident rates and workhours since last lost time incident
- Measuring and monitoring is carried out on a continuous basis against key performance indicators
- Results are published monthly against key performance indicator targets
- Environmental monitoring when needed will be established for sampling and analysis of environmental parameters to ensure compliance with regulations and standards and to identify trends in environmental quality
- Health monitoring programs will be established for chemical exposure, respiratory protection, hearing conservation and other occupational hazards
- Periodic formal audits will be carried out by internal and/or external auditors
- Compliance will be monitored, and corrective actions recommended and implemented as a result of non-compliances, and
- **JCW Safety Solutions** monitors major contractor performance against contractual requirements and implementation plans.

12.3 Key Documents

- Key Performance Indicator Program
- Health and Safety Monthly Report
- H&S Assurance Plan





13.0 H&S ASSESSMENT & IMPROVEMENT

JCW Safety Solutions routinely evaluates its H&S Management System for effectiveness and efficiency in order to assure its H&S Standards are met. The ongoing management review of the H&S Management System helps to ensure continuing suitability, adequacy, and effectiveness of the H&S programs.

JCW Safety Solutions has implemented a Management Review process to secure the improvement loop “Plan-Do-Check-Act” and assess the H&S Management System’s strengths & improvement opportunities and determine if there is a need to adjust policies, goals, objectives, targets and standards of operation. The review process takes into account the results of performance measures, inspections, leading & lagging indicators, and audits.

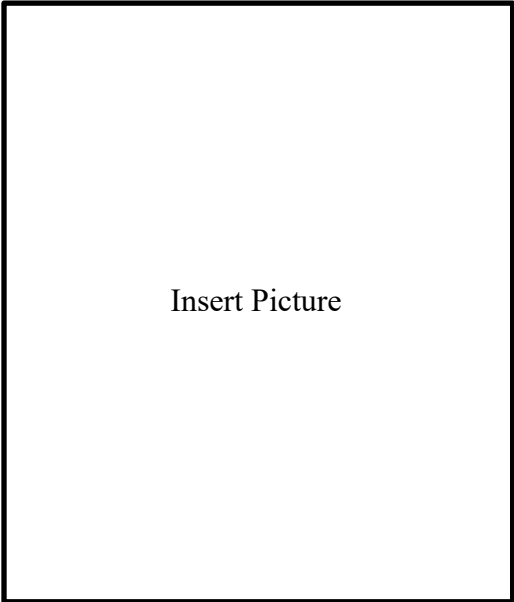
JCW Safety Solutions accepts responsibility for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe work conditions

13.1 Program Goals, Objectives, and Targets

Why have a workplace “Safety and Health Plan”? Taking risks is part of running a business. You take risks in product development, marketing, and advertising in order to stay competitive. However, some risks should never be taken. One of these is risking the safety and health of workers. Safety begins at the top and goes downward throughout The Company. The primary goal of JCW Safety Solutions is to continue operating a profitable business while protecting employees from injuries or illness. This primary goal can be achieved by defining Specific, Measurable, Attainable, Realistic and Timely (SMART) objectives and targets, measuring those objectives and targets against performance, making the required adjustments and delegating responsibility and accountability to all involved in JCW Safety Solutions operation.

Benefits of Achieving our Goals are:

- Elimination of injuries and incidents
- Elimination the loss of property and equipment
- Elimination of potential fatalities
- Elimination of potential permanent disabilities
- Elimination of potential fines
- Reductions in Workers’ Compensation costs
- Reductions in operating costs
- Improved productivity
- Sustainability and longevity as a business, and
- Having the best “Safety and Health” conditions possible in the workplace.





Note: Production is never so urgent that we cannot take the time to do our work safely

13.2 Expectations

- **JCW Safety Solutions** Senior Management, Environmental Vice President, Health and Safety VP/Director(s) shall review the H&S Management System on a regular basis
- Create actions to be completed following the H&S Management System review to encourage continuous improvement. Assign these actions to workers and track their progress with the action tracking system
- **JCW Safety Solutions** Senior Management, Environmental Vice President, Health and Safety VP/Director(s) shall review and discuss significant incidents and recommended corrective actions through monthly/quarterly incident review meetings
- Supervisors are responsible for developing proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves
- Employees are responsible for wholehearted, genuine operations of all aspects of the H&S program – including compliance with the rules and regulations – and for continuously practicing Health and Safety responsible procedures while performing their duties
- Confirm that corrective actions have been properly closed out
- Establishing SMART goals, objectives, and targets for each year
- Leading Indicators are identified based on Lagging Indicator Performance, and
- Review of H&S resources to achieve the performance commitments

13.3 Key Documents

- External Audit(s)
- Internal Audit(s)
- H&S Assurance Plan
- Corrective Action Request Process

