



Health, Safety & Environmental Program Manual

CONTROLLED COPY

This manual is confidential. It may not be duplicated, copied or transferred to other persons or companies. The information in this program manual does not take precedence over applicable government legislation with which all workers should be familiar.

MANUAL DISPOSALS / REVISIONS:

The Health and Safety Manual is controlled electronically on the company's server. In the event that a hard copy is issued it will be identified with a manual copy listed name.

The Safety Officer of EIFFEL GROUP OF COMPANIES is responsible for the authorization and maintenance of the circulation list. It is the responsibility of the holder to maintain the copy.

As necessary, portions of the manual will be revised to reflect changes in operations or regulatory requirements. When revisions are issued, each issued manual will receive revisions.

The current Alberta Occupational Health and Safety Act, Regulations and Code Handbook are available/stored on all company issued cell phones.

Manual Copy Number	Original Document Holder
<u>Master</u>	Electronic
Office	Health & Safety Office
Storage	Storage Unit
Estimating	Estimating Office
Accounting	Accounting Office
Employee	See Current Employee List
Large Sites	Site PM

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ELEMENT 1 MANAGEMENT COMMITMENT



1.0 Corporate Health, Safety & Environmental Program

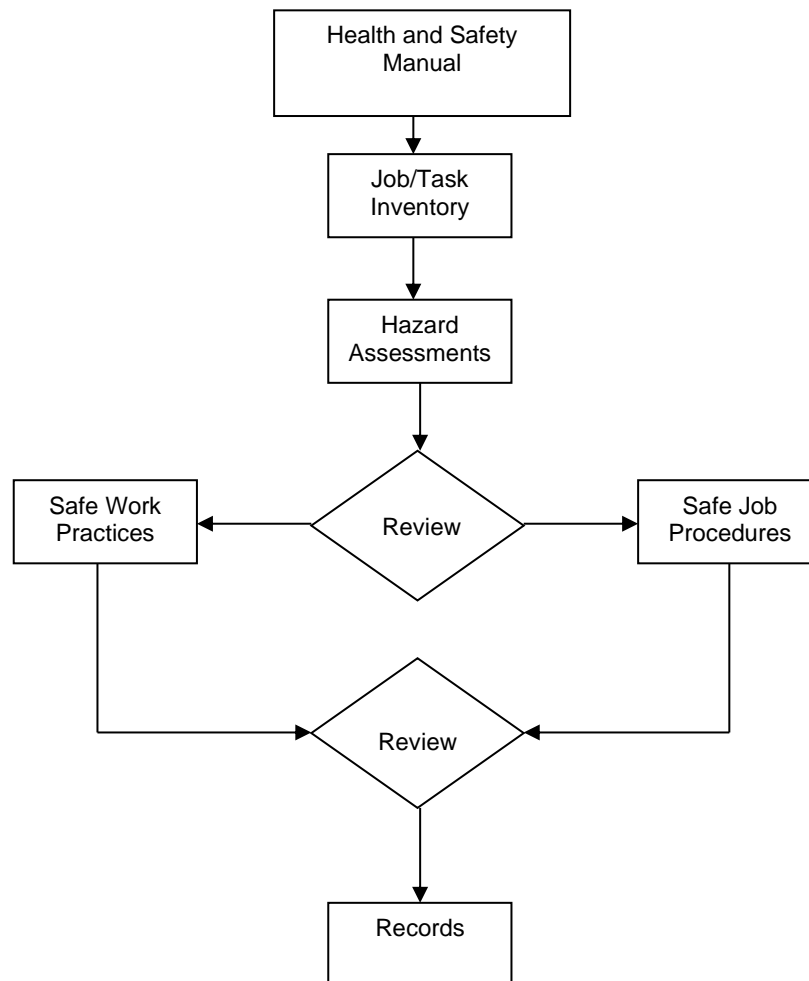
The Health, Safety & Environmental Manual at EIFFEL GROUP OF COMPANIES describes the Health, Safety & Environmental System implemented at EIFFEL GROUP OF COMPANIES – Your Custom Home Inc., Your General Contractor and Max Property Restoration Inc.

EIFFEL GROUP OF COMPANIES SAFETY SYSTEM

The purpose of this manual is to communicate and provide guidance to all levels of employees at Eiffel Group of Companies to work safely and efficiently, at the same time meeting the regulatory compliances.

The information in this document does not take precedence over any legislation. Always review applicable documents prior to beginning any work.

The following flowchart provides the inter-relationship of documentation used at EIFFEL GROUP OF COMPANIES.



SAFETY ELEMENTS:

Eiffel group of Companies Health, Safety & Environmental Manual Program consists of “Safety Elements” as required by the health and safety legislation of Canada. These elements are included in the program based on Eiffel’s needs and scope of work. All “Safety Elements” meets or exceeds minimum regulatory requirements.

SAFE WORK PRACTICES:

Safe Work Practices (SWP) are a set of guidelines or “Do’s and Don’ts” on how to perform a specific task that may not always be done in the same way. SWP’s have been developed to mitigate hazards that have been identified through the hazard identification process with team members including workers, supervisors and safety officers.

A formal review of all SWP’s shall be performed on an annual basis. As a reference, records of all review shall be kept on the company server under Health and Safety.

SAFE JOB PROCEDURES:

A Safe Job Procedure (SJP) is a written, specific step-by-step description of how to complete a job safely and efficiently from start to finish. SJP’s have been developed using the job hazard analysis process with team members including workers, supervisors and safety officers. All hazards identified through hazard identification process have mitigation plans.

A formal review of all SJP’s shall be performed on an annual basis. As a reference, records of all review shall be kept on the company server under Health and Safety.

FORMS:

Various types of “Forms” are available in Eiffel’s HSE Program. These forms shall assist each division to identify hazards, document training needs, workplace inspections, meeting minutes, safety meetings etc.

These forms have been designed in conjunction with the safety officers, management, safety committees / safety representatives as and where required.

The “Forms” shall be reviewed and revised accordingly as required. Eiffel HSE – Safety Manual Forms.

SAFETY DATA SHEETS:

Know the hazards associated with the materials you use! Always review chemical safety information, such as an SDS or other resource, before starting work with a new or unfamiliar chemical. Electronic versions are to be present at the worksite and copies emailed or link provided to the Safety Officer. Electronic versions will be kept on the company server and paper copies may be provided at the Office in SDS Binder.

SAFE WORK PLANS:

Where “Plans” are noted but not present within this document, they will be considered externally and independently of this manual. These “plans” will typically cover customer or legislative requirements per division location. It is the responsibility of the Safety Officer to ensure the specific plans are accurate and current, Eiffel’s Health & Safety Department shall be informed of any changes or document creation not included in Eiffel’s HSE Manual.

HEALTH, SAFETY & ENVIRONMENTAL MANUAL:

Eiffel’s Health, Safety & Environmental Policy shall be revised annually, and where required, updated in consultation with the Joint Health and Safety Committee, and Safety Representatives. The policy will also be reviewed and revised accordingly whenever there is an operational or organizational change.

The Health, Safety & Environmental (HSE) Program shall be reviewed annually and revised accordingly where applicable. In addition, the HSE program shall also be reviewed and revised where there is a change of circumstances that may affect the health and safety of workers. All changes shall be done in consultation with the safety representatives, safety officers and senior management.

This manual is to be reviewed and approved annually. **This HSE manual has been approved by:**



CEO – Daniel L. Loudon
EIFFEL GROUP OF COMPANIES

1.1 COMPANY HEALTH AND SAFETY POLICY

Safety is an integral part of Eiffel Group of Companies operations, and we are committed to protecting employees, other workers, clients, property, the environment and the public.

We care about our employees physical, psychological and social well-being and acknowledge that our people are our greatest asset. It is our objective to ensure that all our employees go home safely at the end of each day and recognize that they have the right to a safe and healthy work environment.

To achieve this objective, we will comply with all applicable Regulations, Acts and Codes and strive to implement safety and environmental programs that achieve a standard higher than those mandated by regulatory bodies.

We ensure that all levels of management and supervisors provide strong leadership, know how to identify and manage hazards and risks and lead by example. Their role is supported by input from all employees.

We know that safety is a shared responsibility, and we expect everyone who works at Eiffel to exhibit a commitment to a safe work environment, and we hold all management, employees and contractors accountable for the safety of themselves and their co-workers.

We recognize that safety statistics only tell part of the story and more important is what we do to prevent injuries and property damage each day. A focus on creating a strong safety culture, engaging all employees, and assessing and constantly upgrading our program will lead to improved safety throughout the company.

Eiffel Group of Companies considers environmental protection as being important to the operation of its business and is committed to ensuring none of its procedures will cause undue harm.

All employees and others on company worksites are responsible for obeying all safety rules, following recommended safe work procedures, wearing and using personal protective equipment when required, participating in safety training programs and informing supervisors of any unsafe conditions. Everyone has the right and responsibility to refuse to do any work when unsafe conditions exist.

We hold each other accountable for our actions.

Our goal is a healthy, injury free workplace for all workers. By working together, we can achieve this goal.

Great Safety, great operations and great customer service go hand in hand.

- The information in this manual does not take precedence over OH&S Act, Regulations or Code, or any other government legislation, with which all workers should be familiar.



CEO – Daniel L. Loudon
EIFFEL GROUP OF COMPANIES

(Signed copies of this Policy Statement are posted)

1.2 OCCUPATIONAL HEALTH & SAFETY RESPONSIBILITIES

It is the responsibility of every individual at Eiffel Group of Companies to understand and promote Health and Safety at work. Understanding and promoting safety builds a team and promotes an environment where we work together towards the success of the team and each other.

At Eiffel, all individuals shall:

Take care of each other. Taking care of each other means the following things:

- Ensuring that everyone goes home safe at the end of the day.
- Treat each other with respect and dignity.
- Be courageous. Part of taking care of each other means that we all have tough decisions to make sometimes. Being courageous means intervening when you see someone at risk. Whether it is a co-worker, a team member, or another employer at a customer site. Take the responsibility to ensure that they work safe. Stopping someone from being hurt is the ultimate form of taking care of each other.
- Act with integrity.

Be Innovative:

- Use your specific knowledge to push the envelope when solving problems.
- Push yourself to think differently about everyday issues that face the type of work we do.
- Re-conceptualize issues and develop practical solutions.
- Ask “why” Why do we do it this way? Is there a better way? Is there a safer way? Suggest workable solutions that solve the problem better by doing it more efficiently, more cost-effectively, and more safely.

SAFETY RESPONSIBILITIES

The purpose of the Occupational Health and Safety Legislation and the Worker’s Compensation Act and Regulation is to protect workers from health and safety hazards on the job. A hard copy and/or electronic access to the legislation will be readily available to all employees and subcontractors at the Company Office. While it is the responsibility of all workers to understand their obligations under the law, the following section summarizes some key areas of responsibility for employers and workers:

COMPANY RESPONSIBILITIES

Senior management is responsible for ensuring that:

- As far as reasonably practicable, the health and safety of all employees and contractors engaged in the work of Eiffel, visitors or those workers not engaged in the work of Eiffel Group of Companies, but present at the work site at which that work is being carried out.
- A Health and Safety Continuous Improvement Action Plan is in place to review trends and respond to Safety Committee and worker representative recommendations.
- An individual with knowledge of applicable legislation and experience with investigations and inspections is available to coordinate health and safety activities and maintain the Health and Safety Continuous Improvement Action Plan.
- Employees engaged in the work are aware of their responsibilities and duties under the Occupational Health & Safety Acts, Regulations and Codes.
- To ensure training needs are identified and met.
- To evaluate and monitor employee performance and adherence to the Health, Safety & Environmental Program; and where appropriate, apply disciplinary sanctions against employees that violate EIFFEL GROUP OF COMPANIES’s Policies, the Occupational Health and Safety Legislation and the Worker’s Compensation Acts and Regulations.

COMPANY REPORTING TO WCB

The employer has 72 hours to complete and submit an “Employer’s Report of Injury or Occupational Disease” form after receiving notice or knowledge of an injury or illness that disables or will likely disable a worker beyond the date of accident.

MANAGERS RESPONSIBILITIES

- Always place the safety of the workers ahead of everything else
- Develop and participate in a culture of caring.
- Establish the administration necessary for efficient safety program execution.
- Actively participate in and support hands-on involvement with site safety.
- Ensure that there is training and direct/supervision to ensure workers are competent to perform the tasks assigned to them.
- Ensure that all supervisors and workers are familiar with and promote Eiffel Group of Companies Corporate Health, Safety & Environmental Program, Policies and Procedures
- Ensure that employees are receiving New Hire Orientation prior to their first day at work.
- Ensure that PPE compliance is adhered to and that PPE is considered as the last line of defense.
- Promote the highest standards of safety throughout the company.
- Be active in the process of evaluating Health, Safety & Environmental Program effectiveness.
- Perform workplace and employee inspections and evaluations.
- Conduct safety information sessions and employee training.
- Correct unsafe conditions and discourage substandard acts.

SUPERVISORS RESPONSIBILITIES

Supervisors are responsible for the execution of the Safety Program. The responsibilities of supervisors include but are not limited to:

- Always place the safety of the crew ahead of everything else
- Ensure that all employees have received their safety orientations before their first day of work.
- Ensure that hazard assessments are being performed.
- Lead by example in the appropriate use of personal protective equipment at the work site
- Know and enforce safety policy, applicable legislation, and Safe Work Practices
- Before starting work, ensure that all work is planned, and hazards identified and controlled.
- Ensure that all workers understand risk management plans and comply with Safe Work plans
- Ensure that all workers are thoroughly educated and are aware of site and shop hazards.
- Ensure that no worker engages in work they are not competent to do safely.
- Conduct inspections for hazards and correct unsafe acts and conditions.
- Ensure compliance with all health and safety plans.
- Lead safety meetings with the crew and promote safety every day.
- Be honest and forthcoming when giving information relating to workplace health and safety.
- Report to the manager any contraventions of the Health and Safety Act or governing regulations, or the existence of any hazard the worker is aware of

WORKER RESPONSIBILITIES

Every worker shall, while engaged in an occupation:

- Take reasonable care to protect the health and safety of themselves and other workers who are working or present on the site or Eiffel Group of Companies offices.
 - Cooperate with the employer for the purpose of protecting the health and safety of themselves and everyone else present on the work site.
 - Maintain a safe workplace through compliance with the company's Health, Safety & Environmental Program, OH&S regulations and customer's safety policies.
 - Immediately remove from service any defective equipment and tools.
 - Cooperate with investigations of all accidents and incidents.
 - Wear prescribed PPE as per requirements.
 - Report all injuries no matter how minor, immediately to the supervisor, first aid and safety officer.
 - Attend and actively participate in safety meetings and attend any designated training.
 - Cooperate with the joint health & safety committee and safety representative.
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- Workers have the right to refuse dangerous work and imminent danger without fear of reprisal and/or discrimination.
- No worker shall carry out any work if, on reasonable, probable grounds, he believes that there exists imminent danger to the health and safety of that worker or anyone present at the work site.
- Where any worker has refused work on these grounds, an investigation will be conducted in accordance with provincial legislation.
- No one can take disciplinary action against a worker who is following the Act and Regulations. No person shall dismiss or take any disciplinary action against a worker by reason of that worker acting in compliance with OH&S legislation, the Regulations, or an order given.
- Understand that working safe is a condition of employment and the EIFFEL GROUP OF COMPANIES, expects you to follow all Company Safety Rules and Legislated Regulations, all Safe Work Procedure and Safe Job Practices, at all times.

EMPLOYEE REPORTING TO WCB

An injured worker needs to complete and submit a "Worker's Report of Injury or Occupational Disease" as soon as possible after the injury or illness. EIFFEL GROUP OF COMPANIES will provide detailed instructions and copies of these forms.

HEALTH & SAFETY ADMINISTRATOR'S RESPONSIBILITIES

- Coordinate and conduct safety trainings as per the requirements.
- Establish, schedule, and coordinate planned inspections of the work site.
- Participate in inspections and ensure that inspection reports are reviewed to identify repetitive items and underlying causes.
- Review and provide feedback to managers and supervisors on hazards assessments and risks faced at customer sites; then brainstorm and assist in implementing mitigation plans.
- Lead investigation teams and ensure that investigations are conducted in accordance with the regulatory requirements.
- Ensure that all requirements of the Health, Safety & Environmental Program are being carried out by all personnel, including sub-contractors, vendors and Eiffel Group of Companies employees.
- Coordinate, prepare, and implement orientation sessions.
- Review Hazard Assessments and near Miss Reports and provide feedback to crew.
- Report to CEO/Manager on safety issues and concerns that may require their involvement or attention.
- Monitor, evaluate, and take action on all sub-standard conditions and work practices.
- Provide topics, attend, and evaluate Tool-Box meetings and provide instructive guidance to the supervisors conducting the meetings.
- Participate in monthly safety inspections and ensure that inspection reports are reviewed to identify recurring items and underlying causes.

FIRST AID PERSONNEL

The persons appointed for this position must possess a valid certificate in first aid.

Responsibilities include the following:

- Administer first aid as required.
 - Maintain an accurate record of reported injuries on a First Aid Record Form and submit the report to the safety office.
 - Co-ordinate the transportation of injured worker to a medical facility.
 - Assist the Supervisors by giving them any relevant information that you may have about the injury for completing Incident Investigation Report when required.
 - Ensure no blood borne pathogens can be encountered as a result of an incident and always use universal cleaning precautions.
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1.3 COMPANY RULES

SAFETY RULES

Always be careful – use good judgement in doing your work to protect yourself and others from injury.

Report all near misses, injuries and accidents immediately.

Report to your Supervisor or Safety Representative all unsafe acts or conditions.

Employees will not cause or participate in any form of harassment or violence.

All workers will actively participate in the Hazard Assessment identification and recognition process.

Wear proper personal protective (PPE) equipment as following:

- Employees working must wear CSA approved steel toed boots (with 6” ankle protection) at all times when exposed to foot hazards.
- CSA approved safety glasses, goggles or face shields shall be worn when exposed to eye hazards.
- CSA approved hard hats must be worn when exposed to head hazards and are mandatory on all commercial sites.
- Hearing protection shall be worn when subjected to excessive noise.
- Each employee will ensure that they have work gloves available.
- Clothing shall be appropriate to duties performed. Long pants, shirts with sleeves (no bands or vulgar messaging allowed) and safety vests are minimum requirement.
- Fall protection is mandatory while working at heights as per the regulations, and where required by law.
- Respiratory protection where required.
- Skin protection in the form of Tyvek suits and nitrile gloves when around open chemicals.
- Any other specialized PPE required to perform tasks safely.
- All PPE must be returned when a replacement is requested.

Employees will be provided with specialty PPE that meets the regulatory standards.

Do not operate machines or equipment unless authorized and certified to do so.

Do not operate machinery or equipment where safety guards have been removed.

Do not attempt to repair machinery or remove guards while it is in motion and until it is properly tagged and locked out.

Do not use defective tools or equipment. Report such cases to your supervisor or safety representative.

Maintain good housekeeping practices as following:

- Eliminate clutter which is a common cause of accidents, such as slips, trips, and falls.
- Stack and store items safely and in proper places
- Use proper waste containers.
- Vacuum or wet sweep dusty areas frequently
- Clean up spills and leaks of any type quickly and safely.
- Store all work materials in approved and designated containers.
- Keep floors clean, dry and in good condition.
- Keep exits, aisles, and entrances clear.
- Keep sprinklers, fire alarms and fire extinguishers clear.
- Keep work areas clean.

Use only those ladders, which are in good condition and equipped with safety feet.

Lift and carry things safely. Utilize lifts (certified operators only), or other mobile devices such as carts, tables with wheels or request assistance.

When working above floor level, secure all tools, ladders, equipment, and personnel against falling. Fall arrest or restraint protection must be utilized when working 6 feet or three (3) meters or more above floor level.

Observe and obey warning signs, labels and tags.

Workers must be free from impairment (alcohol, drugs, fatigue) prior to, and during their work shift.

Arriving for and/or remaining at work when unable to perform the work safely or not being “fit for duty” will not be tolerated.

Theft, vandalism, or any other misuse/abuse of company property is prohibited.

Work in compliance with WHMIS regulations, use approved safety containers for all flammable liquids.

Smoking is permitted only in designated areas.

Running is not permitted anywhere, except in the case of extreme emergency.

No fighting, horseplay or practical jokes.

No worker shall carry out work if there exists a danger to oneself and/or others.

Follow all safety requirements of the job site, including the Company’s safety policies, procedures, and Occupational Health and Safety Regulations.

- The information in this manual does not take precedence over OH&S Act, Regulations or Code, or any other government legislation, with which all workers should be familiar.



CEO – Daniel L. Loudon
EIFFEL GROUP OF COMPANIES

1.4 PROGRESSIVE DISCIPLINE POLICY

The management of Eiffel Group of Companies is committed to achieving health and safety excellence by providing an injury and accident-free workplace for its workers. All employees are required to follow applicable legislation, company rules, safe work practices and safe job procedures.

Violations will be handled in an objective but firm manner.

All employee's, including sub-contractors must adhere to the safety regulations. The same disciplinary action guidelines apply to sub-contractors. When a supervisor is made aware of health and safety regulations being neglected on the part of the sub-contractor, it is his / her responsibility to use disciplinary action.

Documentation is required at each stage of enforcement. The steps of the enforcement progression are:

1st offence – verbal warning

The Supervisor will issue a written caution to the individual regarding the unacceptable action, the potential consequences, and have it corrected accordingly. Care will be taken to determine the cause or reason for such unacceptable action. Retraining and/or skill practice may be required. The incident is to be recorded on the Notice of Non-Compliance and a copy provided to the employee and to Management.

2nd offence – written warning

An individual who persists in non-compliance, or who displays disrespect towards any client, supervisor or safety personnel, will be subject to suspension, without pay. Termination may be warranted under the circumstances, depending on the severity of the incident. Suspensions or terminations are to be recorded on the Notice of Non-Compliance and a copy provided to the employee and to Management. If a supervisor has made a decision to terminate the employee, the supervisor should advise his/her manager of this decision prior to implementation.

3rd offence – dismissal

Blatant disregard for documented procedures or practices which seriously jeopardizes the safety of the individual or others will result in the immediate removal of that individual from the workplace and possible termination of employment.

If an employee disagrees with the discipline received or feels that there are extenuating circumstances which contributed to the incident, but which were not taken into consideration by the supervisor, the employee may request that the incident be reviewed by the supervisor's manager. At the manager's discretion, a meeting with the employee may be held.

Note: Understanding that there are some infractions that may require immediate dismissal, the above procedure may not always apply to serious infractions as per company rules and policies. Any measure or combination of measures deemed appropriate to the circumstance can be used.

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CEO – Daniel L. Loudon
EIFFEL GROUP OF COMPANIES

ELEMENT 2

PUBLIC, VISITORS & CONTRACTED EMPLOYERS



2.0 PUBLIC, VISITORS & CONTRACTED EMPLOYERS

The safety of our Team Members, visitors and contractors is extremely important to us! Please observe the following safety rules for your own protection and for the safety of others.

2.1 VISITOR POLICY

The Eiffel Visitor Policy outlines Eiffel's rules for receiving visitors at our premises. Eiffel intends to ensure that visitors will remain safe as well as not pose threats to our premises, property and staff.

“Workplace visitors” may refer to personal visitors (employees’ friends and family), external worksite parties, suppliers, job candidates, other employers and the public.

VISITOR RESPONSIBILITIES

- All visitors to Eiffel Group of Companies office and/or work sites upon arrival must read and sign the **visitor sign in sheet** and **orientation**.
 - Visitors entering EIFFEL GROUP OF COMPANIES work locations must follow the instructions of Management, their designate or personal escort.
 - Personal Protective Equipment must be worn as and when required.
 - Visitors are not allowed to walk about a worksite unescorted. The exception is the head office, kitchen and training room.
 - Visitors must not misuse our Wi-Fi, disclose confidential information or take photographs without permission.
 - Visitors must read and abide by Eiffel Group of Companies Health and Safety policy and participate in FLHA’s as required.
 - After hours visitors must have authorization from management
 - Visitors include delivery personnel, Subcontractor, Suppliers etc...
 - Visitors who fail to follow Eiffel’s Visitor Policy will be asked to leave the premises by a manager or designate.
- The information in this manual does not take precedence over OH&S Act, Regulations or Code, or any other government legislation, with which all workers should be familiar.



CEO – Daniel L. Loudon
EIFFEL GROUP OF COMPANIES

(Signed copies of this Policy Statement are posted)

2.2 CONTRACTOR POLICY

Eiffel is committed to maintaining a workplace in which safety is part of everything we do. It is our policy that all contractors perform all work in accordance with the law, regulations, applicable standards and company rules to the performance of work on any Eiffel, or Eiffel’s customer worksite.

The purpose of this policy is to establish the safety requirements for work performed by all contactors, and to protect the health and safety of contractor, Eiffel employees, and the public. This policy applies to all contactors and sub-contractors working at, or for Eiffel Group of Companies.

Contractors will be monitored for compliance with Eiffel's Health and Safety Program and evaluated post contract to ensure that safety and quality performance standards are assessed for contractors to be chosen for future work.

CONTRACTOR RESPONSIBILITIES

Subcontractors shall ensure that they:

- Maintain full compliance with pre-qualification conditions.
- Provide proof of good standing with the Workers Compensation Board (WCB)
- Plan and execute all work in a manner that complies with the Eiffel Safety Program, contractual and regulatory requirements, Safe Work Practices etc.
- Ensure a copy of the Occupational Health & Safety Regulation, Act and Code is readily available to your employees.
- Provide and enforce the use of adequate PPE. This includes safety glasses/ goggles, safety boots, hearing protection, coveralls etc.
- Be responsible for keeping all work areas clean and free of hazards. Throwing refuse or objects, littering or otherwise contributing to poor housekeeping or unsafe conditions is forbidden.
- Immediately report all accidents and injuries and investigate incidents to the Supervisor or Management.
- Immediately correct any unsafe conditions or practices reported or observed.
- Refuse to perform work when unsafe conditions exist and refuse work that the employee or subcontractor is not competent to perform.
- Have zero tolerance of drugs and alcohol. No work shall be performed under the influence of drugs or alcohol.
- All contractors shall participate in a site orientation based on the scope of work, as required. Records of orientation shall be maintained in accordance with Eiffel's record-keeping protocols.
- Know the location, type and operation of emergency equipment.
- **Complete a Hazard Assessment prior to commencing work on any Eiffel work site. Be sure to include all employees in the process.**
- **Ensure that every tool, appliance, equipment, and piece of machinery is in safe operating condition and complies with provincial and federal legislation.**
- **Abide by and support the safety initiatives and mandates on Eiffel sites at all times including Eiffel Trade & Supplier Agreement.**

Any violations will result in immediate dismissal from the premises or customer site.

- The information in this manual does not take precedence over OH&S Act, Regulations or Code, or any other government legislation, with which all workers should be familiar.



CEO – Daniel L. Louden
EIFFEL GROUP OF COMPANIES

2.3 SUBCONTRACTOR MANAGEMENT PLAN

Eiffel Group Inc. will implement a process to select, evaluate and monitor subcontractors and self-employed persons, that includes at a minimum:

1. Evaluation of potential subcontractors and self-employed persons
2. Selection process for subcontractors and self-employed persons
3. Monitoring of subcontractors and self-employed persons
4. Addressing Non-Compliance

Selection process for subcontractors and self-employed persons:

Eiffel will confirm subcontractors have valid Workers Compensation coverage. Contractors must ensure they obtain proof of Workers Compensation coverage from their subcontractors.

Subcontractors who are not required to have Workers Compensation coverage must obtain approval from the company before they are allowed to enter the work site.

Written Health, Safety, and Environmental programs and training documentation applicable to the type of work the subcontractor will perform, will be obtained and reviewed to assist with the hiring of safe subcontractors. If subcontractor does not have a Health and Safety Manual, that subcontractor must have a safety orientation by Eiffel prior to being eligible to be hired on to work on company's projects.

Evaluation of potential subcontractors and self-employed persons

Past performance is a key indicator of future performance. HSE statistics should be obtained and analyzed to ensure that only safe subcontractors are hired.

The company will obtain a copy of the subcontractor's workers compensation premium rate statement and compare their performance to others in their industry. Those who outperform the industry should be selected whenever practicable.

Post job performance reviews should be conducted for subcontractors. A combination of factors may be considered including, but not limited to, housekeeping, cost, active participation in safety meetings, and quality of work.

Communication and Monitoring of subcontractors and self-employed persons

Subcontractors, self-employed persons and/or visitors, must be provided a site orientation that addresses health, safety, security, and/or environmental concerns, prior to starting work on that jobsite.

The company will communicate our Health and Safety Policy and Drug and Alcohol policy to subcontractors and self-employed persons and provide them with the copy of the company safety handbook.

Subcontractors will be included in pre-job meetings and hazard assessments. Pre-job meetings can include information taken from a hazard assessment and any other safety or operational concerns.

Eiffel will ensure that subcontractors are aware of incident reporting requirements. Subcontractors must report all incidents to our company. If a subcontractor is involved in an incident, our company is responsible for reporting the incident to the hiring client. Eiffel must ensure the incident is investigated, and all involved employees or subcontractors must participate in the investigation.

Eiffel will communicate following to all contractors, and visitors:

- a) Work site hazards and controls
- b) contractors, and visitor's safety responsibilities while on work site
- c) changes to the work site (hazards or conditions)

Non-Compliance

All subcontractors and self-employed persons are expected to comply health and safety policies found in this safety manual and conform to all applicable safety laws. Any nonconformance will be handled in firm and objective manner.

Disciplinary actions will follow a progression of warnings: Verbal, Written, Dismissal.

Any subcontractors found in non-compliance with company safety policies, or any safety laws, will not be eligible to perform work on company jobsites.

ELEMENT 3

HEALTH & SAFETY

COMMITTEES/ HS REPRESENTATIVES



3.0 HEALTH & SAFETY COMMITTEE/HS REPRESENTATIVES

Eiffel Group of Companies recognizes the valuable contributions made by the JHSC and workplace health and safety representatives towards maintaining safe and healthy workplaces. Committees and representatives play an integral part in the company’s inspection program, hazard identification and controls, development of safe work practices and procedures, as well as identifying training and educational needs, and promoting safety awareness programs.

The committee and its representative’s direct involvement with the day-to-day operations of their workplace places them in a better position to recognize essential problems and make practical recommendations.

1. The committee shall be known as the:

Eiffel Joint Health and Safety Committee.
 322163 15th St East
 Okotoks, AB
 T1S 1A3

2. Purpose

The purpose of the Joint Work Site Health and Safety Committee is to identify and resolve safety concerns as well as promote health and safety at the work site.

The committee also aids in increasing two-way communication between workers and employers as well as promoting a healthy and safe working environment.

3. Committee Membership

- (a) The committee shall consist of at least 4 members.
- (b) The committee must consist of worker representatives and employer representatives
- (c) At least half of the members must be worker representatives.
- (d) The worker representatives must be selected by the workers from workers at the workplace who do not exercise managerial functions at the workplace according to the procedures identified in section 128 of the Workers’ Compensation (WC) Act.

Representative	Company	Contact Info
Worker Rep: TBD		
Worker Rep:		
Worker Rep:		
Employer Rep:		
Employer Rep:		
Employer Rep: TBD		
Administrator: Cody Thompsom	YGC-MAX	403-700-2639 Cody@eiffelgroupcanada.ca

4. Duties and functions

The duties and functions of the committee are identified in the OHS Act, s.19, and include the items below.

- a) The receipt, consideration and disposition of concerns and complaints respecting the health and safety of workers.
- b) Participation in the identification of hazards to workers or other persons arising out of or in connection with activities at the work site.
- c) Develop, monitor, and follow-up on corrective actions.
- d) The development and promotion of measures to protect the health and safety of persons at the work site and checking the effectiveness of such measures.
- e) Cooperation with an officer exercising their duties under the OHS act, the regulations and the OHS code.
- f) The development and promotion of programs for education and information concerning health and safety.
- g) The making of recommendations to the employer, prime contractor or owner respecting the health and safety of workers.
- h) The inspection of the work site at regular intervals
- i) The participation in investigations of serious injuries and incidents at the work site in accordance with section 40
- j) The maintenance of records in connection with the receipt and disposition of concerns and complaints and the attendance to other matters relating to the duties of the committee.
- k) Other duties as may be specified in this act, the regulations and the OHS code.

Duties shall be performed during normal working hours.

5. Records

The committee will keep accurate records of all activities conducted by and all items addressed by the committee.

Records include meeting agendas, meeting minutes, recommendations to the employer, inspections, hazard reports, incident reports, investigations, action plans, orders, interactions with OHS officers, or any other documentation related to the duties and functions of the committee.

6. Inspections

The committee will inspect the work site at least once before each quarterly meeting to identify health and safety hazards that have not been controlled.

Additional inspections will be conducted as per work site or employer policies.

7. Meetings

The committee shall meet in accordance with OHS Act, s.22. The requirements are stated below.

- a) Meet within 10 days of being established.
- b) Meet at least quarterly.
- c) Meet if requested by a co-chair.
- d) Meet if requested by an OHS officer.

Meetings shall be held during normal working hours. A quorum is required to hold a meeting.

8. Agenda and meeting minutes

Meeting agendas and minutes will adhere to the guidelines below.

- a) Meeting agendas and minutes will follow the approved templates.
- b) An agenda will be prepared by the co-chairs and distributed to members prior to the meeting.
- c) The co-chairs must ensure that meeting minutes are recorded.
- d) The co-chairs must ensure that meeting minutes are approved and given to the employer within 7 days of the meeting.
- e) The co-chairs must ensure copies of the approved meeting minutes are posted or provided by electronic means at the work site within 7 days after the day the meeting was held.

9. Composition

The committee's composition will follow the requirements below.

- a) The committee shall consist of a minimum of 4 members.
- b) One worker representative will be elected from each of the following groups: YCH/YGC and Max
- c) One employer representative will be appointed elected from each of the following groups: YCH/YGC and Max

Co-Chairs

Two co-chairs will be selected by the members of the committee.

- a) The worker representative shall select one co-chair.
- b) The employer representatives shall select one co-chair.

The co-chairs have specific requirements under the AB OHS Act (s.22, s.25, s.27). Co-Chair responsibilities are listed below.

- a) Alternate in serving as chair at committee meetings.
- b) Participate in all decisions of the committee.
- c) Prepare the agendas for the committee meetings.
- d) Ensure that meeting minutes are recorded.
- e) Ensure that meeting minutes are approved and given to the employer within 7 days of the meeting.
- f) Ensure copies of the approved meeting minutes are posted or provided by electronic means at the work site within 7 days after the day the meeting was held.

Either co-chair may call a special meeting.

10. Quorum

The composition of the quorum shall follow the requirements below.

- a) Consist of 2 members (one-half of the members)
- b) Both worker and employer members must be present
- c) At least one half of members present are workers.

A quorum is required to conduct a meeting or make valid recommendations and decisions.

11. Terms of Office

The AB OHS Act, s.24 states the duration of a members' term on the JWSHSC. The durations in the OHS Act are specified below.

- a) Normally not less than one year
- b) May be longer than one year until a successor is selected or appointed.

12. Replacing a member

If a member must step down during the member's term of office, the following procedure will be followed to replace the member.

- a) The member will advise the committee in writing of their intent to step down.
- b) The committee will pass the motion to replace the member, if necessary
- c) The committee will inform the employer if the member is an employer member, or the committee will proceed with an appropriate election process to elect a new worker member.
- d) If the member stepping down is a co-chair, the committee must proceed with a co-chair selection once the new member joins the committee.

13. Recommendations to the employer

Recommendations to the employer will follow the requirements stated below.

- a) Written using the approved template.
- b) Directly related to health and safety
- c) Reasonably capable of being done.
- d) Clear and complete (ensure the employer will not need more information to make a decision)

14. Resolution of disagreements

With the Employer

As per s.21 of the OHS Act, when a matter cannot be resolved after written reasons are given by the employer, the employer, the JWSHSC, or a member of the JWSHSC may refer the concern to an OHS officer.

Amongst the JWSHSC

When the committee is unable to reach an agreement regarding a health and safety matter the committee will a co-chair of the committee may report this to a senior Manager, who may investigate and attempt to resolve the matter.

15. Coordination with other JWSHSCs

If there are other JWSHSC established by the same employer or prime contractor, if there is one, the committee will coordinate accordingly. Coordination includes such items below.

- a) Appointing individuals (JWSHSC coordinators) to share information amongst the established JWSHSCs.

Example:

JWSHSC	Coordinator
JWSHSC #1	
JWSHSC #2	

JWSHSC #3	
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- b) Communication of relevant safety information such as inspection reports, incident reports, corrective action recommendations, and other recommendations made to the employer.
- c) Meeting locations, dates, and times will be shared to allow for coordinators to attend the other committees' meetings.

16. Disclosure of Information

The committee or its individual members, must not disclose a worker's personal health information or the personal information of an identifiable individual unless the disclosure is required by law.

17. Training Requirements

An employer must ensure that each HSC co-chair completes a one-time mandatory HSC/HS representative training course. The mandatory course is six to eight hours long and counts towards the 16 hour/two shift annual training allowance in the legislation. HSC co-chairs or HS representatives may use the remainder of their 16 hour/two shift annual training allowance for additional OHS training.

- Additional training may include general health and safety training, or hazard or industry-specific OHS training that would assist in fulfilling duties and responsibilities outlined in the legislation.

18. Amendments

These rules of procedure may be amended by vote of the committee members.

19. Status of Rules of Procedure

These terms of reference and rules of procedure should be reviewed annually and will remain in force and in effect until new terms of reference are entered into.

These terms of reference and rules of procedure were drafted/last amended on Jan 6, 2025 and approved by:

TBD

Jan 6, 2025

Worker Co-Chair

Date

TBD

Employer Co-Chair

Date

ELEMENT 4 TRAINING & COMMUNICATION



4.0 TRAINING & COMMUNICATION POLICY

Eiffel Group of Companies recognizes that ongoing training and communication are a vital part of the company's Safety Program.

The purpose of training and effective communication is to:

- Establish an effective communications link between all levels of employees at Eiffel.
- Diffuse potential job disruptions by providing a forum for discussion of critical safety issues.
- Exchange information regarding specific safety matters.
- Grow our safety culture and reinforce commitment to the Health and Safety of our team, and
- Obtain a "Loss Free" workplace through education.

It is the responsibility of every employee to communicate information about Eiffel's Safety Management System to peers, contractors, our clients, and any other individual with whom we do business. The Company believes that sharing information is an input that leads to safe human behavior.

Training employees' aids in the development and maintenance of job-specific skills required to work safely and efficiently. Every employee level will benefit from increased learning and support in the workplace. All individuals must participate in creating a safe working environment.

No person shall perform any job or task that is beyond their ability to safely do so.

Eiffel will keep up to date records of each safety meeting identifying the health and safety instruction or training received, and the date the meeting took place. Each Supervisor must ensure that all workers under their direction have been suitably trained to company and provincial safety standards.

At minimum, all employees will receive, and participate fully, in:

- Safety Orientations for all employees
- Staff Introductions
- Facility Tour
- On-the Job Training
- Tailgate Meetings
- General Company Safety Meetings
- Job specific training or Specialized Training (eg. HS for the Asbestos Worker)
- Competency assessments.

SAFETY ORIENTATION

All Employees including new, transferred and promoted workers shall receive a health & safety orientation prior to the commencement of their work. Contractors will be required to take part in a site-specific safety orientation covering the Hazard Assessment and the Emergency Preparedness Plan prepared by the Supervisor of the site.

All new employees are required to attend the company new-hire safety orientation and must complete a checklist confirming attendance and their understanding of the policies.

STAFF INTRODUCTIONS

Staff introduction will be conducted by the new employees direct Supervisor.

A general introduction by way of email will also be sent to all personnel introducing the new hire and will include all required contact information.

FACILITY TOUR

A tour of the facility will be conducted by the company Health & Safety Manager or Site Supervisor.

The tour will include familiarizing the new hire with the location of emergency exits, first aid stations, fire extinguisher locations, eye wash locations as well as material and equipment locations.

The tour will include a tutorial of the company's general rules and housekeeping requirements.

ON-THE-JOB TRAINING

Shadowing is the first step of the new hire training. The new employee will be paired with an experienced employee that is either of greater or equal position, familiar with the tasks required of the new hire specifically.

During the shadowing the new hire will learn through observation and practical demonstration/hands on work related to their job description.

The time necessary for shadowing is not specific. This is determined by the pre-existing experience of the new hire, the specific requirements for the position as well as the complexity of the position. The Supervisor will ultimately determine the competency or "ready for work" date based on his or her time spent with the new hire.

During the on-the-job training process, employees will be given specific safety training as it pertains to the work site or task. This training is to be recorded in the Employee Training Record.

Work site training will include as applicable:

- Customer's policies and procedures.
- Safety and health hazards of the job.
- Safe Work Practices, procedures and precautions
- Where applicable, the use, care and maintenance of personal protective equipment.
- If hazardous materials are present or used, provide training in the content, purpose and significance of the supplier and workplace labels, and of safety data sheets (SDS's).
- Where applicable, procedures for the safe handling, disposal, use and storage of product in use at the site.
- Emergency Preparedness and Response.

TAILGATE SAFETY MEETINGS

Tailgate meetings shall be held bi-weekly or whenever there is a significant change in job site hazards.

The purpose of the bi-weekly tailgate meetings is to inform all personnel of the jobs being conducted throughout the site, the hazards they present and safe work procedures to be used. Supervisors should discuss the results of the weekly job site inspection and hazard assessment.

These meetings also present an open forum for everyone to address any safety concerns they may have as well as comment on current safe work procedures and offer suggestions for improvements.

These meetings should be approximately 10-15 minutes in length and are intended to be informal.

Notes of each meeting will be kept and recorded on the FLHA and follow-up ideas and improvements will be monitored.

Tailgate meetings will be held for office staff four times per year.

GENERAL COMPANY SAFETY MEETINGS

At least quarterly. These meetings will include two-way communication and feedback on health and safety issues including incidents, inspections and hazards encountered in the workplace. Records of each meeting will be kept, and follow-up ideas and improvements will be monitored.

JOB SPECIFIC TRAINING

No employee will be permitted to perform a job task for which he/she is not properly qualified, experienced or trained. Job Specific Training will be provided to assure a competent employee with a solid background of safe work habits on which to build their experience. It will occur upon first hiring, assignment of new tasks or when relevant operational changes take place. The Supervisor, who instructs employees in safe work practices and monitors their performance, normally conducts Job Specific Training.

The following general safety training will be provided for employees:

- Safe Work Practices and Procedures (All employees)
 - WHMIS 2015 (Workplace Hazardous Materials Information System) (Field/Yard/Shop employees)
 - General and Site-Specific Employee Safety Orientation (All employees) including task specific hazards and controls.
 - First Aid (selected employees as per OH&S Guidelines)
 - ACSA Leadership for Safety Excellence (HSA and/or selected employees)
 - Auditor Training (HSA)
 - Hazard management (HSA and/or selected employees)
 - Others as recommended by Safety Manager or Project Managers and approved by the CEO.
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COMPETENCY ASSESSMENTS

Competency assessments are used to ensure employees have and use the appropriate knowledge and skills in on-job situations.

Competency assessments will be performed as follows:

- All field staff must be certified in WHMIS 2015 and maintain certification (re-certification will occur every three years).
- Staff who are required to do Asbestos Remediation or Trauma Scene Clean-up will have and maintain certification from an organization that meets or exceeds Occupational Health and Safety Guidelines (re-certification will occur every three years).
- Staff who require First Aid as per Eiffel policy will acquire and maintain certification (re-certification will occur every three years).
- Evacuation drills and fire extinguisher training will take place annually.

The specified set intervals for competency assessment are minimums and may take place more frequently when required according to operational changes.

DISTRIBUTION OF INFORMATION

Information related to the Health and Safety Program will be distributed via one or more of the following:

- Email
- Staff Group text
- Safety bulletin board
- Safety meetings

Employees are required to monitor these forums and are expected to be aware of all information being distributed.

ELEMENT 5 HAZARD ASSESSMENT



5.0 HAZARD ASSESSMENTS

To maintain a safe work environment, we must be constantly aware of any actual or potential hazards, which may cause impaired health, injury, or damage to property or the environment. It is the goal of the company that all hazards are identified, and necessary action is followed through to eliminate each hazard as it is identified. All hazards must be documented on Job Hazard Assessment Forms and control measures put in place before commencement of work.

One of the key things that can be done to provide a safe workplace for all workers, visitors and the public is to eliminate or control hazards before they turn into incidents. To do that first identify hazards, report them, assess them and then finally correct them and follow-up to ensure the controls remain effective. This policy applies to all managers, supervisors, and workers, including contracted personnel performing work for the Company.

Compliance with this policy and *Alberta OHS Code Part 2 – Hazard Assessment, Elimination, and Control* is mandatory.

This will be achieved through the use of formal hazard assessments and site-specific hazard assessments.

FORMAL HAZARD ASSESSMENTS

- Will be used to assess *all* positions in the Company.
- Will be conducted by trained personnel (including managers, supervisors and a selection of workers who perform the tasks)
- Reviewed at least every 3 years.
- Will be conducted.
 - a) In the event of process or operational change (including change in equipment, material/product use or construction)
 - b) As need is identified in an inspection or incident investigation
 - c) As need is identified in a site-specific hazard assessment

SITE-SPECIFIC HAZARD ASSESSMENTS

- Will be performed for all work sites, offices, yards and shops.
- Will be conducted by affected, trained workers with involvement from the Site Supervisor.
- Will be signed off by all staff acknowledging they have read, understood and will comply with it.
- Will be conducted
 - a) At the beginning of shift (i.e., daily basis) and re-assessed if conditions change (including the addition of new workers)
 - b) Before non-routine tasks are performed

RESPONSIBILITIES

- Managers must ensure workers are trained on the hazard assessment process and policy.
- Supervisors must ensure workers are adhering to the hazard assessment process and policy.
- Workers (including contracted personnel) must adhere to the hazard assessment process and policy.

5.1 HAZARD IDENTIFICATION AND ASSESSMENT

Hazard assessment is a thorough, ongoing examination of the workplace for the purposes of identifying what and where actual and potential hazards exist.

Hazard assessment is important as it creates awareness of hazards and risks. It identifies who may be at risk, i.e. (employees, trades, visitors, subcontractors or the public, etc.).

At Eiffel Group of Companies, a thorough hazard assessment inventory of jobs or tasks shall be carried out by competent individuals. Based on the risks identified, a Critical Task Inventory List shall be developed, and mitigation plans implemented in a timely manner to prevent injuries to workers, property, environmental and the public.

In order for workers to be safe, they must know what is not safe. EIFFEL GROUP OF COMPANIES must take the time to correctly analyze employees, the situation, environment, etc. Being able to accurately identify hazards in the workplace will allow EIFFEL GROUP OF COMPANIES to eliminate or control them and ensure safety.

A hazard is any condition or act which may injure or harm a worker, the environment, or physical property. Some types of hazards which you will face as a worker may include:

- **Physical** (hand tools, vibration, sharp objects, etc.)
- **Psychological** (stress, fatigue)
- **Chemical** (gases, fumes, sprays, etc.)
- **Biological** (bacteria, fungi, viruses, etc.)

Once the hazards have been identified, they are then prioritized by potential and risk to ensure that critical hazards are controlled immediately, and low risk or low potential hazards are controlled after the critical hazards have been effectively dealt with.

Workplace hazards typically are generated by, or exist in:

- **The people** (workers, visitors, contractors, vendors, etc.).
- **The environment** (indoors, noise, material handling, floor hazards, etc.).
- **The materials** to be worked with.
- **The tools** to be used.

A hazard assessment and analysis worksheet should use the simplest methods that adequately characterize the probability and severity of incidents.



1. Identification of the hazards.
2. Modeling of the incident scenarios.
3. Estimation of the consequences.
4. Estimation of the likelihood of hazards.
5. Quantification of the risk using a hazard matrix.
6. Judging the acceptability of the risks.
7. Development of strategies for prevention and “controlling” risks.

Hazard assessments have been conducted on a variety of tasks and are available to all employees who are required to be trained on the hazard assessment.

In the event that the employee is offsite the work order will document the hazard assessment was completed and risks identified.

5.2 HAZARD REPORTING

All hazards in the office/shop, jobsite and yard must be reported to your immediate supervisor and/or designate. In the event of an incident, it must be recorded by means of “Incident Investigation Report”. It is the responsibility of all employees to report hazards.

The following are methods in which worker can use to report hazard: Employees are encouraged to use a method that documents the hazard however they may use any method they feel comfortable with.

1. Reporting the hazard to your manager or supervisor.
2. Using the Incident Investigation Report form to report the hazard.
3. Bringing the hazard up during a safety meeting.
4. Bring the hazard up during an inspection or audit.

Without proper correction and follow-up on hazards, all the time and energy put into identifying, reporting and investigating them is wasted. Each formal method of hazard identification and follow-up ensures the hazard is addressed. Hazards communicated verbally, like any other identified hazard, it is the responsibility of management to ensure they are properly addressed and documented.

5.3 CRITICAL TASKS

Critical Task is a task that when identified or if the procedures are incorrectly performed or absent, has a significant potential for loss to people, product, process or profit.

Job Hazard Analysis or Risk Assessment shall be conducted for every task performed by Eiffel employees in order to develop a Critical Task Inventory List.

All critical tasks shall be subject to a regular review to prevent the development of conditions that may put workers at risk. These reviews shall take place on annual basis at a minimum, or any time a new process is introduced, a change is made to the operation, or a significant addition or alteration is made.

Critical tasks shall be categorized based on these factors:

- Upon completion of a JHA, where the “Risk Rating” is high, these tasks shall be classified as “Critical Tasks”. **Risk rating shall be calculated based on the frequency, the severity, and the probability of the tasks being performed.**

A Critical Task is one that may include the following factors:

- Jobs with high frequency of accidents or near misses which pose a significant threat to health and safety.
- Jobs that have the potential to produce fatalities, disabling injuries, illnesses or environmental harm.
- Newly established jobs whose hazards may not be evident because of lack of experience.
- Jobs that are to be performed in hazardous and/or unfamiliar environments i.e., confined spaces, restricted access, excavations, heavy equipment, elevated work surfaces, unfamiliar work site.
- If an incident / injury has occurred in the past while performing the task, it should automatically be considered a critical task.
- Where the OH&S Regulations require a detailed procedure, that task is a critical task.

The following is a list of critical tasks performed by EIFFEL GROUP OF COMPANIES

Construction	Restoration
1. Working at Heights - Fall Protection	1. Asbestos Abatement
2. Demolition	2. Silica
3. Excavating & Trenching	3. Biohazard Remediation
4. Harassment & Violence	4. Harassment & Violence
5. Driving	5. Demolition

ELEMENT 6

HAZARD CONTROL



6.0 HAZARD CONTROL METHODS

When hazards have been identified, assessed, and prioritized, strategies need to be developed to control them. Every SWP and SJP has been developed specifically to prevent the occurrence of incidents associated with the hazards identified through this process.

When it comes to controlling a hazard there are a variety of methods to use. The most effective system of control is the application of a combination of the four control methods:

- Elimination
- Engineering
- Administration
- PPE

Elimination

Whenever possible, the preference is to eliminate the hazard. If there is a sharp edge on the handle of a tool being used, file down the sharp edge or use another technique to eliminate it. Often elimination of hazards is done in the planning phase.

Engineering

If the sharp edge cannot be eliminated, substitute the tool for another that is free from hazards. To prevent this from occurring again, look at a design change or implement engineering controls to ensure that sharp edges are not created in the manufacturer specifications. Engineering controls are also effective in regard to barriers, guards, noise shields, etc.

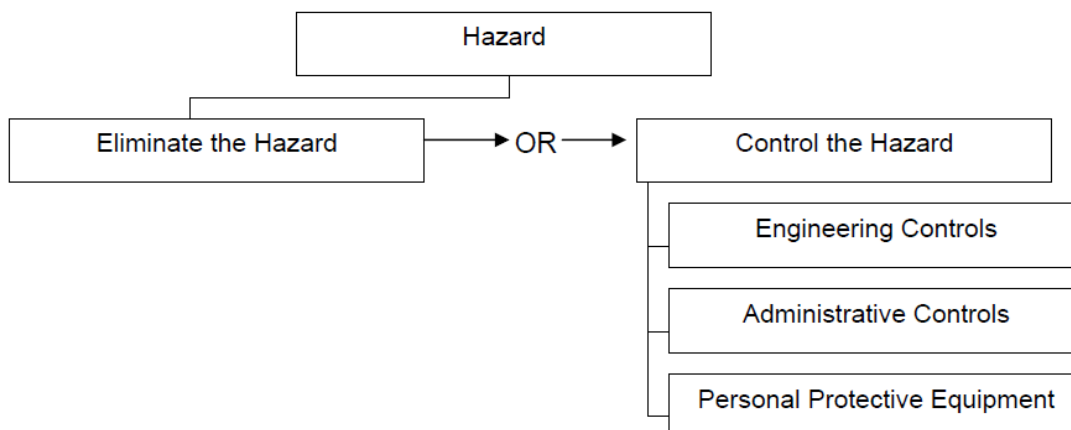
Administration

Administrative controls may be implemented in the form of increased training for use of this sharp-edged tool, or ensuring workers are maintaining equipment correctly. Administration is almost always a method of control in place.

PPE

This method of hazard control is least preferred because personal protective devices may reduce a worker's productivity, while affording less effective protection against the recognized hazard than other methods of control. PPE has limitations and placing it on a worker doesn't eliminate the hazard, but only shields them from some risk. Nevertheless, there are instances where adequate levels of risk reduction cannot be achieved through other methods, and personal protective devices must be used, either alone or in conjunction with other protective measures. Personal protective equipment (PPE) should be used by employees in those situations where engineering controls and administrative controls have not controlled the hazard to an acceptable risk.

HIERARCHY OF CONTROLS: Where possible, hazards should be controlled in order as listed above.



Training to Recognize and Identify Hazards

Training to recognize and identify hazards will consist of a combination of the following:

- Participating in EIFFEL GROUP OF COMPANIES Safety Orientation Processes.
- Reading and discussing the hazard assessment section of the safety manual.
- Participating in pre-job hazard assessment activities.
- Participating in pre-job safety meetings and monthly safety meetings.
- Discussing incidents that occurred within the company and within the industry.
- Working with experienced employees, contractors, clients and suppliers.

Monitoring and Evaluating Effectiveness of the Controls Implemented

It is important to know that your hazard assessment was complete, accurate and if the controls selected and implemented are effective.

It is also essential to be sure those changes in the workplace have not introduced new hazards or changed hazards that were once designated as a lower priority to a high priority.

Identified, assessed and controlled hazards must be monitored from time to time. These monitoring could include observations during monthly workplace inspections, daily informal inspections by the supervisors or lead hands, and communicating with the employees affected by the changes implemented.

It is a good practice to review your assessment on a regular basis to be sure that nothing has changed and that your control methods are effective.

A new revision may be required when:

- When a new work process is introduced,
 - When a job or task is seldom performed,
 - When a work process or operation changes, or
 - Before the construction of a new work site.
-

6.1 SAFE WORK PRACTICES

EIFFEL GROUP OF COMPANIES is committed to the development, maintenance and implementation of written Safe Work Practices that provide clear guidelines for safely performing a task. Due to the diversity of circumstances and situations within Eiffel Group of Companies the information contained in Safe Work Practices cannot be considered complete or applicable in every situation.

Supervisors and workers 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.

General

Safe Work Practices (SWP's) are administrative controls that have been developed to assist employees in carrying out the work activities. Potential hazards have been identified for typical activities and work sites through Hazard Assessment and Analysis Worksheets, and SWP's have been developed to minimize these hazards.

Safe Work Practices should not be used as substitutes for employee job training. Rather they should serve as a review for performing the tasks safely. These reviews should be conducted during Tailgate meetings, monthly safety meetings, and annual refresher training.

Development, Review and Approval

Eiffel Group of Companies will have specific Safe Work Practices developed for their operations. Workers, Supervisors and Management of Eiffel Group of Companies. will be involved in the development and/or review of these Safe Work Practices. All Safe Work Practices will be developed using the standard Eiffel Group of Companies Safe Work Practice format and are based on a task hazard assessment.

Safe Work Practices will be annually reviewed or whenever an incident occurs to ensure that they are complete, accurate and applicable. Suggestions for additional Safe Work Practices or changes to the existing Safe Work Practices will involve Workers, Supervisors and Management.

The Manager and Safety Officer will approve all Safe Work Practices for Eiffel Group of Companies.

Availability

Safe Work Practices applicable to the work being performed will be available to all workers at the work site. Applicable Safe Work Practices should be reviewed at Safety Tailgate Meetings before the start of work. Safe Work Practices can be used in job-specific training to instruct workers in their job duties and to verify employee competency and understanding.

RESPONSIBILITIES

Supervisors

- Ensure all tasks performed have a current Safe Work Practice developed and, where required, a Safe Job Procedure.
- Ensure employees are initially trained for the proper operation.
- Ensure documentation is kept current.
- Ensure retraining is completed as necessary.

Employees

- Read, understand and follow all applicable Safe Work Practices.
 - Ask questions if not understood.
 - Attend required training sessions.
-

6.2 SAFE JOB PROCEDURES

EIFFEL GROUP OF COMPANIES is committed to development, maintenance, and implementation of written Safe Job Procedures that provide a written step by step description for how to perform a task from start to finish, in the safest manner.

Safe Job Procedures will be readily accessible to employees. Safe Job Procedures will provide the regulatory, training, and PPE requirements and responsibilities for each person involved in the job. These Safe Job Procedures apply to all employees and contractors performing the specific job.

Note: The criteria for determining whether a Safe Job Procedure is required is when a job or task is deemed critical from a safety perspective and/or needs to be done in a safe, efficient and consistent manner.

General

Safe Job Procedures (SJP's) are administrative controls that have been developed to assist employees in carrying out the job activities. Potential hazards have been identified for job activities and work sites through Hazard Assessment and Analysis Worksheets, and SJP's have been developed to minimize these hazards. The Hazard Assessment and Analysis Worksheet are used to carry out the assessment and prioritize the hazards. Reviews of Safe Job Procedures should be conducted during Tailgate meetings, monthly safety meetings and annual refresher training.

Development

Eiffel Group of Companies will have specific Safe Job Procedures developed for their operations. Procedures should be developed for high-hazard work or where historical information, legislation, a Hazard Assessment or customer requirements dictate. Workers, Supervisors and Management of Eiffel Group of Companies will be involved in the development and/or review of these Safe Job Procedures. All Safe Job Procedures will be developed using the standard Eiffel Group of Companies Safe Work Procedure format and are based on a task hazard assessment.

RESPONSIBILITIES

Supervisors

- Ensure all jobs performed and/or deemed critical have current Safe Job Procedures.
- Ensure employees are initially trained for the proper procedures.
- Ensure documentation is kept current.
- Ensure retraining is completed as necessary.

Employees

- Read, understand and follow all applicable Safe Job Procedures.
- Ask questions if not understood.
- Attend training sessions.

SAFE JOB PROCEDURE ANNUAL REVIEW

Whenever an incident occurs, the practice relating to the task should be thoroughly reviewed by the workers and supervisor to ensure the procedure meets the requirements of the task and current legislation. An annual review should be conducted to ensure safe job procedures reflect current operating practices and should be recorded in the Monthly Health and Safety Meeting Minutes.

TRAINING ON SAFE JOB PROCEDURES

Each employee must be trained in an overview of the processes and Safe Job Procedures. The training is to include emphasis on the specific safety and health hazards, emergency operations including shutdown, and Safe Job Procedures applicable to the employee's job tasks. The training will be recorded on the appropriate employee training record.

6.3 HARASSMENT & VIOLENCE POLICY

Eiffel Group of Companies is committed to providing a work environment in which all workers are treated with respect and dignity. Harassment and violence will not be tolerated from any person at or outside of the work site including customers, clients, other employers, supervisors, workers and members of the public.

Eiffel Group of Companies as the employer is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of harassment and violence. We will take whatever steps are reasonable to protect our workers from the potential hazards associated with workplace violence and harassment.

Bullying and harassment excludes any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment.

Employees must:

- not engage in the bullying and harassment of other employees, in person or on social media/email.
- report if bullying and harassment is observed or experienced; and
- comply with Eiffel's policies and procedures on bullying and harassment.

This policy applies to all Eiffel employees, including permanent, temporary or casual employees, as well as independent contractors. This policy applies wherever Eiffel's business or work-related activities are conducted (including washrooms, lunchrooms, or company vehicles), and includes work-related social functions, conferences and training, and work assignments outside of Eiffel's premises. This policy also applies to conduct by employees outside of the workplace when one or more of Eiffel's employees are the target of bullying and harassment (i.e., cyber-bullying).

There is a Workplace Violence, Bullying & Harassment Program that implements this policy. It includes measures and procedures to protect workers from workplace violence, a means of summoning immediate assistance and a process for workers to report incidents, or raise concerns, and information about how incidents and complaints will be investigated and/or dealt with. Eiffel will ensure this policy and the supporting program are implemented and maintained and that all workers and supervisors have the appropriate information and instruction to protect them from violence and harassment in the workplace.

Every worker must work in compliance with this policy and the supporting procedure. Any employee or independent contractor who engages in workplace harassment or violent conduct may be subject to criminal prosecution and shall be subject to discipline, up to and including termination of employment or contract.

The Company's Workplace Violence and Harassment Policy will be reviewed every year.

- The information in this manual does not take precedence over OH&S Act, Regulations or Code, or any other government legislation, with which all workers should be familiar.



CEO – Daniel L. Loudon
EIFFEL GROUP OF COMPANIES

(Signed copies of this Policy Statement are posted)

6.4 WORKPLACE VIOLENCE, BULLYING & HARASSMENT PROGRAM

PURPOSE

Eiffel Group of Companies is committed to a work environment that is free of violence, bullying and harassment, and one in which all individuals are treated with respect and dignity. This Workplace Violence, Bullying and Harassment Program has been established to provide a clear statement on

- the definition of workplace violence, and what does and what does not constitute bullying and harassment.
- roles and responsibilities of Eiffel's supervisors and employees in addressing and preventing workplace violence, bullying and harassment,
- the process for reporting violence, bullying and harassment; and
- the process for responding to and investigating reports of violence, bullying and harassment.

DEFINITIONS

WORKPLACE VIOLENCE

Workplace violence is defined as:

- the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker.
- an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to a worker.
- a statement or behavior that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

BULLYING AND HARASSMENT

Bullying and harassment is defined as including but not limited to:

Any inappropriate conduct, comment, display, action or gesture by a person that:

- 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; or
- adversely affects the worker's psychological or physical well-being and that the person knows or ought reasonably to know would cause a worker to be humiliated or intimidated (sometimes referred to as personal harassment); and constitutes a threat to the health or safety of the worker.

*excludes any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment.

Examples of bullying and harassment include, but are not limited to:

- verbal aggression (including yelling and insults)
- personal attacks, name calling.
- harmful hazing or initiation practices
- vandalizing personal belongings
- spreading malicious rumors
- other intimidating or humiliating behavior

Workplace bullying and harassment usually consists of repeated incidents or a pattern of behavior that is intended to intimidate, offend, belittle or humiliate a particular person or group of people. Lack of intent is not an excuse if the bully ought to have known the behavior would cause the victim to be humiliated or intimidated. Bullying and harassment can also consist of a single traumatic incident.

Workplace bullying and harassment does not include the exercise of management rights to assign additional work, to hold employees accountable for their performance through performance improvement or corrective action plans and impose justifiable discipline. Also, not every instance of workplace conflict or differences of opinion is bullying and harassment.

SEXUAL HARASSMENT

Workplace harassment also includes sexual harassment. Sexual harassment is defined to mean any "unwelcome conduct of a sexual nature that detrimentally affects the work environment or leads to adverse job-related consequences for the victims of the harassment. By requiring an employee, male or female, to contend with unwelcome sexual actions or explicit sexual demands, sexual harassment in the workplace attacks the dignity and self-respect of the victim both as an employee and as a human being."

COMPLAINANT

The Complainant is the individual making a complaint of violence, bullying and/or harassment against another individual who the Complainant believes has engaged in, or is currently engaging in, violent, and/or bullying and harassing behaviors against the Complainant.

RESPONDENT

The Respondent is the individual that the Complainant has made a complaint against.

WORKPLACE VIOLENCE RISK ASSESSMENTS

Eiffel employees perform a number of activities that may increase the risk of workplace violence.

These include:

- Use of a vehicle (mobile workplace)
- Working alone or with just a few people
- Working late at night or early in the morning
- Working in remote or unknown areas
-

Eiffel proactively assesses the risk of workplace violence in all workplace environments and will re-assess as often as necessary to protect employees from workplace violence. Assessments for workplaces include the nature of the workplace, the type of work or the conditions of work.

PROCEDURES TO CONTROL RISKS OF WORKPLACE VIOLENCE

Your workplace may include a land-line telephone, portable cell phone or other mobile device that is used to communicate. You must be familiar with the communications system available and ensure that you know the number to call for emergency assistance.

WHEN A VIOLENT SITUATION OCCURS OR IS IMMINENT

- Call 911 for emergency situations. Police or emergency responders will assist immediately.
- Call your immediate manager or supervisor if feasible after calling 911.
- If you are at risk, remain calm, try to withdraw from the violent individual and seek an immediate safe location.

Any violent actions committed by Eiffel employees, employees of the client, or members of the public will be prosecuted under the Criminal Code of Canada or as appropriate. Eiffel intends to use reasonable legal, managerial, administrative, and disciplinary procedures to secure the workplace from violence and to reasonably protect employees and members of the public.

VIOLENCE, BULLYING AND HARASSMENT REPORTING PROCEDURE

If you believe that you are the victim of violence, bullying and/or harassment, including sexual harassment, the first thing you should do is tell the person to stop. Do so as soon as you receive any unwelcome comments or conduct. If violence is imminent or in progress, please follow section 5.0 Procedures When Violence is Imminent or in Progress.

Some of the things you can say that might stop the behavior include:

- “Please stop doing or saying...”
- “It makes me uncomfortable when you...”
- “I don’t find it funny when you...”

If your attempts to stop the behavior have not been successful and/or if you fear reprisal, then you should report the incident(s). Employees who become aware of situations where violence, bullying and harassment may be occurring should report the suspected violence, bullying and harassment.

HOW TO REPORT ALLEGED OR SUSPECTED VIOLENCE, BULLYING AND HARASSMENT

Reports of alleged or suspected violence, bullying and harassment may be made verbally or in writing using the [Workplace Violence, Bullying and Harassment Complaint Form](#).

Eiffel expects that workers will keep written accounts of incidents to submit with any complaints; the written accounts must include a description of the incident(s), where and when the incident(s) occurred, the persons involved and the names of witnesses,

if any. You will be asked to provide any other evidence or information that you believe are relevant to the complaint, such as emails, handwritten notes, text messages, and photographs, if available.

Reports should be made to the employee's immediate supervisor or manager. If the immediate supervisor or manager is alleged to be involved in the bullying and harassment, then reports can be made to the Safety Officer or the CEO. If you make a complaint in good faith and without malice, regardless of the outcome of the investigation, you will not be subject to any form of discipline. Eiffel will, however, discipline or terminate anyone who brings forward a false and malicious complaint. Any employee who retaliates against someone who has made a complaint in good faith is subject to disciplinary action up to and including dismissal.

CONFIDENTIALITY

All reports of complaints will be handled in a confidential manner. Information concerning a complaint, or action taken as a result of the investigation, will only be released as necessary to conduct a proper investigation, to take disciplinary measures, or where required by law.

BULLYING AND HARASSMENT INVESTIGATION PROCEDURE

All complaints and reports of alleged violence, bullying and harassment will be assessed thoroughly, and an investigation will be conducted if deemed necessary. Most investigations will be conducted internally, however in complex or sensitive situations, an external investigator may be hired. The investigation process will involve interviews of the Complainant, the Respondent and any witnesses named by either. If the Complainant and the Respondent agree on what happened in the incident, the Company will not investigate further and will determine what corrective action to take, if necessary.

Investigations will be:

- undertaken promptly and diligently.
- focused on finding facts and evidence, including interviews of the Complainant, Respondent and any witnesses.
- sensitive to the interests of all parties involved; and
- fair and impartial

The investigation will include:

- interviewing the Complainant and the Respondent to ascertain all of the facts and circumstances relevant to the complaint, including dates and locations.
- interviewing witnesses, if any.
- reviewing any related documentation and evidence.
- making detailed notes of the investigation and maintaining them in a confidential file.

Once the investigation is complete, a report of the investigation results will be kept on record and a summary of the findings will be provided to the Complainant and Respondent.

EMPLOYEE ROLES AND RESPONSIBILITIES

All employees are expected to report suspected violence, bullying and harassment and to cooperate with those responsible for investigating any complaints. Eiffel has a responsibility to prevent any violence, bullying and harassment in the Workplace therefore if any supervisor or manager fails to report incidents of violence, bullying and harassment, or fails to take appropriate corrective action, he or she will be subject to disciplinary action, up to and including termination.

FOLLOW-UP

The Complainant and Respondent will be advised of the findings of the investigation within a reasonable timeframe. Eiffel will keep a written record of investigations, including the findings. Regardless of the outcome of any violence, bullying and harassment complaint made in good faith, the employee lodging a complaint or reporting suspected violence, bullying and harassment, as well as anyone providing information regarding the complaint, will be protected from any form of retaliation by either co-workers or supervisors.

CORRECTIVE MEASURES

If disciplinary actions are deemed necessary, they will be taken within a reasonable timeframe, however the nature or details of the disciplinary actions will not be shared with the Complainant or anyone else unauthorized to receive the information due to the confidential nature of disciplinary actions.

Management will determine what action should be taken as a result of the investigation and inform the Complainant and Respondent of the findings of the investigation; based on the outcome of the investigation, the following corrective measures will be taken, if necessary:

- disciplinary action, up to and including termination.
- referral for counseling, anger management training or attendance at educational programs on workplace respect.

If there is not enough evidence to substantiate the complaint, corrective measures will not be taken.

TRAINING

All managers, supervisors, and employees are educated on the company workplace violence, bullying and harassment program during their initial orientation after being hired and as required therein after.

- The information in this manual does not take precedence over OH&S Act, Regulations or Code, or any other government legislation, with which all workers should be familiar.



CEO – Daniel L. Loudon

6.5 PPE POLICY

Eiffel group of Companies genuinely cares about the health and safety of employees and contractors. Our care and concern for employees, visitors and others mandates that Personal Protective Equipment (PPE) must be worn by employees, contractors, sub-contractors, and visitors when danger from personal injury exists and as specified in rules, safe work practices, safe job procedures, Safety Data Sheets (SDS), legislation and when stipulated in contracts. PPE is a person's last line of defense to reduce exposure to hazards and to reduce the severity of the injury or illness if contact with a hazard occurs.

Eiffel expects the employee to supply and use the basic personal protective equipment. This includes CSA approved hard hat, and CSA Approved steel-toe lace-up boots that provide adequate ankle protection (min 6"). Workers are expected to have these with them when they report for work along with company issued high-visibility safety vest and ID Badges.

Eiffel supplies specialized personal protective equipment to workers as required. This equipment meets the appropriate CSA standards. The Company will maintain appropriate inspection and service LOGS/RECORDS for specialty PPE.

Personal protective equipment used by employees must be worn and maintained in a sanitary and reliable condition. Efforts are made to minimize hazards through the use of engineering controls, systems, work practices and administrative controls. When this is not practical then personal protective equipment must be used.

All PPE that is of questionable reliability, damaged, or in need of service or repair, will be removed from service immediately and be tagged "OUT OF SERVICE" or "LOCKED OUT" by employees or supervisors and be returned and/or replaced. No piece of PPE should be modified or changed contrary to its manufacturer's instructions or specifications or the Occupational Health & safety Regulations.

All personnel will be trained in the selection, fit, use and care of PPE. Employees are responsible for keeping PPE in good working condition and notifying their supervisor if any PPE no longer meets safe standards. PPE required must be selected and used in accordance with legislation requirements and job specific hazard assessments.

All PPE must meet CSA standards.

Information gathered from the Job Hazard Analysis, applicable legislation, and the experience of management and workers will help you in your selection of appropriate PPE for your operation. In cases of special problems such as chemical handling or working at heights, you may wish to call on outside expertise to assist in the selection of PPE.

- The information in this manual does not take precedence over OH&S Act, Regulations or Code, or any other government legislation, with which all workers should be familiar.



CEO – Daniel L. Loudon
EIFFEL GROUP OF COMPANIES

6.6 SELECTION OF PERSONAL PROTECTIVE EQUIPMENT

Personal Protective Equipment (PPE) should be selected based on the following information:

- Hazard Assessment
- Safety Data Sheets
- Client Requirements
- Safe Work Practices/Safe Job Procedures
- Occupational Health and Safety Legislation requirements

P.P.E. Requirements

Hard Hats (Occupational Health & Safety Code Section 234)

- Hard hats are required to be worn 100% of the time while working on the exterior of a project and are to be worn 100% of the time while working on the interior of a project until drywall stage is complete. (Construction)
- On all worksites where overhead hazards exist
- Hard hats shall not be painted and shall be in good condition.
- Hard hats are not to be worn over other caps.
- Any hard hat that has received a severe blow or been damaged in any way shall be replaced.

Foot Protection (Occupational Health & Safety Code Section 233)

- CSA approved steel toed work boots are required to be worn 100% of the time when on the exterior of the structure and are to be worn 100% of the time until final flooring is put down. (Construction)
- Where feet are at risk from falling objects or other hazards.

High Visibility Vests (Occupational Health & Safety Code Section 194)

- Shall be worn in all circumstances where employees are exposed to traffic or mobile construction equipment hazards.
- Company safety vests are required to be worn 100% of the time unless it causes a hazard.

Eye Protection (Occupational Health & Safety Code Section 228-230)

- Safety glasses are to be worn in all circumstances where eye injury potential exists.
- Safety goggles are to be worn when there is potential exposure to chemical splash or leak.
- Full face shields must be worn while operating chainsaw, grinders, etc.

Hearing Protection (Occupational Health & Safety Code Section 222)

- Must be provided and worn by employees who are exposed to noise levels greater than 85 dba.

Fall Arrest Equipment (Occupational Health & Safety Code Part 9)

- Fall arresting equipment is required in all circumstances when there is danger of falling greater than 6 feet, and the worker cannot, or is not protected from falling by other means, such as safety rails.

Limb Protection (Occupational Health & Safety Code Section 242)

- Employees are required to wear a minimum of long pants and short sleeved shirts at all times.

Respirators (Occupational Health and Safety Code Section 244-245)

- Employees will wear respirators as situations require based on hazard assessments, safe work practices and/or safe job procedures.

All equipment must meet regulatory and Canadian Standards Association (CSA) or Occupational Health & Safety Administration (OSHA) requirements.

See PPE Codes of Practice for more information.

6.7 DRUG & ALCOHOL POLICY

Eiffel Group of Companies recognizes that employees who use or are impaired by drugs or alcohol while performing work endanger not only themselves, but their co-workers and others affected by the work. Eiffel's policy regarding such conduct is one of zero tolerance and employees must be aware that any violations they commit may result in disciplinary action up to and including termination.

However, Eiffel also recognizes that addiction to drugs or alcohol is a serious health problem. The intent of this policy is to accomplish the health and safety goal in a manner that is fair, humane and consistent with employees' accommodation rights under discrimination laws. The goal is not to punish but help employees identify and get help for their substance abuse issues so that they can return to work healthy, safe, happy and productive.

2. Purpose

The objective of this drug and alcohol policy is to ensure that all employees report to work fit for duty. Adopting this Policy is a reasonably necessary measure that Eiffel is required to take to ensure the health and safety of workers and its sites and facilities under Section 2 (1) of the Alberta Occupational Health and Safety Act (OHS Act).

3. Scope

This policy applies to all individuals that work at Eiffel including but not limited to full-time, part-time, temporary and contract employees, independent contractors, volunteers, and employees of third-party contractors or subcontractors that Eiffel engages to perform work at its sites.

a. Union Employees

This policy applies to both union and non-union employees but is not intended to supersede or circumvent the provisions of any current collective agreement that Eiffel has negotiated with an employee's union. In the event of a conflict between this Policy and a collective agreement, the latter shall control.

b. Contractor Employees

This Policy applies to individual employed by contactors or subcontractors that perform work at Eiffel sites but is not intended to supersede or circumvent the provisions of any current collective agreement that Eiffel has negotiated with their own workers and their unions. In the event of a conflict between this Policy and a collective agreement, the latter shall control.

4. Definitions

For the purpose of this policy:

"Drugs" include:

Narcotics and illegal drugs.

Marijuana whether used or obtained legally or illegally; and

Legal prescription and over-the-counter medications and drugs that cause or have the potential to cause impairment and render an employee not fit for duty.

"Fit for duty" means a state of physical and mental that allows an individual to perform his or her job duties safely and effectively without impairment due to the use of or after-effects of alcohol, illegal drugs, legal medications and other health conditions.

"On duty" includes reporting for and performing work, including:

Scheduled work.

Unscheduled call-in work.

Work performed on Eiffel sites.

Work performed for Eiffel away from company sites, including but not limited to driving or travelling to and from work.

"Bona Fide Occupational Requirements" is a legal term for the essential tasks required to perform a job. All job descriptions at Eiffel will contain Bona Fide Occupational Requirements (BOER).

"Safety-sensitive job" means positions that have a direct and substantial impact on the health and safety of the employee, other workers, customers, visitors, the public, property and/or the environment, including but not limited to those involving driving, operation of machinery or equipment, handling of toxic substances and others determined by Eiffel.

"Substance Abuse" means the use of alcohol, illegal drugs, legal marijuana and medications and other substances that can impair a person's judgment, clarity and functioning and render him/her not fit for duty.

5. Requirements for Employees

All employees and workers covered by this Policy are required to:

a) Come to work fit for duty.

- b) Always take reasonable care to protect the health and safety of themselves and others while on duty as required by Section 2(2) of the OHS Act.
- c) Refrain from using or being impaired by alcohol or drugs while they are on duty.
- d) Refrain from possessing, purchasing, selling, distributing or engaging in any other conduct involving alcohol, drugs or illegal substances or paraphernalia while they are on duty.
- e) Refrain from misusing or being impaired by prescription or non-prescription drugs while they are on duty.
- f) Notify their supervisor if they suspect that a co-worker is unfit for duty; and
- g) Submit for drug and alcohol testing in accordance with the Eiffel Testing Policy

6. Legal Marijuana

a. NO Exemption for Legal Marijuana Use

All employees must understand that marijuana is an impairing drug and that using it at work or coming to work high renders them unfit for duty in violation of this Policy. This is true regardless of whether their use of marijuana is legal under federal drug laws.

b. Employee Duty to Notify

Employees must notify their supervisor if they are using legally prescribed medical marijuana or other legal prescription and non-prescription drugs that may cause impairment for the treatment of a medical condition. Off-duty and legal use of such drugs does not violate this Policy as long as employees are always fit for duty when they are on duty.

7. Support for Employees with Substance Abuse Issues

Although Eiffel reserves the right to discipline, it also recognizes that addiction and substance abuse is a health problem. Eiffel is prepared to help employees get counseling, treatment, rehabilitation and support they need to overcome those problems. Existing workers who become dependent or addicted to any drug or alcohol are required to disclose to Eiffel the dependency or addiction. New workers at the time of hire must disclose an addiction or dependency to Eiffel.

Eiffel strongly encourages employees with substance abuse problems to step forward and request help voluntarily. Employees who do self-report will not be subject to discipline if they have complied with their obligation to be fit for duty under this Policy.

8. Fitness for Duty Medical Assessments

Employees may be asked to undergo medical assessments to ensure they are fit for duty before being placed in a safety-sensitive job. Assessments will address substance abuse and may be performed:

- Prior to employment when individuals are applying for safety-sensitive jobs.
- Before current employees are transferred to non-safety sensitive jobs; and
- Periodically for as long as the employee remains in a safety-sensitive job.

Medical assessments will be performed by qualified healthcare professionals following appropriate medical practices and results will be kept confidential to the extent required by personal privacy laws.

9. Disciplinary Investigations

Eiffel may open a disciplinary investigation to check whether an employee is engaged in substance abuse or otherwise in violation of his/her fitness for duty obligations under this Policy in response to:

- Complaints or concerns by co-workers, supervisors, etc.
- Declining performance.
- Erratic behavior.
- Involvement in safety incidents including near misses.
- Arrests for impaired driving, drug offences and similar violations; and
- Other indications that the employee has substance abuse issues or is otherwise not fit for duty

Investigations will be carried out in accordance with Eiffel Disciplinary Investigation Procedures.

10. Drug & Alcohol Testing

Employees may be tested for alcohol and drugs in accordance with Eiffel testing policies. Supervisors will escort employees to the screening site for testing. Refusal to submit for testing will be grounds for immediate termination under this Policy.

11. Privacy

Eiffel recognizes that test results and related information is protected personal information under privacy laws and will keep it confidential and secure and refrain from using or disclosing it except as permitted or required by law.

12. Consequences of Violations

Violation of this Policy is grounds for discipline up to and including termination in accordance with the Eiffel Progressive Discipline Policy. Employees with substance abuse issues on administrative leave may also be referred for counseling to the appropriate agency.

13. Assistance & Reinstatement

Eiffel reserves the right to place employees with substance abuse issues on administrative leave and enter into Last Chance Agreements offering them the opportunity to return to work if they successfully complete the terms of their treatment and rehabilitation program, pass drug and alcohol tests and meet other conditions of reinstatement.

14. Employee Right to Accommodations

Eiffel recognizes that drug and alcohol addiction is deemed a disability under the Alberta Human Rights Act. Accordingly, in administering the disciplinary and other provisions of this Policy, addictions and other substance abuse related to disabilities, such as use of medical marijuana or prescription drugs for chronic pain and debilitating conditions, will be treated as non-culpable violations and employees will be offered reasonable accommodations based on their individual circumstances and capabilities to the point of undue hardship.

- The information in this manual does not take precedence over OH&S Act, Regulations or Code, or any other government legislation, with which all workers should be familiar.



CEO – Daniel L. Loudon
EIFFEL GROUP OF COMPANIES

6.8 VEHICLE POLICY

VEHICLE USE

Company vehicles are not to be used for personal use unless approved by the Owner.

If an employee needs to get a vehicle repaired, confirmation is required as to what vehicle to use while the vehicle is being repaired. If the employee takes it upon himself to lease or rent a temporary vehicle without permission, the employee will be responsible for the cost.

Employees will be required to sign vehicles out when in use and sign them back in when not in use. Only Approved Drivers may drive company vehicles.

DRIVER SELECTION AND APPROVAL

The selection of competent drivers forms the basis for the success of the Health, Safety, and Environmental Program. It must conform to Eiffel Group of Companies standards, the requirements under the local, provincial and federal standards as well as industry standards for vehicle operators.

Drivers must be selected based on their experience with similar work, technical knowledge, physical ability to complete the task, and a safe attitude toward vehicle operations.

To be approved to operate a company vehicle, a driver must:

- Be a current Eiffel Group of Companies employee.
- Possess a valid license of the appropriate class and conditions for the vehicle they are hired or required to operate.
- Provide a Driver's Abstract and/or sign Drivers Abstract authorization form

The Manager is responsible to ensure that all employees complete and sign the "Authorization to Obtain Driver Record Abstract Form" and that form is to be kept on file.

An Approved Driver must meet all the following criteria:

- Must have a valid Driver's Abstract
- Be over 18 years of age
- Be approved by Eiffel Group of Companies
- Have no major regulatory imposed suspensions of driving privileges in three years
- Only Approved Drivers can operate company vehicles

Without Approved Driver designation, an employee or subcontractor will not be allowed to operate a vehicle or equipment owned or leased by the company under any circumstances.

All Approved Drivers are restricted to operate vehicles allowable under their license classification specified by the Provincial Motor Vehicles Branch. It is management's responsibility to approve or revoke the driving privileges of all team members.

Accidents that occur while operating company-owned or company-leased vehicles could result in immediate suspension of driving privileges. After an internal investigation by management is completed and the findings are reviewed, driving privileges may or may not be reinstated.

RENEWAL OF DRIVING APPROVALS

- A new Driver's Abstract may be pulled semiannually
- All Approved Drivers may be asked by management to produce a valid driver's license at any time. Failure to do so will result in their driving privileges being revoked until proof of a valid license is shown.

The onus is on the driver to inform management if their driving record changes. Changes may include traffic tickets, major violations or any imposed regulatory suspensions. Failure to inform management may result in immediate and potentially permanent loss of driving privileges.

MAJOR VIOLATIONS UNACCEPTABLE FOR DRIVING APPROVAL

- Failure to report an accident
 - Failure in event of an accident to give a name or lying to police
 - Improper passing of school bus
 - Improper passing/speeding in a school/playground zone
 - Driving while under suspension
 - Racing
 - Careless driving
 - Driving with undue care and attention
 - Dangerous driving
 - Impaired driving
 - Failure/refusal to take breath or blood test
 - Failure to stop at the scene of an accident
-

- Failure to stop for a police officer

SAFE DRIVING

TRANSPORTATION AND EQUIPMENT SAFETY

This policy applies to all vehicles owned, leased or operated by Eiffel Group of Companies and includes all employee vehicles for which an hourly or monthly allowance is paid, or for personal vehicles used for company business.

Vehicle collisions and damage is almost always preventable and must always be reported. Prevention of these incidents is a shared responsibility among management and employees, customers and the public.

Definitions

Vehicle Incident: An incident or collision involving any vehicle owned, leased or rented by Eiffel Group of Companies.

Preventable Vehicle Incident (PVI): An incident is deemed preventable if the driver fails to exercise sound judgment in his driving practices or does not comply with all regulatory requirements and company policy and/or fails to do everything possible to prevent the incident.

Non-Preventable Vehicle Incident (NPVI): For purposes of fault as well as driving an incident is deemed non-preventable if a driver exhibits sound judgment in his driving practices, complies with all regulations and company policy and does everything reasonable to prevent the incident.

Serious Vehicle Incident (SVI): Any incident or collision that must be reported to Police, Occupational Health and Safety or other regulatory bodies.

- Incidents or collisions that result in moving traffic violations under the Highway Traffic Act.
- Incidents or collisions that result in charges under the Criminal Code of Canada.
- Incidents or collisions that result in an injury classified as Lost Time or Medical Aid for any employee at the work site.
- Incidents or collisions that result in environmental, property damage, equipment damage or other loss in excess of \$5000.00

GENERAL SAFETY

All personnel entrusted with company vehicles are expected to abide by the law when behind the wheel. Neglecting to do so may be grounds for disciplinary action or termination. We expect you to take seriously the safety of yourself, your passengers, company property and the general public at all times.

We expect all our drivers to demonstrate respect on the road, and this is especially the case when in our company vehicles and vehicles with our logo.

A seatbelt must be worn always. Ensure the vehicle has an emergency road kit.

In the event of a flat tire, a worker is to replace the flat tire with a proper spare tire. All tire assemblies, disassembles and repairs are to be completed by a professional. This task is not to be performed by a worker.

Use another person to guide you when backing if you do not have a clear view of where you are going or the movements of other vehicles and people.

No cellphone use while driving. Cellphone use may only be permitted via "hands-free" Bluetooth so long as it does not interfere with your ability to pay attention to the road. We have a zero-tolerance policy on distracted driving.

Do not drive while under the influence of medication which could cause drowsiness; only drive while well rested. Driving under the influence of illegal drugs or alcohol is forbidden and will result in immediate dismissal. We have a zero-tolerance policy for driving while under the influence.

Supervisors are responsible to facilitate and/or provide proper instruction to their workers on protection requirements and training.

TRANSPORTATION OF EMPLOYEES AND SUBCONTRACTORS:

- Employees and subcontractors must not enter or exit a moving vehicle.
 - No riding on running boards, fenders or outside of trucks, trailers or equipment.
 - Always wear seatbelts while the vehicle is in motion.
 - Consumption of drugs/alcohol while driving or being driven in company vehicle will result in dismissal.
 - No stopping on a trestle or bridge for loading or unloading.
 - If loading or unloading on a roadside, pull completely off and use emergency four-way flashers. Enter and exit vehicle only when safe to do so.
 - Do not store loose equipment or flammable materials in the passenger compartment under any circumstances.
-

TRANSPORTATION OF DANGEROUS GOODS

The TOG Act and Regulations are designed to protect the public through safe handling and containment of dangerous goods and to protect emergency response personnel with information about the hazards of dangerous goods in the event of an incident involving a spill or release.

General Responsibilities

The following standards will be adhered to in all operations:

1. Every container of dangerous goods, no matter what shape or size, will be labelled.
2. Vehicles that transport dangerous goods must display the applicable placards.
3. All employees who handle, transport, and/or ship dangerous goods must be trained and certified or only perform the handling, shipping or transporting activities under the direct supervision of trained and certified employees.

INCIDENT REPORTING AND CLASSIFICATION

The primary objective is to eliminate injury and reduce monetary loss through the prevention of incidents. All vehicle collisions and the damage are preventable. All incidents must be reported and investigated.

Driver Response Following a Vehicle Incident:

- Stop the vehicle and shut off the engine.
- Care for the injured and provide necessary first aid.
- Protect the scene from a further mishap by placing reflective triangles or reflectors 30 meters to the front and rear of the collision. If the collision occurs at night, the reflectors must be placed 75 meters from the collision.
- Ensure witness names, vehicles and insurance information and third-party information is collected.
- Do not admit liability or provide an opinion.

Ensure all information reported to Eiffel Group of Companies and the investigating authorities is factual.

Investigation and Follow-Up

Sound investigations provide Eiffel Group of Companies with the tools necessary to identify the root causes of incidents and to implement appropriate corrective measures to prevent recurrences from the same basic causes.

Incident Classification

When a vehicle incident occurs, the incident must be classified as preventable or non-preventable. An incident is deemed preventable if the driver fails to exercise sound judgment in his driving practices or does not comply with all regulatory requirements and company policy and/or fails to do everything possible to prevent the incident.

For purposes of fault as well as driving, an incident is deemed non-preventable if a driver exhibits sound judgment in his driving practices, complies with all regulations and company policy and does everything reasonable to prevent the incident.

WEATHER AND ROAD CONDITIONS

The safety of our people and the public is our top priority. Every driver is responsible for matching the vehicle speed to the road conditions. Please make note of the following general

winter and road condition suggestions, and also refer to your Safety Manual for additional guidance:

Drive defensively.

Icy road conditions are prone to accidents so please take it slow. Speed is to be adjusted downward for adverse weather or road conditions.

Remember to plug in your vehicles. This is especially important for diesel vehicles, as they may not start in cold weather.

Reduce your speed on gravel roads. On non-posted gravel roads, the maximum allowable speed limit is 80 km/hr. if road or weather conditions permit. When travelling on gravel roads, slow down for approaching traffic to reduce the potential of damage to vehicles due to flying debris.

When driving in the winter, leave extra distance between you and the vehicle ahead of you. Stopping on ice takes about eight times the distance that it takes on dry pavement. Be especially aware of icy patches on the road.

Clear windows before starting.

Your headlights should always be on. In heavy snowfall use low beams or fog lamps if available.

Where possible, engage 4x4 in icy conditions and off-road.

Avoid using cruise control on icy roads.

Accelerate and brake gently to reduce skids or spinouts.

Ensure winter clothing does not restrict movement, vision or hearing. Ensure the fuel tank is full when possible.

Ensure you are familiar with the installation and removal of snow chains. Perform a "walk around" prior to travelling.

VEHICLE SAFETY INSPECTIONS AND MAINTENANCE

Regular safety inspections are to be performed on company vehicles. Vehicle Daily Inspection Sheets must be filled out thoroughly each day to show that the vehicles are in proper working order. Vehicle Maintenance Request Forms are available for vehicle maintenance, not including regular oil changes or carwashes.

If maintenance is required on your vehicle, be sure to address the issue immediately. On the Vehicle Daily Inspection form, there is an option to check off that maintenance is required and then a new form titled Maintenance Request form that needs to be filled out and the action taken recorded.

Company vehicles are required to be kept clean at all times. See Forms HSF-6 for Vehicle Inspection Forms.

TRUCK TOOL INVENTORY SHEETS & SAFETY BINDERS

Keeping up-to-date Truck Tool Inventory Sheets helps with insurance claims, equipment inventory, and SDS inventory. Please ensure that your inventory sheets track a list of the tools kept in your truck and that this list is maintained properly.

You should also have a Safety Binder in your vehicle. These are controlled confidential documents that have been named and recorded as being issued to each individual employee. It is an important and valuable safety resource. For those individuals working in the field who consider their truck their office on a day-to-day basis, these binders need to be readily available and therefore must be kept in their vehicle as per OH&S regulations.

TRACKING FUEL AND MILEAGE

It is Policy that all fuel and mileage cost must be tracked daily in a fuel log.

This is a requirement for Revenue Canada tax audits and all fuel and mileage costs reported must be justified by detailed fuel and mileage logs. Company vehicles are not to be used for personal use for this reason. Company vehicles are made available to employees for company and emergency calls. Logs are monitored on a two-week basis.

6.9 WORKING ALONE

Definition: “To work alone” means to work alone at a work site or travel to a worksite in circumstances where assistance is not readily available in the event of an injury, illness or emergency.

According to Alberta’s OH&S Act, Regulation and Code, **Eiffel** has the responsibility to minimize or eliminate risks associated with employees working alone.

Eiffel Group of Companies will first conduct a hazard assessment to identify existing or potential hazards arising from the conditions and circumstances of the worker’s work.

Working alone is considered a hazard for the purposes of Part 2 of the AB OH&S Code.

Eiffel Group of Companies will, for any worker working alone, provide an effective communication system consisting of:

- a) Radio communication,
- b) Landline or cellular telephone communication, or
- c) Some other effective means of electronic communication that includes regular contact by the employer or designate at intervals appropriate to the nature of the hazard associated with the worker’s work.

If effective electronic communication is not practicable at the work site, **Eiffel Group of Companies** will ensure that:

- a) The Project Manager or designate visits the worker, or
- b) The worker contacts the Project Manager or designate at intervals appropriate to the nature of the hazard associated with the worker’s work.

Employees of **Eiffel Group of Companies** are required by the Act to work safely and cooperate with their employer by following the health and safety rules.

PROHIBITION OF WORKING ALONE:

Working alone is prohibited when work involves the following:

1. Enclosed Space Procedures
2. Working with:
 - High voltage electrical equipment
 - High-energy materials (radioactive, high temperatures)
 - Toxic gas, liquids or solids
 - High pressure systems
 - Moving equipment or machinery
3. Working in extreme weather conditions
4. Handling or transferring flammable or toxic liquids.
5. Maintenance and service work (low risk)

ELEMENT 7

INSPECTIONS & MAINTENANCE



7.0 INSPECTION POLICY

Eiffel group of Companies believes its employees are its most important resource. Thorough inspections of all tools, equipment and worksites protect the health and safety of our workers.

Formal inspections are to be conducted at stipulated frequencies and documented. Informal inspections are to be done on an ongoing basis prior to all employee activities.

Senior Management is responsible for the overall operation of the program. Managers are responsible for directing formal inspections on job sites that they control, and for involving workers in such inspections. Supervisors are responsible for conducting ongoing formal and informal inspections where their crews are working. Employees are responsible for participating in the inspection program, both formal and informal. The Health and Safety Officer will conduct inspections on random job sites to ensure all company health and safety rules, practices and procedures are being followed. The frequency of these inspections will be determined by specific contractor requirements and time spent on the job site. The HSA will also review all inspection reports and use the results as a basis of discussion at safety meetings.

The inspection identifies conditions and hazards in the workplace which can lead to an incident. Inspections also identify positive conditions, behaviours, and observations.

During an inspection, both activities and conditions in the workplace are carefully examined. Situations that have the potential to cause injury or damage (unsafe acts or unsafe conditions) are identified and corrective actions are initiated.

All of this company's facilities and job sites shall be included in the inspection program.

- The information in this manual does not take precedence over OH&S Act, Regulations or Code, or any other government legislation, with which all workers should be familiar.



CEO – Daniel L. Loudon
EIFFEL GROUP OF COMPANIES

7.1 TYPES OF INSPECTIONS

Eiffel uses TWO main types of Inspections:

Informal (Ongoing) Inspection

Informal inspections include the *daily*, visual inspection of workplace conditions, tools, equipment, vehicles, PPE, environmental conditions, etc. These inspections are conducted by all workers as a part of their regular work tasks and recorded on the FLHA and/or Daily Vehicle Inspection Forms.

Pre-use inspections are conducted to ensure the worker is set up for a successful shift, every shift.

Formal Inspection

A formal documented process of observing people, equipment, materials and the working environment to ensure the identified hazards are being recognized and that the recommended and implemented hazard controls are being used to prevent the identified hazard from becoming an incident. All formal Inspections will be completed on the corresponding Inspection Report for that specific area. (e.g., Monthly vehicle inspection form, Office Inspection form, etc.) These inspections will involve management, supervisors and employees who must inspect all aspects of people, equipment, materials, and the environment.

Formal Inspections must be completed to the following minimum standards. Where a hazard assessment, task or client requirement dictate, inspections will be completed on a more frequent basis.

Office: All office staff will participate in inspections of the main office on a rotating schedule, minimum of 4 per year.

Shop/Yard/Vehicles: Monthly

Storage Unit: Monthly

Job sites: will be inspected **as required** as they are constantly changing from project to project with a minimum of once per month.

Corrective Actions

Where deficiencies have been identified in inspection reports, individuals must be assigned the responsibility of ensuring that the deficiencies are corrected.

Target dates must be assigned, and it is the manager's responsibility to ensure that corrective actions have been completed and are effective.

Third Party Safety Deficiencies

If the inspector identifies unsafe conditions or acts for which others are responsible, the report shall be forwarded to the responsible company.

Should the responsible company not act on the deficiencies, management must be notified to address.

Inspections should focus on the positive; commending safe work performance and identifying work practices and conditions that could contribute to an incident.

7.2 PREVENTATIVE MAINTENANCE PROGRAM

It is the policy of Eiffel Group of Companies to maintain all tools, vehicles and equipment in a condition that will reduce risk of injury or property damage and maximize the safety of all personnel.

To accomplish this, our Preventative Maintenance Program shall include the following components:

- Adherence to applicable legislation, regulations, standards and manufacturer's specifications.
- Inspections and maintenance services will only be performed by competent personnel.
- Inspections and maintenance services will be completed as per the company's Maintenance Schedule.
- All maintenance work will be documented and retained on file.
- All tools and equipment found to be defective will be appropriately tagged and removed from service. All tools and equipment that have been removed from service will be destroyed or tagged "OUT OF SERVICE".
- All subcontractors are subject to tool and/or equipment inspection by Eiffel Group of Companies.

The use, care and proper maintenance is a shared responsibility of all employees and requires co-operation and collaboration between all management and employees.

An equipment inventory has been established and must be maintained to effectively track and record maintenance history and scheduled maintenance requirements.

The following is equipment that requires monitoring, periodic checks and maintenance:

- Vehicles
- Mobile Equipment
- Emergency Restoration Equipment (e.g., Dehumidifiers)
- Personal Protective Equipment
- Fire Protection Equipment

Maintenance records for equipment will be maintained by Management and will be made available for review during annual COR audits.

All employees affected are required to be familiar with maintenance schedules relevant to equipment being used. Employees are responsible to maintain, or have maintained, all required equipment.

Records for Scheduled and Non-Scheduled maintenance of Vehicles and Mobile Equipment will be kept in the Maintenance Records binders, which are kept at the Eiffel Office.

Defective Tools or Equipment

All tools or equipment that are deemed defective by an employee must be immediately repaired, or if not practical, tagged "Out of Service" and be brought to the attention of the Project Manager so they can be sent for repairs or discarded.

Tools and equipment are not to be modified beyond the manufacturer's specifications.

Safety guards are not to be removed, hindered, or rendered ineffective.

No one shall operate the unit until the defect is repaired.

Vehicle Maintenance

Drivers are responsible for pre-trip inspection of their vehicle and are to report any damages or mechanical problems to the Vehicle Maintenance Supervisor immediately. Particular attention should be paid to the inspection of lights, gauges, tires, brakes, fuel and oil levels and general operating condition of the vehicle.

Vehicles are to be fully serviced and major inspections done at six-month intervals or sooner depending on mileage, operating conditions or manufacturer's recommended intervals.

Mechanical repairs will be completed at the company approved facility.

All vehicles are to have service and maintenance records describing the time and date of repairs carried out.

ELEMENT 8

EMERGENCY RESPONSE



8.0 EMERGENCY PREPAREDNESS AND PROCEDURES

The Emergency Preparedness portion of the program ensures that all employees are aware of the emergencies which can occur at their workplace and that adequate procedures are in place to confront these emergencies.

Eiffel will use the following General ERP in response to any emergencies that may occur, including the office location. It will be customized and updated for the particular concerns of each jobsite using input from affected workers on the site. Each job site has an Emergency Phone Number List that gives the phone number and location of emergency facilities. Personnel are instructed to use the appropriate facility depending upon the nature of the emergency. If a site is being worked on for a long duration, the ERP must be updated regularly to reflect the current circumstances on the job site.

Workers must be familiar with the appropriate courses of action in place for situations requiring care, emergency evacuation, and/or rescue. Workers shall be trained in emergency procedures, roles and responsibilities, including emergency evacuation drills, fire extinguisher use, WHMIS and first aid training for designated first aiders.

Regardless of how careful we may be, there is always a risk of injury or incident requiring emergency preparedness. This element applies to all workers, site visitors, and sub-trades who may be present during an emergency.

Eiffel has identified a number of situations, which would call for the use of an Emergency Preparedness Plan at their company office and their worksites.

These situations would include (but are not limited to):

- a) Fire
- b) Medical Aid/First Aid Emergency
- c) Toxic Release or Chemical spill
- d) Natural Disasters
- e) Pandemic

All workers will ensure 911 services are available from their cell phone prior to starting work. If 911 services are not available, contingency Emergency Response Plan has to be established with owner or supervisor and posted at the worksite.

8.1 Emergency Response Plan

Eiffel Group of Companies - Okotoks Main Office

**322163 15 Street East
Foothills County, AB
T1S 1A3**

Emergency Telephone Numbers

Note: If calling 911 from a cellular telephone, you must state the name of the jurisdiction you are in.

1. Give your name
2. The exact location of the emergency
3. The nature of the emergency
4. The number of people involved
5. Your call-back number
6. Stay on the line until the dispatcher hangs up.

A copy of this form must be posted near each land and mobile phone. Please refer to the map for directions.

Emergency Response Team:

Call 911 first if required.

In the event of an emergency please contact the following in this order:

1. CEO	Daniel Louden	403-988-6703
2. Safety Manager	Cody Thompson	403-700-2639
3. Project Managers	Rod Danforth	587-586-5333
Robbert Ashtion		403-860-2171

Emergency (Ambulance/Police/Fire/Air Ambulance): 9-1-1

24-Hour Max Property Restoration Emergency Response: (403) 519-5877

Fire (Non-Emergency): (403) 938-4066 (Okotoks) or 403-233-2210 (Calgary)

Police (Non-Emergency): (403) 938-4202 (Okotoks) or 403-266-1234 (Calgary)

S.T.A.R.S. 1-888-888-4567 or #4567 from a cellular phone

Occupational Health & Safety (OH&S):	1-866-415-8690
Worker's Compensation Board (WCB):	1-800-661-9608
Alberta One Call:	1-800-242-3447
AEUB – Alberta Energy and Utilities Board:	1-780-538-5138
Alberta Environmental Protection:	1-800-222-6514
Fish & Wildlife:	1-780-827-3356
Forestry:	1-780-865-8267
Poison Control Centre:	1-800-332-1414
Transportation of Dangerous Goods:	1-800-272-9600

Hospitals:

Foothills	403-944-1315 1403 – 29 th Street NW
Peter Lougheed Centre	403-943-4999 3500 – 26 th Ave NE
Rocky View	403-943-3449 7007 – 14 th Street SW
South Health Campus	403-956-1111 4448 Front Street SE

Medical & Urgent Care Centres:

Medicentres	1032 17 Ave SW	403-229-1771
Oasis Medical Clinic	2525 Bridlecrest Way SW #90	403-984-3193
Mayland	1905 8 Avenue Northeast	403- 276-6992
Sheldon M. Chumir	1213-4 th Street SW	403-955-6200
South Calgary	31 Sunpark Plaza SE	403-943-9000
Strathmore	200-Brent Boulevard	403-361-7000
Airdrie	604 Main Street S	403-912-8400
Okotoks	11 Cimarron Common	403-995-2600
Cochrane	60 Grande Boulevard	403-851-6000

EMERGENCY EQUIPMENT

Emergency equipment and supplies will be available at every worksite in accordance with OH&S regulations. Inspections are to be conducted regularly as required and documented.

Alarm System

The building is equipped with a security alarm system and surveillance cameras.

Emergency Maps

Are posted throughout the office and most building the company services, indicating location of fire extinguishers, exits, eyewash stations, and first aid supplies.

Fire Extinguishers

Eiffel Group of Companies Main Office:

1 fire extinguisher at the garage entrance/reception area

1 under kitchen sink.

In each company vehicle

Fire Exits

There are 3 fire exits in the Main Office Building:

1 by the main entrance (near kitchen)

1 by the garage,

1 at the rear of the building toward the deck area.

Smoke Detectors

There are smoke detectors throughout the building.

First Aid Kits:

Eiffel Group of Companies Main Office:

1, Level 2 First Aid Kit at the garage entrance/reception area and all commercial sites

Level 1 first aid kits in all company vehicles

Eye wash station

1 at the garage entrance/reception area

1 at all Commercial sites

Spill kits

In safety cupboard located at garage entrance

In each company vehicle

Emergency Plans and Communications

Appropriate emergency communications must be available at each site location.

Emergency phone lists shall be posted or available to workers.

8.2 GENERAL EVACUATION PROCEDURE

Emergency communication:

The person instigating the site evacuation shall:

Pull emergency alarm or instruct that the aerosol-powered horn be sounded as follows:

- a. Three (3) sharp blasts, followed by a
- b. Five (5) second delay, then
- c. Three (3) more sharp blasts.
- d. Repeat several times to ensure that all workers on site have heard this signal.
- e. This person, having the site evacuated, shall ensure all workers and visitors on site have been evacuated.

Upon hearing any alarm or other notification of an emergency situation requiring evacuation, all individuals at the site will:

- a) Advise all visitors, customers, and contractors of alarm, (if possible).
- b) Shut down any equipment being used (if possible).
- c) Help others who are in need of assistance (if this does not put personal safety at risk).
- d) Evacuate the building via the nearest and safest exit; and,
- e) Meet at the designated area shown in the Emergency Evacuation Map – Eiffel Office or designated muster point to have roll call taken by the HSE Coordinator or designated supervisor.

The Supervisor and/or designate must ensure a safe and orderly exit from each respective area including washrooms and offices. The Safety Officer and/or Emergency Designate must ensure prior to leaving the facility; the visitor log and roll call list are taken to verify who is present for roll call outside.

- a) Once the workers have been assembled at the Muster Point, roll call must be completed as soon as possible to ensure that everyone has evacuated the building. During roll call, employees are required to remain calm and quiet and listen for their names to be called.
- b) Once it has been determined that everyone is out safely, do not leave the roll call area. If someone is unaccounted for, do not return to the worksite to search for them, rather, inform the responding fire department of the missing person(s) and wait for further instructions from them.
- c) If the fire department or other applicable response personnel have not already been notified, they must be contacted by calling 9-1-1.

SITE EMERGENCY CONTACT

The supervisor onsite at the time of any emergency is charged with the evaluation and immediate response to rectify the situation or activate the Emergency Response Procedures.

8.3 FIRE EMERGENCY PROCEDURE

When a fire is discovered:

1. DO NOT PANIC! Stay calm.
2. Raise the alarm by shouting FIRE! to alert anyone in the immediate vicinity.
3. Leave the fire area.
4. Sound the air horn / fire alarm.
5. Dial 911
6. Fight the fire ONLY if it is SMALL and you are not alone, and you have been trained in the use of the extinguisher.
7. Always keep yourself between the fire and the exit.
8. Do not put yourself in danger.
9. Evacuate through the NEAREST safe exit in an orderly manner, closing doors behind you.
10. Assist any person with disabilities or injuries.
11. Proceed to the muster point.
12. Stay clear of the arriving Fire Department while proceeding.
13. Gather for roll call. Do not talk while roll call is taking place.
14. Do NOT return to the building until all-clear authorization has been given by the Fire Department.

Emergency Coordinator Responsibilities

- Phone 911 or delegate someone to report a fire at your address.
- Delegate a person to direct the fire emergency team to the building.
- Take a roll call at the assembly area.
- Report any missing persons to fire department / emergency personnel.

Fire Extinguishers and Fire Safety

- Video: (familiarize yourself with fire extinguisher and fire safety basics-consider watching this or other available safety videos) <https://www.youtube.com/watch?v=ktrv34zW7-A>
-

- Use the "P.A.S.S." method to operate a fire extinguisher:

P – **PULL** safety pin from handle.

A – **AIM** the fire extinguisher nozzle at the base of the fire.

S – **SQUEEZE** the trigger handle.

S – **SWEEP** the spray from side to side.

DO NOT PLACE YOUR OWN PERSONAL SAFETY AT RISK!



8.4 Medical Aid/First Aid Emergency

During a situation which involves a serious injury or fatality:

Assess the situation. Protect yourself and prevent any further injury to casualty.

Call 911

Provide the following information:

- Number and location of victim(s)
- Nature of injury or illness
- Hazards involved
- Nearest entrance (emergency access point)

Procedures

- Only trained responders should provide first aid assistance.
- Do not move the victim unless the victim's location is unsafe.
- Take "universal precautions" to prevent contact with body fluids and exposure to bloodborne pathogens.
- Meet the ambulance at the nearest entrance or emergency access point; direct them to victim(s).

Once a First Aid Attendant(s) is at the scene, he/she will then determine the need to cancel the ambulance or upgrade the call.

All site work will stop. All other personnel will move to a safe location or a designated Muster station to receive further instructions. No one is to leave the project without permission.

If you are not involved in the emergency, keep clear of emergency services until the injured party is removed.

1. Inform a first aider of the situation, if they have not already been notified,
2. Shut down any equipment that may pose additional hazards to the individual or responding first aider(s),
3. Keep other workers and visitors back far enough from the scene so they will not become an additional hazard; and
4. Follow any instructions given by the first aider(s) responding.

The first aider responding to the situation will need to assess the situation and determine what initial treatment is required. All steps taken should be in accordance with the First Aid training that has been provided.

In serious injury situations, the first aider must never attempt to transport the injured worker to the hospital; an ambulance must be called. Once emergency response services arrive, they will be able to take over any treating procedures.

PRESERVE AND PROTECT THE ACCIDENT SITE UNTIL INVESTIGATIONS ARE COMPLETE

UNDER NO CIRCUMSTANCES IS THE NAME OF THE VICTIM TO BE RELEASED TO THE MEDIA BEFORE THE NEXT OF KIN HAVE BEEN NOTIFIED.

- If the media should arrive at the scene of the incident before the company has prepared a statement, the most Senior Eiffel representative at the scene of the incident is authorized to release the following statement:

“We are currently dealing with an emergency situation and are working diligently to ensure the safety of personnel, property, public and the environment. A more comprehensive statement will be released as soon as more factual information has been determined.”

- **DO NOT SPECULATE ON THE CAUSE OF THE INCIDENT OR PROVIDE THE MEDIA WITH ANY TYPE OF STATEMENT THAT IS “OFF THE RECORD.”**
- Before admitting the media onto the property, proper steps must be taken to ensure that the area is absolutely safe, and admittance will not hamper emergency services or investigations. The media shall always be accompanied by an Eiffel employee at all times while on location.

MOTOR VEHICLE INCIDENT EMERGENCY PROCEDURE

In the event of a motor vehicle accident immediately take the following steps:

Ensure all occupants of the vehicle are accounted for and responsive. If anyone is ejected from the vehicle, unresponsive or injured **call 911** immediately.

Assess your vehicle's condition to determine if it is safe to occupy and if it can safely be moved.

If your vehicle cannot be moved, call 911 and wait for assistance.

If it is safe to do so, participants should remain in the vehicle with seat belts fastened for everyone's safety until help arrives.

If it is unsafe to remain in the vehicle, participants should cautiously exit and move to a safe location away from traffic but adjacent to the accident site. Turn on hazard lights and put on a safety vest.

Do not smoke or place lit flares within 25' of damaged vehicles or fluids which have leaked from them.

If your vehicle can be moved without creating further hazard, move it to a safe location adjacent to the accident site.

Exchange the following information at a safe location off the roadway:

- Name, address, phone number, insurance company, policy number, driver's license number, license plate number, registration number for the driver and the owner of each vehicle.
- If the driver's name is different from the name of the insured, establish what the relationship is and take down the name and address for each individual.
- Make a written description of each car, including year, make, model, and color and the exact location of the collision and how it happened.
- Do not discuss who is at fault with other parties.
- Do not disclose your policy details.

TOXIC RELEASE OR CHEMICAL SPILL

Some chemicals have the potential to cause environmental damage by entering the sewer system through floor drains or start a fire or explosion, due to their flammability. Upon becoming aware of a spill situation immediately notify the Supervisor. The individual notified will then activate the emergency response procedures as listed below.

1. Ensure that all non-responding employees/individuals have been removed from the area,
 2. Ensure that all sources of ignition have been removed from the spill vicinity,
 3. Obtain chemical resistant gloves and eye protection to avoid eye and skin contact,
 4. Establish a barrier using on-site spill specific absorbents to prevent liquid from spreading or reaching a drain,
 5. Begin soaking up the liquid using the pad absorbents. Allow the material to soak up the liquid before removing; and
-

6. Dispose of the absorbents in the appropriate plastic bags and dispose of them according to the Safety Data Sheets (SDS).

NATURAL DISASTERS

Employee(s) on Scene:

Respond appropriately to the circumstances including one or more of the following:

- a. If imminent danger, move injured worker(s) to safe location.
- b. Contact First Aider and assist in the treatment of injured worker(s).
- c. Contact the Safety Officer and/or Supervisor.
- d. Remove hazardous materials (any flammable or combustible) from immediate area (only if there is no risk of injury).
- e. Cordon off area to other than qualified emergency service personnel.
- f. Disconnect or power off all electrical services (only if there is no risk of injury).
- g. Attempt to remove other materials when these may add fuel to a potential fire (only if there is no risk of injury).

If appropriate, move vehicles and any other transportable items to safety.

EMERGENCY LOCKDOWN PROCEDURES

Lockdown procedures are used in situations that may affect the safety of staff, contractors, visitors and others in the facility when evacuating is not safe. The people in the building take refuge in a secure location. These situations may include:

- **environmental situations** such as chemical spills, biological events, hazardous material leak, explosions.
- **extreme weather conditions;** or
- serious security risk such as **intruders and violence.**

A Lockdown is activated:

- When notified to do so by local police or government,
- When a person armed with a weapon is identified in the facility or on the property, or
- When a physical threat occurs in the form of any individual or group of individuals, with or without a weapon, having the intent to cause injury.

Anyone observing or suspecting a dangerous situation must immediately notify management. Any immediate life-threatening situation must be reported immediately. Management or their designate may activate a Lockdown when an appropriate emergency is evident (see above). Management will immediately notify the police upon activation of a Lockdown.

Always remember to remain calm.

Emergency preparedness **drills** will be conducted regularly (at least annually) to help staff and participants become familiar with procedures.

Eiffel Group of Companies has identified two types of lockdown:

1. Partial Lockdown

This type of lockdown is normally used when a **physical or environmental threat is present outside the facility, and it is not possible or advisable to evacuate.**

2. Full Lockdown

This type of lockdown is used when the **physical threat is already in the facility** and measures need to be taken to:

- prevent the threat from accessing areas and individuals being threatened,
- protect individuals from entering areas where the threat may be present and
- protect individuals from remaining in areas where the threat may be moving to.

Procedures

Partial Lockdown: where it is not possible or advisable to evacuate the building, the following procedures will be followed:

A Manager or designate will communicate a Partial Lockdown by sounding the airhorn and verbally announcing and/or sending emails or text messages.

In the case of external health hazard: (This type of action can be in response to an air contaminant and involves keeping the air contaminates outside the building and protecting persons from putting themselves in medical danger by entering the area of danger.)

- All building occupants should close windows and doors. Turn off heating, air conditioning and ventilation systems.
- Occupants should move upstairs since many agents are heavier than air.
- Radio stations should be monitored for updates and occupants should remain place until authorities indicate it is safe to come out.

In the case of danger due to a physical or environmental threat outside the facility or in the neighbourhood:

- Close all blinds and drapes.
- Turn off room lights.
- Keep all persons away from windows.
- Prepare to move into a full lockdown if required.

Full Lockdown:

You will be notified of a full lockdown procedure through one or more of the following:

- Call or text message to registered cell phones
- Directly by internal personnel
- In person notification by police

For danger due to physical threat inside the facility, the following procedures will be followed:

1. Move immediately to the nearest room you feel is safe with as many people as possible.
2. Lock and barricade the door.
3. Turn off the lights or maintain minimal lighting.
4. Cover all windows with blinds, curtains, etc.
5. Keep back from windows and doors.
6. Lie flat on the floor or take cover out of sight.
7. Turn off cell phones except to report injured people.
8. Keep calm and quiet.
9. Stay in the room until police arrive. Remember it may be several hours before you can be safely evacuated.

WHAT IF SOMEONE IS INJURED?

Follow these steps when safe to do so:

- Call 911 from a hardwired line if possible.
- Place a sign in an exterior window to identify the location of the injured people.

WHO TO CALL?

Call 911.

WHAT TO REPORT?

When contacting authorities, report the following:

1. Your specific location, building name and office/room number.
 2. The number of people at your specific location.
 3. If there are injuries, the number and types of injuries; and
 4. If you have seen an assailant or identified a threat:
 - location and number of suspects.
 - direction of travel.
 - their clothing and description.
-

- their identity if known.
- any weapons or accessories (e.g., backpack); and
- any unusual or threatening sounds (e.g., gunfire or explosion).

WHAT IF FIRE ALARM SOUNDS?

- DO NOT respond normally as a fire alarm during a lockdown may be a ploy by an armed intruder.
- Remain calm in your lockdown secure area, if safe to do so.
- In Case of Fire, follow Fire/Evacuation procedures.

MEDIA RESPONSE

Eiffel Group of Companies will assist the media by providing relevant, honest and prompt answers to questions within the bounds of reason, practicality, and safety. Proper handling of media inquiries is very important. All media inquiries should be handled in a polite and courteous manner. Under no circumstances are media personnel permitted into controlled areas.

No employee is permitted to answer media inquiries and should direct those inquiries to the Supervisor onsite. No comments or statements should be made to the media. All media questions must be directed to the Eiffel Group of Companies Head Office for an official response to an incident.

BUSINESS RESUMPTION PLANNING

As a part of the Emergency Response Planning process, plans for Business Resumption must be developed. In the case of a serious incident, no work will continue without the permission of the investigating police/peace officer or an agent of the Occupational Health and Safety Authority.

ADDITIONAL REPORTING REQUIREMENTS

Depending on the severity of the situation and the outcome of the event, additional reporting requirements may be necessary. Any additional reporting must always be handled by one of the supervisor team members in the required timeline. Any specific reporting requirements have been outlined in the Incident Investigation section of Eiffel HSE manual.

Note: All injuries requiring medical treatment or time off from work must be reported to management immediately and to the Alberta Workers Compensation Board (WCB) within 72 hours.

Serious injuries, where an employee is required to stay in hospital for more than 48 hours, or if there is a fatality, must also be reported to Alberta Employment and Immigration, Workplace Health and Safety.

ELEMENT 9

INVESTIGATIONS



9.0 INCIDENT REPORTING & INVESTIGATION POLICY

Incident prevention requires the discovery, and the correction, of the root causes. In order for this to happen, all must be reported so they can be investigated.

Therefore, it is Eiffel's policy that all employees and contractors report all incidents and **including lost time, injury, vehicle incident, workplace violence, property damage, environmental/biological, fatality, occupational illness and work refusals** as soon as they occur, including **near misses**, to the site supervisor, safety representative/manager, or company contact.

Eiffel shall fully investigate the following incidents:

1. Accidents that result in injuries requiring medical aid.
2. Accidents that cause property damage or interrupt operations with potential loss.
3. Incidents that have the potential to result in (1) or (2) above, such as close calls or near misses.

Provincial legislation requires that every employer shall inform the respective Occupational Health and Safety authorities (WCB, Workplace Health and Safety) immediately of the occurrence of any incidents which:

- Result in death,
- Cause a worker to be admitted to hospital for more than 2 days,
- Involve an unplanned or uncontrolled explosion, fire or flood that causes or has a potential to cause a serious injury,
- Involve the collapse or upset of a crane or hoist,
- Involve the collapse or failure of any component of a building or structure necessary for the structural integrity of the building or structure.
- Involved the major release of a toxic or hazardous substance, or
- Involve illegal harassment or violence.

Incident sites should not be disturbed unless the safety of workers is at risk.

Responsibilities / Reporting Procedure for Incidents/Investigations

1. All employees/sub-contractors are instructed to report all accidents, first aid injuries, occupational illnesses/injuries, fire, fire extinguisher usage, equipment concerns, and near miss incidents to the Site Supervisor as soon as it is possible to do so. Employees are responsible for: assisting their Supervisor in completing any investigation forms; having their injuries recorded by First Aid personnel; completing WCB reports; submitting all medical and WCB reports immediately to the Safety Officer for review. Employees shall be instructed on the reporting process during their orientation.
2. Supervisors shall conduct initial investigations (including near misses) and submit their report(s) to the Safety Manager promptly. Supervisors will be trained in investigation and reporting procedures.
3. Safety Manager shall determine the need for, and if necessary, shall direct, detailed investigations. They shall also determine causes, recommend corrective action, and report to Senior Management. Whenever possible, members of the Joint Occupational Health and Safety Committee will participate in the investigative process and review of incident reports.
4. Senior management shall review all reports, determine the corrective action to be taken, and ensure that such action is implemented.
 - The information in this manual does not take precedence over OH&S Act, Regulations or Code, or any other government legislation, with which all workers should be familiar.



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Conducting Investigations

This is not a disciplinary policy but one in which we can identify the cause of an incident so that corrective action can be taken to prevent a reoccurrence of the incident. Additionally, information will be valuable in meeting the WCB and Alberta OH&S reporting requirements.

Investigation Procedure

Investigations should be conducted by the supervisor in charge of the area and/or personnel involved. Supervisors should assist in the investigation and must review every incident report to ensure that appropriate corrective actions take place.

The person or team conducting the investigation of an accident/incident will utilize the following procedure:

1. Establish and take control of the scene.
2. Ensure that any injured persons are cared for.
3. Ensure that no further injury or damage occurs.
4. Get the big picture of what happened.
5. Examine equipment/materials involved.
6. Preserve evidence, collect and safeguard any physical evidence. Where practicable, the scene of any incident should be left untouched, except for activity necessitated by rescue work, or to prevent further failures, or injuries until the incident has been investigated.
7. Take photographs of the scene.
8. Interview people involved and obtain written statements where appropriate.
9. Analyze all available information to determine the root causes.
10. Look for causes where “the system failed the worker”, not only for those where “the worker failed the system”.
11. Determine what corrective action will prevent recurrence and complete the report.
12. Follow-up to ensure corrective action is completed. A report of the action will be provided to the Joint Occupational Health and Safety Committee.

Note: Incident Investigations are NOT conducted to fix blame. They are conducted to find facts to help prevent recurrence.

Training

Managers, supervisors and JHSC members must be familiar with this policy and associated forms. Training in the investigation process and the company’s specific policy and forms will be determined by company safety manager and communicated to the JHSC.

The requirement to report and investigate near misses and other incidents will be covered during new employee orientation.

Review

The Health and Safety Coordinator will follow-up on all accident investigations and recommendations, which will be reviewed with Management.

This policy should be reviewed at least annually, or when revision is required.

Incident investigation historical records should be reviewed annually by the JHSC in order to:

- Confirm that action required was implemented.
 - Determine if the action was effective in prevention of recurrence.
 - Identify trends.
-

ELEMENT 10 PROGRAM ADMINISTRATION



10.0 PROGRAM ADMINISTRATION

An important step in reducing or eliminating accidents is a determination of the area most in need of attention. Compiling records and statistics is one way to gain some understanding of where to best focus our energy within the program.

The Safety Officer will collect the data necessary to track the effectiveness and performance of the HSE Program.

The data collected will be analyzed to determine where corrective or preventive actions should be taken and will be communicated throughout the organization as deemed appropriate. To preserve EIFFEL GROUP OF COMPANIES employees' right to privacy, names of affected personnel will not be reflected in any safety performance evaluation report or in support documentation.

The Health, Safety & Environmental Program will be evaluated at least annually during the management review process to assess the effectiveness of the program in protecting employee health and safety. Such evaluations will help identify strengths and weaknesses in the program so that appropriate action can be taken. The evaluation will include the following:

- a. Review of legislated updates,
- b. Review of any changes in employee's job responsibilities,
- c. Review of any new or modified equipment and/or processes, and
- d. A review of employee-training records, including new-hires, transferred or promoted employees.

10.1 RECORDS & STATISTICS POLICY

Maintaining current health and safety statistics and records in a central location is a major part of a good health and safety program. Maintaining records of policies, procedures, notices, statements, forms and reports is necessary to fulfill legal requirements and maintain compliance with OH&S Act, Regulation and Code.

Eiffel Group Inc. will maintain records of all safety activities that occur as part of daily business operations, at the main office, for duration of minimum 3 years. Records kept will include (but not limited to):

- Training Records
- Inspections
- Incident and Investigation Reports
- First Aid Records
- Safety Meeting Minutes

Eiffel Group Inc. will maintain records, in order to achieve following goals:

- Monitor and evaluate the company's health and safety performance.
- Monitor and Evaluate specific job site health and safety performance.
- Monitor and Evaluate supervisor or managers health and safety performance.
- Monitor and Evaluate employees' health and safety performance.
- Identify common factors and trends in accidents or incidents, in order to help reduce worksite accidents or incidents.
- Monitor and evaluate effectiveness of corrective actions
- Monitor and evaluate the speed with which corrective actions are implemented.
- Compare company's safety performance to previous years, using statistical analysis

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10.2 PERFORMANCE EVALUATION

Eiffel Group Inc. will maintain and improve the Health and Safety program by successfully completing yearly COR audits. Every third year will be an external, independent audit with the other two years in the three-year cycle internal audits performed by Eiffel safety staff certified in auditing by Alberta Construction Safety Association (ACSA).

Upon completion of the annual audit, an action plan will be developed with items to improve upon and filed in this section. The plan will include: Measurable action items, Target and completion dates, and Individuals responsible for follow-up.

The audit results and action plan will be communicated to all Eiffel staff.

This Action Plan will also be reviewed in the following year to ensure all elements have been implemented successfully.

10.3 Corrective Action Plan

Eiffel Safety Program Corrective Action Plan



Date of Audit: _____

Recommendations	Assigned to:	Target Completion Date:	Date Completed:	Reviewed by:

Signature:

Date:

Form: Eiffel-HSF-28

Issue Date: August 8, 2020

Revision Date:

Revision Number:

11.0 ENVIRONMENTAL

At Eiffel Group Inc., our goal is to minimise our overall environmental footprint. This involves understanding and managing the environmental effects of all of our operations so as to avoid, minimise, mitigate or offset their impact.

Continual improvement of our environmental performance and compliance with all relevant legislation is achieved through continuous monitoring and attention to relevant detail.

11.1 ENVIRONMENTAL POLICY

Eiffel Group Inc. will conduct its business in an environmentally responsible manner.

The Companies are aware of the environmental impacts of its operations and will balance its business with the need to protect the local and global environment. Our Environmental Policy shall earn the confidence of employees, customers and the general public by demonstrating our commitment to comply with all relevant environmental legislation and minimise pollution, resource use and waste, where feasible, through the continual improvement of performance in all areas of the Company.

Eiffel is committed to identifying all activities that have the potential to cause an environmental impact, as well as providing adequate resources to help minimise or prevent any negative impact.

In order to achieve this commitment, we will:

- Identify all environmental impacts that the Company contributes to and establish environmental management procedures that can be incorporated into all business decisions, in a cost-effective manner.
- Regularly measure and evaluate our environmental performance and improve where necessary.
- Promote a culture of continual environmental improvement within the Company.
- Delegate the responsibility for environmental matters to the appropriate levels in the Company.
- Consistently increase the awareness and provide necessary training to all our employees and customers to ensure environmentally responsible concepts are integrated into their normal working practices.
- Demonstrate control of all our operations and ensure that all are performed with due consideration of the environment.
- Identify and mitigate against potential accidents that could result in an environmental impact, so that if an accident did occur the consequences would be minimised.
- Use products that have a negligible environmental impact, where appropriate options exist.
- Minimise the storage and use of all articles and substances, where appropriate.
- Reduce the consumption of resources (energy, materials, packaging), where feasible.
- Minimise waste through a commitment to reuse, recover or recycle, where feasible.

It is our duty to ensure that good environmental management is practised in all contracts and projects that we are involved in, and we will seek to influence customers to demonstrate a positive environmental commitment. The Company will communicate the Environmental Policy to all Eiffel employees, and it will be freely available to customers, and the general public.

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