



Health and Safety Manual

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Table of Contents

Section 1 – INTRODUCTION	5
HEALTH & SAFETY COMMITMENT	5
PURPOSE	5
STATEMENT OF RESPONSIBILITIES	7
OWNERS & MANAGEMENT WILL:	7
SUPERVISORS WILL:	7
WORKERS WILL:	8
SUBCONTRACTORS WILL:	8
VISITORS WILL	8
REVIEWING AND REVISING THE PROGRAM	9
GENERAL SAFETY RULES	10
Section 2 – DEFINITIONS	11
“Administrative Controls”	11
“Controlled products”	11
“Emergencies”	11
“Engineering Controls”	11
“First Aid”	11
“Hazard”	11
“Hazardous Products”	11
“Medical Aid”	11
“MSDS”	12
“Personal Protective Equipment (PPE)”	12
“Risk”	12
“Safe Job Procedure”	12
“Safe Work Practices”	12
“SDS”	12
“Serious Injury or Incident”	12
“Supplier”	12
“WHMIS”	12
“Workplace Injury”	12
Section 3 – SAFETY POLICIES	13
THE RIGHT TO REFUSE UNSAFE WORK	14

PURPOSE	14
PROCEDURES	14
JOINT HEALTH AND SAFETY COMMITTEE.....	17
PURPOSE	17
ORIENTATION AND TRAINING	19
PURPOSE	19
ROLES AND RESPONSIBILITIES	19
Specialty Training	20
RECORDS	21
HAZARD ASSESSMENT AND CONTROL.....	22
PURPOSE	22
STANDARDS	22
WORKSITE INSPECTIONS	25
PURPOSE	25
RESPONSIBILITIES.....	25
PREVENTATIVE MAINTENANCE PROGRAM	25
PURPOSE	26
STANDARDS	26
PERSONAL PROTECTIVE EQUIPMENT (PPE)	27
PURPOSE	27
STANDARDS	27
RESPONSIBILITIES.....	27
EMERGENCY PREPAREDNESS PLAN	29
WORKPLACE INJURIES AND FIRST AID.....	35
POLICY	35
PROCEDURES	35
WORKPLACE INCIDENT INVESTIGATION.....	37
PURPOSE	37
STANDARDS	37
WORKING ALONE.....	39
PURPOSE	39
PROCEDURES	39
PURPOSE	40
STANDARDS	40
WORKPLACE HAZARDOUS MATERIAL INFORMATION SYSTEM (WHMIS).....	43

PURPOSE	43
PROCEDURES, PRACTICES, STANDARDS	43
GUIDELINES	44
COMMERCIAL VEHICLE PROGRAM	47
OVERVIEW	47
WASTE MANAGEMENT AND ENVIRONMENTAL PROGRAM	49
POLICY	49
FITNESS FOR DUTY PROGRAM	50
PURPOSE	50
DEFINITIONS	51
SECTION II. TESTING APPLICATIONS	56
SECTION III. REFUSALS AND PROHIBITIONS	58
SECTION IV. TESTING METHODOLOGY	60
SECTION V. ACTION ON TEST RESULTS	62
SECTION VI. RESPONSIBILITIES	64
SECTION VII. ACCOMMODATION	66
AGREEMENT AND ACKNOWLEDGEMENT	67
APPENDICES	68



Section 1 – INTRODUCTION

HEALTH & SAFETY COMMITMENT

PURPOSE

Providing a safe, healthy, respectful workplace for all employees, clients, visitors, contractors and business partners across the various communities and sites where Lenbeth operates is of paramount importance to Lenbeth. The extent of Lenbeth operations requires everyone to affirm their ongoing, everyday commitment to the Lenbeth safety culture. Through compliance with legislation, regulations, and strong behavioral practices everyone shares in the responsibility for their personal safety and well-being, including the safety of those they work with, regardless of authority level.

Preventative measures are the strength of our safety culture. Through strong, clear communications, practical procedures, guidelines, and training, Lenbeth prepares everyone to work in a safe, healthy, and productive way to prevent occupational injuries or disease. Through our collective efforts we reflect the quality, craftsmanship and pride in our work.

By ensuring the availability and proper use of the right equipment for each of us, Lenbeth contributes to preventing occupational injuries by minimizing the short cuts that can jeopardize our health and quality of life.

Ownership and Executive Leadership require everyone we work with or who is part of our community to do their utmost to meet or exceed our safety commitment. This dedicated effort is at the forefront of our safety policy, practices and operating principles that guide our safety culture:

Safety Performance is Vital to Operational Excellence.

- Safety performance has a positive impact on our employees, guests, visitors, contractors, business partners, and the communities where we operate.

Occupational Injuries and Illnesses are Preventable.

- Yes, our focus is to prevent injury or illness, however, each occurrence provides insights and learnings to strengthen our resolve to reduce the possibility of a recurrence. Through these learnings we can continuously improve our safety programs and initiatives to benefit everyone.

Safety Leadership is Everyone's Responsibility.

- By identifying potential hazards, inefficiencies, improvements and better, safer ways to complete our work, we look after ourselves and our co-workers. Our safety culture is inclusive and responsive to everyone's observations and ideas. Together we can achieve a safer and healthier workplace for everyone.



Safe Behavior.

- May be the most important tool in your toolkit. The work must be done safely or not at all.

A commitment to sound safety practices doesn't start and stop with the workday, it is a way we live every day and your personal commitment to safety goes beyond the workplace. By embracing a safe, healthy lifestyle you are fit to work and support yourself and those who count on you every day.

AT LENBETH – SAFETY COMES FIRST

STATEMENT OF RESPONSIBILITIES

The Occupational Health and Safety Act (Alberta) outlines the responsibilities for all levels of employees at Lenbeth. The responsibilities are as follows:

OWNERS & MANAGEMENT WILL:

- Ensure workers are aware of their occupational health and safety rights and duties.
- Ensure workers are not subject to, and don't participate in, workplace harassment or violence.
- Provide a safe workplace.
- Maintain a safety program.
- Ensure that workers are properly trained for the work they are required to do.
- Provide or require the use of Personal Protective Equipment (PPE) as required.
- Ensure regular inspections are done, inspection reports completed and retained.
- Ensure proper maintenance of equipment.
- Correct unsafe conditions.
- Provide first aid.
- Investigate all incidents.
- Report injuries to the Worker's Compensation Board as required.
- Set a good example.

SUPERVISORS WILL:

- Take all precautions necessary to protect the health and safety of every worker under their supervision.
- Advise workers about all known or reasonably foreseeable hazards to health and safety in their work area.
- Report health and safety concerns to management.
- Promote safety awareness.
- Establish safe work procedures.
- Instruct workers about safety.
- Correct unsafe practices.
- Correct unsafe conditions.
- Enforce safety rules.
- Investigate work sites for hazards.
- Report all incidents and investigate when required.
- Ensure proper maintenance of equipment.



- Comply with all safety legislation.
- Set a good example.

WORKERS WILL:

- Protect their own health and safety, as well as that of other people at or near the work site.
- Use all devices and wear all Personal Protective Equipment (PPE) required.
- Refrain from causing or participating in workplace harassment or violence.
- Participate in any training provided by the employer.
- Follow safe work procedures.
- Report unsafe conditions.
- Correct unsafe conditions.
- Report unsafe acts.
- Report any injury or incident.
- Comply with rules and legislation.
- Make safety suggestions.
- Set a good example.

IN ADDITION, MANAGEMENT, SUPERVISORS, AND WORKERS WILL:

- Cooperate with any person exercising a duty authorized to achieve compliance with the Occupational Health and Safety Act, Regulation and Code (Alberta).
- Comply with the Occupational Health and Safety Act, Regulation and Code (Alberta) and all work site policies, procedures, and codes of practice.
- Ensure workplace injuries and illnesses are reported to Workers Compensation in a timely manner.

SUBCONTRACTORS WILL:

- Follow safe work procedures.
- Report loss time accidents to Lenbeth.
- Use competent employees.
- Train employees in safe work practices.

VISITORS WILL

- Be accompanied by a member of Lenbeth Group of Companies at all times and will follow all the instructions, knowing that they are in the best interests of the visitor's health and safety.
- wear personal protective equipment as required by the job site and job conditions.

Appendix: Visitor orientation and sign off.



- Visitors that will be attending the office and or shop for an extended period will be provided with an orientation for review and sign off understanding.
- Sign in for the duration of their visit and out once complete.

REVIEWING AND REVISING THE PROGRAM

As per Part 5, section 37(4) of the Occupational Health and Safety Act of Alberta, this health and safety program will be reviewed every three years. In the event that there is a change in circumstances at the work site that creates or could create a hazard to workers the program will be reviewed and revised as appropriate.

The Safety Representative is responsible for monitoring changes to the Occupational Health and Safety Act of Alberta and updating this manual as may be required.

The Safety Representative shall initiate the health and safety program review on a cyclical basis not less than once every three (3) years.

The Joint Health and Safety Committee shall undertake a cyclical review of all procedures in conjunction with the schedule set out by the Safety Representative. Lenbeth management will consider and support the implementation of changes as may be required.

GENERAL SAFETY RULES

- Consuming or being in possession of alcohol or illegal drugs on company premises, or on any job site, is prohibited.
- Fighting, horseplay, practical jokes or otherwise interfering with other Workers is prohibited.
- Harassment of or committed by Lenbeth employees will not be tolerated (Respectful Workplace Policy)
- Running is not permitted anywhere regardless of location, except in cases of an extreme emergency.
- Theft, vandalism or any other abuse or misuse of company property is prohibited.
- Incidents, injuries or “near misses”, regardless of their nature, shall be promptly reported to an immediate Supervisors (Superintendent, Construction Manager Field Manager, etc.).
- First aid treatment is to be obtained promptly for an injury.
- Approved hard hats, safety boots and safety glasses and appropriate Personal Protective Equipment (PPE) shall be worn where required on the job by anyone who accesses a worksite requiring PPE.
- Smoking is permitted only in designated areas and never in constructed buildings.
- Hand tools shall not be used for any purpose other than what is intended. All damaged or worn parts shall be promptly repaired or replaced.
- Only those individuals trained and authorized shall operate power tools, with guards furnished by the manufacturer in place and in a manner intended by the manufacturer.
- Every Worker shall keep their work area neat and orderly.
- All work shall be carried out in accordance with appropriate safe work practices and a Supervisor's direction.
- Sickness, Absenteeism must be reported to Supervisors immediately before commencement of shift to accommodate the scheduling of tasks for the day. Failure to report will be followed by a verbal warning, second time a written warning and a third written warning and dismissal may occur at the discretion of management. Unless the employee is in probationary period. No call/no shows may result in immediate termination.
- Theft, vandalism, or any other abuse or misuse of company property is prohibited
- Every worker shall comply with current Occupational Health and Safety regulations. See worker responsibilities and OH&S code.

Section 2 – DEFINITIONS

“Administrative Controls” are a form of hazard control that entails changes to work process, policies, training, or rules designed to reduce workers’ exposure to hazards.

“Controlled products” are products, materials or substances that meet the criteria for one or more of the six (6) WHMIS product classes.

“Emergencies” are typically sudden, powerful events outside of the range of ordinary daily experiences.

“Engineering Controls” are a form of hazard control that entails modifications to the workplace, equipment, materials, or work processes to reduce workers’ exposure to hazards.

“First Aid” is a one-time treatment or care administered only by a trained First Aider. First Aid includes, but is not limited to:

- Cleaning minor cuts, scrapes, or scratches.
- Treating a minor burn.
- Applying bandages and/or dressings.
- Applying a cold compress, cold pack, or ice bag.
- Applying a splint, or
- Changing a bandage or a dressing after a follow-up observation visit.

“Hazard” an occupational hazard is a physical item or situation with the potential to harm a Worker. Occupational hazards can be divided into two categories:

- Safety hazards that cause incidents that physically injure Workers.
- Health hazards which result in the development of disease.

The term "hazard" refers to the potential to cause harm. In the case of a workplace health hazard, the harm is to a Worker's health and usually takes the form of an injury or illness.

It is important to note that a "hazard" only represents the potential to cause harm. Whether it does cause harm depends on circumstances, such as the toxicity of the health hazard, would require an assessment of exposure amount, and duration.

Hazards can also be rated according to the severity of the harm they cause - a significant hazard being one with the potential to cause a serious injury or death.

“Hazardous Products” means those products regulated by WHMIS or other legislation.

“Medical Aid” includes medical and other services provided by a person licensed to practice general medicine, or emergency medical services such as a Paramedic, Nurse or Emergency Technician in Alberta.

“MSDS” means the Material Safety Data Sheet. A document required under WHMIS regulation containing specific data about hazardous material properties and safe handling procedures.

“Personal Protective Equipment (PPE)” A form of hazard control designed to protect the Worker by identifying specific protective equipment or clothing of a specific standard, to be worn by a Worker should they come into contact with a hazard.

“Risk” The hazard posed by some material(s) or a situation is its potential to cause harm. Risk is the probability, or chance, a hazard will actually harm someone. Removing occupational hazards is only one way of improving Worker protection. A more practical approach to limit occupational hazards is the control or management of the risks hazards pose.

Sometimes, risk includes a consideration of the seriousness of the hazard, in addition to the probability of a hazard causing harm,

The consequences of exposure to some hazards may be so harmful that, even if there is little chance of a Worker being exposed, the risk is so great extreme precautions must be taken to prevent even smallest possibility.

“Safe Job Procedure” is a written, step-by-step description of how to do a job from start to finish. Written job procedures are used to train new Workers and Workers moved to new jobs. Workers also use Safe Job Procedures as a reference, especially for complex jobs, particularly hazardous jobs, or for jobs that are not done often.

“Safe Work Practices” are a set of positive guidelines (do’s and don’ts) on how to perform a specific task that may not always be done in a certain way. Safe Work Practices are ways of controlling hazards and doing jobs with a minimum risk to people and property.

“SDS” means the Safety Data Sheet. A document required under WHMIS regulation containing specific data about hazardous material properties and safe handling procedures.

“Serious Injury or Incident” In accordance with the Alberta Occupational Health & Safety Act, a serious injury or incident must be reported to the Director of Inspection within twenty-four (24) hours.

“Supplier” A person or company that manufactures, processes, or packages a controlled product or that sells or imports a controlled product.

“WHMIS” means the Workplace Hazardous Materials Information System. A Canada wide information system dealing specifically with safe management and use of hazardous materials legislated by both Federal and Provincial governments.

“Workplace Injury” Any injury occurring on Lenbeth’ premises, workplaces, work sites or during the transaction of approved Lenbeth business.

Section 3 – SAFETY POLICIES

PROGRESSIVE DISCIPLINE

PURPOSE

Lenbeth Weeping Tile (EDM) is committed to maintaining a fair and respectful workplace. In situations where employee performance or behavior does not meet company expectations or violates company policies, the company will apply a progressive discipline process. The goal of this process is to provide employees with opportunities for correction and improvement while ensuring that all employees are treated equitably and fairly.

This Progressive Discipline Policy outlines the steps and procedures that will be followed when addressing performance or conduct issues. Each step provides clear expectations, guidance on correcting behavior, and the potential consequences for further violations.

PURPOSE

The purpose of this policy is to provide a structured approach to address performance and behavioral issues. Encourage employees to meet or exceed the company's expectations for conduct and job performance. Ensure that all employees understand the consequences of non-compliance with company policies and expectations.

SCOPE

This policy applies to all employees of Lenbeth Weeping Tile (EDM). The progressive discipline process is intended to be used for addressing performance or behavior-related issues, including violations of company policies, unsatisfactory job performance, and unprofessional conduct.

Steps

- Coaching and training
- Verbal Warning
- Written Warning
- Final Warning
- Termination

Final warning and termination may occur concurrently.

Leaders to reference the HR Progressive Discipline Policy for Procedures and directions.

THE RIGHT TO REFUSE UNSAFE WORK

PURPOSE

All workers have the legal right to refuse unsafe work that:

- puts them in imminent danger, or;
- requires them to perform work they have not been properly trained to do, or;
- present safety hazards that could reasonably be avoided with proper safety equipment, procedures, or necessary repairs.

According to, Section 17 of Alberta's Occupational Health and Safety Act, a worker may refuse to work or do particular work where there exists imminent danger, no Worker shall:

- Carry out any work if, on reasonable and probable grounds, the Worker believes there exists an imminent danger to the health or safety of that Worker.
- Carry out work if, on reasonable and probable grounds, the Worker believes doing so will cause to exist an imminent danger to the health and safety of that Worker or another Worker or another person present at the work site; or
- Operate any tool or equipment if, on reasonable and probable grounds, the Worker believes it will cause an imminent danger to the health or safety of that Worker, another Worker or a person present at the work site.

PROCEDURES

In the event a worker refuses work, or work is stopped, the following actions are required:

Employee

- The worker must immediately inform their supervisor, or their appropriate designate, of their refusal to enter or complete with an explanation of the circumstances they believe may place them in danger.
- The worker refusing work must remain in a safe place near the workplace deemed unsafe. The worker must cooperate with the individual or supervisor identified to complete the investigation of the unsafe work conditions.
- The worker must make themselves available to the supervisor or the individual authorized to complete an investigation.
- If the investigation identifies solutions and takes action to remedy the concerns of the worker, the worker (or others affected by the refusal and subsequent investigation) is expected to return to work.
- In the event that a worker is unsatisfied with the results of the investigation, the worker may continue to refuse the work provided they have reasonable grounds on which to base their refusal on.
- Should the worker continue to refuse to work, the worker should file a complaint with an Occupational Health and Safety Alberta Representative. An investigation by an OHS

Representative shall be conducted. Please refer to the continued work refusal section below for more information.

Supervisor, Manager or Safety Representative

- The supervisor, manager or safety representative must investigate the situation immediately and resolve the issue in the presence of the worker and another worker has been chosen by their peers to represent the workers.
- The supervisor, manager or safety representative should interview the worker and complete a work refusal record form to ensure sufficient information has been collected to conduct a proper investigation.
- Following the investigation, immediate steps must be taken to correct any problems or issues discovered.
- The supervisor should ensure no other worker is assigned to use or operate the tool, equipment or perform the work for which the work refusal was made until the investigation has been completed and any resolutions have been implemented.
- When the investigation has been completed, Lenbeth will prepare a written report detailing the nature of the refusal, the investigation that took place and the actions taken, if any. The worker is provided with a copy of the final written report who originally made the refusal.
- Should a worker remain unsatisfied with the resolution(s) and continue to refuse work, an Occupational Health and Safety Alberta Representative will be notified and a request for an investigation must be made. Please refer to the continued work refusal section below for more information.
- The supervisor, manager or safety representative may assign other reasonable work during the employee's normal work hours for a Worker who refused work. The worker will suffer no loss of pay or reprisal for refusing unsafe work.

Continued Work Refusal

In the event a worker continues to refuse work:

- The worker, employer, or an Representative of either must notify an Occupational Health and Safety Alberta Representative. OHS can be reached at the toll-free number 1-866-415-8690.
- Should the Representative concur the work is unsafe and is satisfied the worker has legal right(s) to refuse the work, the Representative may either direct a solution or come to the workplace to investigate the continued refusal.
- Pending an investigation and a decision from the Representative, no worker will be assigned to use or operate the machine, equipment, or tool, or work in the workplace or the workstation being investigated, unless, in the presence of another worker chosen by their peers to represent the worker that individual has been advised of the previous worker's refusal their reasons for the refusal and determines there is no risk of imminent danger.

- While waiting for the Representative's investigation to be completed, the worker must remain in a safe place near the workstation, unless the employer assigns some other reasonable work during normal working hours.
- The Representative will determine if the work is likely to endanger the worker or any other person. If the work is found to be unlikely to endanger anyone, the refusing worker is expected to return to work. If the worker continues to refuse to return to work following confirmation the assignment or work is safe, the worker can appeal the process and decision by appealing to the Alberta Labour Relations Board and complying with the process.
- If the council declares the work safe, the workers' continued refusal to return to work may be considered insubordination and disciplinary action may be initiated.
- If the work is concluded to be unsafe, Lenbeth will implement all necessary changes or precautions as recommended by the council to remove the threat of danger from the position, tools, machines, or equipment.

Payment for Refused Work

- A worker is entitled to payment at their appropriate rate when refusing unsafe work, up to the point the Occupational Health and Safety Representative rules the job is safe, or a solution to address the complaint is initiated.
- An individual person acting as a worker Representative during a work refusal is paid at either their regular rate or the premium rate, whichever is applicable.
- The company is not required to continue payment refused work has been inspected, and a safe ruling has been made, and a written decision has been issued by an Occupational Health and Safety Representative.

Appendix: Work Refusal Record Form

JOINT HEALTH AND SAFETY COMMITTEE

PURPOSE

Lenbeth has a Joint Health and Safety Committee (JHSC) compliant with the Occupational Health and Safety Act (Alberta).

The Joint Health and Safety Committee is an advisory group of employee and management individuals. This workplace partnership strives to improve health and safety depends on the committee.

Committee Structure

The Joint Health and Safety Committee (JHSC) has a minimum of four (4) members at all times. At least 50% of the committee will be comprised of staff volunteers appointed to represent the interests of the workers. Representation for management will also be appointed to the committee and will always consist of 50% or less of the total council members.

The committee will have two (2) co-chair who will be responsible for the scheduling and coordination of the meetings as well as directing the meeting itinerary. At least one co-chair will be appointed by the members representing the workers.

Term of Office

Members of the JHSC hold office for at least one (1) year. Members may continue to hold office until their successors are selected or appointed.

Meeting Schedule

The committee must meet at least once (1) every quarter. Co-chairs may call a special meeting of the committee to deal with urgent concerns as necessary. All meetings and committee activities shall take place during regular business hours.

Meeting Requirements

At least half (1/2) of the committee members must be present for there to be a quorum. This ensures a fair representation of the committee. Both workers and Lenbeth members must be present with at least half (1/2) of those present being workers.

Committee approved meeting minutes must be:

- recorded then shared with the employer and posted throughout Lenbeth workplaces or
- provided by electronic means within seven (7) calendar days of the meeting.

Copies of meeting minutes are kept for two (2) years and made readily available for inspection by JHSC members or an Occupational Health and Safety Representative.

The duties of a joint work site health and safety committee include the following:

- a) the receipt, consideration and disposition of concerns and complaints respecting the health and safety of workers.

- b) participation in the identification of hazards to workers or other persons arising out of or in connection with activities at the work site.
- c) the development and promotion of measures to protect the health and safety of persons at the work site and checking the effectiveness of such measures.
- d) cooperation with an Representative exercising their duties under the Occupational Health and Safety Act (Alberta), the regulations and the OHS code.
- e) the development and promotion of programs for education and information concerning health and safety.
- f) the making of recommendations to Lenbeth, prime contractor or owner respecting the health and safety of Workers.
- g) the inspection of a work site at regular intervals.
- h) the participation in investigations of serious injuries and incidents at the work site(s) in accordance with Section 40.
- i) the maintenance of records in connection with the receipt and disposition of concerns, complaints and the attendance to other matters relating to the duties of the Committee.
- j) such other duties as may be specified in this Act, the regulations and the OHS code.

Occupational Health and Safety Act, Part 2, Section 13

Employees are encouraged to bring their health and safety concerns to the attention of the committee. Your identity will remain confidential, and you will not be discriminated against or disciplined for bringing your health and safety concern(s) forward.

ORIENTATION AND TRAINING

PURPOSE

The goal of the training standard is to ensure all workers requiring health and safety training to complete their duties safely are provided with that training.

Training is provided to newly hired workers and management, those who have transferred internally from one job to another and those who have been promoted from workers to management. Lenbeth also provides ongoing health and safety training for workers and management. All training content and training is documented and maintained.

ROLES AND RESPONSIBILITIES

MANAGEMENT WILL:

- Provide the resources to develop, implement and maintain an effective health and safety training program.
- Assign responsibilities for training coordination to competent management employees. (e.g. orientation and other training programs deemed necessary for the health and safety of the full range of employee responsibilities.)
- Ensure selected supervisors and trainers are competent to perform the required training.
- Annually complete or review the current training needs assessment to determine the health and safety training required for management and workers.
- Review the training program annually in consultation with stakeholders and the JHSC.
- Maintain corporate training records.
- Coordinate new worker and management training program and worker orientation record (form).

SUPERVISORS WILL:

- Ensure adequate resources for department specific worker training.
- Ensure a worker has all the skill(s) and knowledge needed to protect their health and safety before the worker is assigned to a task or job.
- Coordinate and ensure the delivery of department specific orientation is provided to new, transferred or newly promoted workers. Provide ongoing skill development opportunities and to follow up on the development and application of worker skills.
- Assess those workers off work for extended periods and determine whether further training or re-training is required.
- Ensure all workers attend their assigned training sessions.
- Ensure completion and maintenance of department training checklists and records.



WORKERS WILL:

- Apply themselves in developing the skills and knowledge necessary to
 - do the job safely,
 - meet the organization's objectives, and
 - comply with the Occupational Health and Safety Act and regulations, policies, procedures, safe work practices and safe operating procedures. Including and reporting hazards to the supervisor.
- Attend training session and sign training records.

THE JOINT HEALTH AND SAFETY COMMITTEE WILL:

- Participate in health and safety training consultation program.
- Make recommendations for training programs identified through workplace inspections and observations.

TRAINING STANDARDS

Basic Training

Corporate training will be provided to all employees outlining the standardized safety policies, responsibilities, practices, procedures as laid out in this document (The Lenbeth Health and Safety Manual). This document as well as more specialized or specific safe work practice & safe work procedures will be made available to all staff on Lenbeth's Orientation Platform "Safety" so employees can re-familiarize themselves as they see fit. Employees will be responsible for understanding the contents of the "The Lenbeth Health and Safety Manual" as well as where to find all safety document resources and to review all health and safety policies and procedures not less than once every two (2) years.

Specialty Training

Additionally, specialty training may be provided to employees as deemed suitable or required by the management of Lenbeth Weeping Tile. Employees are required to participate in training at the request of Lenbeth Weeping Tile.

Appendix: Competency Assessment

Appendix: Driver Assessment

RECORDS

Training records for all employees are documented and include:

- Title of training program
- Date of training
- Instructors name
- Worker signature
- Location of the training
- Outcome of the training

Appendix: Worker Orientation Record -Training Matrix



HAZARD ASSESSMENT AND CONTROL

PURPOSE

Lenbeth takes all reasonable and appropriate actions to identify and control workplace hazards.

STANDARDS

To reduce the potential for injuries at Lenbeth, a hazard assessment of all work areas and work processes is conducted. During the workplace hazard assessment, Lenbeth identifies potential hazards which exist or may exist in work areas, work processes, and procedures.

Lenbeth employees are required to report all workplace hazards to their supervisor or manager.

Where a hazard is identified, Lenbeth determines the possibility and risk of potential injuries which could be caused or associated with the hazard.

Where possible, Lenbeth shall strive to control hazards at the source. Lenbeth shall determine appropriate safe work procedures and practices, including providing training and education in safe work practices, and procedures.

Dealing with Workplace Hazards

There is a three (3)-step process for dealing with workplace hazards.

STEP 1: IDENTIFY

Reporting any workplace hazards to your immediate supervisor or manager. Recognition involves both identifying a hazard and determining if there is a possibility of workers being adversely affected by it. If such a possibility exists, it must be assessed, and the hazard must be controlled. Employees are required to immediately report any workplace hazards to their immediate supervisor, to reduce the dangers to all other employees.

STEP 2: ASSESS

Determine the level of risk associated with the hazard. Discontinue work if a workplace hazard creates increased risk and the potential for excessive exposure to dangerous work conditions.

STEP 3: CONTROL

Lenbeth uses all elements available to address and resolve dangerous workplace hazards. Controls can be applied at the source of the hazard, along the path between the source and the worker, or at the worker. Control at the source of the hazard is preferred, such as the guard on a table saw.

Hazard Control

Where a workplace hazard is identified, Lenbeth utilizes the following process to ensure workplace safety:

STEP 1: ELIMINATE / SUBSTITUTE / ENGINEERING CONTROLS

Where possible, hazards are eliminated or mitigated through engineering controls, including the substitution of hazardous materials, work processes or equipment used with less hazardous options, the isolation of hazardous work to physically remove the Worker from the hazard, or through ventilation of the area.

STEP 2: DESIGN OF SAFE WORK PRACTICES

Lenbeth designs safe work practices providing guidelines for working safely with workplace hazards, and limit exposure to hazards.

STEP 3: ADMINISTRATIVE CONTROLS

Lenbeth employs administrative controls, including job rotation schedules, work-rest cycles and timing of maintenance procedures to limit the amount of time workers are exposed to hazards.

STEP 4: PERSONAL PROTECTIVE EQUIPMENT (PPE)

Where appropriate, PPE designed to reduce or eliminate a hazard shall be required.

STEP 5: EDUCATION AND TRAINING

Lenbeth provides staff with the appropriate training and education in safe work practices when working with or near identified workplace hazards.

CONDUCTING A HAZARD ASSESSMENT

- Assemble the people who need to be involved.
- Discuss possible hazards with employees. Tour the entire workplace or work site.
- Look for and identify possible hazards whether they are environment, material, equipment, and people.
- Keep asking “What If?”
- Mark on a checklist all items that need attention.
- Review the findings with the supervisors and workers soliciting their input for control measures.
- Rank the items on a “worst first” basis; from 1-5. The first ranking estimates the severity of the problem if a potential accident (incident) were to occur.

1. Imminent Danger (i.e., causing deaths, widespread occupational illness, loss of facilities)



2. Hazardous (i.e., severe injury, serious illness, property, and equipment damage)

3. Low Risk (i.e., non-serious injury, illness, or damage)

4. O.K. (i.e., minor injury requiring first aid or less)

5. Not Applicable (N/A)

- Take corrective action and make recommendations for the control of hazards.
- Monitor and follow up to ensure corrective action is taken.

APPENDIX: HAZARD ASSESMENT FORMS



WORKSITE INSPECTIONS

PURPOSE

Lenbeth maintains a comprehensive program of safety inspections at all facilities and work sites. To control losses of human and material resources by identifying and correcting unsafe acts and conditions.

RESPONSIBILITIES

Management and Safety are responsible for the worksite inspection program.

Managers and the Safety Representative are responsible for directing formal safety inspections on the job sites they control involving workers in such inspections.

Formal safety inspections are done on a regular basis. Previous inspection reports are reviewed, and a new inspection form is completed, with safety conditions noted accordingly. Any conditions requiring corrective action are followed up.

Managers and the Safety Representative are responsible for conducting ongoing informal safety inspections of areas where work is being done.

Ongoing informal safety inspections require the Safety and Managers to constantly watch for unsafe acts and conditions. A problem could be corrected by discussing the problem with a worker or issuing instructions to have the condition corrected. Situations requiring additional corrective action are recorded for follow-up.

Workers are responsible for participating in and completing work site inspections.

PREVENTATIVE MAINTENANCE PROGRAM

All tools, vehicles, and equipment shall be properly maintained to reduce the risk of injuries to workers or damage to property.

Managers shall ensure all preventative maintenance is carried out by qualified personnel according to the established schedules and records are maintained.

All workers shall regularly check all tools, vehicles, and equipment they are working with, any tools, vehicles, or equipment posing a hazard are taken out of service.

A locked compound of tools and equipment is located at the main office, known as the "Tool Crib". Workers must see the Tool Crib Supervisor for supplies. The worker must inspect the tools and equipment using the inventory and inspection checklist or on their FLHA to ensure the tools and equipment are in safe working condition. If the tool or equipment is not in safe working order, they must notify supervisor or the proper people to ensure the tools or equipment are sent in for proper maintenance.

Appendix: Inventory and Inspection Checklist

Appendix: Jobsite Inspection Form

Appendix: Hazard Assessment and Control Report

SAFE WORK PRACTICES AND SAFE JOB PROCEDURES

PURPOSE

A safe work practice or a safe job procedure is based on experience, applicable workplace health and safety regulations, and the appropriate step-by-step measures to complete the job. A hazard assessment is used to develop such safe work practices or safe job procedures.

STANDARDS

Development

Safe work practices are developed after completing a hazard assessment. Safe job procedures are developed by management and workers after a hazard assessment, incident investigation, are completed as a supplement to a safe work practice.

Delivery

All safe work practices are kept in a location central to the work being performed and readily available to the workforce. Safe job procedures are included in Lenbeth's "New Hire Orientation" program. All workers should be aware of the established safe job procedures and must follow them.

This would include but not limited to:

- General worksite safety
- The usage of tools and equipment
- CSTS
- Handling, usage & transport of materials under WHMIS (also discussed on pages 49-52)

Appendices:
Safe Job Procedures
Safe Work Practices



PERSONAL PROTECTIVE EQUIPMENT (PPE)

PURPOSE

Lenbeth takes every reasonable precaution to protect workers; including requiring them to wear Personal Protective Equipment (PPE) throughout the course of their job duties.

All PPE used by Lenbeth and its employees must be maintained in accordance with the manufacturer's instructions and requirements. Lenbeth issued PPE is inspected at the time of issue and before each use by the employee at the worksite or workplace.

All PPE damaged or in need of service or repair will be removed from service immediately. All PPE removed from service will be tagged "Out of Service."

Any PPE tagged "Out of Service" cannot be returned to service until repaired and inspected by a qualified person.

Failure to wear the required safety equipment may result in disciplinary action up to and including termination.

STANDARDS

Personal Protective Equipment (PPE) will be provided, used, and maintained when it has been determined its use is required to ensure the safety and health of a worker lessening the likelihood of an occupational injury and/or illness.

Personal Clothing

Employees shall be properly attired in clothing appropriate for work. Employees must wear clothing that provides ample protection from weather and other hazards.

When working with moving parts or equipment, tools or machinery, the clothing must not be torn, ragged or loose. High-visibility apparel must be worn at all times.

RESPONSIBILITIES

Supervisors and Managers

Supervisors and Managers have the primary responsibility for implementing and enforcing PPE use in their work area. This involves:

- Providing appropriate PPE and making it available to workers.
- Ensuring workers are trained on the proper use, care, and cleaning of PPE.
- Ensuring PPE training certification and evaluation forms are signed and given to the Safety Representative.
- Ensure employees properly use and maintain their PPE following Lenbeth's PPE policies and rules.
- Notifying Lenbeth management and the Safety Representative, when new hazards are introduced or when processes are added or changed.
- Ensure defective or damaged PPE is immediately disposed of and replaced.



Lenbeth expects all workers, or subcontractors to comply with applicable safe work practices or procedures and the use of PPE as deemed applicable to the job. However, if Lenbeth determines whether a worker, subtrade or subcontractor is in violation of current OHS legislation as Lenbeth will request the worker or subcontractor rectify the situation.

Workers

The worker using PPE is responsible for following the requirements of the PPE. This involves:

- Properly wearing PPE as required.
- Attending required training sessions.
- Properly caring for, cleaning, maintaining, and inspecting PPE as required.
- Following Lenbeth PPE policies and rules.
- Informing the supervisor of the need to repair or replace PPE.

All workers are trained in the proper selection, use, inspection, cleaning, maintenance, and storage of PPE for their specific job tasks. No exceptions.



EMERGENCY PREPAREDNESS PLAN

PURPOSE

Lenbeth believes providing a safe and healthy work environment also includes the necessity for having an Emergency Preparedness Plan to reduce or prevent human injury and property damage during critical events.

PROCEDURES

At each job site the supervisor and all workers should be aware of the location of the nearest hospital and fire station. Also, everyone on the site(s) should be aware of the other people on the site(s). All emergency numbers should be clearly posted. This information helps to prevent confusion during an emergency situation.

Site(s)/Structure Fire Prevention Activities

- Regularly and through the work hours, remove all excess material from construction activities from the site. Excess material or packaging is not to be left on any site.
- All excess garbage shall be removed from site on a regular basis to prevent the accumulation of debris/packing piles exceeding 3 m³ (4 yd³) in size.
- Ensure access to the structure is not impeded by material or debris.
- Remove all flammable products (accelerants) from the site at the end of the workday. Any product with a flammable WHMIS symbol is required to be removed from any structure when work is completed for the day.
- At all times ensure there is access/egress to all areas where workers are present.
- All workers and contractors using flammable materials shall ensure the combustible material is away from any possible ignition source (i.e., generators, chainsaws, etc.)
- Ensure vehicles or trailers are not obstructing access to fire hydrants to the area.

Fire Extinguishers

- All workers and contractors must have a minimum 4A40BC fire extinguisher in their work vehicle while conducting any activities that could result in a fire.
- All fire extinguishers shall be properly maintained and inspected on a yearly basis.
- Monthly checks shall be conducted and the name of the person conducting the check shall be noted on the tag.
- All fire extinguishers shall be at or near
 - any work activity with gas or propane operated equipment.
 - any hot work operation on site including but not limited to cutting torch, welding, soldering, grinding or metal cutting.

Hot Work Operations

- Any flammable or combustible materials or liquids shall be removed from the area prior to commencing any work.



- Check the area continuously after the work is completed for the first sixty (60) minutes then once every four (4) hours after the work has been completed.
- Inspect the area at the end of the workday.
- Fire extinguishers shall be in the immediate area while doing any hot work operations. Ensure proper ventilation is maintained.

Flammable or Compressed Gas Storage

- All flammable materials are kept outside of the structure at all times a minimum of 3m (10ft) from the structure or property line.
- Refueling gasoline or diesel fueled equipment shall be done outside of all structures.
- Portable pressurized propane tanks shall be a minimum of 3m (10ft) from access or egress routes of any structure.
- All workers and contractors shall have a fire extinguisher available for use on site.

EMERGENCY PROCEDURES

In all situations deemed an emergency

- Ensure everyone evacuates the building and meets at the designated Muster Point (Muster Point is a predetermined location at all workplaces and work site locations including show homes).
- Remove everyone from the area who may be in immediate danger due to the situation.
- Know where each of the exits are and be sure they are not locked or blocked off.
- Do a personnel count (roll call) to ensure all Workers at the site have been evacuated.

Fire in a Building Under Construction

- Call the Fire Department (911) and provide the address of the site.
- Sound the alarm by shouting, inspecting the site and ensuring all sites surrounding the building are clear.
- Assess the situation and if the fire is small enough try to extinguish the fire if there is no possibility of sustaining an injury or placing others in danger.



Leaking Gases and Liquids

- STOP – Turn off all equipment.
- CALL 911 (for Emergency Rescue) or appropriate emergency phone number **KNOW** the location of all extinguishers and how to use them.

NOTE: Keep out of low areas. Do not feel compelled to control the hazard. Use your powers of observation and hearing to detect and avoid:

- Hazards
 - Hissing sounds of gases
 - Downed wires Leaking Fluids
 - Flames, smoke and steam, etc.
 - WARNING placards are appropriately located throughout all sites and potential risk locations.
- Protect yourself first, then others. Try to contain the blaze with a fire extinguisher or shut off leaking gases or fluids.
 - Evacuate the site and any neighboring sites or homes if the fire cannot be put out, or gases or liquids cannot be contained.

If You Must Rescue Victims:

- Keep upwind in the event of hazardous goods, spills, leaks or fires.
- Administer first aid to maintain life
- keep unnecessary people away.

Action in Case of Explosion

Leaking gas, faulty heating equipment, and flammable vapors can cause explosions. Take the following actions in this emergency:

- Fall to the floor or ground and take immediate shelter under tables, desks or other such objects that ~~will~~ offer protection against flying glass or debris.
- Protect your face and head with your arms.
- After the effects of the explosion have subsided, check the exits or exit stairways prior to evacuating the building or site.
- Contact the fire department by calling 911.
- Do not return to the building or site until the “all clear” signal is given by the Fire Emergency Representative or designate.

OFFICE – FIRE EMERGENCY EVACUATION PROCEDURE

Our fire **OFFICE TEAM** consists of:

- Office Manager – Main Office (Angela Foster)
- Construction Manager – Back Shop and Commercial Bays (Clint Small)

It is imperative all occupants respond promptly to orders or directions given by the Fire Team or members of the Fire Department.

Smoke

Keep low when exiting a building if smoke is present.

Persons with disabilities

The Manager should be aware of anyone requiring assistance to leave the building. The Manager will assign other staff to assist individuals who may have physical or auditory impairment to exit the building and move to the Muster Point.

Control

Panic is one of the greatest dangers in an office building fire and is one of the greatest causes of loss and injury. The best way to avoid panic is to know in advance what action you should take and to follow the direction of the Manager or their designated alternate.

Office Exit Instructions

During Normal Office Hours:

- When the alarm sounds, go immediately to the nearest exit and follow the instructions of the exit monitors.
- Proceed to the front of the reception area exit,
- Form a single line and remain calm and quiet. Proceed at a walking pace.
- Do not run or push.
- Once you have exited, move away from the building and stay with your co-workers and colleagues. Move to the Muster Point.
- Meet at Muster Point at the front of the building directly across the street from the Lenbeth main door.
- Do not attempt to re-enter the building until advised by the Fire Department or its Representative that it is safe to do so.



After Normal Business Hours

- When the alarm sounds,
 1. close your office door and
 2. leave the building immediately via the closest exit.
- Upon exiting the building move out and away from the building. Go to Muster Point.
- Do not attempt to re-enter the building until advised by the Fire Department.

To Raise an Alarm

If you discover fire or smoke in the building, signal the alarm by pulling the area alarm box. Alarms are the small red boxes mounted near an exit door.

OFFICE – WORKPLACE THREAT PROCEDURE

Threats can be received by a number of different ways including telephone, letter, email, social media, etc. If someone receives a threat, any clues can be helpful to authorities. If the threat is received by telephone, the individual receiving the threat must pay close attention to background noises, gender of the caller, vocal characteristics, etc. If an employee receives a threat, they shall:

- Remain calm, do not panic.
- Notify their Supervisor, the Owners, Office Manager or appropriate authority immediately.
- The person receiving a threat over the phone should attempt to get as much information as possible without aggravating the caller so informed actions can be taken.
- Try to obtain as much information as possible about the caller, i.e. voice, race, male, female, affiliation with a political group, etc.
- Listen for the background noises, voices or anything else that may give a clue as to who is calling and their location.
- The information received should be carefully noted for the authorities.
- Immediately relate the information to the City Police at 911.
- If the threat is by mail preserve the letter or card for further investigation by the proper authorities.
- If you receive a suspicious package, do not touch the object. Advise people in the immediate vicinity of the package and stay clear.
- Vacate the building and go to the nearest Muster Point until the authorities arrive.
- Keep all communication on hand (letters, email) and provide it to management.
- At the earliest convenience, fill out an Incident Investigation Report, detailing the sequence of events (step by step breakdown, times, etc.).

Management shall:

- Determine the best course of action, this can vary depending on the likelihood of immediate harm and nature of the threat.
- Report the threat regardless of perceived harm to 911 Edmonton Police Services (EPS)
- Document and report sequence of events to aid the EPS or any relevant authorities.
- Document all instances (timeline)

Appendix - Emergency Phone Numbers

Appendix - Incident Investigation Report

Appendix – Emergency Drill Evaluation

Appendix – Emergency Response Map (Office)

WORKPLACE INJURIES AND FIRST AID

POLICY

All Lenbeth Group superintendents and their assistants are fully trained and certified in basic first aid and have a #2 First Aid Kit readily available for use. First aid treatment information is reported to the Safety Representative, together with any investigation reports for all incidents and incidents, no matter how minor.

PROCEDURES

First Aid Requirements

First aid supplies and resources comply with CSA Standard Z1220-17.

Reporting Workplace Injuries

- Every worker must immediately report all incidents and near-misses, no matter how small, to their immediate manager and / or the Safety Representative.
- All Lenbeth staff members are required to complete an incident report in the event of a health and safety violation that the employee has either caused or witnessed. Incident reports should be filled out and submitted to management promptly to ensure the safety of other employees, and to rectify the problem as quickly as possible.
- Incidents that result in the death or serious injury, of an employee must be immediately reported to the Government of Alberta Workplace Health and Safety Contact Centre: 1-780-415-8690 (Local Edmonton) or 1-866-415-8690.

Failure to comply with Lenbeth's health and safety guidelines or engage in conduct which creates a risk for a worker, contractor, customer or visitor, may be met with disciplinary action up to and including termination.

Manager and Supervisor

- Ensure first aid is given immediately to your appropriate level of training within the regulations.
- Ensure a notification is made to the Safety Representative of any injury, or the possible onset of a work-related disease/condition.
- Keep a record of the first aid treatment or advice given to the worker on the Incident Report.
- Provide the worker with immediate transportation to a hospital, a doctor's office, or the worker's home, if necessary.
- A WCB Employer's Report of Injury/Disease shall be completed when worker:
 - receives medical aid.
 - is absent from regular work (lost time)
 - requires modified duties at less than regular pay.



- requires modified work at regular pay for more than seven calendar days after the date of the accident.
- earns less than regular pay at regular work.
- Pay full wages and benefits for the day or shift on which the injury occurred.
- Cooperate in the worker's safe return to work.
- Cooperate with all requests for information from the WCB.

Lenbeth is required to report any incident or injuries to the WCB within seventy-two (72) hours of acquiring knowledge of the incident or the allegation of an incident. Lenbeth will also provide a copy of the report to the injured party for their records. However, Lenbeth strives to report all incidents as soon as reasonably possible within seventy-two (72) hours of acquiring knowledge of the incident. The sooner a worker reports an injury to their manager, the sooner it can be properly reported to the appropriate authorities.

Worker

1. Get first aid right away. First aid includes but is not limited to: cleaning minor cuts, scrapes, or scratches; treating a minor burn, applying bandages and/or dressings, cold compresses, cold pack, ice bag, splint, changing a bandage or a dressing after any follow-up for observation purposes only.
2. Notify the department manager or the immediate supervisor of any injury or the possible onset of a work-related disease or condition.
3. Claim WCB benefits by completing a WCB Worker Report of Injury or Occupational Disease form. Workers must give Lenbeth a copy of the completed form at the same time they give a copy to the WCB. In the case of occupational diseases, Workers must give a copy of the claim to the employer who most recently employed them in the employment to which the disease is associated. (**note:** Subcontractor is obligated to report the same to Lenbeth within the bounds of privacy. Lenbeth may elect not to seek this information until being notified of a claim to manage their experience rating and claims management processes.)

Compliance

Due to the serious nature of workplace injuries and the importance of accurate and timely reporting, Lenbeth employees are expected to fulfill their obligations regarding the correct reporting of workplace injuries.

If a workplace incident is not properly reported, Lenbeth may be subject to penalties:

Appendix – WCB Employer's Report of Injury/Disease

Appendix - WCB Worker Report of Injury/Disease

Appendix – Modified Work Agreement

WORKPLACE INCIDENT INVESTIGATION

PURPOSE

An incident investigation looks at what caused the incident, both directly and indirectly. The goal of the investigation is to identify the root causes of the incident. The purpose is not to lay blame, but to seek out new processes so the incident does not reoccur.

The following guidelines for the protection of evidence in the event of a workplace incident and are designed to be compliant with the Alberta Occupational Health and Safety Act and Code.

STANDARDS

The following types of incidents shall be fully investigated:

- Incidents resulting in injuries requiring medical aid.
- Incidents causing property damage or interrupt operations with potential loss.
- Incidents have the potential to result in close calls or near miss incidents.

All incidents falling under Section 33 of the Alberta Occupational Health and Safety Act must be reported to WCB or other regulatory agencies as defined by the Act.

Specifically, Incidents falling under section 33 are:

- a) an injury, illness or incident that results in the death of a worker,
- b) an injury, illness or incident in which there is reason to believe the worker has been or will be admitted to a hospital beyond treatment in an emergency room or urgent care facility,
- c) an unplanned or uncontrolled explosion, fire or flood that causes a serious injury or illness or that has the potential of causing a serious injury or illness,
- d) the collapse or upset of a crane, derrick or hoist, and
- e) the collapse or failure of any component of a building or structure necessary for the structural integrity of the building or structure.

Procedures for Preserving and Collecting Evidence

- Lenbeth Workers must immediately inform Management & Safety Representative of the incident and the incident scene; without preventing emergency services from accessing the injured party.
- All Lenbeth employees and Management & Safety Representative must preserve the incident scene so information may be gathered to educate Workers, or to change conditions for the prevention of any future incidents.
- Lenbeth Management & Safety Representative begins the process of evidence collection as soon as possible following a workplace incident. This ensures memories are fresh, and evidence has not degraded.
- The preservation of evidence allows Lenbeth to reconstruct the sequence of events leading to the incident and discover any underlying factors present.

- If there are not any witnesses present at the incident, the incident scene evidence is the only way Lenbeth can reconstruct the events leading to the incident.
- The following methods are to be used (as necessary) by Lenbeth workers and managers & safety representatives to preserve evidence:
 - Ensuring only the first aid respondents and Emergency Medical Services personnel are permitted at the incident site.
 - Removing any people not involved in the rescue from the site.
 - Immediately shut down any machinery which may have been involved.
 - Stringing caution tape to prevent unwary workers from accessing the incident site.
 - Developing alternate routes for workers who require a pathway where the accident took place.
 - Taking photos or videos of the incident site.
 - If the workplace uses a security camera(s) and recording system, ensure access is severely restricted to the security room.
 - Copy the file to a secure drive or other media for safekeeping.
 - If the incident has taken place outdoors, it may be necessary to cover the site with plywood or a board until monitoring equipment can be retrieved.
 - If possible, individuals or guards should be posted at the incident site to restrict unauthorized access.
- Evidence may only be displaced to guarantee the safety of other persons should they be required to walk past the incident scene area.
- Emergency Services and individuals trained in first aid are permitted to move evidence to access the injured party.
- All Lenbeth workers and management must fully cooperate with any authorities dispatched to the accident scene.
- Employees and management should refrain from speculating on the incident until there has been a thorough investigation and the findings are released (where appropriate).

Appendix: Incident Investigation Report

Appendix: Witness Statement

WORKING ALONE

PURPOSE

Working alone is considered a safety hazard. This procedure has been developed to minimize the hazards associated with working alone.

PROCEDURES

Employees have been divided into two (2) risk categories: office staff and field staff. The following procedures have been developed based on hazard assessments completed on each risk category.

Generally, all employees are provided with a phone, whether a landline (as in the office situation) or a cell phone (in the field).

All employees must follow the buddy system approach when working alone. The buddy system includes the immediate Supervisor, Construction Manager and family connections. Safe Job Procedures have been written for each risk category and vary with the risks involved.

When an Employee finds themselves working alone, they are required to follow the following guidelines.

Office Staff

Job Steps:

1. Ensure all doors to their work area are locked.
2. Use a phone in case of emergency to notify the proper authorities.
3. Use an alarm keypad if necessary.
4. Ensure someone (other employee, home contact) is aware you are at the office.
5. All staff should phone home before leaving for the day.

Field Staff

Job Steps:

1. Supervisors and Managers must have cell phones turned on and on their person at all times, including weekends for emergency purposes.
 - a) If in a meeting and the cell phone must be turned off ensure someone is aware of the situation
2. Workers working alone must call their designated manager at the end of the day.
3. If contact cannot be made, then the Manager must notify the Safety Representative for follow-up and instructions.
4. All other field staff should contact the Construction Manager at the end of the workday.
5. It is the Construction Managers' responsibility to follow up missed calls.
6. All Workers should phone home before leaving for the day.

CONTRACTOR SAFETY MANAGEMENT

PURPOSE

Lenbeth's contractor management system is a process of pre-work assessment of a contractor's OHS management, approval to undertake work for Lenbeth including the ongoing checking and monitoring of contractors OHS management performance. Lenbeth's contractor management system is designed to enable the sharing of information and continuous improvement.

This standard provides requirements which Lenbeth's managers, supervisors, contractors, and subcontractors must follow when engaged by Lenbeth for any work. Lenbeth's objective is for contractors to meet all Lenbeth's and Occupational Health and Safety Act requirements.

This standard is for all contractors providing services to Lenbeth whether on a long-term or short-term basis.

STANDARDS

Roles and Responsibilities

Lenbeth managers and supervisors are responsible for:

- Pre-contract assessment and approval (where granted) of contractor OHS management.
- Establishing an approved contractor list.
- The scheduling and completion of contractors OHS Induction.
- Ensuring contractors' proposed work methods do not place themselves or Lenbeth employees at risk in relation to site specific hazards.
- Advising the relevant Manager or Supervisor when the Contractor work will be conducted in the workplace.
- Checking, monitoring and auditing Contractors' performance and documentation.
- Applying the respective Contractor disciplinary processes when required.

Lenbeth employees are responsible for:

- Not placing themselves or Contractors at risk of injury
- Assist Contractors where required to develop and implement safe work practices.
- Reporting noncomplying work methods of contractors to Lenbeth Management

Contractors are responsible for:

- Complying with Contractor Management Standards as set out in their agreements with Lenbeth.
- Providing OHS information to Lenbeth relevant to the contract when requested.
- Developing site-specific procedures relevant to site hazards and work activities at the site.
- Successfully completing Lenbeth' Contractor? OHS orientation.
- Not placing themselves or others at risk of injury.
- Working in accordance with Lenbeth, OHS standards, procedures and practices.
- Reporting any incidents, injuries, or non-compliance to Lenbeth Management
- Taking part in Lenbeth Contractor Audits demonstrating full compliance and release of information.

Note: Failure to comply with the requirements of these standards by the Contractor or subcontractor may result in termination of the contract.

How Lenbeth Manages contractors on site

During the contract work Lenbeth must monitor for compliance with the plan and ensure unforeseen issues are addressed promptly. Lenbeth will:

- Monitor the work.
- Require appropriate documentation.
- Manage new hazards.
- Manage incidents.
- Assess risk before handover.

Monitor the Work

Self-assessment is encouraged and supported by Lenbeth. Lenbeth ensures the monitoring will:

- Not be a 'policing' role.
- Check compliance to relevant legislation.
- Check adherence to standards and controls.
- Check adherence to OH&S action plan.
- Check continuing hazard studies as necessary.
- Ensure opportunities to develop cooperation.
- Maintain good community relations with contractors.
- Monitoring Contractor's OHS Performance

Extent of Lenbeth' supervision is influenced by:

- Level of risk
- Complexity of tasks
- Organizational control of the workplace
- Interaction with other parties and works on site.
- Duration of works
- Monitoring & Supervision Key

Lenbeth will.

- Review, monitor and supervise contractors consistent with OHS legislation and best practices.
- Regular site inspections
- Provide advice on risks & non-compliance.
- Ensuring corrective action taken
- Integrate OHS in review meetings.
- Monitor & Supervision of Documentation

Review of Contractor OHS documentation includes:

- Hazzard Assessments
- Employee training/competency records
- Safety meeting minutes
- Health & safety inspection reports
- Incident Reports

Lenbeth Ensures Corrective Action is taken by:

- Issue non-conformance report
- Review and confirm corrective action implemented.
- Issue of formal notice when action not taken to:
 - suspend work.
 - terminate contract.

Appendix - Contractor Health and Safety Agreement

WORKPLACE HAZARDOUS MATERIAL INFORMATION SYSTEM (WHMIS)

PURPOSE

WHMIS is one of the tools Lenbeth uses to protect the health and safety of our Workers. It ensures our Workers have the information, education and training they need to work safely with hazardous chemicals.

PROCEDURES, PRACTICES, STANDARDS

In Alberta, WHMIS applies to all workplaces covered by the Occupational Health and Safety Act, and to all federal government workplaces.

- Lenbeth meets all provincial legislative standards as outlined in the Alberta Occupational Health and Safety Code specifically:
 - a) Part 29 Workplace Hazardous Materials Information System (WHMIS) and (Sections 395 to 414) and ensures information and training on hazardous materials is provided to all Workers.
- Lenbeth ensures all containers holding hazardous materials have appropriate labels and are less than three (3) years old.
- Lenbeth ensures Material Safety Data Sheets (MSDS) are available to provide additional information including detailed hazard and precautionary information.
- Lenbeth ensures all workplace hazardous materials include Supplier labels, providing the appropriate supplier labels and accompanying MSDS.
- Lenbeth shall ensure Workers have full access to supplier labels and MSDS information.
- Under WHMIS, there are three (3) ways hazardous materials information is provided:
 - a) Labels on the containers of hazardous materials, labels on temporary containers of hazardous materials.
 - b) Material Safety Data Sheets (MSDS) to supplement the label with detailed hazard and precautionary information about a chemical's classification.
 - c) Worker education programs where Workers are provided with two (2) different types of information. One is a general overview of WHMIS, the other is specific hazard information and safe work procedures form for use in their workplaces.

Controlled Products

WHMIS legislation applies to specific chemicals which are labeled controlled products. They are subdivided into six different classes:

1. Compressed Gas.
2. Flammable and Combustible Material.
3. Oxidizing Material.

4. Poisonous and Infectious Material.
5. Corrosive Material; and
6. Dangerously Reactive Material.

GUIDELINES

- Whenever possible, non-hazardous or less hazardous materials should be substituted for hazardous materials.
- Hazardous materials shall be used in a safe and conscientious manner.
- Quantities of hazardous materials should be kept to a minimum.
- Hazardous materials must be stored in appropriate places. Refer to Safety Data Sheets (SDS) for storage safety information.
- All hazardous materials must be labeled in compliance with WHMIS requirements. Hazardous products may not be used in the workplace if the correct label is not attached. There are two types of labels: supplier and workplace label.
 - ***Refer to WHMIS regulations for direction on labeling requirements.***
- Exercise proper personal hygiene. Precautions must be taken to block all routes of entry to chemicals to your person and to minimize occupational exposure. Use multiple containment systems; wear appropriate Personal Protective Equipment (PPE) including clothing and equipment.

Employer Responsibilities

An employer in charge of a worksite where controlled products are used has specific duties to perform including:

- Ensure all controlled products are labeled or identified with appropriate WHMIS labels.
- Ensure WHMIS MSDSs are up to date (can be no more than three (3) years old);
- Ensure WHMIS MSDSs are provided for all controlled products at the worksite and the MSDSs are easily accessible to any employees at the work site.
- Ensure Workers have received the appropriate WHMIS Worker education to protect their health and safety.
- The employer must also ensure that until the supplier container is empty, the supplier label is not deliberately removed, destroyed, or changed.
- The employer is obligated to consult the Safety Representative about the content and delivery of the education program.

Employee Responsibilities

- Lenbeth employees must be aware of where they can find WHMIS & MSDS information and resources supplied by both the employer and the manufacturer.
- Lenbeth employees must ensure they are familiar with the proper handling and usage of any materials detailed under WHMIS beforehand. If not, they will refer to employer resources and procedures as well as the manufacturers labelling.



- Lenbeth employees must participate in WHMIS training and education if it is deemed necessary by the employer.
- Lenbeth employees must cooperate with Lenbeth to protect their own personal health and safety as well as the health and safety of all others at the worksite.
- Lenbeth employees must report any violation of the Act or regulations to their immediate Supervisor, Manager, and the Construction Manager or Safety Representative.
- Lenbeth employees shall inform their immediate Supervisor, Manager, the Construction Manager or Safety Representative in the event they do not have the proper information on a controlled product, e.g., the MSDS is missing, damaged or illegible.

Employee Rights

WHMIS gives workers the right to know about the hazardous materials they are exposed to on the job.

This includes:

- The right to review labels and MSDS and to receive instruction and training.
- The right to be consulted regarding the development and implementation of the instruction and training.
- This means workers have the right to be included in discussions of the content of the program, the amount of training, who is to receive what training, who delivers the training, etc.

Training and Education

Lenbeth provides the appropriate WHMIS training and education for all workers who are exposed to or likely to be exposed to hazardous materials in the performance of their regular job duties.

Lenbeth Workers are compensated for time spent at training sessions, considered to be normal work time, and Workers are paid at the regular rate.

The education is considered sufficient when Workers can answer the following four questions:

1. What are the hazards of the controlled products?
2. How are you protected from these hazards?
3. What do you do in case of emergency?
4. Where can you get additional hazard information?

Follow-Up Education

Lenbeth reviews the education program at least once a year or more often in the event that:

- Conditions at the workplace change; or
- New information on controlled products becomes available.

- The review must take place in consultation with the Safety Representative. In the event of any changes, Workers will be trained and educated regarding the changes.



COMMERCIAL VEHICLE PROGRAM

OVERVIEW

All NSC commercial vehicles (commercial vehicles registered solely or in combination for more than 4,500 kilograms including but not limited to trucks, truck tractors, trailers, converter dollies, jeeps and boosters) registered to the company are required to comply with the company's maintenance and inspection program policies and procedures.

The preventive maintenance and inspection program will address the following areas:

daily trip inspections; repairs; routine scheduled maintenance; annual CVIP inspections; record keeping of all inspections, repairs, routine maintenance, including CVSA and CVIP.

A person shall not operate or permit another person to operate a commercial vehicle if the vehicle or any equipment related to the commercial vehicle is in a condition likely to cause danger to people or property.

It is illegal to operate a vehicle on a highway with any defect that is a violation under any legislation.

The company's written maintenance and inspection program will be kept at the company's principal place of business in Alberta. Copies of the maintenance and inspection program will be available at each location of the carrier where the maintenance and inspection of the carrier's commercial vehicles is carried out. A copy of the program shall be readily accessible to employees of the carriers who carry out the maintenance and inspection program. Designation of Maintenance Officer

The person is responsible for maintaining and implementing this preventative maintenance program:

Name: Jim Storoschuk
Phone: 780 4769159
Email: Jim@lenbeth.com
Title: President



DECLARATION OF COMMITMENT TO TRANSPORTATION SAFETY

I/we, the company's authorized representative(s), are committed to ensuring all employees are aware of and dedicated to following transportation safety laws as outlined in this safety and maintenance program. I/we are committed to ensuring the designated safety officer has the necessary resources to ensure the implementation of this program.

I/we acknowledge that an audit may be conducted on our operations at any time to measure our compliance to regulatory requirements. Should deficiencies be identified during the audit, I/we understand that disciplinary actions may be taken including but not limited to, the issuance of administrative penalties and the Safety Fitness Rating downgraded.

I/we certify that the information disclosed is true and accurate. I/we acknowledge that providing false or misleading information may result in the suspension or cancellation of the Safety Fitness Certificate and/or vehicle registration. I/we acknowledge that providing false or misleading information may also result in being charged with offence(s) or administrative penalty(s).

This declaration must include individuals named on the vehicle registration. When vehicle registration shows a corporate, society or organization name, include the owner(s), manager(s), or director(s).

Jim Storoschuk

Signature: 
Jim Storoschuk

Position: President/Owner

Date: January 32, 2025

Phone: 780-476-9159

Email: Jim@lenbeth.com

Designation of Safety Officer

The person responsible for maintaining and implementing this safety and maintenance program is:

Name: Rose Graham

Position in Company: Director of Compliance

Phone: 780 476 9159

Email: safety@lenbeth.com

Appendix: Commercial Transportation Program
Forms

WASTE MANAGEMENT AND ENVIRONMENTAL PROGRAM POLICY

At Lenbeth Weeping Tile, we are committed to the responsible stewardship of our environment. We recognize that the protection of human health, wildlife, plant life, air, water, and soil is essential to the long-term sustainability of our community and planet.

Our guiding principles are as follows:

- Employees are expected to prioritize the protection of the environment in their daily activities. We believe it is possible to achieve our operational goals while minimizing environmental impact.
- We will use, store, and dispose of products and materials in a manner that protects the environment. This includes reducing waste, minimizing pollution, and following best practices for product handling.
- Management is responsible for ensuring that our environmental standards align with all relevant local, provincial, and federal legislation. We will regularly review and enforce policies to ensure compliance and continuous improvement.
- All employees will receive training and ongoing communication to understand their role in reducing environmental harm and minimizing waste. Our workforce will be empowered to make environmentally conscious decisions.
- We will actively seek opportunities to recycle materials and promote the use of recycled products. Where feasible, we will implement practices to reduce consumption and waste across all areas of operation.

We will regularly review and enhance our environmental policies and practices to reflect new technologies, regulations, and sustainability goals.

Appendix - Spill Procedure

Appendix - Spill Report



FITNESS FOR DUTY PROGRAM

PURPOSE

As an industry leader, Lenbeth Group of Companies (the Company) has set a goal for its operations of zero workplace incidents or injuries. The Fitness for Duty Program (the Program) is a cornerstone in the Company's efforts to achieve and maintain that goal.

IMPLEMENTATION

The Company has reviewed the operational, social, medical, ethical and legal aspects of instituting the Fitness for Duty Program. While each of these factors is in constant flux, the Company recognized from past incidents the need to take a stand and establish a Program that both recognizes and seeks to eliminate the problem while at the same time protecting and supporting our valued employees.

Focused on safety, prevention and treatment, this Program will apply to all positions within the Company. In addition, the Program details the way in which the rights and obligations of contractors and their employees assumed under contract and the Company's Site Access Agreement will be enforced (see specifically Section VI).

Notice of the Program summarizing key elements will be circulated by email periodically to all employees and contractors, with copies of the full Program to be distributed and receipt acknowledged as per the attached Certification. Violation of this Program will be grounds for intervention as outlined below and may lead to progressive disciplinary action up to and including dismissal. Employees who may have drug or alcohol abuse problems are encouraged to seek assistance prior to such problems affecting on-the-job performance and the safety of their co-workers.

In the event of any inconsistency between the Human Resource Policy and Procedures or any other Company policy or procedure and the Fitness for Duty Program, the provisions of this Program will prevail.

STATEMENT OF PHILOSOPHY

The operating procedures and practices of Lenbeth Group of Companies are designed to promote the development and maintenance of the highest possible levels of worker health and safety in an efficient and productive workplace.

POLICY APPLICATION

One of the tools used in this Program is drug testing. The Company recognizes that drug testing does not necessarily demonstrate impairment, nor does it necessarily reveal a substance abuse problem or chemical dependency. A verified positive drug test only means that a drug or alcohol is in the donor's system without medical authorization.



The Company realizes that substance dependency is considered to be a disability under the Human Rights Code and intends to comply with the requirements of the Code and any other applicable laws in the implementation of this Program.

Unless otherwise stated, drug testing will only be required of those employees who work in Safety Sensitive Positions.

DEFINITIONS

The following words and phrases, when used in this document, have the meaning noted below each:

Alcohol

Means an intoxicating liquid which is designed and manufactured for human consumption, and which meets the scientific definition of alcohol.

Company business

Refers, without limitations, to all activities undertaken by employees and by contractors and their employees in the course of the Company's operations, whether conducted on or off Company property.

Company driver

Includes those employees and contractor employees whose duties involve driving a vehicle (as defined under "Company property" below).

Company property

Means any land, building, work or part thereof owned, leased or occupied by the Company and any motor vehicle, piece of equipment, container or other means of transportation (collectively, "vehicle"), owned, leased, rented or used by the Company and any private vehicle used in the course of Company business.

Contact Group

Means those named individuals, as published by the Company from time to time, whose responsibilities include receiving and responding on a confidential basis to information generated by the Program.

Drug

For the purposes of the Program, a drug is any substance, including without limit, alcohol, cannabis, illegal drugs and prescribed medications, the use of which has the potential to change or adversely affect a person's physiological and/or psychological state. Drugs of concern are those that potentially inhibit a person's ability to perform his/her job safely and productively. Specific drugs of concern include, but are not limited to, alcohol, marijuana, cocaine, opiates, phencyclidine and amphetamines.

Employee

Means any person employed by the Company or by a contractor working on Company property, whether in a full or part-time position, and includes office and managerial staff. In the case of employees working for a contractor, reference herein to the Company shall be deemed to refer to or include the contractor as appropriate.

***Fitness for Duty***

Means a state (physical, mental and emotional) which allows the individual to perform assigned tasks competently and, in a manner, which does not compromise or threaten the safety or health of that individual or others. Final determination of what constitutes "Fit for Duty" for any specific task will lie in the sole discretion of the principal employer, manager or supervisor using the guidelines provided by this Program and, where applicable and appropriate, other available assessment procedures.

Incident

Means an event which intentionally or unintentionally causes, or could have caused (a near miss), injury or damage.

Medical Review Officer ("MRO")

Means a medical doctor who has been trained and certified in the interpretation and reporting of human drug testing for substance abuse.

On-the-job

Means any time that an individual is engaged in Company business while on Company property, whether on or off duty at the time.

Positive

A positive alcohol test means a blood alcohol concentration equal to or greater than 0.02 grams of alcohol in 100 milliliters of blood. A blood alcohol concentration which is confirmed at 0.04 grams of alcohol per 100 milliliters of blood will be considered a violation of the Program. A positive drug test means that the qualitative levels in the body of a drug (excluding alcohol) are over the approved cut-off levels as set out by the U.S. and Canadian Federal Governments and monitored by the Substance Abuse and Mental Health Services Administration, HHS laboratories.

Qualified Program Administrator

The Company will use the assistance of a qualified external party to administer this Program, both to ensure confidentiality and secure arm's length administration of the Program.

Reasonable Cause

Includes direct observation of drug possession or use, irrational or unusual behavior, and reporting to work in an apparent, unfit condition (based on specific, contemporaneous, clear observations concerning the individual's appearance, behavior, speech or body odors) which would reasonably lead one to believe that the individual may be under the influence of a drug.

Safety Sensitive Position

A Safety Sensitive Position is one in which a state of incapacity due to drug impairment could result in direct and significant risk of injury to the incapacitated individual, others, Company property and/or the environment. These positions depend on alertness, quickness of response, soundness of judgment, and accuracy of coordination of multiple muscle functions and have a direct role in an operation where inappropriate performance of the task could



result in harm to oneself, co-workers, invitees, property or the environment. This definition includes all individuals who are required to rotate through or within a Safety Sensitive area.

Examples of Safety Sensitive Positions include but are not limited to:

- All personnel working on a construction site;
- Safety watch for confined space entry;
- Toxic chemical haulers;
- All personnel working on a mine site;
- All heavy equipment operators and vehicle drivers; and
- Other positions identified by the Company as being of a Safety Sensitive nature.

Substance Abuse Professionals (“SAP”)

An SAP is responsible for determining whether or not an employee has a drug dependency or abuse problem and needs assistance to overcome such problems.

General Duties of Care

Each of the Company, contractors and employees covered by this Program share a legal and moral duty under applicable occupational health and safety legislation to ensure its successful implementation of the safety and well-being of all. This includes the duty to identify and report all safety issues and breaches of the Program to the Company.

Duty of Employer

An employer is required by law to provide a safe workplace and safe systems of work, which includes the elimination of known hazards in the workplace. Part of that duty of care includes taking reasonable precautions to ensure that all employees on Company property are in a fit condition to work so as to minimize risks both to themselves and others.

Duty of Senior Management

The senior management of the Company will be responsible for ensuring the adoption and implementation of this Program, including:

Company-wide implementation

Ensure that frontline managers and any contractors they may oversee, or audit understand and implement the Program in all their areas of responsibility.

Provision of resources

Ensure that adequate resources are allocated for the education, training, counselling and other requirements of the Program throughout the Company’s offices and operations.



Recognition of Impairment

Lenbeth Group of Companies will ensure that appropriate training is provided to Management and Supervisory staff to adequately recognize signs of impairment and appropriate response procedures.

Duty of Supervisory Staff

Supervisory staff will be responsible for the health, safety and welfare of all individuals under their control or supervision. Specific responsibilities include:

Implementation of the Program in area of responsibility

Supervisors are responsible for the effective implementation of the Program on their respective sites including the briefing of all employees and contractors, the provision of appropriate education and training resources and the review of the Program's application and effectiveness in their areas of responsibility.

Adherence to the Program

Supervisors are responsible for ensuring that all individuals in their area of responsibility understand and comply with the requirements of this Program.

Application of the Program

Supervisors are responsible for ensuring that the Program is applied fairly and consistently and that all individuals are treated with respect. In particular, they will ensure that no employee who seeks assistance will be disadvantaged and that all employment rights are safeguarded.

Assessing Fitness for Duty

Where appropriate and practical, supervisors are responsible for assessing the Fitness for Duty of individuals under their control at the start of and throughout each work period.

Action required when an individual is not Fit for Duty

Supervisors are responsible for taking prompt and appropriate action whenever they have reasonable cause to believe that an individual is not capable of working in a safe and effective manner. The exercise of this responsibility may include:

Immediately, and as unobtrusively as possible, removing the individual from the workplace;

Documenting all occasions when an employee has been determined to be not Fit for Duty or when performance is unsatisfactory, and all steps taken by staff to correct the situation including providing effective feedback to the employee concerning his/her performance or safety;

Assisting the employee to access support and assistance from local providers or through the Company Employee Assistance Program.



Ensuring confidentiality

Communication of confidential information is on a “need to know” basis only. In general, supervisors will only be provided with functional ability information in respect of their direct report. However, if supervisors are in a position where they have knowledge of or are required to receive sensitive medical or other personal information about an individual of a confidential nature, then they are responsible for establishing and maintaining appropriate procedures and facilities to safeguard such information against unauthorized use or disclosure. Compliance with the Company’s Privacy Policy and with applicable privacy legislation is required.

Duty of Employees

Each employee on Company property (whether under the employ of the Company or a contractor) has a duty to take reasonable care so as not to expose him or herself or others to unnecessary health or safety risks. An important part of this duty is ensuring that he/she is in a fit state to work at the start of, and throughout each work period.

In order to fulfill this responsibility, each employee has the obligation to:

Report to work in a fit condition

All employees must present themselves at work in a condition in which they are able to carry out their duties without risk to themselves or others. This includes ensuring that they are not in an unfit state due to the adverse effects of fatigue, stress, alcohol, cannabis or drugs.

Notify the employer of any actual or potential impairment of Fitness for Duty

The Company recognizes that there are many legitimate medical causes or other reasons for physical or mental impairment of an individual's Fitness for Duty. In such circumstances, employees should notify their manager or supervisor of any concerns about, or potential impairment of, their fitness for work. The employee may be required to have his/her treating medical care professional discuss his/her circumstances with the Company medical provider before they are permitted to return to work.

Reporting to work for an emergency or call-out (Duty of All)

Workers that are contacted to report for work for emergency or other unscheduled reasons must not accept a work assignment if they have reason to believe their ability to work safely and effectively may be impaired by reason of the use of drugs. Any worker contacted to report in such circumstances has a duty to refuse the assignment and advise the person contacting them that they are doing so because they believe they may be impaired. Workers refusing a work assignment on this basis will not be subject to discipline for the refusal, although they may, depending on the circumstances, be referred to a counselling program following numerous refusals to work because of impairment.



Notification of breaches of the Program

All individuals must notify their managers, supervisors or occupational health and safety representatives of any situation in which this Program may have been breached. This includes:

- **Any situation in which other individuals appear to be unfit for work;**
- **The unauthorized possession or consumption of alcohol, cannabis or drugs on Company property or during the work period by another individual;**
- **The manufacture, transportation, sale or purchase of drugs while on Company business or Company property;**
- **Any other apparent breach of the Program.**

All information reported will be dealt with in the strictest confidence save and except where disclosure is required for the immediate protection of the health and safety of the individual in question or others in the vicinity, is mandated by law or is required in order to fully and properly investigate the incident reported.

SECTION II. TESTING APPLICATIONS

Pre-employment Testing

The Company will require that applicants for Safety Sensitive Positions undergo a drug test after being given a conditional offer of employment with the Company. In the event of a positive test result, the steps set out in Section V.C. of this Program will apply.

Reasonable Cause Testing

When the Company has reasonable cause to believe that an employee has violated the intent or substance of this Program and is unable to work in a safe manner, and/or if there are clear observations concerning the appearance, behavior, speech or body odors of the employee which would reasonably lead one to believe that the employee may be under the influence of a drug, the Company will advise the individual accordingly and request that he/she submit to testing for drugs. To ensure the safety of the individual and others working in the vicinity, a Company representative (and in the case of a contractor's employee, a representative of the contractor) will transport the individual as soon as practical to the specimen collection site or, if time and circumstance permit, will arrange for the collection agency to attend on Company property. The individual will then be asked to submit to a drug test.

An employee who is asked to take a Reasonable Cause Test will be considered unfit for work and will be placed on immediate suspension pending the results of his or her test. Should the test results be negative, the employee will be paid for the period of such suspension.



Post Incident Testing

Incidents will be investigated by the Company. Post Incident Testing for Drugs will not be required unless it has been determined that an individual's actions did or could have contributed to the incident and the incident in question involved:

- A death

The need for medical treatment resulting from a serious injury that:

- Places life in jeopardy
- Produces unconsciousness
- Results in substantial loss of blood
- Results in the fracture of a leg, arm, finger or toe
- Results in the amputation of leg, arm, hand, foot, finger or toe
- Consists of burns to a major portion of the body, or
- Causes the loss of sight in an eye

Damage to public or private property which is believed to exceed \$5,000.00 including the cost of clean-up and recovery, value of lost product, and/or damage to the property of others; or

- Results in an emergency shutdown of a facility or part thereof.

Every employee will be subject to Post Incident Testing for Drugs in accordance with the preceding criteria. Testing may also be required for near misses if they are considered to have had significant potential for more serious consequences as outlined above. Because Post Incident Testing is an investigative procedure, testing is required even in the absence of direct evidence or suspicion of drug use.

Reasonable Cause and Post Incident Testing will be conducted as soon as reasonably practical following the incident. No testing for alcohol shall occur more than 8 hours after the time of the incident, giving rise to the test. It is recognized that it may not be possible to test an individual after an incident which renders him or her incapable of giving informed consent.

Return to Duty Testing

The Company will require an employee who is qualified to return to work after a violation of this policy or who has completed a treatment program for substance abuse and satisfied the recommendations of a Substance Abuse Professional to undergo a Return to Duty Test for Drugs. A negative test result is required before the individual will be allowed to return to duty.

Client Requested Testing / Pre-Site Access Testing

From time to time, it may be necessary for the Company to meet a client or customer's drug testing requirements (which may differ from those outlined in this Program) in order to qualify for work on their projects or to access their worksites. Prior to agreeing to do so, the Company will seek legal input



regarding the propriety of such requirements and the adequacy of privacy protections according Company employees who will be assigned to the project or site.

SECTION III. REFUSALS AND PROHIBITIONS

Refusal to be Tested and other Breaches of the Program

Compliance with the Program, including acceptance of drug testing, is a condition of continued employment with the Company. Refusal to be tested will be viewed as a failure to comply with Company policy and a breach of the Program. Such a refusal will result in the employee being referred to a SAP for assessment and, depending on the facts of each case (including the nature of the breach, the existence of prior violations, the seriousness of the breach, and the employee's own efforts to correct the situation), could lead to a treatment recommendation, a requirement to attend educational sessions, or to a variety of progressive disciplinary measures by the Company up to and including termination of employment for cause.

Examples of refusal include:

- Failing to provide adequate breath for an alcohol test without a valid medical explanation;
- Failing to submit to a test when requested to do so; or
- Engaging in any conduct which obstructs the testing process.
- Examples of prohibited conduct under the Program include: (see Section III.C. for details)
- Manufacturing, distributing, possessing, using, selling, transferring, purchasing or transporting illegal or prohibited drugs while on the job or on Company property;
- Reporting to work in an apparent unfit condition due to the effects of drugs;
- Using alcohol before the expiry of an 8-hour abstention period following involvement in an incident or before undergoing a Post Incident Test for Drugs or released by a supervisor;
- Performing or continuing to perform Safety Sensitive functions, including driving Company owned vehicles while being under the influence of drugs or alcohol.
- Specimen Adulteration

Any employee found to have tampered with or to have attempted to alter a specimen collected for the purpose of drug testing will be required to be evaluated by a SAP. Violations under this section will subject the employee to progressive disciplinary action up to and including dismissal for cause. If an employee is permitted to return to work following evaluation by a SAP, he or she will be required to comply with all recommendations of the SAP, attend further educational sessions where appropriate and commit to future compliance with the Program.



Inability to provide an Adequate Sample

In the event that an individual is unable to provide a suitable sample of breath for breath alcohol testing or urine for drug testing, the individual will be required to submit to a medical exam within 5 days or show the employer documentation of an appointment to be evaluated. The evaluation is to be performed by a licensed medical physician acceptable by the MRO to determine whether a valid medical condition exists for such inability. If the physician determines that a valid medical condition does exist, the test result will be reported to the Company as “canceled”. If the physician determines that a valid medical condition does not exist, or the individual fails to obtain such evaluation within the above timeframe, the test result will be reported to the Company as a “refusal”.

Prohibited Conduct

The manufacture, distribution, possession, use, sale, transfer, purchase or transport of illegal drugs while on the job poses unacceptable risks for safe, healthful and efficient operations and will be considered a violation of this policy. Violations under this section will subject the employee to progressive disciplinary action up to and including dismissal.

Reporting to work in an apparent unfit condition and conduct of a similar nature due to the effects of drugs, is prohibited.

No employee required to take a Post Incident Alcohol Test shall use alcohol for 8 hours following the incident or until he/she undergoes a Post Incident Alcohol Test, whichever occurs first.

No employee who is found to have an alcohol concentration of 0.02 or greater but less than 0.04 mgs shall perform or continue to perform Safety Sensitive functions for the Company, including driving a Company-owned motor vehicle (including mobile equipment), until the start of the employee’s next regularly scheduled duty period, but not less than 8 hours following administration of the test.

Using, being under the influence of, or possessing alcohol or cannabis while on the job is prohibited.

It is the responsibility of every individual when on Company property, to ensure that all prescription and legal non-prescription medications are safely stored, taken only as prescribed or indicated on the package, and are unlikely to adversely affect his/her performance or Fitness for Duty. This requires individuals to discuss with the prescribing medical practitioner the nature of his/her duties and to ascertain any possible side effects of the prescribed medication which may impact his/her safety or performance at work. No employee will carry out his or her duties while his/her performance may be affected by prescription or over the counter medications. If an employee has any questions or concerns about his or her ability to safely or efficiently perform

the job while taking medication, that employee has an obligation to report the questions or concerns to his or her supervisor.



Employees who are on Company business or on Company property must comply with all local, provincial and federal laws.

SECTION IV. TESTING METHODOLOGY

Scope

Workers can only be tested immediately before, during or immediately after duty. This includes being immediately available for duty.

All drug testing will be conducted by urinalyses. All testing will be collected, analyzed and interpreted by certified professionals. Where breath alcohol or saliva testing devices are available, alcohol may be tested using breath or saliva samples by a qualified Breath Alcohol Technician.

Results of these tests will be treated with a high degree of confidentiality.

All urine samples will be collected and then split into two separate sealed containers (split sample collection method) for the protection of the individual being tested. Should the individual dispute the initial test results, he/she has the right to submit a written request (within 72 hours of the initial interview with the MRO) to the MRO to have his/her split sample tested by an independent accredited laboratory. The split sample testing will be at the employee's expense if the independent laboratory confirms the presence of the drug which was reported by the first laboratory.

Drug Testing Procedures

Administration – Recognizing the need to protect the confidentiality of sensitive medical information, to limit the possible adverse reputational impacts of a request for drug testing and to ensure fair and equal application of the Program, the Company has appointed a professionally recognized and centralized body for administering the Program (hereafter, the Qualified Program Administrator).

Administrator – The Qualified Program Administrator is responsible for liaising with and coordinating the work of the collection sites, the laboratory and the MRO; and is also charged with communicating the details of the Program and its implementation to the Contact Group and advising on educational courses that would foster a better understanding of the impact of drugs on the individual and worksite.

Methodology – The drug testing methodology for the Program consists of four steps:

Collection of the specimen

Laboratory processing iii)

A review by the MRO

iv) Communicating the results



Collection – When capable, all specimens will be collected in accordance with approved protocols of the U.S. Substance Abuse and Mental Health Services Administration (SAMHSA) as adopted by the Standards Council of Canada. Unless otherwise provided, individuals to be tested are required to report to the appropriate collection facility for collection of the specimen.

Urine specimen collection will be done in a private setting without observation by the collector. However, where there is reason to believe that the individual being tested may have altered or substituted a specimen, witnessed collections may be conducted.

Collection facilities will send the specimen directly to the certified contracted laboratory which will, in turn, analyze the specimen.

Laboratory – The laboratories currently contracted to process all Company specimens are SAMHSA accredited/certified laboratories. They will process all specimens in accordance with applicable SAMHSA guidelines and screening cut-off concentrations. All positive drug test results will be confirmed by Gas Chromatography Mass Spectrometry. The results of all specimens processed are then sent to the MRO for final verification.

MRO – The MRO appointed by the Qualified Program Administrator will review the files of all employees who receive positive results from the laboratory to determine whether there appears to be any explanation for the positive result other than substance abuse. The individual tested may request an opportunity at this time to submit additional medical information for consideration by the MRO. A confidential physician/patient relationship will be deemed to exist between the MRO and any individual who elects to deliver additional medical information.

Communicating the Results – If the MRO receives results from a drug test indicating that it was “positive”, he/she will do the following:

Contact the employee who was tested to verify if there is any valid medical reason for use of the drug in question.

If no valid reason exists, the MRO will communicate a verified positive result to the Company.

If the employee has a valid medical reason for using the drug, the MRO will report a verified negative result to the Company.

If the MRO receives a positive result but is unable to contact the employee who provided the specimen within 24 hours from receipt of the results, the MRO will ask the Company to arrange for the individual to contact the MRO. The Company (or, if the employee’s employer is a contractor, the employer) will contact the employee at his/her last known telephone number and advise that the employee has 3 business days in which to contact the MRO, failing which a positive result will be reported to the Company.

The MRO may verify a test result as positive without having communicated directly with the individual tested in three circumstances:

The individual expressly declines the opportunity to discuss the test;



After making all the reasonable efforts, neither the Company (contractor) nor the MRO has been able to contact the individual within the timelines outlined in ii) above;

The individual was successfully contacted by the Company or employer (as documented in writing) and instructed to contact the MRO within 3 business days but failed, without reasonable excuse (including a serious illness or injury or other circumstance that made timely contact impossible), to do so.

If the MRO is advised of circumstances that made timely contact by the individual impossible, the MRO may reopen the verification and allow the employee to present additional medical information regarding the positive test.

Iv) Following completion of the review process, the MRO will report the test results to the Company in a manner that ensures confidentiality of the information.

Protection of Privacy – All records concerning drug tests maintained by the Company will be kept in a separate confidential filing system segregated from any other Company records including employee personnel files. All test results will be marked “Confidential / Restricted Access”, with only Contact Group members having access. The information will be safeguarded against unauthorized use or disclosure in accordance with the Company’s Privacy Policy and applicable Privacy legislation; and will only be used or disclosed to third parties without the individual’s consent in cases where such information is needed to ensure the safety or health of the individual or others and the individual cannot be timely located, disclosure is required by law, or the proposed use or disclosure is otherwise exempt from the requirement of consent under applicable Privacy legislation.

SECTION V. ACTION ON TEST RESULTS

General

All positive drug results obtained by a screening test will be confirmed by Gas Chromatography Mass Spectrometry. A positive test result will lead to a SAP evaluation to determine whether a problem of substance abuse or dependency exists or not. If, after evaluation, it is determined that the employee requires treatment before returning to work, the Company will require successful completion of the treatment program as a requirement for returning to work. After successful completion of a treatment program, the employee will be subject to all the regular provisions of this Program, as well as periodic unannounced follow-up testing.

Breath Alcohol Confirmation Test Procedures

In the case of testing alcohol with a breathalyzer, if the result of the initial screening test is 20 mg of alcohol per 100 milliliters of blood or greater, a confirmation test will be performed. The confirmation test will be conducted not less than 15 minutes after the completion of the screening test. The reason for this requirement is to eliminate mouth alcohol residue leading



to an artificially high reading. The result of the confirmation test will be reported. Confirmation tests may also be done at the laboratory through urinalysis.

Applicants for Employment

If an applicant tests positive and can establish that he/she suffers from a substance related disability, he/she will be informed that the conditional offer of employment will be honored by the Company provided he/she submits to the requirements of this Program. If the applicant agrees, he/she will be required to sign Conditions of Continued Employment (CCE – an agreement which allows the Company to accommodate the individual knowing that he/she is not refusing treatment where required.) and will be contacted for an interview by an SAP. This interview will determine whether the applicant requires assistance in resolving problems with substance misuse. If, after the evaluation by the SAP, the Company is advised that the applicant needs assistance, the applicant will be required to complete the education, assistance or treatment program recommended by the SAP prior to attending at the worksite.

In cases where the applicant tests positive, but is advised by the Qualified Program Administrator following a SAP interview with the applicant that the applicant does not need any such assistance and is not suffering from a disability, the Company will review its conditional offer of employment and determine on the individual circumstances of each case whether the conditions for employment have been met or not.

Current Employees

As previously noted, the Company recognizes that a verified positive drug test does not prove impairment at the time of the test or a chemical dependency or addiction. But it is also widely accepted that drug use generally does lead to impairment of an individual's perception, motor skills, reaction time and clarity of thought. In order to reduce the risk from the use of drugs in the workplace, the Company has established a process to be used after a verified positive result. The steps outlined below are designed to help employees who may require support (through either voluntary self-declaration of drug use or delivery of a positive drug result after testing) to find it.

First – the employee signs a Conditions of Continued Employment form, which also allows for the release of information obtained on evaluation by the SAP to the Company.

Second – after the CCE is signed, witnessed and faxed to the Qualified Program Administrator, arrangements will be made for the employee to be evaluated by a SAP. This evaluation is a brief

psychological screening that helps identify individuals who have a high probability of having a substance dependence disorder (chemical dependency), followed by a face-to-face interview with the SAP to determine if the employee needs assistance in overcoming a drug problem.

Third – after successful completion of the SAP evaluation and the recommended rehabilitation program (if any is required), the employee will be allowed to return to work or to a comparable position if Company or individual circumstances warrant a change of duties, shift or location. The employee will remain subject to all provisions of this Program.



Both an affirmative SAP report and a negative Return to Duty Drug Test (with periodic follow-up drug testing as required by the SAP recommendations) will be required for return to work.

If an employee in a Safety Sensitive Position refuses to participate in a recommended education, rehabilitation or treatment program or to sign the required CCE document, or fails, without good reason, to attend the Return to Duty Drug/Follow-up Test or complete the recommended education, rehabilitation or treatment program, he or she will not be considered for further employment.

Employees who are off work as a result of this Program may be entitled to use any applicable Company leave benefit or sick time that may be available.

Self-declaration and Rehabilitation

Employees are encouraged to seek assistance from the Company before drug problems lead to performance problems. The employee's decision to self-declare and seek assistance from the Company will not become part of his/her personnel file, will not be used as basis for disciplinary action, and will not be used against the employee in any disciplinary proceedings. However, should the employee who self-declares and receives assistance from the Company subsequently breach the terms of this Program, the fact that the employee voluntarily declared a drug problem and sought assistance will not be a defense to imposition of disciplinary action for the subsequent violation.

Employees who decide to self-declare and voluntarily participate in a treatment program may be granted leave to do so with the conditional right to return to work dependent upon the employee's successful completion of the appropriate treatment regime as determined by a Substance Abuse Professional.

Storage of Results

All drug testing results will be sent to the Contact Group for filing and safeguarding of confidentiality. The Contact Group will include those individuals named and published periodically by the Company.

SECTION VI. RESPONSIBILITIES

Independent Contractors

- All independent contractors (which term includes anyone who operates on or works with any Company property under contract to the Company) will be expected to:
- Work with the Company to ensure the successful implementation of the Program in respect of all services and work being performed by the independent contractor and its employees;
- Perform all contracted work and services in a safe manner consistent with established Company practices, standards, policies and this Program;



- Read, understand and agree to abide by this Program by signing in the space provided on the last page and implementing all duties and responsibilities accorded to an employer hereunder;
- Where required by law or necessity or the Company, implement a similar program for all your employees when they are traveling to or from and when they are on Company property;
- Ensure that all your employees are aware of and agree to submit to testing for drugs as set out in this Program or a comparable program implemented by you;
- Ensure that all your employees attend for any and all scheduled and unscheduled work Fit for Duty;
- Encourage all your employees to self-declare, seek advice and follow appropriate treatment programs if they believe they have a substance dependency or emerging drug problem;
- Ensure that all your employees abstain from the manufacture, transportation, possession or use of drugs while traveling to or from and when on Company property;
- Cooperate with the recommendations of any health care professional;
- Perform any recommended monitoring or aftercare following primary treatment of an employee for a drug problem;
- Assess the potential for impairment during working hours that could be caused by the legitimate use of medication and manage the risk;
- Report the use of any medication that could have a negative effect on employee performance to the Company's medical services provider;
- Observe the Fitness for Duty of others on Company property and take appropriate action if safety issues are a concern.

Violation of or failure to perform any of the preceding requirements may result in the termination of the agreed services.

Hosting Procedures

In the case of Company-related social activities whether on Company premises or off, appropriate regard must be taken for safety and wellbeing of the individuals present and the community. Social events will not be held on Company property. Company social events, which involve consumption of alcohol and are organized by Company representatives off of Company property, must keep in mind the following:

Employees attending as guests and are not to be performing work functions.

Social events will be held in establishments which have their own liquor license and their own servers. The Company will not supply servers.

The Company representative responsible for organizing the event will notify the bar staff that those persons who appear to be impaired are to be "cut off".

The Company will, under no circumstances, supply free drinks.



The announcement of “last call” will not be issued and the bar will be closed before the end of the function.

In situations where impairment is suspected, alternative transportation will be made available.

SECTION VII. ACCOMMODATION

Employees’ Responsibility

A person who requires accommodation in order to perform the essential duties of a job has a responsibility to communicate the need for accommodation to the Company in sufficient detail to indicate the type and duration of accommodation required and to cooperate in the Company’s efforts to respond to the request.

Support

If an employee’s drug addiction or dependency interferes with that person’s ability to perform the essential duties of the job, the Company will provide the support necessary to enable that person to undertake a rehabilitation program unless it can be shown that such accommodation is not possible without causing the Company undue hardship.

Consequences

The purpose of this Program is twofold:

- To help those individuals with substance abuse problems and aid in their rehabilitation; and
- To ensure that employees impaired by drugs, or the stress and fatigue, do not harm themselves or place the health and safety of others at risk by attending on Company property or Company business in a condition unfit for work.

Where safety is an issue, employees will be removed from their Safety Sensitive duties. Unless otherwise specified, all employees who violate the Program will be required to see a SAP for evaluation. Multiple violations of this Program will result in progressive disciplinary action up to and including dismissal.

This program is intended to provide a tool for ensuring that every employee has a safe, healthy and productive environment in which to work, while preserving dignity and providing needed assistance to those who are troubled by substance abuse. The success of the Program is everyone’s responsibility. The benefit of a successful Program is everyone’s gain.

Appendix – Employee Acknowledgement
Appendix - Contractor Acknowledgement



AGREEMENT AND ACKNOWLEDGEMENT

I acknowledge receipt of a copy of the safety manual, receiving the appropriate training or demonstrating the appropriate competency, and having read and understood the materials appropriate to my role and responsibilities within Lenbeth Group of Companies.

I accept the safety policy, procedures, standards and guidelines set forth by Lenbeth. and understand the necessity to abide by them at all times and agree to comply with the Occupational Health and Safety Act (Alberta), the Code and Regulations.

I accept Supervisors and Managers are the onsite authorities regarding safety concerns that arise during the course of our work scope.

Signed copies are kept on as a record of agreement in the Worker's Human Resources file.

I agree and acknowledge the proceeding by duly signing this agreement effective.

this _____ day of _____, 20____.

Name _____

Company _____

Signature_____

APPENDICES

Appendix: Work Refusal Record Form
Appendix: Worker Orientation Record -Training Matrix
Appendix: Inventory and Inspection Checklist
Appendix: Jobsite Inspection Form
Appendix: Hazard Assessment and Control Report
Appendices:
Safe Job Procedures
Safe Work Practices
Appendix: Emergency Phone Numbers
Appendix: Incident Investigation Report
Appendix – WCB Employer’s Report of Injury/Disease
Appendix - WCB Worker Report of Injury/Disease
Appendix: Incident Investigation Report
Appendix: Witness Statement
Appendix – Emergency Drill Evaluation
Appendix – Emergency Response Map (Office)
Appendix – Employee Acknowledgement
Appendix - Contractor Acknowledgement
Appendix - Spill Procedure
Appendix - Spill Report
Appendix - Contractor Health and Safety Agreement