SUB TRADE POLICY HANDBOOK







LEADERS IN CIVIL CONSTRUCTION





SAFETY IS EVERYONE'S RESPONSIBILITY

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All general duties of employees and workers are governed by the Occupational Health & Safety Act and Regulations.

A complete company Workplace HSE Manual is available to you at all times. There is a copy in the jobsite trailers and main office. Safe Work Practices as well as full coverage of all our company policies are covered. Please familiarize yourself with this manual.



INTRODUCTION

The **ALLAN CONSTRUCTION** policy is to apply the Health and Safety System to those Sub trade personnel, operations and activities at all ALLAN projects. The objective of the ALLAN Health and Safety System is to meet the following:

PLAN SAFETY:

- to maximize personal safety
- · to prevent property damage
- · to avoid loss of production

TRAIN SAFETY:

- to establish automatic precautions
- to make every employee aware of possible hazards.

PERFORM SAFETY:

- by instruction of all personnel
- · by use of protective equipment

TOOL SAFETY:

- use safe tools and equipment
- · provide adequate maintenance for tools and equipment

PROMOTE SAFETY:

- by personal habits and practices
- · by constant supervision for safe practices

COMPLIANCE:

 Develop procedures/policies/practices that comply with current Occupational Health & Safety Requirements.

The active participation of all of our sub trade employees in contributing to the overall effectiveness of our safety program is expected and appreciated. Any employee who feels he or she has a suggestion which may help us to improve our safety program is encouraged to speak with their supervisor or one of the Partners. Your suggestions and input toward making ALLAN a safer place to work will be welcome.

This manual has been prepared for use by all ALLAN employees.

Remember, "Safety is not just a way of life – it is for life"



COMPANY HEALTH & SAFETY POLICY

*This information does not take precedence over O.H. & S. All employees should be familiar with the O.H. & S. Act and Regulations.

ALLAN is committed to a strong safety program that protects its staff, its property and the public from accidents.

Sub trade employees at every level, including management, are responsible and accountable for the company's overall safety initiatives. Complete and active participation by everyone, every day in every job, is necessary for the safety excellence the company expects. Management supports coordination of safety among all workers on the job site.

Sub trade management supports participation in the program by all employees and provides proper equipment, training and procedures. Sub trade employees are responsible for following all procedures working safely, and, wherever possible, improving safety measures.

An injury and accident free workplace is our goal. Through continuous safety and loss control effort, we can accomplish this.

Safety is an all-important function of our daily work.

PERSONAL PROTECTIVE EQUIPMENT POLICY

It is the policies of ALLAN to have all workers use the proper **Personal Protective Equipment (PPE)** when and where required. All sub trade employees will wear hard hats, safety glasses, steel-toed boots, long trousers, short sleeve shirts, and gloves. All PPE will need to be supplied by the Sub trade Company.

All PPE used will be in good condition and maintained according to manufacturer's instructions. All company-supplied PPE will conform to Occupational Health and Safety requirements.

GENERAL SAFETY RULES

Mandatory Requirements

- 1. Wear hard hats, safety boots(met guards) and safety glasses at all times in all work areas
- 2. Report to your supervisor all substandard practices, substandard conditions and near miss incidents.
- 3. Report immediately all accidents resulting in injury or property damage
- 4. Perform all work in accordance with company and site safety policies and rules and your supervisor's directions
- 5. Maintain good housekeeping in your work area
- 6. Operate all vehicles and mobile equipment in accordance with site rules and highway regulations
- 7. Obtain prior approval from your supervisor before bringing guests onto a work site. Visitors to worksites must be escorted by a staff member and must obey company and site safety rules at all times.

Prohibitions

The following are prohibited at all times on all company property and all company jobsites.

- 1. Possession or consumption of alcohol or illegal drugs
- 2. Possession of ammunition or weapons of any kind



- 3. Fighting, horseplay, practical jokes
- 4. Theft, vandalism
- 5. Damaging, disabling, altering or interfering with safety, firefighting or first aid equipment
- 6. Arriving for work or remaining at work when ability to perform the job safely is impaired

RIGHTS AND RESPONSIBILITES

Sub trade Worker's Responsibilities Include the Following:

- Responsibility to work in compliance with OH&S Acts & Regulations
- Responsibility to use PPE and clothing as directed by the employer
- Responsibility to report workplace hazards and dangers
- Responsibility to work in a manner as required by the employer and use the prescribed safety equipment

Sub trade Supervisor's Responsibilities:

- · Must ensure that workers use prescribed protective equipment devices
- · Must advise workers of potential and actual hazards
- Must take every reasonable precaution in the circumstances for the protection of workers

Sub trade Employer's Responsibilities:

- Establish and maintain a joint Health & Safety Committee, or cause workers to select at least one health and safety representative
- Take every reasonable precaution to ensure the workplace is safe
- Train employees about any potential hazards and in how to safely use, handle, store and dispose of hazardous substances and how to handle emergencies
- Supply PPE and ensure workers know how to use the equipment safely and properly
- Immediately report all critical injuries to the government department responsible for OH&S
- Appoint a competent supervisor who sets the standards for performance, and who ensures safe working conditions are always observed

EVERYONE's Responsibilities Include the Following:

- Right to refuse unsafe work
- Right to participate in workplace health and safety activities
- Right to know or right to inform of actual and potential dangers in the workplace

SUBSTANCE ABUSE PREVENTION PROGRAM

WHO IS AFFECTED BY THESE RULES?

All workers in safety sensitive positions will be subject to the Substance Abuse Prevention Program.

WHAT DRUG or ALCOHOL TESTS ARE REQUIRED?

Post-Accident – conducted after accidents or near misses on workers whose performance could have contributed to the accident

Reasonable Suspicion – conducted when a trained person observes behavior or appearance that could be characteristic of alcohol or drug influence

The drug rules prohibit having any unauthorized controlled or illegal substances in your system while at work. The rules also prohibit selling, possessing illegal substances and the possession of drug paraphernalia on Company premises and vehicles.



CELL PHONE POLICY

Only Company issued cell phones are to be used on the job sites. Personal cell phones will be left in job trailers while on the job site, and only used at designated breaks.

The exception to the policy will be for emergency situations. Please have this conversation with your supervisor. Your company should issue contact names to workers so that in the case of an emergency their families can contact them through their Supervisor's phone number.

While driving company vehicles Sub trade workers will let voice mail pick up incoming calls, or pull safely to the side of the road to answer or make calls.

The ALLAN disciplinary policy will be in effect for non-conforming workers. The idea behind this policy is to have a workplace free of unnecessary distractions during work hours. This will lead to a safer, more productive work place for all workers.

SOCIAL MEDIA POLICY

Sub trade employees who maintain personal social media pages/accounts are required to comply with the following guidelines as they relate to their association with ALLAN. Employees will be held accountable for what they write or post on social media/internet pages.

Posts involving the following are prohibited:

- Photos or videos of ALLAN worksites or employees
- Proprietary and confidential company information
- Derogatory statements regarding the company, its employees, customers, competitors, or vendors

These actions are prohibited and will subject the employee to disciplinary action up to and including dismissal. This policy is not intended to interfere with the private lives of employees. It is designed to ensure that the ALLAN image and working relationships are maintained and remain upheld.

DRESS CODE POLICY

While each worksite will have specific PPE and work wear requirements, the following guidelines are expected of ALL Sub trade <u>field employees</u> including <u>site administrative staff</u>:

- · No holes, rips, or tears in clothing
- Short sleeved shirts at minimum
- Close toed shoes (NO SANDALS)
- No rings or dangling jewelry; Stud earrings only
- Watches must be able to break away in case they are caught on something
- · No clothing with profane or inappropriate images/wording

All site specific PPE requirements will take precedence over these guidelines. Contact your supervisor for site specific protocol and refer to the employee handout for each site's specific requirements.



INVESTIGATION POLICY

Purpose

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

Policy

At ALLAN Construction, the following types of incidents shall be investigated.

- 1. Incidents that result in injuries requiring medical aid. Visits to the site nurse/EMT/Dr.
- 2. Incidents that cause property damage or interrupt operation with loss exceeding \$500.
- 3. Near miss that have the potential to result in (1) or (2) above
- 4. All incidents that, by regulation, must be reported to Occupational health & Safety, the Workers Compensation Board of other regulatory agencies.

Responsibilities

- 1. All Sub trade workers shall report ASAP all incidents/near misses to their immediate foreman/supervisor.
- 2. Foreman/Supervisor to notify their ALLAN Safety, Supervisor, and the owner reps. ASAP, if a near miss or an incident has occurred, or per site policy.
- 3. The Sub Trade foreman/supervisor will appoint someone to accompany injured worker to medical attention.
- 4. Foreman/Supervisors shall conduct initial investigations if Safety Person is not on site. Then submit their reports to their Safety Officer promptly. (**Prior to the End of the work day**).
- 5. Foremen/Superintendents along with Safety person shall determine the need for and, if necessary, direct detailed investigations. They shall also determine causes, recommend corrective action, and Safety person will report to the Manager.
- 6. The Manager shall review all incident/near miss reports, and ensure along with the safety person that the recommended corrective action is implemented.



DISCIPLINARY POLICY

Disciplinary and Appeal Policy: ALLAN discipline and appeal policies are intended to be corrective rather than punitive, placing the emphasis on identifying the reasons why a sub trade employee is not conforming to established standards of performance or behavior, and ensuring the employee's viewpoint is considered in the resolution of the situation.

Disciplinary Procedure: The purpose of this procedure is to provide a basis for ensuring fair and consistent handling of all situations in which disciplinary action may be deemed necessary, and to identify and correct situations where there may be barriers which prevent sub trade employees from meeting company standards.

Verbal Warning: When a sub trade employee violates a regulation or fails to meet established performance standards, the immediate supervisor will discuss the matter with the employee to hear the employee's side of the issue and explain the reason for the regulation or standard. The supervisor will end the discussion in a positive manner, stating that the incident is over and it is expected that the employee will live up to the standards and continue to do a good job. A summary of the discussion between the employee and supervisor will be included in the employee's personnel file.

Written Warning: If the sub trade employee repeats the same infraction, or a different one, the supervisor will prepare a written warning, which will be delivered to the sub trade employee. (Note: where the employee's signature is required to acknowledge receipt of the written warning, the signature does not indicate agreement with its contents.) A copy of the written warning will be retained in the employee's personnel file. The employee may also be suspended to consider the situation. Where a suspension is implemented, the employee will report to the immediate supervisor at a pre-arranged time prior to returning to work. In most cases, an employee will be given three warnings prior to their employment with ALLAN Co. being terminated. The three warnings may be in any combination of verbal and/or written form. Depending on the seriousness of the incident, the warning process may be by-passed completely (for example, fighting, gross negligence, harassment, horseplay, theft, etc.), and immediate suspension or dismissal implemented.

Appeal Procedure: The purpose of this procedure is to provide a system through which an employee can discuss a problem or concern and is assured that the problem will either be resolved, or an explanation of why changes cannot be made will be given. The system is designed to resolve concerns between levels of supervision; in other words, an employee can go around the immediate supervisor without fear of recrimination if the employee perceives the supervisor to be the problem. ALLAN management team is committed to assisting employees in removing barriers to performance and effectiveness.

If an employee wishes to have something explained to them, or disagrees with a policy, procedure or condition, the employee should discuss it with their immediate supervisor. The supervisor will listen to the employee's viewpoint, and then explain why things are the way they are or initiate change. If the employee is not satisfied with the explanation or feels the issue is still unresolved, he or she is encouraged to speak with one of the ALLAN Partners.



CARDINAL RULES POLICY

Blatant disregard of the following rules could be grounds for immediate dismissal... (REFER TO 13.001 IN WORKPLACE HSE MANUAL FOR MORE INFO)

- 1.
- 2. Failure to use site specific "Specialized PPE" where required
- 3. Failure to tie-off or use fall protection where required
- 4. Failure to follow proper Permitting Procedures (i.e. excavations, confined space)
- 5. Failure to use Lockout Tag out where required

HARASSMENT AND VIOLENCE POLICY STATEMENT

ALLAN Construction believes that all of our employees have the right to work in an environment free from all forms of harassment.

"Harassment" is defined as any inappropriate conduct, comment, display, action or gesture by a person:

(i) that either;

- a. is made on the basis of race, creed, religion, color, sex, sexual orientation, marital status, family status, disability, physical size or weight, age, nationality, ancestry or place of origin, and
- b. subject to subsections {3} and {4} adversely affects the workers psychological physical wellbeing and that the person knows or ought reasonable to know would cause a worker to be humiliated or intimidated and constitutes a threat to the health or safety of the employee.

"Employee" is defined as any person (management or worker) who works for a wage or salary for our company.

We will make every effort to ensure that no employee is subjected to harassment/violence at any of our places of employment. Our management is committed to keeping to this policy, and to seeing that no employee causes or participates in the harassment of another employee.

PROCEDURE FOR DEALING WITH HARASSMENT CASES

- 1. Employees are encouraged to address alleged incidents of harassment internally.
- 2. An employee who believes that he or she has been subjected to harassment is encouraged to clearly and firmly make known to the alleged harasser that the harassment is objectionable and must stop.
- 3. Where circumstances prevent an employee from taking action, or the action taken is unsuccessful, the employee should report the alleged harassment to one of the following persons designated by ALLAN Construction to receive complaints of harassment.
 - Jody Materi Kevin Arneson Janis Dubreuil Kent Koller
- 4. ALLAN Construction will notify the alleged harasser of the complaint, provide the alleged harasser with information concerning the circumstances of the complaint, and undertake a confidential investigation.
- 5. Following the conclusion of the investigation, ALLAN Construction will inform the employee and the alleged harasser of the results of the investigation.



MAINTENANCE PROGRAM

All sub trade company construction activity involves people working with tools and equipment. In addition to ensuring that workers use the tools and equipment properly, it is vital that tools and equipment are properly inspected, maintained and kept in good repair. An effective maintenance program provides for monitoring, periodic checks and maintenance of equipment. This will minimize the risk of injuries, property damage and lost production due to equipment breakdown. The expertise of management and workers is essential in setting schedules and once set, it is essential that they are followed.

RECORDING AND MONITORING

At each scheduled maintenance date the appropriate procedures must be followed and recorded in a maintenance log. The exceptions to documenting maintenance are the "Disposable Tools". The worker will ensure that appropriate daily checks of the tools and equipment are done. Maintenance shop personal is responsible for maintaining the equipment and make sure the maintenance is done. Management must monitor the program to ensure that all are following company policy, and that the workers responsible for performing the maintenance work are qualified.

The operator that starts the PME for the first time in the day, will do the basic fluid checks and circle check of the PME. This will be recorded in the PME log book, filling it out as detailed as possible, including any deficiencies that may have been found. The white copy of the now filled log will be removed and handed into the foreman daily. The foreman is responsible for making sure that all of the required info from the white copies is entered into Tracker in a timely fashion. This will ensure that if any deficiencies exist or scheduled maintenance is needed with the equipment that they are prioritized and dealt with in a timely manner.

RESPONSIBILITY FOR TOOLS ON THE JOB SITE

When a tool is found defective through regular worker inspection that tool will be removed from service with a "Tag out Card", then the following steps must be followed:

The worker will return the out of service tool to the tool crib with the Out of Service Tag and notify their supervisor.

The supervisor will remove the tagged out tool from the tool crib and bring it back to the maintenance shop. The qualified ALLAN Construction shop worker or qualified 3rd party shop will make the decision if the repair is worthwhile or if tool will be discarded.

If tool is to be discarded the General Superintendent will be notified.



SAFETY TRAINING POLICY

Purpose

The purpose of this policy is to ensure that all employees receive adequate safety training.

Policy

The sub trade company will provide and ensure that all employees participate in the following safety training:

- 1. New Sub trade Safety Orientation
- 2. Job Specific Training
- 3. Safety Meetings
 - Morning co-ordination meetings will be held in the ALLAN Co. jobsite trailer. All sub trades and superintendents will be included in the meeting.
 - Job Hazard Assessments (JHA's) will be required for all new work. This will be completed with
 the worker's input. All employees will complete separate JHA's as required in the field for work
 deviations.
 - Daily tool box meeting will be held in the ALLAN Co. site trailer to review the relevant JHA's for the planned daily task.

INSPECTION POLICY

It is the policy of ALLAN Construction to maintain a program of safety inspection. The objective of this program is to control hazards in the workplace. All company facilities and job sites shall be included in the inspection program. Informal inspections shall be conducted by supervisors on an ongoing basis in their areas of responsibility. Formal inspections shall be conducted by the supervisor or designate at each facility or job site on a bi-weekly scheduled basis.



ORIENTATION QUIZ

- 1. Where would you find information on the emergency response plan?
 - A) Supervisor
 - B) Safety Advisor
 - C) Superintendent
 - D) Posted in job trailer
 - E) All of the above
- 2. Who is responsible for safety at your job site?
 - A) Superintendent
 - B) Foreman
 - C) All workers at all levels
- 3. What are the 3 basic worker rights?
 - A) The right to work indoors
 - B) The right to get paid
 - C) The right to know about hazards on your job site, the right to participate in OHS safety decisions, and the right to refuse work deemed unusually dangerous
- 4. When are you allowed to use your cell phone while on a worksite?
 - A) If you're expecting a call regarding a serious issue or if you're designated to have one for work related duties
 - B) Always
- 5. At any point on site would harassment or horseplay be allowed?
 - A) Yes
 - B) No
- 6. Where can you find the nearest ALLAN Co. Workplace HSE Manual?
 - A) Job trailers
 - B) Offices
 - C) Tool crib
 - D) All of the above
- 7. Which of the following are ALLAN Co. Cardinal Rules?
 - A) Failure to use site specific "Specialized PPE" where required
 - B) Failure to tie-off or use fall protection where required
 - C) Failure to follow proper Permitting Procedures (i.e. excavations, confined space)
 - D) Failure to use Lockout Tag out where required
 - E) All of the above
- 8. What is the minimum PPE required at all times while on site?
 - A) Hard hat
 - B) Safety glasses
 - C) Steel toed boots
 - D) Safety gloves
 - E) High vis. Straps or vest for chest
 - F) All of the above



- 9. What types of incidents should be reported to your supervisor?
 - A) Property damage
 - B) Environmental spill
 - C) Near miss incident
 - D) Minor injury
 - E) Death
 - F) All of the above
- 10. What is the proper procedure for dealing with defective tools?
 - A) Continue to use the tool until it explodes
 - B) Tag it out and place in a designated area for a competent person to decide whether the tool is salvageable or not
 - C) Place tool back in tool crib and grab a new one
- 11. Where can you find the Material Safety Data Sheet or Safety Data Sheet for hazardous or controlled products being used at work?
 - A) Ask your supervisor for the MSDS/SDS
 - B) Reference the MSDS/SDS binder in the job trailer
 - C) All of the above



SCORE /11





Please check off all topics covered d	uring your orientation meeting:
 { } Company Health & Safety Poli { } PPE Policy { } General Safety Rules { } Rights & Responsibilities { } Substance Abuse Policy { } Cell Phone Policy { } Social Media Policy { } Dress Code Policy 	cy { } Investigation Policy { } Disciplinary Policy { } Cardinal Rules Policy { } Harassment Policy { } Maintenance Program { } Safety Training { } Inspection Policy
l have read, understood, and agre	ee to the above topics as outlined in this orientation.
Sub Trade Company (Please Prin	t)
Sub Trade Employee (Please Print)	
Sub Trade Employee Signature	Date
ALLAN Rep. (Please Print)	
TEE TO TOOP. (1 10030 1 11111)	
ALLAN Rep. Signature	Date



ALLAN Construction Specific Rules:

- WHMIS required for site access
- Worker training Certificates to be made available to ALLAN Const.
- JHA/SWP to be in use for more hazardous, non-routine, work on site
- No trigger locks on hand held power tools, all guards and handles to be in place
- GFCI to be used in damp areas
- Flash back arrestors to be used on gauge and torch ends
- Extension ladder workers will need to maintain 3 point contact
- Fire ext. Required on all PME
- · Seat belt use on while operating PME
- · High vis. vest required on site
- Max. work height without fall protection is:
 - 3m from non-permanent structure
 - -1.2m from permanent structure
 - subject to owner site specific rules!
- Fall protection gear to have yearly inspection &documentation
- Fall protection gear to have daily inspection and doc. when in use
- Rescue Plan in place when using fall protection
- PME log books to be filled out daily
- Proper permits to be filled out prior to work being done: confined space, working at heights, excavation, critical lift, hot work
- All sub trade employees must wear steel-toed boots with met guard protection at Nutrien, Mosaic, and all other worksites that require met guard protection