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**DK Concrete  
Innovations  
Ltd.  
Health and  
Safety  
Management  
System**

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## Introduction & Scope

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The DKCI Health and Safety Management System (HSMS) has been developed to provide a systematic approach to health and safety to have an incident free culture of safety. The HSMS applies to all operations conducted by DKCI. Any new acquisition, project, joint venture, or contract controlled by DKCI shall follow its requirements.

## Terms and Definitions

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**Audit** — An evaluation of an organization’s Health and Safety Management System against an approved standard.

**Audit program** — A set of one or more audits planned for a specific time frame and directed towards a specific purpose. Note: An audit program includes all activities necessary for planning, organizing, and conducting the audits.

**Competent Worker** — A Person who is adequately qualified, suitably trained, and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

**Continual Improvement** — Always striving to innovate, implement and improve on current conditions.

**Contractor** — An individual or employer hired under contract to provide materials or services to another individual or employer.

**Critical Job** — A job with high potential for serious loss or injury.

**Document** — A medium containing information related to the health and safety management system.

**Hazard** — A situation, condition, or behaviour that has the potential to cause an injury or loss.

**Health Hazard:** a physical, chemical, biological, or psychological hazard which may cause acute or chronic health effects in exposed workers (e.g. noise, dust, heat, ergonomics, etc.).


**Safety Hazard:** a substance, process, action, or condition which may endanger the immediate safety of workers (e.g. chemical burns, shear points, slips and falls, etc.).

**Hazard Assessment** — A process used to identify and evaluate the health and safety hazards associated with job tasks and provides a method for prioritizing health and safety hazards.

**Hazard Control** — Method used to eliminate or control loss:

**Engineering Controls:** Preferred method of hazard control if elimination is not possible; physical controls implemented at the design, installation, or engineering stages (e.g. guards, auto shutoff, etc.).

**Administrative Controls:** Processes developed by the employer to control hazards not eliminated by engineering controls (e.g. safe work policies, practices and procedures, job scheduling or rotation, and training).

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Personal Protective Equipment (PPE): Equipment used, or clothing worn by a person for protection from health or safety hazards associated with conditions at a work site (e.g. gloves, safety glasses, fall protection, etc.). Used when engineering or administrative methods cannot fully control the hazards.

Imminent — Danger In relation to any occupation.

Incident (Accident) — A preventable, undesired, and unexpected event that results, or has the potential to result, in physical harm to a person or damage to property (loss or no loss).

Inspection — A planned, systematic audit or examination of an activity or work site, checking or testing against established standards.

Job Inventory — A comprehensive list of jobs/tasks produced from a systematic review of all jobs/tasks in the work area.

Legislation — Provincial, federal, or other government standards in the form of written acts, regulations, and codes.

Manager — A person who administers and/or supervises the affairs of a business, office, or organization.

Near Miss — An undesired event that under slightly different circumstances could have resulted in personal harm, property damage or loss. Also referred to as an incident.

Policy — The documented principles by which DKCI is guided in its management of affairs.

Procedure — A documented method to carry out an activity.

Record — A document that states results achieved or provides evidence of activities performed.

Risk — The chance of injury, damage, or loss.

Root Cause — The underlying or basic factors which contribute to an incident.

Safe Work/Safe Job Procedure — A written, step-by-step instruction of how to perform a task from beginning to end.

System — A set of interrelated or interacting elements.

Unsafe Act — Inappropriate action taken by a person that could result in loss.


Unsafe Condition — A condition that could result in loss.

Visitor — Any person presents at the work site who is not under the direct control of DKCI (e.g. courier).

Work Site — A location where a worker is, or is likely to be, engaged in any occupation and includes any vehicle or mobile equipment used by a worker in an occupation.

Worker — A worker supervised by a manager or supervisor/foreman.



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## 1.0 Management Leadership and Organizational Commitment


Senior management of DKCI shall provide leadership for health and safety activities and assume overall responsibility for the Health and Safety Management System (HSMS). This responsibility includes:

- Establishing, actively promoting and maintaining the HSMS;
- Providing appropriate financial, human, and organizational resources (proper staffing, equipment, training materials and funds) to plan, implement, check, review and correct the HSMS;
- Defining roles, assigning responsibilities, establishing accountability and delegating authority to implement an effective HSMS;
- Reviewing the ESS HSMS at planned intervals; and
- Encouraging active participation on the part of workers and worker representatives in the establishment and maintenance of the HSMS.

### 1.1 Commitment Statement

The DKCI Health and Safety Management System is driven by leadership and commitment from senior management and its readiness to provide resources. ESS is committed to providing a productive, safe, and healthy work environment for our workers, contractors, clients, customers and visitors. Our commitments are communicated to all workers, contractors and suppliers and include:

- To instil a corporate culture where harm to our staff through work is totally unacceptable;
- To be proactive in assessing health and safety hazards for new business, new and existing work systems, practices and equipment;
- To encourage team problem solving at all levels of DKCI to implement work practices that continually improve health and safety standards and productivity;
- To report and investigate incidents and implement systems and practices that prevent reoccurrence;
- To ensure compliance with legal requirements and industry standards;
- To train managers and workers to competently perform work described in safe work procedures;
- To provide information to all workers, contractors and customers that inform them of health and safety issues relevant to DKCI operations;
- To ensure products and/or services are safe and without adverse environmental impact.
- All management personnel and workers have responsibility for implementing this health and safety management system by striving to achieve a zero tolerance towards hazards, incidents, and injuries.
- We will continuously improve health and safety management by setting Objectives, plans and performance measures and regularly reviewing progress against the targets set.
- We will involve our staff in health and safety management through training and by contributing to identifying, assessing and controlling hazards.

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## 1.2 Health and Safety Policy

DKCI is committed to the physical and psychological health, safety, and social well-being of our employees, clients, contractors, the public and the environment. We believe that a proactive approach to incident prevention is essential to achieving our goal of *zero incidents*.

Our Company maintains a Health and Safety Management System meeting or exceeding industry best practices and complying with all applicable Safety Legislation. This is achieved by taking a proactive approach to health and safety and applying continuous improvement principles to manage safety performance.

Senior Management is responsible and accountable for providing a safe work environment for all employees. They will demonstrate a commitment to, and provide active leadership through promoting a work environment where everyone accepts personal responsibility for their own safety and that of others.

Senior Management, Managers and Supervisors are responsible for providing the necessary support, resources, tools, and equipment for employees to perform their work safely. They will actively demonstrate a positive safety attitude to foster a thriving health and safety culture.

Employees at every level are responsible and accountable for the company's overall safety initiatives and working in a manner which will safeguard themselves, their fellow employees, the public and the environment. This includes, but is not limited to:

- adhering to company safe work practices, operating procedures, and rules;
- being familiar with and complying with the applicable safety legislation as it pertains to their work processes, and individual job descriptions;
- participating in safety training programs;
- using the proper Personal Protective Equipment (PPE) as required;
- refusing to perform any task if they believe there exists imminent danger to the health and safety of themselves and/or other workers present; and
- employees have a responsibility and are authorized to "stop work" on any activity or situation they believe poses a danger or a risk to them or a coworker without fear of retribution from management.


Contractors and visitors at the company worksites will be aware of and comply with all relevant legislation, and the company's policies and procedures.

We strongly believe that the overall health and safety of our company is a team effort and that all incidents are preventable. No incident can be considered acceptable and there is nothing more important than ensuring the safety of our people.

**Dan Moisan**  
**January 5, 2023**

## 1.3 Environmental Policy

DKCI recognizes that environmental concerns are of critical importance. DKCI encourages its workers to join with DKCI in full acceptance of and compliance with this policy. We will create procedures that fully comply with federal,

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state, and local regulations. We will provide adequate training to our workers to ensure our workers are aware of these procedures and can follow them.

#### **Protection of the Environment**

We will employ practical measures to protect the environment. We will conserve and protect the water, air, and land resources we use. We will strive to eliminate any releases to land, air or water that may harm human health or the environment. Continuous improvement in our environmental performance will be a principal objective.

#### **Waste Management Policy Statement**

We will work to prevent waste and pollution at the source whenever possible. New facilities and improvements of existing operations will use processes designed to minimize the environmental effects of our operations and will incorporate functional pollution control equipment.

#### **Recycling and Waste Disposal**

We will support recycling programs where practical and will use environmentally safe treatment and disposal practices for waste that is not eliminated at the source or recycled.

#### **Compliance**

We will manage existing facilities so that we meet or exceed legal requirements. We will implement programs and procedures to satisfy compliance. We will conduct compliance audits and monitor procedures and practices to evaluate our performance.

#### **Disclosure**


We will inform our workers of our progress in environmental issues. We will cooperate with the authorities and regulatory agencies in responding to inquiries. We will encourage our workers to report to DKCI conditions that they reasonably believe could be harmful to the environment or pose health or safety hazards so we can initiate prompt corrective actions.

#### **Commitment**

Management will consider the environmental and cultural implications of its decisions.

This policy is to be posted in all DKCI facilities by the supervisor.

**Dan Moisan**  
**January 5, 2023**

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#### 1.4 Lone Workers Policy Statement

Each work site shall develop a Working Alone Plan (see Working Alone Program) and must provide effective radio, telephone, cellular phone or other electronic communication between a worker who works alone and persons capable of assisting the worker in an emergency or if the worker is injured or ill.

Each work site's Working Alone Plan shall address having an established contact person. A person must be designated to establish contact with the worker at predetermined intervals and the results must be recorded by the person.

If electronic communication is not practicable or readily available at the work site, DKCI must ensure that a representative of ESS or another competent worker visits the worker, or the worker contacts ESS or another competent worker.

These visits or contacts shall be at intervals of time appropriate to the nature of the hazards associated with the worker's work. As a minimum contact shall occur no less than every four hours.

The hazard assessment and Working Alone Plan at each DKCI work site must be reviewed on an annual basis or when work processes or arrangements which could affect a worker's well-being are introduced or changed.

#### 1.5 Incident Reporting Policy Statement


DKCI requires the immediate (as promptly as possible) verbal reporting all incidents, workplace-related illness and near misses. The immediate supervisor is initially notified and then the designated Safety Manager shall be contacted (see Emergency Contact List). Written notification shall follow verbal notification. Supervisors are required to complete the ESS Incident Report Form and the Incident Investigation Report Form and utilize the DKCI Witness Statement Form for the workers and witnesses to the incident. All workers will be trained to these standards through employee orientations (Duty to Report) and periodic refreshers will be included in team or safety meetings to reinforce the importance of incident reporting. Failure to report incidents, hazardous work conditions or near misses shall result in disciplinary action.

#### 1.6 Fire Fighting - Incipient Policy Statement

Employees shall only use fire extinguishers if trained. No worker will risk their own or others personal safety in attempting to put out a fire in its initial (incipient) stage. Employees will evacuate and use the appropriate alarm and allow qualified individuals attempt to extinguish the fire.

#### 1.7 Safe Journey Management (SJM) Policy Statement

Each journey exceeding 100 km outside of base operational areas shall be planned, executed, monitored, controlled, and reviewed in a manner that the purpose of the journey is accomplished without any incident. A written request

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and report shall be completed and the Manager. This journey management plan must be performed in such a way as to:

- To minimize risks and incidents during transport or travel operations
- To reduce non-planned events inherent in transportation
- To increase the effectiveness of suitable emergency response planning

Potential journeys involving driving and/or road transport should be screened and assessed relative to hazards, risks, and costs with the following type of questions:

- Is the journey necessary or will phone calls, e-mail achieve acceptable results?
- Must you drive, or is suitable public/commercial transportation available?
- Can the business requirement for a potential journey be delayed and possibly combined with a later trip?
- Can the journey be combined with other people to share a vehicle?
- Is a fit-for-purpose vehicle for the expected route and conditions available (for example, a four-wheel drive vehicle, etc.)?

## 1.8 Injury Management/Return to Work Program

### 1.8.1 Policy Statement


It is the policy of DKCI to maintain and support an Injury Management/Early Return to Work Program. This program is designed to minimize the disruption and uncertainty that can accompany an on-the-job injury for both DKCI and our employees.

It is our goal to maintain a safe workplace for our employees. When an injury does occur, our Injury Management/Early Return to Work Program helps make the process of returning to work as smooth and efficient as possible. This process includes the employee, doctor, and supervisor to ensure your health and recovery is always given top priority.

When an on-the-job injury occurs, you can expect prompt medical attention. If the injury results in a prolonged absence from work, you may be a candidate for our Injury Management/Early Return to Work Program. This program offers a medically approved light-duty transitional assignment in anticipation of a return to full duty, or vocational rehabilitation, if necessary.

The success of this program is the responsibility of everyone in DKCI from top management to every employee. Only by working together can we provide a safe and secure work environment.

Everyone should be alert for potential incidents and strive to eliminate them. If you are aware of an unsafe act or condition, it must be reported immediately to your supervisor to be addressed. This action may prevent an injury from occurring. If an injury does occur, the injury must be reported immediately to a supervisor.

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Thank you for your cooperation and assistance. This policy is to be posted at all DKCI work locations.


**Dan Moisan**  
**January 5, 2023**

### 1.8.2 General Guidelines

- It is the goal and commitment of DKCI to implement our Return to Work Program to return workers to meaningful, productive temporary employment following injury or illness until their health care provider releases them to full duty.
- If a worker is injured on the job DKCI will make all reasonable efforts to return the person to work in any capacity that is approved by their physician and in accordance with governing workers compensation legislation.
- DKCI will track outcomes of the Injury Management/RTW Program and has established a process to address opportunities for improvement of the Injury Management/RTW program.
- Resources will be provided to support the Injury Management/RTW process.
- The return to work program provides opportunities for any worker who sustains a compensable injury during the course and scope of employment to safely return to work. If the worker is not capable of returning to full duty, the return to work program provides opportunities for the worker to perform a temporary assignment, either modified or alternative duty as defined below.

### 1.8.3 Definitions

- Lost Time - Time spent away from work beyond the day of injury at the direction of the treating health care provider because of a compensable injury sustained in the course and scope of employment. The term does not include time worked in a temporary assignment.
- Full Duty - Performance of all duties and tasks of the position for which the worker is employed. Full duty entails performing all essential and non-essential functions of the worker's regular job.
- Temporary Assignment - Performance of a temporary job assignment intended to return an injured worker to work at less than his or her full duties when a serious injury or serious medical condition prevents the worker from working full duty. Temporary assignments are limited to six months at the same pay, beyond six months; the program will be reviewed in assistance of DKCI management to determine the next best course of action. Temporary assignments are modified duty and alternative duty.
- Modified Duty - Modified duty allows the worker to return to employment in his/her regular job and perform all of the essential functions of the position and those nonessential duties and tasks that are within the capabilities of the worker, given the restrictions imposed by the treating health care provider. Modified duty is a temporary arrangement until the injured worker can resume full duty. If during the course of the

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modified duty assignment or after six (6) months, whichever is sooner, it is determined that the worker has permanent restrictions, the program will be reviewed in assistance of DKCI management to determine the next best course of action.

- Alternative Duty - Alternative duty allows the worker to temporarily perform the essential functions of a job and other nonessential duties and tasks, within the restrictions prescribed by the treating health care provider, other than the position for which the individual is employed (regular full-time position). Such alternative duty may be physically located in the same employing department or in a hosting department. Alternative duty is a temporary arrangement until the injured worker can resume full activities of his/her regular job or until an alternate duty position is no longer needed.
- Hosting Department – This is the department that has a temporary assignment position available but not necessarily the worker's department.
- Employing Department - Department that the worker is permanently assigned to for his/her full duty regular job.

#### **1.8.4 Prohibited Actions**

This return to work program shall not be applied to any situation or circumstance in a manner that retaliates or discriminates based on race, color, sex, age, national origin, religion or disability.

#### **1.8.5 Authorization for Leave and Lost Time**

A worker who must miss work due to an injury or illness must be certified by a health care provider to be off work. It is the worker's responsibility to obtain such documentation from the health care provider and to return it to the supervisor within one working day upon receipt. Employees will be reimbursed for any costs in obtaining written documentation from a health care provider with a valid receipt of payment.


If the health care provider states that the worker cannot perform any temporary assignments/ modified duties, DKCI may challenge the decision depending on the injury and request independent medical information. Some DKCI sites have a local health care provider that workers may be requested to visit.

#### **1.8.6 Return to Work Coordination**

DKCI Safety will assist Site Managers/ supervisors with return to work activities/ plans for individuals who have sustained a compensable injury or illness during the course and scope of employment. The DKCI Safety must have adequate training and knowledge of the local provincial WCB requirements.

#### **1.8.7 Communication**

Workers and supervisors are made aware of the program and of its benefits. In addition, all supervisors and workers must understand the processes involved. DKCI will ensure workers are educated in the usage of the early intervention process, as well as, if time away from work is required, the assistance of the return-to-work program provided in reintegrating an injured worker back into the workplace. DKCI shall also communicate with medical practitioners our Injury Management/RTW initiatives.

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### **1.8.8 Temporary Assignment/ Modified Work Procedures**

A worker who is absent due to an injury or illness is required to submit written verification of the injury or illness from a qualified health care provider. Such verification must be submitted to the supervisor within one working day upon receipt of the documentation and in compliance the appropriate local Workers Compensation Act and DKCI policy.

A copy of the worker's regular job description must be supplied to the health care provider.

If the worker is unable to perform the essential functions of his/her regular job, a temporary Modified Work Plan is developed by the HSE Manager in consultation with operations management. The Modified Work Plan must be completed in writing and accepted or declined by worker. The accepted or declined plan must be forwarded to which will forward a copy to the local effective Worker's Compensation administrator.

The worker must obtain the appropriate forms from their supervisor or Safety to be completed by his/her health care provider at each visit or every rotation, whichever is sooner, for assessment of the worker's ability to perform the functions of the temporary assignment/modified work position offered and accepted.

A worker who chooses not to continue a temporary assignment/ modified job must notify the employing/hosting department and/ or Safety immediately in writing. A worker who fails to accept a local workers compensation administrator's approved temporary assignment/modified work job and abandons his/her job may be subject to disciplinary action including termination, but local regulatory requirements must be followed.

### **1.8.9 Employee Reporting Responsibilities**


A worker who is a candidate or participant in a modified or alternative duty temporary job assignment under the Return to Work program is responsible for reporting to the Workers Compensation agency any employment or income earned while performing modified or alternative duty if required by the Workers Compensation agency.

A worker participating in the Return to Work program must provide his/her supervisor with medical documentation accounting for all absences due to the injury/illness within one day of any absence from work, or face disciplinary action, up to and including termination.

### **1.8.10 Non-Retaliation**

Retaliation against an individual for in good faith filing a request or making a claim under this or related policies, for instituting or causing to be instituted any proceeding under local regulatory guidelines or federal anti-discrimination or anti-retaliation laws, for testifying in an investigation or proceeding, or for otherwise opposing discriminatory or retaliatory actions or practices will not be tolerated. Retaliation by any DKCI worker is a violation of this policy. Individuals who believe they are the victim of discrimination or retaliation and those who suspect discrimination or



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retaliation should report the matter to their immediate supervisor, the head of their department or the Human Resources Department.

### 1.8.11 Employee Acknowledgement

The following shall be incorporated in the new hire training course or otherwise obtained from all workers:

DKCI believes our workers are the most important assets of our company. We are committed to assisting our injured worker's return to work as soon as medically appropriate and to work with the medical community to help the injured workers regain their livelihood.

The focus of Injury Management/Early Return to Work Program is to meet the needs of both DKCI and our injured workers by modifying the employee's existing position and/or work schedule.

For this program to be successful the injured worker must report all injuries to their supervisor or DKCI Safety on the same day of the incident. We will provide our injured workers with information about our Injury Management/Early Return to Work Program and other materials that can be presented to the treating medical provider so a temporary transitional duty assignment can be designed as soon as possible.

Thank you and please remember most injuries can be prevented.

I have read and understand the above.


Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

### 1.9 **Drug and Alcohol Policy**

DKCI strives to achieve a safe and healthful work environment for all workers of DKCI. This Drug and Alcohol Policy endeavours to prevent accidents and casualties in DKCI operations that result from impairment of workers who use alcohol or drugs or their use of alcohol or drugs. DKCI has determined that a uniform and effective drug policy be established.

It is also the objective of these policies to protect the well-being and property not only of DKCI workers, but also all other persons on DKCI premises, including visitors and guests. By the establishment of these policies, DKCI is seeking the protection of all property of DKCI and of its workers, from damage, loss, or theft.

All workers of DKCI must accept responsibility for their own safety and fitness to work and for the safety of others. This commitment encompasses conduct or behaviour off site or during non-working hours that may adversely affect their ability to work safely and reliably perform their duties during their shift. The policy is also being established to incorporate COAA Canadian Model for Providing a Safe Workplace - Alcohol and Drug Guidelines and Work Rules and the requirements of the client as per their local requirements.

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### Key Definitions

- **Alcohol** - means the intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohol's including methyl and isopropyl.
- **Beverage alcohol** - refers to beer, wine, and distilled spirits.
- **DKCI Business** - refers to all business activities undertaken during the DKCI's operations, whether conducted on or off DKCI premises. It includes those situations when an individual is on paid time and is representing or could reasonably be perceived as representing, the ESS (e.g. training on and off site, hosting clients or others, attending conferences or sales meetings, etc.)
- **DKCI Premises** - includes but is not necessarily restricted to, all land, property, structures, installations, vehicles, and equipment owned, leased, operated, or otherwise directly controlled by DKCI for the purpose of conducting DKCI business.
- **Contractor** - refers to any person or entity, including their workers, and sub-contractors that has been contracted or otherwise engaged to provide services to DKCI.
- **Drug** - Any chemical substance, including alcohol, that either produces physical, mental, or emotional change in the user, or one that can alter the mood, perception, or judgment of the individual consuming it. For this policy, drugs of concern are those that inhibit a worker's ability to perform his or her job safely.
- **Employees** - includes all regular full time, part time, seasonal, temporary, casual, or contracted workers.
- **Fitness for Work/Duty** - in the context of this policy means being able to safely and acceptably perform assigned duties without any limitations due to the effects of sleep deprivation, illness, medications (prescription or non-prescription), alcohol, street drugs, or stress.
- **Illicit drugs** - means any drug or substance which is not legally obtainable and whose use, sale, possession, purchase, or transfer is restricted or prohibited by law (e.g. street drugs such as marijuana and cocaine).
- **Medications** - refers to a drug obtained legally, either over the counter or through a doctor's prescription, or a herbal or homeopathic preparation.
- **Managers and Supervisors** - are individuals accountable for an area or shift, includes managers, foremen and others in supervisory positions, and have specific responsibilities around performance management under this policy.
- **Under the Influence** - For the purposes of this policy a worker is Under the Influence if a worker is affected by a drug, chemical substance or alcohol, or the combination of a drug, chemical substance, or alcohol in any detectable manner. The symptoms or influence are not confined to those consistent with misbehaviour, nor to obvious impairment of physical or mental ability, such as slurred speech or difficulty in maintaining balance. A determination of influence can be established by professional opinion, scientifically valid test and, as in case of alcohol, by a lay person's opinion

### Roles and Responsibilities

Workers must:

- understand the alcohol and drug policy and ensure they comply with the policy

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- remain fit to work at all times when schedule to be on call and take responsibility to ensure their own safety and the safety of others
- follow appropriate treatment if deemed necessary
- use medications responsibly, be aware of potential side effects and notify their supervisor of any potential unsafe side effects where applicable
- encourage their peers or co-workers to seek help when there is a potential breach or breach of policy.

Supervisors or leaders must:

- be knowledgeable about the DKCI's alcohol and drug policy and procedures
- ensure they comply with the standards as part of their responsibility to perform their work-related activities in an effective and safe manner
- be knowledgeable about the use of alcohol and drugs and be able to recognize the symptoms of the use of alcohol and drugs
- act on performance deviations
- act on reported or suspected alcohol or drug use by workers


Manager must:

- provide a safe workplace
- provide prevention programs that emphasize awareness, education, and training with respect to the use of alcohol and drugs
- ensure effective worker assistance services are available to workers
- assist workers in obtaining confidential assessment, counselling, referral, and rehabilitation services
- actively support and encourage rehabilitation activities and re-employment opportunities where applicable
- ensure completion of supervisory training and awareness in dealing with the use of alcohol and drugs in the workplace
- participate with unions, worker associations and employer organizations to assist in the provision of rehabilitating opportunities for persons who have problems with the use of alcohol and drugs
- ensure that all workers understand the existence of and content of the policy and procedures as part of the worker's orientation.
- ensure that the alcohol and drug testing is performed according to the standards set out in this document.

### Policy Statement

The use, abuse, reporting to work with detectable amounts in the system, bringing onto DKCI premises, DKCI property (as defined above), possession, transfer, storage, concealment, promotion or sale of the following substances and other items as listed below by workers of DKCI is strictly prohibited.

The possession of illegal drugs, unauthorized controlled substances, look-alikes, inhalants of abuse, designer and synthetic drugs, alcohol or intoxicating beverages (including the presence of any detectable amount in the worker's body while working), and any other drugs or substances which may affect a person's perception, performance,

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judgment, reactions or senses while working or while on DKCI business, including any and all drugs declared to be illegal under any Federal or State law is prohibited.

The possession or the reporting to work or working with detectable amounts in the system of alcoholic or intoxicating beverages on DKCI premises which may affect a worker's mood, senses, responses, motor functions, or alter or affect a person's perception, performance, judgment, reactions or senses while working or while on DKCI premises, the bringing onto DKCI premises (as defined above), or the possession, transfer, storage, concealment, transportation, promotion or sale of alcoholic or intoxicating beverages is prohibited.

The possession or the reporting to work or working with drug-related paraphernalia, including any material or equipment used or designed for use in testing, packaging, storing, injecting, ingesting, inhaling or otherwise introducing into the human body an illegal, unauthorized controlled or dangerous substance as defined by this policy is prohibited. The legal use of prescription drugs (Legally Controlled Substances) prescribed by a licensed physician are permitted, however:


- Employees will immediately inform their supervisor prior to using prescribed drugs or medication on the job.
- Medication will be in its original vial or be in a vial provided by the pharmacist commonly referred to as "day carriers" and will be in the worker's name and will have the doctor's name and the prescription number on the label, as well as the date of issuance.
- Each prescription will be not older than one (1) year of the date issued.
- Employees will only possess a reasonable amount of medication for a normal shift.
- The worker whose name appears on the label of the vial will not allow any other DKCI worker, visitor, guest, subcontractor, or any other person to consume the prescribed drug or medication.
- The worker will not consume the prescribed drug or medication more often than as prescribed by the worker's physician and as set out on the label of the vial.

### Prevention

This policy stresses the importance of prevention and early identification of potential problem situations. Employees will be provided with information on health and safety, recognizing related performance problems, and the process to access the DKCI Employee Assistance Program for assistance with an alcohol or drug problem, or any other personal problem that may be affecting work performance.

### Assessment Referral

Individuals who suspect they have a substance dependency or emerging alcohol, or drug problem are encouraged to seek advice and to follow appropriate treatment properly before performance is affected or violations of this policy occur. No one with an alcohol or drug problem will be disciplined for voluntarily requesting help in overcoming his or her problem. However, they are expected to access help prior to the initiation of disciplinary action under this policy. Employees taking prescription or non-prescription medication, which may cause drowsiness, dizziness, or

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other potential adverse side effects that could affect work, must notify their supervisor. The supervisor will involve the local occupational health staff in a "fit for duty" assessment. Supervisors, through performance management and in consultation with the local occupational health staff shall address any situation when a worker at works does not appear to be fit for duty.

### Treatment Rehabilitation


DKCI philosophy of treatment rehabilitation is if a worker who voluntarily seeks assistance will be referred to local DKCI representatives to seek treatment under their medical benefit plan. Where in the opinion of a qualified professional there is a risk an individual could not do their job safely, the individual will be removed from that job until management is confident, they are able to return to work safely.

When a worker is voluntarily undergoing treatment for a substance abuse problem, DKCI will ensure that they receive the time off that is required to participate in the program. If the worker who is undergoing rehabilitation needs to be placed in a treatment facility, DKCI will hold employment for the individual until they have successfully completed the rehabilitation process. Once management is fully confident that the worker has been rehabilitated, they can return to work. Employees should understand that DKCI reserves the right to inquire with the rehabilitation facility as to the progress with your treatment and as to your commitment to attendance.

Employees should understand that voluntarily accessing assistance does not eliminate the requirement for participation in an aftercare program, and maintenance of satisfactory performance levels. Disciplinary action under the policy cannot be avoided by a request for concealing or treatment, or by disclosure of that when individual is already involved in a treatment program.

### Fit for Duty Procedure

- Each supervisor is responsible for taking appropriate action when he/she has specific, objective, and documentable grounds to believe a worker is unfit for duty. Another supervisor may be called to the work location to assist in the investigation as outlined.
- In the interest of safety, the supervisor will ensure the worker is removed from the workplace immediately and escorted to a safe place.
- Supervisor will notify the worker representative, may request another supervisor to observe the worker, and may involve other health or safety personnel as required or appropriate.
- Should the worker request a fellow worker or representative to be present, the supervisor will comply.
- Supervisor will give the worker the opportunity to explain why he/she appears to be in a condition unfit for duty.
- Supervisor should attempt to ascertain the nature and severity of the problem and determine if it is a possible violation of this policy, however, the supervisor should not attempt to diagnose a potential health problem.
- After giving the worker the opportunity to explain his/her condition, and after consultation with a worker representative, if the supervisor still believes the worker is in a condition unfit for normal duty.

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- The worker should be referred to the appropriate emergency care center (i.e. hospital) or appropriate contracted treatment facilities for further medical attention if it appears to be a medical problem. The supervisor will involve the local occupational health staff in a "fit for duty" assessment.

### Impaired Driving Charge or Conviction

All individuals that operate any motor vehicle on behalf of DKCI will be required to maintain a valid driver's license. Any loss of license must be reported immediately, and the individual will no longer be qualified to drive on behalf of DKCI. In addition, any individual charged with an impaired driving offense (including but not restricted to blowing over the legal BAC in that jurisdiction, driving while impaired, or refusal to blow into a breath analyzer) when operating a vehicle on behalf of DKCI must inform their supervisor immediately.

Receipt of a charge will result in a full investigation, and a range of actions, which can include alternative work, assessment for a problem, or discipline up to and including dismissal depending on the circumstances. Failure to report the charge will normally be grounds for discipline up to termination of employment. A conviction for an impaired driving offense when driving on DKCI business or in an DKCI vehicle will normally be considered grounds for termination of employment. Each situation will be fully investigated, and action taken will depend on the circumstance surrounding the event.

### Alcohol and Drug Testing


As part of the recruitment process and established hiring standards, some of the sites in which we operate require that DKCI workers undergo drug and alcohol testing. As a result, DKCI will require that all workers have passed an alcohol and drug test within 90 calendar days before access to a site can be given. They will be advised in advance of the requirement to pass the test, and those that do not pass or refuse to participate may not be eligible for employment with DKCI. Drug and Alcohol Testing will be with an approved provider and will be in accordance with the COAA Canadian Model for Providing a Safe Workplace- Alcohol and Drug Guidelines and Work Rule.

Employees shall be unfit for duty if:

- They refuse to submit to a drug and alcohol test where reasonable cause exists or in a post-incident situation
- They cause any undue delay in submitting to a drug and alcohol test where reasonable cause exists or in a post-incident situation
- They tamper with or attempt to tamper with a drug and alcohol sample
- Both the screening and confirmation tests for alcohol (breathalyser) are equal to, or in excess of, 40 mg/100 ml (0.04%); a positive alcohol test or both the screening and confirmation levels for the specified drugs tested are detected at levels equal to or in excess of the limits set out in the COAA Model Rule.

### General Testing Requirements

A "reason for testing" checklist must be signed off by at least two management or supervisory personnel that have been trained in the Drug and Alcohol Awareness Program prior to reasonable cause or post incident drug and alcohol

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evaluations being undertaken. Management or supervision personnel must escort the worker to the testing facility after all communication and documentation is complete and signed off.

### Significant Incident Requirements

Investigation of all significant incidents will include the potential for drug and alcohol testing of any worker (includes contractors and subcontractors) including visitors directly or indirectly involved in the events forming part of the significant incident. A decision to proceed with drug or alcohol testing will be made as part of the incident management process where there is objective evidence that the use of alcohol and drugs cannot be ruled out in relation to the cause of the incident, after completion of a Drug and Alcohol Testing Post Incident Checklist.

### Reasonable Cause Testing

Drug and alcohol testing may be performed when there are reasonable grounds to believe that a worker or visitor may be under the influence of drugs and/or alcohol or be in possession of drugs and/or alcohol. The decision to test will be made using the Drug and Alcohol Testing Reasonable Cause Checklist completed and signed off by a minimum of two management or supervision personnel trained in a Drug and Alcohol Awareness Program.

### Approved Provider of Drug and Alcohol Testing

DKCI will locate a qualified occupational testing service as provider for drug and alcohol testing.


### Training

Management and supervisors shall receive drug and alcohol awareness training and training on this policy. Refresher training will occur every three years. Retraining of this policy must occur annually.

### Sample Provincial Legislation (Alberta)

Section 7, 8, 11.1 and 38.1 of Alberta's Human Rights, Citizenship and Multiculturalism Act read as follows:

- 7(1) No employer... shall refuse to employ or refuse to continue to employ any person or discriminate against any person with regards to employment or any term or condition of employment because of the physical disability of that person.
- 7(3) Subsection (1) does not apply with respect to a refusal, limitation, specification, or preference based on a bona fide occupational requirement.
- 8(1) No person shall use or circulate any form of application for employment or publish any advertisement in connection with employment or prospective employment or make any written or oral inquiry of an applicant that expresses either directly or indirectly any limitation, specification or preference indicating discrimination on the basis of physical disability of any person, or that requires an applicant to furnish any information concerning physical disability...
- 11.1 A contravention of this act shall be deemed not to have occurred if the person who is alleged to have contravened the Act shows that the alleged contravention was reasonable and justifiable in the circumstances.

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- 38(1) In this Act: "physical disability" means any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes epilepsy, paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, and physical reliance on a guide dog, wheelchair or other remedial application or device.

### Canadian Legislation

Section 10 of the Canadian Human Rights Act, R.S.C. 1985, c. H-6 reads as follows:

- It is a discriminatory practice for an employer ... or organization of employers to establish or purchase a policy or practice, or to enter into an agreement affecting recruitment, referral, hiring, promotion, training, apprenticeship, transfer or any other matter relating to employment or prospective employment, that deprives or tends to deprive an individual or class of individuals of any employment opportunities on a prohibited ground of discrimination.
- Section 3(1) and 25 of the Canadian Human Rights Act are in this form: 3(1) for all-purpose of this Act, race [and]...disability... are prohibited grounds of discrimination. 25 In this Act... disability means any previous or existing mental or physical disability and includes...previous or existing dependence on alcohol or a drug

Parts of section 15 of the Canadian Human Rights Act read as follows:

- 15 (1) It is not a discriminatory practice if any refusal, exclusion, expulsion, suspension, limitation, relation to any employment's established by an employer is based on a bona fide occupational requirement.
- 15 (2) For any practices mentioned in paragraph 1(a) to be considered to be based on a bona fide occupational requirement...it must be established that accommodation of the needs of an individual or a class of individuals affected would impose undue hardship on the person who would have to accommodate those needs, considering health, safety, and cost.
- 15 (8) This section applies in respect of a practice regardless of whether results in direct discrimination or adverse effect discrimination.
- Section 15(2) and (8) of the Canadian Human Rights Act was enacted in an Act to amend the Canada Evidence Act and the Criminal Code in respect of persons with disabilities, to amend the Canadian Human Rights Act in respect of persons with disabilities and other matters and to make consequential amendments to other Acts, S.C. 1998, c.9, s.10. It came into effect on June 30, 1998.


### Alcohol and Drug Testing Procedures

#### Alcohol Testing

##### General

- The donor is the person from whom a breath or saliva sample is collected. The donor is directed to go to a collection site to give a breath or saliva sample.



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- The breath alcohol technician (BAT) or the screening test technician (STT) as appropriate establishes the identity of the donor. Photo identification is required. The BAT or STT as appropriate explains the testing procedure to the donor.
- DKCI must securely store information about alcohol test results to ensure that disclosure to unauthorized persons does not occur. Breath testing and saliva testing devices are used to conduct alcohol screening tests.

### Breath Testing

- The BAT and the donor complete those parts of the alcohol testing form that are to be completed before the donor provides a breath sample. The BAT explains to the donor how to provide a breath sample and asks the donor to provide a breath sample. The BAT reads the test result and ensures that the test result is recorded on the alcohol testing form after showing the results to the donor.
- The BAT completes the part of the alcohol testing form that is to be completed after the donor provides a breath sample and asks the donor to do so as well.
- If the test result shows an alcohol level that is less than 0.020 grams/210 litres of breath, the BAT informs the donor that there is no need to conduct any further testing and reports the result in a confidential manner to DKCI's designated representative. While the initial communication need not be in writing, the BAT must subsequently provide a written report of the test result to DKCI's designated representative. If the test result shows an alcohol level that is equal to or greater than 0.020 grams/210 litres of breath, the BAT informs the donor of the need to conduct a confirmation test.

### Confirmation Test

- If a breath alcohol testing device was used for the screening test, an evidential breath alcohol device must be used to conduct the alcohol confirmation test. If a saliva testing device was used for the screening test, the confirmation test will use an evidential breath alcohol testing device.
- The BAT advises the donor not to eat, drink, put anything into his or her mouth or belch before the confirmation test is complete.
- The confirmation test must start not less than fifteen minutes after the completion of the screening test and not more than thirty minutes after the completion of the screening test.
- The BAT explains to the donor how to provide a breath sample and asks the donor to provide a breath sample.
- The BAT reads the test result on the device and shows the donor the result displayed. If the confirmation test result is equal to or more than 0.040 grams per 210 litres of breath, the BAT will do an external calibration check (accuracy check) to ensure the device is in working order. The BAT ensures that the test result is recorded on the alcohol testing form. The BAT verifies the printed results with the donor.
- The BAT completes the part of the alcohol testing form that is to be completed after the donor provides a breath sample and asks the donor to do so as well.

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- The BAT immediately reports in a confidential manner the test results to DKCI's designated representative. While the initial communication need not be in writing, the BAT must subsequently provide a written report of the test result to DKCI's designated representative.

### **Drug Testing**

- The donor is the person from whom a urine specimen is collected.
- The donor is directed to go to a collection site to give a urine specimen.
- The collection site person must establish the identity of the donor. Photo identification is preferable. Positive identification by a DKCI representative who holds a supervisory position is acceptable.
- The donor must remove coveralls, jacket, coat, hat, or any other outer clothing and leave these garments and any briefcase or purse with the collection site person.
- The donor must remove any items from his or her pockets and allow the collection site person to inspect them to determine that no items are present which could be used to adulterate a specimen.
- The donor must give up possession of any item which could be used to adulterate a specimen to the collection site person until the donor has completed the testing process.
- The collection site person may set a reasonable time limit for providing a urine specimen.
- The collection site person selects or allows the donor to select an individually wrapped or sealed specimen container. Either the collection site person or the donor, in the presence of the other, must unwrap or break the seal of the specimen container.
- The donor may provide his or her urine specimen in private, in most circumstances. The specimen must contain at least forty-five millilitres.
- The collection site person notes on the chain of form any unusual donor behaviour.
- The collection site person determines the volume and temperature of the urine in the specimen container.
- The collection site person inspects the specimen and notes on the chain of custody form any unusual findings.
- If the temperature of the specimen is outside the acceptable range or there is evidence that the specimen has been tampered with, the donor must provide another specimen under direct observation by the collection site person or another person if the collection site person is not the same gender as the donor.


### **1.10 Worker Rights and Responsibilities**

Workers within DKCI have the following three rights under OHS Legislation:

1. Right to Know what hazards and risks are associated with their positions
2. Right to Participate in the creation and amendments of this and other HSE programs in DKCI
3. Right to Refuse unsafe work

Workers shall:

- A worker has the right to refuse and must not carry out or cause to be carried out any work process or operate or cause to be operated any tool, appliance or equipment if the worker has reasonable cause to believe that to do so would create an undue hazard to the health and safety of any person.
- All workers shall follow all safety rules, policies, plans and procedures of DKCI and our clients.

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- Whenever a worker observes what appears to be an unsafe or harmful condition or act the worker must report it as soon as possible to a supervisor or to a member of DKCI management.
- A worker who refuses to carry out a work process or operate a tool, appliance or equipment must immediately report the circumstances of the unsafe condition to his or her supervisor or to a member of DKCI management.

### 1.11 Employer Rights and Responsibilities

- Ensure the workers understand their rights as it states in the Internal Responsibility System (IRS)
- Expect all workers to follow all safety rules, policies, plans and procedures of DKCI and our clients.
- To provide personal protective equipment in accordance with provisions within this safety management system.
- To conduct regular inspection of premises, equipment, work methods and work practices, at appropriate intervals, to ensure that prompt action is undertaken to correct any hazardous conditions found.
- To promptly investigate incidents to determine the action necessary to prevent their reoccurrence.
- To ensure that unsafe or harmful conditions found during any audit or inspection or being reported must be investigated and remedied without delay. Any DKCI supervisor or member of management receiving a report must immediately investigate the matter and ensure that any unsafe condition is remedied without delay, or if in his or her opinion the report is not valid, must so inform the person who made the report.
- In the event of an emergency action that is required to correct a condition which constitutes an immediate threat to workers only those qualified and properly instructed workers necessary to correct the unsafe condition may be exposed to the hazard, and every possible effort must be made to control the hazard.
- DKCI management shall meet periodically at a location determined by senior management to discuss health and safety activities and incident trends, and for the determination of necessary courses of action, resources needed or changes to our safety system.


### 1.12 Assignment of Responsibilities

All levels must be aware of their individual roles and responsibilities under both legislated and DKCI standards. Specific health and safety responsibilities are defined and documented within the Responsibilities section of each safety procedure. The responsibilities are also clearly communicated to workers through various means such as job descriptions, meetings, site specific HSE plans, training, etc.

Management expectations and the consequences of not adopting health and safety responsibilities are clearly communicated to all workers (see Disciplinary System).

Health and safety responsibilities are reviewed and revised through inspections, assessments, and management reviews.

The following are required health and safety responsibilities for the indicated position:

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### Managers


- Establish a health and safety policy
- Set health and safety goals and Objectives
- Set a standard of performance and receive information regularly
- Demonstrate a visible commitment to health and safety
- Communicate expectations for health and safety to workers
- Ensure operations are compliant with applicable legislation
- Provide adequate supervision and resources
- Ensure incidents are reported and investigated, and that corrective actions are taken
- Ensure inspections are conducted and corrective actions are taken where necessary
- Identify training needs and ensure proper training of workers
- Correct unsafe acts or conditions
- Enforce health and safety standards

### Supervisors

- Set a standard of performance and behaviour
- Demonstrate commitment to health and safety
- Communicate expectations for health and safety to workers
- Promote health and safety awareness
- Ensure training needs are identified and met
- Establish safe work procedures and practices
- Instruct workers in safe procedures and practices
- Hold regular team meetings
- Ensure proper maintenance of equipment, tools, and PPE
- Correct unsafe practices or conditions
- Conduct hazard assessments where required, and eliminate or reduce associated risks
- Ensure workers are aware of hazards and are trained to perform their job safely
- Enforce health and safety standards and positively reinforce good behaviour
- Conduct or participate in inspections
- Ensure incidents are reported and investigated, and that corrective actions are taken
- Comply with applicable legislation

### Workers

- Become familiar with the health and safety program
- Participate in the health and safety program and make suggestions for improvement
- Participate in all training offered by the employer
- Follow the employer's safety standards and comply with rules and legislation

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- Report any unsafe conditions or acts to their supervisor Immediately correct unsafe conditions, if safe to do so and where possible
- Refuse to perform work when unsafe conditions exist
- Report all incidents and near misses to their supervisor
- Use required protective and safety equipment
- Inspect tools, equipment, and vehicles before use
- Be familiar with the emergency response plan and location of first aid, firefighting, and communication equipment

#### Contractors, Subcontractors and Consultants

- Implement and follow an effective health and safety program, or follow the health and safety program of DKCI
- Conduct work safely by ensuring workers are competent to do so
- Be aware of and meet the operating DKCI's safety expectations
- Ensure work conducted complies with contractual agreements and regulatory requirements
- Provide the resources necessary to allow workers to complete their work safely

#### Visitors

- All visitors shall be properly identified and logged in.
- All visitors shall wear required PPE.
- Follow instructions of the supervisor or DKCI escort at all times
- Follow instructions of the supervisor or DKCI escort
- All visitors shall not be exposed to any hazard for which they do not have required training for
- All visitors shall log out upon departure.

### 1.13 Individual Health and Safety Performance Evaluation


All workers, including management, will have their individual health and safety performance evaluated. Criteria will include consideration of positive and negative behaviour. Examples include:

- Adherence to or violation of health and safety requirements.
- Participation in voluntary programs.
- Positive contributions to the safety management process.

Methods of evaluation include individual performance appraisal, disciplinary process, complimentary letters of appreciation, etc.

#### 1.13.1 Disciplinary Enforcement System

Management is committed to the safety excellence of its workers by providing an injury and incident free workplace. All workers are to abide by the regulations, safety rules and the use of safe work practices and procedures. Safety

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violations will be handled in an objective but firm manner. The enforcement progression follows the steps outlined below with documentation at each stage:

- Verbal Warning
- Written Warning
- Dismissal

Violation of any of the below rules will not be tolerated on the job and are additional grounds for immediate discipline up to and including dismissal:

- Consuming or being in possession of alcohol or illegal drugs on DKCI premises, or on any DKCI jobsite, is prohibited.
- Fighting, horseplay, practical jokes or otherwise interfering with other workers is prohibited.
- Performing theft, vandalism or any other abuse or misuse of DKCI property.
- Not reporting all incidents that result in or could create danger or injury to a supervisor immediately.
- Not providing first aid treatment promptly for any injury.
- Not wearing hard hats, safety boots or other required PPE at all times on all jobsites.
- Not carrying out work in accordance with appropriate safe work practices and the supervisor's direction.
- Not using tools that are in good repair, with all guards and safety devices in place.
- Not keeping the work area neat, clean, and orderly.
- Attempting or using physical force to cause injury, threatening statements or other actions to cause a worker to feel they are at risk of injury.

### 1.13.2 Impairment Policy


DKCI has a ZERO tolerance and prohibits any worker from possessing or being under the influence from alcohol, drugs, and other substances at any DKCI work location. No worker is allowed by DKCI to be on, remain or enter DKCI facilities while their ability to work is affected by alcohol, a drug or other substance so as to endanger themselves or anyone else.

### 1.14 Senior Operating Officer Communication

No less than once a year the senior operating officer shall communicate to all workers about the commitment to health safety by DKCI. This communication will be in writing and can be accomplished by bulletin board posting, pay cheque inserts, etc. A copy of the annual communication is to be provided to Safety for compliance documentation.

### 1.15 Senior Manager Tours

Senior managers from all levels shall tour the facility they manage no less than every six months to reinforce health and safety practices and behaviours. The tours can be concurrent with other business purposes. There is no documentation required but it is suggested that completed tour dates and findings be provided to the Safety for compliance documentation.

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### 1.16 Availability of Safety Legislation

Copies of current occupational health and safety legislation (federal, provincial, and municipal) appropriate to the operation of the work site(s) will be present on site. Employees are to have access. Examples include:

- Regulatory statutes applicable to the jurisdiction of the work site
- Hazard or industry specific statutes and regulations
- Municipal laws/regulations/by-laws
- Collective Agreements if applicable
- Client requirements

### 1.17 Contractor Health and Safety Requirements


- Contractors shall implement and follow an effective health and safety program, or follow the HSMS of DKCI;
- Conduct work safely by ensuring workers are competent to do so;
- Be aware of and meet the client's safety requirements;
- Ensure work conducted complies with contractual agreements and regulatory requirements, and
- Provide the resources necessary to allow workers to complete their work safely.

### 1.18 Visitor Health and Safety

- All visitors shall be properly identified and logged in.
- All visitors shall wear required PPE.
- Follow instructions of the supervisor or DKCI escort at all times.
- Follow instructions of the supervisor or DKCI escort.
- All visitors shall not be exposed to any hazard for which they do not have required training for.
- All visitors shall log out upon departure.

### 1.19 Resource Availability

Senior management of DKCI shall provide appropriate financial, human, and organizational resources (proper staffing, equipment, training materials and funds) to plan, implement, check, review and correct the HSMS.

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## 2.0 HAZARD IDENTIFICATION & CONTROL

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### Objectives

- To identify, assess and document health and safety risks in the workplace for routine and non-routine activities while ensuring workers are involved during the processes;
- To eliminate, as far as is practicable, the risk of human injury, illness or damage to property;
- To promote planning as a means of achieving continuous improvement in our health and safety performance by utilizing risk management procedures when establishing our annual health and safety Objectives.

Additional benefits of hazard identification and assessment:

- Training and Orientation: We use hazard assessment data to determine what worker training needs to be done, and to build the content of worker orientations and job-specific training.
- Work Site Inspections: We use hazard assessment data as the basis for inspection checklists.
- Emergency Response: We use hazard assessments to help pinpoint areas that will require Emergency Response Plans.
- Incident Investigations: We determine if a system failure was the cause of an incident.

### Assignment of Responsibilities

#### ESS Safety

- Introduces hazard identification and assessment procedures and assists site managers with implementation;
- Determines risk levels for identified hazards and continually reviews legal and other requirements;
- Utilizes risk management procedure results when establishing ESS annual health and safety objectives;
- Maintains all documentation related to hazard identification and assessment; and
- Provides training for key workers in the process of hazard identification and assessment.

#### Manager & Supervisors

- Implements hazard identification and assessment procedures and ensure workers are involved.
- Supplies Safety copies of all documents generated related to hazard identification and assessment.

#### Employees


- Provide input to risk identification and assessment procedures.

### 2.1 Hazard Identification

Occupational hazards are divided into two categories:

- Health Hazards: A health hazard may produce serious and immediate (acute) health effects or cause long-term (chronic) health problems. All or part of the body may be affected. Someone with an occupational



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illness may not recognize the symptoms immediately. For example, noise-induced hearing loss is often not noticed until it is well advanced.

- Safety Hazards: A safety hazard is anything that could endanger the immediate safety of a worker, for example, a pinch point, crush, or burn hazard.

### 2.1.1 Hazard Categories

Both health and safety hazards can be classified into the following categories:

- Physical hazards, including lifting, repetitive motions, slipping, machinery, working at heights, loud noise, extreme temperatures, etc.
- Chemical Hazards, including exposure to chemicals, dusts, fumes, mists and vapours.
- Biological Hazards, including exposure to viruses, fungi, bacteria, moulds, body fluids, and sewage.
- Psychological Hazards, including violence, stress and fatigue.

### 2.1.2 Sources of Hazards

The three most likely sources that should be considered are:

- People: Lack of training, poor communication, rushing, fatigue and other factors may cause at-risk behaviours.
- Equipment and Materials: Some equipment, tools and materials used in the job process are inherently hazardous, and others become hazardous over time due to inadequate maintenance, storage, or disposal.
- Workplace Environment: Factors such as facility layout, ventilation and lighting, walking surfaces, temperature and other variables can all be sources of hazards.

## 2.2 Hazard Assessment


There are two levels of hazard assessment:

- Formal hazard assessment is the formal internal process for routine work and an important step in developing the DKCI Health and Safety Management System.
- Field-level hazard assessment is performed on the spot when unusual hazards may be introduced into the worker's work.

### 2.2.1 Formal Hazard Assessment

Formal hazard assessments will serve as the foundation of the DKCI HSMS and involve the identification of all jobs and tasks performed by workers, the assessment of each task for hazards and the prioritization of the hazards based on the level of risk. This process will be followed by the implementation of controls for the identified hazards.

Key workers charged with conducting hazard assessments shall receive training in how best to complete the process. The following are the steps for conducting a Formal Hazard Assessment

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### Formal Hazard Assessment Task Inventory

1. Determine the positions associated with the organization
2. Create a list of all jobs within the scope of DKCI. Additional areas for jobs and tasks identification include:
  - Activities of all persons having access to the workplace including contractors and visitors.
  - Ergonomic assessments
  - Industrial hygiene surveys
  - Workplace Inspections
  - Purchasing and procuring
  - Document review
  - Accident/incident investigations
  - It is also necessary to consider future tasks or situations that involve a change to the existing premises or process, or those which are non-routine.
3. List all the tasks performed as part of each job identified.
4. From the Formal Hazard Assessment Worksheet document the pre-control and post-control risk assessment. Risk Assessments are conducted using the DKCI Risk Matrix. The highest risk from the FHA Worksheet will be indicated on the inventory.


### Job Hazard Assessment (JHA) Worksheet

1. Identify Hazards
  - Each inventoried task is assessed to determine the potential hazards and associated risk. For each task listed, DKCI will identify any health or safety hazards to which workers may be exposed. DKCI will involve workers who perform the tasks in this process to ensure nothing is overlooked.
2. Determine the Hazard Category – Safety or Health Hazard
3. After the hazards are identified, risk ratings are calculated using the DKCI Risk Matrix
4. Determine Controls
  - DKCI addresses identified hazards by assigning methods of control to eliminate or reduce the hazard (hierarchy of controls). The most effective controls can be determined based on legal requirements, manufacturers' specifications, DKCI rules, industry best practices and worker input. DKCI records the control methods, the date of implementation, and the names of those who participated in the assessment and control process. DKCI will follow up with periodic reviews to ensure the control measures are working and effective. See (Hazard Control).

### Review Hazard Assessments

Formal hazard assessments are dated and subject to review schedule to prevent the development of conditions that may put workers at risk. These reviews will be conducted:

1. when new operations, work processes, equipment, materials or products are introduced

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2. when operations work-related processes or equipment are modified
3. when site-specific hazard assessments, inspections, or investigations identify a previously unrecognized hazard
4. as per a pre-determined frequency – annually (at a minimum) or any time a new process is introduced

### 2.2.2 Field-Level Hazard Assessment


A field-level hazard assessment (*see Field Hazard Assessment Form*) is to be performed at the job site when hazards not considered in the formal hazard assessment could be introduced. All workers at the job site must participate in a field-level assessment with their supervisor. The field-level hazard assessment is to be conducted before work begins and repeated at reasonable intervals if a new work process is introduced, a process or operation changes or before the construction of significant additions or alterations. The steps involved are as follows:

- Before starting work on a new job site, or under unfamiliar conditions, worker(s) must stop to identify any hazards that may have been introduced into their usual work.
- Any existing hazards are identified and assessed on the spot and controls are put in place immediately to eliminate or reduce the risk to a reasonable level before work begins
- In many cases, a field-level hazard assessment will identify hazards that have already been identified and assessed through the formal hazard assessment process, since the formal process should have identified all hazards that workers would normally encounter in the course of their work. If this happens, the worker would be directed to a pre-determined method of hazard control. If a new and unusual hazard specific to the job or job site is identified a new control method may have to be identified and implemented before work can begin.
- When a new control method is required for a new or unusual hazard, that hazard must be reported to the supervisor. DKCI can then prioritize the hazard and determine if further preventative action needs to be conducted by the DKCI (such as revision of training, procedures, and awareness bulletins).

Field level risk assessment forms will be maintained at the work site and a copy submitted to Safety for documentation purposes.

### 2.2.3 Reporting Hazards

- Employees shall not perform any work they feel is unsafe. Each worker is required to immediately report any unsafe condition or act to their immediate supervisor. Any worker may report hazardous work conditions without fear of reprisal.
- All workers have a responsibility for reporting hazardous work conditions, practices, or acts that are encountered on the job site. This can be done using the Hazard Observation form and submitted to the supervisor for any outstanding actions.
- Employees shall immediately report before reporting for work, and any non-work injuries or prescriptions that could affect their ability to safely perform their normal job.

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- Additional methods for reporting hazardous conditions include use of the safety suggestion box, notifying their supervisor or any management representative, DKCI safety meetings or Health and Safety Representative (HSR) involvement, use of client hazard reporting methods.
- Suggestions or ideas received will be addressed in a timely manner.

### 2.3 Management of Change (MOC)


Refer to DKCI Management of Change Program. An appropriate review shall occur before process and structural changes are made to DKCI facilities, processes and equipment. A thorough review of the change should improve the operability and reliability of the change, control the introduction of hazards into the workplace, improve decision-making through collaboration, promote effective communications and teamwork, and ensure conformance with policy, standards, codes and regulations as they apply to DKCI operations. General requirements include:

- Prior to any change within the scope of this policy, a safety review is to be completed using the form Management of Change Procedure Form.
- It is the responsibility of the individual or team proposing the change to follow this procedure and complete the safety review prior to making any changes.
- Once the review has been completed by the individual or team, it must be approved by the Supervisor, as well as senior overseeing DKCI manager and Safety.
- At the completion of the change, the Supervisor and Safety shall audit the changes against the approved plan.

#### Procedure

Describe in detail all proposed changes to the following areas on the Management of Change Procedure Form. Examples include:

- Utility and Energy Requirements: electrical, hydraulic, compressed air, steam, etc., piping pressures and sizes for liquid and gas supplies, all means for de-energizing utilities provided and identified.
- Hazardous Materials: names and descriptions, MSDSs, concentrations, size and type of packaging, flash point, flammable limits, storage requirements, temperatures, etc.
- Waste Disposal: waste generated, containers to be used and locations, amounts, flammability, toxicity, reactivity, ingredients, associated wastes such as gloves and rags, disposal locations, etc.
- Personal Protective Equipment: types required for hazards present or anticipated.
- Personnel: types of training required for hazard communication, waste disposal, PPE, work permits, confined space, moving vehicles, cranes, fire protection, lockout/tagout, new equipment, shifts to be involved, use of temporary workers, qualifications of operators, testing of operators.
- Material Handling: lifting devices required, cranes required, weights to be handled mechanically and manually, forklift requirements, rack storage requirements, access to racks by forklifts, power requirements for lifting aids.

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- Fire Protection: access to existing fire extinguishers and fire hoses, sprinklers protected and not obstructed, emergency response procedures.
- Walking Surfaces: Access to aisles, aisles not used for working, aisles designated, clean and smooth surfaces, floor mats, trip hazards.
- Machinery and Equipment: guarding requirements, power transmission guarding, nip points, sharp edges, foot treadles, energy sources, new equipment and tools, maintenance requirements, equipment bolted to the floor, energy isolating requirements (lockout/tagout), special tools required, automatic start or intermittent operations.
- Ergonomics: illumination, noise, worker position and posture, vibration, floor space, machine controls, repetition, force, tool use, heat and cold, emergency stop location.
- Ventilation: airborne contaminants (vapour, gas, dusts, fumes, mists, smoke, vehicle exhaust, etc.), control, methods, amounts of emissions, local and general (dilution) ventilation, CFM, permits required.
- Radiation Sources: ultra-violet radiation from arc welding, laser, light energy from cutting, plasma, microwave, radio frequency, etc.

## 2.4 Risk Assessment

### Objectives

- Hazards are classified and ranked according to risk;
- DKCI has established a formal system for classifying and ranking hazards according to risk. Risk may be determined by analyzing the probability of the hazard causing harm, the frequency the hazard is encountered, and the potential consequences of impact with the hazard.


### Assignment of Responsibilities

DKCI Safety, site supervisors and workers as identified specific reference procedures and safety programs.

#### 2.4.1 DKCI Risk Assessment Matrix

A risk matrix has been developed to assist employees with risk assessment. Following risk assessment steps each risk assessed becomes classified as low, medium or high in accordance with the DKCI Risk Assessment Matrix shown below.

The risk level of the hazard is recorded with the associated work task within the site specific HSE plan for the job site.

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### DKCI Risk Matrix

CONSEQUENCE					FREQUENCY				
Severity	People	Assets	Environment	Reputation	A	B	C	D	E
					Not Done	Rarely	Once a week	Several Times in a Week	Multiple Times in a Day
1	Slight health effect	Slight damage	Slight effect	Slight impact	1A	1B	1C	1D	1E
2	Minor health effect	Minor damage	Minor effect	Limited impact	2A	2B	2C	2D	2E
3	Major health effect	Localized damage	Localized effect	Considerable impact	3A	3B	3C	3D	3E
4	Single fatality	Major damage	Major effect	National impact	4A	4B	4C	4D	4E
5	Multiple fatalities	Extensive damage	Massive effect	Global impact	5A	5B	5C	5E	5E

Key	Manage for continuous improvement (Low)	Incorporate risk reduction measures (Medium)	Intolerable (High)
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## 2.5 Hazard & Risk Control

### Objectives

- To provide guidelines to control identified and assessed risks;
- To emphasize the importance of understanding the hierarchy of controls for the effective elimination of identified risks within our workplaces.


### Assignment of Responsibilities

DKCI Safety, site supervisors and workers as identified specific reference procedures and safety programs.

## 2.6 Hierarchy of Controls

Engineering controls should always be the first option by DKCI to reduce or eliminate risk. Examples include:

- Building a catwalk with handrails and replacing a portable ladder with a permanent access ladder for maintenance procedures;
- Building a sound-dampening enclosure around a piece of loud equipment to reduce workers' noise exposure; or

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- Replacing a harmful chemical with a less hazardous product

Administrative controls are the second most effective method of hazard control and involve the implementation of ESS practices, procedures and rules to reduce the amount of exposure a worker has to the danger. Examples include:

- Developing and enforcing the use of practices and procedures for conducting a task safely;
- Providing emergency response training to all workers and conducting regular drills;
- Job rotation; and
- Posting signs to warn of high noise areas.

Personal Protective Equipment (PPE) is the method of last resort and should always be used in combination with other control methods. Personal protective equipment is often the easiest control to implement, but is usually the least effective. Examples of Personal Protective Equipment include:

- Safety glasses to protect the eyes from flying debris;
- Hard hats to protect the head from falling objects; or
- Respiratory protective equipment to protect the lungs from harmful dusts and chemical vapours

## 2.7 Developing Controls

Risk assessed hazards are compiled with risk control methods including engineering, administrative controls and/or PPE required into the Critical Task Worksheet for each work location. No work will begin before the work location hazard and risk assessment is completed for new locations or where changes have been made to existing work locations where new processes could cause risk.


### 2.7.1 Develop Hazard Controls

Using the results of the hazard assessment DKCI will determine possible controls for the identified hazards. DKCI desires to solicit input from the workers. Their knowledge of the job tasks can be of great value to the process, and their involvement will help gain worker buy-in. Other sources of information about possible controls will include codes and standards, health and safety legislation, and existing DKCI policies.

### 2.7.2 Implementation of Controls

Implementation involves the installation of engineering controls, the development of policies, procedures, codes of practice, rules and preventative maintenance schedules and the introduction of PPE. Implementation will also involve training workers and contractors in the use of controls and the introduction of policies to enforce their use.

Only those workers competent in correcting emergency controls of hazards may be exposed to the hazard and only the minimum number of competent workers may be exposed during hazard emergency control. An example is a gas leak in a building. Only those competent personnel with training on fire safety, gas supply shut off and other related controls will attempt to resolve the emergency control of a hazard. DKCI will make every possible effort to control the hazard or under the supervision of client emergency response personnel in every emergency.

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Minimum Required Controls for DKCI:

**Systems to Control Access or Exiting Customer's Premises**

- All vehicles will be properly insured and equipped with all client vehicle required safety equipment.
- All staff will have proper client required training and identification prior to entering a client location.
- All staff will log in and log out per client requirements.

**Background Checks Prior to Issuing Identification Cards**

- All individuals shall provide proof of identity prior to being issued a badge or access to DKCI or client property. The proof must be issued by a governmental agency and have a photo (driver's license, passport, etc.)
- All visitors shall log in and out of our or client facilities.
- Further background investigation may be required based on the sensitivity of the worker's position.

**DKCI Employee Identification System**

- All workers shall be issued an ISNetworld identification badge (or other suitable method) with photo included. Temporary badges can be downloaded from ISNetworld prior to the final badge arriving. Employees are required to carry at least the ISNetworld badge (or other suitable method) in addition to any client or DKCI issued identification badge.

**Hazardous Materials**

- No WHMIS controlled products or materials will be allowed to be used unless there is a valid Safety Data Sheet available on-site and there is a supplier or workplace label on the container for any controlled product that is produced, manufactured or used at a DKCI site.
- DKCI will ensure the SDS is obtained from the supplier when receiving a controlled product on each job site.
- DKCI will ensure that SDS are filed at the work site where they will be readily accessible to workers. SDS must be updated every three years.
- DKCI will ensure that SDS are available and posted near the work site where controlled products are used.
- Managers will ensure that workers are notified if a controlled product is to be used in an open area or where fumes may migrate.
- A Controlled Product Inventory List and Safety Data Sheets shall be kept at a main location and will be made available to workers for review.
- Any work site generated waste classified as hazardous shall be stored and handled safely and properly using a combination of any and all means of identification and instruction of workers on the safe handling of the hazardous waste.


**Control of Hazardous Materials for Client Locations**

- No hazardous material will be brought onto client property unless all client approval processes have been met. This may involve a needs analysis review and SDS submittal and approval. All client procedures must be followed.

**Fatigue Management**

The guiding principles of fatigue management shall be incorporated into the normal management functions of the business and include the following:



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- Employees must be in a fit state to undertake work
- Employees must be fit to complete work
- Employees must take minimum periods of rest to safely perform their work

The following work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and to increase mental fitness. If local legislated requirements are higher they shall be followed.

1. Every Employee shall have necessary work breaks in order to avoid fatigue. These scheduled breaks will apply to both driving and on site hours. The following shall be a minimum (or reflect local legislated requirements):
  - 15 Minutes each 2.5 hours
  - 30 Minutes after 5 Hours
  - 30 Minutes after 10 Hours
2. No Workers shall work more than:
  - 12 hours per day
  - 24 Days Continuous
3. Unfamiliar or irregular work should be avoided.

DKCI will provide equipment such as anti-fatigue mats for standing, lift assist devices for repetitive lifting and other ergonomic devices as deemed appropriate, chairs for workers to sit periodically and will provide periodic rest breaks for personnel. DKCI will also periodically evaluate and improve work tasks to control fatigue.

### General Safety Standards and Guidelines


The below applies to all DKCI work sites. Additional work practices are contained in DKCI safety programs associated with this health and safety management system.

#### Housekeeping

- DKCI is responsible for making sure that the work site, and in particular entry and exit routes at a work site, are free of waste, materials and equipment.
- Obstructed entry and exit routes can pose a serious hazard to workers having to leave a work site quickly, as might be required during an emergency and shall be kept clear at all times.
- Obstructions may reduce visibility at a work site and may also present a tripping hazard and shall be removed as observed.

#### Lighting

- DKCI is responsible for ensuring adequate lighting is available for tasks requiring the ability to distinguish detail, such as an electrician working on live circuits at a panel board or a sewing machine operator stitching a product.
- DKCI is responsible for protecting light sources above a working or walking surface against damage.

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- Emergency lighting must be available if workers are in danger if the normal lighting system fails. Natural daytime lighting cannot be relied upon as a dependable source of emergency lighting.
- DKCI is responsible for ensuring that an emergency lighting system provides sufficient light to allow workers to safely leave the work site, start any necessary emergency shutdown procedures or restore normal lighting.

#### **Pallets and Storage Racks**

- All goods, materials and equipment at work sites must be stacked, stored, and secured in such a way that they do not flow, move, roll or collapse. Employees responsible for stacking, storing, or securing goods, materials, and equipment must be trained in the safe methods for doing so.
- Stacks, shelving and other fixtures for holding or storing materials shall be laid out and designed so that there is sufficient access for safe loading and unloading.
- Storage areas shall be specifically designated and be clearly marked. Aisles should be wide enough for the type of storage, and be kept free of obstacles and waste materials.
- Suitable racks will be provided for materials capable of rolling such as steel tubes, bars and piping. Large diameter tubes or pipes can be stored on their sides as drums might be stored.
- Wedges, chocks, stakes or other means shall be used to restrain the bottom tier of round objects that are stacked or tiered and that could cause the stack to collapse by rolling or moving.
- Racks, shelving, fixtures, etc. shall be regularly inspected for damage and other defects that might cause loss of strength or result in injury or damage.
- Employees must report to their employer any damage to storage racks as soon as is practical.

#### **Securing Equipment and Materials**


- Bags, containers, bundles, etc. stored in tiers must be stacked, blocked, interlocked and limited in height to prevent sliding or collapse.
- Loads must be secured by tie-downs, bulkheads, or blocking. Rolling equipment, when parked, shall have wheels chocked to prevent unintentional movement.

#### **Apparel**

- Apparel should be kept clean and worn as intended – done up properly around the body with no loose or dangling parts, and worn in a way that ensures that no other clothing or equipment obscures the high visibility materials.

#### **Facility Equipment and Working Conditions**

- Damaged and faulty equipment reporting procedures must be in place.
- No DKCI worker is allowed service vehicle tires or wheel assemblies. This work shall only be performed by a qualified contractor.
- No equipment shall be operated unless the worker has received proper training by the supervisor.
- Tools and equipment damaged during use must be replaced or repaired only by a qualified person or DKCI.
- Areas not intended to be accessible to workers shall be secured by locked doors or equivalent means of security, and shall not be entered unless safe work procedures are developed and followed. All controlled areas are to have proper signage warning workers not to enter.

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- Floors, platforms, ramps, stairs and all walking surfaces for workers must be maintained in a state of safe repair and kept free of slipping and tripping hazards. If such areas are taken out of service DKCI will take reasonable means for preventing entry or use.
- DKCI shall ensure that work site traffic is controlled to protect our workers. This will be accomplished through engineering controls or administrative controls either by DKCI or via our customers if they maintain control of the traffic on the work site. Each work site must have a designated safe way of entering and exiting. Employees on foot and exposed to the hazards of moving vehicles are required to wear highly visible apparel that is clearly distinguishable.
- DKCI will ensure all equipment is maintained, safe to perform adequate strength for its purpose and free from obvious defects. As with our statement that if it isn't safe doesn't do it – this also applies to equipment; if it isn't safe don't use it. Any equipment being found to be defective or in need of repair shall be tagged out, isolated from service by being turned into a worker's direct supervisor and not used until repaired by a qualified repair person.

#### **Lifting and Handling Loads**

- No worker will manually lift, lower, push, pull, carry, handle or transports a load that could injure them. All workers shall receive ergonomic training addressed in the MSD procedure in this safety management system.
- DKCI has a responsibility to provide, where reasonably practicable, appropriate equipment for lifting, lowering, pushing, pulling, carrying, handling or transporting heavy or awkward loads.
- Within each work site's site specific safety plan is a hazard assessment that all workers receive. Included within that document that all workers receive and are tested on is an area addressing how to handle heavy and awkward loads to minimize manual handling by the worker. Examples include: not lifting over a set amount, being required to ask for help, being required to utilize mechanical means for lifting and transport, etc.
- Material and equipment must be placed, stacked or stored in a stable and secure manner. Stacked material or containers must be stabilized as necessary by interlocking, strapping or other effective means of restraint to protect the safety of workers.
- An area in which material may be dropped, dumped or spilled must be guarded to prevent inadvertent entry by workers, or protected by adequate covers and guarding.

#### **Driving Safety**

- Operators of ESS or client on or off road vehicles shall be qualified by possession of a valid, current driver's license for the type of vehicle being driven.
- No passengers shall be on trucks used to deliver goods.
- Drivers shall have 3 years of driving experience on the vehicle he/she is licensed to drive and regularly drives.
- Backing is prohibited whenever practicable. Where backing is required, drivers, when parking, should make every effort to park the vehicle in a manner that allows the first move when leaving the parking space to be forward.
- Drivers must have either a reversing alarm, use a spotter or walk around the truck/trailer prior to backing.

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- Passenger compartments are to be free from loose objects that might endanger passengers in the event of an incident. Any vehicle with non-segregated storage shall be equipped with a cargo net or equivalent to separate the storage area.
- Vehicles (light vehicles, heavy vehicles and trailers) may not be modified without the endorsement of the manufacturer.
- Signs, stickers or labels are to be fitted in such a manner that they do not obstruct the driver's vision or impede the driver's use of any controls.

**Employees driving vehicles are required to:**


- Obey all local and provincial driving laws or regulations as well as requirements of clients;
- Immediately report any citation, warning, vehicle damage or near miss associated with DKCI or client vehicle operation to the supervisor;
- Immediately report any restriction or change to their driving privileges to the supervisor.
- Seat belts shall always be worn by all occupants during the operation of any vehicle; only seats fitted with three-point inertia-reel type seatbelts are used. All vehicles capable of more than 10 mph/15 kph shall have seat belts installed.
- Defensive drivers continually assess conditions and hazards and remain prepared for any challenge that may approach them;
- When speaking with a passenger, always keep your eyes on the road;
- Both hands on the wheel;
- No use of cell phones, radios or other electronic devices while driving any vehicle - vehicle must be safely parked prior to using a mobile phone or 2-way radio.
- Slow down around construction, large vehicles, wildlife, fog, rain, snow, or anything else that adds a hazard to your driving;
- Drive for conditions, not just the speed limit;
- Alcohol or illegal drugs are not allowed to be in a DKCI, client or leased vehicle at any time;

**Drivers are to be prepared before leaving:**


- Perform 360 walk around – report new damage;
- Check windshield for cracks that could interfere with vision;
- Inspect for vehicle damage and immediately report any damage to the supervisor if not previously observed;
- Make sure dirt or snow is removed from lights on all sides of the vehicle;
- Brush or clean off snow or ice on all windows to ensure complete vision;
- Check fuel level to be certain the destination can be reached;
- Check to ensure the license plates and inspection tag on vehicle are current;
- Ensure that there is a first aid kit and inspected fire extinguisher in the ESS vehicle;
- Ensure driver is rested and alert for driving;
- Employees are not to perform repairs or maintenance other than routine fluid additions.

**Vehicle Requirements**

- All DKCI vehicles shall be outfitted with an adjustable steering column.

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- All DKCI vehicles shall be outfitted with an independently adjustable driver's seat (at a minimum, moveable forward and rearward).
- All DKCI vehicles will be outfitted with a functional air conditioning/heating system that is able to maintain an in-cab temperature range of 5°C/41°F to 30°C/86°F under all local climatic and driving conditions and the air conditioning unit will use a non ozone-depleting refrigerant.
- All drivers of light vehicles shall carry a high visibility jacket for use in case of emergency stops.
- All instrumentation will be in the local unit of measurement (e.g. speedometer, fuel gauge).
- All light duty vehicles (including buses) are to be equipped with an adjustable left, right and central rear view mirrors
- All light duty vehicles carry a minimum of one collapsible hazard warning triangle.
- All light equipment vehicles shall be outfitted with two red high-intensity lights located as high, as far apart, and as far back as practical, wired to the headlight switch, but also with an override switch, if permitted by local regulations.
- All light vehicles registered after July 1, 2006 will be equipped with Anti-Lock Braking Systems (ABS).
- All light vehicles shall be equipped with a securely stowed first aid kit.
- All seats are to be fitted with headrests. Where practical all DKCI vehicles will be outfitted with a radio, cassette or cd player (or equivalent) to help reduce driver fatigue.
- All vehicle door locking systems will be equipped with an override in order that occupants can open the doors after the vehicle has been locked externally.
- All vehicles are to be equipped with a multipurpose fire extinguisher with a capacity of at least 0.9 kg/2 lb. The fire extinguisher shall be securely mounted on a bracket and located so that it is easily accessible in an emergency without becoming a hazard in case of an incident.
- All vehicles shall have a mobile phone, 2-way radio, or other such communication device that allows communication with emergency response personnel or DKCI managers.
- All vehicles will be outfitted with an adjustable steering column and the vehicle steering wheel will be located on the left hand side of the vehicle.
- Any vehicle with non-segregated storage shall be equipped with a cargo net or equivalent to separate the storage area.
- Driver shall ensure that passenger compartments are free from loose objects that might endanger passengers in the event of an incident.
- Drivers are prohibited from backing whenever practicable.
- Drivers must have a reversing alarm, use a spotter or walk around the truck/trailer prior to backing.
- Drivers shall have 3 years of driving experience on the vehicle he/she is licensed to drive & regularly drives. All vehicles will be equipped with a mobile phone, 2-way radio, or other such communication device that allows communication with emergency response personnel or DKCI managers.
- No passengers are allowed on trucks used to deliver goods.
- No vehicle less than 1000 kg is to be used on public roads. All DKCI vehicles (light, heavy and trailers) shall be suitable for operation in local climate conditions

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- Only seats fitted with three-pointed inertia-reel type seatbelts shall be used.
- Rollover protection will be installed in any vehicle to address high risk environments. The rollover protection engineered will conform to recognized regulatory standard and industry preferred practices.
- Tire type and pattern is to be recommended by the vehicle or tire manufacturer for use on the vehicle in the area of operation.
- Tires are to be radial with a minimum tread depth of 1.6mm [1/16 inch], 2.0mm across 75% of the tire width and tread-pattern visible across 100% of the tire.
- Tires, including spares if full size, are to be of same type, profile and tread pattern, except when the vehicle or tire manufacturer recommends a different type for certain axles.
- Vehicles (light vehicles, heavy vehicles and trailers) may not be modified without the endorsement of the manufacturer.
- Vehicles are to be fitted with a spare wheel and changing equipment to safely change a wheel, or a suitable alternative.
- Vehicles longer than 6 meters/20 feet or with restricted rear view (i.e. pickup trucks that are fully loaded) are to be fitted with an audible reversing alarm.
- Vehicles must be safety parked prior to using a mobile phone or 2-way radio.
- Vehicles shall be outfitted with an independently adjustable driver's seat (at a minimum, moveable forward and rearward).
- Where backing is required, drivers, when parking, should make every effort to park the vehicle in a manner that allows the first move when leaving the parking space to be forward.

#### PPE


- The use and care of personal protective equipment is the responsibility of the worker. DKCI provides basic safety equipment such as safety glasses; gloves and other as-required PPE.
- PPE must be inspected by the worker for defects prior to each use. Where defective or damaged PPE is found during inspection, it is disposed of. PPE must be kept clean and in good repair at all times.
- DKCI may require that other companies with workers to work on our site. They shall have a comprehensive health and safety program and comply with ESS safety and environmental policies.

### 2.7.3 Review and Revision of Controls

Hazard assessments and controls are reviewed promptly after controls are implemented to monitor for effectiveness. Subsequent and regular reviews should also take place at least annually to verify that original expectations were correct, and that established controls continue to be adequate. DKCI will also re-evaluate hazard assessments and controls whenever there are changes to the operation or to the work being done.

## 2.8 Enforcement of Controls

ESS is responsible for ensuring workers are informed of job-related hazards, trained in the methods used to control these hazards and made accountable to use the controls in place. See Disciplinary Enforcement System section.

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## 2.9 Preventative Maintenance

Preventive maintenance is the systematic care and protection of tools, equipment, machines and vehicles in order to keep them in a safe, usable condition limit downtime and extend productivity. The standards for the maintenance program are based on the manufacturer's recommendations, industry standards, past incidents, and data from DKCI hazard assessments. All tools, equipment and vehicles must be properly maintained so that workers are not endangered. Maintenance tasks themselves are potentially hazardous and can result in injury. This maintenance program must be prepared at a site level and:


- Be well organized and scheduled
- Controls hazards
- Defines operational procedures, and
- Trains key personnel

General requirements for equipment maintenance include:

- DKCI will purchase tools and equipment in accordance with CSA, provincial and industrial standards.
- Obtaining a copy of the maintenance schedule recommended by the manufacturer.
- Ensuring that maintenance is performed as required.
- Ensuring that the person(s) performing the maintenance are competent (e.g. licensed mechanic).
- Retaining records of maintenance/service conducted.
- Specifying who is responsible for overseeing equipment maintenance and where the records are kept.
- Set up a system for removal and tagging of damaged or defective tools and equipment.
- Only properly trained workers are to use tools, equipment and vehicles.
- Inspect all tools, equipment and vehicles before using.
- For vehicles, inspection will consist of doing a circle check.
- If applicable, maintenance schedules for all tools, equipment and vehicles are to be respected.
- If at any time a worker judges that a tool, equipment or vehicle is unsafe for use, they are to properly tag the item and inform the supervisor immediately.
- Tools, equipment or vehicles that are tagged unsafe shall be either repaired or replaced - ESS management shall be informed.

Maintenance Personnel Qualifications - All individuals who perform maintenance work on DKCI tools shall have the appropriate skills, accreditation and/or certification. This certification applies both to ESS workers and to contracted maintenance services.

Mobile Equipment Maintenance Program - All individuals who perform maintenance work on DKCI mobile equipment will have the appropriate skills, accreditation and/or certification. This certification applies both to DKCI workers and to contracted maintenance services.

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Operator Qualifications and Training - All individuals who operate mobile equipment, cranes, vehicles etc. will have the appropriate skills, accreditation and/or certification. This applies to both DKCI workers and contracted equipment services. The approval process includes the following:

- Possession of a valid driver's license appropriate to the type of equipment
- Successful completion of a practical operating exam administered by competent and authorized personnel
- Vision test to meet the appropriate standard - Vision tests must be conducted by competent and authorized personnel
- Hearing test with or without a hearing aid must be adequate for the specific operation. Hearing tests will be conducted by competent and authorized medical personnel.
- No history of epilepsy or of a disabling heart condition or any other physical disability or impairment.
- The operator shall be trained in the following:
  - Their responsibilities to operate the equipment in a safe manner
  - Familiarity and comprehension of safety requirements for the piece of mobile equipment which they intend to operate
  - Manufacturer's operating and maintenance procedures;
  - Hand signals and/or other requirements set by DKCI.

Records - The maintenance program must contain a recording system. Part of this system should be made up of inventories and schedules. In addition, the recording system should document what maintenance work was done, when, and by whom.

Monitoring - The monitoring functions in a maintenance program fall into two areas. First, the staff responsible for operating and/or maintaining equipment must monitor that equipment to ensure that appropriate checks and maintenance are done. Secondly, management must monitor the entire program to ensure that it is functioning in accordance with DKCI policy.


Scheduled Inspections and Maintenance - All mobile equipment and tools will have a visual inspection prior to use and issues rectified immediately. In addition, tools and equipment will have at a minimum a weekly inspection to document all deficiencies. If any maintenance is required, the tool will be brought into the office or sent to the manufacturer for repair. Repairs will be documented on the inspection checklist and kept in job files for tracking. Records of all inspections and maintenance are completed and maintained for review and approval.

Maintenance of equipment, release of lubrication fluids, etc., is performed only in approved areas. Spills and leaks from equipment will be cleaned up promptly.

Vehicles (Bi-Weekly Inspection)

- Walk around to look for any deflections on the vehicle.
- Ensure the area surrounding the vehicle is clear.
- Ensure the vehicle has a spare tire.



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- Check the tire pressure to confirm it is at an adequate level.
- Verify that the side and rear-view mirrors are free of debris and are adjusted properly.
- Confirm that the windshield has no cracks.
- Check if the brake, fog lights and head lights are working.
- Check if oil, windshield wipers and fuel are at adequate levels.
- Confirm that the seatbelts are working and are attached properly.
- Documented on the ***Bi-Weekly Vehicle Inspection Checklist***

#### Facilities (Monthly Inspection)


- Walk around in the specific facility to check that the floors are free of debris.
- Check to see that the doors entering/exiting the facility are not obstructed.
- Check to see that appropriate equipment (E.g. fire extinguisher, AED machine are available as required)
- Ensure that the lighting in that facility has good visibility.
- Ensure that communication systems are available and functional (E.g. phones, alarms).
- Documented on the ***Monthly Shop and Office Inspection Template***

#### Tools (Weekly Inspection)

- Ensure that the tools are accessible from a safe location.
- Verify that the tools are in good conditions, no cracks or debris.
- Ensure that the area around the tool is tidy.
- Documented on the ***Weekly Tool Checklist***

#### Equipment (Weekly Inspection)

- Ensure that the equipment is placed in an easily accessible area.
- Check if the equipment is in good conditions, has no damage or defects.
- If applicable, verify if the equipment has been inspected as required (E.g. fire extinguishers).
- Documented on the ***Weekly Tool Checklist***

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## 3.0 CONTRACTOR & VISITOR MANAGEMENT

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### Objectives

- Ensure the health and safety of contractors and visitors at DKCI worksites.
- Ensure that contractors are deemed competent prior to entering DKCI worksites.
- Communication of the requirements during the orientation and selection process

### Assignment of Responsibilities

- Contractors and visitors as identified specific reference procedures and safety programs.

### 3.1 Orientations

Contractors are provided with an appropriate orientation before they start work on DKCI work sites. The depth of orientation for contractors will depend on the type of work and level of supervision provided. Contractors will sign off on the ***Contractor Health and Safety Agreement***

Visitors to the work site will receive a work site orientation to make them aware of the hazards and what to do if there is an emergency. At a minimum, ESS will have visitors sign in and provide them with an escort while they are on site.

Orientations will include at a minimum:

- Information on the Contractor or Visitors responsibilities
- Worksite hazards and Controls including scope changes
- DKCI Policies, Procedures and Supporting Documents

### 3.2 Selection

Ensure the Contractor is competent for the tasks they are performing

- General information, including contact and insurance information must be collected.
- Workers Compensation Board and statistical data for the previous three years is written into the ***Contractor Selection & Monitoring Form***.


### 3.3 Monitoring

Ensure the Contractor is following all the requirements

- Statistical information for the last 3 years must be inputted.
- Determine if the contractor has met all the requirements stated under the expectation's checklist.

### 3.4 Non-Compliance

Outlines the steps for resolving any contractor non-compliance concerns


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### 3.4.1 Minor Incidents

1. Contractors receive a warning from their manager
2. A formal meeting is arranged with the manager. The contractor must implement a corrective action by the date noted or face suspension
3. Workers action is noted and recorded
4. Suspension or higher may be taken

### 3.4.2 Serious Incidents

1. Contractors meet with their manager who issues corrective actions that must be met by a certain date or else the contractor's employment will be terminated.

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## 4.0 HEALTH & SAFETY COMMITTEE/REPRESENTATIVE

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### Objectives

- The primary purpose of the Health and Safety Representative (HSR) is to identify and resolve safety concerns.
- The HSR will also promote health and safety at the work site and increase two-way communication between workers and employers.
- DKCI currently sits under 20 employees total therefore will utilize a HS Representative. At the time the organization goes to 20 or more employees the full committee will be implemented.
- They allow workers to participate in occupational health and safety and support the three basic rights of workers:
  - the right to know
  - the right to participate
  - the right to refuse dangerous work

### Assignment of Responsibilities

DKCI Safety, site supervisors and workers as identified specific reference procedures and safety programs.

#### 4.1 Health and Safety Representatives (HSR)

The HS representative is chosen by the workers, unless prescribed by a union agreement.


The employer or prime contractor should:

- meet regularly with their HS representative to discuss health and safety matters
- work with the HS representative to determine how often meetings should take place and what record is made of the meetings (there are no minimum requirements in the OHS Act)
- HS representatives are working when they carry out their representative duties and must be paid at their applicable rate of pay

#### 4.2 Duties and Functions

The duties and functions of the Health and Safety Representative (HSR) are identified below.

1. Receive and consider concerns regarding health and safety
2. Respond to and find solutions for worker concerns
3. Participate in hazard assessments
4. Provide direction on determining control measures (hierarchy of controls will be utilized)
5. Develop corrective actions

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6. Monitor and follow up on corrective actions
7. Promote overall health and safety at the work site
8. Cooperate with OHS officers
9. Establish and promote worker training and education programs
10. Make recommendations regarding health and safety
11. Inspect the work site prior to the HSR meeting to be reviewed
12. Participate in investigations of incidents and serious incidents
13. Maintain records of matters related to the duties of the committee
14. Other duties as may be specified the OHS Act, Regulations, and Code

#### 4.3 Health and Safety Representative Training

HSR will undergo the following training:

- Health and Safety Committee and Representative Training – equivalency should be verified by HSE or management prior to enrollment – (8 Hour)
- CSTS 2020 or equivalent (verification by management)
- Additional training annually while in office directly related to OHS.
- HSR will be permitted to take 16 hours of HSE related training or equivalent to 2 shifts of work annually

#### 4.4 Records

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

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.

The employer must maintain copies of meeting minutes and any other relevant health and safety document for at least 2 years.


#### 4.5 Meetings

The Representative shall meet as stated below.

1. Meet within 10 days of being established
2. Meet at least quarterly with senior management
3. Meet if requested by a co-chair
4. Meet if requested by an OHS Officer
5. If a HS representative is in place meetings will be held with the ownership on a quarterly basis

#### 4.6 Agenda and Meeting Minutes

Meeting agendas and minutes will adhere to the guidelines below.

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1. Agendas and minutes will follow the **DKCI Meeting Agenda** and **DKCI Meeting Minutes**
2. Agenda will be prepared by the HSR and distributed to members prior to the meeting
3. The HSR must ensure meeting minutes are recorded
4. The HSR must ensure meeting minutes are approved and given to the employer within 7 days of the meeting
5. The HSR 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.

#### 4.7 Composition

If the organization goes larger than 20 employees then the committee's composition will follow the requirements below.

1. The committee shall consist of 4 members if the organization headcount goes over 20 people otherwise a Health and Safety Representative will be assigned for the organization.
2. One worker representative will be elected from each groups/areas/departments/union.
3. One employer representative will be appointed/elected from each groups/areas/departments/union.

#### 4.8 Co-Chairs (if required)

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

1. The worker representatives shall select one co-chair (if applicable)
2. The employer representatives shall select one co-chair


Co-chair responsibilities are listed below.

1. Alternate in serving as chair at committee meetings
2. Participate in all decisions of the committee  
Ensure that meeting minutes are recorded
3. Ensure that copies of meeting minutes are approved by the committee and given to the employer within 7 days of the meeting
4. Ensure copies of the meeting minutes are posted or provided by electronic means at the work site within 7 days after the day the meeting was held

#### 4.9 Quorum

The composition of the quorum shall follow the requirements below.

1. Consist of 4 members (one-half of the members)
2. Both worker and employer members must be present
3. At least one half of members present must be workers

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#### 4.10 Terms of Office

The terms of office for HSR members are specified below.

1. Normally not less than one year
2. May be longer than one year until a successor is selected or appointed
3. Determined as per the union's constitution
4. If there are multiple unions, determined via an agreement amongst all the unions

#### 4.11 Replacing a Member

The HSR will be replaced following the procedure outlined below. If there is a union, and the union's constitution indicates how a member is to be replaced, the HSR must follow that process.

1. Announce the departure of the HSR
2. Determine the demographic represented by the leaving member.
3. Announce the departure to the work site.
4. Hold an election to replace the member.
5. Announce the new HSR and work site.
6. Amend any documentation to reflect change.

#### 4.12 Coordinating with Other HSCs


If employer (or Prime Contractor) establishes multiple HSCs, the HSCs will coordinate with each other using the process outlined below.

1. HSCs will determine who will be the liaison between committees.
2. The employer (or Prime Contractor) will ensure contact information shared with HSCs.
3. The liaison will ensure appropriate documentation shared with HSCs.
4. The liaison will ensure relevant recommendations shared with HSCs
5. The liaison will ensure educational and health and safety initiatives shared with HSCs.

#### 4.13 Recommendations to the Employer

Recommendations to the employer should follow the requirements stated below.

1. Written using the **DKCI Recommendation Form**. Should be:
  - o Directly related to health and safety
  - o Reasonable
  - o Clear and complete
2. HSR will present to the DKCI senior management to determine a proper corrective or preventative action or solution
3. Once an agreed upon solution/action has been determined and implemented it will be communicated to the employee recommending the improvement
4. If no resolution can be determined, then 4.13 in enacted.

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#### 4.14 Dispute Resolution

With the Employer/Prime Contractor

When a matter cannot be resolved after written reasons are given by the employer, the employer, the HSR, or may refer the concern to an OHS Officer.


Within the HSR

When the committee is unable to reach an agreement regarding a health and safety matter, the HSR will arrange for a mutually agreed upon external third party to review the issue and provide a written opinion on the matter to the HSR and the employer/prime contractor within 14 days. If the HSR can not agree with the opinion of the external third party, the dissenting group will provide their written opinion on the matter to the employer/prime contractor for resolution within 14 days.

#### 4.15 Amendments

These Rules of Procedure may be amended by vote of the committee members.



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## 5.0 SAFE WORK PRACTICES (SWP) & STANDARD OPERATING PROCEDURES (SOP)

### Objectives

- An instructional tool that Supervisors can use at toolbox meetings or during completion of field hazard assessments to ensure hazardous tasks are performed in a correct and safe manner
- Affected workers should be involved in the development of SWPs and SOPs.

### Assignment of Responsibilities

DKCI Safety, site supervisors and workers as identified specific reference procedures and safety programs.

#### 5.1 Safe Work Practices (SWPs)

SWPs are methods of controlling hazards and performing jobs to minimize risk exposure to people, property and the environment. In short, safe work practices are the “do’s & don’ts” guideline on how to perform a task in a safe manner. A significant number of safe work practices focus on the safe use of equipment, tools and material handling.

A SWP should be developed when:

- Common work situations pose a risk of injury to workers, property loss or could cause environmental damage.
- There is known history of injury or other loss resulting from the work.
- A potential for loss is identified through a hazard assessment, near miss, or inspection.
- Recommendations made through an incident investigation.
- Project-specific hazard assessments identify work or situations that pose a high risk of injury or loss.
- Required by industry best practices or the owner/client.


#### 5.2 Safe Operating Procedures (SOPs)

SOPs are written, step-by-step descriptions of how to perform a job safely from start to finish ensuring control of the work process. They are intended to instruct workers about the methods used to conduct service line specific jobs, which are complex, hazardous, and/or routine or non-routine in nature.

A common method of developing SOPs is to conduct a job hazard analysis (JHA) on critical tasks to determine the sequence of events, the potential hazards, and the recommended safe way to perform the job.

#### 5.3 Location of SWPs & SOPs

A copy of the most current Safe Work Practices and Safe Operating Procedures manual will be provided to each project or work location. The Project Manager must ensure the manual is accessible for reference by all Supervisors and workers. Each SWP or SOP document will include the date it was created or last revised. All SWP and SOP documents should be reviewed annually at a minimum.

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## 6.0 VIOLENCE & HARASSMENT PREVENTION

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### Objectives

- DKCI as the employer is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of violence, domestic violence, and harassment when it enters the workplace.
- Everyone is obligated to uphold this procedure and to work together to prevent workplace violence.

### Assignment of Responsibilities

DKCI Safety, site supervisors and workers as identified specific reference procedures and safety programs.

#### 6.1 Workplace Harassment

Workplace harassment is defined as a single or continual event which includes unwanted or unwelcome comments, conduct, or bullying action(s) intending on intimidating, offending, degrading, or humiliating a person or group. This is a serious issue that creates an unhealthy work environment resulting in psychological harms to worker(s).

It does not include any reasonable conduct of an employer or supervisor related to the normal management of workers or a worksite. Differences of opinion or minor disagreements between coworkers are also not generally considered to be workplace harassment if steps are taken to resolve the conflict.

#### 6.2 Workplace Violence

Violence, whether at a work site or work related, is defined as the threatening, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm.

#### 6.3 Hazard Assessment


DKCI Hazard and Risk Management Procedure identifies situations and controls violence and harassment in the workplace throughout the JSA and Formal Hazard Assessment process.

Recognition of escalating behavior that had the potential to result in violence is an excellent way to minimize risk before a situation gets out of hand. Confusion, frustration, blame, anger, and hostility are all indicators of a potential situation.

Employees can help deescalate a situation by:

- Listening, re-assuring, disengaging in negative talk, venting techniques, using a team approach and get other team members involved.

Immediate supervisors must help to deescalate the situation and obtain support from senior management. The manager in charge of deescalating the situation must isolate the threatening situation from other employees, third

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party services, the client, and the public. Outside agencies may be required to support if the event is escalating above the supervisor’s capability to manage.

**Hazard Identification and Assessment**


The following are examples of sources of Violence and Harassment Hazards:

- Verbal or physical abuse, threats, derogatory remarks, jokes, innuendo or taunts about one’s appearance or beliefs.
- The display of pornographic, racist, or offensive images.
- Practical jokes that result in awkwardness or embarrassment.
- Unwelcome invitations or requests, either indirect or explicit.
- Intimidation, leering or other objectionable gestures.
- Condescension or paternalism that undermines self-confidence.
- Unwanted physical contact such as touching, patting, pinching, punching and outright physical assault.
- Sexual Harassment.
- Tampering with a person’s personal belongings or work equipment.
- Name calling
- Racial slurs
- Race
- Religious beliefs
- Color
- Gender
- Gender identity
- Gender expression
- Physical disability
- Mental disability
- Age
- Ancestry
- Place of origin
- Marital status
- Source of income
- Family status
- Sexual orientation

**6.4 Prevention Plans**

DKCI seeks to prevent and mitigate incidences of violence in any of our worksites. Assessment of Workplace Violence potential will be included in Hazard Assessments. Some of the strategies may include:

- a. **Training:** Employees at DKCI will be trained for Workplace Violence Awareness during Orientation, as well as over the course of the calendar year as time permits.
- b. **Workplace Design:** In some instances, DKCI may look to reconfigure the design or layout of a workspace, some of which may include moving offices or work areas.
- c. **Employee Reassignment:** In some instances, DKCI may look to reassign employees to another site as manpower will allow if a potential or anticipated risk is identified.

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## 6.5 Reporting

Workers are required to report any situation where violence or harassment is present in the workplace. Reporting of the situations can be completed through the *Workplace Violence and Harassment Complaint Form* to a Supervisor, HSE Representative or Manger. Regardless of the situation the issue will be documented.

No worker can be penalized, reprimanded or in any way criticized when acting in good faith while following this procedure and the supporting procedure for addressing situations involving harassment.

When an event happens, the supervisor must call the on-call supervisor. Any situation where a weapon is involved the supervisor must contact 911 immediately before the DKCI management team. If the worker is unable to report to the supervisor because of the situation then they can report directly to the HSE Manager.

When completing the reporting of an event ensure to include as much information as possible, including:

- Names of the people involved
- Witnesses
- Where and when the event occurred
- Behavior and words that led to the complaint

Attach any supporting documents including:


- Photographs
- Emails
- Handwritten notes
- Physical evidence (such as vandalized personal belongings)

## 6.6 Investigating

DKCI pledges to respect the privacy of all concerned as much as possible. DKCI will not disclose the circumstances related to an incident of violence or the names of the complainant, the individual alleged to have committed the violence, and any witnesses, except where necessary to investigate the incident or to take corrective action, to inform the parties involved in the incident of the results of the investigation and corrective action taken, to inform workers of a specific or general threat of violence or potential violence, or as required by law. DKCI will disclose only the minimum amount of personal information required that is necessary to inform workers of a specific or general threat of violence or potential violence.

No workers can be penalized, reprimanded or in any way criticized when acting in good faith while following this policy and the supporting procedures for addressing situations involving workplace violence. The Procedure does not discourage a worker from exercising their rights under any other law, including the Alberta Human Rights Act.

Investigations into violence and harassment situations will be conducted by the HSE Department in conjunction with Management, a HSR Representative, and any workers involved in the situation. Information till only be shared with Senior Management, the HSR Representative and the workers involved. Investigations will be conducted in the same methodology and care as a workplace personal injury event.

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## 6.7 Record Retention

DKCI will retain the required HSE investigation related documentation, and the initial reported situation for a minimum of 3 years. Are the following records retained for at least a complete audit cycle and include:

- Training records
- Inspections
- First aid records
- Incident reports
- Incident investigations
- Safety meeting minutes

## 6.8 Disciplinary Actions & Outcomes

Employees who are determined to be the instigator of workplace violence or harassment following the investigation will be subject to disciplinary action up to termination. Formal notice of actions taken will be documented and kept in the employees HR file.


In the aftermath of the event, you must discuss through an HSE Alert with our employees, the incident itself and encourage dialogue among staff and workers as to how to prevent such acts in the future.

## 6.9 Worker Support

ESS will offer support to workers who are affected by an incident of harassment or violence in the workplace. The affected workers will be advised to consult a health professional (of the workers choice) for treatment or referral. DKCI will look at the workers benefit program to see if there is any coverage.

Following OHS Legislation DKCI cannot make any deductions from the workers wages and benefits if the treatment sessions occur during regular work hours.

Victims of violence and harassment should also be informed of their legal right to prosecute the perpetrator(s).

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## 7.0 PLANNED INSPECTIONS

The DKCI inspection program clearly outlines what needs to be inspected, who will be involved, how often the inspections should be performed and who is responsible for corrective actions and follow-up. The results of the inspection program will provide information on whether the hazard assessment requires review, preventative maintenance programs are effective, and ESS training programs are adequate.

### Objectives

- To provide a method to review and verify compliance with the DKCI HSMS
- To proactively identify potential hazards that may not have been previously noted
- To confirm the effectiveness of controls already in place
- To demonstrate commitment to health and safety

### Assignment of Responsibilities

#### DKCI Safety

- Ensures inspections are conducted
- Develops the inspection schedule and scope
- Communicates inspection findings
- Verifies non-compliance and non-conformance areas are corrected
- Tracks inspection findings and communicates progress toward closure of findings

#### Site Manager and Supervisors


- Develops and implements corrective and preventive action for deficiencies
- Tracks inspection findings until the responsible party has corrected the deficiencies
- Participates in site safety inspection

## 7.1 Types of Inspection

### 7.1.1 Formal Inspections

The team or individual conducting the formal inspections will use the DKCI Work Site Inspection Form to record items identified during the inspection. The form will serve to prompt inspectors to check for specific items and will create a consistent standard for the gathering of information. The inspection team will be looking for:

- Unsafe Conditions: slippery floor, poor lighting, cluttered work area, slipping hazards, missing guards, etc.
- Unsafe Actions: improper use of machinery or equipment, workers not wearing personal protective equipment or following safe work procedures, etc.
- Health Hazards: dangerous chemicals, dust exposure, noise, toxic waste, etc.

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Once the formal inspection has been completed an inspection report will be written and reviewed by the inspection team. The items identified on the inspection report will be assigned and ranked in order of importance, using the 1, 2, 3 system to prioritize hazards and ensure those with the highest potential for causing injury are corrected first.

- Class 1 Hazards: those that pose an imminent danger and require immediate correction
- Class 2 Hazards: those that are not imminently dangerous, but pose a significant hazard and must be corrected as soon as possible
- Class 3 Hazards: those that are a low hazard, and should be addressed when time allows

Any Class 1 Hazards identified must immediately be brought to the attention of the appropriate supervisors and corrections made.

To address identified Class 2 or 3 Hazards, a system must be put in place to ensure timely and appropriate corrective action.

Copies of the inspection report will be given to senior management, the Health and Safety Committee (if applicable), and the supervisors of the areas being inspected.

A copy of the report, including both negative and positive findings, will be posted for workers to review, and a copy will be kept on file for the next inspection team so that they can identify any repeat items.

Records of inspections and will be kept for future reference and statistical review.

### 7.1.2 Informal Inspections


Informal are carried out by workers, supervisors and managers and do not involve a formal report or a specific schedule. Some examples of informal inspections include:

- A manager walking through the shop may take the opportunity to verify that workers are following safe procedures, using safety equipment, or following healthy work procedures and provide feedback on their safety performance.
- A tradesperson conducts a routine check on their tools, looking for defects and maintenance needs prior to starting work each day.

The results of an informal inspection will be acted on immediately, required changes will be made on the spot and worker feedback (both positive and constructive) will be made verbally. Inspection information will only be recorded and reported if the situation requires it.

## 7.2 What Needs to be Inspected

The results of the formal hazard assessment and hazard control process are used to determine what equipment and work sites will need to be inspected. The OHS legislation for the area being worked in also determines if there are specific inspection requirements relevant to the nature of the work being performed.

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### 7.3 Inspection Frequency

Work sites be inspected at least once a month and more frequently its non-conformances indicate the need.

### 7.4 Who Conduct Inspections

Work site inspection tours will be performed by a team. The team will consist of the senior member of the work location, if possible another manager of a different location, a designated safety representative and if there is a health and safety committee at the site, they will be involved in the inspection process. Inspections of specific pieces of equipment can be done by an individual, competent worker.

### 7.5 Conducting Inspection

The inspector completes the DKCI Safety Inspection Checklist form for each inspection by interviewing people, reviewing records, and touring the site.

An inspection closeout meeting is held between the inspector and appropriate site personnel to review information and identify areas of non-conformance.

Findings are communicated to the appropriate Supervisor and DKCI Safety by sending a copy of the checklist to these positions.

### 7.6 Training


Inspectors shall be formally trained. Training should contain, as a minimum the following areas:

- Learning Objectives and Outcomes
- Terms
- The Law
- The Purpose of an Inspection
- Types of Inspections
- What to Look For
- Health and Safety Code
- Unsafe Act
- Unsafe Conditions
- Conducting an Inspection
- Classification of Hazards

### 7.7 Accountability

Non-conformances are to be corrected and are the primary responsibility of the appropriate Supervisor and supervisors and will be monitored by ESS Safety.



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## 7.8 Communicating Results of Inspections

Results of the inspections (both positive and negative findings) will be posted for workers to see and include the expected timelines for follow-up action.

Results shall also be provided to senior management of DKCI via the Work Site Inspection Form.


## 7.9 Inspection Forms

The Work Site Inspection Form is the primary inspection form to be used. Any other inspection forms will include:

- a checklist of items to be inspected
- a description of the hazards to look for
- space to list suggested actions required to remove or control the hazard
- priority ranking of when the non-conformance needs correcting
- name of the person responsible to correct the problem
- date by which the action is expected
- actual completion date.

All inspection forms will be dated and indicate the location and inspection team members.

The person named as responsible for inspection follow-up will be the supervisor in control of the area where the hazard is found. The site manager has overall responsibility for ensuring corrective action has been taken and should review and sign-off all inspections.

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## 8.0 QUALIFICATIONS, ORIENTATION AND TRAINING

### Objectives

- To ensure the competence of personnel (physically and mentally capable of the task assignment) to carry out their designated function.

### Assignment of Responsibilities

#### DKCI Safety

- Identifies updates and monitors training for workers.

#### Site Manager and Supervisors

- Shall ensure all workers assigned to their project complete training identified;
- Shall ensure that any work that may endanger a worker must be completed by a worker who is competent to do the work;
- Shall ensure all workers assigned to their project are trained in procedures until they are competent, and
- Shall ensure all workers have sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

#### Employees

- Attend and follow requirements of health and safety management training.


### 8.1 Qualifications

Minimum qualification and training requirements for each job title have been established by DKCI. Qualifications may include a combination of education, certifications, and work experience. Health and safety training completion for the specific job title is required before full qualifications are met to allow a worker to begin work. Additional documentation may need to be obtained from workers to demonstrate they meet the qualifications of their job. Based on the job description requirements documentation may include educational, certifications, licenses, prior acceptable training course completion, etc. Documentation is reviewed and confirmed as actual during the worker hiring process.

### HSE Competency Assurance Process

HSE Competence is a combination of knowledge, understanding and skill, and the appropriate level of competence cannot be acquired simply by attending a training session. The understanding and skill are acquired by experience. For individuals controlling health and safety hazards and risks, experience and training are essential. The following components are to be considered for each work site's delivery team for HSE competency assurance:

**Experience                      Level of Knowledge                      Capability to Perform**

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Upon hire with DKCI the designated person will participate in the competency assurance process. This process begins with the selection of the person who enters a continuous improvement loop that will stay with the worker during his career with DKCI. At DKCI our view of competency assurance involves the continuous assessment of training and development needs against a person's responsibilities, abilities, and critical activities. Not only will the individual gather evidence of competence, they will also participate in an annual appraisal to assess their performance, behaviour and personal development for health and safety. This process enables the continuous improvement loop that feeds back into training and development activities that ensure competency assurance is an ongoing career cycle process.

1. Job Description Identified → Candidate Selection and Hiring Process (Reference and Background Check, Drug Screen, Physical Assessment) → Person Assessed and Hired for Open Position
2. Experience, Qualifications Assessed for Initial Training ↔ Initial Induction Training Completion
3. Further Training Required? If no → Ready for Work → On the Job Training → Competency Continually Assessed
4. Annual Performance Appraisal → Ready to Promote? → Employee Promoted → Further Training Required?


For individuals directly managing risk the specific requirements will be matrixed with training for areas such as legislative requirements, client HSE requirements and recognized certification and licensing.

## 8.2 Orientations

Employees receive initial induction training. No work by any worker can begin until the orientation is completed.

New employee orientations are completed during the first week of employment and before the new employee starts work. The orientation topics are prioritized, and critical health and safety information are covered during the first day of employment. Critical issues include:

- Work Site Tour and Introductions
- DKCI Health and Safety Manual
- DKCI rules/enforcement
- Job responsibilities
- Right to Refuse Unsafe Work
- OHS Legislation
- Critical job hazards and controls in place
- Training requirements
- WHMIS
- First Aid
- Incident notification/hazard reporting/duty to report
- PPE
- Assigned Co-worker
- Emergency response procedures

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Specific safe work procedures and practices are also reviewed during orientation and, if required, health assessments (such as hearing tests) are done at this time.

Transferred or reassigned employees receive orientations before they start their new job. Documentation of when orientations were done, who conducted the training, topics and the names of the workers trained is completed via the DKCI Health and Safety Orientation Checklist which requires employee and supervisor sign-off.

Contractors are provided with an appropriate orientation before they start work on ESS work sites. The depth of orientation for contractors will depend on the type of work and level of supervision provided.

Visitors to the work site will receive a work site orientation to make them aware of the hazards and what to do if there is an emergency. At a minimum, ESS will have visitors sign in and provide them with an escort while they are on site.

### 8.3 Worker Training

#### 8.3.1 Identification of Training and Competency Needs

Training is required depending on job function which is determined at hire on or for specific sites or tasks.

#### 8.3.2 Training Records and Documentation

All training records are maintained on site either by the ESS Safety or senior representative of management or their designee. All training must be documented with date; worker name, worker signature; instructor name; instructor signature and title of course.


#### 8.3.3 Supervisor Safety Management Training

Newly hired or promoted supervisors and managers receive safety management system training. Training shall consist of:

- Supervisor's Role
- Hazard Identification, Assessment, and Control
- Formal Workplace Inspections
- Accident/Incident Investigation

#### 8.3.4 Short Service Employee Program

The purpose of the Short Service Employee (SSE) Management program is to prevent work related injuries and illnesses to new hires and temporary workers. The Supervisors and co-workers must be able to readily identify Short Service Employee participants. DKCI will assign experienced workers to oversee the daily activities of those assigned to the SSE program. Short Service Employee – A worker or sub-contractor worker with less than six months experience in the same job or with his/her present employer.

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- Supervisors will assure that all new, transferred, and temporary workers have been through DKCI Safety Orientation and have a complete knowledge of the expectations for their job function.
- Mentors will set the proper safety example for any Short Service Employee assigned them.
- Mentors will be assigned one short service worker. Short Service workers on client locations shall make up no more than 50% of a crew.

#### 8.4 Job Specific Training

Workers will also require specific on-the-job training to do their jobs in a safe and effective manner. Using hazard assessment data ESS must assess which jobs require job-specific training and ensure training is provided for the completion of tasks where specific health and safety hazards are known to exist.

DKCI will determine who is competent to provide this training and the supervision required until the worker is deemed competent.

Job-specific training will be provided to both new and transferred workers and refresher training will also be held on a regular schedule.

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## 9.0 EMERGENCY RESPONSE

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### Objectives

- To meet legal requirements to establish an Emergency Preparedness and Response Program (EPRP) for an emergency that may require rescue or evacuation
- To consult with affected workers in establishing the ERRP
- To subject it to regular review
- To ensure that it is current

### Assignment of Responsibilities

#### DKCI Safety

- Develop, review, and implement emergency response plans and procedures
- Ensure workers are aware of emergency plans through training
- Monitor effectiveness of emergency plans

#### Supervisors

- Responsible for ensuring necessary assets are made available for all emergency procedures
- The implementation of the emergency procedures or plans for their work site

#### Employees

- Follow all contingency procedures or plans
- Through the Joint Health and Safety Committee reviewing and revising as required the emergency response plans


### 9.1.1 Identifying Potential Emergencies

Refer to DKCI Emergency Preparedness and Response Program. Each DKCI work site shall have an EPRP that identify all potential disasters or emergency situations DKCI may face.

DKCI will review hazard assessment documents, the results of incident investigations and consideration of the potential for hazards around the work site. DKCI will assess the potential for harm to people, property, equipment, and the environment for each potential emergency situation.

The types of hazards to be addressed by the ERP need to include both work-related hazards and hazards which may be introduced onto the work site by one of the following sources:

- Natural disasters
- Man-made events
- Technological failures

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Once all potential emergencies have been identified plans for dealing with them are developed, communicated, and tested. These shall include, as a minimum:

- Plans for responding to an emergency that may require a need for rescue or evacuation is found.
- Plans to address thermal exposure of heat and cold
- Plans to address workplace violence
- Plans to address working alone
- Plans to address severe weather
- Plans to address medical emergencies
- Plans to address any other known or potential emergency

### 9.1.2 Evacuation

Contained within the DKCI Emergency Preparedness and Response Program are evacuation procedures for the work site, establishment of safety zones and muster points where people being evacuated can gather. Individuals are assigned to assist mobility-impaired persons in the event of an emergency. Alarm systems to be used are established in the event of an emergency and they must suit the specific needs of the work site.

### 9.1.3 Communication

Specific communication systems for use in the event of an emergency have been developed and emergency contact numbers posted where they are most likely to be needed (*See Emergency Contact List*). DKCI will include the names of local medical staff that could respond quickly in an emergency and will ensure these responders know that they are on the DKCI Emergency Contact List Form.


### 9.1.4 Training

All employees will be trained in what to do should a specific emergency occur. Training includes basic emergency response information (e.g. alarms, muster points, emergency exits) as part of the new worker safety orientation and staff assigned specific emergency response duties also are to receive specialized training they need to ensure they are competent to perform their assigned tasks.

Employees assigned to be first aiders, fire fighters, floor wardens, etc., must know how to respond appropriately, and how to use any emergency equipment required. Those with less responsibility in the event of an emergency must at a minimum know how to respond to an alarm and whom to call for assistance. Everyone should know who will take charge and coordinate the evacuation, who will sound the alarm, and who is trained in first aid.

### 9.1.5 Emergency Equipment

Emergency equipment must be identified, available on site and maintained in good operating condition. Requirements will vary depending on DKCI work site locations and the nature of the work performed and worker population. OHS legislation is referred to determine minimum requirements for first aid kits, fire extinguishers, water

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hoses, emergency showers, emergency lighting, breathing apparatuses, ladders, stretchers, emergency communication equipment, etc.

Emergency equipment is to be in accessible locations and DKCI has established a regular schedule to service and inspect all emergency equipment including first aid and rescue equipment.


#### 9.1.6 Disaster Services

If required, the DKCI Emergency Preparedness and Response Program may need to be reviewed with local emergency response agencies to ensure they have all the information they need to mount an effective response in the event of an emergency.

#### 9.1.7 Drills

Drills must be held at least annually. Drills will be held for all types of emergency and will include all work areas and all shifts. Records of both drills and actual emergencies will be kept and reviewed after each incident/exercise to identify areas where improvements can be made. See Evacuation Report Form.



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## 10.0 INCIDENT INVESTIGATION

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### Objectives

- To have effective procedures for reporting and evaluating/investigating incidents and non-conformances to prevent further occurrences.

### Assignment of Responsibilities

#### DKCI Safety

- Ensures investigations are conducted and assists in identifying corrective actions.

#### Supervisors

- Investigates (or assists in) incident investigations
- Corrects non-conformances

#### Employees

- Immediately report any injury, job related illness, spill, or damage to any property to their immediate supervisor. If their immediate supervisor is not available, the worker is then to immediately notify the manager.


### 10.1 Incident Reporting Policy Statement

DKCI requires the immediate (as promptly as possible) verbal reporting all incidents, workplace-related illness, and near misses. The immediate supervisor is initially notified and then Safety shall be contacted. Written notification shall follow verbal notification. Supervisors are required to complete the DKCI Incident Report Form and the Incident Investigation Report Form and utilize the DKCI Witness Statement Form for the workers and witnesses to the incident. All workers will be trained to these standards through employee orientations (Duty to Report) and periodic refreshers will be included in team or safety meetings to reinforce the importance of incident reporting. Failure to report incidents, hazardous work conditions or near misses shall result in disciplinary action.

### 10.2 Incident Investigation Policy Statement and Procedures

Refer to DKCI Incident Investigation and Reporting Program. It contains:

- The timeframe for investigations (as soon as possible after the injured have been cared for, and all the potential hazards are removed)
- Who will be responsible for leading the investigation and the training required
- A requirement for participation from all levels (including managers, supervisors and other workers who might bring specialized skills or knowledge to the investigation process)
- Basic steps for conducting the investigation
- A requirement to identify indirect, direct, and root causes

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- A requirement to identify corrective action, a specific person responsible for follow-up and an associated timeline for completion
- A requirement for senior management review and sign-off once investigations are complete and follow-up action has been taken to prevent a recurrence of the incident

In the case of a major injury or incident the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.

Incident investigation occurs as soon as possible, while the facts are still fresh within the minds of those involved (i.e. witnesses). Take the opportunity to talk to all of those involved before they become unavailable or memory fades. An incident investigation must be thorough and concerned only with cause and prevention and must be separate from administrative disciplinary action.

Employees will be made aware of investigation policies and procedures and investigation results will be routinely shared with employees at safety meetings, posted at the work site, and/or emailed to employees and other business units. *See Incident Notice Form.*

### 10.2.1 Escorting Employees to Medical Treatment

Whenever possible an authorized individual shall escort any injured worker to the medical provider for initial treatment. This is to ensure the medical provider has all required information regarding the administration of workers compensation, availability of return to work job functions available and to ensure the worker receives the best possible medical attention.

### 10.2.2 Incident Classifications

Near Miss – An incident occurred that had the potential of becoming a higher-level incident of actual injury, damage, etc.

Job Related Injury – An injury to staff, contractor or client staff occurring during work related activity.


Job Related Illness – A job related illness effecting staff, contractor or client staff occurring during work related activity.

Fatality – An injury resulting in the death of a worker.

Vehicle Damage – Damage to personal, business, contractor or client owned vehicles or mobile equipment.

Property Damage – Damage to personal, business, contractor or client owned property occurred.

Security Incident – Any incident involving the security of staff, contractor or client facilities, theft, violence, or other security related incidents.

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Fire/Explosion/Flood – Any unplanned incident involving fire, explosion, or flood.

Spill – The unintended release of a hazardous substance that touches the ground.

Contractor Related – Any incident involving a contractor of ESS.

Non-conformance – An incident occurred because a safety, environmental or quality rule, policy or procedure was not followed.

Regulatory – Any violation of federal, provincial, municipal or client legal or other requirements.

### 10.2.3 Job Related Injury Classifications

Injuries shall be classified per the following:

Fatality – An injury resulting in the death of a worker.

First Aid – Dressing on a minor cut, removal of a splinter, typically treatment for household type injuries.

Lost Workday Case (LWDC) – An injury that results in a worker being unfit to perform any work on any day after the occurrence of an occupational injury.


Number of Lost or Restricted Work Days – The number of days, other than the day of occupational injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked.

Occupational Injury – An injury which results from a work-related activity.

Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work that resulted in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Do not include minor treatments (first aid) for illnesses.

Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) and yet results in no lost work time beyond the day of injury.

Restricted Work Day Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the day of injury. An

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example would include an injured associate is kept at work but not performing within the essential functions of their regular job.

Work or Work Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable and are to be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered a worker’s primary work are not reportable.

The following are examples of incidents that will not be considered as recordable:

- The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or in flu shot, exercise class, racquetball, baseball, etc.
- The injury or illness is solely the result of a worker eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). The injury or illness is solely the result of a worker doing personal tasks (unrelated to their employment) at the establishment outside of the worker's assigned working hours.
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the worker is infected at work).

#### 10.2.4 Corrective Actions

Site Managers are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at each site and tracked by DKCI Safety to ensure timely follow up and completion.


Corrective actions are also used as needed for revisions to site specific safety plans and the DKCI Health and Safety Management System.

All incident investigations will be brought to closure.

### 10.3 Legal Requirements

In addition to internal reporting requirement for DKCI there are additional legal requirements for notification:

- Provincial OHS acts require DKCI to investigate any serious injuries and report specific types of incidents. These may include any fatalities or injuries where a worker is hospitalized for two or more days and incidents involving fire, flood, explosion, building collapse, and collapse/upset of a crane, derrick, or hoist. DKCI shall follow the local provincial reporting requirements.
- Various provinces have first aid legislation that requires all injuries treated at the work site be recorded and the record be treated as confidential and kept in a secure area for three years. DKCI shall follow the local provincial reporting requirements.

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- Each province's WCB legislation requires that certain forms be filled out by DKCI and the worker when a worker is injured or ill due to work for workers compensation requirements. DKCI shall follow the local provincial workers compensation requirements.
- If an injury is serious or had the potential to be serious, the local province may also investigate at the work site. When this happens, all employees are required to co-operate with the investigation.

#### 10.4 Incident Report and Investigation Forms

DKCI has developed standard incident report and investigation forms for use.

##### 10.4.1 Incident Report Form

The DKCI Incident Report Form is required to ensure that all relevant information is captured and maintained. The incident report form will be completed immediately after the event by the worker(s) involved and a copy given to the worker(s). The DKCI copy of the Incident Report Form is used to initiate the incident investigation and will be maintained on file.

##### 10.4.2 Incident Investigation Report Form


The DKCI Incident Investigation Report Form prompts the investigation team to follow correct investigation procedures and will lead them to the identification of the root causes and appropriate follow-up action.

##### 10.4.3 Witness Statement Form

The DKCI Witness Statement Form will be utilized to obtain worker and witness information related to all incidents. The form should be completed as soon as possible following the incident, will be dated, and signed and attached to the Incident Report Form and Incident Investigation Report Form.

##### 10.4.4 Incident Notice Form

To communicate incident information and lessons learned from incidents the DKCI Safety Rep shall send the Incident Notice Form to all work sites. The form shall be posted on worker bulletin boards and shall be discussed in weekly safety meetings until all workers at the job site have been informed of the incident.

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## 11.0 PROGRAM ADMINISTRATION

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### Objectives

- To monitor and ensure continuing suitability, adequacy, and effectiveness of the HSMS
- To address needs for communication and changes to our HSMS

### Assignment of Responsibilities

#### DKCI Safety

- Monitors health and safety compliance status and HSMS effectiveness with top management
- Updates the HSMS where appropriate based on audits and decisions made in the Management Review
- Implements changes identified in the management review process and resource assessment

### 11.1 Records and Records Management

DKCI must ensure that all aspects the Health and Safety Management System are recorded, tracked, and maintained. The record tracking system allows for statistical analysis and the identification of trends that may identify system areas in need of improvement. Examples of records that are maintained include:

- Employee training records
- Work site inspection records
- Incident investigation reports
- Preventative maintenance records
- Health and safety meeting minutes


Health and safety program records should be kept for a minimum of three years.

#### 11.1.1 Access to Medical Records

Health and safety records will be identified by DKCI Safety and are maintained based on legal, regulatory, and business requirements.

Safety will maintain applicable medical and exposure records for all workers. All requests to access medical and exposure records and analysis based on those records must be submitted to using the forms provided for that purpose.

Safety will assure access of each worker and/or their designated representative, to all exposure and medical records concerning the worker's work conditions or workplace within 15 working days from the day request is made. If the records cannot be provided within 15 working days, the worker or designated representative requesting the record shall be informed with the reason(s) for the delay and the earliest date when the record(s) can be made available.

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The authorized physician, nurse or other responsible health care personnel maintaining worker's medical records may delete the identity of anyone who has provided confidential information concerning the worker's health status but cannot withhold the information itself.

When an analysis of medical records identifies the worker, a physician may remove direct or indirect personal identification. If this cannot be done, the personally identifiable portions need not be provided to the person seeking such information.

Employees and their designated representatives will be permitted upon request access to past and present exposure data to toxic substances or harmful physical agents.

Copies of exposure records of other workers with past or present job duties or working conditions like or similar to those of the worker will also be provided upon request.

Any worker or designated representative is also permitted access to any record of exposure information which pertains to a new workplace or condition(s) to which the worker is being assigned or transferred.

### 11.1.2 Records Filing and Accessibility

Safety and health records shall be legible, identifiable, and traceable to the activity, product or service involved. The records shall be stored in identified secured locations and maintained in such a way that they are readily retrievable and protected against damage, deterioration, or loss.

### 11.1.3 Document and Data Control

The DKCI Safety:

- Is responsible for validating and approving all documents and revisions to existing documents,
- Is responsible for assuring documents included in an HSMS are in the proper format, and
- Will ensure documents can be located, current versions are available, and obsolete documents are removed and determine the routing path for review of a controlled document


#### Document Format

HSMS documents shall be consistent in format and include a document date and revision number.

#### Document Distribution

This manual is maintained on the DKCI server and is available to the following personnel:

DKCI Owners	Human Resources Rep	
Site Supervisors	Safety Department	Clients upon request

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Only PDF versions of this manual are available to non-authorized persons. The master documents are maintained under a secure computer access configuration. Only PDF documents will be distributed with a self-expiring footer showing as uncontrolled after 24 hours from time of printing.

## 11.2 Communication

Communication is introduced to the site through health and safety meetings, training sessions, field-level hazard assessments, etc. All suggestions from workers are recorded and recognition of the worker's involvement and co-operation will be given. DKCI wants to encourage participation in good health and safety practices and support for our policy and Objectives by consulting and communicating with all workers.

Methods used to involve workers in hazard identification, risk assessment and risk control and to encourage worker involvement in the health and safety process include:

### 11.2.1 Open Door Policy

It is preferred that the immediate supervisor and/or project management be consulted for resolution of the concern; however, DKCI maintains a strong open door policy to report problems or concerns to any level of management without fear of reprisal of any worker.

### 11.2.2 Incident Notice Form

This communicates lessons learned from incidents, is posted on worker bulletin boards, and shall be discussed in weekly safety meetings.

### 11.2.3 Weekly Safety Meetings


Employees are required to attend safety meetings. Meetings will be documented on the daily FHA form.

## 11.3 Accountability

There is accountability with the DKCI HSMS. Individuals, visitors, and contractors will be held accountable for their actions and behaviour. Refer to 1.12 (Assignment of Responsibilities) and 1.13 (Employee Health and Safety Evaluation). It is important that everyone understand their responsibilities for workplace health and safety:

- DKCI hold the ultimate responsibility and is legally and morally responsible for what happens on its work sites.
- Supervisors have the administrative responsibility and must ensure that required training, supervision, enforcement, etc. are maintained and the desired results are achieved.
- Workers have the immediate responsibility to take the required training, wear required PPE, use the assigned controls, follow all rules, and participate where required in the health and safety program.
- Contractors shall follow DKCI health and safety requirements.



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DKCI procedures identify who is responsible for what, the date by which actions must be completed and the follow-up required to ensure that action taken was effective.

Measurable goals and Objectives and assigned accountability are used to drive health and safety performance.

#### 11.4 Monitoring Statistics

DKCI maintains an ongoing system for recording events to compare statistics over a period of time. Leading indicators measure the activities used by the organisation to reduce the likelihood of an incident. Lagging indicators analyze the frequency, severity, and type of incidents.

DKCI will maintain and analyse statistics to help identify trends in both leading and lagging indicators. Leading indicators that can tell if systems are working as expected could include:

- Records of inspections - Are inspections being performed as required?
- Meeting minutes - Are safety meetings being held according to the schedule?
- Investigation reports - Are appropriate causes being identified? Are corrections being made in a timely manner?

Maintaining statistics over time will allow the identification of trends which can be useful in determining where system changes may be needed.

Lagging indicators that can be useful to identify areas in need of improvement could include:


- The number, severity and cost of injuries and other incidents at the work site
- The number of days lost due to absenteeism
- Maintenance records

To further identify where improvements can be made DKCI should, where possible, compare its health and safety records to those of similar companies in the same industry.

#### Health and Safety Key Performance Indicators (KPI)

KPIs are used to determine what changes need to be made, to review individual project management success towards compliance and to track progress towards published goals and Objectives. KPI results are supplied to DKCI management monthly. Health and Safety KPIs are tracked for each Supervisor's responsible area and include:

- Injuries
- Days Away from Work Cases
- Restricted Work Cases; Recordable Medical Cases
- Total Recordable Injuries/Illness and Incident Rate
- First Aid Cases
- Hours Worked

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- Vehicle incidents and property damage or loss
- Reportable spills
- Workers compensation data

### 11.5 Audit System

Whether completed by internal or external auditors, annual audits give DKCI a means of identifying how its system measures against a recognized standard. Audit results communicate program successes as well as identify areas in need of improvement and will form the basis of action plans designed to make specified individuals accountable for corrective action within set timelines.

Management will follow up on the status of the action plan on a regular basis to ensure action items are being completed. The DKCI Safety maintains a record of the audit. Results of the annual audit are incorporated into changes to the DKCI Health and Safety Management System, site specific HSE plans or appropriate safety procedures.

#### Requirements:

- The health and safety system will be evaluated at least annually using an audit process.
- An action plan will be developed and implemented as a result of any internal or external audit.