



1.0 POLICIES

1.1 COMPANY SAFETY POLICY

Krawford Construction is committed to promoting and safeguarding the health and safety of its employees and the employees of subcontractors by providing a safe and health work environment, and by ensuring the development and maintenance of safe work practices within that environment.

Employees at every level, including management, are responsible and accountable for the company's overall safety initiatives. Complete and active participation by everyone, every day, in every job, is necessary for the safety excellence the company expects. Management supports coordination of safety among all workers on the jobsite.

Management supports participation in the program by all employees and provides proper equipment, training, and procedures. Employees are responsibility for following all procedures, working safely, and whenever possible, improving safety measures.

Our goal is to achieve an injury and incident free environment for all workers on our jobsites. This will be accomplished through the implementation of safe work practices, loss control procedures, training, and strict compliance with the Provincial and Federal Occupational Health and Safety Act, and the use of common sense.

This policy is based on information from the Alberta OH&S Act, Regulation, and Code. All employees will become familiar with the OH&S Act, Regulation, and Code.

Terry Tanasiuk, President

January 02, 2020

Date



1.2 HEALTH AND SAFETY ENFORCEMENT AND DISCIPLINE

It is everyone's responsibility to observe and promote safe work practices and a healthy workplace. All supervisors have the responsibility to see that everyone works safely, and that safe and healthy work conditions are maintained. Safety training will be provided for all employees, and safety manuals will be available. Unacceptable health and safety performance will not be tolerated.

The success of our Safety Program depends on the support and commitment of everyone.

Employees are expected to observe safety rules, use any protective equipment provided, and immediately report any hazardous conditions or injuries to their immediate supervisor. Employees will not be discriminated against or disciplined for reporting a legitimate safety concern or hazard, or for refusing unsafe work.

1.2.1 Discipline Procedures

All employees, supervision, management, and contractors of Krawford Construction are subject to the same disciplinary measures.

Upon observance of a non-compliance issue, the employee's supervisor will make the employee aware of the infraction. This will be considered a verbal warning and will be documented on the Disciplinary Form. This document will be placed in the employee's personnel file.

A written warning or reprimand will be placed in the employee's personnel file with a copy going to the employee upon notification of a serious or potentially serious safety violation, or repeated offenses of a minor safety violation. A copy of the reprimand must be attached to the Record of Non-Compliance that is to be completed upon notification of the infraction.

If an employee commits a serious safety violation or refuses to comply with Krawford Construction, client, or legislative safety requirements, the individual may be subject to suspension, termination of employment, or other such action as may be warranted by the circumstances surrounding the infraction. Any action taken here must be documented on the Record of Non-Compliance and placed in their personnel file.

If the nature of the violation warrants involvement by Workplace Health and Safety, or other governmental officials (i.e. impaired driving, serious injury, or fatality), fines and/or imprisonment may also be imposed on the individual.

NOTE: Safety violations that are immediately dangerous to the life or health of employees, contractors, clients, or the general public, may result in the immediate removal from the worksite and/or immediate termination of employment.



When determining disciplinary measures, the reason for the infraction must be considered. It may be that an offence was committed in order to adhere to another rule/procedure, or the rule was not followed because it may have put the worker at risk. In cases such as these, corrective measures should be employed rather than disciplinary action.

It is also possible that the employee was not adequately informed of his or her responsibilities, company policies, procedures, legislative requirements, etc. If an employee claims to have no knowledge they were in non-compliance, documentation including Orientations, training records, safety meetings where the employee was in attendance, etc. should be reviewed to verify that the employee was or was not actually informed of the specific rule, procedure, or legislation before determining disciplinary action.

If, in fact, the employee was not informed of his or her responsibilities, company policies, procedures, legislative requirements, etc., the employee's supervision will be responsible to ensure that the employee received the proper information and training to safely complete his/her task.

Terry Tanasiuk, President

January 02, 2020

Date



1.3 SAFETY MEETING POLICY

Krawford Construction acknowledges that it is necessary to conduct regular safety meeting with the involvement of all employees to ensure that everyone is working in as safe a manner as is possible.

- Krawford Construction will conduct safety meetings with the overall intention of creating active communication between workers, supervisors, and management to promote safety at our worksites.
- All safety meetings will be documented and kept on file for a period of three years.
- Site Superintendents will conduct a Daily Pre-Job Meeting with all workers, at which time any safety concerns and hazards general to the site will be discussed.
- Site Superintendents will hold a weekly Toolbox Meeting, where they will discuss past, future, and present work on the site, and any incidents that have occurred since the last meeting. This is an open forum discussion where workers shall bring up any safety concerns they may have.
- Management will attend safety meetings at their sites, at minimum, on a quarterly basis.
- Office based personnel will participate in a Safety on a quarterly basis.

Terry Tanasiuk, President

January 02, 2020

Date



1.4 INSPECTION POLICY

Krawford Construction believes that preventative measures are required to control and minimize losses of human and material resources. Regular inspections of land, buildings, equipment, and worksite activities are beneficial for anticipating, recognizing, evaluating, controlling, and eliminating substandard acts, conditions, or hazards.

- Krawford Construction will maintain their inspection program by continually monitoring the worksite with both formal and informal inspections.
- All formal inspections will be documented and kept on file for a period of three years.
- Management will ensure that the health and safety concerns identified in the inspections are addressed as soon as reasonably practicable.
- Inspections will be conducted at weekly intervals as outlined in Section 10 of the Krawford Construction Health and Safety Manual.
- Formal inspections will be recorded on standard forms/checklists.
- All employees will be involved in the inspection process in order to make them aware of their work environment, be involved in the health and safety process, and create ownership of the health and safety system.
- As outlined in section 10.0, quarterly formal inspection shall be conducted by project management.
- Inspection of office and low risk facilities are to be carried out on a quarterly basis or as required by changing work area conditions.

Terry Tanasiuk, President

January 02, 2020

Date



1.5 INVESTIGATION POLICY

Krawford Construction promotes the thorough investigation of all incidents that occur on our worksites. The goal of investigations is to determine what went wrong and then put a corrective action plan in place to prevent reoccurrence. Eliminating or greatly reducing the chance of reoccurrence will aid to reach our goal of an injury and incident free workplace.

- Accurate records and documentation shall be kept on investigations relative to all incidents.
- If a trend is identified, it will be addressed immediately before a serious incident occurs.
- The Incident Reporting Procedure, the Emergency Response Procedure, and the Emergency Evacuation Procedures must be reviewed periodically by employees and documented as required.
- All investigations will be followed with recommendations and the appropriate action must be taken to prevent a similar event from occurring.
- Incidents will be investigated as per Section 14 of the Krawford Construction Health and Safety Manual.
- All supervisors will be trained in workplace investigations.

Terry Tanasiuk, President

January 02, 2020

Date



1.6 PERSONAL PROTECTIVE EQUIPMENT POLICY

It is the policy of Krawford Construction to train all personnel on the use and maintenance of Personal Protective Equipment (PPE) and to have all employees and subcontractors use appropriate PPE **as per relevant legislation.**

- All PPE will be within the requirements of Occupational Health and Safety (OH&S) Legislation and applicable standards such as CSA or ANSI.
- All PPE used by Krawford Construction will be worn and maintained in accordance with the manufacturer's instructions and requirements.
- The employee using PPE will inspect PPE at time of issue and before each use.
- All PPE that is in need of service or repair will be removed from service immediately.
- Specialized PPE that has been removed from service will be tagged "**OUT OF SERVICE**". Any PPE tagged "**OUT OF SERVICE**" will not be returned to service until repaired and inspected by a person qualified to perform the repair.
- Basic PPE in need of service or repair will be destroyed and discarded.
- Appropriate inspection and service logs for specialty PPE will be maintained by the Company.
- PPE will not be modified or changed contrary to the manufacturer's instruction and specifications or OH&S regulations.

Terry Tanasiuk, President

January 02, 2020

Date



1.7 HARASSMENT/WORKPLACE VIOLENCE POLICY

Krawford Construction is committed to maintaining a workplace that provides every employee freedom from harassment or hostility. People who work for our company are entitled to be treated with dignity and respect, and that common sense and professionalism must dictate the way that workers treat their colleagues and co-workers. All workplace violence must be reported and investigated, and a risk assessment completed, to determine the risk of workplace violence.

The policy includes the following definitions:

Harassment: *Any behaviour (conduct or comments) that is unwelcome and has the purpose or effect of humiliating an individual, substantially interfering with an individual's work performance, or creating an intimidating, hostile, or offensive work environment.*

Violence: *Any behaviour which would be interpreted by a reasonable person as being a substantial threat of physical action intended to harm or endanger the safety or well being of another employee, or to destroy property of Krawford Construction or their clients.*

Racial / Ethnic / Personal Harassment means:

- *Discriminatory behaviour including name calling, racial slurs, graffiti, and posters based on: age, gender, race, colour, religion, national origin, sexual orientation, disability, or any other ground of discrimination that is prohibited by human rights legislation.*

Sexual harassment includes:

- *Unnecessary physical contact*
- *Inappropriate touching*
- *Repeated offensive sexual flirtation*
- *Offensive calendars or posters*
- *Unwelcome advances or propositions*
- *Inappropriate comments, suggestions, jokes, or leering*

Krawford Construction will instruct all employees during their orientation on how to recognize workplace violence. The policy, procedures, and workplace arrangements that effectively minimize or eliminate workplace violence and the appropriate response to workplace violence, including how to obtain assistance, and also the procedures for reporting, investigating, and documenting incidents or workplace violence.

The behaviour need not be intentional in order to be considered harassment.

Behaviour by any Krawford Construction employee that harasses, demeans, or threatens another employee will not be tolerated. An immediate investigation will be initiated whenever evidence or complaint of such behaviour becomes known. Krawford Construction will take whatever action necessary to correct the situation. Conduct which



is found to be harassing, threatening, or violent will be regarded as a serious matter and may be cause for disciplinary action including, where appropriate, dismissal.

Workplace violence is to be considered a hazard and must be treated as such. The supervision must implement control measures as they apply to ensure a violence-free workplace for all Krawford Construction worksites.

All employees have a responsibility to keep the workplace free from harassment and violence.

If an individual believes that they are being harassed or subjected to workplace violence, the individual should immediately inform the person that his/her behaviour is unwelcome and ask them to stop. If this action is difficult for the individual, they may ask for assistance from the immediate supervision, area coordinator, or manager.

Retaliation against the persons who bring a complaint of actual or perceived harassment or violence is strictly prohibited. Employees should not engage in adverse treatment of other employees because they have reported harassment or violent behaviour or, have provided information in connection with a report of such behaviour. Employees who believe they have experienced or observed retaliation should report it to their immediate supervision. Retaliatory behaviour may result in immediate discharge, disciplinary action, or other remedial action as deemed appropriate in the circumstances by Krawford Construction

A complaint of harassment or workplace violence that is intentionally fraudulent or malicious as distinctive from unfounded may be subject to disciplinary action.

It is the responsibility of the offender to stop the harassment immediately. If, after asking the offender to stop the behaviour, the harassment continues, the individual being harassed may contact their supervision, area coordinator, or manager for advice and assistance.

The normal application of coaching and/or corrective action is not considered harassment.

Krawford Construction will respond to all incidents according to governing OH&S Regulations. Krawford Construction will ensure that a worker is advised to consult a health professional of the worker's choice for treatment or referral if the worker:

- a) reports an injury or adverse symptom resulting from workplace violence, or
- b) is exposed to workplace violence.

Terry Tanasiuk, President

January 02, 2020

Date



1.8 PREVENTATIVE MAINTENANCE POLICY

It is the policy of Krawford Construction to maintain all tools and equipment in a condition that will maximize the safety of all personnel and reduce the risk of injury, damage, and lost production. This policy is designed to be in accordance with applicable Occupation Health and Safety legislation.

To this end, a “Maintenance Program” will be maintained which will include the following components:

- Adherence to applicable regulations, standards, and manufacturer’s specifications.
- Services of qualified maintenance personnel.
- Scheduling and documentation of all maintenance work.

Employees will check tools and equipment on a regular basis and shall remove from service any tools or equipment that poses a hazard because of required repairs or defects. Tools and equipment that have been removed from service will be destroyed or clearly tagged “**OUT OF SERVICE**” until the tool/equipment can be restored to its safe working condition.

Terry Tanasiuk, President

January 02, 2020

Date



1.9 SAFE DRIVING POLICY

Krawford Construction recognizes that driving is one of the most hazardous job functions an employee will perform. This policy ensures compliance with governing Occupational Health and Safety Regulations. The objectives of this policy are:

- To ensure the employees demonstrate safe driving practices at all times when driving in order to create the safest working conditions possible to achieve our goal of zero injuries or incidents.
- To maintain all company vehicles in a safe, clean, and roadworthy condition to ensure maximum safety of the driver, occupants, and other road users at all times.

1.9.1 Code of Conduct

While driving company vehicles, all employees must comply with current traffic legislation, be conscious of road safety, and other good road safety habits when driving on company business. The following actions in company vehicles will be viewed as a violation of this policy and subject to disciplinary action:

- Drinking or under the influence of drugs while driving
- Driving without a current driver's license
- Driving in excess of the posted speed limit or road conditions
- Failing to wear a seatbelt while operating a vehicle
- Reckless or dangerous driving
- Failing to stop at the scene of an incident
- Any actions that warrant suspension of a license
- Smoking in a company vehicle
- Improper use of a cell phone or texting while driving

1.9.2 Responsibilities

Employer

- Create and implement safe driving policies and procedures
- Communicate safe driving policies and procedures to employees
- Ensure new employees have a current and valid driver's license and are competent
- Ensure vehicles are maintained according to manufacturer's specifications
- Keep maintenance records for each vehicle



Employee

- Ensure they hold a current valid driver's license
- Participate in training and safe driving initiatives when required
- Immediately notify their supervision if any incident or near miss occurs
- Display the highest level of conduct while operating a company vehicle or a personally owned vehicle being used for company activities
- Assess hazards before and while driving
- Drive within posted speed limits and according to road conditions
- Wear seatbelts at all times
- Report vehicle deficiencies immediately
- Follow the maintenance policy set out by the employer
- Avoid fatigue while driving and take breaks when necessary

1.9.3 Pre-Use and Monthly Inspections

All employees will conduct a pre-use inspection of company vehicles prior to use to ensure the vehicle is roadworthy. Prior to each shift when a company vehicle will be used, the employee must conduct a walk around inspection of the vehicle using the appropriate check list provided.

Monthly, all company vehicles require a monthly inspection to ensure roadworthy conditions and comply with the maintenance policy. All items on the monthly checklist must be inspected and noted on the form, as required.

1.9.4 Vehicle Requirements

- All vehicles used for company business must be equipped with seatbelts and drivers and passengers must use them. Only passengers in buses are exempt from this requirement.
- Workers must not ride any part of the bodies outside the vehicle or stand in or on any vehicle while it is being operated.
- Workers must not get on or off a moving vehicle, except in an emergency.
- Tools and equipment carried in any part of a vehicle must be placed or secured to prevent interference with the operator, blockage of entry/egress, and injury to workers.
- When transporting material on vehicles, the load must be secured. If the load protrudes, it must be properly flagged.
- Safe working loads must not be exceeded.
- Every Krawford Construction owned vehicle assigned to a job shall have a designated person who will be responsible for its inspection, maintenance,



and safe condition. Where company vehicles are assigned to management or supervisory staff, the person the vehicle is assigned to shall be responsible for maintaining its inspection, maintenance, and safe condition.

1.9.5 Offences

Krawford Construction will not be responsible for any unsafe driving offences incurred by and employee in company vehicles.

1.9.6 Cell Phone

Krawford Construction is committed to the protection of all its resources, including employees and physical assets, from injuries and incidents associated with distracted driving.

For the purpose of this policy, a cellular device includes, but it not limited to, any cell phone, smart phone, or cellular enabled tablet. An electronic device includes, but is not limited to, laptop computers, video games, cameras, DVD players, and portable audio players (i.e. iPods).

- The use of any cellular device for any reason, including but not limited to texting, e-mailing, or web browsing, is prohibited when:
 - Driving a motor vehicle or operating a piece of equipment
 - While working in the vicinity of equipment being operated
 - While directing trucks or equipment, while flagging traffic, or while working in traffic
 - While performing, a physical job related task
- The use of any cellular-enable device for making or receiving phone calls is prohibited when driving a motor vehicle except when a voice-activated or hands-free device is used.
- The use of any cellular device for making or receiving phone calls is prohibited when:
 - Entering information into a GPS unit
 - Reading printed materials, writing, printing, or sketching
 - Performing any personal grooming habits
- The use of any electronic device for any reason is prohibited.

Krawford Construction's policy is listed below regarding distracted driving while operating any company owned, leased, or rented vehicles or equipment.

KCCI owned cellular devices are property of KCCI and must be treated, used, and safeguarded as such. If a phone call comes through while operating a company owned or rented vehicle, and a voice-activated or hands-free device is not available, or while operating a piece of equipment, it is KCCI's policy to allow the



call to proceed to voicemail. When it is safe to do so, pull over and park before answering or returning any phone call, text message, or email. Please respect the safety of all co-workers by leaving them a voicemail when calls are not completed. This will allow them to return the call when it is safe to do so. All KCCI employees are required to include on their voicemail that they may not have answered the phone because they are driving.

This policy has been created to ensure KCCI is and remains in compliance with Bill 16 – the Traffic Safety (Distracted Driving) Amendment Act, 2010. If an employee is found to be in contradiction of this policy, they will be subject to disciplinary actions under the KCCI Disciplinary Policy and could face penalties under the amended act. All penalties received as a result of violating this policy and the Act will be the responsibility of the operator and at no time will be subsidized by KCCI.

A handwritten signature in blue ink, appearing to read 'T. Tanasiuk'.

Terry Tanasiuk, President

January 02, 2020

Date



1.10 WORKING ALONE POLICY

The Krawford Construction Working Alone Policy commits to providing a safe and healthy environment for all Employees. This policy extends to ensuring risk is minimized when Employees are working alone or conducting fieldwork. Working alone in certain circumstances, situations, or environments can be unsafe and requires special arrangements to minimize potential situations and hazards.

1.10.1 Responsibilities

Employer

- Ensuring working alone procedures are developed, implemented, communicated, and enforced in situations where employees are working alone or conducting fieldwork outside of normal working hours.
- Supervision are required to review with employee each worksite work alone situations under his/her control, where there is an increased risk of injury or assistance is not readily available.
- Must ensure all reasonably practical steps are taken to protect the health and safety of the Employees.
- Define the type of work and duties which may or may not be conducted while working alone, and under which conditions working alone is permitted.
- Must have contact with Employee during work alone by agreed time and contact method.
- Must have a plan if contact is not made when scheduled.

Employee

- Must comply with the working alone policy.
- Identify and take any necessary steps to eliminate or reduce working alone hazards.
- Maintain regular contact with designated person while working alone.
- Follow working alone safe work practices and procedures.

1.10.2 Reducing Hazards

- A phone or cellular phone.
- Any other means that provides effective communication commensurate with the risk involved (such as personal alarm devices).
- Maintaining regular contact with the person working alone.
- Providing emergency supplies depending upon site conditions.
- When driving to jobsites, signing out when leaving the shop and making contact upon arrival to jobsite.
- Utilize the buddy system.



1.10.3 Guidelines for Working Alone Hazard Assessments

It is essential the Employees and Supervision work together to assess the work site. It is mandatory that the working conditions or circumstances that present high safety risks be assessed so the probability of incident or injury can be minimized. Supervision and Employees will evaluate working alone assignments on a job-to-job basis and consider the following risk factors for working alone:

- Tasks and hazards involved in the work to be performed.
- Consequences resulting from a “worst case” scenario. This will be accomplished by asking the question “what if?”
- Likelihood for other persons to be in the area.
- Possibility that a critical injury or incident could prevent the employee from calling for help or leaving the workplace.
- Emergency response time.
- Worker’s training and experience.
- Worker’s physical limitations and abilities or any pre-existing medical conditions.
- Frequency of job supervision, if at all.

Terry Tanasiuk, President

January 02, 2020

Date



1.11 ALCOHOL AND DRUG POLICY

Krawford Construction Company Inc. has established an Alcohol and Drug Policy

- (a) to provide a safe work environment for its employees and those whose safety may be affected by the conduct of its employees, and
- (b) to ensure that all employees are treated fairly and with respect.

While employed or providing subcontract services for Krawford Construction Company Inc., everyone must be aware of and comply strictly with the following company rules concerning alcohol and drugs:

- No one can be unfit for work due to the use or after effects of alcohol, cannabis, prescription medication or illicit drugs.
- The use, possession, distribution, offering for sale of illicit drugs, or drug paraphernalia, the possession, distribution or sale of prescription medication of illicit or illegal drugs is strictly prohibited.
- The use, possession, distribution, or sale of alcoholic beverages on worksites, or in company owned, rented, or leased equipment, is strictly forbidden.
- The use, possession, distribution, or sale of cannabis products on worksites, or in company owned, rented, or leased equipment, is strictly forbidden.
- Everyone is expected to use medication, both prescription and over-the-counter, responsibly. Anyone who is on medication that may inhibit a person's ability to perform their job safely and productively is required to inform their immediate supervisor.
- Krawford Construction Company Inc.'s supervisor, upon having reasonable grounds to believe that an employee involved in an incident, near miss, or other potentially dangerous incident is a result of intoxication, may request the employee involved submit to an alcohol and drug test. (Refer to Krawford Alcohol and Drug procedure for more information).

Terry Tanasiuk, President

January 02, 2020

Date



1.11.1 Purpose

The company has established this alcohol and drug policy to provide a safe workplace for its employees and for those whose safety may be affected by the conduct of its employees and to ensure that its employees are treated fairly and with respect.

Through the development of an alcohol and drug policy:

- (a) the company is promoting the safety and dignity of its employees,
- (b) the welfare of its employees and their families,
- (c) the best interests of the company, the industry and the public.

Krawford Construction's Alcohol and Drug Policy meets the COAA Canadian Model for providing a safe workplace and uses a reputable testing facility to provide these services.

1.11.2 Definitions

Words used in this policy shall have the following meaning:

- a) **"alcohol"** means any substance that may be consumed and that has an alcoholic content in excess of 0.5 percent by volume;
- b) **"alcohol and drugs"** means alcohol or drugs or both;
- c) **"alcohol and drug test"** means a scientifically recognized test which analyzes an individual's urine, breath or in certain situations, saliva, for evidence of drug or alcohol exposure;
- d) **"company business"** includes all business activities undertaken by individuals during the company's operations whether conducted on or off the company workplace for which the individual is compensated;
- e) **"company property"** and **"company workplace"** means all real or personal property, facilities, land, buildings, equipment, containers, vehicles and aircraft whether owned, leased or used by the company and wherever the company conducts business;
- f) **"drug paraphernalia"** includes any personal property which is associated with the use of any drug, substance, chemical or agent the possession of which is unlawful in Canada;
- g) **"drug"** means any chemical or biological substance (including alcohol) that has known mind or motor function altering effects on the human body - a general term for any substance, stimulating or depressing, that can ultimately be habituating or addictive. For the purposes of this policy, drugs of concern are those that inhibit a worker's ability to perform his or her job safely and productively;
- h) **"employee"** means any person on the company payroll;
- i) **"employee assistance program"** means services that are designed to help employees who are experiencing personal problems such as alcohol and drug abuse;



- j) **"fitness for work/duty"** in the context of this policy means being able to safely and acceptably perform assigned duties without limitations due to the use or after-effects of Alcohol, Illicit or Illegal Drugs or Medications;
- k) **"illegal drug"** means any drug or substance which is legally obtainable but has not been legally obtained (e.g. sedatives for which a prescription should have been obtained);
- l) **"illicit drug"** means any drug or substance which is not legally obtainable and whose use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g. street drugs such as marijuana and cocaine);
- m) **"impairment"** means that an employee's normal physical or mental abilities, or faculties, while at work have been detrimentally affected by the use of alcohol or drugs;
- n) **"laboratory"** means a certified laboratory under the Mandatory Guidelines for Federal Workplace Drug Testing Programs established by the Substance Abuse and Mental Health Services Administration of the United States Department of Health and Human Services;
- o) **"Mandatory Guidelines"** means the Mandatory Guidelines for Federal Workplace Drug Testing Programs established by the Substance Abuse and Mental Health Services Administration of the United States Department of Health and Human Services;
- p) **"medical review officer"** means the licensed physician who is designated to fill the position of medical review officer under the Mandatory Guidelines;
- q) **"medication"** refers to any substance used for medicinal purposes which is obtained through prescription or over the counter;
- r) **"negative test result"** means a report from the medical review officer that the employee who provided a specimen for alcohol and drug testing did not have a concentration level in excess of that set out in section 3;
- s) **"owner"** means the person in legal possession of a workplace;
- t) **"positive test result"** means a report from the medical review officer that the employee who provided a specimen for alcohol or drug testing did have an alcohol or drug concentration level in excess of that set out in section 3;
- u) **"reasonable grounds"** or "reasonable cause" includes information established by the direct observation of the employee's conduct or other indicators, such as physical appearance of the employee, his or her attendance record, circumstances surrounding an incident, near miss or potentially dangerous incident and the presence of alcohol, drugs, or drug paraphernalia in the vicinity of the employee or the area where the employee worked;
- v) **"safety sensitive position"** means individuals with responsibilities of a significant and risky nature such that even a momentary lapse of attention would reasonably be expected to have a direct negative impact on the health or safety of employees, contractors, clients, the public, or the environment, or could lead to significant property damage, and where frequent or continual operational checks would not eliminate such health or safety risks;



- w) **"scheduled call"** means employees who have been designated as being on-call in accordance with a written schedule and who have been notified of such duties by their supervision;
- x) **"work"** includes training and any other breaks from work while on company property or a company workplace.

1.11.3 Policy Standards

All employees of Krawford Construction are expected to remain free from any adverse performance effects of alcohol or other drugs, adhere to fitness for duty standards as set forth below, and conduct themselves in an appropriate manner while on company business or at the company workplace.

Everyone is expected to report to work fit for duty, and remain fit throughout the work day or shift. If unexpected circumstances arise where an employee is requested to perform services outside of their regularly scheduled hours and has recently consumed alcohol or drugs, the individual is expected to request that responsibility be delegated to another employee.

a) Illicit and Illegal Drugs

The following drugs are prohibited when on company business or at a company workplace and at all times when on duty or scheduled call, including during meals or other breaks (whether on or off company property):

- a) the use, possession, distribution, offering or sale of illicit drugs or drug paraphernalia;
- b) the possession, distribution, offering or sale of prescribed medications (illegally); and
- c) reporting for work under the influence of illicit drugs or having a drug test resulting in detectable levels of the following drugs:

<u>Drugs or classes of drugs</u>	<u>Concentration in excess of ng/ml</u>
Marijuana metabolites	5
Cocaine metabolites	100
Opiate metabolites	2000
Phencyclidine	25
Amphetamines	250
Acetylmorphine	10
Ecstasy	250

b) Alcohol

The following are prohibited when on company premises or at a company workplace:

- a) possession, distribution, offering or sale of alcohol;
- b) reporting for duty under the influence of alcohol, or;



- c) use of alcohol within the first eight hours after an incident or until tested or advised a test is not required.

In addition, employees are prohibited from using alcohol when on scheduled call.

c) Medications

Everyone is expected to use medications, both prescribed and over-the-counter responsibly. The intentional misuse of prescribed medications, over-the-counter medications and other substances while on company business or at a company workplace is prohibited. Misuse of medication includes:

- a) taking in excess of the prescribed or recommended amount of medication;
- b) taking medication prescribed for someone else;
- c) taking medication for other than its intended purpose; or
- d) taking medication improperly (e.g. in combination with alcohol).

Medications of concern are those that inhibit an individual's ability to perform their job safely and productively. Accordingly, employees are expected to investigate, through their physician or pharmacist, whether a medication can affect their abilities, and take appropriate steps to minimize the associated risk, which would include advising his/her supervision of any concerns and abiding by any requirement for modified work or other appropriate course of action to minimize the risk. An employee should notify management of prescribed medications that may impair motor skills so that appropriate scheduling can occur.

Management of Krawford Construction will take reasonable and practicable steps to prevent over-consumption of alcohol, and to provide alternative means of transportation in order to reduce the risks associated with impaired driving.

d) Implementation

i. Education

Krawford Construction is committed to informing employees of the existence of this alcohol and drug policy and to taking such other steps as are reasonable to inform its employees of the risks associated with the use of alcohol and drugs and the assistance available under the company's employee assistance program.

ii. Self-Help

A foreman, supervision or manager of an employee who is concerned about an employee's ability to comply with this policy must:

- (a) inform the employee of his or her concern and the assistance available under the company's employee assistance program,
- (b) encourage the employee to utilize the employee assistance program which may assist the employee, and



- (c) inform the employee that if he or she fails to utilize the company's employee assistance program the company may insist that the employee submit to:
 - (i) a medical assessment conducted by a physician, or
 - (ii) alcohol and drug testing as set out in 15.4.9, or
 - (iii) both

and that his or her failure to do so may result in the termination of his or her employment with cause.

An employee who believes that he or she may be unable to comply with the alcohol and drug policy and voluntarily requests help to enable him or her to comply with the alcohol and drug policy before he or she fails to comply with the alcohol and drug policy or is requested to confirm compliance with the alcohol and drug policy under 15.3 or to submit to an alcohol and drug test under 15.4.9 will not be disciplined for requesting help.

An employee who believes that he or she may be unable to comply with the alcohol and drug policy may:

- (a) contact a person responsible for the administration of the company's employee assistance services program,
- (b) inform a family member or friend of his or her problem and ask for assistance in contacting a person responsible for the administration of the company's employee assistance services program, or
- (c) inform a supervision or a representative of the company of his or her wish to contact a person responsible for the administration of the company's employee assistance services program.

An employee who receives assistance from the company's employee assistance program on account of his or her problem must comply with the terms and conditions of any program established to help the employee with his or her problem as a condition of his or her continued employment.

An employee who is at work and enrolled in the employee assistance program must comply with this alcohol and drug policy.

e) Possession of Alcohol and Drugs

A representative of the company or the owner who has reasonable grounds to believe that an employee may not be in compliance with section 15.3 of this policy must request an employee to confirm that he or she is in compliance with section 15.3 and must explain to the employee why the request is being made or request the assistance of appropriate authorities to confirm compliance with section 15.3 of this policy.

Krawford Construction reserves the right to conduct searches of company vehicles



and property, based on reasonable suspicion of use or possession of substances prohibited under the Krawford Construction Alcohol and Drug Policy.

f) Reasonable Cause

A supervisor or a manager of an employee who has reasonable cause to believe that the actions, appearance or conduct of an individual while on duty are indicative of the use of alcohol or drugs, after consultation with management, may ask the employee to submit to an alcohol and drug test and explain to the employee why the request is being made. Referral of an employee for an alcohol and drug test will be based upon specific, personal observations including, but not limited to:

- a) observed use or evidence of use of a drug or alcohol;
- b) changes in job performance;
- c) erratic or atypical behaviour;
- d) changes in physical appearance;
- e) changes in behaviour; or
- f) changes in speech patterns.

Reasonable cause testing will be conducted as soon as reasonably practicable once the determination has been made that reasonable cause exists.

g) Safety Sensitive Position

Management shall determine and document which positions are deemed as safety sensitive positions within Krawford Construction. A client may define other safety sensitive positions for employees working on their work sites.

An employee offered a safety sensitive position must submit to an alcohol and drug screen prior to commencing work and on an annual basis or as required thereafter, as a condition of employment.

h) Post-Incident

A supervisor or manager of an employee, who after consultation with company management, concludes that there are reasonable grounds to believe that an employee was involved in an incident, near miss or other potentially dangerous incident may request the employee submit to an alcohol and drug test, immediately following the incident, near miss and must explain to the employee why the request is being made. Generally, the following criteria will act as triggers for post-incident testing:

- a) any lost time injury;
- b) any potentially serious event;
- c) motor vehicle incident;
- d) any circumstances or conditions dictated by client policy



i) Contractually Obligated Testing

An employee may be tested when in the course of business as stipulated in contract between Krawford Construction and its client.

j) Refusing to Test

Failure to report directly for a test, refusal to submit to a test, refusal to sign the required acknowledgment form, refusal to agree to disclosure of a test result to management or a confirmed attempt to tamper with a test sample are all considered violations of this policy and are grounds for disciplinary actions up to and including termination.

k) Conducting Alcohol and Drug Tests

The company agrees to conduct alcohol testing in accordance with the Canadian Department of Transportation Alcohol Testing Program, except where breath alcohol testing devices are not readily available, and drug testing in accordance with the Mandatory Guidelines established by the Substance Abuse and Mental Health Services Administration of the Canadian Department of Health and Human Services to ensure the accuracy and confidentiality of test results. If breath alcohol testing devices are not readily available, the company agrees to conduct alcohol testing using a procedure incorporating initial saliva and confirmatory urine testing or, if the employee requests and it is practicable to comply with the request, a blood alcohol test.

Alcohol and drug testing is conducted to determine the presence of marijuana metabolites, cocaine metabolites, opiate metabolites, phencyclidine, amphetamines, Acetyl morphine, Ecstasy and ethanol in the specimen provided by the employee.

An employee who wishes to review the Department of Transportation Drug and Alcohol Testing Program and the Mandatory Guidelines may request an opportunity to review these documents.

By continuing his or her employment with the company the employee accepts the terms of this alcohol and drug policy and authorizes the laboratory to provide the test results to the company or any person with legal authority to require the disclosure of the test results.

1.11.4 Alcohol and Drug Testing Result

A report from the medical review officer to the designated company representative that the employee's sample produced a negative test result means that the employee complied with section 3 of this drug and alcohol policy.

The designated company representative will notify the employee of the negative test result and that no other steps under this alcohol and drug policy will be taken. It may be appropriate to pursue procedures under other policies or take other steps, including a medical assessment, in order to assist the employee to perform at a satisfactory level.



A confidential written report from the medical review officer to the designated company representative that the employee's sample produced a positive test result means that the employee failed to comply with section 3 of this drug and alcohol policy.

In order to preserve the confidentiality of test results, the designated company representative and any person to whom disclosure is permitted under this alcohol and drug policy must not disclose the test results to any person other than a person who needs to know the test results to discharge an obligation under this alcohol and drug policy.

1.11.5 Failing to Comply with the Alcohol and Drug Policy

The company may discipline or terminate for cause the employment of an employee who fails to comply with the alcohol and drug policy. The appropriate consequences are case dependant, the non-compliance will be investigated and will include the nature of the violation, the existence of prior violations, the response to prior corrective programs and the seriousness of the violation.

If the company terminates the employment of an employee who failed to comply with the alcohol and drug policy, it may give the person who failed to comply written notice that the company will not employ the person again unless the person provides the company with the following:

- (a) a certificate issued
 - (i) by the facilitator of a rehabilitation program certifying that the person who was terminated has successfully completed its rehabilitation program and continues to comply with all the requirements of the rehabilitation program, or
 - (ii) by a licensed physician with knowledge of substance abuse disorders certifying that the person who was terminated is able to safely perform the duties he or she will be required to perform if employed by the company, and
- (b) a statement signed by the person who has been terminated acknowledging that he or she agrees to other reasonable conditions imposed by the company.
- (c) The employee agrees to enter into a random testing agreement for a period of up to two years.

Employees found not in compliance with this policy will not be considered for rehire for a minimum of 30 days. Returning employees maybe subject to further testing and conditions as part of the return to work.



1.12 GENERAL HOUSEKEEPING

All employees are encouraged to take personal initiative in following the procedures outlined in this document and to continually contribute to a safe, clean, and orderly environment. All employees will work towards maintaining their respective workplaces in a clean and orderly manner.

Housekeeping encompasses all activities related to the cleanliness of buildings, materials, and equipment, and the elimination of non-essential materials and hazardous conditions. The following general housekeeping practices must be applied to all Krawford Construction worksites and all areas where employees perform maintenance, construction, or other activities:

- Garbage, scrap, debris, and other trash materials are to be properly disposed of in designated containers and shall be removed on frequent and regular intervals. Containers used for garbage and other oily, flammable, or hazardous wastes shall be equipped with covers and labelled.
- Material and equipment will be stores only in appropriate storage locations.
- Floors should be maintained clean and dry as reasonable practicable. Liquid spills are to be cleaned up immediately.
- Equipment is to be kept clean and in good working condition.
- Individual work areas are to be kept clean to ensure that work activities may proceed in an orderly and efficient manner.
- Tools, supplies, parts, and equipment will not be used in a manner that would be hazardous or adversely affect the work quality. Control should be used to ensure that the work area is maintained in an acceptable manner.
- Trenches, pits, or sumps are to be covered or barricaded at all times.
- Shelved items must be place in an orderly manner and arranged so that the items cannot easily fall while nearby items are being retrieved.
- Items will not be placed in front of shelves so that employees must climb or reach over the items stored in front of the shelves to retrieve the items.
- Storage or unnecessary combustible, such as cardboard boxes, is discouraged.
- Items stored shall remain 18" below the plane of sprinkler heads, or 24" below the ceiling in areas without automatic sprinkler systems.
- Every floor, working place, and passageway shall be kept free from protruding nails, splinters, loose boards, and unnecessary holes and opening.

Good housekeeping is the day-to-day responsibility of all employees and is a continual process. It is the Superintendent's/Foreman's responsibility to regularly inspect all work areas under their direction and ensure good housekeeping practices are being followed.

Terry Tanasiuk, President

January 02, 2020

Date



1.13 TRAINING & DEVELOPMENT POLICY

Krawford Construction is committed to providing training and professional development for all employees. Krawford Construction believes that continuous learning and workforce development are essential to providing our clients with the high level of service to which they have become accustomed. A well managed training and development program can deliver people with the right skills at the right time to enable the organization to deliver strategic results.

Training can be a stimulant for workers. It boosts employee morale and is a motivator. It will reinforce good habits and provide ways to improve quality and productivity. Continual training is vital to stay competitive and keep up with current business practices.

All Krawford Construction employees are required to attend the minimum training required for their job function. Training can be delivered in a variety of ways from toolbox talks, on-the-job, in-house sessions, and formal training from a reputable third-party trainer.

All training will be documented in the employee's training file and will be kept on file for the duration of employment. In certain cases, training received prior to starting with Krawford Construction will be taken into consideration, provided that it was obtained through a qualified, recognized, and reputable trainer or organization.

It is the employee's responsibility to ensure that their training is up to date and to inform their supervisor when re-training is required. The supervisor is responsible for ensuring that employees are booked and re-certified in a timely manner. Employees that have allowed their certifications to lapse will not be allowed to operate or control the equipment or machinery until they have been recertified.

Specific training sets will be laid out in Section 5 of the Health and Safety Program. These training sets are subject to change depending upon workplace requirements and are a minimum standard to which we will adhere.

Terry Tanasiuk, President

January 02, 2020

Date



1.14 MODIFIED DUTIES POLICY

Krawford Construction considers no phase of our operations to be more important than **the well being of its most valuable asset – our employees.**

When an employee suffers illness or injuries that result in absence from the workplace, not only is the employee's personal life affected, but also the entire organization suffers as a result of the individual's inability to contribute.

To hasten a disabled employee's return to work, or keep the employee on the job, Krawford Construction will make every attempt possible to provide meaningful modified work duties to assist in rehabilitation and restoration to healthy and productive normal work duties.

As a general rule Krawford Construction will not provide modified duties for employees injured in non-work related injuries due to liabilities. Should an employee require modified work for a non-work related injury management will determine the suitability for modified work and the risks associated with providing modified work to the employee.

Refer to Modified Duties Code of Practice in the Appendix Section

Terry Tanasiuk, President

January 02, 2020

Date



1.15 STRETCHING POLICY

At Krawford Construction we believe that a healthy workplace starts in the field. Ensuring our employees are warmed up and ready for the day’s work is very important and, as such, stretching can make the difference between a fit, healthy employee and an employee that is at risk for a muscular-skeletal injury. Our goal at Krawford is to ensure all our employees go home every day uninjured. We believe that a program allowing our employees to complete 15 minutes of stretching before each shift is progressive step in providing the resources to attain a safer work environment.

Prior to the beginning of each shift of work, supervisors will lead the crew in a 15-minute warm up of stretching. The areas that should be included in the stretching are as follows:

- | | | |
|------------------|------------|------------|
| Neck | Latts | Quads |
| Shoulders | Lower back | Hamstrings |
| Biceps / Triceps | Core | Calves |
| Forearms | Hips | Ankles |
| Wrists | | |

Stretching is recommended and encouraged but is not mandatory. Workers are encouraged to respect their physical limits and abilities should they choose to participate in the stretching program.

No phase of a Krawford Construction project is ever more important than **the well being of its most valuable asset – our employees.**

Terry Tanasiuk, President

January 02, 2020

Date



1.16 SMOKING POLICY

Krawford Construction is committed to providing a safe workplace for all employees. The process we take to ensure a safe and healthy environment for employees is to make sure all potential workplace hazards are recognized, identified, and controlled, and that all employees have adequate protection from the hazards created or introduced in the workplace.

Smoking is defined as:

- *Smoking, holding, or otherwise having control over an ignited tobacco product, vaporizer, or electronic cigarette.*

Krawford Construction will ensure as a minimum that:

- All employees are aware of and have access to information regarding the Tobacco Reduction Act.
- No employee shall smoke with in the parameters of any Krawford Construction property, office or job site.
- No employee shall smoke in an enclosed place of employment, job shack, building, or enclosed workspace.
- No employee shall smoke within five (5) metres of any doorway, window, or air intake of a public place or workplace.
- The hazards of second-hand smoke and the potential sources of ignition in the workplace will be discussed with all employees.
- Designated smoking areas will be provided where appropriate, and will ensure appropriate safety precautions are taken to protect people and property.
- This smoking policy is posted at worksites and/or available to employees.
- Smoking will not be permitted in company vehicles.
- Any fines relating to non-compliance with this policy will be the employees' responsibility.

Terry Tanasiuk, President

January 02, 2020

Date



1.17 ENVIRONMENTAL PROTECTION POLICY

Krawford Construction is committed to environmental protection in all business activities. Management will ensure compliance with all applicable laws and industry Codes of Practice. We recognize that environmental protection is a matter of public interest as well as good business practice. Our employees will continue to be aware of environmental issues and will strive to provide solutions in order to secure environmental protection today and into the future.

- Potential environmental impact occurring from Krawford Construction business activities will be addressed during the planning stages of the project.
- Our goal is to avoid environmental damage where possible and to mitigate where avoidance is impractical.
- The application of stringent environmental standards ensures that adverse impacts are avoided, minimized, or effectively mitigated.

Although normal operations generate minor amounts of waste, Krawford Construction strives to minimize waste products. Waste products are collected, recycled, or disposed of with licensed waste handlers and facilities according to the characteristics of the product.

Working together, employees and management have an opportunity to assist in creating a health and clean environment for the benefit of future generations and ourselves.

Terry Tanasiuk, President

January 02, 2020

Date