

ROWE'S CONSTRUCTION

EMPLOYEE &
CONTRACTOR:

HEALTH / SAFETY /
ENVIRONMENTAL
& EMERGENCY
RESPONSE HANDBOOK

January 2021



NORTHERN CONSTRUCTION
SAFETY ASSOCIATION

Our Pledge to Health, Safety & Environment

Rowe's Construction is committed to the goal of providing and maintaining a healthy and safe working environment, with a view to continuous improvement. This goal is only achievable by adherence to established objectives striving to exceed all obligations under applicable legislation and by fostering an enthusiastic commitment to health, safety, and the environment within Rowe's Construction. In particular: Management and Supervisors, working in cooperation with employees and the Joint Health and Safety Committee, will strive to take all reasonable steps to identify and reduce workplace hazards to as low as reasonably achievable. Supervisors and managers are held accountable for the health and safety of all employees under their supervision. This includes responsibility for appropriate training and instruction, appropriate follow-up on reported health and safety concerns, and implementation of recommended corrective action. This accountability is integrated into the performance appraisal system. Supervisors, workers, sub-contractors, and visitors are expected to perform their duties and responsibilities in a safe and healthful manner. They are accountable for the Health and Safety of themselves and others. Rowe's Construction is committed to providing employees with all necessary training and instruction to ensure that appropriate work practices are followed on the job and to promote their use off the job. If necessary, Rowe's Construction will take disciplinary action where individuals fail to work in a healthy and safe manner, or do not comply with applicable legislation or corporate policies and procedures. Health, safety, and the environment in the workplace are everyone's responsibility. Rowe's Construction expects that everyone will join in our efforts to provide a healthy and safe working environment on a continuous day to day basis. Only through the dedication and efforts of all individuals can Rowe's Construction succeed in providing a healthy, safe working environment.

This book issued to:

Your Name: _____

Contractor Name (if applicable): _____

Date: _____

Who hired you from Rowe's? _____

"Keep this handbook readily available during working hours."

Contractors (in general):

- If your company has a Health & Safety Program, please advise and submit a copy to Rowe's Construction project manager and our HSE team, please call 867-874-6110. We will review, and if it meets applicable legislation, best practices, Rowe's Construction, and client's standards, we can accept. Should it not match or you do not have one, your company will be required to follow Rowe's Construction Health and Safety Program. This handbook is mandatory and is only guidelines; current legislation takes precedence over this handbook.
- You and your crew member(s)/employee(s) must be familiar with and abide by current legislation (National, Federal, Territorial, Provincial, Municipal, Labor, etc.) regarding all duties hired for. You must be situated appropriately for emergency preparedness in accordance with WSCC or Federal regulations. Review prior to arrival and plan ahead, Ensure compliance!
- A Contractor Prequalification review will be requested.
- It is mandatory to have valid WHMIS certification and any other required certifications issued by your company or 3rd party, for example, TDG, H2S, Fall Protection, 1st aid, aerial lift, supervisory, etc.
- All contractor tools/gear are to be in safe working order in accordance with manufacturer specifications and laws.
- Throughout this booklet, you may be referenced as an employee, staff, worker, or supervisor if this is your hiring position with Rowe's Construction.

Should you have any concerns or questions with this booklet's content, STOP and advise immediate supervisor or safety representative.

***“Everyone's Safety is First and Foremost
We do things the right way, not the easy way.”***

The Employee and Contractor Health, Safety, Environmental, and Emergency Response Handbook is designed as a reference guide and does not excuse full compliance with the Rowe's Construction Occupational Health and Safety (OHSE) Program and the WSCC Safety Acts and Regulations (Industrial and Mining).

In the event of any discrepancy between the OHSE Program and this Handbook, the OHSE Program will take precedence. This handbook and company OHSE Program do not take precedence over current WSCC Safety Act and Regulations and/or federal legislation where applicable.

Should you have any questions regarding this handbook or the OHSE Program, please contact any of the following:

Colin Steadman	HSE Manager	867-875-2805
Gerald Boucher	HSE Coordinator	867-876-0255
Ashley Rowe	HSE/HR Admin.	867-875-2518
John Dempsey	HSE Coordinator	867-696-6742
HSE Office	Hay River	867-874-6110

ROWE'S CONSTRUCTION

EMPLOYEE & CONTRACTOR: HEALTH / SAFETY / ENVIRONMENTAL & EMERGENCY RESPONSE HANDBOOK

25 Studney Drive	Box 347
Hay River, NT	Fort Simpson, NT
TOLL FREE: 877-874-3243	TOLL FREE: 877-695-3243
PH: 867-874-3243	PH: 867-695-3243
FAX: 867-874-6558	FAX: 867-695-2818

CALL BEFORE YOU DIG! 1-888-920-3546 for Northwestel

Hay River and Fort Simpson, NT	
NWT Power	867-695-7122
Northwestel	611
Stittco Utilities	867-874-2432
Northland Utilities	867-874-6879

**OWNER or LEAD AGENCY of property varies from site to site.
Ensure appropriate contacts are made to verify utilities' locations.
Get confirmation in writing!**

**To obtain a copy of the
Occupational Health & Safety / WSCC- Act,
Regulations & Codes:**

**See our Main Office/Shops, Camps on remote sites, or ask your
Supervisor or Safety Representative. Also available online at
www.wscc.nt.ca**

**If working in another Province or Territory be sure to obtain
and refer to the applicable Occupational Health & Safety
Act/Regulations/Codes**

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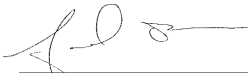
Abbreviations:

COR:	Certificate of Recognition
Dept.:	Department
FLHA:	Field Level Hazard Assessment
GHS:	Globally Harmonized System (WHMIS 2015)
H&S:	Health and Safety
HSE:	Health/Safety/Environment
Hrs.:	Hours
JHA:	Job Hazard Assessment
JOHSC:	Joint Occupational Health & Safety Committee
NSC:	National Safety Code
OH&S:	Occupational Health and Safety (Health & Safety Legislation)
PPE:	Personal Protective Equipment (hard hat, safety glasses, etc.)
RTW:	Return to Work
SDS:	Safety Data Sheet (WHMIS GHS)
SOP:	Standard Operating Procedure (actual steps to be taken for the task)
SWP:	Safe Work Practice (the "Do's and Don't")
TDG:	Transportation of Dangerous Goods
WCB:	Workers Compensation Board
WHMIS:	Workplace Hazardous Material Information System
WSCC:	Workers Safety and Compensation Commission (Legislation)

TO ALL EMPLOYEES / CONTRACTORS:
SAFETY STATEMENT

Our company wants to be a leader in the communities and industry in the promotion of accident/incident prevention. The health and safety of employees, contractors, customers, and the public we interact with daily are of paramount importance to me, and thus is an integral part of company policy. We must continue to cooperate fully to reduce the frequency and severity of incidents in our shops, offices, and construction sites. We must have a responsibility for our own safety and the safety of others. The nature of our business is such that all hazards cannot be eliminated entirely, but in every case, we expect that each of us will cooperate to minimize these occurrences. People are our most important asset. Thus, all our supervisory personnel and all other employees shall make every effort to ensure that we have a safe and efficient operation.

Sincerely,

A handwritten signature in dark ink, appearing to read 'J. Rowe', is positioned above a horizontal line.

Jack Rowe,
CEO

January 1, 2021

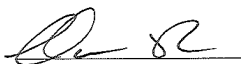
SAFETY & HEALTH POLICY

It is the objective and commitment of Rowe's Construction to ensure the Occupational Health and Safety of their employees by taking all reasonable precautions to protect and save harm against incidents, injuries, and occupational illnesses. We foster and inspire off-the-job Health and Safety to all our employees 24/7, helping to sustain overall well-being.

Our managers and supervisors are responsible and accountable for the promotion and development of employee safety awareness and ensure compliance with the use of safe work practices, procedures, rules, policies.

Every person who is employed by Rowe's Construction has the duty to work safely and promote safe work practices, safe working conditions, and positive attitudes towards incident prevention.

The safety information in this policy does not take precedence over the current Occupational Health and Safety Act & Regulations (O.H. &S.). All employees should be familiar with the O.H. &S. Act and Regulations available at our company offices/shops/active work sites and online.



Owen Rowe
Chief Operating Officer

January 1, 2021



Environmental Policy

Rowe's Construction

25 Studney Dr.	Box 347
Hay River, NT	Ft Simpson, NT
X0E 0R6	X0E 0N0
PH: (867)874-3243	PH: (867)695-3243
FX: (867) 875-6558	FX: (867)-695-2818

Rowe's Construction recognizes environmental protection as one of our guiding principles and a key component of sound business performance. It is important that we all work to the same safety standards, and that we help each other achieve and maintain these standards by planning safety considerations into all our work activities. We are fully committed and will operate in compliance with all relevant Federal, Territorial, Provincial, and Municipal Environmental Legislations, and we will strive to use pollution prevention and environmental best practices in all we do.

Rowe's Construction will:

- Identify, assess and responsibly manage its environmental health & safety risks through comprehensive risk management plans,
- Integrate the consideration of environmental concerns and impacts in all of our decision-making and activities,
- Train, educate and inform our employees about environmental issues that may affect their work,
- Promote environmental awareness among our employees and encourage them to work in an environmentally responsible manner, and ensure all employees, in the course of their duties, act in accordance with the environmental policy,
- Actively promote recycling both internally and amongst its customers and suppliers,
- Where required by legislation or significant health, safety or environmental hazards exist, develop and maintain appropriate emergency and spill response programs and
- Strive to continually improve its environmental performance by periodically reviewing its environmental policy in light of current and planned work.

Owen Rowe - Chief Operating Officer

January 1, 2021



Alcohol and Drug Statement

Attn: All employees, sub-trades, and visitors

Rowe's Construction is proud to have a reputation for hiring quality people and setting high standards of business performance, but that reputation is meaningless unless we succeed in keeping our people and products, the public, and the environment in which we operate safely from harm.

It is widely recognized that stress, fatigue, or being under the influence of Drugs or Alcohol while on the job poses serious safety and health risks, not only for the individual involved but for all those who work with or otherwise come into contact with that individual. The Company believes that maintaining a Drug and Alcohol-free workplace and minimizing work-related accidents are crucial steps to ensuring that our employees, and the families and communities that depend on them, remain safe. This belief has been the foundation of the Company's practice of Zero Tolerance for the manufacture, sale, distribution, purchase, possession, under the influence or transportation of Drugs or Alcohol, too, on or from Company property and our client's premises. Breaches of this statement in terms of disciplinary action may include immediate termination.

As an industry leader, Rowe's Construction has set a goal for its operations of no workplace incidents or injuries. This statement is a component of the Company's efforts to achieve and maintain that goal.

Each of the company, contractors, and employees covered by this statement share a legal and moral duty under Rowe's Construction to adhere to the applicable occupational health and safety legislation to ensure the success of the implementation of this statement for the safety and wellbeing of all. This includes the duty to identify and report all safety issues and breaches of this statement to the company management immediately.

If reasonable cause is evident, the site supervision will stop the worker(s) immediately and proceed with a report to management. The supervisor may ask a co-worker to be present to avoid any here say. If any conflict arises, legal authorities may be called in to assist and investigate. If it is found that there is a breach of this statement, the worker will be removed from the site immediately, and further disciplinary action will be considered.

The key is change – It is important to watch for any significant changes in the person's physical appearance, personality, attitude, or behavior. It is important to keep in mind that if a person has any of these symptoms, it does not necessarily mean that he or she is using drugs. They could be due

to a mental or physical health problem. They might also be due to adolescent development (in the case of teens). Whatever the cause, they may warrant attention, especially if they persist or occur in a cluster.

Physical Signs

- ☐ Inability to sleep, awake at unusual times, unusual laziness.
- ☐ Loss of or increased appetite, changes in eating habits
- ☐ Cold, sweaty palms; shaking hands.
- ☐ Red, watery eyes; pupils larger or smaller than usual
- ☐ Unusual smells on breath, body, or clothes.
- ☐ Extreme hyperactivity; excessive talkativeness.
- ☐ Slowed or staggering walk; poor physical coordination.
- ☐ Needle marks on the lower arm, leg, or bottom of feet.
- ☐ Nausea, vomiting, or excessive sweating.
- ☐ Tremors or shakes of hands, feet, or head.
- ☐ Irregular heartbeat.
- ☐ Runny nose; hacking cough
- ☐ Puffy face, blushing, or paleness
- ☐ Frequent rubbing of the nose
- ☐ Constant twisting of the jaw, back and forth
- ☐ Deterioration of hygiene or physical health

Behavioral Signs

- ☐ Change in overall attitude/personality with no other identifiable cause.
- ☐ Drop-in grades at school or performance at work; skips school or is late for school.
- ☐ Change in activities or hobbies.
- ☐ Chronic dishonesty.
- ☐ Sudden oversensitivity, temper tantrums, or resentful behavior.
- ☐ Difficulty in paying attention; forgetfulness.
- ☐ General lack of motivation, energy, self-esteem, "I don't care" attitude.
- ☐ Change in habits at home, loss of interest in family and family activities.
- ☐ Paranoia
- ☐ Silliness or giddiness.
- ☐ Moodiness, irritability, or nervousness.
- ☐ Excessive need for privacy; unreachable.
- ☐ Secretive or suspicious behavior.
- ☐ Car accidents.
- ☐ Change in personal grooming habits.
- ☐ Possession of drug paraphernalia.
- ☐ Changes in friends; friends are known drug users.
- ☐ Unexplained need for money, stealing money or items
- ☐ Possession of a false ID card
- ☐ Missing prescription pills
- ☐ Complaints of a sore jaw (from teeth grinding during an ecstasy high)
- ☐ Presence of an unusual number of spray cans in the trash

General Signs of Impairment, by Drug/Classification

☐ Marijuana

Glassy, red eyes; loud talking and inappropriate laughter followed by sleepiness; a sweet burnt scent; loss of interest, motivation; weight gain, or loss.

☐ Alcohol

Clumsiness; difficulty walking; slurred speech; tiredness; poor judgment; dilated pupils.

☐ Cocaine, Crack, Meth, and Other Stimulants

Hyperactivity; euphoria; irritability; anxiety; excessive talking followed by depression or excessive sleeping at odd times; go long periods of time without eating or sleeping; dilated pupils; weight loss; dry mouth and nose.

☐ Heroin

Needle marks; sleeping at unusual times; sweating; vomiting; coughing and sniffing; twitching; loss of appetite; contracted pupils; no response of pupils to light.

☐ Depressants (including barbiturates and tranquilizers)

Seems drunk as if from alcohol but without the associated odor of alcohol; difficulty concentrating; clumsiness; poor judgment; slurred speech; sleepiness; and contracted pupils.

☐ Inhalants (glues, aerosols, and vapors)

Watery eyes, impaired vision, memory and thought, secretions from the nose or rashes around the nose and mouth, headaches and nausea, the appearance of intoxication, drowsiness, poor muscle control, anxiety, irritability.

☐ Hallucinogens

Dilated pupils; bizarre and irrational behavior including paranoia, aggression, hallucinations; mood swings; detachment from people; absorption with self or other objects, slurred speech; confusion.

Reasonable Cause:

Includes direct observation of Alcohol and/or Drug possession and/or use on or near the worksite, any of the above mentioned “General Signs of Impairment,” irrational or unusual behavior, reporting to work in an apparent unfit condition (based on but not limited to the appearance of fatigue/drowsiness, erratic behavior, increased interpersonal conflicts, poor coordination, slurred speech, and body odors), repeated errors in work performance, reduced quality of work, excessive absenteeism, complaints about drug or alcohol use in the workplace.

Safety Sensitive:

A position that, if performed in an unsafe manner, can cause direct or indirect and significant damage to property and/or injury to the employee, others around them, the public, and/or the immediate environment (per Canadian Human Rights Commission 2017a).

Where Site Access testing is required for sensitive safety positions, employees will be tested for drugs and/or alcohol with employee consent. Failure to consent to the required testing could result in the employee being denied access to the worksite and removal from the project.

Should alcohol and/or drug testing be required, Rowe's Construction will ensure testing complies with recognized industry standards such as the Construction Owners Association of Alberta A&D Policy Model.

Where drug testing is required, it will include both screening and confirmation tests with a recognized industry standard such as the Construction Owners Association of Alberta (COAA) Alcohol and Drug Policy Model.

Duty to Inquire:

The Canadian Human Rights Commission states that "when an employer observes changes in an employee's attendance, performance or behavior that may indicate possible substance dependence, it triggers the employer's legal obligation to initiate a discussion with the employee about a need for accommodation of a disability. In worksites with safety-sensitive positions, the employer's duty to inquire is also triggered upon receipt of a positive test result."

Bearing in mind the sensitivity of substance dependency, the company will treat all inquiries with the utmost confidentiality and discretion.

Assessment and Return to Work

If a worker has an alcohol and/or drug issue/concern, they are encouraged to report their situation to management promptly. Rowe's will make them aware of independent support services if required. Any worker who presents alcohol and/or drug matter is granted time off to allow a professional assessment/treatment(s) and is welcome back upon successful diagnosis and deemed safe to carry out their assigned duties.

Summary of Responsibilities

To facilitate compliance with and for quick reference by Workers, the following sets out an overview of the responsibilities for Workers.

All Workers are responsible for:

- ☐ Taking responsibility for ensuring their own safety and the safety of others.
- ☐ Reporting Fit for Duty, whether they are working Days On, is Formally On-Call or responding to an After Hours Call Out or otherwise performing work duties, within or outside of regular working hours.
- ☐ Understanding and complying with this Drug and Alcohol Statement as part of their obligation to safely perform their work.

- ☐ Using Medication responsibly and notifying their supervisor in advance of any potential side effects that may impair their ability to work safely.
- ☐ Notifying a supervisor if they believe that any Worker may not be Fit for Duty.
- ☐ Cooperating with an investigation into a violation of this Policy, including any request to submit to Drug and Alcohol testing.

In addition to the responsibilities outlined for Workers, supervisors and managers are responsible for:

- ☐ Understanding this Drug and Alcohol Statement and the associated procedures for monitoring compliance.
- ☐ Reinforcing workplace safety by maintaining a high level of awareness among their workers of the safety risks that arise from the use of Drugs and Alcohol.
- ☐ Being observant for outward indications that a Worker may be impaired at a Company worksite or may have a Substance abuse problem and responding to these in accordance with this statement.
- ☐ Ensuring that any Worker who exhibits outward signs of impairment by Drugs, Alcohol, or Medication is safely removed from the Company Worksite.
- ☐ Ensuring that breaches of this Statement are recorded as an event.

Supervisors are provided training on recognition of impairment and response procedures through this A&D Statement. Additional information can be found on the WSCC website at www.wsc.nt.ca by clicking on the “Health & Safety” section followed by the “Codes of Practice” and then “Cannabis.”


Should alcohol or drug impairment be in question, the RCMP may be called in to investigate and conduct tests (e.g., field sobriety tests, breathalyzers, etc.) that meet with accepted law enforcement & other applicable standards.

Any information/records regarding A&D matters are kept confidential in accordance with the Health & Safety Act and in keeping with the applicable sections of the Privacy of Information Act of the Government of the Northwest Territories and Nunavut.

Should a client have an A&D program which includes testing, Rowe’s Construction is open to following with each worker consenting to terms.

Thank you,

Date: January 1, 2021


Owen Rowe - COO

Rowe's Construction

Return-To-Work Policy

In fulfilling this workplace's commitment to providing a safe and healthy working environment, a Return to Work program has been established for workers who sustain workplace injuries.

Rowe's Construction undertakes to accommodate injured workers through early assistance, rehabilitation, and placement, where possible, to the benefit of the entire workplace. This program provides gradual and consistent rehabilitation to all injured workers.

It is Rowe's Construction's commitment to work collaboratively with injured workers for a safe and timely return to work to their pre-injury position. If this is not possible, the original department will make every effort to place workers in a suitable and meaningful alternative position. In the event that alternative positions are not available within the original department, every reasonable attempt will be made to find a suitable and meaningful position in other departments. All attempts to place the worker in another area must be done, in an appropriate manner, in cooperation with the manager, health care providers, Workers' Compensation Board representatives, and the worker.

Any personal information received from or about the worker will be held in the strictest confidence. Information of a personal nature will be released only if required by law or with the approval of the worker who will specify the nature of any information that may be released and to whom it can be released.

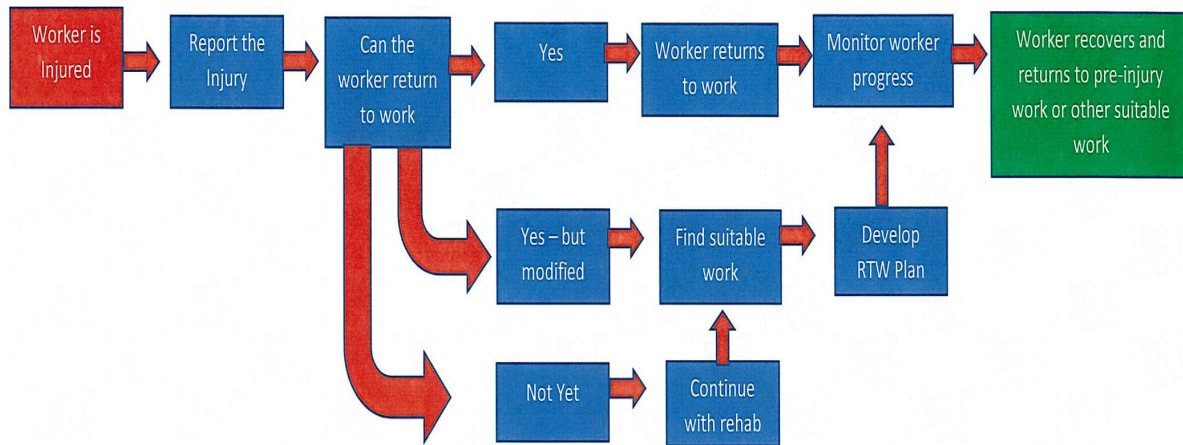
The Return to Work program benefits the employee financially by returning them back to full wages and benefits and psychologically by improving their morale, thus helping recovery.

The Return to Work program benefits the employer by retaining skilled workers, reduces costs of training replacement workers, promotes a positive health and safety culture within the organization, and reduces risks of similar injuries through identifying and controlling hazards.


SIGNED: Owen Rowe – COO

January 1, 2021

Return-To-Work Flowchart



ASSIGNMENT OF RESPONSIBILITY AND ACCOUNTABILITY FOR SAFETY

Also, refer to Tab 1.3(1) (2)(3) of Rowe's Construction
Health/Safety/Environmental Program

Manager

1. Establish a health & safety policy,
2. Provide a safe workplace,
3. Maintain a health & safety program,
4. Ensure proper training of workers,
5. Ensure PPE is available,
6. Ensure hazard assessments and regular inspections are done,
7. Correct unsafe conditions,
8. Provide first aid,
9. Investigate all incidents,
10. Report incidents/injuries to W.C.B. / WSCC as required,
11. Ensure compliance with regulations and
12. Set a good example.

Supervisor/Foreman

1. Promote safety awareness,
2. Establish & record prior to starting: safe work procedures/practices, hazard assessments, site inspections, Emergency Response Plan (ERP) for all jobs, and communicate to everyone involved, all crew to sign off prior to commencing work. Update regularly as needed. Review with relief supervisor/foreman prior to leaving the site,
3. Instruct workers. Observe/ask questions to confirm competency in the safe operation of tools and equipment. **Ensure all workers have been orientated, both site-specific and general company,**
4. Correct unsafe practices/procedures/conditions,
5. Ensure employees arrive fit for duty,
6. Comply and Enforce: company rules, policies, H&S program, practices, procedures, legislated WSCC/OH&S acts/regulations/codes, and environmental protocols,
7. Inspect hazards and establish control measures,
8. Investigate all incidents promptly,
9. Ensure proper maintenance of tools/equipment are carried out,
10. Comply with regulations, client standards,
11. Document hazard assessments, inspections, safety meetings, training; and
12. Set a good example.

Worker

1. Perform work in a safe manner. Use safe work procedures/practices, review hazard assessments, inspections, site postings
2. Report unsafe conditions,
3. Correct unsafe conditions,
4. Report unsafe acts,
5. Report any injury/illness/damage to the supervisor or management immediately. Perform first aid if required,
6. Become familiar and comply with: Company Health & Safety Program, current legislation (WSCC) Acts/Regulations/Codes, Rowe's policies, rules, worksite postings, operator's manuals for tools/equipment, vehicles, labels on equipment-chemicals-powders-aerosol cans-pails, etc.,
7. Make safety suggestions to arrive at work fit and healthy to carry out duties,
8. Participate in safety meetings, inspections, hazard assessments,
9. Always use Personal Protective Equipment (PPE),
10. Complete accident/incident documents within 24 hrs. & return to office,
11. Demonstrate the safe operation and understanding of tools and equipment to your supervisor/foreman prior to use,
12. Perform your Self Performance Self-Assessment (pg. 20) and
13. Set a good example.

Legislative Rights – 3 Basic:

1. **The right to know about hazards** in your workplace and how to deal with them.

- What hazards exist on the worksite? What are the safety procedures that reduce the risk of injury? Where are the emergency supplies? What are the emergency procedures?
- You have the right to know the answers to these questions BEFORE you start working.
- You have a right to know how to do your work safely and properly. Ask if you're unsure and understand fully
- Your supervisor must make sure you know all the hazards on a worksite, and how to deal with them.
- You have the right and the responsibility to receive proper training to manage any risks of getting hurt.

2. **The right to participate** in making your workplace safe.
 - See something unsafe at your workplace? Have suggestions on how to make your workplace safer? Are you concerned about your health and safety or coworkers'? Tell your supervisor. You have the right to participate in ensuring your workplace is safe.
 - At a smaller workplace, you can become the Safety Representative. At a larger workplace, you can join the JOHS Committee as a worker representative.
3. **The right to refuse unsafe work.**
 - Don't do any work if you are not sure how to do it safely and properly.
 - If your work situation puts you or others in unusual danger, you have the right to refuse that work. Tell your supervisor.

COMMON WORKSITE & TASK HAZARDS

Hazard Identification is a critical aspect of any safe work/task plan. It must start upon arrival to work; with equipment & vehicle inspections, site inspections, environmental inspections, checking weather conditions, tool inspections, other surrounding activity, and personnel, ensure proper training of workers, emergency preparedness, use of proper tools/equipment, etc. and continue doing so throughout your day. Identify any hazards and make the necessary corrections to ensure that the site/task is as safe to work as possible. **If you have any questions or concerns, STOP and consult your supervisor, a mistake is not getting clarification or overlooking safety controls/measures for all.**

Common site and task hazards - if not recognized and/or safety measures are not established, these could result in severe injury and/or damage. Your attention is critical. These include, but not limited to:

- Poor: lighting; visibility; ventilation,
- Noise; Dust,
- Vapors from fuels, exhaust, gases, paints, caulking, glues, tar, cleaning agents, propane, gas, diesel,
- Fire/explosion: general use of the product(s) safe handling & storage of flammables, pressurized or dangerous chemicals/powders or gases, paints, aerosol cans, batteries, or general freight,
- Overhead or underground hazards: power lines, propane utility lines, scaffolding, overhead doors, other activity in area, picker and forklift work, tools falling off roofs or work platforms, loader and excavator activity, working with ladders, snow/ice falling from roofs, stacking boxes too high, unstable items on shelves, etc.,
- Confined spaces,

- Work at heights,
- Wildlife (Bears, Wolverine, Bees, etc.),
- Inappropriate use of power tools, hand tools, plug-in outlets,
- Fatigue,
- Distractions - not paying attention to surroundings or task at hand. Engaging / participating in storytelling while others are doing tasks, personal matters, etc.,
- Poor Housekeeping, inappropriate stacking of materials, tripping hazards, clutter, dirty windows, items that should not be stored together or nearby such as heaters, furnaces, electrical outlets, exhaust piping,
- Environmental Conditions - working with environmentally sensitive products such as fuels, antifreeze, etc. can be negative to water sources, habitats, vegetation, spills/leaks, etc. if not handled and/or stored safely,
- Weather (heat exhaustion, cold, windy, overcast, snow, rain, hot sun/UV),
- Ground Conditions (muddy, drainage, loose material, unstable, icy, slopes, soft shoulders, etc.),
- Heavy Equipment and vehicles in operation: general public traffic, backing up, blind spots, congested areas, the position of people, pinch points, operator condition,
- “Hot Work” such as cutting, welding & arc flashes, burning, Herman Nelson portable heaters, camp kitchen hot oil and surfaces, flammables nearby, abrasive cut off saw; grinding, burning fire, etc.,
- Excavation and trench work: collapse, overhead, confined space, air quality, vapors, congestion, access/exit, underground / overhead utilities,
- Repairs on equipment, vehicles & tools: Welding, grinding, saws, projectiles, arc flashes, hot surfaces, equipment stability, stored energy such as hydraulic pumps/systems, inappropriate lockout, inappropriate blocking, or securement!,
- Rushing: No need to rush! keep your mind on the task at hand,
- Compressed air - general use, high pressure,
- Electrical: Inappropriate use/set up of tools, fuse panels, light towers, generators, office appliances, and machinery (fax machines, computers, printers, etc.), demolition, inappropriate lockout,
- Camps: Food allergies, food prep, and storage, utilities, sumps, disposals, permits (propane, water, land, food), hot surfaces,;
- Travel to/from work, travel to remote sites, breakdowns: Be sure to review the **Emergency Preparedness Plan** and plan ahead with your supervisor,
- Shop activities pose many hazards if not controlled, you're not protected, and if you're not paying attention. Don't take chances. Stay clear until safe to approach and do not startle anybody, have eye protection, CSA footwear and reflective markings on always,

- Service or maintenance on tools/equipment not properly LOCKED OUT is a very high hazard, against the law and can result in fatalities,
- Entrapment hazards: coming in contact with moving parts or in positions that limit movement to exits, pinch points, getting between vehicles/equipment/structures,
- Sharp blades/utility knives. Sharp edges of metals and materials,
- Tight or congested areas: if possible, assist someone who is backing up or spotting into proper position. Be sure not to position yourself or allow anybody else to be in between equipment or vehicles and other structures. A simple slip of a clutch, a bump or startle to the operator can cause sudden unwanted movement could result in a severe crush injury, or fatality occurrence could result,
- Hoisting, lifting, and use of chains/slings/shackles all pose high-risk hazards. Be sure a competent employee inspects all rigging prior to use; everyone is to keep clear, see SWP - Rigging and SWP -Proper lifting/hoisting. Staying clear is maintaining a distance of at least double the length of the sling/chain being used. I.e., using a 20-foot chain to hoist or pull an item, everyone should keep a minimum of 40 feet away as a rule.

Perform your visual inspections and Field Level Hazard Assessments (an ongoing process), ask questions, ensure controls are in place prior to starting, get approval from your supervisor, ensure you understand and your comfortable working with and/or around tasks at hand, communicate with others in the area

HAZARD ASSESSMENT

Formal Site/Project Hazard Assessments will be conducted by the site supervisor/foreman, project manager, and/or HSE department and will include the overall project's scope of work. These will be posted at camps or remain with the site supervisor/foreman if there is no office or camp trailer available. You are to review for your safety awareness and provide feedback should you have any concerns or questions. This document is an ongoing process and requires updates should the scope of work change or additions be made, review it frequently!

Job Hazard Assessments (JHA) will be developed by the supervisor/foreman and workers involved in non-routine/uncommon tasks with a moderate to high risk. It involves 1) identifying steps to do the task, 2) identify hazards, 3) establish controls for hazards, review with all crew.

Field Level Hazard Assessments (FLHA) will identify the hazards for the task and the controls to be implemented. The FLHA is completed daily by the worker/crew at the worksite prior to the start of each specific task. The FLHA is updated as new hazards are introduced or a change in the work plan. The FLHA is to be reviewed by any new worker or supervisor coming to the task location. For example, servicing a truck requires one FLHA, and servicing an excavator requires one FLHA, as they are different tasks.

- Both Site/Project Hazard Assessments and Job Hazard Assessments will accurately list and describe the below steps:

(3 basic steps to conducting Hazard Assessments)

- 1) List the tasks & steps to be taken to complete the job/tasks. Break the job down into basic steps, take the time and be thorough,
 - 2) Identify the potential hazards for each step and assess the risk of each hazard. See Hazard checklist below to help,
 - 3) List control measures for the identified hazards. See Safety measures below to assist with controls. (Do not proceed if you cannot establish positive control measures everyone is happy with)
- Now ready to complete the JHA or FLHA form. Review and sign off with all crew members. Ready to perform job/task.

Hazard Checklist, but not limited to:

1. Can I be hit by anything? (gravity, moving parts, sling, etc.)
2. Can I hit or be hurt by anything?
3. Can I be caught in or between anything?
4. Can I strain or overexert myself?
5. Can I slip, trip, or fall?
6. Can I come in contact with something that may harm me or others like heat, gas, fumes, electricity?
7. Can I hurt someone else?
8. Can I damage the environment?

Safety Measures: In order.

- 1st Elimination – Get rid of the danger. Change process.
- 2nd Substitution – Replace the material or the way of doing this job with a Safer one
- 3rd Redesign – Change the environment or way of doing the job
- 4th Separation – Guard or enclose the danger
- 5th Administration – Set up training or proper procedures
- 6th PPE – Use properly fitted and approved PPE when needed. PPE is the last recourse to protect yourself and others

Notes to Hazard Assessments: common items to consider when conducting any hazard assessment: anything of moderate to high risk, ensuring proper tools and equipment available and properly used, proper training of workers verified, applicable SOPs and SWPs to be used, emergency preparedness plan, ground conditions, placement of materials, PPE, positioning of people, location, surrounding activity, traffic, and control, environmentally sensitive, weather, products on-site SDS, vapors, pressure, utilities, etc. Also, see Common task/worksite hazards listed in this handbook

- **Refer to WSCC Code of Practice – Hazard Assessments** from current WSCC or OH&S regulatory bodies. Copies available in company Hazard Control Binder as well.
- Forms for Site/Project Hazard Assessments, JHA and FLHA, can be obtained in the company Hazard Control Binder, don't hesitate to ask your safety department or supervisor for help
- If the scope of work changes, be sure to continually reassess hazards. Ensure control measures are established and update the hazard assessment. Assessing hazards is an ongoing process!!
- Site/Project Hazard Assessments are to be posted in a conspicuous place on-site, or if kept in a crew truck, it must remain on-site and known to everyone on site.
- Job Hazard Assessments or Field Level Hazard Assessments are to be kept on-site where everyone can have access to it. Sometimes this could be the supervisor's or worker's pick-up truck. Field Level Hazard Assessments are kept with personnel/crew who developed and reviewed with workers involved.
- Should personnel change on-site, they must review the applicable hazard Assessments.
- See Tab 3 and 8 of our Company Health and Safety Program for further instruction on Hazard Assessments and additional hazard control measures/procedures.
- **Also, see the next page of Self Performance Self-Assessment in this handbook!!!**

“Accidents/Incidents are Preventable” !!!

Safe-Performance Self-Assessment

Before beginning any activity/task/job

Assess: observe/review the risk(s) for all steps to be taken to complete!

What could go wrong?

What is the worst thing that could happen if something does go wrong?

Analyze: how to reduce the risk!

Do I have all the necessary Training & Knowledge to do this job safely?

Do I have all the proper Tools/Equipment & Personal Protective Equipment? Proper advanced warnings...such as signs, barricades, etc.?
Is weather going to limit visibility or functions? What are my surroundings?

Act: to ensure safe operations!

Take the necessary action to ensure the job is done safely!

Follow written procedures/practices/rules! Establish controls for hazards! Ask for assistance if needed!

Do not proceed unless everything is safe!

For Everyone • Every Day • All the Time

Ask the questions, get everyone involved

Personnel

Different People? Everyone trained? Tired? Sick? 1st aid attendant(s)? Supervisor?

Tools/Equipment

Different people? Different equipment/tools? Maintained and good condition? Fire extinguisher? Spill kit? Proper for the task? Trained in use? Authorized use by Supervisor? Manufactures Operations Manual?

Programs / Procedure?

FLHA completed? SOP, SWP applicable, and reviewed? Manufactures Manual? Air Monitoring? Permit? OH&S reviewed? SDS? TDG documents? Pre-trip inspection checklists? Site inspection? Emergency preparedness – contacts, procedures, supplies location, communication, transport

Environment

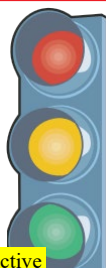
Abnormal weather? Unusual odor? Different shift? Walking/working surfaces? Oil/vapor where it doesn't belong? Wildlife? Remote Area

Communications

Others in the area? Do I know what they are doing?

Do they know what I am doing?

Even with my experience, am I 100% sure I know the proper procedure and legislation?



Hazard Classification and Rating:

All hazards identified during a Hazard Assessment or Inspections will be classified and recorded as follows:

Type “A” Hazard

A condition or work practice(s) and/or procedure with the potential for causing permanent disability, loss of life, significant property, or equipment damage. This hazard requires immediate corrective action. Written control measures required and reviewed with all crew involved. An example would be heavy lifts, picker operations, working at heights, traffic control, vacuum truck operations, high pressure, working in a trench, excavation projects, etc.

Type “B” Hazard

A condition, work practice, and/or procedure with the potential for causing serious disabling injury or property damage but does not present life-threatening hazards. Corrective actions are to be identified and completed prior to commencing. Written control measures required and reviewed with all crew involved. Examples: concrete batching, use of welders/torches/grinders, hot work, use of ladders, heavy equipment operations, etc.

Type “C” Hazard

A condition or work practice and/or procedures that present a risk of minor injury or loss such as housekeeping, missing light bulbs, wet floor, etc., requiring an action plan.

Emergency Response Plan (ERP) will be developed by the site supervisor/foreman for job sites and posted in a location known to all crew. Emergency Response Plan will include the emergency procedures/contacts/location of emergency supplies, list of the 1st Aiders, locations of the closest health center, transportation and communication devices available and reference to Health/Safety and Environment information, etc. The supervisor or foreman will ensure this is available to all on-site, and they review and sign off on – **it is your responsibility to review this upon arrival to work sites and regularly check as crew members or details may change.**

Inspections are an excellent tool with regard to structuring and maintaining a safe work environment. This includes conducting and assisting with the pre-trip inspection of vehicles/equipment, a thorough observation of your work area and surroundings throughout the day. Any concerns are to be addressed promptly. Should you come across a concerned area or observation, STOP and fix it or report it to your supervisor without delay. Written site inspections are conducted upon the

start-up of projects and as the scope of work changes.

At a minimum, planned monthly inspections are conducted of structures: shops, offices, yards, sheds, facilities, etc. These inspections are posted on a specific site for everyone's awareness of conditions. Take the time to become familiar with these inspections. If you have anything to add or have questions, inform your supervisor or safety department. See Tab 8 of the Company Health and Safety Program for further inspection practices.

Communication devices vary on remote sites. One of the following will always be available: Satellite phone, cell phone, landline phone, internet email, VHF radio LADD 1, 2, 3 & Rowe's Company Channel, In-Reach Satellite texting

Tailgate & Safety Meetings

Daily tailgate safety meetings will be conducted on active work sites by the supervisor/foreman and all crew involved. They will be dated, list the scope of work, list topics discussed, and any notes recorded from the crew. All employees are to arrive on time and participate, or you're not permitted to work. Copies will be forwarded to the main office for review and filing.

At minimal monthly safety meetings will be carried out in accordance with our company policy for offices, active work sites, and industrial shop/yard activities. The safety meetings will be conducted to provide ongoing training, awareness, and education. They will be recorded with agenda, date, notes from the crew, signed by all attendees and posted on site. Take the time to review if you were away to stay on top of health and safety reviews, updates, and new items.

Office staff and supervisors will receive monthly Electronic safety meetings to share among crews and post on site.

INCIDENT/ACCIDENT REPORTING

1. Report all incidents – injuries/illnesses/damage/spills **immediately** to your supervisor or management (including minor injuries, bruises, and strains). Incidents are to be reported verbally to your site supervisor/foreman, management, or 1st aid attendant who will arrange for necessary first aid if required or other services needed. You must complete a written incident report within 24 hrs. Or ASAP. If any leave from work is required due to work-related injury/illness or a medical professional's appointment is necessary, you must fill out the required WSCC Return to Work forms as soon as possible (24hrs).
Visits/Appointments to a medical professional due to a work-related injury or illness require you to obtain a Functional Ability or similar form, which outlines any limitations you have as indicated by the medical professional. This form must be issued to your supervisor or safety rep within 24hrs (ASAP), in compliance with regulatory bodies and/or company return to work program.
2. Inform your supervisor prior to leaving the job site because of an illness or injury (if possible, without delaying required medical attention.)
3. Accidents/incidents, where no injuries or damage occur (near misses) or where there is damage to equipment, property, or material must also be reported to your supervisor/foreman immediately. This is to enable an assessment of the situation to prevent future incidence. Completing a written incident report is mandatory within 24hrs
4. Document all factors and events, take pictures:
 - a) Time of Accident,
 - b) What Occurred,
 - c) Any witnesses,
 - d) Extent of injury and/or damage,
 - e) Location of incident (be specific),
 - f) Try to obtain pictures of the undisturbed scene if safe to do so,
 - g) How many people involved,
 - h) What services are required – fire, ambulance, traffic control, RCMP, spill crew,
 - i) Any utilities in concern – power lines, gas lines, propane tanks, fuel storage, chemicals,
 - j) Are there any environmentally sensitive or public area or concerns: water sources, neighborhood, school, parks, etc. and
 - k) Any noticed distractions, weather conditions, visibility.

Forward a report to the main office or HSE within 24hrs or as soon as possible.

All injuries/illness and incidents of a dangerous occurrence and or serious nature will be reported to WSCC or Provincial Occupational Health and Safety regulators without delay and follow up with a written report within 24 hrs. and in compliance with current act/regulations.

EMERGENCY RESPONSE CONTACT'S

Rowe's Construction initial contact list is as follows:

1. For all incidents/accidents – report to your supervisor ASAP. If immediate assistance is required call appropriate authorities promptly for support (RCMP, fire dept., ambulance, Power Company, etc.). If your supervisor is not immediately available, contact the office without delay. Management or Supervisor will inform WSCC or Provincial WCB where applicable.

Hay River 867-874-3243 Toll free 877-874-3243

Ft. Simpson 867-695-3243 Toll free 877-695-3243

Equipment and Vehicles: Rowe's company radio channel, (communication to site supervisor/foreman, co-workers, offices in town limits)

2. **After Hours (24hour)** – Company Emergency 867-874-3243 provides contact information. **9-1-1 is now available in the NT as of November 2019.**

Hay River	Title	Home	Cell
Ron Schaub	General Manager	867-874-4818	867-876-1049
Mark Rowe	H.E. Supervisor	867-875-4455	867-875-8442
Mike Rowe Sr.	Superintendent	867-874-3787	867-875-2616
Jack Rowe	CEO	-	867-875-2812
Colin Steadman	HSE Manager	-	867-875-2805
Gerald Boucher	HSE Compliance	-	867-876-0255
Ashley Rowe	HSE/HR Admin	-	867-875-2518
HSE Office	Ph: 867-874-6110	-	-

Ft. Simpson	Title	Home	Cell
Owen Rowe	COO	-	867-445-8462
John Dempsey	HSE Coordintaor	-	867-695-6742
Len Nadia	Supervisor, HWY	867-695-2849	867-695-6638
Ron Uitvlugt	Bulk Fuel Del.	867-695-6635	867-875-2811
Russel Cable	Shop Foreman	-	709-730-0940

3. Contact appropriate authorities without delay when needed.

	Hay River	Ft. Simpson	Wrigley
Ambulance	867-874-9333	867-695-3232	-
Health Station	867-874-8001	867-695-7000	867-581-3441
RCMP	867-874-1111	867-695-1111	867-695-1111
Fire Department	867-874-2222	867-695-2222	867-581-2222
NWT Power Corp.	867-874-5200	867-695-7122	867-669-3300
Northland Utilities	867-874-6879	-	-
Northwestel Inc	888-423-2333	888-423-2333	888-423-2333

	Ft. Liard	Yellowknife	Ft. Providence
Ambulance	-	867-873-2222	-
Health Station	867-770-4301	867-669-4111	867-699-4311
RCMP	867-770-1111	867-669-1111	867-699-1111
Fire Department	867-770-2222	867-873-2222	867-699-2222
NWT Power Corp.	867-770-4290	867-920-4203	-
Northland Utilities	-	-	800-264-5313
Northwestel Inc	888-423-2333	888-423-2333	888-423-2333

Trout Lake	M – F (8:00 – 5:00)	After Hours	
Health Station	867-206-2838	867-206-2882	
Fire Department	867-206-2800	Band Office	
Fire Department	867-206-2848	Public Works	
Northland Utilities	867-874-6879		

Air Rescue – Utilize GPS Coordinates	
EMT Travel through Stanton Hospital – YK 24 Hrs.	867-765-4050
Great Slave Helicopters (daylight) – Ft Simpson Base	867-695-2326
Great Slave Helicopters (daylight) – YK Base	867-873-2081
Simpson Air (smaller aircraft) – Ft. Simpson	867-695-2505

Prior to performing work in remote areas, contacts are to be verified, especially for medical attention preparedness. Plan to stop in at local Health Station, confirming medical services and availability.

Information for emergencies involving Dangerous Goods – Guidelines

CANUTEC 24 Hour Emergency Number	1-613-996-6666
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Company certified HAZWOPER team members:

	Office	Cell
Lyndon Kipling	-	867-875-7295

Northwest Territories Additional Emergency Numbers

Forest Fires	877-698-3473
Poison Control	800-332-1414
WSCC	800-661-0792
Ground, Inland, and Fresh Water Search and Rescue (1)	867-669-1111
Marine and Air Search and Rescue (2)	800-267-7270
24 Hour Environmental Spill Reporting (3)	867-920-8130
Coast Guard – Marine Emergencies	800-267-7270
Coast Guard – Marine Emergencies VHF Ch 16	Cell Phone *16
Fisheries and Oceans Canada (DFO) Yellowknife	867-669-4900

EMERGENCY PROCEDURES

Planning & awareness is crucial, especially on remote location and travel to and from these areas!

- In the event of an emergency, all employees have the initial responsibility and role to STOP work, seek medical attention (use 1st aid supplies), notify supervisor and/or 1st aid attendant on-site, contact authorities (RCMP, fire dept, ambulance, power company, gas utilities, etc.) if need further and immediate assistance. Assess the situation for further danger, i.e., vapors, insecure ground or equipment, other activity, electrical, public, traffic, ignition sources, wildlife, environment, water sources, etc., secure the area if needed and safe to do so, assist supervisor/manager and responders. Personnel safety is first and foremost, do not put yourself in harm's way. Fire extinguishers and 1st aid kits are available in all Rowe's Construction vehicles. Only trained first aid attendants should attend to serious injuries.

Injury

- A) For serious injuries, these general directions should be followed. If injured involves chemical, gas, refer to SDS (1st aid measures)
 - Seek medical attention, use available 1st aid supplies. Report to supervisor and/or 1st aid attendant on site. Call 911 if need further medical
 - Apply artificial respiration if the patient is not breathing. Use a one-way valve in 1st aid kits.
 - Stop any severe bleeding. Protect yourself and wear rubber gloves. Avoid contact with others blood and body fluids
 - Send someone for help (1st aid attendant, supervisor, ambulance, etc.)
 - Keep the victim lying down; never move if badly injured unless necessary to reach air passage or protect from further harm.
 - Cover with a blanket to prevent shock.
- B) Stay calm and apply only the necessary first aid.
- C) Do not attempt to remove foreign objects from your eye or any other part of the body or allow anyone else to do so, except a doctor or medical professional. If the airflow is obstructed, you will have to remove the object. Contact your site supervisor or 1st aid attendant promptly. Notify the main office.

Note: Darkness, weather, and remote locations prevent air medical response in a lot of areas. Should there be no access for medical air travel due to darkness/weather, we must do our best to treat and stabilize the patient until daylight hours, or safe weather should no other options be available.

Important – There is always a danger in moving an accident victim. This danger must be weighed against the danger associated with the delay in receiving professional medical treatment and the lack of adequate warmth and shelter. Whenever possible use your radio or telephone to seek professional medical advice before making the decision to move the casualty

Fire

- Stay calm, take personal safety measures first, be aware of vapors, wind direction, stay upwind, other flammables in the area
- Sound the alarm and notify supervisor/crew
- Extinguish, only if safe to do so. Use 'PASS' - Pull the pin, Aim at the base of the fire, Squeeze nozzle, Sweep from left to right. Always test extinguisher prior to approaching
- Follow guidelines of applicable SDS (firefighting measures)
- If out of control - evacuate to muster station on work sites or a safety area clearly away, call for help (fire department), conduct a headcount - account for site personnel. Monitor wind. Winds developing or changing direction could start to blow around creating a hazard so stay upwind of vapors
- Promptly secure area, assist responders with any information, i.e., cause, type of combustibles, other potential dangers, anyone unaccounted for
- If in a building: feel the door before opening. If hot, do not open and look for an alternate exit, such as a window. Place wet towel or blanket by the door, fill any tubs or sinks, try and get someone's attention

Spills or Leaks

- Stop work - turn off equipment,
- Assess the situation and notify the supervisor and crew,
- Evacuate upwind/crosswind to muster location or an alternate location (on foot) if a further danger exists,
- Do not approach until the product is identified and you are protected,
- Review applicable SDS (Accidental Release Measures),
- Eliminate ignition sources (be very cautious as fuel vapors, propane is extremely volatile, can settle in low areas),
- Work to contain the spill, ensure you're appropriately protected, and vapors are not a hazard, prevent contaminants from entering water sources and sensitive areas,
- Secure the area and initiate Spill Contingency Plan; Contain, clean up, dispose of in an appropriate area determined by the supervisor and/or Health and Safety department. This is without delay and very time-sensitive,
- The crew will contact the supervisor or management for further actions to be taken and
- All applicable authorities will be notified and accurate records maintained for all spills/leaks.

Vehicle incident, 3rd parties, involved or stranded vehicle

- Follow injury, spill, and/or fire incident procedures as above
- Secure area if safe to do so:
 - set up hazard triangles (ensure enough room for tractor-trailers to stop safely) 300m away minimum, more on corners and hills,
 - turn on hazard lights,
 - call supervisor/foreman and advise if traffic control or extra equipment/crew members are required. If your supervisor/foreman is unavailable, call management at the main office. Should traffic control be required ASAP, ensure that the RCMP are called without delay,
 - If a 3rd party is involved: when the scene is deemed safe and under control: exchange insurance information with the other party, record license plate number, and description of vehicle type, year, color, and how many people in the vehicle, who was driving, any witnesses. If damage over \$1000.00, the RCMP must be contacted. Take no chances and
 - If possible, take pictures of the scene undisturbed.

Call Rowe's Construction for assistance; be ready to give:

- a) Accurate directions,
- b) Nature of incident,
- c) Type of assistance required,
- d) How many people involved or injured?
- e) What services are required - fire, ambulance, traffic control, RCMP, spill crew?
- f) Any utilities in concern - power lines, gas lines, propane tanks, fuel storage, chemicals,
- g) Are there any environmentally sensitive or public area or concerns: water sources, neighborhood, school, parks, etc.,

If no one can be contacted at Rowe's Construction, please call:

- a) Ambulance or Emergency medical travel,
- b) RCMP (they will assist with the overall situation),
- c) Fire department,
- d) Electric company,
- e) Gas utility company and
- f) Hospital or Health Station

Restrict the immediate area of the incident scene – if a further danger exists, promptly clear to a safe area and secure.

Ice Rescue Response

Initial response:

In the event of an accident:

- In the case of an ice failure, approach with extreme caution. No attempt at rescue must be made if it puts the rescuer at risk. **A minimum of 3 responders properly equipped is required to respond to an ice failure rescue with appropriate safety gear.**
- The first priority after aiding the accident victim(s) is to secure the site to ensure that no one, including you, is in danger from further incidents. For example, in the case of an ice failure, warning signs, flares, or barriers must be used to warn others away from the failure (a hole, crack, etc.). In an area where visibility is poor, and traffic is likely, warnings must again be provided to ensure that approaching vehicles do not endanger the people and equipment that are providing assistance at the accident scene.

THINK BEFORE YOU ACT.

Determine if anyone is in immediate danger. A rescue effort may be required if a person is trapped in a vehicle, and the vehicle is in an unstable position. Similarly, an injured person may need immediate medical attention. Deal with life-threatening situations or injuries immediately. At the first opportunity, radio/telephone for assistance.

Provide the following information:

- Location,
- A brief description of the accident,
- Description of injuries,
- Assistance required such as air evacuation, ambulance, road closure, additional personnel or equipment,
- Request that the RCMP be notified,
- Stabilize casualties, being sure to provide as much warmth and shelter as possible,
- Maintain security of the site and stability of victim(s) until assistance arrives, or transport victim(s) to the nearest facility where medical assistance or transportation is available.

Important – There is always a danger in moving an accident victim. This danger must be weighed against the danger associated with the delay in receiving professional medical treatment and the lack of adequate warmth and shelter. Whenever possible, use your radio or telephone to seek professional medical advice before making the decision to move the casualty.

Checklist

- Stop all work activity, **do not panic or rush**; it is critical to analyze the hazards and response steps!
- Secure the area to prevent others from entering/disturbing the area
- Do not proceed alone, contact supervisor ASAP, call 911
- Minimum of 3 responders - Respond with a floater suit, body harness, and 30m of lifeline, have something buoyant to throw, avoid the open area! 2 responders should both have body harness and lifeline
- Profile ice area you are approaching
- If a person(s) come out of the water on to the ice, advise them to roll or crawl (avoid standing or walking)
- Get person(s) to warm area promptly if safe to do so

(Nobody is permitted to comment to anyone regarding emergency situations. Be polite and direct whomever to the site supervisor for accurate information. This could be the media, public, friends)

Incident Trends - occurrences found within the company:

- **Rushing:** No reason to rush whatsoever! Paid by the hour. Plan ahead and stayed focused. Vehicles/Heavy Equipment - not double-checking clearances and/or requesting spotter in tight quarters.
- **Approaching the end of the shift:** Not remaining focused causes harm.
- **Taking shortcuts, inadequate preparation:** Not following rules/practices/procedures/policies, using improper tools/gear/PPE. Failure to conduct or follow: Job Hazard Assessment and/or your Safe Performance Self- Assessment, ensuring hazards are identified and controlled.
- **Between Nov-March:** Colder, darker, slips/trips/falls, slippery driving surfaces, not paying close enough attention. More caution, lower your risk tolerance.
- **Distractions/Disturbing others train of thought:** Participating or engaging others in general stories, telling stories yourself, dealing with personal issues, playing with personal devices/items, etc. while working causes unnecessary distractions, taking away a worker(s) train of thought and focus on duties. Generally, it leads to - forgetting things; attention is reduced slowing production, so employees are now rushing to catch up, etc. Other people are counting on you do your part for overall SAFETY. **Keep your stories, and personnel matters for an off-work time, do not take other's focus away!!**

Thank you in advance, Management

FIRE - PREVENTION AND SAFETY

It is understandable that control of fire hazards is a great concern due to injury, damage, loss of assets, and work. The best time to stop a fire is before it starts. All employees, shall at all times, know the location of fire extinguishers or other such devices and know-how to operate them.

Take all necessary measure to prevent a fire

- Worksites and equipment/vehicles are to be kept clean and free of any situation that may allow a fire to start.
- No flammables are to be located near sources of ignition
- Proper storage, handling, and uses of flammables are critical steps to follow and monitor. Refer and follow applicable SDS and SWP for the use of cleaning solvents and flammables
- Ensure no clutter gathers as this is a high-risk situation that may cover and create potential fire hazards.
- Keep flammables to a minimum on-site or in storage areas.
- Do not overload circuit breakers.
- Nobody is to tamper with any electrical or mechanical items unless you are qualified and authorized by supervisors.
- No smoking within 10m of flammables.
- Fire extinguishers must also be easily accessible (i.e., don't set your toolbox in front of it or pack stuff around it). Ensure it is in good condition and secure. Gauge is to be in the green, ensure the hose is not plugged, no physical damage, and the pin is in place. All fire extinguishers are to be certified annually and inspected monthly - review the tag. If not tagged let your supervisor or safety department know ASAP
- For any use of cutting torches, cut off saws, tiger torches, Herman Nelsons, welding, grinding, propane, fuel and gas handling/storage or use of, etc. Refer to SOP #016 'Hot Work' for steps to be taken to prevent the chance of a fire! Also, refer to SWP #002 for the use of cleaning solvents and flammables
- Hot exhaust is the potential for fire. Do not park on or near vegetation or other material that may ignite, especially on the side of HWY's or ditches; when hot, let cool down. Vehicles/equipment that regenerates can become extremely hot 800 C +
- Use non-flammable products where possible
- Heat and open containers can cause the release of more potential vapors resulting in a higher risk environment for fire/explosion. Keep lids on products and take the necessary step to protect from ignition sources, keep 10m from ignition sources!
- Informal inspections are to be conducted by all employees throughout their day monitoring for potential fire danger and

correcting it. Formal inspections will also be conducted to ensure compliance.

- If you see smoke, smell anything unfamiliar or feel the heat "STOP Promptly " and investigate. Notify someone as soon as possible.
- On unfamiliar sites, take the time to consult with the site supervisor, foreman, or safety for overall safety awareness and any potential restricted areas.
- Keep exits clear of obstructions.
- Only smoke in designated areas.
- Have an established alarm system (air horn).
- Clean it up and put things away properly.
- Other company references for fire prevention:
 - SOP#016 - Hot Work
 - SOP#004 & #007 - Fueling
 - SWP#035 - Abrasive cut off saw
 - SWP#002 - Use of cleaning solvents and flammables
 - SWP#010 - Welding/cutting/burning
 - SWP#005 & #006 - Grinding and use of portable grinders
 - SWP#015 - General use of Propane
 - SWP#033 - Heating of Tar Oil and Transfer

Fire and Extinguisher Classes / Types:

Class A - wood, paper, rags, rubbish, etc. Use water or soda acid extinguishers.

Class B - flammable liquids oil and grease. Use ABC units, dry chemical, foam, or CO2.

Class C - electrical equipment. Use carbon dioxide and dry chemical extinguishers.

Class D - exotic metals. Phosphate, magnesium.

Class K - for kitchens, hot cooking oil. Silver in color.

Majority of fire extinguishers within in Rowe's Constructions operations are class ABC

Fire extinguishers are located in offices, shops, throughout camps, vehicles and heavy equipment, generators, welding areas, fuel storage, near hot work activities, and flammable storage. Should you not find a fire extinguisher in the vehicle, equipment, or on-site report it to your immediate supervisor or safety department promptly so it can be replaced.

OPERATING YOUR EXTINGUISHER



PULL THE PIN



**AIM AT THE BASE
OF THE FIRE**



SQUEEZE THE LEVER



**SWEEP FROM SIDE
TO SIDE**

IN ADDITION

- TEST EXTINGUISHER PRIOR TO APPROACHING FIRE.
- KEEP LOW & APPROACH WITH WIND AT YOUR BACK.
- BACK AWAY, WATCHING FOR REKINDLE.

COMPANY GENERAL RULES / SAFE PROCEDURES

“NO JOB IS SO URGENT THAT IT CANNOT BE PERFORMED SAFELY!!”

1. Being under the influence or in possession of alcohol or impairment drugs on company premises or any company job site is strictly prohibited and may be cause for immediate discipline. Law authorities may be contacted to assist.
2. No employees, sub-contractors, or visitors are to engage in fighting, horseplay, practical jokes, scuffling, discrimination, harassment, or other behavior that might create or constitute a hazard to him/her or others.
3. Theft, vandalism, or any other abuse or misuse of company/client property is prohibited and may be cause for immediate dismissal.
4. Running is not permitted anywhere, except in the case of an emergency.
5. All incidents that result in injury/illness or damage are to be reported to your supervisor or management immediately. Use available 1st aid supplies. You must complete a written incident report and hand in without delay. Should any visit to a medical professional be required, you must obtain a functional ability form indicating any restriction(s) you have and provide to your supervisor or safety department immediately so modified duties can be reviewed if required as per the RTW program. (An initial verbal notification to your supervisor is required immediately but follow up in writing is mandatory).
6. While entering/exiting equipment or use of ladders, 3- point contact is required at all times.
7. Prior to approaching or working near equipment: Use the VHF radio and let the operator know you want to approach. Always be in the line of sight of the operator. Wait for the operator's instructions, and for them to ground attachments, only then proceed to approach.
8. Safety glasses and face shields shall be worn when concrete breaking, metal chipping, welding, grinding, and other operations where eye and face protection is required. Safety goggles are to be used when dealing with liquids or small particles such as dirt, dust, sand, hazardous liquids. Face shields and goggles are not adequate for high impact, so safety glasses must be worn in addition to a face shield. **Safety glasses are a minimum requirement for all services and maintenance duties - transfer of fuels, use of power & hand tools, pressure washing, etc**

9. PPE and Clothing shall be appropriate for the duties being performed. Long pants, a shirt, reflective clothing, safety glasses, and sturdy CSA approved work boots are the minimum requirements for all active work sites (not applicable in offices). No tank tops or running shoes. Long hair must be tied back. No loose clothing around moving tools or equipment. Ensure all PPE is clean and sanitary, inspect for defects, do not alter and/or render, ensure proper fit. Return for replacement when defected. Bring and wear to all sites - Reflective clothing, hard hat, CSA footwear, and safety glasses. We are surrounded by potential eye hazards
10. Hard hats are to be worn as per the Occupational Health and Safety Regulations, where any possible overhead hazards or side-swing on-site, flying particles, i.e., flaggers, crusher operations, clients' requirements, when crews are working above, etc.; or by Safety or Supervisor direction. Do not remove the foam liner in hard hats!
11. All work shall be carried out in accordance with appropriate safe work practices, procedures, legislative acts/regulations/codes, and your supervisor's or safety representative's direction.
12. Every worker shall keep his/her work area neat, clean, and orderly.
13. Operate only tools and equipment you are properly trained in and have demonstrated to your supervisor or foreman. Verification includes but not limited to start/stop procedures, breaks, safety guards, lights, knowledge of gauges, windshield wipers, horns, proper bits or blades, and the proper installation (i.e., grinders, cut off saw, auger, skill saw, etc.). **Review operators' manual, and any applicable SOP, SWP, and OH&S legislation to ensure compliance and your safety.**
14. No worker shall remove, alter, impair or render any equipment, tools or PPE effective safeguards provided for their protection
15. All electrical tools/equipment shall be grounded.
16. Compressed gas or liquid cylinders (pressurized) shall be secured in an upright position at all times and labeled if contents are classed as a dangerous material or WHMIS hazardous products. I.e., Propane, oxygen, acetylene, etc.
17. Riding on any equipment is prohibited. No person shall ride any hook, hoist, bucket, forks, ladder, or other material handling equipment, which is used strictly for handling material and not specifically designed to carry riders.
18. Welding, cutting, and burning operations shall be carried out only by authorized personnel with appropriate individual protective equipment. Follow applicable SWP's, Hot Work SOP, and OH&S regulations. Do not leave hot material unattended and have back up fire extinguishers readily available. Hot work includes the use of

portable heaters.

19. Hand tools shall not be used for any purpose other than that intended for. Only those tools that are in good repair, with all guards and safety devices in place, shall be used. Inspect prior to each use. Tag “out of service” any defective tools/equipment and report to your supervisor without delay. Tools must be kept in proper storage. Review the company SWPs for hand tools, use of sharp blades, defective tools, grinding, step ladder,
20. Only authorized personnel shall operate power tools, with guards furnished by the manufacturer in place and functioning properly. As with hand tools, all power tools shall be inspected prior to using and not used if deemed unsafe. Vibration can be a hazard with power tools if not handled correctly and without appropriate breaks, proper ergonomics, and hand protection. Be sure to review and follow the operations manual from the manufacturer. Review and follow SWP for Power Tool use and any applicable SOPs.
21. Check-in and out with the supervisor on each shift. Do not leave the site without letting the supervisor know.
22. Harassment, Violence, and Discrimination are very serious offenses. Examples include, but are not limited to, sex, age, physical attributes, personal issues, religion, ethnic background, etc. Any matters of these situations are investigated fully. A complaint is made in writing and presented to your supervisor, where management will be consulted. Do all you can to safely remove yourself from an occurrence, document any factors you can think of.
23. Smoking is prohibited in any enclosed worksite, including equipment/vehicles, and within a 5-meter radius of all entrances/exits as per OH&S act, fines are subject to the worker. Rowe’s will not purchase cigarettes for any employee.
24. Follow this employee’s handbook and have it readily available.
25. Report any unsafe work conditions or practices to your supervisor/foreman or safety rep immediately. Take no chances; if in question, STOP and report.
26. Only trained workers shall inspect all lifting or rigging gear for defects and ensure they are capable of handling the strain it will be subject to prior to each use. See SWP for Rigging and SWP Proper Lifting Practices-hoisting. Always ensure nobody is in close proximity when any strain is on gear. Stay clear (double the length of chain/sling being used) and always double-check; broken lines, slings, chains, cables, hooks, shackles as these can cause serious injury and death if not handled properly. Even if and when pulling someone stuck in a ditch or out of a soft spot, check all your equipment first.
27. All workers shall inspect electrical cords for defects prior to use.

- Black tape is not a sufficient splice or repair for electrical cords
28. If you arrive at a job site, do not wander around. Ask for the supervisor/foreman or client's rep. for the safety briefing, etc. Be Patient.
 29. All workers are to arrive at work on time, fit, and healthy enough to carry out duties. If under medication, it is your responsibility to consult with your doctor or medical professional and ensure no side effects will affect your performance. This is serious as you do not want to put yourself or others in harm's way!
 30. If you have difficulty with any written documents or terminology, please notify your supervisor or safety so another arrangement can be made.
 31. No pets are permitted on-site or in company vehicles.
 32. Upon arrival to active work sites: Know who the supervisor/foreman is and review the site **Emergency Response Plan (ERP)** which will cover emergency response information, the location of emergency supplies, transportation, and contact numbers, identify who the 1st aid attendants are, location of legislation and other references regarding health/safety/environment. Sign your name and date after review. Monitor regularly for updates throughout the project. Review site posting for site-specific rules, guidelines, practices, etc. and general health, safety, & environmental awareness.
 33. The use of company property is not acceptable for personal use unless authorized by senior management.
 34. Cell phone use is recognized as a hazardous distraction when used unnecessarily. If you must use your cell phone, remove yourself from work activity completely. Some of our clients do not approve the use or permit cell phones on worksites, and you must comply.
 35. No cell phone use when near flammables. i.e., fueling, handling flammables.
 36. Failure to comply: With company rules/procedures and other health & safety direction, guidelines, site postings, written procedures and practices such as SOP and SWP, WSCC/OH&S act/regulations/codes, environmental protocols, operator's manuals for equipment/tools, etc. may result in disciplinary action including termination. Everyone has a roll in the health and safety of others at all times. The above are critical steps in preparing your daily tasks and participating in everyone's safety
 37. Only trades are permitted to repair or service electrical, hydraulics, air or stored energy on tools and equipment
 38. Do not rush or take shortcuts!! Use proper tools/equipment, stay focused on the task at hand
 39. Do not position yourself between moving equipment/vehicles and

other structures i.e., when spotting/signaling someone backing up if you're positioned between a solid wall or other equipment, this is the potential of getting crushed! Just takes a miss hap of the foot slipping on clutch or accelerator pedal, or bump of hydraulic control lever can put one in serious harm!

VEHICLE - RULES / PROCEDURES

1. Backup parking at all times on-site/yards, so long as safe to do so. If you have to walk a further distance to do this safely, then do so. Use pull-through parking whenever practicable.
2. A current valid driver's license is mandatory for anyone operating a Rowe's Construction vehicle. Failure to comply with this regulation may be grounds for immediate dismissal. Driver abstract checks will be made randomly to ensure compliance.
3. Anyone in possession or under the influence of alcohol or illegal drugs while operating a Rowe's Construction vehicle may be dismissed immediately. Authorities will be called to investigate.
4. Always ensure that the vehicle you are operating is clean and in proper driving condition. Items such as brakes, steering, suspension, tires, and lights must be in good working order, clean windshields, and mirrors. **Perform the pre-trip inspection checklist and review prior ones.** Report any defects to maintenance and supervisor immediately. If deemed unsafe, then place a 'Do not operate' tag on the steering wheel with a brief description to notify others. Always review prior pre-trip inspections as there may be items to follow-up with or that you should be aware of.
5. Drive with headlights and seatbelts on at all times. Passengers are required to wear seatbelts.
6. Be sure a valid registration and insurance card are in vehicles at all times.
7. Make sure you have your driver's license with you when driving and any other license, permit, documentation, manifests, and TDG certification, or any other certification required.
8. Federal, Territorial, Provincial, Municipal, and construction site signage and traffic regulations must be obeyed when operating Rowe's Construction vehicles. Any neglect of these may result in termination. Fines are subject to the operator.
9. No one other than Rowe's Construction employees shall operate company vehicles, except in emergency situations.
10. Never carry more passengers than what the vehicle is designed for. Riding in the back of pickups is prohibited.
11. No passengers other than Rowe's Construction employees or approved

visitors are permitted in vehicles as insurance does not cover others.

12. Company vehicles are only used for conducting business. After hour use is prohibited and grounds for dismissal.
13. No pets or animals are allowed in any company vehicle at any time.
14. Do not back up in blind spots. If you can't clearly see behind you, then stop and check for clearance. Request a spotter if needed.
15. If parked on a hill, be sure to block your wheel and put on the emergency brake.
16. Conduct a walk around each time you return to your vehicle, just so you are aware of any changes/damages that may have occurred while you were away or if something/someone is underneath or near.
17. If you have to stop on the HWY or any roadway, put your hazard light/beacon on. If stranded on HWY be sure to place your hazard triangles well in advance to warn others, 300m behind is enough room for heavy tractor-trailers to slow down safely
18. Cell phone use/texting/portable music devices are NOT allowed while operating any vehicle; earphone usage is not permitted. Must abide by and practice defensive driving legislation for the overall safety of yourself and others. No use of cell phones on customers/client's property unless directly authorized by them.
19. Do not boost battery unless you have been trained. Must refer to the manufacturer manual. Improper hookups can damage electrical and/or cause fire/explosion causing severe and permanent injury.
20. Refer to the operator's manual for servicing, maintenance, boosting practices, tire change, installations, etc.
21. Always ensure adequate ventilation when the vehicle is running. Carbon monoxide kills. Do not allow a vehicle or any other exhaust to blow near any building/camp/sheds entrance/exits/vents/windows.
22. Ensure that all items within the vehicle, cargo box, and trailer (if equipped) are secure from moving while in transit. Check that your anchor points and slings/chains/ratchet straps are in good working order and can handle the appropriate weight. Ensure no loose items can blow out or knock into others. This includes heavy snow, as well. Ensure you have enough secure points and attachments to secure the load. Loose items in the cab can be dangerous, check to make sure no loose items are on the dash, under the seat, by the throttle or brake pedals, etc. Always know what you're carrying and any special needs.
23. All vehicles are to be serviced every 250hrs or 5000km or as per manufacturer if different. Always know when the next service is due and record on your pre-trip inspection. Inform your supervisor and maintenance when service is approaching, so schedules are

not interrupted unexpectedly. If you are not sure of the next service due, then ask maintenance or your supervisor. The last service is usually recorded on the service tag or oil filter and the pre-trip. Keep in mind that some vehicles do not have hour meters on them and idle time in the cold months will usually reach 250 hrs. before the 5000km is reached, it is important to record the number of h

24. After a tire has been changed, the lug nuts require re-torque (tightened) 150km afterward. If you can't get a re-torque at 150km, be sure to stop and check the lug nuts to make sure they are not loose and again after 300 km until they are properly re-torqued. Feel the tire and rim for temperature. A hot tire or rim could indicate low pressure and or loosened nut(s). When at a shop, have them checked with a torque wrench. If you have concerns call your supervisor, and they will arrange someone to come out and check.
25. Vehicles registered at and over 4500kg are considered commercial, and operators must maintain a pre-trip checklist, logbook, abide by hours of service, report into scale terminals. Follow NSC
26. If pulling a utility trailer, ensure it is hooked up correctly, plated, and currently registered. Check that tires, brakes, lights, and the suspension are in good order and functioning properly. Ensure that the vehicle towing the trailer is capable of handling the weight. Do not overload. Ensure all items are firmly secured to avoid unwanted movement. Any overhanging items are marked by flagging, or other means to clearly identify. **Always refer to the vehicle's manufacturer manual for further instructions on hooking up and towing a trailer.** Stop periodically (every 200km's) to check your load. Request a spotter for navigation in any blind spots or tight quarters. Check with maintenance to ensure the trailer is ready. Slow down sooner than usual for corners/hills/soft and slippery areas as the extra weight will require additional braking distance.
27. Seat belts are required for both drivers and passengers.
28. All vehicle incidents are reportable to your supervisor or management immediately.
29. Do not travel in dust, snow dust, or conditions which limit visibility such as fog, heavy snow, take your time.

Ensure the fire extinguisher is fully charged, secure, good condition, tagged, and annually inspected. The 1st Aid Kit is stocked and clean. Be sure you have emergency contact numbers, procedures are in a vehicle and you have mobile numbers. A pre-trip inspection checklist is to be completed daily!!

HEAVY EQUIPMENT - RULES / PROCEDURES

1. Before mounting equipment, **perform a pre-trip inspection checklist**. Review prior pre-trip inspection just in case there are items to follow-up with or conditions you should be aware of. Report any defects immediately to your supervisor and, if deemed unsafe, do not proceed. Install a "Do Not Operate" on ignition with a brief description, so others are made aware.
2. When mounting or dismounting equipment, always face equipment, make sure both hands and footwear are free from grease/oils/ice/mud and dirt. Ensure that 3-point contact is maintained when getting on and off equipment as slips/trips/falls may result in serious injury.
3. Operators shall go through the start-up and shut down procedures as described by their supervisor and review of the equipment operator's manual to ensure proper steps are taken for the safe operation. Do not proceed if in question.
4. Operators are expected to know and work within the rated capacities of the machine. **DO NOT OPERATE IF YOU DO NOT KNOW!** How much can this lift, limits of height extension, balance, and ground stability, how much does the load weigh, your weight, equipment, etc.? Again, refer to manufacturer operating manual.
5. Operate equipment with lights and beacon on at all times.
6. Equipment fitted with seat belts requires mandatory to use at all times, including passengers. Some exceptions may apply to ice crossing construction.
7. All heavy equipment must be operated with extreme caution, especially when near power lines or underground utilities. Have the owner of land identify underground utilities, do not proceed until all underground utilities have been identified and marked. Striking utilities can result in severe injury or death. When working near power lines/poles or utilities, a Hazard Assessment must be completed by operator and crew members.
8. Do not operate equipment within 10 feet (3m) of energized or live wires without direct supervision and contacting the power company. If in doubt, consult your supervisor. If raining, extend the distance by at least 6feet (2m) or postpone until better conditions. Be observant of possible swing movements such as willows/trees, etc. Spotter required in tight areas or near power.
9. Read and obey operator-warning decals placed on the equipment.
10. Backing up without a clear view is prohibited.
Always back up with extreme caution and request a spotter if in question. If no backup alarm ' honk horn twice, then put in gear, and slowly proceed. Always do a walk around, check before backing up, or hooking up to a trailer.
11. Obey speed limits and posted signs.
12. For greater visibility, attempt to make left-hand turns (forward and reverse) at all possible times.

13. When parking, 3 feet+ must be maintained between heavy haul trucks, trailers, and equipment.
14. Nobody shall be in or on the machine during servicing/repairs. Proceed with servicing /repairs only with all safeties on and engine not running unless necessary. **LOCKOUT** is required by each service for all mechanical personnel involved. See company SOP and current OH&S legislation for lockout procedures. Unwanted startup or movement must be prevented. Verify isolation before proceeding with service or repairs. Each person working on must have their lockout on. The locks can only be removed by the lock owner
15. When leaving a machine, engage all safety brakes and lower all raised components. Same procedure for when anybody is approaching, ensure all attachments are grounded. **TURN OFF MASTER SWITCH.**
16. Do not ride on machines that are not equipped to carry passengers.
17. Always be aware of and maintain defensive driving techniques.
18. Do a walk around each time you return to your vehicle just so you're aware of any changes/damages that may have occurred while you were away or if something/someone is underneath or near.
19. Cell phone use/texting/portable music devices are not permitted while operating any vehicle. Earphone usage is not permitted. Operators must abide by and practice defensive driving legislation for the overall safety of yourself and others.
20. Do not boost battery unless you have been trained. Must refer to the manufacturer manual. Improper hookups can damage electrical and or cause fire/explosion causing severe and permanent injury.
21. Refer to the operator's manual for servicing, maintenance, boosting practices, tire change, installations, etc.
22. Always ensure adequate ventilation when equipment is running. Carbon monoxide kills.
23. Ensure fire extinguishers are charged, good condition and 1st aid kits are stocked. Have a supply of oil/fuel absorbent pads and garbage bags on equipment for any leaks or spills.
24. Report any deficiencies to your immediate supervisor and maintenance without delay. If deemed unsafe, be sure to place a 'Do not operate' tag on the steering wheel or ignition to warn others.
25. No smoking in equipment - WSCC law fines are issued to operators.
26. Clean equipment at the end of your task (daily). Take all garbage out, clean tracks, clean windows, mirrors, and sweep the floor.
27. Snow removal with loader, plow, or other heavy equipment, always inspect the area and any hill or piles before moving it or piling on it as children or animals could be near or inside a hole.
28. During cold months: Drain all air tanks, water pumps, fuel up before parking in the shop or warm areas to reduce the chance of condensation in tanks.
29. Shut off master switch when done with equipment.
30. Always ensure your load is secure. Proper chains/boomers, slings, attachment clevises, anchor points, and ratchets straps are to be in good order or do not use. When loading or offloading shacks, be sure

to use deck pins. Do not drop shack! Monitor your load security and often check, especially when traveling on rough terrain.

31. Cover windows on equipment being hauled.
32. Check your radio operations.
33. Parking/stopping on hills: Track equipment, ground all attachments. Wheel equipment, ground attachments, and block wheels. Set emergency brake on all.
34. Look in blind spots prior to moving and be certain it's safe to proceed.
35. Look behind you before putting equipment into gear.
36. All heavy equipment is to be serviced every 250hrs. Always know when the next service is due and record on your pre-trip inspection. Inform your supervisor and maintenance when service is approaching, so schedules are not interrupted unexpectedly. If you're not sure of the next service due, then ask maintenance or your supervisor. The last service is usually indicated on a service tag or filters (oil, fuel, air, hyd) and on the pre-trip inspection.
37. Tire Change, after a tire, has been changed; the lug nuts require a re-torque (tightened) 150km afterward. If you can't get a re-torque at 150km, be sure to stop and check the lug nuts to make sure they are not loose and again after 300km until they are properly re-torqued. Feel the tire and rim for temperature. A hot tire or rim could indicate low pressure and or loosened nut(s). When at a shop, have them checked with a torque wrench. If you have concerns call your supervisor, and they will arrange someone to come out and check.
38. All class 1, class 3, and personnel operating vehicles over 4500kg are required to follow the National Safety Code (NSC).
39. Know when your next service is due. Ensure fire extinguisher(s) are fully charged, secure, in good condition, tagged, and annually inspected. Check that the 1st Aid Kit is stocked and clean. Be sure you have emergency procedures/contact numbers/communication are available.
40. Hoisting equipment: Pickers, forklifts, backhoes, end dumps, gravel boxes, etc. Be sure to inspect the area for overhead hazards such as power lines. Ask for a spotter if working within (3m) and consult with the power company. Do not position yourself under any suspended load or its swing potential at any time.
41. Prior to dumping loads, ensure you are on level ground, and airbags are dropped. Watch your load, if nothing comes out and on 2nd stage STOP and check as the load may be stuck. Do not use your hands to open and close the end gate!! See SWP #026 Hauling of aggregate.
42. If you can't see what you are doing, STOP and request a spotter. Always be aware of the swing radius of your equipment, 100% positive placement of forklift, bucket, and attachments

RULES & REGULATIONS for CAMPS & ACCOMMODATIONS PROVIDED by ROWE'S CONSTRUCTION

This camp and/or accommodation is your home away from home. These rules and regulations are in place for the well-being of everyone living at the camp and will be enforced at all times. **Failure to comply with these rules and regulations may result in removal from camp and possible termination of employment.**

1. When you check into a camp/accommodation check your room, if it is not satisfactory and items are not in working order, you need to let the camp manager or your supervisor know.
2. Residents of the camp/accommodations are responsible for the condition of their room and will be held accountable for any damages beyond normal wear and tear. Actions will be taken, if any damage is found, and are at the sole discretion of Rowe's Construction and any repair costs will be the responsibility of the resident.
3. **The camp/accommodations are non-smoking facilities.** Smoking is only permitted in designated smoking areas and is a rule of Rowe's Construction. Smoking outside of a designated area will result in an indefinite site suspension; in addition, anyone found smoking in their room will incur a cleaning charge of \$500.00. This includes ceremonial smoking.
4. Residents checking out must remove all personal items unless prior arrangements have been made. Rowe's Construction accepts no responsibility for any lost, damaged, or stolen items stored in rooms or in the designated storage areas. Please do not store any valuables in our storage areas.
5. Most camps/accommodations camp areas are equipped with washers and dryers. Machines are for street clothes only. It is prohibited to wash coveralls and or heavily soiled or greasy clothing in the machines provided. Leaving items unattended is at the owner's risk.
6. The following is prohibited in the dining/lunch areas: dirty work clothes/footwear, coveralls/overalls, and/or heavily soiled clothing.
7. **No abusive or offensive behavior (verbal or physical) is tolerated against any employees, public, or other residents/visitors on the facility.** Should you have any complaints or concerns, please discuss it with the camp manager or your supervisor.
8. Willful damage/unruly conduct/fighting/violence/theft will not be tolerated and will be dealt with immediately.

9. Use and/or storage of flammable or combustible materials in the camp accommodation are strictly prohibited. Using flammable solvents to clean clothing is prohibited.
10. Residents found to be under the influence of alcohol or behavior-altering drugs will not be permitted in the camp/accommodation and may be suspended or terminated.
11. Possession of dangerous goods, firearms, weapons, or any alcohol or any illegal substances in the camp/accommodation is strictly forbidden.
12. No person shall tamper with fire prevention or rescue equipment. Breach of this rule will result in immediate action, which can include criminal charges per articles 380 & 387 of the Criminal Code of Canada.
13. Parking is **ONLY** permitted in designated areas, and Rowe's Construction back in policy must be adhered to.
14. If you have any questions, comments, or concerns about the service at the camp/accommodations, please discuss them with your supervisor or camp manager. If you have a maintenance issue, please bring the matter to the camp manager and or supervisor.
15. You must be clothed while on site. No nudity permitted other than your private room. Shirts are required when you can be in the eye of others.

TRAVEL & JOURNEY MANAGEMENT

- Do not travel without letting your supervisor know and coordinate a 'check-in' time. It can be many hours on some highways prior to anyone showing up, could be days if the weather prevents travel and emergency response.
- Ensure you have a spare tire, jack, and tools. Consult with your supervisor or dispatch should you need tire chains.
- Ensure you bring extra food, water and have warm clothing for winter - gloves, toque, winter boots, etc. Layered clothing helps in hot and cold conditions
- Be sure you have the required fuel for the trip.
- Matches, dry kindling, ax, candles (at least 3 candles) should be carried on any trips over 5 km from dispatch. In the event, you have to burn candles, ensure you have adequate fresh air, open the window, be aware of exhaust fumes as inhalation can cause serious illness or death.
- Check operation of company radio prior to leaving the site.
- If you require medication or special needs, be sure to carry extra.
- Prepare for the unexpected. Flood, fire/smoke, fog, HWY wash out, whiteout conditions, etc. are of concern but not limited to,
- Check your weather conditions prior to leaving. Reschedule if you feel at risk. Travel in a group where and when possible.
- Follow applicable SWP for working in cold weather, working in hot weather and whiteout conditions
- **Do not enter any frozen crossing without prior approval from senior management or Senior Government officials. You must confirm that ice is profiled to accept the weight of equipment/vehicle and loaded materials, etc. and safe area is clearly identified. NO EXCEPTIONS**

DISCIPLINARY ACTION

Health, Safety, and Environmental require constant day-to-day attention from everyone. It is for this reason that each employee/sub-contractor/visitor must follow safety rules, policies, procedures/practices, guidelines, legislation, all site postings, and stay alert

It is Rowe's Construction philosophy that all employees are trained properly in health & safety procedures, and employees are expected to follow and adhere to all aspects of our Safety & Health Program. The close observance of all Federal, provincial, state, local, and client rules and regulations will be monitored at all times.

If there is an infraction of these rules, policies, guidelines, regulations, or the Safety Program, disciplinary action will be taken. This includes verbal & written warnings, suspension, removal from the site or termination.

Depending on the violation severity, one can be terminated without prior warnings. Violation forms will be used to record such events.

WORKPLACE HAZARDOUS MATERIAL INFORMATION SYSTEM (WHMIS)

The Workplace Hazardous Material Information System is a nationwide legislated system to provide information on hazardous products used/stored in the workplace. Examples of hazardous products; paint, pressure-treated wood, cleaning solution, diesel, antifreeze, compressed cylinders, propane, gasoline, battery acid, glues, solvents, powders, spray insulation, etc.

WHMIS 2015 recognizes the interests of workers, employers, suppliers, and regulators balancing the worker's right-to-know with industry's right to protect. Exposure to hazardous products can cause short-term health effects such as irritation, burns, and sensitization, or long-term effects such as heart ailments, kidney/lung damage, and/or cancer. Some materials can also contribute to fires, explosions and other accidents when improperly used, stored, or handled. WHMIS is essentially a system of information with three key elements:

1. **LABELS** – are required on hazardous products and their containers, which alert workers to the danger of products and basic safety precautions. There are 2 types of labels: Supplier Label and Workplace Label.
2. **SAFETY DATA SHEET (SDS)** – Technical bulletins that provide detailed hazard identification, safe handling/usage/storage measures, emergency guidelines for spills/fire/injury, and precautionary information on the product. These are available at our office and on remote sites. No matter how comfortable you are with a product, you are responsible for reviewing the SDS and knowing where the SDS information is located.
3. **WORKER EDUCATION** – Rowe's Construction will strive to ensure that all hazardous products used/stored on our projects are labeled and will, at the same time, provide ongoing instruction and training regarding the safe work with these products. You, as a worker also have responsibilities in this education process:
 - Receive, learn, and abide by information on hazardous products through the WHMIS program. Certification is valid for 3year with annual review through the employee handbook, site postings, etc.
 - Inform Rowe's Construction of any circumstances where you do not have adequate information on a hazardous product to ensure your health and safety and others. Do not proceed if in question.

Do not handle any chemicals, gases, or powders you are not aware of or have not received proper training in. If you do not have the SDS, do not work with that chemical/powder/gas etc.! Report to your supervisor or safety department immediately.

ENVIRONMENTAL & WASTE PROTECTION

- The environment should be safeguarded during any type of work. All employees are expected to do their best to prevent harm to the environment at all times.
- The simplest form of environmental protection is to REDUCE, REUSE, AND RECYCLE. Plan ahead and apply these straightforward methods.
- Environmentally sensitive products should be stored, used, and disposed of in a manner that will provide appropriate protection to the environment. If unsure, ask a supervisor or safety rep and review SDS sheets.
- All spills of environmentally sensitive materials are to be reported to Rowe's Construction immediately. Spill Contingency Plan will be activated. Contain and clean up immediately if safe to do so. Appropriate regulators will be notified when applicable. Rowe's Construction will maintain an internal record of all spills.

Proactive measures:

- Follow the lead agency guidelines. i.e., LANDS, ENR, DOT, Oceans and Fisheries, National Energy Board (NEB), etc.
- Be aware of environmentally sensitive products on-site and what you're dealing with.
- Have SDS for all hazardous products and review with the crew as per legislation.
- Have available Spill Response gear and measures in place for site storage volumes.
- Any work near water - have a spill kit readily available, double-check for any leaks on equipment/tools, and do not proceed if apparent!
- Keep environmentally sensitive products at least 30m away from water sources and more based on the type of product(s), amount of and site-specific requirements
- Do not fuel tool/equipment within 100m of a water source.
- Establish a berm around, and an adequate liner under any fuel storage tanks, generator skids, light towers, fuel trucks on site for storage, all motors/pumps that run continuously unattended, equipment/vehicles that run continually are to have a drip pan placed underneath.
- Do not use supplies of 'Emergency Spill Kit' for day to day clean up, ensure spare supplies are available.
- Spill Contingency Plans are available at the offices, shops, posted, or in safety tote on remote sites.
- Examples of environmentally sensitive materials include but are not limited to: oils, fuels, batteries, antifreeze, acids, cement, solvents, cleaning agents, grease, gases, paints, glues, garbage, etc.

HEALTH / SAFETY / ENVIRONMENTAL INFORMATION RESOURCES

(Include but not limited to)

- As reviewed in WHMIS, **Safety Data Sheets (SDS)** provide critical information such as fire response, 1st aid measures, PPE, proper storage and handling, spill/leak, etc. Common controlled products found on worksites: gasoline, diesel, propane, antifreeze, paints, glues, solvents, cleaning liquids/powders, cement, and compressed cylinders such as oxygen and acetylene. You should know where the SDS is located on-site for controlled products you are working with. Take the time to read symbols and labels for your and other's safety awareness. Be sure and ask your supervisor or Safety rep if you're unsure.
- **OH&S - Act / Regulations / Codes.** (WSCC or Provincial OH&S). These are available at our office terminals, industrial shops, offices, and remote sites. Everyone should be aware of their location for reference to ensure compliance with current laws. Examples: welding, PPE, equipment maintenance, working at heights, housekeeping, ladders, scaffolds, excavation, traffic control, confined space, lockouts, hazard assessments, guard rails, etc., etc. OH&S can also be reviewed at www.wsc.ca.
- **SOP - Standard Operating Procedures** are step by step directions on how to conduct specific tasks and/or operate tools and equipment in a safe manner. SOP's are in applicable equipment, posted on sites, and found in site Hazard Control Binder. All employees are accountable for taking the time to review these prior to commencing work.
- **SWP - Safe Work Practice** the "Do's and Don't's" are generally written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes referring to tools, material, gear, tasks, equipment, etc. SWP's are found in site Hazard Control binders, applicable equipment and posted throughout our job sites and shops. All employees are accountable to take the time to review these prior to commencing work
- **National Codes:** Building, Fire, Plumbing, Electrical,
- **National Safety Code:** class 1 and 3 drivers, air endorsement, etc.
- **Manufacturer** manual(s), specifications, operator's manual

If you come across an SOP or SWP and feel additional information would contribute to our safety awareness and/or steps, please inform your supervisor, office management, or Safety rep without delay for review. If you feel an SOP or SWP should be developed to provide better health and safety and/or environmental information for a tool, equipment, or task, please make a note and submit to your supervisor or safety department for review. Your input is very important and appreciated.

Prior to conducting certain duties/tasks, you are required to review and sign off on all of the SOPs, SWPs, Code of Practices pertaining to those duties/tasks listed below, followed by a demonstration to your supervisor/foreman. These documents can be found in the Hazard Control Binder located in the shop, offices, or safety totes.

Standard Operating Procedure (SOP) include but are not limited to:

- #001 – Ladders. Extension and Step
- #002 – Quick Attach (loaders)
- #003 – Front End Loader (loading)
- #004 – Fueling (tanks, equipment, vehicles, boats)
- #005 – Ice Crossing Construction
- #006 – Vacuum Truck, unit #112
- #007 – Fueling with Jerry Cans
- #008 – Crusher Operations
- #009 – Excavation/Trenches Projects
- #010 – Confined Space Entry
- #011 – Hotsey Pressure washer
- #012 – Vacuum Truck, unit #148
- #013 – Vacuum Truck unit #183
- #014 – Fall Protection
- #015 – Traffic Control
- #016 – ‘Hot Work’. Welding, torches, portable heaters
- #017 - Tire Changing
- #018 - Tar kettle
- #019 - Snow Maker
- #020 - Emergency Response water/ice rescue
- #021 - GPR ice Profiling
- #022 - Lock out procedures
- #023 – Backhoe / Excavator Operations
- #024 - Electrical Safety
- #025 – Grader Operations
- #026 - Small watercraft vessel
- #027 – Typhoon water pump operations
- #028 – Winch Operations
- #029 – Packer Operations (Mobile)
- #030 – Water Truck Operations
- #031 – Dozer Operations/snow cat
- #032 – Loading of pellet with auger
- #033 – Loading / Unloading Equipment on trailer
- #034 – Forklift Operations
- #035 – Abrasive Cut off Saw
- #036 - Scissor lift / Aerial lift
- #037 - Brush cutter / line trimmer
- #038 – Asbestos Pipe Removal
- #039 – Snow Mobile
- #040 – Forward Lifts (Mobile)
- #041 – Compressed Gas Cylinder
- #042 – Walk Behind Asphalt Concrete Saw Cutters

- #043 – Vibrating Plate Compactor
- #044 – Portable Water Pumps
- #045 – Chipping our Cement Drums
- #046 – Cleaning & Disinfecting of Equipment & Vehicles
- #047 – Cleaning & Disinfecting of General Offices – Shop Areas
- #048 – Cross Border Truckers

Safe Work Practice (SWP) include but are not limited to:

- #001 - Use of Compressed Air
- #002 - Use of Cleaning Solvents and Flammables
- #003 - Rigging
- #004 - Proper Lifting Practices – Hoisting
- #005 - Use of Portable Grinders
- #006 - Grinding
- #007 - Fire & Use of Fire Extinguishers – PASS Procedure Poster
- #008 - Proper Manual Lifting Ergonomics
- #009 - Defective Tools
- #010 - Welding, Cutting, Burning
- #011 - Use of Portable Arc Welders (General)
- #012 - Varsol Solvent Tank (Parts)
- #013 - Use of Portable Ladders
- #014 - Use of Step Ladders
- #015 - Use of Propane (General)
- #016 - Use of Metal Scaffolds
- #017 - Use of Hand-Held Power Circular Saws
- #018 - Use of Explosive/Power Actuated Tools
- #019 - Cooks and camp assistants
- #020 - Chainsaw Operations (not falling trees though)
- #021 - Office staff
- #022 - Use of field knives-sharp blades/utility knives
- #023 - Hydraulic Ice Auger
- #024 – Hand Tools
- #025 – Electrical Power Tools
- #026 – Hauling of Aggregate, soil, gravel, snow, etc.
- #027 – Painting
- #028 – Use of ATV
- #029 – Cold Weather Safety
- #030 – White Out Conditions
- #031 – Hot Weather Safety
- #032 – Spotters/Signalers
- #033 – Heating of Tar Oil and Transfer
- #034 – Pressure Washing
- #035 – Hand Digging Underground Power / Utility lines
- #036 – Pilot / Escort Vehicle Operation
- #037 – Drill Press
- #038 – Respiratory Protection Face Mask

Code of Practices (NWT- WSCC/OH&S) but **Not limited to**, as WSCC regularly updates. Also, see at www.wscn.nt.ca

- Hazard Assessments
- Traffic Control Person (flagger)
- Confined Space
- Fall Arrest/Protection
- Lockouts
- Personal Protective Equipment (PPE).
- Thermal Conditions
- Working Alone
- Supervisory
- Camps and Accommodations

GENERAL SAFETY GUIDELINES / PROCEDURES & PRACTICES

Barricading: All open excavations, trenches, detours, open manholes, restricted areas, danger zones, temporary ground or floor openings, where there could be a hazard presented to any person through trips, slips or falls must be adequately and properly barricaded in accordance with OH&S regulations or supervisor and safety direction. Take no chances. Do not leave an open hole unattended or unprotected as people/children or animals are subject to the hazard.

Cameras, Audio-Video: Cameras are not permitted on Rowe's Construction sites unless authorized by senior management in writing. Exploiting visuals and/or audios of company and or client's business can lead to legal matters, removal from site, termination

Excavations/Trenching/Cutbacks, etc.:

- Review and follow our Standard Operating Procedure (SOP) #009 excavation/trench projects.
- All excavations and trenches shall be prepared in accordance with current Occupational Health and Safety regulations. Be sure to review and comply.
- All excavations must have appropriate entrance and exit routes in accordance with the nature of the excavation and soil types
- All open excavations or trenches must be properly guarded by a substantial railing or barricade and reflectors and/or flashing lights during the low light environment.
- Adequate ladders must be present to ensure safe egress for the excavation or trench. Have 2 ladders in the trench if more than 18' in length.
- Some trenches may be considered confined spaces. Be sure to check current legislation and company Confined Space SOP
- Location of below-ground facilities are positively identified by hand digging, water washing (low psi) and/or hydro-vac

Firearms:

- Possession of firearms by any person except police and oceans / fisheries officers are prohibited while on company or client's premises. Some special provisions are OK upon written approval from 2 senior management personnel, and the holder must have a valid PAL certificate and abide by their standards. Any offenses will be subject to the holder

Manual lifting/carrying, walking in general:

- Review SWP#008 Proper Manual Lifting Ergonomics
- Do not lift more than you can safely handle. Get help!
- When manually lifting an item, bend your knees, keep a straight back and use your legs to lift. Do not twist while lifting.
- Ensure your path of travel is clear of tripping hazards and not slippery. Observe, correct unsafe conditions
- Be aware of other activity
- Alter or rotate body mechanics to reduce strain on body parts. i.e., if pulling hose often or it's heavy, alter arms etc. to avoid overstraining and take required breaks
- Use mechanical equipment for heavy, awkward items where possible.
- Only authorized personnel are permitted to operate material hoisting equipment such as forklifts, pickers, zoom booms/telehandlers, aerial lifts, etc.
- Extra caution must be taken not to exceed the lifting limits of the lifting equipment and ensuring load security
- Refer to Lifting and Hoisting Safe Work Practice (SWP) prior to hoisting items
- The use of a crane, forklift or other equipment not intended as a personal lifting device is strictly prohibited

Batteries, Boosting:

- Severe injury can result from the misuse of batteries during handling, storage, and boosting. Always visually inspect a battery prior to handling with appropriate eye and hand protection. Leaking battery fluid will damage skin tissue upon contact. Only authorized personnel are permitted to boost batteries as improper set up can damage electrical or cause a fire or explosion, resulting in severe or permanent injury. Trained personnel must refer to the operator's manual of both vehicle/equipment to ensure proper steps are followed.
- Ensure booster cables are appropriate for voltage and in good condition. Defective or inappropriate cables can result in a fire
- Do not leave unattended.

Working near Power Lines:

Working near energized power lines poses a great danger and can result in death. Defined Danger Zones (unknown voltage) and Prohibited Areas (identified voltage) require specific precautions.

- No worker or equipment shall work within the Danger Zone (within in 3 meters of any overhead power line) without prior notification to the local power company and granted permission.
- No unqualified worker shall enter the Prohibited Zone.
- Work in the vicinity of power lines requires a designated qualified observer/signaler to ensure workers and equipment maintain a safe approach distance from power lines. The observer must be able to communicate to workers by radio or air horn clearly.
- Brushing work around power lines can only be done during daylight hours.
- Before starting work or any other activity in the vicinity of power lines, contact the local power company to establish safe approach distances, and required safety precautions.
- Do not place earth or other materials under or next to a power line if it reduces the clearance to the power line.
- Do not push snow or other materials at power line poles.
- Do not excavate or perform other similar work near overhead power lines if it reduces the support for the power line or pole.
- Rainy or moist conditions will present a higher risk, therefore, requires an increase of an additional 2 meters' distance or as per the power, company rep indicates or wait for better conditions.
- The greater the voltage, the greater the distance one needs to maintain from the line. Keep at least 3 metres away from the power line always. Higher the voltage and further distance that is required, you must get clearance from Power Company!!

Powerline Voltage	Minimum Distance
750 or more volts, but no more than 150,000 volts	3 metres
more than 150,000 volts, but no more than 250,000 volts	4.5 metres
more than 250,000 volts	6 metres

Lockouts:

- See company SOP#022 for lockout procedures and reference to current OH&S regulations. All energized/powering equipment to be cleaned, repaired, serviced, inspected, or physically altered must be - shut down / locked out (or isolated) / tested and tagged before commencing work. This includes stored energy such as hydraulic, air, stored systems, etc
- All persons conducting repairs/services/inspections shall have their own lock. e.g., 2 people working on and 2 locks required!!

Confined Spaces:

- A confined space is - An enclosed or partially enclosed area that meets all the following: **Crew MUST be trained & certified!!!**
 - Is not designed or intended for continuous worker occupancy (e.g., tanks, pipes, crawl spaces, culverts, etc.)
 - has restricted means of entry and exit that may compromise the provisions of first aid, evacuation, rescue, or other emergency response (e.g., manholes, electrical vaults, boreholes, pits, sumps, tanks, vertical or horizontal culverts, attics, crawl spaces,), and
 - is large enough so that a worker can bodily enter it (possible for the employee to fit his or her entire body within the space)
- Upon entering a confined space - **refer to the Code of Practice from the legislative branch** (WSCC, OH&S) and company SOP#010 for confined space. Must ensure safe air quality is monitored all the time (air monitor personnel is certified), the crew is trained in confined space & rescue, a spotter/monitor is present at all times, an emergency plan is developed and reviewed, and gear is readily available for the crew to respond to an emergency. Upon Entry/Exit, sign in with the attendant.

Flagging/Traffic Control:

- **Refer to - Code of Practice for Traffic Control Person.** OH&S / WSCC. All traffic control personnel are to be trained, upon commencing duty as per legislation and carry certification. Written Traffic Control Plan must be developed by the supervisor and reviewed/carried by Traffic Control Person.

Office Staff:

- The office staff is to be familiar with site postings such as the Emergency Response Plan (ERP), site inspections, location of SDS, emergency contacts & procedures, communication devices,

emergency alarm, muster station, and any other Health and Safety notices.

- Review and sign off on SWP#021 - office staff.
- Office workers shall ensure that the layout of their workstations is appropriate for their physical stature and that lighting is adequate.
- Desk and filing cabinets drawers shall be kept closed when not in use.
- Only one drawer of a filing cabinet shall be open at a time in order to avoid overbalancing.
- Floors shall be kept free of tripping hazards such as telephone cords, extension cords, and boxes.
- Sufficient electrical receptacles shall be provided for all electrical equipment being used.
- Sharp instruments such as scissors, letter openers, pencils, pens, and knives shall be kept at the front of desk drawers where they can be seen when the drawer is open. Open blade knives shall be stored in appropriate containers.
- Blades on paper cutters shall always be stored in the closed position.
- Desktop paper spikes shall never be used.
- When assigned to work in operating areas outside the office environment, office workers shall observe all safety rules applicable to the assigned area (e.g., personal protective equipment, designated smoking areas.)

Cell Phones / Communication devices

- The use of cellular phones while operating any equipment, / vehicles/tools, monitoring for safety (spotter, confined space, hot work) while working is prohibited.
- Communication devices (e.g., cellular phones, pagers, radios, etc.) that are not rated as being intrinsically safe shall be turned off before entering areas where combustibles vapors may be presented, area around open systems or in areas classified as hazardous or restricted. Do not use when within 10m of fueling
- Being distracted by personal cell phone use poses a serious hazard to yourself and others while working. Remove yourself clearly away from all work activities prior to using your phone. Use of phone on your break unless an emergency

Transportation of Dangerous Goods (TDG):

- Workers handling, using, or transporting dangerous goods must hold a valid TDG certificate or work under the care of someone who has.
- Ensure the TDG document is completed properly prior to transporting, receiving, or picking up.
- Ensure load security.
- Appropriate placards are established and clean.
- Refer to Tab. 14 of the company Health & Safety Program for further

reference.

- Have an SDS for the product(s) and review for your knowledge and prep.

Internet:

- Not to be used for personal use during working hours
- On campsites, the internet is provided to review your email and communicate with friends and family, etc. Not to be used for downloading huge personal files such as movies and songs as this slows down the system and limits business correspondence.

Fueling:

- Refer to SOP#004 & #007 for fueling (general) and fueling with jerry cans.
- Do not leave hose unattended during transfer.
- Keep ignition sources at least 3 meters (10feet) away.
- Place jerry cans on the ground prior to fueling.
- Ensure adequate ventilation when dealing with fuels.
- Ensure the spill kit is readily available.
- Use safety glasses and gloves when handling fuels.
- Exercise caution when near water sources, environmentally sensitive areas. Maintain a 100m distance from the shoreline when transferring fuels.
- Do not park or store fuel cans, vehicles, or equipment near water sources.
- Clean up all spills/leaks.
- Report any spill or leak to your supervisor and or safety department, asap no matter how small.
- Open fuel compartments slow as the vapors are explosive
- Any fuel storage more than 200L(drums, holding tanks, etc.) other than a pickup jock tank (double-walled) requires approval from General Manager. No plastic fuel filter as they can freeze/crack leading to the spill

Working Alone:

- Rowe's Construction has a working alone policy. Should you ever be required to work alone be sure to have a check-in time and available communication source arranged with your supervisor or their designate !! Should scheduled check-in time go by without positive communication, personnel will be dispatched to investigate. You are required to set up with your supervisor. Depending on the location and hazards associated, it could be every 2 hours for check-ins. Take no chances

Attitudes / Behaviors:

- All personnel on-site are subject to formal observations, which include any positive and negative findings. Findings are brought to the attention of either the project manager or site supervisor and client's management, if applicable. In turn, results are reviewed with the worker. Positives include being compliant and/or acceptable to Health/ Safety/Environment standards/best practices and Rowe's Construction expectations. Negatives include poor feedback, failure to correct unsafe conditions, not participating, not following, not conducting company or client's requirements. Positive attitudes and behavior are proven links to incident prevention. Poor attitudes and behavior will be terms for removal from site and working with Rowe's Construction

Fatigue Management:

- Fatigue is a serious condition that has led to many unfortunate incidents globally. We at Rowe's Construction expect everyone to be fit and healthy to carry out assigned duties during work.
- Take periodic breaks to minimize fatigue and increase mental fitness. Never operate motor vehicles and/or heavy equipment while excessively fatigued! Workers are provided ongoing training towards fatigue management through site postings, safety meetings and see below for further awareness and preventive measures
- Work schedules are managed to help control worker fatigue. Workers must report fatigue to their supervisors promptly. Supervisors will take appropriate actions to prevent loss.

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WSCC.nu.ca 1.877.404.4407



Respectful Workplace

- The prevention of violence, discrimination, and harassment in the workplace is a strong belief of Rowe's Construction while promoting equal opportunity and an environment in which all individuals are treated fairly and with respect. Every employee and contractor is entitled to employment that is free of harassment and violence. This applies to any source, including customers, co-workers, strangers, and domestic partners, or family members.
- Any act of harassment or workplace violence committed by or against an employee or a contractor is unacceptable and will not be tolerated. As Rowe's Construction is committed to taking every reasonable precaution to ensure that employees and contractors are not subjected to harassment or workplace violence, all substantiated incidents of such behavior will result in action by Rowe's Construction. An employee or contractor who subjects another individual to harassment or workplace violence will be subject to disciplinary action, up to and including termination.

Harassment

- Is one or a series of incidents involving unwelcome comments, conduct, gestures, or conduct that causes the recipient of those incidents substantial emotional distress. Harassment may, but need not be, based on one or more of the prohibited grounds of discrimination defined below. Harassment also includes sexual harassment, which is also defined below.
- Behavior that constitutes harassment includes, but is not limited to, verbal outbursts or abuse, sarcastic or derogatory comments, an action that undermines, demeans, belittles or humiliates an individual or group, yelling, screaming or other behavior aimed at intimidating, coercing, threatening, bullying or offending those at which it is directed.

Prohibited Grounds of Discrimination

- Include race, ancestry, place of origin, color, ethnic origin, citizenship, religion or creed, gender, sexual orientation, age, record of offenses, marital status, family status or disability and any other prohibited ground covered by the Canadian Human Rights Act or other territorial/provincial human rights legislation.

Sexual Harassment

- Is one, or a series of incidents involving unwelcome comments, conduct, gestures or contact of a sexual nature that is likely to cause offense or humiliation to an employee, or that might, on reasonable grounds be perceived by that employee as placing a condition of a sexual nature on employment or on an opportunity for training or promotion.
- Behavior that may constitute visual, physical or psychological sexual harassment includes, but not limited to sexist jokes, leering, display of offensive material of a sexual nature, sexually degrading comments, sexually suggestive or obscene comments or gestures, unwelcome sexual flirtation or advances, unwanted contact after the end of a consensual relationship, requests for sexual favors, unwanted touching, verbal abuse or threats, and sexual assault.

Workplace Violence

- Is the exercise of physical force, an attempt to exercise physical force or a threat to exercise physical force against an employee or another individual in a workplace that causes, or could cause, physical injury to the employee or the other individual.
- Examples of workplace violence include, but not limited to, threatening behavior such as shaking fists, destroying property or throwing objects; verbal or written threats that express an intent to inflict harm; physical attacks; and any other act that would arouse fear in a reasonable person in the circumstances.
- Any matters of harassment, violence, or discrimination are investigated fully. A complaint is made in writing and presented to your supervisor without delay. Management will be consulted. Do all you can to remove yourself from the occurrence, document any factors safely.

COR – Certificate of Recognition:

- Rowe's Construction has been COR certified since 2009 when this standard became achievable in the NT. COR is a recognized industry standard based on a company's health and safety management systems. Audits consist of 15 sections and must obtain 50% minimal in all sections with an overall score of 80% to achieve and maintain certification. Yearly internal audits are conducted to evaluate, support ongoing improvements, and proactive measures. Every 3 years, an External Audit is conducted by a 3rd party to verify systems are in place, being recorded and followed. All audits consist of Interviews, observations, and documentation review.

Proud to announce our 2019 Internal COR audit was completed, and we achieved a strong passing grade of 95%. It takes a great deal of commitment, professionalism & dedication by all levels of the company to maintain such a high score. **Congratulations to everyone** for their contributions and participation in keeping our workplaces safe. Strong communication through tailgate & safety meetings, the use of proper PPE, and an ongoing commitment to training are a few of the key highlights in this year's audit.

Areas that we will be striving to improve over the next year include:

1. Create JHA and SOP for changing grader/dozer blades and cutting edges.
2. Increased review of SWP/SOP's with crews at tailgates.
3. More frequent inspections of fire extinguishers on heavy equipment & vehicles and formal inspections of work sites.
4. They are conducting mock emergency response drills to ensure that staff is prepared in the event of an emergency situation.
5. Improve supervisor training with regard to Return to Work processes & procedures

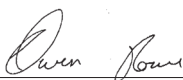
TRADES/OPERATORS/APPRENTICES/ GENERAL HELPERS/ LABOURERS - REQUIREMENTS

- This handbook – Quiz and signed off in back to be completed and returned to your supervisor or safety dept. promptly.
- Copy of Driver's License if using Rowe's Vehicles/Equipment.
- Abstract if operating or driving on public roads / HWYs.
- Application or Resume – Indicating years of Experience/work history/training – "Highlight your skills."
- Copy of Trades – Certificates/degrees (e.g., Mechanic, carpenter, welder, etc.).
- Photocopy of valid safety certificates and training – 1st aid, H2S, TDG, WHMIS, flag person, chainsaw, etc.

Notes:

- Personal Protective Equipment – Steel toe boots & reflective vests are a **MUST** before work even begins. Hard hats, safety glasses, safety harness (fall arrest) are mandatory as job/task requires. Check with supervisor and Occupational Health & Safety (OH&S) requirements.
- Know who your supervisor is, whom to report hazards, incidents/near misses too, who gives you direction.
- Pre-trip inspections are to be completed every day for each piece of equipment/vehicle and returned to the supervisor daily or asap.
 - Submit any driving infractions to the office. These are to be held in the employee file. Contractors are to advise their supervisor

Any questions or concerns regarding these requirements call John Dempsey @ 867-695-3243 in Ft. Simpson.



Owen Rowe - COO

Standard Hand Signals (Vehicles/Equipment/trailers. Etc.)

PROCEED SLOWLY FORWARD



Always face palms in direction of desired travel

PROCEED SLOWLY BACKWARD



Then bend both arms repeatedly forward head and chest, and then extend

CLEAR TO LEAVE THE AREA



Point at the driver and gain eye contact



Turn and extend arms in desired direction

TURNS



Point one arm to indicate the direction to turn, bend monitoring arm repeatedly forward head to indicate continued turning.

EMERGENCY STOP



Start with hands clasped over head. Extend downward repeatedly until vehicle stops.

DISTANCE TO STOPPING POINT



Face palms forward with hands above head. Bring elbows forward and hands together.

STOP



Cross both arms above head.

Forklift / Telehandler (zoom boom) Hand Signals



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Quiz

Grade: _____ / 50

Ensure 50/50 upon completion

Name: _____ Date: _____

Position: _____

Who hired you? _____

Contractor (if applicable) _____

Contractor Ph: _____

Handbook Revision: January 2021

Please complete the quiz and return it to your supervisor or safety department prior to starting work. Do not hesitate to ask for further information if you have any questions or concerns.

1. Where are the first aid kits and fire extinguishers located?
 - a) offices
 - b) main shops
 - c) vehicles/heavy equipment
 - d) camps/kitchens
 - e) all of the above

2. Whom would you call in case of an emergency?
 - a) site supervisor /foremen asap.
 - b) your best friend.
 - c) your immediate family.
 - d) management, and appropriate authorities (RCMP, fire dept, etc.).
 - e) a and d
 - f) b and c

3. What document do you complete on a task by task basis?
 - a) Superintendent Report
 - b) Site Inspection Form
 - c) Field Level Hazard Assessment (FLHA)
 - d) Site Project Hazard Form

4. What must be done before operating any Rowe's Construction or contractor vehicle/equipment?
 - a) walk around
 - b) kick tires
 - c) pre-trip inspection checklist and review prior ones
 - d) get someone else to check out the vehicle

5. What are your legislative rights as an employee when it comes to hazards in the workplace?
 - a) The right to know about hazards in the workplace
 - b) The right to participate in making your workplace safe
 - c) The right to refuse unsafe work
 - d) All of the above
6. Does Rowe's Construction have a Working Alone Policy? Yes or No
7. Are shorts an acceptable form of work clothing? Yes or No
8. Near miss, incidents do not need to be reported? True or False
9. WHMIS is composed of three key elements: Labels, SDS (Safety Data Sheets) and Worker Education? True or False
10. When working alone what is the minimum time frame between checking with your supervisor or designated contact?
 - a) 1 Hour
 - b) 2 hours
 - c) 6 hours
 - d) At the end of the day
11. During heavy equipment operations, can an additional person ride in the cab if, there is only one seatbelt Yes or No
12. List two sources of information you should review and have nearby when dealing with environmentally sensitive and/or hazardous products (WHMIS) or dangerous goods?
 - a) ask the driver and check ticket
 - b) label(s) and SDS (Safety Data Sheet)
 - c) permit and packing slip
 - d) the shipping label and tracking ticket
13. After an incident in which you were involved in or witnessed, what is required from you?
 - a) a written statement within 24hrs
 - b) verbal notice to your supervisor or management immediately
 - c) wait to be asked
 - d) both A and B

14. Where could you find a copy of the Occupational Health and Safety Act / Regulations / Codes?
 - a) Locker
 - b) shops/offices/remote sites, safety tote, supervisor, safety department & online
 - c) generator shack
 - d) pickups and equipment

15. What does SWP stand for?
 - a) Safety With Practice
 - b) Supervise Work Procedures
 - c) Safe Job Procedure
 - d) Safe Work Practice

16. What does SOP stand for?
 - a) Standard Operating Procedure
 - b) Safe Operating Practice
 - c) System Operating Problems
 - d) none of the above

17. All employees/contractors are required to do a hazard assessment prior to any task and communicate any concerns to supervisor/foreman and crew members, so control measures are established and known by all prior to starting? True or False

18. Is it my legal responsibility to watch out for co-workers, public, and environmental health and safety at all times? Yes or No

19. If I am unsure of my task/duty what should you do? 'x' your answer
 - o Be careful and take my time
 - o Wait until I am properly instructed, trained, and feel comfortable with the task/duties.

20. What Heavy Equipment rule states equipment lights have to be on? # _____

21. Is there an SOP for Excavation/trench projects? Yes or No

22. During a pre-trip inspection am I required to check insurance and registration for the vehicle or equipment? Yes or No

23. If my supervisor/foreman asked me to move a piece of equipment or operate a tool in which I have not received formal training, is it OK as long as I move slow and take my time? Yes or No

24. Should a deficiency be found while conducting a pre-trip inspection(s), who should you notify?
 - a) Supervisor
 - b) President and CEO
 - c) HSE
 - d) Leave it for the next operator

25. What page could I find my Safe-Performance Self-Assessment?
a) 7 b) 56 c) 35 d) 20
26. General company rule # _____ relates to “upon arrival to active work sites: Know who the supervisor is and review ERP, etc
27. What are 3 main steps in conducting / documenting a hazard assessment?
a) List the task & steps, identify the potential hazards for each step and list control measures for the identified hazards.
b) Discuss the duties of the job, appoint necessary workers, proceed with the job.
c) Talk to the supervisor about the task, talk to the mechanic about the task, have workers conduct the task
d) Identify the steps to conduct the job safely, document hazards with the job, proceed with the job.
28. What should be referred to, reviewed and inspected when conducting hazard assessments?
a) weather, emergency response plan, ground conditions
b) utilities, pinch points, projectiles, fire, gases, fumes,
c) OH&S act/regulations/codes, (legislative), see index
d) Crew's training records, proper tools & equipment used
e) client's requirements, permits, hazard areas,
f) environmental impact, sensitive areas, disposals
g) SDS, chemicals,
h) Company - Hazard Control binder: SOP's, SWP's, Code of Practice's
i) all the above
29. What SWP # is referred to for office staff operations/awareness?

30. What General Company rule refers to pets on site or in company vehicles? # _____
31. Who should be involved with conducting and review of Job Hazard Assessment (JHA) or Field Level Hazard Assessment (FLHA)?
a) new workers and safety department
b) supervisor or foreman
c) supervisor/worker and all personnel involved with task/job
d) only management and supervisors

32. When are services required on vehicles?
- a) 250 hrs. or 5000km
 - b) 1000hrs or 8000km
 - c) when maintenance notifies you
 - d) When the oil is dirty
33. When is heavy Equipment required for service?
- a) every 500hrs
 - b) every 1000hrs
 - c) when the oil is dirty
 - d) every 250hrs
34. When are hazard assessments and Emergency Response Plans (E.R.P) required?
- a) on remote sites, only
 - b) when requested by an inspector
 - c) not required
 - d) all active job sites
35. What is considered the danger zone when working in the vicinity of power lines?
- a) Within 2 meters
 - b) Within 1 meter
 - c) Within 5 meters
 - d) Within 3 meters
36. In the event of a spill or leak, who would you contact first?
- a) Supervisor
 - b) Fire Department
 - c) WSCC
 - d) Cover it up and don't tell anyone
37. Does the company have a disciplinary action policy and use violation forms for non-conformance? Yes or No
38. Circle two places you could find emergency contact numbers?
- a) Telephone book
 - b) Employee handbook
 - c) Emergency Response Plan
 - d) Internet
39. What is the safest way to locate & uncover below ground utilities?
- a) x-ray
 - b) machine excavation
 - c) hydro testing
 - d) hand digging/water washing (low psi) and/or hydro-vac
40. What does SDS stand for?
- a) Sensitive Data Sheets
 - b) Safety Data Sheet
 - c) Special Distance Specs
 - d) Safety Device Standard

41. How long is your WHMIS certificate valid?
a) 3 years b) 1 year c) Doesn't expire d) 2 years
42. Harassment, Violence, Discrimination offenses are grounds for disciplinary action, including termination? True or False
43. Company rule # _____ references failure to comply.
44. Can you identify the Heavy Equipment rule that refers to ensuring your load is secure? # _____
45. What SOP # is for Lockouts? # _____
46. What SWP # is for use of utility/sharp blades /knives? # _____
47. List in correct order the safest hazard control measures?
a) Substitution, separation, administration, elimination, PPE
b) PPE, substitute, administration, separation, eliminate
c) Eliminate, substitute, redesign, separation, administration, PPE
48. While operating a motor vehicle within any facility, you must obey all traffic laws and rules? True or False
49. In the event of an emergency, how would you make contact?
a) Radio
a) Satellite Phone/text (in reach)
b) Text co-worker
c) Land Line
d) All of the above
50. List 3 safe practices you should use when fueling a vehicle or piece of heavy equipment:
a) _____
b) _____
c) _____

Name: _____ Date: _____

Email Address: _____

Your Contact Ph#: _____

Do you hold any of the following safety qualifications? Please circle the one's you currently hold and provide a photocopy

TDG – WHMIS - FIRST AID - H2S- CHAINSAW - FLAG PERSON

Other: _____

Please provide a copy

1. **Have you had any claim filed with WSCC / WCB in the last five years?** YES NO **Not applicable to contractors**
If so, what is the nature of the injury/illness?

2. **Do you have any recurring medical problems?** YES NO
If so, please specify: **Not applicable to contractors**

3. **Are you seriously allergic to any medications or any other conditions you may encounter in the workplace (e.g. Bee stings, food allergies, etc)?** YES NO
If yes, please indicate:

4. **Any medication(s) and/or medical conditions? (Information we should share only with medical professional(s) in the event you were not responding. This is confidential)**

5. **Next of kin or emergency contact?**

Name: _____ Ph: _____

Confirmation and Acknowledgment:

I have received, read, and understand Rowe's Construction employee & contractor handbook. I acknowledge that in accepting and/or continuing employment with 851791 NWT Ltd o/a Rowe's Construction, I am expected to abide by the content in this employee & contractor handbook, the company Health and Safety Program, rules, policies, guidelines, site posting, our client requirements, legislation, and submit employee and/or contractor requirements. Failure to do so and perform my work in an unsafe manner will be cause for my disciplinary action, including termination.

Signature: _____

851791 NWT LTD O/A
ROWE'S CONSTRUCTION

**25 Studney Dr.
Hay River, NT.
X0E 0R6
PH. 867-864-3243
FAX.867-695-6558**

**P.O. BOX 347
Ft. Simpson, NT
X0E 0N0
PH. 867-695-3243
FAX.867-695-2818**

Contractors only complete if operating a Rowe's Construction unit

I, _____, AUTHORIZE
ROWE'S CONSTRUCTION, AS NOTED ABOVE, TO OBTAIN A
COPY OF MY DRIVER'S ABSTRACT FROM THE PROVINCE
OR TERRITORY THAT ISSUED MY LICENCE; AND MAY
OBTAIN A COPY OF MY DRIVER'S MEDICAL FROM MOTOR
VEHICLES.

Rowe's Construction company insurance broker receives a copy.

Provide a photocopy of the license to Rowe's Construction

Driver License: # _____

Class: _____ Territory\Province: _____

Expiry Date: _____


Next Medical date if Class 1 or 3. This is required. Phone
your branch terminal to find out if you're not sure _____

Contractor if applicable: _____

**The signing of this document does not deny the authority of Rowe's
Construction to request a full employment medical whenever
necessary.**

SIGNATURE

DATE



WHMIS Pictograms

Workplace Hazardous Materials Information System

2015

Flame

- Flammable
- Self-Reacting
- Pyrophoric
- Self-Heating
- In Contact with Water, Emits Flammable Gases
- Organic Peroxide

Flame over Circle

Oxidizer

Exploding Bomb

Explosive*

Self-Reacting (severe)

Organic Peroxide (severe)

Gas Cylinder

Gas Under Pressure

Corrosion

Serious Eye Damage

Skin Corrosion

Corrosive to Metals

Exclamation Mark

Irritation (skin or eyes)

Skin Sensitization

Acute Toxicity (harmful)

Specific Target Organ Toxicity (drowsiness or dizziness, or respiratory irritation)

Hazardous to the Ozone Layer*

Skull and Crossbones

Acute Toxicity (fatal or toxic)

Biohazardous

Biohazardous Infectious Materials

Health Hazard

Carcinogenicity

Respiratory Sensitization

Reproductive Toxicity

Target Organ Toxicity

Germ Cell Mutagenicity

Aspiration Hazard

Environment

Aquatic Toxicity*


A GHS pictogram appropriate for the hazard

Physical Hazards Not Otherwise Classified


Health Hazards Not Otherwise Classified


NOTE: No pictogram is assigned to some hazard classes e.g., Combustible Dusts and Simple Asphyxiants, and some less severe hazard categories.

*Not required by WHMIS, but may be used.









At Rowe's Construction We Do **Not** handle the following without adequate training and gear:

Bio-Hazardous Infectious Material

Exploding Bomb Symbol – explosives, self-reacting, organic peroxides as they have very severe consequences.

Dynamite/Explosives as per TDG.

Should you encounter, these materials contact your supervisor or the HSE department immediately.

AUTHORIZATION TO



UNSAFE WORK

**I, Jack Rowe, of Rowe's Construction Ltd.,
authorize the holder of this handbook to
stop any activity where they deem the
person or personnel to be at risk.**