

CORPORATE POLICY

Northwestern Roofing Ltd. are committed to working pro-actively with all personnel to develop and implement a quality safety program ensuring that workers are provided their Right to a safe and healthy work environment.

Our program will be reviewed annually and from time to time as required to ensure that all policies, procedures and practices are up to date with the most current trends, legislation and applicable standards.

Management will maintain the responsibility of providing a safe work environment through training, communication and hazard recognition; and will be accountable for the Rights of all workers.

Foremen/Supervisors; Accountable for implementation and enforcement of the program through communication, training and hazard recognition. Ensuring workers concerns and suggestions are documented and shared with management and safety representatives.

Workers; Responsible for communicating concerns, unsafe conditions and proactive suggestions; know the fundamental Rights (know-participate-refuse) and accountable for making sure safety is never sacrificed for expediency.

Sub Contractors: Are to inform of any unsafe conditions and acts to the site supervisor through documentation; forward all relevant safety information such as tool box minutes and inspection reports where required; provide safe working conditions for all workers on site; and cooperate with the policies and procedures as set by the current legislation and this program.

Suppliers: When on site cooperate with the policies and procedures set forth along with current legislations; provide

competent training and proof of training for products supplied (this includes rental of equipment and tools); ensure that current MSDS are provided where needed.

Safety is a condition of employment that will be observed by all and play an integral part in job planning and execution. **Northwestern Roofing Ltd.** asks that all employees, sub trades and suppliers work together to ensure a successful safe work environment.

EMERGENCY PLANNING AND PROCEDURE POLICY

Having a policy to outline the responsibilities and procedures to follow in case of an emergency is important because no matter how careful we are; there is always a risk of an emergency.

Northwestern Roofing Ltd. will make sure that the resources to deal with emergency situations at the workplace are implemented and maintained.

Adequate first aid supplies will constantly be available. A first aid log is to be completed when using any item from the first aid supplies this allows for assistance in determining trends. Once a month an inventory must be taken of the first aid supplies and submitted into the office. These will be kept on file for future reference.

Transportation and outside communication systems will be placed and an Emergency Contacts form will be completed for every job site and posted for all workers to see.

Fire extinguishers will be adequately available and will be mandatory at all hot work sites. Fire extinguishers that have been discharged must be returned to the office accompanying an Initial Investigation Report for recharging and records of such are to be kept on file. Fire extinguishers

will be part of the Inspection Program and will be inspected and maintained on an annual basis.

Northwestern Roofing Ltd. will ensure that there is adequate number of personnel trained and capable in first aid and fire extinguisher use at each project location in accordance with the current legislation.

This policy and site specific emergency preparedness plans are to be reviewed with all workers entering the job site and be advised of his/her role and responsibility in such plans. This review is to be documented and submitted into the office for files.

Emergency response plans are to be tested for deficiencies from time to time and corrective action is to be taken, followed by a review of revisions with all workers. Conducting periodic tests of emergency plans will ensure that they are followed properly in the event it is to be executed in a real situation.

Any emergency situations (near misses) shall undergo initial investigation by the foreman and site safety representative; the safety investigation team will investigate severe situations.

First aid Guidelines

Northwestern Roofing Ltd. is responsible to ensure the prompt and efficient administration of first aid to an injured worker. We will provide supplies, equipment, and personnel as appropriate.

At a minimum, we will provide and maintain:

- 1) A regulation first aid kit; first aid handbook; and first aid kit log sheet.

- 2) First aid personnel as required by Regulation/
- 3) Transportation to a medical facility
- 4) A communication device to summon emergency services

Fire Protection Guidelines

It is far easier and safer to prevent fires than to fight them. All personnel will contribute to fire prevention by practicing good housekeeping and limiting the amount of combustible material only to the amount necessary to do their work. All access combustible material will be safely stored where it does not pose a risk.

A sufficient number of fire extinguishers will be present on each jobsite and will be stored easily accessible locations. During any "hot work" a fire extinguisher must be immediately available.

Should a fire extinguisher be used, found to be in need of repair, or recertification, workers will ensure that lock out/tag out procedures are followed and a supervisor or safety representative advised immediately.

In event of a fire, workers are to assess whether it can be safely extinguished.

The **[P.A.S.S.]** system is to be followed when using a fire extinguisher:

PULL - Pull the pin from the handle of the extinguisher

AIM - Aim the extinguisher at the base of the fire [within 10 feet or less]

SQUEEZE - Squeeze the handle of the extinguisher

SWEEP - Sweep the extinguisher back and forth covering the full base of the fire.

DO NOT ATTEMPT TO EXTINGUISH A FIRE THAT IS ALREADY TOO INVOLVED. IN THAT CASE,

ENACT EMERGENCY EVACUATION PROCEDURES AND SUMMON THE FIRE DEPARTMENT IMMEDIATELY.

GENERAL RULES

Accidents, injuries or "near misses", regardless of their nature (damage or injury) will be immediately reported to supervisors. If first aid is required it must be taken care of promptly.

All PPE is to be worn at all times on all job sites as outlined on the hazard assessments completed and all applicable safe work procedures and practices.

Only those tools that are in good repair, with all guards and safety devices in place, shall be used.

All tools shall not be used for any purpose other than that intended. All damaged or worn parts shall be promptly repaired or replaced.

Every worker shall keep his/her work area neat, clean and orderly.

Smoking is not permitted on any jobsites or company property unless it is an area that has been designated by the safety coordinator.

Only authorized, qualified personnel with appropriate PPE and in authorized areas shall carry out welding and burning operations. All compressed gas cylinders will be secured in an upright position.

Possession or use on the job of intoxicating beverages or unauthorized drugs is strictly forbidden and constitutes grounds for immediate dismissal. All prescription medication to be reported.

Employees should report any equipment or condition considered to be unsafe, as well as what they consider to be unsafe work practices. This type of information should be reported to the supervisor or safety coordinator.

When in doubt about the safety of a situation or task, contact the supervisor or safety coordinator to find the proper procedure or work practice.

Operate all vehicles and mobile equipment in accordance with site rules and highway regulations.

The following is a guideline only under which non-compliance of any rule, policy or procedure within the company safety program may be dealt with. **Termination may occur immediately depending on the severity of the offence.**

First Offence: **Verbal** (documented for records only)

Second Offence: **Written**

Third Offence: **Written, sent home without pay.**

Fourth Offence: **Termination, clearly shows disregard for safety**

Harassment Prevention Policy

All employees of **Northwestern Roofing Ltd.** are entitled to a work in an environment free of harassment. **Northwestern Roofing Ltd.** will take all reasonable measures to ensure that no employee is exposed to harassment during their employment by enforcing a "zero tolerance" policy. Violators of the policy will be subject to disciplinary action in accordance with **Northwestern Roofing Ltd.** developed procedures, or at the discretion of Senior Management.

Workplace Safety & Health Legislation defines "Harassment" as: any objectionable conduct, comment

or display by a person that is directed at a worker in a workplace or is made on the basis or race, creed, religion, colour, sex, sexual orientation, gender determined characteristics, political belief, political association, political activity, marital status, family status, source of income, disability, size or weight, age, nationality, ancestry or place of origin and which creates a risk to the health of a worker.

All employees must report harassment complaints to their immediate supervisor upon occurrence. The Supervisor in conjunction with Senior Management and the Safety Committee/Worker Representative will investigate each complaint while maintaining confidentiality. The details of the complaint investigation will be documented, interviews may be conducted and the complainant and the alleged harasser will be informed of the results of the investigation. Details of the investigation may only be disclosed if particulars are necessary to proceed with the investigation of the complaint, take corrective action, or are required by law. Employees have the right to file a complaint with the Manitoba Human Rights Commission.

Northwestern Roofing Ltd. will endeavour to work in a spirit of consultation and cooperation with all employees to achieve a respectful work environment for all employees.

HAZARD ASSESSMENT POLICY

Conducting hazard assessments allows for the identification of what actual and potential hazards exist and is an essential part of any safety program.

The control of hazards is prominent throughout the safety program and must be adhered to. As an on-going process of assessing the hazards associated with each project and/or task each inspection form will contain a hazard rating to identify what hazards are present in the workplace. Pre-job hazard assessments will be mandatory for all project start-ups. Critical task hazard assessments are mandatory for all critical tasks listed and will be reviewed prior to task and if necessary modified to suit site-specific requirements.

Critical Tasks

Confined space work

Working Alone

Working with live systems

Lifts requiring a crane system

Hazard control will be conducted through five (5) separate approaches:

Elimination: Removing or eliminating the hazard is obviously the best method of control; however not all hazards can be totally eliminated and other approaches may need to be taken.

Substitution: Substituting an unsafe condition for a safer one has proven to be the most effective hazard control.

Engineering Controls: Engineering controls consist of redesigning an unsafe condition or installing equipment or barriers to protect from unsafe conditions.

Administrative Controls: The most prominent administrative control is the safety program. Since

engineering controls are not always practical or feasible, administrative controls are used.

Personal Protective Equipment: This must be the last line of defense or as back-up protection. PPE may be used to supplement the other controls but not as a substitute for them.

Combining the above control methods may be required to eliminate or sufficiently reduce the risk of hazards to an acceptable level.

Hearing Conservation Program

Regulation Summary: Part 12 of the Workplace Safety and Health Regulation 217/2006, Hearing Conservation and Noise Control, requires the employer to assess the workplace for noise exposure. If the 8-hour average noise exposure level is above 80 dBA, the employer must institute a hearing conservation program. When workers are exposed to noise levels above 80 dBA, the employer must provide training to all workers on the hazards of the level of noise they are experiencing, and provide hearing protection for workers who request it.

When a noise exposure assessment indicates a worker is exposed to noise in the workplace that exceeds 85 dBA, the employer must inform the worker and implement sound control measures to reduce the noise to 85 dBA or less.

If the employer is unable to reduce the noise to below 85dBA, the employer must implement all requirements under MB Regulation 217/2006:

1. **All** employees will be trained on the preceding information.
2. Sound monitoring will be conducted on all facets of work performed annually or when equipment or tasks change.
3. Where average noise levels are in excess of 80db, hearing protection **must** be worn.
4. Annual audiometric testing will be done on **All** employees.
5. When required training will be provided on all types of hearing protection.

For new employees, a baseline test must be conducted within the first 70 days of employment.

INSPECTION POLICY

This policy is to control losses of human and material resources by identifying and correcting unsafe acts and conditions through the development and implementation of a recognition and control program.

Inspections are an important part of the Safety Program. All projects and warehouses, including machinery, tools and equipment fall under this policy.

Through informal inspections employees can correct a problem by discussing an unsafe act or by issuing instructions to have an unsafe condition corrected. All items brought forward are to be documented by the supervisor or site safety representative. Situations that are not corrected immediately must be highlighted for follow-up with the formal inspection that is documented on a prescribed Inspection Form.

Formal inspections are planned inspections. These will be done on a monthly basis requiring the Foreman/Supervisor and the Site Safety rep to be responsible for conducting these inspections using the prescribed inspection forms.

An integral part of the inspection process will include the hazard assessment program. The conjunction of the two will ensure that unsafe conditions are assessed and controlled through the approaches described within the Hazard Assessment policy and program and reviewed through the safety committee to ensure that the Critical Tasks list stays current and Safe Work Procedures are drafted when required.

A Preventative Maintenance program will also revolve around the Inspection process. An inventory of equipment/tools in control of **Northwestern Roofing Ltd.** will be maintained outlining the manufacturer's recommendation of maintenance. Maintenance will be carried out by qualified persons and documented for our records. By executing preventative maintenance the

company can reduce the possibility of equipment/tool failure and perhaps save from the occurrence of a near miss or incident.

An audit of the safety program will be done annually to ensure the maintenance of the Safety Program.

Disciplinary action will be taken if this policy is not adhered to.

INVESTIGATION POLICY

Almost every incident is the result of a combination of causes. The primary purpose of an investigation is to identify these causes so that corrective action can be taken to prevent a recurrence of the incident, information collected will be valuable in the event that an explanation to the Workers Compensation Board or The Workplace Safety & Health Division is required.

Investigations vary in scope, depending on the severity or potential severity of the consequences of the incident.

Initial investigations will be conducted on all types of incidents including "near misses" regardless of their severity resulting or possibly resulting in personal injury, occupational illness, fire/explosion, property/equipment damage and environmental damage.

An Initial Investigation Report will be completed by the person(s) involved reviewed by the site foreman and safety representative and returned to the office no longer than 24 hours after the incident occurs. From this report it is necessary to examine briefly ideas on the

underlying factors and at this point the Safety Committee and/or Management may initiate a full investigation.

A team comprised of worker and management committee members and the Safety Coordinator will conduct formal investigations where necessary. Results to be forwarded to the appropriate government agencies.

All completed reports will be reviewed during the committee meetings and necessary copies will be distributed to management, Workplace Safety & Health and kept on file.

Disciplinary action will be taken if this policy is not adhered to.

LEGISLATION POLICY

All personnel will take every reasonable precaution to protect the safety, health and welfare of themselves and others. All work is to be conducted in accordance with the minimum standards outlined in the Workplace Safety and Health Act and Regulations.

Management, Supervisors, Worker Safety and Health Representatives and Employees will be informed of their legal duties and responsibilities and are expected to participate and apply safe work practices and/or procedures in accordance with applicable legislation.

A copy of the Workplace Safety and Health Act (**W210**) and the Construction Industry Regulation (MR189/85) will be placed in our company safety manual. A copy of

our safety manual and applicable legislation will be readily available on all job sites for ease of reference.

Hearing Conservation Program will be implemented for work areas where exposure to noise is in excess of 80 dBa.

No employee will work alone on any job site unless the employee and supervisor develop a Work Alone Procedure and a system of contact is developed and adhered to.

Lockout / Tag-Out procedure will be developed for performing any type of work on energized equipment that could inadvertently start up or cause injury to a worker.

Operator training and/or equipment certification is to be provided when cranes, forklifts, critical or sensitive equipment is used.

Any person working with or in the proximity of a controlled product will receive WHMIS training.

MAINTENANCE POLICY

All construction activity involves people working with tools and equipment thus it is vitally important to impose a maintenance program to aid in the prevention of injuries, damage and lost production. **Northwestern Roofing Ltd.** in compliance with legislation will enforce a complete maintenance program of its tools, vehicles and equipment.

Prior to use, and in conjunction with other parts of the safety program, vehicles, tools and equipment will be given pre-operating inspections and any faults are to be documented. Vehicles and equipment will also undergo monthly inspections, and maintenance will be conducted as per the operation and maintenance manuals. Management is to approve and only qualified personnel will carry out repairs. All inspection reports and service records will be recorded and kept on file.

Managers:

- Ensure that all equipment, tools and vehicles are in a safe working condition;
- Provide the necessary training to personnel conducting inspections;
- Review required repairs and initiate action;
- Ensure that only qualified personnel are carrying out repairs.

Foreman/Supervisors:

- Perform initial inspections on all tools, equipment and vehicles once received on the job site;
- Perform all necessary inspections for preventative maintenance;
- Document all inspections and ensure that required action is reported immediately;

Worker:

- Inspect all tools, equipment and vehicles prior to operation;
- Document and report any unsafe conditions immediately;
- Cooperate and assist with inspections.

Disciplinary action will be taken if this policy is not adhered to.

PERSONAL PROTECTIVE EQUIPMENT POLICY

This policy is to aid in the minimization of injuries to all employees through the use of proper personal protective equipment (hereinafter referred to as PPE).

All personnel are to wear the items of PPE as required in each department and as each job may dictate, as a last means of defence towards hazards present on the job.

General and Specialized PPE are to conform to standards referenced by the Act, Regulations and Codes including ANSI and CSA.

Specialized PPE is to be available to all workers as required. This includes items for confined space entry, lock-out, tag-out, working at heights, task specific PPE including protective clothing, gloves and respirators. Written procedures are to be developed for the proper fitting, care and use of all specialized PPE and workers are to review these procedures prior to use. In some cases an orientation may be provided prior to the use of specialized PPE.

Inspection and maintenance of basic/specialized PPE will be included within the inspection process and documented for review. Workers are to report when PPE requires replacement or repair.

In the spirit of The Workplace Safety and Health Act, consultation with the Safety Committee will be respected concerning the selection of PPE items. It is

asked that PPE provided be maintained and any concerns are to be brought forward during toolbox meetings for further review by the Safety Committee.

NO WORK IS TO PROCEED WITHOUT THE USE OF PROPER PPE

SAFE WORK PRACTICES POLICY

Northwestern Roofing Ltd. fully endorses safe work practices being implemented as a way to control hazards and doing jobs with a minimum of risk to people and property.

Safe work practices are generally the do's and don'ts on how to carry out a task or use equipment, inform the worker about the hazards that are present, and provide direction on how to safeguard against the hazards. They are general guidelines only.

A set of safe work practices outlining the proper operating and maintenance of tools and equipment shall be readily available at all times. These practices shall be written up with the cooperation of worker reps and coordinated by the Safety Coordinator.

It is vital that this information remains current and thus must be updated as required any omissions or errors are to be brought to the attention of the Safety Coordinator or Committee member.

Work practices are to be reviewed with workers on an on-going basis through toolbox talks and general review when providing instruction to a new worker.

Disciplinary action will be taken if this policy is not adhered to.

SAFE WORK PROCEDURES POLICY

Northwestern Roofing Ltd. endorse the importance of safe work procedures being developed and implemented as a way to control hazards and doing jobs with a minimum of risk to people and property.

Work procedures are written step-by-step description of how to do a job from start to finish. These are to be readily available for review by all employees. In conjunction with investigation, inspection, and audit results; a team consisting of worker reps and management shall write these procedures with assistance given by the Safety Coordinator.

Northwestern Roofing Ltd. will ensure safe work procedures are created in conjunction with the critical tasks confronted during daily work activities and when site-specific safe work procedures are called upon. These procedures will be reviewed with all workers prior to the commencement of the specified task and from time to time as a review during toolbox meetings.

It is vital that this information remains current and thus must be updated as required. Any omissions or errors are to be brought to the attention of the Safety Coordinator or Committee member.

Disciplinary action will be taken if this policy is not adhered to.

SAFETY COMMITTEE

The Company Safety Committee is comprised of no less than four and no more than 12 members comprising of no less than half representation from worker representatives. The Safety Committee convenes on a regular basis, usually four times a year and the minutes for all Safety Committee Meetings will be posted in the shop and on major construction projects.

Duties of the Committee in accordance with The WORKPLACE SAFETY AND HEALTH ACT are:

- The receipt, consideration and disposition of concerns and complaints respecting safety in the workplace;
- Participate in the identification of risks arising out of or in connection with activities in the workplace;
- Assist in the development and promotion of measures to protect the safety of persons and check on the effectiveness of such measures;
- Cooperate with the Safety Coordinator and the Workplace Safety and Health Officers.
- Assist in the development and promotion of programs for education and information concerning safety.
- Attend the meetings regularly and set a good example.

All Committee members after being appointed must undergo a training program outlining their duties and responsibilities under The Act and the company program. In assuring the understanding of the training

program a brief test will be provided followed by a Certificate of Completion. Committee members must remain for one complete year after such time a new member may be elected.

Foremen will appoint a worker representative at all job sites and inform the Safety Coordinator of who the representative is.

SAFETY RECORDS, REPORTS AND STATISTICS POLICY

Safety program management is a dynamic and constantly evolving process. Maintaining records to keep track of this process is not only required but can give a proud demonstration of the company's safety achievements.

The records and statistics component of a safety program should contain reports on file, summaries and statistics.

Reports:

All Program Reports will be kept on file (by date). Training and orientation reports will be filed in two locations, the personnel's file and a course specific file. Audit reports are to be communicated with the safety committee and an action plan for the following fiscal year is to be developed and implemented to ensure the program evolves in a positive direction.

Summaries:

Summaries of safety related reports provide an overview of the program's activities and results that will help in determining trends and setting priorities for future

safety program measures. Therefore, summaries of the company's safety performance will be prepared and analyzed and presented at safety committee meetings and to management for review.

Statistics:

Statistics is a means of measuring safety performance and allowing for comparisons over different time periods, with other departments within the company and with other similar organizations.

Injury Frequency Rate (IFR) and Incident Severity Rate (ISR) used in OSHA systems are the statistic equations used. These are calculated each month and charted to show the company's safety trend.

Disciplinary action will be taken if this policy is not adhered to.

TRAINING POLICY

The need to provide for general and specialized safety related training throughout all levels of the company is vital to the ongoing success of the company's safety program

Northwestern Roofing Ltd. stand firm in believing that all training is safety training as doing it right also means doing it safely. It is important that all policies are known and understood by each employee and each employee has the correct training for their job related activities. Documentation and record keeping are to be kept on file.

Training will include, but not be limited to the following modules:

Safety orientations:

All new employees prior to beginning work will undergo a safety orientation conducted by management, foreman or safety representative. This package will review all company policies, procedures and rules as well as site specific information and a copy of such will be provided to the employee. Both the trainer and trainee will sign results of the orientation. Those who have not been employed for 6 months or more shall undergo orientation again.

Job specific training:

Job specific training is important to keep employees up to date with current job related trends this may include, tool demonstrations, or specific job and site orientations. All training will be documented with date, location and attendance. Further job specific training will be offered as required and will follow necessary criteria with a written or verbal test to confirm the training results. PPE specific training will also be documented.

Toolbox Meetings:

This is the primary vehicle for ongoing safety awareness and exchange of safety information. These meetings are to occur each week for 15 minutes when working with a crew of 3 or more. Safety topics should include company policy and procedures as means of a review and topics that may relate to the project performed. All meetings will be documented and submitted to the Safety Committee for further review and action if required.

Violence Prevention Policy

All employees of **Northwestern Roofing Ltd.** are entitled to a work in an environment free of violence. **Northwestern Roofing Ltd.** will take all reasonable measures to ensure that no employee is exposed to the risk of violence during their employment by enforcing a "zero tolerance" policy. Violators of the policy will be subject to disciplinary action in accordance with **Northwestern Roofing Ltd.** developed procedures, or at the discretion of Senior Management.

Workplace Safety & Health Legislation defines "Violence" as: the attempted or actual exercise of physical force against a person; and any threatening statement or behavior that gives a person reasonable cause to believe that physical force will be used against the person.

Northwestern Roofing Ltd. will: identify and assess the risk of violence in the workplace in consultation with the Workplace Safety & Health Committee and ensure compliance with the Violence Prevention Policy. Workers will be made aware of the policy through their orientations and a copy will be posted prominently in the workplace. The company will not disclose the name of a complainant or the circumstances related to the complaint to any person except where disclosure is necessary in order to investigate the complaint, required in order to take corrective action in response to the complaint, or required by law.

When an employee observes an act or behavior that is perceived to be threatening in nature which poses a potential risk to their own or others safety and health, the following procedures must be followed:

Employees:

- Move to a safe location and report the incident to your Supervisor immediately

- Provide complete details of the incident
- Do not try to resolve the incident yourself or interfere with violent individuals

Supervisors/Senior Management:

- Investigate all reported complaints of violence within 24 hours by completing a company investigation report form.
- Attempt to diffuse the situation by discussion with affected parties
- Interview, if necessary, alleged violators of the company policy
- If a safe resolution is not possible, contact outside assistance such as: Workplace Safety & Health or the local Police Department
- Inform the alleged violator and complainant of the results of the investigation

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