

1.0 INTRODUCTION

The purpose of FLINT's Health, Safety, and Environmental Management System (overall referred to as the Safety Management System or SMS), is to ensure that all our activities are planned, carried out, controlled and directed with consistent, approved, health, safety and environmental management practices, procedures or standards.

The FLINT Safety Management System is aligned with our corporate Mission Statement, Core Purpose, and Core Values:

Mission Statement

- We will be the service provider of choice for our stakeholders

Core Purpose

- Helping Customers Bring Resources to Our World

Core Values

- Safety & Quality Always
- Lead
- Collaborative
- Competitive

Adhering to the FLINT Mission Statement, Purpose and Values always ensures our business priorities are achieved, while managing (reduce or eliminate) overall impacts to people, the environment, assets, and our company's reputation.

2.0 SAFETY MANUAL OVERVIEW

The FLINT Safety Management System (SMS) assists with the integration of HSE processes and responsibilities into other business requirements and activities. The FLINT SMS manual is the document to be utilized by all employees to ensure support of Health, Safety, and Environmental policy requirements documented by the company.

The FLINT SMS manual shall be used as the standard to develop a Project Specific Safety Plan (PSSP) that meets or exceeds the requirements of legislations and client expectations.

The FLINT SMS and associated Project Specific Safety Plans (PSSP) shall be issued and revised as controlled documents to support FLINT safety goals and maintain operational consistency. The most current version of the SMS Manual can be found on the company intranet (ClearNet). The SMS is reviewed as a minimum annually by management, supervision and/or HSE personnel for currency and accuracy of information. Further, the SMS may be revised throughout a given calendar year as may be required due to policy, procedure, or regulation change. When a revision is required due to a regulatory change, the SMS will be updated prior to the effective date of the regulation change.

The Director of HSE will maintain membership with applicable organizations such as the provincial chapters of Health & Safety Professionals of Canada (HSPC) and ENSERVA to ensure consistent communication of legislative changes. Communications from these organizations will be saved on ClearNet and included when conducting reviews of the SMS.

FLINT recognizes that projects vary considerably in size, duration, scope, and hazard potential. The standards, practices and procedures contained in this manual are typically applicable to large projects of substantial duration. For smaller projects of shorter duration, practical consideration will dictate only those portions of the manual to be utilized in the development of the project specific safety plan. However, full compliance with all applicable environmental and safety regulations is the minimum acceptable standard.

SAFETY WITHOUT COMPROMISE (SWC) – Is the brand standard for all Health Safety Environmental Policies – Practices – Procedures and other associated HSE information. “Safety without Compromise,” demonstrates a PROACTIVE commitment towards continuous safety performance improvement, focusing on the fundamentals of Safety by Design, and the management of leading (safety) indicators, (ex. completing a Field Level Hazard Assessment – FLHA prior to commencing work). For access to information, concerns, and issue resolution contact your area Safety professional and/or FLINT Supervisor for support and follow up.



3.0 HEALTH, SAFETY and ENVIRONMENTAL POLICY

It is the policy of FLINT to ensure that each employee is provided with safe and healthy working conditions, free from recognized hazards. All employees will comply with established policies and procedures. These policies have been developed to meet or exceed the legislative requirements of provincial or federal Occupational Health, Safety and Environmental – Acts – Regulations and Codes.

FLINT Health, Safety and Environment Manual is to be used as a guide to successfully recognize, evaluate, and control unsafe acts and conditions that may lead to an incident. FLINT believes that all incidents are preventable. This objective can be achieved by consistent application of Safety Management Systems.

The following page shows a copy of the Health Safety and Environmental Policy approved and signed by our CEO Barry Card and COO Neil Wotton.



HSE POLICY STATEMENT



Date: January 1, 2024

Safety, Quality and Environmental Sustainability is not a choice, it's a lifestyle. At FLINT, we believe in supporting a safe work environment and ensuring the safety of all our employees and our clients. We recognize Safety as a Core Value of our business.

Safety, Quality and Environmental Sustainability are non-negotiable. We believe that the prevention of occupational injury, illness, and mental health always takes precedent, even over operating productivity. Compliance with Federal, Provincial and Local legislation, as well as client and industry safety and environmental standards, must be always maintained.

We all have a role to play. Our Health and Safety program is built on best practices and industry leading safety management systems. To be successful, such a program must start with proper attitudes toward injury and illness prevention on the part of all employees: having the right to know, right to participate, and the right to refuse. It also requires cooperation on all Health and Safety matters, not only between management and employees, but also between each employee and their co-workers.

We recognize the responsibilities of Health, Safety and Environment are shared:

- The Company accepts responsibility in leading the Health and Safety program and for its effectiveness and improvement.
- Supervisors and Managers are responsible for developing the positive attitudes towards Health and Safety in themselves and those they supervise, and for ensuring that all operations are performed with the utmost regard for the Safety and Health of those involved.
- Employees are responsible for wholehearted, genuine cooperation with all aspects of the health and safety program.
- The Company provides education to participating personnel, thus enabling them to understand and share in the responsibility for monitoring and protecting the environment.
- The Company maintains an effective reporting and communication system and develops project action plans commensurate with company standards and regulatory/client requirements.

We make responsible decisions, and we believe in safety and environmental sustainability by applying our core values and upholding our code of conduct.



Barry Card, Chief Executive Officer



Neil Wotton, Chief Operating Officer

4.0 SAFETY CULTURE

FLINT's Safety Culture is based on two fundamental principles:

A. "Safety is Line Management Driven".

Safety responsibilities and expectations for all levels of Line Management are clearly identified and communicated. Safety training is provided to enable Supervisors to fulfill their obligations.

B. "Employee Responsibility and Accountability"

Safety performance is measured through analysis of safety statistics and evaluation of safety activities (leading indicators) and the analysis of safety statistics (lagging indicators). These results are closely monitored and reviewed monthly by Executive and Senior Management.

Employees are provided with policies, practices, and procedures, regularly updated to reflect the industry's best practice to perform tasks. Employees are responsible to review and follow these as directed and will be held accountable through validation in the field by leadership.

HSE Philosophy

Safety is embedded in FLINT's core values as follows:

SAFETY & QUALITY ALWAYS

- We provide a safe, progressive, and proactive work environment
- We work together to ensure that high-quality services and products are delivered to our clients on schedule and budget
- We minimize the impact to our planet

We strive to continuously improve our HSE programs and performance in alignment with our business priorities and goals, customer expectations, public and regulatory requirements.

Demonstrating Leadership

FLINT is committed to providing a safe and healthy work environment for all personnel, Leadership engagement is measured through monthly key performance indicators. (KPI)

"Everyone who undertakes or has the authority to direct how another person does work or performs a task, is under a legal duty to take reasonable steps to prevent bodily harm to that person, or any other person, arising from that work or task".

Our Goal is to achieve a Culture of Safety without Compromise

Safety is a pillar of FLINT operations. FLINT is committed to achieving safety excellence on all projects and facilities. No work is so important that it cannot be done safely.

Responsibility and Awareness

Safety is a "line management" responsibility. Senior management is responsible for planning, implementing, and monitoring our safety management system. Each staff member then has specific safety responsibilities included in each job description. These responsibilities are defined for Chief Executive Officer, Area Manager, District Manager, Project Manager, Superintendent, Foreman, and Tradesman, all of whom are accountable in turn for safety within their own jurisdictions.

Finally, all employees, clients and subcontractors are responsible for their own safety, too; they share the responsibility for the safety of other personnel on the project/facility. To encourage safety awareness and practice, FLINT measures all safety performance through various safety management systems to ensure all managers, supervisors and workers are meeting or exceeding safety expectations.

Working Together for Success

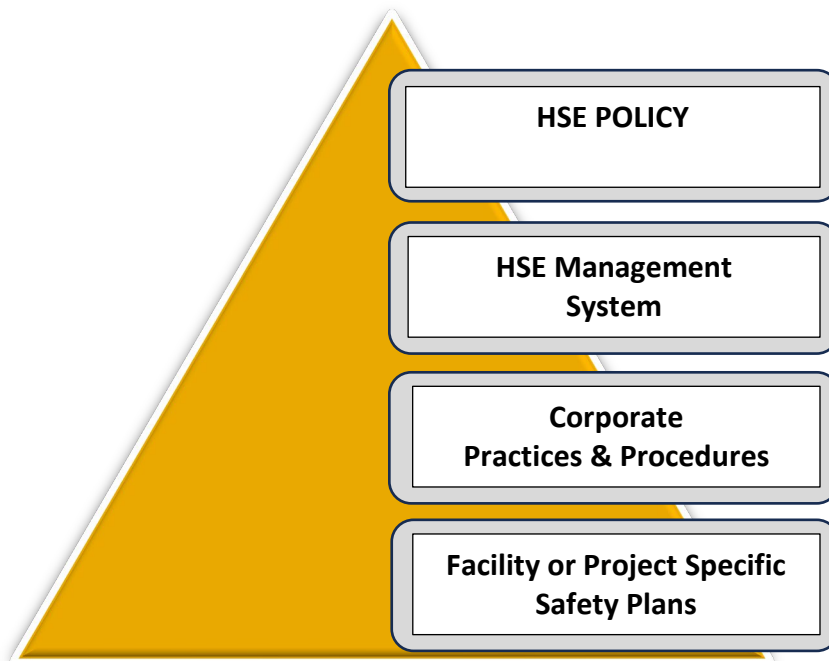
Safety cannot be "delegated" to safety specialists. The safety specialists support line management by assisting in jobsite training, serving as trained and knowledgeable observers, providing administrative assistance, monitoring, and evaluating the success of the safety program and acting to continuously improve our program. While this role is important, commitment

and active participation by everyone, every day, in every task, is necessary if we are to achieve the level of safety excellence that FLINT expects.

FLINT’s HSE management system is hierarchical. Mandatory requirements are established by the HSE policy, followed by the HSE management system standard, linked to other HSE system controls such as standards, codes of practices, safe job procedures, safe work practices, project specific safety plans and any other safe systems of work that fosters a safe environment at the work execution level (refer to diagram below).

Requirements at any level must meet and support the requirements at higher levels. The HSE policy and HSE management system standard apply to all FLINT controlled sites and activities. All relevant HSE documents and tools are available on the ClearNet portal (company intranet).

HSE Management System Hierarchy



5.0 CODE OF CONDUCT & ETHICS POLICY

Our Code of Conduct sets out general statements of conduct and ethical standards that we shall follow. The purpose of this policy is to ensure that all FLINT Corp. personnel have a clear understanding of the company’s expectations regarding their conduct and decision making at work, and to provide them with a clear understanding of what to do in the event that they witness unethical behavior at work or are faced with making a decision which may not be in alignment with our core values.

In Summary, our Code is:

- We avoid situations and relationships that result in a conflict of interest. We disclose actual or potential conflicts of interest.
- We engage in fair and just competition with our competitors.
- We conduct personal business with the Company only if it is officially authorized by an Officer of the organization.
- We maintain accurate business records and keep all private and sensitive information confidential. We treat each other with respect and fairness.
- We work safely in a healthy environment and strive to be environmentally responsible in all our business activities in accordance to the Company’s Health, Safety and Environment policy.

- We recognize that compliance with this policy is a condition of our employment. Annually, salaried staff and non-union hourly employees read and reaffirm our agreement to comply with this Code. Field workforce sign an acknowledgement form upon commencement of employment.

Norms of Ethical Behaviour

- Consider the interests of the corporation in all transactions and believe in its established policies.
- Be receptive to competent counsel from one's colleagues and be guided by such counsel without impairing the responsibility of one's office.
- Purchase without prejudice, seeking to obtain the maximum value for each dollar of expenditure. Do not engage in any activities that are or may be perceived to be improper or unethical. Work for honesty in buying and selling and to denounce all forms of improper business practice.

RULES OF CONDUCT

In applying these rules of conduct, employees should follow the guidance set out below.

Declaration of Interest

Any personal interest that may affect or that might reasonably be deemed by others to affect an employee's impartiality relevant to his or her duties should be immediately declared to his or her supervisor.

Confidentiality and Accuracy of Information

The confidentiality of information received in the course of duty must be respected and should not be used for personal gain; information given in the course of duty should be true and fair and not designed to mislead.

Competition

While considering the advantages to the corporation of maintaining a continuing relationship with a supplier, any arrangement that might prevent the effective operation of fair competition should be avoided.

Business Gifts and Hospitality

To preserve the image and integrity of the Employee or Contractor and the Corporation, the following guidelines shall be followed:

- Business gifts other than items of small intrinsic value (\$150 or less) should not be accepted from suppliers nor given to clients.
- Reasonable hospitality is an accepted courtesy of a business relationship.
- The frequency and nature of gifts or hospitality accepted or given should not be allowed whereby the recipient (employee, contractor, or client) might be or might be deemed by others to have been influenced in making a business decision because of accepting such hospitality or gifts.

Employees or Contractors shall not solicit for business gifts or hospitality for personal benefit. Suppliers may be solicited for business gifts of small intrinsic value (\$150 or less) in support of approved company functions.

Discrimination and Harassment

All employees shall abide by the corporation's Respect in the Workplace Policy.

Environmental Issues

Employees shall recognize their responsibility to environmental issues consistent with the corporation's goals and missions.

Interpretation

When in doubt about the interpretation of these rules of conduct, employees should refer to the Ethics Committee of the Corporation.

ENFORCEMENT PROCEDURES

The following procedures shall apply unless otherwise governed by provincial or federal legislation.

Ethics Committee

The Ethics Committee will consist of the Chief Operations Officer, Chief Financial Officer, and the Director of Human Resources.

Additional Information / Complaint Process

Requests for information or interpretation of the Ethics Policy should be directed to the Chief Executive Officer. Allegations of a breach to the Ethics Policy shall be made in writing by the witnesses to:

Chief Executive Officer - Ethics Committee**CALGARY, AB****Suite 3500, 202 - 5 Ave SW****Calgary, Alberta****T2P 2V7****Confidence line 1-800-661-9675**

Upon a receipt of the complaint, the Ethics Committee will send an acknowledgement of the receipt to the witness and will advise the accused in writing that he or she is under investigation, and the nature of the complaint.

INVESTIGATION

The Ethics Committee will investigate, which will include the opportunity for the accused to present his or her own version of the facts.

The Ethics Committee will, within a reasonable period, present its report to the CEO of the Corporation. The report will include the nature of the complaint and the decision as to the dismissal of the complaint, or the sanction to be applied. The CEO will then send the decision to the accused.

SANCTIONS

Where a case is proven an employee may, depending on the circumstances and the gravity of the charge, be reprimanded, suspended, or terminated. Details of cases in which employees are found in breach of the policy may be published in such a manner as the Corporation shall deem appropriate.

6.0 DISCIPLINE AND TERMINATION POLICY

Any person who does not follow the safety policies, procedures and work practices which have been developed by FLINT that are applicable to Government Regulatory authorities and client site requirements, shall be progressively disciplined as per the FLINT Discipline and Termination Policy

[Discipline and Termination Policy](#)

7.0 RESPECT IN THE WORKPLACE POLICY

The Company is passionately committed to ensuring a positive and professional working environment free of harassment where all people are treated with respect and dignity.

FLINT Respect in the Workplace Policy is document on the company intranet (ClearNet) under the Human Resources Department – [Respect in the Workplace Policy](#)

To support the objective of providing all employees with a healthy safe workplace, it is required that managers, supervisors, and workers take preventative action to ensure that risks to individual's health and safety due to violations of harassment are remedied and reported.

8.0 SMOKING POLICY

This Smoking Policy ensures that potential workplace hazards are recognized, identified and controlled, and that all employees have adequate protection from the hazards created or introduced in the workplace. The FLINT smoking policy is consistent with jurisdictional regulatory requirements, (Ex. the Alberta Tobacco and Smoking Reduction Act).

Smoking is defined as:

- Smoking, holding or otherwise having control over an ignited tobacco product, including electronic cigarettes (E-cigarettes).

FLINT will ensure that (Smoking Prohibited):

- No employee smokes in an enclosed place of employment (workplace), worksite or work-related area - the hazards of second-hand smoke and the potential source of ignition in the workplace will be discussed with the employees. Note: Workplace as defined by regulation includes “work vehicle” means a vehicle owned or leased by an employer and used by employees during their employment.
- Designated smoking areas are provided where appropriate and will ensure appropriate safety precautions are taken to protect people and property.
- This Smoking Policy is posted at the worksite and/or available to employees.

9.0 PERSONAL PROTECTIVE EQUIPMENT

The following will be observed and practiced by the company and employees when the company undertakes any job or contract.

- All PPE used by FLINT will be within the requirements of regulatory authority, ANSI/CSA standards.
- All PPE used by this company will be used and maintained in accordance with manufacturer’s instructions and requirements.
- The employee using PPE will inspect PPE at time of issue, and before each use.
- PPE damaged, needing service or repair, or of questionable reliability will be removed from service immediately.
- PPE that has been removed from service will be destroyed or tagged “OUT OF SERVICE”. Any PPE tagged “OUT OF SERVICE” will not be returned until repaired by a qualified person and inspected or replaced.
- The company will maintain appropriate inspection and service logs for specialty PPE.
- No piece of PPE will be modified or changed contrary to manufacturers’ instructions or specifications or OH&S Regulations

10.0 PREVENTATIVE MAINTENANCE

FLINT is committed to creating a safe working environment, including supplying the correct tools or equipment for a job. It is the responsibility of the employee to ensure that these tools and/or equipment are operated in a safe manner and not tampered with in any manner.

- The tools and equipment will be properly maintained, to reduce injury to employees or damage to property.
- Supervision will ensure qualified personnel carry out all maintenance work and all records and files are maintained.

All tools and equipment found to be defective will be appropriately tagged and removed from service. All tools and equipment that have been removed from service will be destroyed or clearly tagged “OUT OF SERVICE”.

All subcontractors are subject to tool and/or equipment inspection by FLINT.

11.0 INSPECTION(S)

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

- FLINT will maintain their inspection program by continually monitoring the worksite with both formal and information inspections.
- All formal inspections will be documented and kept on file for a period of one year unless it is part of incident investigation documentation. Follow the Records Retention and Destruction policy for file and email archiving and storage.

Management will ensure that the health and safety concerns identified in the inspections are addressed as soon as reasonably possible, (refer to the ClearNet (Corrective) Action documentation).

12.0 INVESTIGATION(S)

FLINT promotes the thorough investigation of all incidents that occur on our worksites.

- Accurate records and documentation shall be kept for investigations relating to all incidents.

- If a trend is identified, it will be identified and dealt with 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 followed as required.

All investigations will be followed up with recommendations and the appropriate action must be taken to prevent a similar event from occurring.

13.0 ENVIRONMENTAL & WASTE POLICY

FLINT has a detailed environmental policy endorsed by the CEO of our company establishing a standard of care for the all project and client work that is consistent with minimizing and eliminating environmental hazards through a rigorous (facilities, site, or workplace) assessment process. FLINT activities are always conducted with regulations and client standards. (Refer to Environmental SMS Element 12 for further details).

14.0 CELL PHONE & OTHER DRIVING DISTRACTIONS

The use of all hand-held mobile communication devices while driving is prohibited. Mobile communication devices include but are not limited to; all hand-held, mobile phones and other portable electronic devices that cause driver distraction such as tablets, GPS, DVD players, laptops, etc. As per the FLINT Vehicle Use, Safety and Maintenance Policy “drivers are permitted to use a cell phone in hands free mode – this means the device is not in the driver’s hand and is activated by voice or single touch to the device.

Employees shall not use a personal or company h a n d h e l d mobile communication device while driving a company vehicle; use a company mobile communication device while driving a personal vehicle; or use a personal mobile communication device while driving a personal vehicle on company business. Driving includes the time spent in traffic or while stopped at red lights or stop signs (refer to FLINT Corporate Policy for more details on distracted driving accordingly).

GPS units and GPS units on smart phones may only be used if factory installed or secured to the vehicle with a bracket that allows the driver to view the image without having to take their eyes off the road. Electronic devices shall be setup for operation prior to commencing driving activities.

Use of two-way radios for communication on radio-controlled roads, dispatching orders, or notifications (where applicable), or in the event of emergency communication is allowed.

15.0 PROJECT SPECIFIC SAFETY PLANS

FLINT requires each Project/Location to have a Specific Safety Plan. This plan is a consolidation of the safety standards necessary to safely execute work within the local safety requirements, client requirements and the inherent hazards of the project or facility. The Project Specific Safety Plan is to be developed by the Project Manager/General Manager in consultation with the functional HSE resource. As part of the project kick-off Project Specific Safety Plans will be reviewed and annually thereafter.

The Project Specific Safety Plan will address, as a minimum, the following:

- Company HSE Policy Statements
- Provincial Regulatory Agencies
- Responsibilities of Managers, Supervisors and Workers
- Orientation and Training
- Hazard Identification
- Personal Protective Equipment
- First Aid/Medical Services
- Incidents/Accident Investigations and Reporting
- Emergency Response Plan
- Drug and Alcohol Policy
- Respect in the Workplace
- Security
- Fire Protection

- W.H.M.I.S. 2015
- Environmental Action Plan
- Unique Job Requirements or Hazards:
 - Confined Space Entry/Restricted Space
 - Excavations
 - Tag out/Lock Out
 - Subcontractor Safety

16.0 MONTHLY REPORTING REQUIREMENTS

The purpose of a Standardized Monthly Reporting format is to ensure that all FLINT regions and projects/locations within each region are providing accurate information.

The HSE information that is collected by FLINT is analysed to determine trends or program deficiencies. As well, the availability of statistical information permits Safety Pre-Qualification information to be current.

17.0 SAFETY DATA MANAGEMENT

FLINT maintains a detailed electronic filing system which acts as a resource and records retention process for all employees to access through computers at any time.

All projects, facilities and FLINT work should maintain a hardcopy Safety (HSE) Filing system as follows:

1.16.1 General Safety

- 1.1 Project Safety Plan
- 1.2 Project Safety Plan Acknowledgement
- 1.3 Fall Protection Policy
- 1.4 Emergency Response Plans
- 1.5 Subcontractor Policies
- 1.6 Emergency Response Plans
- 1.7 Emergency Contact List (Client, Subcontractor)
- 1.8 Provincial Regulatory Authorizes Information
- 1.9 Joint Worksite Health and Safety Committee Information and Minutes
- 1.10 Practices/Procedures/Hazard Assessments

1.16.2 Orientation Acknowledgment

- 2.1 Orientation Checklist
- 2.2 Quizzes

1.16.3 Reports

- 3.1 Project/Facility Reports
- 3.2 Subcontractor Reports

1.16.4 Permits (as required)

- 4.1 Safe Work Permit-Prime Contractor
- 4.2 Client Specific Permit(s)

1.16.5 WHMIS - Safety Data Sheets (SDS)

- 5.1 WHMIS 2015 – Information
- 5.2 Safety Data Sheets (site inventory assessment – annual)

1.16.6 Equipment Inspections

- 6.1 Vehicle and Equipment Safety Inspections

1.16.7 Certifications

- 7.1 Cranes
- 7.2 Hoists
- 7.3 Chains
- 7.4 Personnel Baskets
- 7.5 Other lifting devices

1.16.8 Safety Meetings

- 8.1 Safety Committee (Joint Health and Safety Committee)
- 8.2 Shift Start/End Meetings and Action Logs
- 8.3 Safety Meetings including Subcontractor
- 8.4 Completed FLHA's and FLHA Quality Audits
- 8.5 Other

1.16.9 Inspections/Audits/Observations

- 9.1 Site Safety Inspections
- 9.2 Behaviour Observations
- 9.3 Audits and Action Plans

1.16.10 Security

- 10.1 Security Information

1.16.11 Environment

- 11.1 Environmental Management Plan

1.16.12 Investigations and Loss Reports

- 12.1 Incident Investigations
- 12.2 Loss Reports
- 12.3 Subcontractor Loss Reports
- 12.4 Near Miss Reports
- 12.5 Incident Management System
- 12.6 Workers' Compensation Board Files

1.16.13 Respiratory Program

- 13.1 Code of Practice
- 13.2 Training Records
- 13.3 Fit Tests

1.16.14 Training

- 14.1 Incident Investigation
- 14.2 Aerial Work Platform
- 14.3 Behaviour Based Safety
- 14.4 Confined Space Entry
- 14.5 Drug and Alcohol
- 14.6 Supervisor Training
- 14.7 Excavation/Trenching
- 14.8 Fall Protection
- 14.9 Fire Extinguisher
- 14.10 Lock Out/Tag Out
- 14.11 Field Level Hazard Assessment (FLHA)
- 14.12 Project Specific Safety Plan
- 14.13 Disability Management
- 14.14 WHMIS 2015

14.15 Competency Based Training and Assessment

14.16 Project/Position Specific Training

1.16.15 Subcontractor Information

15.1 Subcontractor SMS

15.2 Employee Safety training certification and records

18.0 SUBCONTRACTOR MANAGEMENT

FLINT strongly believes that to have the safest work sites possible, all involved companies must be equally committed to safety. FLINT is committed to utilizing only those sub-contractors who also share and display a genuine, pro-active, preventive attitude towards safety.

To verify this commitment, FLINT sub-contractors must meet the following minimum requirements before being allowed to work. FLINT subscribes to ComplyWorks and qualifies all subcontractors through this program. In the event a subcontractor does not have a ComplyWorks subscription, the HSE department will review the information submitted and determine if the sub-contractor is at an acceptable level of risk. If the risk is seen as high, either the sub-contractor will not be allowed to work for us, or a direct supervision plan will be put into place. Depending on the scope of the work, a risk management plan may also be required.

Exceptions would include a sub-contractor providing a onetime specialized service who cannot provide all the information. At a minimum, they must meet the insurance and WCB requirements, and achieve a negative drug and alcohol test result (if testing is required by the clients). Lastly be directly supervised by FLINT and follow FLINT's HSE policies and procedures.

If a subcontractor requires assistance to meet a required safety expectation not included in their safety program FLINT will use the direct supervision plan to assist the subcontractor to meet the requirements.

2.0 RESPONSIBILITIES

FLINT believes that all occupational injury, illness, and property damage is preventable, and through proactive management of risk, we can eliminate injury and loss from our company.

2.1 SAFETY GOALS AND OBJECTIVES

Achievable goals and objectives, based on previous performance and expected outcomes, will be set by FLINT to provide a focus for, and a measure of, the proactive safety efforts of all our personnel. These goals and objectives will address incident frequency and severity, levels of training, internal audit scoring, and improved disability claims management. These objectives must include injury reduction strategies and activities that focus on the ultimate goal of zero injury incidents.

FLINT sets specific, measurable, attainable, responsibility (driven), timely goals and objectives using the SMART principle. These goals and objectives are set corporately and senior management reviews them annually. Goals and Objectives are presented in the Operational Safety Excellence Plan available on ClearNet.

Performance expectations and measurement must also include a measure of the proactive safety performance in the Manager and Supervisor's area of responsibility. Specific timetables for action items are set and regular reviews of objectives will be conducted.

2.2 LEADERSHIP & ADMINISTRATION

Effective management of Occupational Health and Safety concerns, issues, and compliance must be driven by Senior Management, and is critical to the success of the Health, Safety, and Environmental Management System. Occupational Health and Safety is a responsibility shared by senior management, Joint Health and Safety committee members, line management, employees, customers, third party owners, essentially all personnel present at the work site.

2.3 POSITION DESCRIPTIONS

The following position descriptions are used in the Safety Management System but not inclusive of all roles in the company.

BUSINESS MANAGEMENT

- CEO
- COO
- Vice President
- Director
- General Manager
- Area Manager
- District Manager

HEALTH, SAFETY & ENVIRONMENT DEPARTMENT

- Director HSE Manager
- Sr. HSE Manager
- HSE Manager
- HSE Lead
- HSE Advisor

LINE MANAGEMENT

- Operation Manager
- Construction Manager
- Project Manager
- Area Quality Manager
- Supervisor
- Superintendent
- General Foreman

- Site or Shop Foreman
- Functional Management

EMPLOYEE

- Field Employee
- Office Employee

CONTRACTOR

- Direct Service Providers
- Suppliers

VISITOR

- Quality Assurance Inspector
- Regulatory Officials
- Audit personnel
- Client personnel

2.4 CORPORATE RESPONSIBILITY

A solid and dynamic Health, Safety and Environmental Management System assigns responsibility for continuous management of health, safety, environmental issues to key resources or in some cases individuals within FLINT.

This internal responsibility forms the foundation for pro-active HSE management. “No work conducted in our company is worth getting injured for, nor is it acceptable to cause damage to the environment or property”.

ALL EMPLOYEES, AS A CONDITION OF EMPLOYMENT, MUST:

- Demonstrate a visible commitment to the prevention of workplace injury, illness and incidents
- Take reasonable care to protect the health and safety of themselves and other employees present at the work site, and cooperate for the purpose of protecting the health and safety of themselves and other employees in the workplace
- Participate in the investigation process with the intention of preventing similar occurrence’s
- Participate in the Return-to-Work process
- Support the FLINT Health, Safety and Environmental Management System by proactive involvement and cooperation
- Perform all work tasks and activities with safety in mind

BUSINESS MANAGEMENT MUST:

- Lead, direct and support the safety activities and initiatives within FLINT
- Maintain and implement a comprehensive, best-practice Health, Safety and Environmental Management System
- Plan, set and support health, safety and environment goals and objectives within FLINT
- Allocate appropriate resources to ensure that the safety of employees is protected at the worksite
- Include safety as a regular part of management meetings and discussions
- Assign delegation of authority during absence

HEALTH, SAFETY AND ENVIRONMENT PERSONNEL MUST:

- Lead, direct and support the safety activities and initiatives undertaken within FLINT.
- Assist management in the development, implementation, review and update of the FLINT Safety Management System.
- Monitor and evaluate the effectiveness of the FLINT Safety Management System.
- With Senior Management, identify and establish FLINT safety goals and objectives.
- Maintain and communicate current information relating to the safety performance of FLINT and compare that information to current trends and statistics in related industries.
- Identifying high risk areas of our business and develop and implement programs to decrease or eliminate risk in these areas.

LINE MANAGEMENT MUST:

- Lead, direct and support the safety activities within FLINT

- Know and understand the FLINT SMS, regulations, laws, and codes that apply to their area of responsibility and to ensure that their employees understand their responsibilities under the Safety Management System
- Ensure that the FLINT SMS is implemented in their area of responsibility
- Ensure that subcontractors hired to perform work on behalf of FLINT have an established minimum standard of safety in place, and adhere to the requirements set forth in their Health and Safety Management System, FLINT and/or client, whichever is the higher standard
- Participate in the inspection and evaluation of the Health, Safety and Environmental Management System in their area of responsibility on a regular basis
- Ensure and assist in audits and investigations are implemented in their key areas of responsibilities
- Ensure employees are available for safety (HSE) related training
- Ensure that corrective actions identified in inspections, Safety Management System audits or investigations are implemented and completed in their area of authority
- Assign delegation of authority during absence

SUPERVISORS MUST:

- Ensure all requirements under the FLINT Health and Safety Management System are followed and adhered to on the work sites under their control
- Lead, direct, and instruct employees and sub-contractors in the safe performance of their duties. Where necessary, coach and mentor new employees and subcontractors as well as existing employees in new or re-assigned tasks
- Ensure those employees under their supervision work safely and follow the requirements of the FLINT Health, Safety and Environmental Management System as well as all applicable Government and customer requirements
- Provide safe working conditions for all employees and visitors to the work site
- Where requested, provide technical assistance and knowledge for the development, review and update of the FLINT Health, Safety and Environmental Management System as well as Safe Work Practices and Procedures
- Assign delegation of authority during absence

SUBCONTRACTORS MUST:

- Adhere to the intent of the FLINT SMS, and carry out their work in a manner that will protect the health and safety of their employees and the employees of FLINT

VISITORS MUST:

- Report to site office and/or site management upon arrival
- Follow the instructions of the site supervisor or designate or be escorted by authorized personnel
- Wear personal protective equipment when required
- Never walk about a work site unescorted

2.5 LEGISLATION

FLINT performs work in different provinces and must meet the requirements of the Provincial or Federal Occupational Health and Safety Legislation or Act specific to the province in which we are working. Responsibilities are required for FLINT, management, supervision, and workers and are described in the Act as duties or obligations.

It is imperative that as far as it is reasonably practicable to do so management and supervision protect the health and safety of workers engaged in work activities. It is equally important that workers take reasonable care to protect the health and safety of themselves and other workers while performing work.

2.6 PRIME CONTRACTOR MULTIPLE OBLIGATIONS

FLINT in applicable situations, where company employees are acting as the prime contractor, and consistent with the Provincial OH&S Act at a worksite, recognizes its responsibility to ensure, where reasonably practicable, that every employer and every worker at the worksite complies with all applicable health and safety legislation.

It is understood that jurisdiction specifics (Ex. provincial/federal) requirements may vary somewhat but overall, a prime contractor at the worksite, either defined, or contractual obligated has established standards of care for protection of all workers on site.

Regulatory Definition Reference – Provincial OH&S Act & Regulations

Worksite	A location where a worker is, or is likely to be, engaged in any occupation. The term worksite includes any vehicle or mobile equipment used by a worker in an occupation.
Prime Contractor	When two or more employers are involved in work at a worksite at the same time, the one designated as prime contractor directs the other employers and contractors and is responsible for taking steps to protect the workers from harm.

2.7 EXISTENCE OF DANGER – OBLIGATION TO REFUSE UNSAFE WORK

Consistent with the Provincial OH&S Act all workers (employee, contractors) at FLINT are obligated to refuse unsafe work where they believe there is danger to their health and/or safety.

Definition Reference – Provincial OH&S Act & Regulations

Dangerous Work	Any hazard, condition or activity that could reasonably be expected to be an imminent or serious threat to the life or health of a person exposed to it before the hazard or condition can be corrected or the activity altered
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Personnel refusing, and then reporting, unsafe work, (consistent with the OH&S Act(s)), to FLINT will not be dismissed or disciplined. Employees will report the refusal to their supervisor and then complete Form 2A Refuse Unsafe Work Report. Supervision shall follow the same process for incident reporting as documented in Element 15 Incident Investigation and Claims.

2.8 OFFENCES

FLINT employees at all levels of the organization can be subject to fines and possible imprisonment where it has been determined they failed to comply with the applicable Provincial OH&S Act, Regulation or adopted Code under provincial or federal jurisdiction.

A person who contravenes the OH&S Act(s), Regulation(s), or adopted Code(s) or fails to comply with a regulatory order is guilty of an offence and liable.

Additional Federal legislation under Bill C45 and Section 217.1 of the Criminal Code created rules establishing criminal liability to organizations for acts of their representatives, and a legal duty for all persons “directing the work of others” to take reasonable steps to ensure the safety of workers and the public.

2.9 MANAGEMENT, SUPERVISION, SPAN OF CONTROL, MENTORSHIP RATIOS

Optimizing for managerial span requires an understanding of the complexity and the nature of the work done by both the manager and their direct reports. FLINT have categorized the positions increasing the effectiveness, efficiency, speed, and productivity of the entire organization into six different FLINT positions:

Vice President

The Vice President does a large amount of individual work and are responsible for situations where there are often no clear guidelines,

- Managerial span for a Vice President is eight to ten direct reports
- Assign delegation of authority during absence

Area Manager

The Area Manager does a large amount of individual work and are responsible for situations where there are often clear guidelines and functional structure,

- Managerial span for an Area Manager is five to eight direct reports
- Assign delegation of authority during absence

District Manager

The District Manager is responsible for assisting in the development and implementation of the standards, policies, and business guidelines on assigned construction or maintenance projects or facilities.

- Managerial span for a District Manager is three to five direct reports
- Assign delegation of authority during absence

Project Manager

The Project Manager is responsible for assisting in the development and implementation of the Project Specific Safety Plan (PSSP), project execution, and quality assurance on assigned construction or maintenance projects or facilities.

- Managerial span for a Project Manager is two to three direct reports
- Assign delegation of authority during absence

Area HSE

The Area HSE is responsible for defining and monitoring Health, Safety, and Environment policies, practices and procedures for all company activities.

- Managerial span for a HSE Lead is two to three direct reports
- One HSE Resource should be engaged when workforce exceeds 25 persons
- Two HSE Resources should be engaged when the workforce exceeds 50 persons
- One HSE Lead and Two HSE Resources should be engaged when the workforce exceeds 100 persons
- As numbers exceed 100 additional HSE Resources must be added per ratio.
- HSE Lead must assign delegation of authority during absence

Area Quality

The Area Quality is responsible for defining and monitoring Quality policies, practices, and procedures for all company activities.

- Managerial span for a Quality Lead is two to three direct reports
- One Quality Lead should be engaged when pressure equipment and/or structural workforce exceeds 35 persons
- One Quality Inspector should be engaged when the pressure equipment and/or structural workforce exceeds 10 persons
- Quality Lead must assign delegation of authority during absence

Superintendent

The Superintendent is responsible for implementing the Project/Location specific execution and safety plan with the assistance of the management team and the HSE resource.

- Managerial span for a Superintendent is three to five direct reports
- Assign delegation of authority during absence

Foreman/Supervisor

The Foreman is responsible for environmental, safety awareness, quality, and task performance of the workers.

- Managerial span for a Foreman is five to ten direct reports
- Assign delegation of authority during absence

MENTORSHIP

Mentor to a Mentee - (SSW Short Service Workers – New to FLINT – Direct Service Providers – DSP) ratios should be 1:1. However, during Turnarounds these ratios may not be met due to the majority of the workforce being in the SSW program. The following additional detail applies to contracted services to a Client and Prime Contractor work directed by FLINT. **The follow ratio proposed below are set as a guideline** – each activity is unique and **may not allow** for actual ratios being achieved due to available supervision – foreman – lead hands actively on site.

Key mentorship documentation completed for a specific worker shall be forward to the Safety Passport Team for upload into worker training and competency file.

Definitions

Mentor

- Designated supervisor, minimum 5 years in supervisory role, journeyman ticketed where applicable trained per company criteria.

Mentee – New Worker

- Identified new green worker = new to industry (oil gas/forestry/manufacturing or New to FLINT).

Mentor to a Mentee - (SSW Short Service Workers – New to FLINT – Direct Service Providers – DSP) ratios should be 1:1. However, during Turnarounds these ratios may not be met due to the majority of the workforce being in the SSW program. The following additional detail applies to contracted services to a Client and Prime Contractor work directed by FLINT. The follow ratio proposed below are set as a guideline – each activity is unique and may not allow for actual ratios being achieved due to available supervision – foreman – lead hands actively on site.

Key mentorship documentation completed for a specific worker shall be forward to the Safety Passport Team for upload into worker training and competency file.

PROTOCOL

For mentor to mentee ratio of supervision to workers reference the details below:

Supervision / Management will:

- Assign a mentor to the new worker (documented)
- Ensure key documentation on training and development is initiated and maintained throughout the mentoring process
- Assign key training and competency as required for position and role
- Utilize Safety Passport for direct competency assessment, verification and sign off, for the worker
- Transition worker, sign off to a Trained and Competent status
- DEVIATIONS to the ratio guidelines below require a documents deviation approved by District Manager

FULL TIME (PERMANENT) WORKER

WORKER TYPE	MENTOR TO MENTEE RATIOS
Permanent worker New to FLINT	1:1 (1 mentor to 1 new worker) MAXIMUM 1:3 above - Deviation and approval required District Manager or designate
Permanent Apprentice workers	1:3 - 1 Ticketed Journeyman to 3 apprentices (ex. electrical – millwright – pipefitter – heavy duty mechanic, over 4 years in trade scaffolding). MAXIMUM 1:3 above – Deviation and approval required District Manager or designate
Permanent worker Veterans	1:7 ... [1 mentor supervisor – 7 labourers, journeyman craft, skilled labour, operators, equipment operators] MAXIMUM 1:10 or above - Deviation and approval required District Manager or designate

TURNAROUNDS/PROJECT WORK/PLANNED OR UNPLANNED FACILITY OUTAGES

The follow ratio proposed below are set as a guideline – each activity is unique and may not allow for actual ratios being achieved due to available supervision – foreman – lead hands actively on site.

- Direct supervision at all times required at point of task by the Mentor
- Entire crew working on a task **MUST not** all be apprentices.

WORKER TYPE	MENTOR TO MENTEE RATIOS
Heavy Equipment Operator – Suncor (Fort McMurray)	1: 20 ... [1 Supervisor Crew Shifter: 20 operators] MAXIMUM 1:20 above - Deviation and approval required District Manager or designate
Veteran craft (Ticketed Journeyman = + 4 years in trade – new to FLINT workers, operators)	1:7 ... [1 mentor – to 7 ticketed craft, operators, equipment operators] MAXIMUM 1:10 or above - Deviation and approval required District Manager or designate
Apprentice workers	1:3 ... [1 Mentor - Journeyman to 3 apprentices] MAXIMUM 1:3 above Deviation and approval required District Manager or designate
Laborers – New to FLINT	1:7 ... [1 mentor supervisor – 7 labourers] MAXIMUM 1:10 above Deviation approval required District Manager or designate
Direct Service Providers– DSP – Sub Contractors	1:7 ... [1 mentor supervisor – 7 DSP's] MAXIMUM 1:10 above Deviation approval required District Manager or designate

2.10 MANAGEMENT, SUPERVISION, JOURNEYMAN AND CONTRACTOR RESPONSIBILITIES

Vice President

The Vice President is responsible for the consistent implementation of the FLINT overall health, safety and environment program in the areas of their responsibility (hereafter known as HSE program).

Responsibilities include (but are not limited to):

- Ensuring FLINT safety culture is integrated in each Project/Location
- Providing manpower and resources to maintain an effective HSE program
- Assigning HSE responsibilities to alternate staff when staff positions are not designated as described in the FLINT HSE Safety Management System Manual
- Monitoring and evaluating FLINT HSE program performance through meetings, monthly reports, inspections and periodic reviews of safety specific programs
- Taking action to correct unsatisfactory environmental and safety performance
- Recognizing and positively reinforcing acceptable levels of environmental and safety performance
- Implementing HSE education and training programs which are appropriate to ongoing needs
- Communicate potential recordable injury to COO within one (1) hour of occurrence
- Responding to media inquiries
- Setting the right example – Walk the Talk when it comes to Safety

Area Manager

Responsibilities include (but are not limited to):

- Ensuring FLINT safety culture is integrated in each Project/Location
- Monitoring and evaluating FLINT HSE program performance through meetings, monthly reports, inspections and periodic reviews of safety specific programs
- Taking action to correct unsatisfactory environmental and safety performance
- Recognizing and positively reinforcing acceptable levels of environmental and safety performance
- Setting the right example – Walk the Talk when it comes to Safety
- Supporting an effective and active health, safety and environmental program
- Ensuring that FLINT operations managers, supervisors, employees, and subcontractors are trained and competent, and that they abide by all company policies, procedures and government legislation
- Providing resources to ensure that personal protective and safety equipment is available and maintained for all employees
- Encouraging employee involvement in safety by demonstrating a personal commitment to safety, and by being open to all suggestions

- Ensuring that company policies and work procedures comply with all government legislation and the requirements of the contracting company
- Ensuring that all incidents are thoroughly investigated and reported, and that remedial actions are undertaken to eliminate any reoccurrence actively participating in company-wide safety communications, meetings, and site visits
- Supporting and following up on a workers' obligation to refuse unsafe work and report imminent dangers
- Communicating annually to all employees, contractors, and subcontractors the company's commitment to health and safety, and to improving workplace health and the company's safety culture
- Participating in and working with all regulatory agencies, when required

Project or District Manager

The Project or District Manager is responsible for assisting in the development and implementation of the Project Specific Safety Plan (PSSP) on assigned construction or maintenance projects or facilities.

Responsibilities include (but are not limited to):

- Leading and Initiating development and implementation of the health, safety and environment program requirements
- Conducting periodic checks to assess compliance with FLINT' HSE standards
- Reviewing accident/incident reports for correctness and completeness
- Taking immediate action to correct unsatisfactory environmental or safety performance or conditions
- Complying with building codes, as to construction means and methods, regulations and project specifications
- Writing environment, safety and loss prevention requirements into subcontracts
- Obtaining approval from engineering and safety personnel prior to commencing special activities (e.g., heavy lifts, crane man-lifts and confined space entry)
- Reviewing environmental and safety performance through personal observations and inspections
- Reviewing inspection reports and confirming that corrective action has been completed
- Confirming that incident investigations have been completed and properly documented
- Initiating action to correct unsatisfactory environmental or safety performance
- Setting the right example – walk the talk when it comes to safety

Area HSE Lead

The Area HSE Lead is responsible for defining and monitoring Health, Safety, and Environment policies, practices and procedures for all company activities.

Responsibilities include (but are not limited to):

- Ensuring FLINT safety culture is integrated
- Providing information to all personnel on environmental and safety legislation standards and regulations
- Conducting and documenting regular Project/Location inspections and behaviour observations
- Evaluating inspection reports to identify unsatisfactory performance trends
- Liaison with the Director of HSE, Sr, HSE Manager, and HSE Manager on related issues
- Assisting in the project planning process, including preparing the project/location specific safety plans in collaboration with the District Manager, Project Manager, client and subcontractors as required
- Researching, evaluating and selecting medical facilities to accommodate project/location requirements
- Preparing safety performance statistics and circulating to line management
- Reviewing minutes of safety meetings to verify that meaningful information is being provided to workers
- Identifying (through the inspection process) any environmental and safety deficiencies and initiating corrective measures
- Issuing and circulating environmental/safety literature to enhance and maintain awareness
- Assisting in the organizing, planning and implementation of the worker safety orientation program and the Field Level Hazard Assessment program (FLHA)
- Reviewing and organizing environmental and safety education and training programs, in consultation with the Director of HSE
- Support Field Injury reports and forwarding copies to the HSE Program Coordinator/WCB Administrator within 24

hours of initial report

- Monitor and support investigation reports, environmental incident reports, medical or first aid cases and reports of damage to property or equipment to verify that corrective action has been completed
- Assisting in the investigation of potentially serious incidents and accidents and recommending corrective action to prevent reoccurrence
- Notifying government agencies of project starts, incidents or equipment failures in accordance with local and/or federal regulations (where applicable)
- Monitoring company owned or rented equipment safety maintenance programs
- Actively participating in appropriate environment and safety associations (Ex. ACSA)
- Setting the right example – walk the talk when it comes to safety

Area Quality Manager

The Area Quality is responsible for defining and monitoring Quality policies, practices and procedures for all company activities.

Responsibilities include (but are not limited to):

- Take a lead role during the project initiation phase to clarify and advise on Quality requirements
- Functionally support Quality personnel and monitor performance of Quality team members
- Ensure quality standards and Inspections at shops and/or project sites are met in accordance with company policy, applicable codes and standards, and client specifications
- Take a client-centric approach to all work activities; this includes developing a strong understanding of multiple Clients' Quality requirements, building a personal rapport with Client representatives and frequent visits to Project sites throughout the districts
- Monitor and audit the overall progress and performance of each project as it relates to Quality and provide feedback for areas of improvement
- Initiate the non-conformance process when materials, services or products do not meet the required specifications, and resolve the issues. Initiate corrective actions within the timeframe as defined in the contract documents
- Work with project managers to develop a budget for the Quality component of projects. Work directly with and audit subcontractors and material suppliers to ensure compliance
- Evaluating inspections reports to identify unsatisfactory performance trends
- Liaison with the Director of Quality on related issues

Superintendent

The Superintendent is responsible for implementing the Project/ Location specific safety plan with the assistance of the management team and the HSE Manager.

Responsibilities include (but are not limited to):

- Assisting with the safety orientation program for new personnel
- Directing and monitoring Foremen in maintaining compliance with the Project/ Location Site Specific Safety Plan
- Monitoring the site for hazards or unsafe working conditions through personal observations
- Directing Foremen to take prompt corrective action to stop unsafe acts and eliminate unsafe or healthy conditions
- Reviewing project inspections and implementing corrective measures
- Reviewing the Field Injury Reports and other reports for accuracy and action as required
- Investigating and documenting environmental/safety incidents and/or accidents. Taking corrective action to prevent recurrence
- Conducting safety meetings
- Participating in safety inspections and behaviour observations
- Implementing an emergency response program
- Verifying that all company vehicles and equipment are maintained within safe operating conditions
- Reviewing equipment incident reports and initiating investigation and documentation procedures
- Setting the right example – walk the talk when it comes to safety

Foreman

The Foreman is responsible for promoting environmental/safety awareness and demonstrating to the workers, through day-to-day example and actions, that environmental and safety compliance is a top priority of FLINT.

Responsibilities include (but are not limited to):

- Conducting task specific environmental and safety orientations for new workers prior to assignment of duties, including hazardous product instruction
- Implementing/monitoring the requirements of the Project/Location Specific Safety Plan
- Providing FLHA development assistance to workers whenever new tasks are assigned
- Issuing appropriate personal protective equipment to workers as required
- Developing and maintaining good housekeeping standards
- Monitoring through personal observation for non-compliance or unsafe conditions/hazards and communicating these (with remedial action as required) to appropriate line supervisors or workers
- Conducting a preliminary investigation upon the report of an incident or accident
- Reporting results of incident or accident to the superintendent
- Holding FLHA and weekly safety meetings with workers
- Verifying that operators are qualified, fit, and authorized to operate equipment or vehicles safely
- Taking immediate action to correct unsatisfactory environmental/safety performance
- Setting the right example – walk the talk when it comes to safety

Worker

Responsibilities include (but are not limited to):

- Familiarize themselves and complying with all general health, safety and environmental rules
- Familiarize (read & understand) themselves and complying with the Project/Location Specific Safety Plan
- Participate in safety meetings and other related meetings
- Maintain good housekeeping in their work areas
- Reporting unsafe acts and conditions to their foremen/supervisor
- Report personal injuries, no matter how minor, and obtaining medical attention as required
- Cooperate with, or participating in, environmental and safety incident investigations as required
- Wear adequate personal protective safety equipment
- Attend safety orientation meeting.
- Participate in the Field Level Hazard Assessment program
- Setting the right example – walk the talk when it comes to safety

Subcontractor

Subcontractors on jobsites are responsible for the safety of their workers.

Responsibilities include (but are not limited to):

- Complying with applicable environment and safety legislation
- Complying with the FLINT Project/Location Specific Safety Plan
- Attending a worker safety orientation providing Field Level Hazard Assessment to workers whenever new tasks are assigned or when job conditions change
- Contacting the FLINT Supervision prior to commencing work for instructions including environmental and safety hazards
- Reviewing the safety plan with their crew and verifying compliance through personal observation
- Providing education, training and enforcing the use of the applicable protective equipment
- Reporting and investigating all incidents
- Making arrangements with FLINT Supervision concerning emergency procedures
- Immediately correcting any unsafe conditions or acts observed in their jurisdiction
- Immediately reporting any unsafe acts and conditions observed outside of their jurisdiction
- Contacting the applicable FLINT supervisor or manager if they have any doubt regarding the meaning or interpretation of the safety plan
- Holding safety meetings with their workers, documenting the meeting and submitting a copy of the minutes to

FLINT Supervision

- Maintaining good housekeeping in their work areas
- Setting the right example – walk the talk when it comes to safety

Visitors, Suppliers and Consultants

Visitors, suppliers, and consultants are responsible for safeguarding their own health and safety. Responsibilities include (but not limited to):

- Reporting to the office before entry
- Participating and complying with environmental and safety directives
- Complying (read and sign off) with the safety plan
- Wearing required personal protective equipment
- Reporting any unsafe acts and or unsafe conditions to FLINT
- Reporting any injury or incident
- Setting the right example – walk the talk when it comes to safety

3.0 EMERGENCY PREPAREDNESS AND EVACUATION PLAN

Even though every effort is taken to prevent incidents from occurring in our workplace, emergency response plans must be in place to address emergencies that occur at work. Emergencies can be work and non-work-related medical situations, fires, or natural disasters.

3.1 RESPONSIBILITIES

Manager

- Ensure that specific resources, including materials, equipment and training are in place to deal with expected emergencies at the workplace.

Supervisor

- Develop site-specific Emergency Response Plans, based on the Pre-Job Hazard Assessment. The Emergency Response Plans must be tested and updated when required.
- Ensure that employees understand the site-specific Emergency Response Plans and their roles in an emergency.

Employees

- Understand the Emergency Response Plan for their work area.
- Participate in the development and implementation of Emergency Response Plans for their work area, when requested.
- Participate in emergency response training and testing of the Emergency Response Plan.

3.1.1 EMERGENCY RESPONSE CONTACT LIST

FLINT Management and Supervision

Person and Role	Number
Barry Card – CEO	1 (587) 917-5436
Neil Wotton – COO	1 (403) 992-5644
Jennifer Stubbs – CFO	1 (403) 519-9700
Renee Linssen – Director HSE	1 (780) 402-5844
Michael Donnelly – Sr. HSE Manager	1 (587) 215-1384
Deloris Hetherington – VP of Human Resources	1 (403) 803-2782
Herb Thomas – VP FLINT	1 (780) 830-6094
Peter Strohmman – Operations Manager CWES	1 (250) 443-4545
Rob Farthing – VP FLINT Environmental Services	1 (403) 371-4329
Angela Thompson – VP Corporate Services	1 (403) 998-6133
Jelaney Derkach – Sr. HSE Program Coordinator & WCB Claim Manager	1 (780) 490-8679

Suggested provincial emergency services authorities are listed below and added to each Project Specific Safety Plan.

- Environment Pollution Control
- Forest Fires
- Poison Control
- STARTS Air Ambulance
- TDG Control Centre
- Workplace Health & Safety
- Workers Compensation
- Electrical Safety Authority (ON)

EMERGENCY AND/OR WORKSITE EVACUATION ROLES AND RESPONSIBILITIES

Firefighting, medical treatment, rescue, or other emergency response activities should only be performed by properly equipped and trained emergency responders. FLINT recognizes that some of its personnel have received training in first aid, cardiopulmonary resuscitation (CPR) and AED use, and may choose to perform these duties on injured personnel.

1. If situation requires and evacuation or emergency muster, an alarm will be initiated.
2. All personnel in the area requiring evacuation or muster will immediately exit the building and assemble at the designated Muster Point. (DO NOT use elevator)
3. The Fire Warden, Emergency Response Coordinator or designate will conduct a headcount to account for all personnel, including visitors.
4. The Fire Warden, Emergency Response Coordinator or designate will ensure the appropriate emergency response is activated.
5. Should it be determined that an individual is still within the hazard zone, establish whether a rescue can be safely attempted. Rescue will be conducted only if rescuers are properly trained, and a rescue attempt will not put another individual in jeopardy.
6. Personnel shall await further instruction from the Fire Warden, Emergency Response Coordinator or designate (i.e., all clear and re-entry or further evacuation).

During evacuation, Fire Warden, Emergency Response Coordinator or designate will complete a sweep of the office building. All rooms will be searched to confirm that no personnel remain in the building.

Emergency Response Coordinator

Emergency Response Coordinators during normal business operations or during an emergency will:

- Gather employee and visitor sign in sheets and proceed to designated muster point
- Contact emergency services and company contacts as required
- Await sweep reports from Fire Wardens
- Conduct roll call
- Arrange transportation of injured employees as required

Fire Warden

- Fire Wardens during normal business operations or during an emergency will:
- Conduct a sweep of assigned area
- Report to Emergency Response Coordinator key information
- Assist Emergency Response Coordinators as required

First Aid Attendant

First aid employees or attendants designated during normal business operations or during an emergency will:

- Provide first aid to employees and contractors as required.
- Report to Emergency Response Coordinator during any incident with key information about injured employees.
- Assist in arranging transportation of personnel in need of medical attention, as required.

Employees

Employees will:

- Assist and support all emergency responders, as directed by personnel in charge.

3.2 FIRST AID

FLINT will ensure that appropriate first aid services including trained employees, supplies and equipment are at each workplace (as required).

The number and qualifications required will vary depending on Occupational Health and Safety legislation and the hazards in the workplace. FLINT employees will be trained to the required provincial first aid level.

The manager will ensure that these standards are met for each project, job or permanent facility, before commencement of work.

All contracted First Aid service providers must be qualified in the jurisdiction they are working in and hold valid certification and appropriate WCB and liability insurance coverage.

3.3 FIRE PREVENTION

All FLINT work sites will have adequate fire protection available. Employees must be trained in the use of the fire extinguishers in their work area. Fire prevention must be included in regular workplace inspections.

Where computers are present, fire extinguishers must be of a type designed for use with electrical equipment.

3.3.1 Fire Extinguishers

Fire Extinguisher Operation

Use the **PASS** system:

- PULL** the pin.
- AIM** low, point at the base of the fire.
- SQUEEZE** the handle.
- SWEEP** from side to side keeping the extinguisher aimed at the base of the fire.

Fire Extinguisher Classes

- Class A – ordinary combustibles (e.g., wood, cloth, paper, rubber)
- Class B – flammable liquids (e.g., gasoline, oil, solvents, oil-based paints)
- Class C – energized electrical equipment (e.g., wiring, fuse boxes, appliances)
- Class D – combustible metals (e.g., magnesium)
- Fire extinguishers can be multipurpose (ABC).

Do not place yourself in danger if you do not have the knowledge and the proper training. Evacuate the area and contact emergency services immediately.

3.4 EMERGENCY RESPONSE PLANS

3.4.1 Permanent Facilities

All permanent FLINT work sites must have an Emergency Response Plan based on an annual site Hazard Assessment that addresses or includes, at a minimum:

- Fire
- Medical Emergency
- Emergency Contacts
- Spills, leaks and release of hazardous materials
- Natural Disasters

All permanent FLINT work sites must have posted a site/facility map showing:

- First Aid Kit Locations
- First Aiders
- Fire Extinguisher Locations
- Evacuation Routes and Muster Points
- Controlled Product Storage

Emergency Response Plans for permanent facilities will be reviewed on an annual basis.

3.5 PROJECT EMERGENCY RESPONSE PLANS

- All FLINT work sites must have an Emergency Response Plan based on a Site Hazard Assessment that addresses or includes, but is not limited to:
 - Fire/Wildfire
 - Medical Emergency
 - Spills, leaks, and release of hazardous materials
 - Natural disasters
 - A Pre-Job Hazard Assessment, including (where applicable):
 - Confined space entry
 - High-angle Rescue
 - Trench Rescue
 - Water Rescue
- Site map showing:
 - Evacuation routes
 - Nearest medical facility and how to get there (i.e.: roads, highway numbers and approximate distance in kilometres)
 - Travel Routes
 - Muster Points
 - Helicopter Landing Areas (as required)
- Emergency Contact List including:
 - FLINT Supervision and Management
 - Project Management Contacts
 - Client Contacts
 - Occupational Health, Safety and Environment Department Contacts
 - Government Agencies (Alberta Environment, Dangerous Goods)
 - Medical Transportation Services (land and air)
 - Means of communication and testing of communication (cell phone / two-way radio)

- First Aiders/Services

All Emergency Response Plans and critical documentation must be conspicuously posted in the workplace and communicated to all employees present at the work site.

3.6 CAMP LOCATIONS

All FLINT residential camps (where applicable) must have an Emergency Response Plan based on a site Hazard Assessment.

The project/operation manager must ensure that an Emergency Response Plan is complete before employees of FLINT move into a camp facility.

This Emergency Response Plan must include or address:

- Camp Policy and Rules
- Fire/Wildfire
- Spills, leaks, and release of hazardous materials
- Natural Disasters
- Medical Emergency

The Emergency Response Plan must contain a map posted in all rooms showing:

- Evacuation Routes and muster points
- First Aid Kit Locations
- Fire Extinguisher Locations
- Emergency Contact Information

All camps, whether owned or contracted, must be equipped with Carbon Monoxide Detection and Alarm devices.

3.7 EMERGENCY RESPONSE PLAN TESTING

All emergency response plans must be tested annually to ensure effectiveness of the plan. ER tests/drills must be documented, with changes made to the plan as may be required. This test must include a muster/head count of employees present at site, test of detection equipment and/or alarm systems or devices. To prevent confusion and potential to cause a dangerous situation, the intention to complete an ER test/drill on a client site must be communicated to client representatives prior to conducting the test/drill.

3.8 EMERGENCY RESPONSE GENERAL REQUIREMENTS

Reaction to an emergency will vary with the nature and severity of the emergency. Emergency response should include (but not limited to):

- Accounting for all employees present at the work site
- Appropriate treatment of the injured or ill
- Prompt notification of authorities and management of FLINT

3.8.1 Emergency Response Drills & Training

FLINT will ensure workers designated to provide rescue or evacuation services receive emergency response training appropriate to the worksite and any hazards likely to be encountered.

The training must include **simulated exercises (Drills)** appropriate to the types of emergencies reasonably likely to occur at the worksite.

The training must be **repeated** at intervals necessary to ensure that designated rescue and evacuation workers remain competent to carry out their duties, at **minimum once annually**.

FLINT will provide all equipment and PPE required for appropriate emergency response.

Emergency Response drills are to be conducted and documented on an annual basis.

Any corrective action resulting from the drills or exercises will be documented, the plan will be updated as required, and changes will be communicated to all personnel.

The FLINT Emergency Response and Evacuation Plan will be updated as changes occur and will be reviewed annually to ensure accuracy.

3.8.2 Emergency Reporting

IN THE EVENT OF EMERGENCY

- Remain calm
- Phone Emergency Services (911 or client site emergency number)
 - State who is calling
 - State what type of emergency you have ... injury, fatality, vehicle, fire, violence
 - State the exact location of the emergency
- Provide other pertinent information
- Remain on the phone line (where applicable) to assist emergency services as required
- Station someone on the nearest main road to direct emergency crews
- Keep area clear for emergency crews to enter

Whenever an injury incident or fire occurs, outside assistance may be required from the local police, ambulance or fire departments. It is imperative that all personnel know where the nearest means of communication is located for quick access.

3.8.3 Evacuation Plan

Transportation

In case of an emergency that requires evacuation, all employees will be transported from the designated safe area via emergency conveyance or other suitable transportation to the temporary holding location (emergency lodging), or to a designated temporary lodging location.

Temporary Holding and Emergency Lodging Location (where applicable)

Based on direction from either, the client or provincial emergency services, personnel temporary holding area will be at the designated location. Employees will remain at the designated location until appropriate notification is received from the transportation coordinator or the on-site commander and it is deemed safe to re-enter the area or return to work, or that a long-term holding or lodging location has been established.

Re-Entry/Return to Work

An assessment and/or investigation by the appropriate people (ex. client representatives/provincial authorities) will be completed following the emergency or evacuation to ensure the safety and security of FLINT employees and the public. To keep personnel safe and to protect property and the environment, the appropriate people will establish when re-entry and return to work is possible.

Notification of Re-Entry/Return to Work

All evacuated employees will be notified by their direct supervisor when they can re-enter the location and return to work.

Communication

Communications with the emergency location will be strictly controlled. The on-scene personnel will spend their time and efforts dealing with the emergency. Local management and upper management will keep all locations up to date with information about the situation and will forward any information deemed necessary.

Media

All communications with the media will be directed to the FLINT VP of Corporate Services or designate.

FLINT will assist the media by providing relevant honest and prompt answers to questions within the bounds of reason, practicality, and safety. Proper handling of media inquiries is very important.

Under no circumstances are media personnel permitted into controlled areas. Employees of FLINT in answer to media inquiries should direct those inquiries to the senior FLINT employee on site.

3.8.4 Security

Project and facility security prevents loss caused by arson, theft or vandalism and affects the ability of FLINT to maintain maximum effectiveness in its HSE Management System.

Like safety, security is everyone's responsibility. To assist in the planning and organizing of security considerations, has been included at the end of this section.

The FLINT security program includes:

- Public access and control
- Employee access
- Tool, equipment, and material control
- Security staff
- Electronic security
- Hazards presented by adjacent properties

3.8.4.1 Public Access and Control

When planning public access and control, the project/facility location is the major determining factor. If the project/facility is located in a known high-crime area, a more sophisticated system will be required. Public access and control may include the use of fencing, hoarding, gates, signs, lighting, visitor registration and security patrol.

- The use of fencing and hoarding is intended to prevent public access. The purpose of fencing or hoarding is two-fold, to keep unwanted people off the site and to keep materials and equipment inside the site. In some cases, there are applicable municipal government regulations to follow. In all circumstances, FLINT security must be considered.
- Every project/facility that is fenced or hoarded shall have an identifiable entrance location. The office should be located at or very near the main gate and display adequate signage to direct people and traffic. Secondary access gates should be kept locked at all times and opened only when required for specific deliveries or other authorized entries.
- Signage shall be used to direct all workers and visitors are important, for muster point, controlled area, vehicle parking, and laydown areas where applicable.
- All visitors must report to the project/facility office. On projects/facilities without formal security staff, the proper use of company signs can assist supervisory staff in controlling visitors.

- All visitors of a FLINT site must be, at minimum, orientated to the safety requirements on location, and key elements under the SMS (refer to Training Section).
- Subcontractors that return to the location after hours or on weekends must be authorized by the FLINT Management. Where security staff is employed, construction personnel must register with the security staff when returning to work after hours.
- Projects shall be adequately lit with night-lights on lower floors, storage areas and trailers. This is a deterrent to theft, mischief or arson and provides sufficient lighting for a safe work environment.

3.8.4.2 Employee Access

- Parking - It is recommended that employee vehicles do not park onsite.
- Vehicle Permits - Only authorized vehicles should be allowed on site. Security staff or supervisory personnel shall control vehicle entry. Anyone bringing a vehicle on site must be made aware that a vehicle leaving the site can be subject to search.

3.8.4.3 Tool and Equipment Control

- Supervisors are responsible for control of tools and equipment issued to their crews. Tools and equipment used on a long-term basis by crews can be stored in crew gang boxes or tool storage trailers. Each Supervisor must conduct inventories on a regular basis with the deficiencies reported to FLINT Management
- Responsibility for control and record keeping of tools and equipment can vary depending on the size of the project/facility. On larger projects/facilities, a full-time tool crib attendant can be allocated; however, on smaller projects a part-time worker can be assigned this responsibility.
- Company tools and equipment (including cords, hoses, and cables) must be clearly marked and identified with company name.
- Mobile equipment parking shall be arranged so that the equipment cannot be tampered with or inadvertently started. Ignition keys must not be left with the equipment.
- Components of equipment that can be dismantled should be stored separately. For example, acetylene gauges and hoses should be separated from their bottles and welding cables should be separated from their generator.
- Fuel and maintenance supplies such as gas, oil and grease must be secured to prevent unauthorized use or theft. These must also be stored in a safe manner away from consumable supplies and permanent equipment.

3.8.4.4 Shipping, Receiving and Material Control

Each project/facility must have a specific person or persons made responsible for receiving and shipping materials and equipment (refer to applicable safe work practice).

The shipper/receiver delegate should be located near the main entrance. Careful checks of shipments must be carried out in all cases to immediately detect shortages or damage.

The shipper/receiver must be aware of FLINT procedure for shipping, receiving and control of packing slips. Beware of the following inadequacies:

- Partial shipment

- Damaged shipment
- Inaccurate packing slip
- Inaccurate listings of shipments from the project returned to equipment or material suppliers.

3.8.4.5 Key Control

A designated staff person must be responsible for key control. Keys that access general areas should only be issued to supervisors. An inventory and signature system must be set up to control keys (including vehicle and equipment keys). Spare keys should be locked in a tamper-proof container. When a key is lost, locks should be changed. The use of a master key system is not recommended as it provides minimum security.

3.8.4.6 Security Staff

The use of direct-hire watchmen in some districts (i.e., off-duty policemen) with a construction background is effective. The watchmen should be hired on site and report to the Supervisor who is responsible for security. Security services provided by some private security firms may not meet the minimum standards required by FLINT. Formally published and distributed duties for security staff is required on applicable FLINT sites.

3.9 Emergency Response Practices and Procedures

3.9.1 Emergency Response Tools/Supplies and Equipment (on-hand)

FLINT Units (NSC registered):

- Type 2 first aid kits
- Fire Extinguishers
- Copies of emergency procedures and emergency contact phone numbers
- Cell phone, radio, or IVM (In-Vehicle Monitoring)
- Additional equipment – may include self-contained breathing apparatus (SCBA) and supplied air breathing apparatus (SABA)

Pickups

- FLINT trucks should contain the following items:
- High-visibility vest (jackets)
- Cell phone, radio, or IVM (In-Vehicle Monitoring)
- Type 2 First Aid Kit
- Emergency roadside equipment
- Fire Extinguisher

Facilities

FLINT Facilities should contain the following items:

- Type 3 first aid kits
- Eyewash stations near chemical hazards
- SCBA (where applicable)
- Chemical shower (where applicable)
- Fire Extinguishers
- Fire Blanket
- FLINT incident reporting and investigation kit
- Evacuation Maps/Route

3.9.2 Injury

3.9.2.1 **Minor Injury Emergency Response Practice**

Minor injuries are those not deemed to require professional medical attention (e.g., scrapes, bruising, cuts, irritations, slivers, first degree burns). The injured party should be able to return to work immediately.

The injured person shall:

- Immediately report to the supervisor/person trained in first aid.
- Apply first aid as needed and record supplies in the log.
- Fill out an incident report.

The responder shall:

- Help the injured person by applying first aid.
- Take preventative action if required, take the injured person for medical follow-up, and remain with the injured person until the he or she is cleared to return to work. Another qualified person may be designated for these actions.
- Follow the steps indicated in Element 15 Internal Incident Reporting and Timeline Process Flowchart for reporting the incident or emergency.
- Secure the scene as required for site control and incident investigation.

Assist in completing and verifying the incident report. If the injured worker is able to complete and verify the incident report, assist them in this. If the injured worker is not able to do this, the supervisor shall complete the Incident Report with the available HSE resource and issue it to management within 24 hours.

3.9.2.2 **Major Injury Emergency Response Procedure**

Major injuries are those that require immediate professional medical attention (e.g., stitches, medication, X-rays, second- or third-degree burns, electrical shock).

The injured person or witness shall:

1. Report immediately to the supervisor or person trained in first aid.

The Emergency Response Coordinator shall (where applicable):

2. Organize a response team.
3. Contact authorities (i.e. 911)

Emergency Responders shall:

1. Assess hazards to ensure that no personal danger is involved.
2. Put on necessary personal protective equipment (PPE) and/or first aid equipment.
3. Shut down the operating equipment and/or processes in the location where the injured person or persons are (as required).
4. Ask injured person what happened (if conscious) and administer first aid (ABC airway clear, breathing observed, and circulation present).
5. Continue first aid as needed until other emergency response personnel arrive.
6. Receive and direct emergency response personnel to the incident site and assist where required.
7. Secure the scene as required for site control and incident investigation.

8. Assist in completing and verifying the incident report. If the injured worker is able to, assist in completing and verifying the incident report. If not, the supervisor shall complete the Flash Report with the Safety Lead/Advisor and issue it to management within 24 hours.

3.9.2.3 Electrical Shock Emergency Response Procedure

The first responder shall:

1. If possible, and it is safe to do so, switch off the power immediately.
2. Do not touch the victim with bare hands or other conductive materials.
3. If trained to do so, apply cardiopulmonary resuscitation (CPR) immediately after the victim has been released from the electrical contact, depending on the circumstances of the incident and the location where the incident took place. Be sure that it is safe for you to respond and you can access the injured person with no harm to you.
4. In many electrical incidents, the injuries are not from electrical shock, but from the after-effect of burns. Treat burns in accordance with the instructions on first aid.
5. If the victim can move without aid, ensure that he or she reports to a clinic or is taken to a hospital.
6. Report the incident to management immediately.
7. Secure the scene as required for site control and incident investigation.

Assist the injured worker to complete and verify the incident report. If the worker is unable to do this, the supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

Always Preserve and protect the incident (scene) site until investigations are complete.

3.9.3 First Aid

The first responder on the scene shall:

1. Immediately contact the first aid attendant on site or at the location.
2. First aid personnel will stop current activities and go to the injured employee.

First aid personnel must protect themselves against blood-borne pathogens by wearing protective barrier devices.

First Aid Delivery at a First Aid Room or Station

If the employee can be safely brought to the first aid station or room, the first aid attendant must proceed to the first aid station/room as quickly as possible.

The first aid attendant (person trained in first aid – CPR AED) will determine the extent of the injury and render appropriate first aid.

The first responder (initial person on scene) shall:

1. Follow the Steps Indicated in Element 15 Internal Management Incident Reporting and Timeline Process Flowchart for reporting the incident or emergency.
2. Complete the first aid report, issue a copy of the report to the employee, and to management, and retain one copy in the files.

3. Secure the scene as required for site control and incident investigation.
4. Assist the injured worker to complete and verify the incident report, If the worker is unable to do this, the supervisor shall complete the initial incident report with the HSE coordinator and shall issue it to management within 24 hours.

First Aid Delivered In the Field

The first responder (initial person on scene) shall:

1. If the injured employee is in a position of imminent danger, conduct an immediate hazard assessment and determine the quickest and safest way to extract the employee.
Do not place yourself at risk, Do not remove an injured employee if it cannot be done while ensuring the safety of the responder.
2. Remove the injured employee from the immediate area to a safe location of first aid.
3. Attend to the injured employee, determine the injuries and render applicable aid.
4. Follow the steps indicated in Element 15 Internal Incident Reporting and Timeline Process Flowchart for reporting the incident or emergency.
5. Secure the scene as required for site control and incident investigation.
6. Complete the first aid report, issue a copy of the report to the employee, a copy to management, and retain one copy in files.
7. Assist the injured work to complete and verify the incident report. If the injured worker is unable to do this, the supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.9.4 Medical Aid

The first responder shall:

1. Immediately contact the first aid attendant on site or at the location.

First aid personnel will:

1. Stop current activities and go to the injured employee.
2. Remove the injured employee from the immediate area to a safe location for applying first aid.
3. Attend to the injured employee, determine the injuries and render applicable aid.
4. If the injury requires medical attention, contact the nearest medical professionals and take the injured employee to the nearest hospital or clinic for immediate attention.
5. Report to FLINT management immediately.
6. Secure the scene as required for site control and incident investigation.
7. Assist in the injured worker to complete and verify the incident report. If the injured worker is unable to do this, the supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.
8. Ensure that appropriate Workers' Compensation Board (WCB) documentation is completed and issued to the injured employee, and return all information back to management for review and follow-up.

3.9.5 Fatality

The supervisor or person trained in first aid shall:

1. Contact one of the following authorities:
 - Supervisor/Manager
 - Area Manger, General Manager, District Manager, HSE Manager
 - HSE Lead
 - HSE Director
 - (911)
2. Shut down equipment and/or process in the location of the fatality.
3. Preserve and protect the incident site until investigations are complete.
4. Receive and direct emergency response personnel to the incident site.
5. Supervisor shall complete the **Flash Report** with the HSE Lead/Advisor and shall issue it to management as soon as possible.

The RCMP is to be notified immediately. RCMP and/or the senior manager shall contact the next of kin.

3.9.5.1 Non-Work-Related Fatality

The supervisor or person trained in first aid shall:

1. Contact one of the following authorities:
 - Supervisor/Manager
 - Area Manger, General Manager, District Manager, HSE Manager
 - HSE Lead
 - HSE Director
 - (911)
2. Shut down equipment and/or process in the location of the fatality.
3. Preserve and protect the incident site until investigations are complete.
4. Receive and direct emergency response personnel to the incident site.
5. Supervisor shall complete the **Flash Report** with the HSE Lead/Advisor and shall issue it to management as soon as possible.

3.9.6 Illness on the Job

3.9.6.1 Flu Conditions

FLINT has a specific pandemic process which is used in the event of a flu outbreak in the workplace (i.e., offices, shops, and camps).

Refer to the FLINT Influenza Pandemic Planning Policy for emergency response when an employee is determined to have or may have the flu.

In general, employees will be removed from the workplace and required to seek medical attention and to stay at home to recover until cleared to return to work.

Note: In extreme cases, to control the outbreak, the workplace (e.g., camps) may be quarantined by Provincial Health Services and all work at the location stopped.

3.9.6.2 Medical Conditions

Medical emergencies may include pre-existing conditions or events that cannot be managed by FLINT employees, including heart attack, asthma attack, allergic reactions, diabetes, or physiological issues.

Each medical event will be handled by protecting the employee or contractor and providing immediate medical attention. FLINT managers or supervisors will transport or arrange for safe transport of the employee to the nearest medical facility for immediate attention.

In all cases FLINT management will follow up directly with the employee by attending at the hospital or clinic directly and ensuring that all applicable paperwork and care for the person is managed effectively.

Assist the ill (sick) worker to complete and verify the incident report. If the worker is unable to do this, the supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.10 HYDROGEN SULFIDE EXPOSURE

7-Step Initial Emergency Response Procedure	
1. Evacuate	Evacuate to safe area (Observe wind direction move upwind if release is downwind, move crosswind if release is upwind of you. Move to higher ground if possible.)
2. Alarm	Call for help (MAN DOWN). Sound horn 3 times. Call 911 if man is down.
3. Assess	Do a headcount. Discuss what approach should be taken if a man is down (or how-to shut-in master valve where applicable).
4. Protect	Put on breathing apparatus before attempting rescue
5. Rescue	Downed man to a safe area
6. First Aid	Revive victim if necessary
7. Medical Aid	Arrange for medical transport if needed. Provide information to emergency medical services personnel.

3.10.1 Personal Rescue and First Aid

Once the injured worker(s) has been rescued, first aid or medical aid delivered trained and knowledgeable rescue, FLINT and/or client supervision must complete the following:

1. **Control Hazard** - Proceed to shut in master valve if safe to do so, completed under air until area is proven safe (ex. no ambient H2S or other risks).
2. **Contact** - Supervisor/Manager – immediately or when it is safe to do so.
3. **Preserve** - the incident site until investigations are complete and until incident report has been completed.
4. **Report** - Supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue a preliminary report to management within 24 hours.

3.11 FIRE RESPONSE PROCEDURES

Do not place yourself in danger if you do not have the knowledge or the proper training for the event, evacuate to a safe area and wait for emergency services. Do not attempt to extinguish truck containers, vessels, or tanks.

3.11.1 Minor Fires

Minor fires include wastebasket fires, small grass fires, burning rags, and small engine fires.

The first responder shall:

1. Shut down equipment in the location of the fire if possible and if it can be done safely.
2. If you are trained to do so and there is no risk to yourself, attempt to extinguish fire with a fire extinguisher or fire hose.
3. If fire gets out of control, evacuate immediately.
4. Initiate client ERP – contact the client immediately.
5. Contact the supervisor or manager.
6. Contact authorities (emergency services).

7. Call 911.

Designated Responders will:

1. Take appropriate action in event of an injury or fatality.
2. Preserve and protect the site until investigations are complete after the fire is extinguished.
3. Follow the steps indicated in Element 15 for reporting the incident or emergency (report the incident immediately to management)
4. Complete the incident report within 24 hours of the event and issue it to management.

3.11.2 Major Fires

Major fires include those in storage tanks, buildings, and truck tanks.

The first responder shall:

1. Initiate the evacuation plan by informing all personnel of the emergency via radio, phone, or a siren/horn.
2. If it is safe to do so:
 - shut down operating equipment and or processes – refer to driver’s manual for equipment-specific emergency shutdown procedures
 - shut off power/energy source if it is safe to do
 - evacuate site, muster personnel, and conduct a head count
 - organize a response team
 - take appropriate action in the event of an injury or fatality
 - initiate client ERP by contacting the client immediately where applicable.
3. Contact supervisor, manager
4. Contact authorities – (i.e. 911) Contact General Manager, Operations Manager or HSE Manager
5. Preserve and protect the site until investigations are complete after the fire is extinguished.
6. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.11.3 Shop and/or Office Fire

In the event of a shop or office fire:

1. Protect yourself and those around you.
2. Notify anyone in the shop by yelling FIRE, pull the alarm, or use the air horn.
3. Attempt to extinguish the fire if you are trained to use a fire extinguisher, and if it is safe to do so.
4. If you cannot contain the fire, evacuation will be required. Contact the Supervisor and/or Management so they can evacuate the office, shop and yard (where applicable).
5. Shut down equipment if it is safe to do so by:
 - i. shutting down operating equipment and or processes – refer to the driver’s manual for equipment-specific emergency shutdown
 - ii. shutting off power/energy source.
6. Initiate the evacuation plan and inform all personnel of the emergency via radio, phone, or a siren/horn.
7. Evacuate to the muster area and assist in the head count to ensure that all employees are accounted for.

8. Ensure that you have notified every one (ex. Fire Warden) of the fire and that everyone is leaving the building safely. Do a head count at the muster point.
9. Contact your neighbours and advise them of fire in the shop, office or yard.
10. Wait for the emergency services to arrive on site and assist with facility information and event.
11. Record all information in the sequence in which the events occurred.
12. Preserve and protect the site until investigations are complete after the fire is extinguished.
13. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

Return-To-Work

1. In all cases, local emergency services shall return the work site back to FLINT only after the fire has been put out and a competent, trained professional has deemed it safe to enter the site.
2. Crews should proceed with systematic return-to-work operations by:
 - determining the extent of damage
 - isolating any damaged equipment
 - taking necessary steps to prevent further damage, and controlling hazards in damaged areas
 - barricading damaged areas/section, and erecting temporary shelters as necessary
 - recalling personnel.
3. Clean up from the fire, which includes:
 - protecting all evidence
 - properly disposing of hazardous waste
 - hiring specialist clean-up crew (where applicable)
 - documenting clean-up activities
 - restoring the work site and surrounding area, including vegetation
 - alerting facility owners of occurrence and possible damages.

3.11.4 Tank Farm Fire (where applicable)

Chemical storage tanks and secondary containment are built to Provincial Fire Code standards and meet Petroleum Tank Management Association standards.

The steps below are to be followed in case of a fire with any tanks at a FLINT site:

1. Identify, either visually or by tank farm diagram, which tank is on fire.
2. Protect yourself and those around you. Notify anyone in the tank farm yard by yelling FIRE, pull the fire alarm, or use the air horn.
3. Contact Supervisor and inform them of the emergency.
4. DO NOT attempt to extinguish a fire that has spread into a tank or which has started inside a tank.
5. If it is safe to do so, attempt to contain or control the fire in a tank farm yard area using a 150 lb. fire extinguisher (where available).
6. If it is safe to do so:
 - shut down operating equipment and or processes (refer to driver's manual for equipment-specific emergency shutdown procedure)
 - shut off the power/energy source.

7. Initiate the evacuation plan and inform all personnel of the emergency via radio, phone, or a siren/horn
8. Evacuate to the muster area and assist in the head count to ensure that all employees are accounted for.
9. Ensure that you have notified every one of the fire and that everyone is leaving the building safely. Do a head count at the muster point.
10. Inform your neighbours of the fire in the tank farm.
11. Wait for emergency services to arrive on site and assist with facility information and event.
12. Record all information in the sequence in which the events occurred.
13. Preserve and protect the site until investigations are complete (after the fire is extinguished)
14. Follow the steps Indicated In Element 15 Internal Management Incident Reporting And Timeline Process Flowchart fore reporting the incident to management.
15. For reporting the incident or emergency (report the incident immediately to management).
16. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

Return-To-Work

1. In all cases local emergency services shall return the work site back to FLINT only after the fire has been put out and a competent, trained professional has deemed it safe to enter the site.
2. Crews should proceed with systematic return-to-work operations by:
 - determining the extent of damage and isolating any damaged equipment
 - taking necessary steps to prevent further damage and controlling hazards in damaged areas
 - barricading damaged areas or sections, and erecting temporary shelters as necessary
 - recalling personnel.
3. Clean-up from the fire includes:
 - protecting evidence
 - properly disposing of hazardous waste
 - hiring specialist clean-up crew
 - documenting clean-up activities
 - restoring the work site and surrounding area, including vegetation
 - alerting facility owners of the occurrence and possible damages.

3.11.5 Grass or Forest Fires

The steps below are to be followed in the event of a grass fire or forest fire.

Preparation

1. Secure the worksite upon warning/alert.
2. Close hatches on tanks, if applicable.
3. Shut down equipment and processes.

Action

1. Contact the fire department, 911 or local Forest Service Office to protect the worksite from the fire.
2. Evacuate employees to the nearest safe area.
3. Report the incident immediately to management.

4. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.12 LIGHTNING

The steps below are to be followed in the event of a lightning storm.

Preparation

1. Shut down equipment and processes if working outside.

Action

1. During a lightning storm, temporarily stop work activity immediately around the worksite.
2. Leave ground cable hooked up and remain inside the vehicle until the storm passes.
3. If the lightning storm results in injury, equipment damage, a spill event, or fire, refer to the appropriate ER Plan procedure.
4. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.
5. Do not return to work until the supervisor or client has deemed it safe to do so.

3.13 FLOOD/MUDSLIDE/ROCKSLIDE RESPONSE

The steps below are to be followed in the event of a flood, mudslide or rockslide.

Preparation

1. Remain constantly aware of weather and road conditions.
2. Ensure that In-Vehicle monitoring equipment (where applicable) is in proper operating condition by verifying that the equipment is active and able to send/receive text.
3. Maintain a line of communication with the dispatcher and or FLINT management.

Action

1. Evacuate employees to nearest safe area.
2. Inform client of stopping work.
3. Maintain communication with office.
4. If the flood/mudslide/rockslide results in injury, equipment damage, a spill event, or fire, refer to the appropriate ER Plan procedure (ex. first aid, environmental).
5. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.14 Earthquake Response Procedure

The steps below are to be followed in the event of an earthquake.

Preparation

1. Shut down equipment and processes.

Field Action

1. Rig out and leave site, only if it is safe to complete.
2. Check in with Supervisor and client once event has passed.

Terminal Action

1. Evacuate to safe area (e.g., doorways. Basements, under table, shelter in kind).
2. Perform a head count.
3. If the earthquake results in injury, equipment damage, a spill event, or fire, refer to the appropriate ER Plan procedure.
4. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and issue it to management within 24 hours.

3.15 TORNADO EMERGENCY RESPONSE PROCEDURE

The steps below are to be followed in the event of a tornado.

Preparation

In the event of a publicly announced tornado watch, employees are to be notified by their supervisor. Work activities are to be conducted in accordance with short notice stoppage procedures.

Action – On Location

In the event of a publicly announced tornado, employees are to:

3.15.1 Take cover (ditches, culverts, bridges) and:

- watch for debris
- rig out (if time permits)
- close valves (if time permits).

3.15.2 Check in with dispatch, management, and/or client (where applicable) once hazard has subsided.

Action – At Terminal/Office

In the event of a publicly announced tornado, employees are to:

1. Turn off gas/power if there is time to safely complete the task.
2. Take cover (stand in doorways or seek subterranean shelter).
3. Perform a head count.
4. If the tornado results in injury, equipment damage, a spill event, or fire then refer to the appropriate Emergency Response Plan procedure(s).
5. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.16 High Winds and/or Hail

The steps below are to be followed in the event of a high winds and/or hail.

Preparation

1. Secure light objects.
2. Protect equipment.
3. If driving pull over and stop in a safe area (with hazard lights engaged) until high winds and/or hail has passed.

Field Action

1. Take cover in an exposed area
2. Check for damage after the event is over
3. Contact supervisor

Facility Action

1. Remain indoors.
2. Ensure personnel working outdoors are evacuated indoors and accounted for.
3. Check for damage and clean up debris when the event is over.
4. If the high winds and/or hail result in injury, equipment damage, a spill event, or fire, refer to the appropriate ER Plan procedure.
5. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.17 Bomb Threat/Terrorism/Violence/Threats

In the event of a threatening situation, person unlawfully entering the premises with the intent of causing harm to people, equipment or environment, the follow procedure should be followed:

1. The person discovering the threat immediately contact supervision or management via radio, cell phone or landline.
2. Call 911 if the situation is determined to be immediately dangerous to life or health.
 - Management will assist in determining the threat level.
 - Employees are to remain at a safe location and are not to enter any area where it is unsafe.
3. Employees are to evacuate the building if it is safe to do so and meet at the muster point.

3.18 Chemical/Product Release (Spill)**3.18.1 Spill Response Procedure General**

The operator(s)/or personnel trained in spill response shall:

1. **Assess** – Protect yourself first and at all times. Protect others from injury by establishing a safe zone. Call District Manager and HSE Lead/Advisor, call 911 for assistance as required.
2. **Stop the Flow** – If deemed safe to do so, close a valve, turn off a pump.
3. **Contain** – Place spill socks, berm soil or snow to hold spill in place.
4. **Clean Up** – Collect spill with a vacuum truck or spill pads. Dispose of waste appropriately.
5. **Document** – Complete Incident Report with supervisor within 24 hours. Keep track of all volumes, types of fluid, and where it was sent for disposal. Take photos before, during and after clean-up. Report to regulatory authority as required (refer to Section 15 Incident – Injury Management – Reporting Requirements)

3.18.2 Small Volume Liquid Spill Response Procedure

For general, small volume spills (0-200 liters – non-dangerous goods or nonhazardous materials) in the office, shop, yard, highway, lease on private, crown company lands:

1. Implement the spill response protocol in Section 3.18 above.
2. Report the incident to Dispatch and/or Supervisor (where applicable)
3. Complete an FLINT Incident Report form and issue it to the HSE Lead/Advisor or designate for follow-up.
4. Report to regulatory authority as required (refer to Section 15 Incident – Injury Management – Reporting Requirements) considering the potential for an adverse environmental affect.

3.18.3 Dangerous Goods Event/Tank Farm Spill – Spill Response

Note: Remember, the most important goal is to protect people, including you from harm.

When dealing with a dangerous goods event or a tank farm spill (where regulated dangerous goods are stored), implement the five-step general spill response steps, inclusive of the following additional detailed requirements illustrated below:

1. **Assess:** Assess the situation and ensure that the area is safe from risk to yourself and others. If injuries are involved, initiate first aid procedures in Section 3.2, First Aid. If the injuries involve dangerous goods, consult the appropriate first aid measures section of the applicable SDS (Safety Data Sheet - GHS) for proper first aid procedures.
 - 1.1 Control/evacuate people to a safe distance from the area to avoid further injury or risk.
 - 1.2 Consult Safety Data Sheet (Global Harmonization System) for information on required PPE.
 - 1.3 Put on the required or additional PPE. Do not enter the area without safety in place and/or PPE.
 - 1.4 Contact FLINT personnel by following required steps for reporting the incident or emergency under section 15 of the FLINT SMS.
 - 1.5 Report the incident immediately to management and the local authorities/regulatory authority (Ex. Dangerous Goods and/or Environmental Protection)
2. **Stop the flow** of material by closing a valve or plugging a line (when it has been determined to do so safely).
3. **Contain** or limit any spills by stopping or plugging any leaks at the source. Building dykes or digging ditches are good starts towards the containment of spilled fluid. Prevent spills from entering waterways or public sewer systems.
4. **Clean up** the spilled material with available supplies (ex. spill socks, vacuum truck). Order additional resources, as needed.
5. **Document**
 - The supervisor shall complete Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.
 - Report the incident immediately to management, who will contact local authority and CANUTEC and Dangerous Goods CIC (where applicable)
 - Follow reporting procedures in the incident reporting section of this manual.
 - Do not discuss the incident or liability with anyone. Offer to help them get in contact with the nearest supervisor or manager if they have any questions.

3.18.4 Powder Chemical Spill Response Procedure

1. Implement the spill response protocol in Section 3.18 above.
2. Report the incident to Dispatch and/or Supervisor (where applicable)
3. Complete FLINT Incident Report form and issue it to the HSE Lead/Advisor or designate for follow-up.
4. Cover the powder spill with a plastic sheet or tarp to minimize spreading and keep the powder dry.

Do not clean-up or dispose of the powder, except under the supervision of a trained specialist.

3.19 VEHICLE INCIDENT (COLLISION) RESPONSE PROCEDURE

The steps below are to be followed in the event of a vehicle incident.

Secure Scene

1. Conduct a preliminary safety and spill assessment of the scene.
2. If there is a spill or release, refer to the spill response protocol in Section 3.18.

3. Radio or call for emergency support as required.
4. Contact Dispatch, management, or client where applicable.
5. Don hi-visibility clothing (jacket or vest) and all appropriate safety equipment.
6. Collect first-aid equipment, fire extinguisher, and other equipment, and enter the scene only when it is safe to do so.
7. Approach scenes cautiously. Always protect yourself from harm. Do not enter the immediate area without a preliminary assessment of the surroundings.

Action

1. Rescue injured parties from the vehicle only if there is imminent danger to life and limb; relocate them to a safe area nearby.
2. If there is no risk to the injured parties, do not move them.
3. Render immediate first aid as required.
4. Secure the scene, place safety triangles above and below the incident scene.
5. Follow the steps for reporting the incident or emergency In Element 15 Internal Management Incident Reporting and Timeline Process Flowchart of the FLINT SMS. Report the incident immediately to management and local authorities where applicable.
6. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.19.1 VEHICLE BREAKDOWN ON ROADSIDE PROCEDURE

The steps below are to be followed in the event of a vehicle breakdown.

1. Immediately activate hazard warning lights and pull off the road on the far-right shoulder, if possible.
2. Stop on the median only if there is no other option; ensure that the vehicle is well off the travelled lanes.
3. Set reflective triangles behind the vehicle, especially at night; or tie a white cloth to the left door handle or radio aerial.
4. Assess the situation and determine the extent of the equipment damage or breakdown.
5. Contact dispatch, management, or client (where applicable) immediately and provide details on the breakdown situation. Communicate retrieval method and responding personnel.
6. Keep tools, parts, tires, and people off the road and away from traffic when attempting any repairs.
7. Be cautious when someone approaches to help and, if needed, ask this person to contact the police or a tow truck.
8. Depending on the location, remain inside the vehicle, shut the windows, and lock the doors. In winter, if you leave the engine running, open a window slightly for air circulation, and make sure the exhaust pipe is not blocked by snow or mud.

9. When exiting the vehicle, ensure that you are wearing all appropriate PPE – high-visibility clothing and jackets. Visibility is critical for safely managing a breakdown on the road.

Always protect yourself. Hot and cold weather extremes can have a significant impact on you. Ensure that you are protected with warm weather gear, fluids, and energy food, as rescue support may be some time and distance away.

10. Stay with the broken-down vehicle unless there is a potential for significant personal harm.
11. Follow the steps indicated under Element 15 for reporting the incident or emergency. Report the incident immediately to management.
12. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.20 CONFINED SPACE RESCUE GENERAL PROCEDURE

Employees must not enter a confined or restricted space, or a zone where working at heights is being done unless an effective rescue can be carried out. Do not put yourself at risk.

Note: Specialized training on rescue is required to effectively and safely remove an injured employee from a confined or restricted space, or from a high angle zone. Key personnel (e.g., third-party experienced personnel or trained employees) will directly manage the rescue in most situations FLINT employees may encounter on the job.

FLINT has three levels of confined or restricted space hazard – high, medium, and low:

High Hazard: A confined or restricted space entry with limited means to conduct emergency rescues and immediately dangerous to life or health (IDLH) conditions.

Moderate Hazard: A confined or restricted space entry with hazards that can be controlled through engineering, administrative, or PPE controls.

Low Hazard: A confined or restricted space entry with hazards that can be controlled through PPE controls.

- In the event of an emergency requiring retrieval of personnel from the confined or restricted space, or from working at heights, the following procedures shall be followed.

High Hazard Rescue Procedures

A high hazard is a confined or restricted space entry with limited means to conduct emergency rescues, and with IDLH conditions. Confined and restricted space rescues must only be conducted by third-party, or client certified personnel.

- A. Immediately summon the emergency personnel or group identified on the permit.
- B. Assist rescue personnel upon their arrival and as directed.
- C. Assess the situation and initiate the emergency response plan, in general as outlined below.

3.20.1 Confined or Restricted Space Rescue Procedure

When an employee is down or injured in a confined or restricted space, fully trained rescue personnel shall put on the appropriate PPE (chemical gear, breathing air) before attempting a rescue.

1. Two fully trained rescue personnel, wearing the required PPE (SCBA/SABA) will enter the confined space and extract the injured employee safely to a secure location to render first aid immediately.
2. Only fully trained, third-party and / or client rescue personnel will rescue and remove the injured employee from a confined space. FLINT employees and/or third-party employees can both render first aid (in a safe location) as each group is fully trained in CPR and first aid techniques.
3. Seek immediate medical attention, in accordance with the FLINT medical aid emergency response procedure in Section 3.9 of this Emergency Response Plan.
4. Follow steps for reporting the incident or emergency under Section 15 Incident and Injury Claims Management of the FLINT SMS. Report the incident immediately to management.
5. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.20.2 High Hazard - High Angle Rescue Procedure

When an employee is injured or unconscious and suspended in a fall restraint harness above the ground or above an elevated surface, trained rescue personnel shall don the appropriate high angle rescue equipment and extract the injured employee in accordance with emergency plans.

1. Remove the injured employee to a safe location and render first aid immediately.
2. Seek immediate medical attention in accordance with the FLINT medical aid emergency response procedure in Section 3.9.4.
3. Follow The Steps Indicated in Element 15 Internal Management Incident Reporting And Timeline Process Flowchart for reporting the incident or emergency. Report the incident immediately to management.
4. The supervisor shall complete the Flash Report with the Safety Lead/Advisor and shall issue it to management within 24 hours.

3.20.3 Moderate Hazard Rescue

Moderate Hazard: A confined or restricted space entry with hazards that can be controlled through engineering, administrative, or PPE controls.

1. Assess the situation and initiate the emergency response plan, in general as outlined below:

Moderate Confined or Restricted Space Rescue Procedure

1. When an employee is down or injured in a confined or restricted space, fully trained rescue personnel shall don the appropriate PPE (chemical gear, breathing air) before attempting a rescue.
2. Two rescue personnel, wearing the required PPE (SCBA/SABA) will enter the confined space and extract the injured employee safely to a secure location to render first aid immediately.
3. Only fully trained third-party rescue personnel will rescue and remove the injured employee from a confined space. FLINT employees and/or third-party employees can both render first aid (in a safe location) as each group is fully trained in CPR and first aid techniques.
4. Seek immediate medical attention in accordance with the FLINT medical aid emergency response procedure in Section 3.9
5. Follow the steps indicated in Element 15 Internal Management Incident Reporting and Timeline Process Flowchart
6. for reporting the incident or emergency. Report the incident immediately to management.
7. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.20.4 Low Hazard Rescue

Low Hazard: A confined or restricted space entry with hazards that can be controlled through PPE controls.

1. Assist rescue personnel upon their arrival.
2. If it is safe to do so, operate the retrieval system to bring personnel from the confined space.

Low Hazard Confined or Restricted Space Rescue Procedure

In some instances (e.g., through a man way or hatch at the base of a 400-barrel tank) you may safely rescue an injured employee if you can quickly retrieve the employee with an attached lifeline and no additional personnel are required to enter the vessel.

1. Perform first aid or CPR as necessary to stabilize the victim and evacuate to a medical facility as soon as possible.
2. Follow the steps indicated in Element 15 Internal Incident Reporting and Timeline Process Flowchart for reporting the incident or emergency. Report the incident immediately to management. The supervisor shall complete the Flash Report with the HSE Lead/Advisor and shall issue it to management within 24 hours.

3.21 INFLUENZA PANDEMIC PLANNING

Refer to Influenza Planning Policy (separate documentation) for key requirements and trigger level response when there is an influenza outbreak at the workplace, found under the FLINT SMS – Element 3: Emergency Preparedness.

ATTACHMENTS:

Form 3A: Emergency Phone Numbers
SMS Element 15: Incident Investigation and Injury Management
Project Specific Safety Plan
Influenza Pandemic Policy

4.0 HAZARD ASSESSMENT AND CONTROL

Hazard Assessment is the basis for the prevention of incidents in the workplace. FLINT will ensure that a program is in place to identify, rank and control hazards within our operations and require all personnel to comply with applicable Provincial OH&S legislation.

Hazard Assessment is concerned with that which is immediately visible, but also examines the potential hazards that may be encountered.

4.0.1 Definitions

HAZARD - An object, condition or behaviour with the potential to interrupt or interfere with the orderly progress of an activity

HAZARD ASSESSMENT - A formal practice or procedure used to identify hazards that may create losses to people, equipment, materials, property or the environment.

RISK - Probability that during a period of activity a hazard will result in an incident with definable consequence.

RISK MANAGEMENT - Is the reduction of the consequence and probability of risk or risks to an acceptable level in order to allow the work activity to continue safely and ensuring a zero-injury workplace.

4.0.2 Responsibility

All FLINT employees are required to conduct hazard assessments in their workplace (where applicable) and ensure the hazard assessment document through one or potentially all of the following (dependent on the task and level of risk identified):

- Field Level Hazard Assessment (FLHA)
- Pre-Job Hazard Assessment (PJHA)
- Job Hazard Assessment (JHA)
- Shift Start and End Meeting Form
- Client permits (Ex. Hot/cold work, confined space, high angle work etc.)
- Client Hazard Assessment process/documentation

ALL EMPLOYEES

- Identify, correct, and document hazards in the workplace.

SENIOR MANAGEMENT

- Support the risk management initiatives in their area of responsibility.
- Ensure that employees under their supervision complete hazard assessments as required in the FLINT Health and Safety Management System.

OCCUPATIONAL HEALTH, SAFETY AND ENVIRONMENT DEPARTMENT

- Provide Hazard Assessment Training to the organization.
- Periodically review hazard assessments for accuracy and relevance to the work being performed.
- Assist with hazard assessments where required.

LINE MANAGEMENT

- Ensure that corrective or hazard reduction actions identified in the hazard assessment process are implemented in their areas of responsibility.

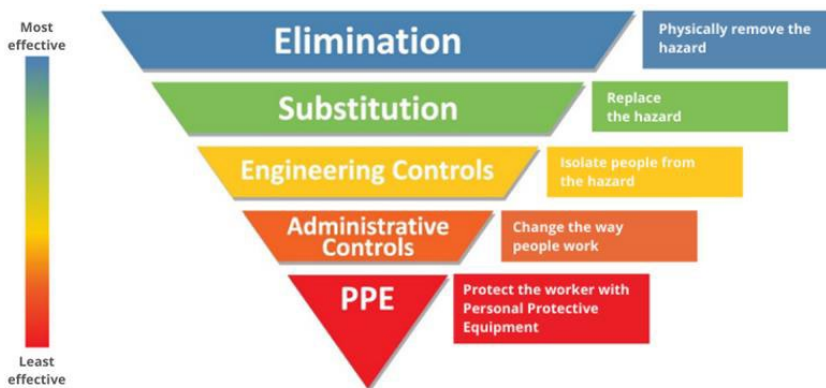
SUPERVISORS

- Conduct hazard assessments as required under the FLINT Health, Safety and Environmental Management System.
- Identify current and future methods of control for each hazard identified.
- Review completed hazard assessments with employees.

4.0.3 Hazard Assessment Requirements

- Hazard Assessments must be completed to the minimum standards listed below. Hazard assessment requirements may increase due to customer requirements, legislation and workplace conditions.
- All Hazard Assessments must be completed using the appropriate Hazard Assessment Form and the Risk Matrix.
- All identified hazards must be ranked assessing both the probability and severity of a hazard using the Risk Matrix.

4.0.4 Hazard Control Strategies



4.0.4.1 Eliminate /Substitute the Hazard

As a starting point and whenever possible elimination of a hazard is a solid course of action for addressing hazards in the workplace. Redesign of the equipment or workplace layout directly addresses hazard before they are created (Ex. Laying of airlines for SABA out of walkways or routes of travel eliminating the potential for a slip or fall. Substitution of material, equipment, or process for a lesser hazard, (Ex. Bulk chemicals in 9 kilograms versus 18 kilograms bags).

4.0.4.2 Engineering Controls

Engineering control of hazards deals with the elimination or isolation of the hazard from the employee, and physically limits the employee’s exposure to the hazard. Engineering controls are the preferred method of controlling hazards.

4.0.4.3 Administrative Controls

Administrative controls deal with the directing of people and include policy, procedure, and training. Administrative controls reduce or limit the amount of exposure an employee has to a specific hazard.

4.0.4.4 Personal Protective Equipment

Personal Protective Equipment is the final line of defense against hazards in the workplace. It is implemented only after other reasonably practicable means of eliminating a hazard have been attempted.

4.1 FIELD LEVEL HAZARD ASSESSMENT (FLHA)

4.1.1 Purpose

Field Level Hazard Assessment (FLHA) is the corner stone of FLINT Energy Services HSE Program. FLHA is used to identify hazards and hazard control associated with each task a worker or crew is assigned. FLHA allows line management an ongoing opportunity to promote teamwork, worker participation provide feedback and positive reinforcement.

Applicable HSE professional and/or supervisor will conduct regular FLHA audits, at point of task, or during a formal FLHA audit monthly or overall audit attest (quarterly basis)

4.1.2 Scope

Field Level Hazard Assessment is a safety tool to assist in:

- Hazard identification, evaluation, and control methods.
- Communications and feedback between all personnel.
- Teamwork by encouraging worker involvement and participation.
- Positive reinforcement of safe work activities and behaviours.
- Effective job planning.

The Supervisor or designate must conduct a Field Level Hazard Assessment using the FLHA card before any new work begins, this shall involve the crew in the assessment process.

Superintendents are responsible to monitor and ensure FLHA's are conducted in their areas of responsibility.

Supervisors are responsible for the conduct of FLHA's with their crew(s) in their area of responsibility.

4.1.3 Requirements

FLHA Set-up

- Supervision trained to conduct FLHA.
- Workers informed about FLHA at orientation. All workers will receive FLHA cards.
- Posters placed:
 - On bulletin boards
 - In meeting rooms
 - In lunchrooms
 - In sign on offices
 - In office trailers
 - In tool rooms
 - In orientation rooms

Field Level Hazard Assessment (FLHA) Requirements

Field Level Hazard Assessments are conducted:

- At the beginning of each work assignment.
- When new workers are assigned to the job or task.
- When job conditions change (e.g., changed task, changed location, new equipment moved into or out of area, weather change, etc.).
- By the Foreman and their crew.
- By a competent worker designated by the Foreman or Superintendent.
- At the actual work areas where the job-related tasks are to be done and the hazards relating to the tasks are present.
- In addition to any Client or other Safe Work Permit.
- To complement any Job Hazard Assessment.

Field Level Hazard Assessment is not conducted:

- As a morning safety meeting.
- Using a topic developed by the safety department.

4.1.4 Field Level Hazard Assessment Procedure

Foreman and crew discuss the tasks and hazards at the work area using the FLHA card.
Complete all information requested on the FLHA card.

TOP SECTION OF FLHA FORM

GENERAL INFORMATION

1. Complete the top section of the FLHA filling in Company Name, Work to be done, Task Location, Muster Point, Permit Date, PPE inspected.

MIDDLE SECTION OF FLHA FORM

(COLUMN 1) **TASKS**

2. IDENTIFY and WRITE DOWN TASKS for the job in the Tasks section.

(COLUMN 2) **HAZARDS**

3. IDENTIFY AND WRITE DOWN THE HAZARDS for each task in the HAZARDS section. Use existing documents to assist in identifying workplace hazards.

(COLUMN 3) **RISK**

4. RISK RANK EACH HAZARD IDENTIFIED determine risk as LOW – MEDIUM – HIGH as assessed using the
5. Risk Matrix.

(COLUMN 4) **MITIGATION OR CONTROL MEASURES**

6. IDENTIFY AND WRITE DOWN THE CONTROL MEASURES for each task in the HAZARDS section.

(COLUMN 5) **RESIDUAL RISK**

7. RISK RANK EACH HAZARD IDENTIFIED determine risk as LOW – MEDIUM – HIGH as assessed with control measures in place.

BOTTOM SECTION OF FLHA FORM

SUPERVISOR AND ALL WORKERS SIGN the document. Additional workers, other personnel that arrive later to the work area should review the FLHA and sign the document accordingly.

8. **PERFORM THE TASKS** – continuously monitor conditions and worksite for changes “Stop & Think” throughout the day and activity, prevent incident and injury!
9. **SUPERVISOR** (Foreman) print and sign name upon review of completed FLHA.

All workers should have an FLHA card in their pockets to review hazards when necessary.

Sample FLHA Card

The form includes sections for Environmental Control, Overhead Control, Ergonomic Control, Access/Egress Control, Mobile Equipment, Personal Limitations/Control, Rigging & Hoisting Control, Electrical Control, General Control, and icons for various hazards like fire, electrical, and falls. It also features a risk matrix table and signature lines for the worker and supervisor.

4.1.5 Management System

- Use Behaviour Observations Process to reinforce the use of FLHA.
- FORM 4BA: Field Level Hazard Assessment Quality Audit may be used to monitor the use and conduct of FLHA.

This form includes fields for Work/Task to be done, Task Location, Date, and Emergency Phone. It features a large grid with columns for TAGS, HAZARDS, RISK, PLANS TO ELIMINATE/CONTROL, RISK, and INITIAL. Below the grid are fields for 'What situation would cause you to stop work today (Stop Work Authority)?', Wind Direction, and Evacuation path.

4.2 PRE-JOB HAZARD ASSESSMENT

4.2.1 Purpose

The Pre job Hazard Assessment (PJHA) provides risk identification to enhance a Project Specific Safety Plan (PSSP) prior to site mobilization upon project award.

The intent of the PJHA is to capture the entire scope of work on the project for a medium to high risk task, any emergency task not previously assessed, or future tasks that cannot be assessed at mobilization.

4.2.2 Definition

The Pre Job Hazard Assessment (PJHA) is led by the designated Project Manager with the Superintendent and other identified competent key field personnel providing field expertise on identifying hazards associated with the work to be carried out and ensuring processes are in place to mitigate the risk. The complete Pre Job Hazard-Assessment (PJHA) process is supported by the HSE Area Manager/ Lead and is designed to encourage interactive communication among the team.

4.2.3 High Risk

High risk work activities shall include but are not limited to:

- Tasks that have involved, or have the potential for, serious or frequent injury
- Tasks that have the potential for environmental impact
- Tasks that have involved, or have the potential for, major or frequent equipment damage
- Tasks not adequately covered by existing procedures
- Tasks requiring a variance of existing procedures

4.2.4 Pre-Job Hazard Assessment (PJHA) Procedure

- Form 4A – Pre-Job Hazard Assessment should be completed with a group involving management, first line supervisors and workers.
- Pre-Job Hazard Assessment does not require a large amount of personnel to complete, but they do require a cross section of experience and viewpoints to be successful.
- It is important that PJHA's are completed with involvement from the workers performing the tasks. This will result in a more thorough Assessment of the work and hazards.
- It is also important that the completed PJHA be reviewed with all personnel involved prior to the start of the work. Each person involved in the task must review, sign and date.
- One person facilitating the ideas of the group, following the Pre-Job Hazard Assessment format, can be a useful tool for completing the PJHA.

Pre-Job Hazard Assessment involves completion of the following steps:

- **PAGE ONE OF PRE-JOB HAZARD ASSESSMENT FORM DOCUMENT:**
 - 1.1 Client, Date Area, Location, Time
 - 1.2 Task/Scope
 - 1.3 What findings need to be considered for the PJHA development
 - 1.4 Approval – Name and Signature
 - 1.5 Description of job steps & potential hazards & controls
 - 1.6 Risk Rating

➤ **PAGE TWO OF PRE-JOB HAZARD ASSESSMENT FORM**

1. Document the basic steps or tasks Steps (Column One)
2. Identify hazards or potential hazards (What Could Go Wrong) using the methods as indicated in the Hazard Assessment Policy
3. Identify hazard controls (How Can Harm Be Prevented) or existing Codes of Practice, Safe Job Procedures or Safe Work Practices, and Job Hazard Assessment that will protect against the hazards
4. Worker/Supervisors Signatures, when the Job Hazard Assessment is complete, reviewed and approved.

4.1 JOB HAZARD ANALYSIS

4.2

4.2.1 **Purpose**

The purpose of this procedure is to establish a process to evaluate and control high-risk work activities.

4.2.2 **Definition**

The Job Hazard Analysis (JHA) process revolves around involving employees in the identification and discussion of necessary safety measures that pertains to the potentially high-risk job they will be performing.

4.2.3 **High Risk**

High risk work activities shall include but are not limited to:

- Tasks that have involved, or have the potential for, serious or frequent injury
- Tasks that have the potential for environmental impact
- Tasks that have involved, or have the potential for, major or frequent equipment damage
- Tasks not adequately covered by existing procedures
- Tasks requiring a variance of existing procedures

4.2.4 **Job Hazard Analysis (JHA) Procedure**

- Form 4C - Job Hazard Analysis should be completed with a group involving management, first line supervisors and workers.
- Job Hazard Analysis does not require a large amount of personnel to complete, but they do require a cross section of experience and viewpoints to be successful.
- It is important that JHA's are completed with involvement from the workers performing the tasks. This will result in a more thorough analysis of the work and hazards.
- It is also important that the completed JHA be reviewed with all personnel involved prior to the start of the work. Each person involved in the task must review, sign and date.
- One person facilitating the ideas of the group, following the Job Hazard Analysis format, can be a useful tool for completing the JHA.

Job Hazard Analysis involves completion of the following steps:

➤ **PAGE ONE OF JOB HAZARD ANALYSIS FORM DOCUMENT:**

1. Client, Date Area, Location, Time
2. Task / Scope
3. Work permit
4. Work area inspection / and by whom
5. What findings need to be considered for the JHA development
6. Worker understanding – Name and Signature
7. Modification or change in conditions of existing JHA

➤ **PAGE TWO OF JOB HAZARD ANALYSIS FORM**

1. Document the basic job steps or tasks Steps (Column One)
2. Identify the hazards or potential hazards (What Could Go Wrong) using the methods as indicated in the Hazard Assessment Policy
3. Identify Hazard Controls (How Can Harm Be Prevented) or existing Safe Job Procedures or Safe Work Practices that will protect against the hazards
4. Assigned Person – specific to task hazard controls will be identified followed by initial of the designated person for confirmation of task safely completed.
5. Supervisor Signature, when the Job Hazard Analysis is complete, reviewed and approved.

4.2.5 Safe Work Practice and Procedure Development

Job Hazard Assessment can be used to develop safe job procedures. To develop a Safe Work Practice and/or a Safe Work Procedure refer Element 8 and 9 of the FLINT Safety Management System Manual.

4.2.6 Hazard Identification Forms

Hazard ID is a formal process of documenting a hazard and submitting for mitigation. Completed in the field, Hazard ID's can be completed manually or digitally.

5.0 LIFE SAVING RULES

FLINT has adopted the Energy Safety Canada Life Saving Rules which all employees, contractors, and visitors must follow (adhere to) while conducting work on behalf of the company.

The ten Life Saving Rules as defined by Energy Safety Canada have been established as critical to the well-being of all personnel working with FLINT and are recognized throughout the workplace as requirements for conducting safe work and preventing injury or incident in the workplace.

Failure to adhere to the following work expectations will lead to discipline up to an including termination of employment. The general categories and poster are below.

10 LIFE SAVING RULES:



CONFINED SPACE



WORKING AT HEIGHT



WORK AUTHORIZATION



ENERGY ISOLATION



LINE OF FIRE



BYPASSING SAFETY CONTROLS



DRIVING



HOT WORK



SAFE MECHANICAL LIFTING



FIT FOR DUTY



5.1 CONFINED SPACE

- I confirm energy sources are isolated
- I confirm the atmosphere has been tested and is monitored
- I check and use my breathing apparatus when required
- I confirm there is an attendant standing by
- I confirm a rescue plan is in place
- I obtain authorization to enter

Additional Guidance:

- Energy sources may be pneumatic, hydraulic, mechanical, gravitational, chemical, electrical, nuclear, thermal or any other energy that could cause injury
- Entry into a confined space includes the worker's body entering the space or the worker's head crossing the plane of the confined space access

Supervisor:

- I ensure confined spaces are identified and workers are competent
- I ensure a hazard assessment is conducted
- I ensure energy sources are isolated
- I ensure an adequate emergency rescue plan is in place

Worker:

- I have the required training and knowledge to safely perform work
- I confirm the breathing apparatus is appropriate based on the work permit, hazard assessment or work procedure
- I confirm an attendant is standing by and I am authorized to enter

Attendant:

- I have the required training and knowledge to safely perform work
- I control access to the confined space
- I conduct atmosphere testing and monitoring using appropriate equipment that includes, at a minimum, combustible gas, oxygen, H₂S and carbon monoxide and may include, but not limited to, benzene and other hydrocarbons, sulphur dioxide etc. depending on the hazard assessment
- I understand how to initiate and notify rescue personnel and/or initiate an evacuation as necessary

Example Violations

- The supervisor does not confirm energy sources are isolated prior to entry by a worker
- Testing and monitoring of the atmosphere is not conducted or confirmed prior to entry as per the work permit, hazard assessment or work procedure
- Breathing apparatus is not inspected prior to donning
- A confined space is entered without wearing the required breathing apparatus
- A confined space is entered without first obtaining authorization from the attendant
- A confined space is entered when no attendant is present
- A rescue plan is not in place



5.2 WORKING AT HEIGHT

- I inspect my fall protection equipment before use
- I secure tools and work materials to prevent dropped objects
- I tie off 100% to approved anchor points while outside a protected area

Additional Guidance:

- approved anchor points and a rescue plan
- I ensure workers are competent to use fall protection equipment

Supervisor:

- I ensure a fall protection plan is in place that identifies fall protection equipment including fall restraint, fall arrest, approved anchor points and a rescue plan
- I ensure workers are competent to use fall protection equipment

Worker:

- I have the required training and knowledge to safely perform work
- I ensure that safe guards, barriers or safety nets are in place
- I ensure that anchor points and fall protection equipment are inspected and in good condition prior to use
- I use only approved anchor points
- I verify that clearances below the work area are sufficient if an arrested fall occurs
- I secure hand tools and work materials to prevent dropped objects
- I am always tied off when at height outside a protected area

Example Violations:

- A fall protection plan is not present
- Fall protection equipment is used by someone who has not been deemed competent in fall protection
- Fall protection equipment is not inspected prior to use or the equipment is used when deficiencies are identified
- Equipment is used as a tie off that is not an approved anchor point
- Fall protection is not used when working at height outside a protected area
- Fall protection is used that does not offer sufficient clearance if an arrested fall occurs
- Fall protection is used but no rescue plan is in place
- Hand tools and materials are not secured while working above an area where workers may be present



5.3 WORK AUTHORIZATION

- I have confirmed if a permit is required
- I am authorized to perform the work
- I understand the permit
- I have confirmed that hazards are controlled and it is safe to start
- I stop and reassess if conditions change

Additional Guidance:

Changing conditions may include:

- Changes in what was originally planned and captured on the permit
- Changes in work environment
- Changes in equipment
- Changes in process or operating parameters
- Changes in personnel

Supervisor:

- I ensure the need for a work permit is understood by workers and it is safe to proceed
- I stop and reassess if conditions change
- I confirm the work is complete, and the work permit is signed off

Worker:

- I have the required training and knowledge to safely perform work
- I understand and follow the work permit
- I confirm hazards are controlled as stated on the work permit and that it is safe to start work
- I stop and reassess if conditions change

Permit Issuer:

- I have the required training and knowledge to safely issue work permits
- I ensure the work permit is specific to the work being planned
- I ensure adequate systems and equipment are in place for effective communication
- I ensure that any simultaneous operation which may impact the work on this permit, or if the work may impact the work of others, is identified, controlled and communicated

Example Violations:

- Work is started without confirming whether a work permit is required
- Simultaneous operations are not addressed in the work permit resulting in an incident
- Work is conducted outside of the scope of the work permit
- Hazard controls identified in the work permit are not implemented
- A significant change occurs and is identified, but it is not brought to the supervisor's and/or permit issuer's attention



5.4 ENERGY ISOLATION

- I have identified all energy sources
- I confirm that hazardous energy sources have been isolated, locked, and tagged
- I have checked there is zero energy and tested for residual or stored energy

Additional Guidance:

- Energy sources may be pneumatic, hydraulic, mechanical, gravitational, chemical, electrical, nuclear, thermal or any other energy that could cause injury
- For energy isolation to be an effective barrier, the energy must be turned off, locked out and tagged
- Specified life-protection equipment such as respiratory protection, electrical arcflash protection, chemical-resistant gloves and suits protect you from certain types of hazardous energy
- Testing for residual or stored energy may involve measuring pipeline pressure, gas detection, electricity and radiation measurements, etc.

Supervisor:

- I confirm that isolation is in place and that no stored energy or other hazardous energy remains
- I ensure adequate systems, processes and equipment (e.g. locks, tags, etc.) have been used as per site requirements

Worker:

- I have the required training and knowledge to safely perform work
- I confirm with my supervisor or the person in charge that isolations are in place and it is safe to start work
- I ensure life-protecting equipment is used as indicated
- I never remove a lock that is not mine without authorization

Example Violations:

- Energy sources are not identified on the work permit or hazard assessment
- Hazardous energy is not turned off, locked and/or tagged
- Life-protecting equipment indicated on the work permit, hazard assessment or work procedures is not worn
- Someone else's lock is removed without authorization
- Testing for residual or stored energy is not conducted as per the work permit, hazard assessment or work procedures
- Piping is opened without verifying the line is depressurized
- Gas detection alarms are ignored
- Electrical measurements are not conducted to verify the circuit is no longer live Fall protection is used but no rescue plan is in place



5.5 LINE OF FIRE

Additional Guidance:

- I position myself to avoid:
 - Moving objects
 - Vehicles
 - Pressure releases
 - Dropped objects
- I establish and obey barriers and exclusion zones
- I take action to secure loose objects and report potential dropped objects

Supervisor:

- I ensure I have identified and controlled all line of fire hazards and associated risks
- I ensure workers are competent in line of fire hazard assessment and control
- I ensure line of fire, barriers and exclusion zones are incorporated into work permits, hazard assessments and work procedures
- I correct any unsafe conditions where workers are in the line of fire as dictated by equipment design, and seek engineering support to remedy

Worker:

- I have the required training and knowledge to safely perform work
- I position myself to avoid moving objects, vehicles, pressure releases and dropped objects
- I adhere to barriers and exclusion zones identified in work permits, hazard assessments and work procedures
- I identify any unsafe conditions where I am in the line of fire as dictated by equipment design and notify my supervisor
- I ensure my vehicle is secured (in park, emergency brake on, wheels chocked, etc. as appropriate) to prevent a line of fire hazard
- I secure hand tools and materials to prevent dropped objects
- I take action when I or someone else is in an unsafe position relative to line of fire or dropped object hazards
- I report to my supervisor potential line of fire and dropped object hazards

Example Violations:

- Line of fire hazards are not assessed and mitigated as part of the work permit, hazard assessment or work procedures
- Barriers and exclusion zones are ignored
- Sufficient remedial action is not taken when equipment design which puts personnel in the line of fire is identified
- Hand tools and other equipment are not secured to prevent dropped objects
- Action is not taken when line of fire or potential dropped objects are identified



5.6 BYPASSING SAFETY CONTROLS

- I understand and use safety-critical equipment and procedures which apply to my task
- I obtain authorization before:
 - Disabling or overriding safety equipment
 - Deviating from procedures
 - Crossing a barrier

Additional Guidance:

- Safety-critical equipment must work correctly to keep you safe
- Some examples of safety critical equipment include:
 - Isolation devices
 - Relief valves
 - Emergency shutdown devices (ESD)
 - Lock-out/tag-out devices
 - Fire and gas detection controls
 - Emergency breathing apparatus (SCBA)
 - In-vehicle monitoring systems
 - Electronic logging device (ELD)
- Safety critical procedures must be followed
- Drug and alcohol test equipment and procedures are defined as safety critical

Supervisor:

- I ensure safety critical equipment and procedures are identified and communicated to workers
- I ensure workers are competent in the use and limitations of safety critical equipment and procedures
- I confirm all proper authorizations are obtained

Worker:

- I have the required training and knowledge to safely perform work
- I obtain authorization from my supervisor or the person in charge if required to override or disable a safety critical control
- I stop work and notify my supervisor if a procedural deviation is required
- I do not cross barriers or exclusion zones

Example Violations:

- Safety critical procedures are not followed
- Intentionally exceeding safe operating design limits for process equipment
- An ESD is bypassed without authorization
- Someone else's lock is removed without authorization
- Gas or fire detection are bypassed without authorization
- Gas detection is not worn or is not turned on as per the work permit, hazard assessment or work procedures
- Gas detection alarms are ignored
- Emergency SCBA is used for routine work
- Tampering of in-vehicle monitoring systems
- Defeating a drug or alcohol test
- A barrier or exclusion zone is ignored



5.7 DRIVING

- I always wear a seatbelt
- I do not exceed the speed limit, and reduce my speed for road conditions
- I do not use phones or operate devices while driving
- I am fit, rested and fully alert while driving
- I follow journey management requirements

Supervisor:

- I ensure workers are competent drivers for the environmental conditions anticipated with their work
- I ensure vehicles are fit for purpose and adequately maintained
- I ensure a journey management plan is created

Driver:

- I always wear a seatbelt and do not move the vehicle until all passengers have their seat belts on
- I do not speed, and I reduce speed for the road conditions such as when there is traffic congestion, adverse weather, etc.
- I do not use electronic devices to send or receive communications while driving unless otherwise authorized
- I obey the rules of the road
- I ensure equipment and materials in the vehicle are secured so they are not a distraction or a line of fire hazard to the driver or passengers in the event of an incident
- I know when a journey management plan is required and follow that plan
- I conduct pre-trip inspections of the vehicle
- I take the required rest breaks and ensure I am fully alert (fit for duty) and working within the allowable hours of service
- I stop and reassess if conditions change, such as weather

Example Violations:

- A seat belt is not worn by the driver or a passenger while the vehicle is in motion
- The vehicle is traveling over the speed limit
- The driver uses an unauthorized electronic device while the vehicle is in motion
- The cab of a vehicle contains equipment or materials that are not secured
- The passengers in the vehicle are distracting the driver
- The journey management plan identifies unacceptable risk from extreme weather and the journey is conducted anyway
- The pre-trip inspection identifies an unacceptable vehicle condition, but the trip is conducted anyway
- The driver has exceeded the allowable hours of service
- Conditions change during the journey when an extreme weather storm moves in and the driver does not stop and reassess the journey



5.8 HOT WORK

- I identify and control ignition sources
- Before starting any hot work:
 - I confirm flammable material has been removed or isolated
 - I obtain authorization
- Before starting hot work in a hazardous area I confirm:
 - A gas test has been completed
 - Gas will be monitored continually

Additional Guidance:

- Ignition sources in relation to hot work may include welding, braising, cutting and any other activity that may generate an open flame or heat source
- Residual or stored energy in the form of trapped flammable gases and vapours may be present in equipment

Supervisor:

- I ensure workers have and use a work permit as indicated by work procedures and/or site requirements
- I ensure workers are competent in the control of ignition sources, the management of fuel sources, and the use and limitations of combustible gas monitors
- I confirm that any simultaneous operation which may impact work is addressed in the work permit

Worker:

- I have the required training and knowledge to safely perform work
- I obtain a work permit for hot work activities and obtain permission to bypass safety critical equipment such as flash detection (fire eyes)
- I identify and remove or isolate flammable materials such as gases, liquids and solids
- I conduct testing for residual or stored energy and only proceed with work when the energy is zero
- I conduct combustible gas testing prior to starting work and continually during the work
- I only smoke in designated areas

Example Violations:

- Welding sparks are not being controlled
- Flammable materials located below a pipe being cut with a torch are not removed or isolated
- Welding is conducted with no hot work permit being issued
- Trapped vapours have not been purged
- Combustible gas testing is not conducted prior to and during hot work activities
- Smoking outside of designated area



5.9 SAFE MECHANICAL LIFTING

- I confirm that the equipment and load have been inspected and are fit for purpose
- I only operate equipment that I am qualified to use
- I establish and obey barriers and exclusion zones
- I never walk under a suspended load

Additional Guidance:

- Safe mechanical lifting applies to equipment or loads that are lifted by mechanical means.
- A suspended load is an object that is temporarily lifted and hangs above the ground. This applies to equipment and loads that have not been designed for workers to be beneath it during operation.
- A lift plan identifies the weights and dimensions, how the lift will progress, communication requirements (signal personnel), weather and ground conditions, etc.
- Line of fire is a significant risk with overhead loads and moving equipment

Supervisor:

- I ensure workers are competent to operate the mechanical lift
- I ensure a lift plan is in place and that workers follow the plan
- I ensure barriers and exclusion zones are established, communicated and adhered to by site personnel

Worker:

- I have the required training and knowledge to safely perform work
- I ensure I am fit for duty
- I follow the lift plan
- I inspect the lifting equipment and adhere to all certification requirements
- I confirm the lift equipment is fit for purpose and I operate the lifting equipment below its working load limits
- I ensure line of fire hazards in relation to overhead power lines are identified, marked, and a safe distance is maintained
- I use tag lines to position suspended loads
- I adhere to barriers and exclusion zones

Example Violations:

- The lift operator is not competent to conduct the lift, but does so anyway
- The lift operator is not fit for duty, but conducts the lift anyway
- A lift is conducted without a lift plan
- The lift equipment and load are not inspected prior to the lift
- The lift is conducted with equipment that does not have the proper certifications
- A lift is conducted beyond its working load limits
- A safe distance is not maintained from overhead power lines
- The load is positioned using worker's hands instead of tag lines, putting the workers under the suspended load
- Barriers and exclusion zones are not established



5.10 FIT FOR DUTY

- I will be physically and mentally in a state to perform my assigned duties
- I commit to not being under the influence of alcohol or drugs
- I will inform a supervisor immediately if I or a co-worker may be unfit for work

Additional Guidance:

- Workers or supervisors who are physically and mentally in a state to conduct their assigned duties are:
 - Physically capable of performing the duties (physical demands analysis)
 - Rested (not fatigued)
 - Mentally alert (mind on task)
 - Able to effectively communicate to their supervisor and co-workers
 - Not under the influence of drugs and alcohol

Supervisor:

- I ensure I know how to recognize the signs of a worker who is not fit for duty
- I ensure I investigate and take action if I have reason to believe a worker may be unfit for work
- I ensure workers are physically capable of completing the assigned duties and have the necessary communication skills
- I ensure workers under my supervision are not subject to harassment or violence, as that may impact their fitness for work
- I ensure harassment or violence incidents are investigated and corrective action is taken

Worker:

- I notify my employer of any medical condition that may influence my ability to perform work safely
- I notify my employer if I am using over the counter (OTC) medications that may influence my ability to perform work safely

Example Violations:

- A worker or supervisor participates in or knowingly condones workplace harassment
- A worker or supervisor fails a drug or alcohol test
- Using illegal drugs at site
- A worker or supervisor is taking prescription medication or over the counter (OTC) medication that is likely to affect their performance and have not disclosed this to their employer
- An unfit worker is observed but not reported

ENERGY SAFETY CANADA – LIFE SAVING RULES POSTER

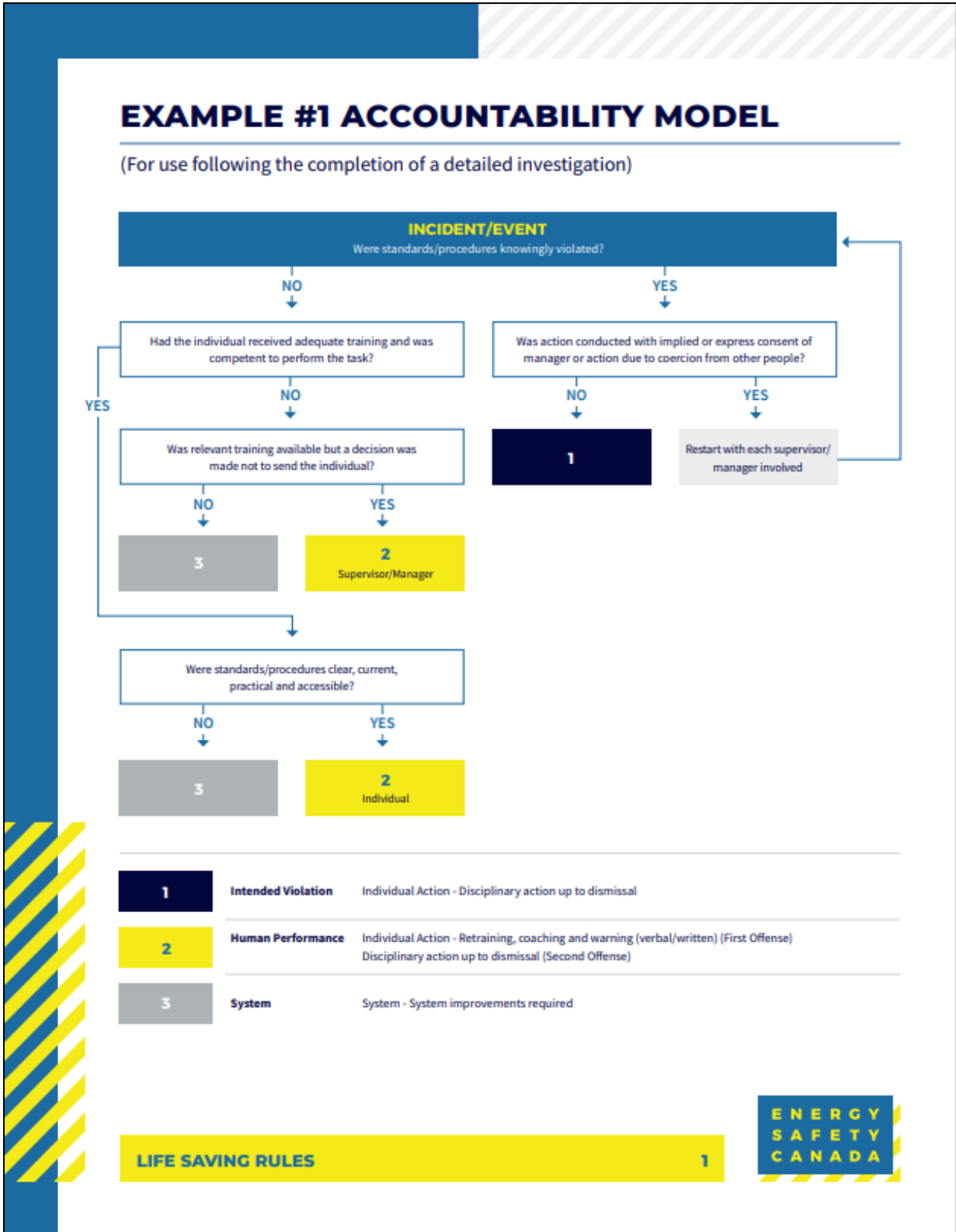
LIFE SAVING RULES

 <p>CONFINED SPACE</p> <p>Obtain authorization before entering a confined space</p> <ul style="list-style-type: none"> • I confirm energy sources are isolated • I confirm the atmosphere has been tested and is monitored • I check and use my breathing apparatus when required • I confirm there is an attendant standing by • I confirm a rescue plan is in place • I obtain authorization to enter 	 <p>WORKING AT HEIGHT</p> <p>Protect yourself against a fall when working at height</p> <ul style="list-style-type: none"> • I inspect my fall protection equipment before use • I secure tools and work materials to prevent dropped objects • I tie off 100% to approved anchor points while outside a protected area 	 <p>WORK AUTHORIZATION</p> <p>Work with a valid permit when required</p> <ul style="list-style-type: none"> • I have confirmed if a permit is required • I am authorized to perform the work • I understand the permit • I have confirmed that hazards are controlled and it is safe to start • I stop and reassess if conditions change 	 <p>ENERGY ISOLATION</p> <p>Verify isolation and zero energy before work begins</p> <ul style="list-style-type: none"> • I have identified all energy sources • I confirm that hazardous energy sources have been isolated, locked, and tagged • I have checked there is zero energy and tested for residual or stored energy 	 <p>LINE OF FIRE</p> <p>Keep yourself and others out of the line of fire</p> <ul style="list-style-type: none"> • I position myself to avoid: <ul style="list-style-type: none"> - Moving objects - Vehicles - Pressure releases - Dropped objects • I establish and obey barriers and exclusion zones • I take action to secure loose objects and report potential dropped objects
 <p>BYPASSING SAFETY CONTROLS</p> <p>Obtain authorization before overriding or disabling safety controls</p> <ul style="list-style-type: none"> • I understand and use safety-critical equipment and procedures which apply to my task • I obtain authorization before: <ul style="list-style-type: none"> - Disabling or overriding safety equipment - Deviating from procedures - Crossing a barrier 	 <p>DRIVING</p> <p>Follow safe driving rules</p> <ul style="list-style-type: none"> • I always wear a seatbelt • I do not exceed the speed limit, and reduce my speed for road conditions • I do not use phones or operate devices while driving • I am fit, rested and fully alert while driving • I follow journey management requirements 	 <p>HOT WORK</p> <p>Control flammables and ignition sources</p> <ul style="list-style-type: none"> • I identify and control ignition sources • Before starting any hot work: <ul style="list-style-type: none"> - I confirm flammable material has been removed or isolated - I obtain authorization • Before starting hot work in a hazardous area I confirm: <ul style="list-style-type: none"> - A gas test has been completed - Gas will be monitored continually 	 <p>SAFE MECHANICAL LIFTING</p> <p>Plan lifting operations and control the area</p> <ul style="list-style-type: none"> • I confirm that the equipment and load have been inspected and are fit for purpose • I only operate equipment that I am qualified to use • I establish and obey barriers and exclusion zones • I never walk under a suspended load 	 <p>FIT FOR DUTY</p> <p>Be in a state to perform work safely</p> <ul style="list-style-type: none"> • I will be physically and mentally in a state to perform my assigned duties • I commit to not being under the influence of alcohol or drugs • I will inform a supervisor immediately if I or a co-worker may be unfit for work

SETTING THE STANDARD IN OIL AND GAS SAFETY



ENERGY SAFETY CANADA – EXAMPLE #1 ACCOUNTABILITY MODEL



ENERGY SAFETY CANADA – EXAMPLE #2 FAIRPLAY ACCOUNTABILITY MODEL

EXAMPLE #2 FAIRPLAY ACCOUNTABILITY MODEL

(For use following the completion of a detailed investigation)

Reward ●●● Coaching ●●● Discipline ●●●

Step #1 Behavior description	Did the team member go above and beyond the call of duty?		Were all procedures, expected practice and instructions followed?		Did the team member think they were doing things the right way?		If completing the same task, would others have acted in the same manner?		If the procedure or expected practice was a barrier to getting the job done, did the team member do it differently without reassessing the job?		Did the team member think there was some benefit for the company by doing the job a different way?		Did the team member vary from the procedure or expected practice to make it easier for them self?		Did the team member intentionally not to follow the procedure or expected practice without thinking or caring about the consequences?
	YES ↓	NO →	YES ↓	NO →	YES ↓	NO →	YES ↓	NO →	YES ↓	NO →	YES ↓	NO →	YES ↓	NO →	YES ↓
Behavior type	Exceptional behavior		Expected behavior		Error Unintentional (Slip, lapse or mistake)		Routine		Erosion Situational		Optimizing		Personal optimizing violation		Reckless violation
Work team consequence	Appropriate Recognition or reward in line with company practices.		Encouragement and recognition from the line manager.		Skills development and coaching in the use of correct procedures or expected practices.		Coaching on importance of understanding and following correct procedures.		Coaching on speaking up when procedures or expected practices cannot be followed and delaying the job until it can be completed properly.		Coaching on balancing work and time pressure with company values. Formal disciplinary action in accordance with the relevant workplace guideline.		Formal disciplinary action in accordance with the relevant workplace guideline.		Formal disciplinary action in accordance with the relevant workplace guideline.
When attributable to a gap in a process, procedure or management system, corrective action shall also be initiated by supervisor.															
Proceed to Supervisor (Step #2)															
Step #2 Supervisor behavior	Did the supervisor also exhibit exceptional behavior?		Does the supervisor lead by example by complying with procedures and instructions?		Did the supervisor fail to supervise work to ensure the task is completed in the required manner?		Did the supervisor allow non-compliant (poor) work practices to develop without correction?		Did the supervisor know the procedure or expected practice was a barrier to getting the job done and do nothing?		Did the supervisor permit shortcuts, for the sake of getting an outcome?		Did the supervisor overlook this behavior on this or previous occasions?		Did the supervisor condone the actions of the team member?
	YES ↓	NO →	YES ↓	NO →	YES ↓	NO →	YES ↓	NO →	YES ↓	NO →	YES ↓	NO →	YES ↓	NO →	YES ↓
Supervisor consequence	If the behavior is displayed by the whole team, appropriate recognition/reward is at the discretion of the line manager.		Encouragement and recognition if the whole team is working this way.		Counseling on supervisory accountability. Coaching in error identification and management.		Coaching on monitoring and enforcing procedures. Formal disciplinary action in accordance with relevant workplace guideline.		Formal disciplinary action in accordance with the relevant workplace guideline.		Formal disciplinary action in accordance with the relevant workplace guideline.		Formal disciplinary action in accordance with the relevant workplace guideline. Coaching on how to recognize and deal with such behavior earlier.		Formal disciplinary action in accordance with the relevant workplace guideline.
Responsibility	Supervisor/Manager		Supervisor		Supervisor/Manager		Supervisor/Manager		Supervisor/Manager		Supervisor/Manager		Senior Manager/HR/Legal		Senior Manager/HR/Legal

Based on work by Professor Patrick Hudson, Leiden University ("Meeting Expectations: A New Model for a Just and Fair Culture", SPE-111977)
NOTE: This is intended to be a guide to drive consistency and fairness, individual circumstances always need to be factored in.

LIFE SAVING RULES

2

ENERGY SAFETY CANADA

The information contained in this document is intended for general use only. Personnel using this document are responsible for ensuring that the applicable legislation and customer-specific practices, procedures and standards are complied with. If assistance is required, please contact an HSE representative.

6.0 ORIENTATION TRAINING AND COMMUNICATION

Training and communication at all levels is vital to the ongoing success of the FLINT Health, Safety, and Environmental Management System and includes specialized trade courses, orientations, safety courses, task training and the informal mentoring of all employees.

In addition to sending a continuously clear and consistent message about the culture, values and expectations regarding Occupational Health, Safety and the Environment at FLINT, training and communication ensures that FLINT Management provides support for our employees to achieve a high level of competence in their job. To ensure all employees are competent in all aspects of their designated work or tasks, training assessment and verification (Ex. testing) of skills is critical to ensuring a safe workforce.

By definition, worker competency is:

“Competent” in relation to a person, means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

Given the above workplace accepted definition of a competent worker, the hiring Manager/Supervisor must ensure that all employees have the appropriate training and are competent to perform their work safely in the environments they work in.

6.1 ORIENTATION

It is essential that all personnel receive a General FLINT Safety Orientation and Site-Specific Orientation prior to commencing work on all projects or facilities.

Safety Orientation is provided by FLINT to familiarize all new hire personnel with:

- Basic Information on Scope of Work
- Health and Safety Program Overview
- Safety Rules and Regulations
- Client’s Safety Training Requirements (if applicable)
- Hazards specific to the project or facility
- Workplace General Hazards
- Safety Incentive Program and Safety Targets (if applicable)

To assist in the conducting of a FLINT Safety Orientation an Employee Orientation Checklist has been prepared as a guideline. Prior to starting any orientation, this section should be reviewed, and all relevant topics should be discussed.

6.1.1 NEW EMPLOYEE ORIENTATION

All new employees and sub-contractors of FLINT or employees and sub-contractors that have not worked at a FLINT site or facility in the previous twelve (12) months must receive a new employee orientation before starting work.

Each employee will be required to complete the online orientation and print out the orientation card (or take a screen shot), for in-person orientations, the employee must sign an employee orientation checklist. A hardhat decal will also be issued at the completion of the orientation.

6.1.2 SITE SPECIFIC ORIENTATION

All employees must receive a site-specific orientation when reporting to a new site for work. This includes employees transferred from other businesses, activities or site within FLINT Energy Services. This Site-Specific Orientation will include the topics listed on the “Orientation Checklist” and must be developed for each project, worksite, and facility accordingly.

6.1.3 SHORT SERVICE WORKER PROGRAM

The purpose of this program is to ensure that new workers being introduced into FLINT Energy Services are given the tools and the opportunity to maximize their ability to understand and manage the risks and hazards in their new work environment.

The expectation is that this program will allow them to maximize their contribution to our successes and contribute to our Safety without Compromise.

The **Short Service Worker (SSW)** is a new or inexperienced worker or subcontractor with less than three consecutive months' experience in a job skill or position within FLINT.

6.1.4 VISITORS – SITE SPECIFIC ORIENTATION

Personnel visiting the site for one day or less will not be required to attend the site orientation; however, they must attend a short site briefing which will include evacuation procedures, smoking rules, personal protective equipment requirements, etc. An employee who has completed orientation while on the site must also accompany them at all times. All visitors must report to the office prior to entering.

6.2 SAFETY TRAINING

Employees on a work site must be trained to meet the hazards of that work site including the customer specific requirements for working safely. Employees of FLINT must receive ongoing formal and informal training based on the needs of the company, customers, and legislation and industry standards.

Safety Training is a condition of employment and it is the employee's responsibility to ensure that their training remains current.

Everyone who complies with identified safety standards and who aligns with our safety culture by continuous exposure to safety promotion, education, training and development can achieve acceptable safety performance.

Training requirements for each worker will be determined and identified by the supervisor(s). When safety training is required, the frequency of training shall be as follows:

- FLINT Safety Orientation – at commencement of each new project
- Field Level Hazard Assessment Program (FLHA) – as required
- Near Miss Reporting Program – as required
- Workplace Hazardous Materials Information System (WHMIS) Training 2015 – annually
- Aerial Work Platform Training – as required
- Designated First Aid Training (to designated personnel) – every 3 years
- Behaviour Based Safety– as required
- Workers Guide to Hand Signals for Directing Vehicles – as required
- Client General Site Orientation – as required
- Client Job Site Specific Orientation (CBT or Formal Classroom) – as required

6.2.1 Informal Training

Informal safety training is knowledge, skill instruction and understanding passed from one employee to another, from a supervisor to an employee, and peer-to-peer. This type of training is traditionally called "On-The-Job Training" and must be validated (where applicable) by training documentation, a competency assessment along with supervisor (mentor) and worker acknowledgement sign off.

Records of training must be kept in the operating area, in the employee file and retained as per company records retention policy.

6.2.2 Formal Training

Formal safety training is a structured instruction provided by a trainer for a specific skill, task or understanding. Training can only be provided by a certified instructor unless otherwise specified by the company.

Records of training must be kept in the operating area in the employee file and retained as per company records retention policy.

6.2.3 Job Site Specific Safety Training

Jobsite-specific training is conducted when an employee is hired, assigned new or different tasks or is moved to a new site or location.

The site supervisor, or designate, or a competent (trained/certified mentor) employee designated may conduct the training. It includes (but not limited to):

- Review of Safe Work Practices, Safe Work Procedures, Codes of Practices
- Identification of hazards and control measures (ex. JHA)
- Verification of understanding and employee competency

6.2.4 Trade Training

Employees will receive skill and technical training (where applicable) through recognized apprenticeship programs. Journeymen workers, instructing apprentices will enhance this technical training.

6.2.5 Supervisor Training

First line supervisors are in a key role ensuring a successful Health and Safety Program, and as such, they must promote the program and what it stands for directly to the workers. To accomplish this, the following training will be made available to all first line supervisors including:

- Safety Management System Manual
- FLINT Operational, Human Resources and Corporate Policies
- Fit For Duty Management
- Field Level Hazard Assessment Program (FLHA)
- Incident and Injury Claims Management
- FLINT Supervisor Training
- ACSA Leadership for Safety Excellence
- W.H.M.I.S. – Global Harmonization 2015
- First Aid (CPR / AED)
- Behaviour Based Safety
- Ongoing safety awareness training and education for all full-time supervisors
- Workers Guide to Hand Signals for Directing Vehicles
- Client General Site Orientation
- Client Job Site Specific Orientation (CBT or Formal Classroom)

Where Applicable:

- Transportation of Dangerous Goods (where applicable)
- H2S Alive
- Fall Restraint
- Rigging
- Confined Space Entry
- Isolation (Lock Out / Tag Out)
- Ground Disturbance Level II
- Aerial Work Platform Training – as required

6.2.6 Safety Resource Training

Safety resources are in a key role ensuring a successful Health and Safety Program, and as such, they must promote the program and what it stands for directly to the workers. To accomplish this, the following training will be made available to all first line supervisors including:

- National Construction Safety Officer (NCSO)
- Safety Management System Manual
- FLINT Operational, Human Resources and Corporate Policies
- Fit For Duty Management
- Field Level Hazard Assessment Program (FLHA)
- Incident and Injury Claims Management
- FLINT Supervisor Training
- ACSA Leadership for Safety Excellence
- W.H.M.I.S. – Global Harmonization 2015
- First Aid (CPR / AED)
- Behaviour Based Safety
- Ongoing safety awareness training and education
- Workers Guide to Hand Signals for Directing Vehicles
- Client General Site Orientation
- Client Job Site Specific Orientation (CBT or Formal Classroom)

Where Applicable:

- H2S Alive
- Fall Restraint
- Rigging
- Confined Space Entry
- Isolation (Lock Out / Tag Out)
- Ground Disturbance Level II
- Aerial Work Platform Training – as required

6.2.7 Management Training

Management is responsible for Health and Safety on all projects. To develop safety management skills, training includes the following:

- Safety Management System Manual
- FLINT HSE Orientation
- FLINT Supervisor Training
- Behaviour Based Safety
- Field Level Hazard Assessment (FLHA)
- W.H.M.I.S. 2015
- CSTS 2020
- Workers Guide to Hand Signals for Directing Vehicles
- Client General Site Orientation
- Client Job Site Specific Orientation (CBT or Formal Classroom)

Where Applicable

- Transportation of Dangerous Goods (where applicable)
- H2S Alive
- Fall Restraint
- Rigging
- Confined Space Entry

- Isolation (Lock Out / Tag Out)
- Ground Disturbance Level II

6.2.8 Worker Training

Training requirements for each worker will be determined and identified by the supervisor(s). When safety training is required, the training shall be as follows:

- Safety Management System Manual
- FLINT HSE Orientation
- Field Level Hazard Assessment Program (FLHA)
- W.H.M.I.S. – Global Harmonization 2015
- Behaviour Based Safety
- Workers Guide to Hand Signals for Directing Vehicles
- Client General Site Orientation
- Client Job Site Specific Orientation (CBT or Formal Classroom)

Where Applicable

- Transportation of Dangerous Goods (where applicable)
- First Aid (CPR / AED)
- H2S Alive
- Fall Restraint
- Rigging
- Confined Space Entry
- Isolation (Lock Out / Tag Out)
- Ground Disturbance Level II
- Aerial Work Platform Training – as required

6.2.9 TRAINING RECORDS RETENTION

Up to date records must be kept for all environmental and safety training including orientations for each worker. Each employee will be responsible to submit the information to Safety Passport Administrator for input into the Safety Passport, which identifies:

- Training requirements
- Worker
- Completed training to date
- Yearly schedule of required training
- Training records must be retained for a minimum of three years beyond completion of the project. Records will be available for company, client and government reviews, inspections and audits.

6.3 COMPETENCY EVALUATION CRITERIA

At FLINT the ability for a worker to perform a task successfully and efficiently supports the business we operate as well as the health and safety of the worker performing the task and the other workers on site.

Competencies are determined through skill assessment on the job, through interviews, and verification of training.

Below is the competence assurance process as defined by FLINT.

6.3.1 Training

Training is one piece of a competency assurance program and must not be overlooked or skipped. Workers must be trained to safely operate equipment and perform tasks set out by the employer. Training at a minimum must include operating instructions, proper use and limitations, hazards and risks, inspection and maintenance standards, associated tools and attachments, and required PPE. Training can be delivered in house by FLINT or acquired from a third party provider. All aspects of the training must be documented, a verification piece must be in place to ensure the Worker understand the training delivered to them, and a certificate or ticket must be issued.

Inside certain FLINT competencies a valid training ticket is listed as competency criteria that must be acknowledged.

6.3.2 Experience

Experience is an important piece of competency and cannot be rushed or replaced. Experience is practical contact with and observation of facts or events attached to the process/ tool or equipment operation. Inside certain FLINT competencies, minimum experience hours are required to be complete as part of the competency criteria.

6.3.3 Competency Evaluation

The competency assessment is administered on site by a person who holds valid training certification and a completed FLINT competency in that specific area of competency (example: to complete a skid steer assessment on a worker the assessor must hold a valid skid steer ticket and already be deemed competent through FLINT's process). Required competency assessments must be completed prior to a worker performing the task independently.

Competency assessments must be completed on FLINT personnel, by FLINT personnel. Competency assessments from other companies are not valid.

6.3.4 Administering the Evaluation Process:

A library of Competency assessment forms is available on Safety Passport. Once the supervisor has deemed the worker to have the appropriate training and experience a competency evaluation may be completed on the worker.

1. Print the appropriate competency evaluation form
2. Ensure a person with valid training and experience is the competency assessor.
3. Validate the workers training and experience.
4. Complete the evaluation providing detail in the comment sections.
5. Upload and enter evaluations into safety Passport for the worker using the key code \$afetyP@ss

Equipment	Training Required (Training validated through third party and/or internal certification)	Current Certification Required	Can experience replace training if validated through a resume?	Is a Competency Evaluation required?
AWP Below 80ft <i>*Considering Manufacturers Differences</i>	Yes	Yes	No	Yes
AWP Above 80ft <i>*Considering Manufacturers Differences</i>	Yes	Yes	No	Yes
Telehandler/Zoom Boom	Yes	Yes	No	Yes
Skid Steer	Yes	No	Yes	Yes
Fork lift	Yes	No	Yes	Yes
Crane - Boom/Picker	Yes	*Yes	No	Yes
Crane - Over Head	Yes	*Yes	No	Yes
Crane - Carry Deck	Yes	*Yes	No	Yes
Crane - Spider	Yes	*Yes	No	Yes
Crane-Side Boom	Yes	*Yes	No	Yes
Loader	Yes	No	Yes	Yes
All Terrain Vehicles (ATVs)	Yes	No	Yes	Yes
Yellow Iron (Dozer, Grader, Haul Truck, Excavator)	Yes	No	Yes <i>*AS per baseline Guidance</i>	Yes

** Denotes "BC Crane Certification" for work in BC*

Specialized	Training Required (Training with practical component)	Can experience replace training?	Is a Competency Evaluation required?
First Aid	Yes	No	No
H2S Alive	Yes	No	No
Fall Arrest	Yes	No	No
Confined Space Entry	Yes	No	Yes
Confined Space Monitor	Yes	No	Yes
Safety Watch - Spark/Fire/Bottle	Yes	No	Yes
RPE - APR 1/2 Mask, Full Face (w/ Fit Test)	Yes	No	No
RPE - SCBA/SABA (w/ Fit Test)	Yes	No	No
Basic &/or Advanced Rigging	Yes	No	No
Lead Abatement	Yes	No	No
Asbestos Abatement	Yes	No	No

6.4 SAFETY MEETINGS

6.4.1 Site Safety Meetings

A formal safety meeting shall be conducted at the site level monthly as a minimum. The material to be presented or reviewed at these meetings shall be prepared in advance and reviewed for accuracy, completeness and relevant to current operations. The safety meeting has two components.

1. An opportunity for two-way communication whereby, management can inform employees of safety concerns, new procedures, trends, training requirements etc.
2. An opportunity for employees to make recommendations or voice concerns to management.

6.4.2 Shift Start/Shift End

Shift Start meetings shall be:

- Held each morning prior to commencement of any work with all individual crews.
- Facilitated by the immediate supervisor of each crew.
- Reviewed by all new crew members who join throughout the day.
- Short in length
- Specific in nature to topics discussed, such as a review of the following:
 - Are all crew members fit for duty
 - Weather and site conditions
 - Work Permits
 - Hazards and conflicts involved with work to be performed that day
 - Equipment and manpower requirements

Shift End meetings shall be:

- Held at the end of shift each day
- Facilitated by the immediate supervisor of each crew
- Short in length
- Specific in nature to topic discussed, such as a review of the following
 - Was anybody injured today
 - Is your work area cleaned up
 - Any near misses to report
 - What problems did we have with the work plan
 - Collect FLHA's

These meetings are recorded on the Shift Start/End form. These meetings shall be forwarded to site management for review and filing.

6.4.3 Monthly Safety Meetings

Monthly Safety Meetings shall be held with all personnel, including project/facility office staff.

The primary objective of the monthly safety meeting is to introduce a focus safety topic or message that is relevant to the work activities.

Topics that shall be considered for discussion are:

1. Update safety committee initiatives.
2. A review of all injuries and incidents to determine areas requiring attention and for analyzing undesirable trends developing that require immediate corrective action.
3. A review of behaviour observations, safety inspections and hazard assessments that have been completed.

4. Information on incidents that have recently occurred in our industry that may apply to our operations.
5. Changes in government regulations that may have a profound effect on our operations or specific procedures currently in place.
6. Precautionary measures that should be instituted to deal with specific hazards associated with our work.
7. Results of recent safety audits and areas that need immediate attention. These audits may be internal, client or OH&S.
8. Obtain feedback and input on any unsafe conditions, practices or equipment in need of repair.
9. Goals and objectives of the Safety Program.
10. Monthly incident statistics, including the incident and injury frequency and severity rates and associated costs involved.
11. Incident and injury reporting procedures.
12. Specific training review, i.e.: fire extinguisher use etc.

Items discussed at our monthly safety meetings shall be recorded and minutes shall be produced for review by management and all the attendees.

All items raised at meetings that require follow up or further action, shall be given the highest priority possible to ensure they are promptly addressed.

6.4.4 Joint Health & Safety Committee Meetings

A safety committee will be set up as per the OH&S requirements.

Committee members shall consist of workers and management and meet to discuss:

- Incident Trends
- Inspection Trends
- Review/Solve outstanding safety meeting issues.
- Corporate Safety Topics

The purpose of committee meetings shall be to note and resolve safety issues, implement strategies of company on industry initiatives, and promote and encourage their participation within the safety program. Committee members shall regularly participate in safety audits and become an added resource that complements FLINT Safety Program.

The minutes of the health and safety committee meetings shall be recorded, and action items assigned where required.

The following is a brief listing of the duties of safety committee members:

1. Report all unsafe acts.
2. Report accidents and near misses.
3. Assist in the investigation of incidents/accidents when called upon.
4. Assist with safety audits when called upon.
5. Provide ideas and suggestions for improving work practices and procedures.
6. Work safely at all times and be a role model for other fellow workers.
7. Influence other workers to work safely by promoting and supporting FLINT Energy Service's safety program.
8. Encourage fellow workers to make suggestions and contribute to the safety program.

By encouraging a strong safety committee, issues concerning safety may be resolved prior to them becoming an issue and certainly before, they manifest themselves into an incident. This should not only promote a safer working environment but also allow workers a voice and encourage them to be constructive rather than just critical.

7.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

The following personal protective equipment (PPE) and clothing guidelines apply to all employees and contractors at FLINT worksites. Where possible, the hierarchy of controls must be used. Elimination/Substitution, Engineered Control (Isolation), Administrative Control and lastly Personal Protective Equipment (PPE) or what is considered the Last Line of Defence for worker protection from injury.

7.0.1 Personal Protective Equipment Use and Application Standard

The PPE itself must not endanger the employee. PPE requirements/use must be stated in the pre-job hazard assessment (FLHA, Safe Work Permit, JHA or applicable client safety documentation), and in the case of chemical handling reference the applicable Safety Data Sheet (SDS). Further, the employee must ensure that it complies with company rules and does not endanger him/herself at any point of a task. All PPE must be CSA (Canadian Standards Association)/ANSI (American National Standards Institute) approved and is separated into two categories of either 1) basic PPE and 2) job or site-specific PPE. FLINT will provide only specific PPE for the worksite, hard hats and safety eyewear. FLINT will provide job specialized PPE for protection from specific hazards, this includes (but not limited to) respiratory protective equipment, fall arresting equipment and special clothing. Specific PPE Safe Work Practices or procedure must be referenced in selection of PPE for the worksite, and FLINT employees will receive appropriate training in the use, care, maintenance and storage of the Personal Protective Equipment issued to them.

7.1 MANDATORY PERSONAL PROTECTIVE EQUIPMENT

It is FLINT policy that all employees on all projects/facilities wear the following certified equipment CSA or ANSI (where applicable), all workers shall wear an approved hard hat either type I standard or type II lateral impact. While operating an all-terrain vehicle an approved helmet must be worn and mechanics may wear approved bump caps when working under equipment. Close-fitting eyewear with side cover/side shields are to be worn (standard or prescription) when in designated work areas. Face shields and/or eyewear (double eye protection) is required during specific tasks (ex. grinding), chemical goggles are required when handling specific chemical substances (refer to SDS), and lastly, welding helmets are to be worn when there is a risk for radiant energy exposure. Footwear can be steel toed or composite boots with at least 6-inches of cover above the ankle, securely tied at all times during work. Class A Hearing protection in the form of ear plugs, earmuffs or both are required when noise levels are over regulatory provincial exposure limits. Fire resistant coveralls (Nomex III), Carhartt or leather aprons arm covers, additionally proximity suits (fireproof) and chemical resistant (disposable) coveralls are to be worn to protect limbs and body. Hand protection must be worn specific for the task and/or risk; general purpose, impact, cut, chemical heat resistant, documented the choice in applicable permits, tailgate meetings, or FLHA's.

Exception: The above list of all PPE does not have to be worn in specific trade applications (ex. welding helmet only, no hard hat needs or during specified high angle rescue work)

7.2 ADDITIONAL PERSONAL PROTECTIVE EQUIPMENT

For site specific activities, tasks or identified hazardous areas found in/on plants sites, leases, shops, chemical tank farms, or projects additional personnel protective equipment must be worn (where applicable) and as identified in a documented: FLHA, JHA, FLINT or Client safe work permit, prime contractor agreement, MSA, Safety Data Sheet (SDS), Safe Work Practice/Procedure or Code. The list identified (but not limited to) is as follows:

TOXIC ATMOSPHERE POTENTIAL

- Personal four head monitor (LEL/CO/H2S/O2)
- Self-Contained Breathing Apparatus (SCBA) c/w Full Face Supplied Air Mask + escape bottle
- Supplied Air Breathing Apparatus (SABA) c/w Full Face Supplied Air Mask
- Full or half Mask c/w particulate filter and/or organic vapor cartridge

PROCESS CHEMICAL EXPOSURE POTENTIAL

- Fireproof (proximity) suit

WORKSITE WATER BODY/RIVER PROXIMITY

- Lift Jackets/Flotation devices

HIGH ANGLE/FALL RISK POTENTIAL

- Fall restraint harness, lanyard, ladder control device

VISIBILITY CRUSH POTENTIAL/VEHICLE DIRECTING/CRANE GUIDANCE

- Hi – Vis clothing, vest, jacket

Where applicable training in the use of the above personal protective equipment (and associated fit testing), must be completed and documented in a competency certificate (process) prior to the worker using the equipment. Personal protective equipment need not be worn in offices, lunchrooms or washrooms/change rooms, or designated areas. Refer to work site specific criteria.

7.3 STANDARDS

Mandatory (or job specific) Personal Protective Equipment will meet the following standards:

MANDATORY EQUIPMENT	STANDARD - CSA / ANSI / FMVSS -
<ol style="list-style-type: none"> 1. Hard Hat Type I or (Standard, peaked, or full brim) 2. Hard Hat Type II or (Lateral Impact peaked, or full brim) 3. Helmet or (All-Terrain/Snowmobile, Motorcycle) 	<ul style="list-style-type: none"> ▪ CSA Standard CAN/CSA Z94.1-05 (r1998) or ANSI Standard Z89.1-2009 TYPE I ▪ Z94.1 – 05 Type II ▪ USA Federal Motor Vehicle Standard FMVSS 218 or BSI 6658:05 or Snell Memorial Foundation Standard M2005 ▪ CSA Standard CAN/CSA Z94.1-05
<ol style="list-style-type: none"> 1. Ear Plugs and/or 2. Earmuffs 	<ul style="list-style-type: none"> ▪ CSA Standard Z94.2-14 ▪ CSA Standard Z94.3-07
<ol style="list-style-type: none"> 1. Eye Wear (Standard Safety Eye Wear prescription side shields) or, 2. Sealed safety eye wear or, 3. Goggles 	<ul style="list-style-type: none"> ▪ CSA Standard Z94.3-07, or ANSI Standard Z87.1-2010 ▪ Goggles – Class 2A/2B/2C (refer to AB OHS Code Section 229)
<ol style="list-style-type: none"> 1. Footwear (Steel/composite toed, six-inch ankle cover, metatarsal protection) 	<ul style="list-style-type: none"> ▪ CSA Standard CAN/CSA Z195-M92 (R2000) or CSA Standard Z195-09 (CHECK Z 195-02) AND ASTM F2413-05)
<ol style="list-style-type: none"> 1. Face shield 2. Welding helmet (Approved shield, welding helmet) 	<ul style="list-style-type: none"> ▪ CSA Standard Z94.3-07, or ANSI Standard Z37.1-2010 Class 3/4/5/6
<ol style="list-style-type: none"> 1. Limb or Body Protection (FR Coveralls – Fire proximity suits) 	<ul style="list-style-type: none"> ▪ NFPA 2113
<ol style="list-style-type: none"> 2. Hand Protection (Impact/Cut/Chemical Resistant/Gauntlet) 	<ul style="list-style-type: none"> ▪ AS/NZS 2161.7.2:2005 ▪ ANSI ISEA 138 ▪ ANSI ISEA 105

The information contained in this document is intended for general use only. Personnel using this document are responsible for ensuring that the applicable legislation and customer-specific practices, procedures and standards are complied with. If assistance is required, please contact an HSE representative.

NOTE: medical exemption – toe caps/metatarsal protection/hazard assessment no sole penetration safety toe caps wearing does not create additional hazards

Equipment, not bearing a CSA/ANSI standard logo, may be used if it bears a NIOSH, OSHA or MSHA approval and if the Safety Supervisor has approved usage of the equipment.

7.5 HEAD PROTECTION-WORK SITE REQUIREMENTS, CARE AND CLEANING

- FLINT projects and facilities are designated as Hard Hat Areas. Employees entering the areas will be required to wear protective headwear, which meets the CSA Standard CAN/CSA Z94.1-05, Industrial Protective Headwear or ANSI Standard Z89.1-2009. SAFETY EQUIPMENT REQUIRED BEYOND THIS POINT
- SIGNAGE MUST BE posted conspicuously at all designated worksite/workplace entrances. For mechanical work (equipment repair) in a shop where workers are working underneath servicing equipment, a certified bump cap can be worn as an alternate protection against potential head injuries.
- Metal hard hats, visibly damaged (ex. cracked, gouged), and those with holes drilled in them do not meet with standard, and are not allowed on site.
- All hard hats must be worn correctly, as designed by the manufacturer and the harness not altered, resulting in the hard hat being worn incorrectly (ex. wearing the brim backwards).
- Trailer, office complex, and designated safe or employee break areas shall be exempt from hard hats to be worn
- CSA approved type II hard hats shall be worn when there is a potential for lateral force or impact from objects or equipment (ex. crane operation and suspended material strikes).
- Inspect the shell and harness for damage, tears, scratches or gouges. Discard the hard hat if there are visible cracks in the shell, hard hats are good for 2 – 5 years verify date of manufacture on the inside of the shell. Do not clean with abrasive or caustic chemicals
- Colour coded to assist in identifying FLINT organizational role
- Green - New Worker Blue – Experienced Field craft White – Supervision

7.6 EYE AND FACE PROTECTION-WORK SITE REQUIREMENTS, CARE AND CLEANING

- Employees shall be provided with and will be required to wear properly fitting eye and face protection.
- Face and eye protection shall be kept clean and in good repair. The use of this type of equipment with structural or optical defects shall be prohibited.
- Employees whose vision requires the use of corrective lenses shall be protected by goggles or spectacles of one of the following types:
 - CSA approved Spectacles where protective lenses provide optical correction.
 - Goggles that can be worn over corrective spectacles without disturbing the adjustment of the spectacles.
 - Tinted lenses shall not be worn in dimly lit areas, during meeting, or during hours of the workday that are dim or dark.
- Double eye protection (safety eyewear and a face shield or welding helmet) shall be worn to protect the worker from potential flying debris eye injuries (Refer to Safe Work Procedure for Cutting Welding Grinding).
- Inspect eyewear daily and ensure the arms are free of crack, nicks or damage and lens' are in good shape not excessively scratched. Clean with approved wipes and store in a safe place so as to prevent bending or break the glasses.

7.6.1 Class 1 Spectacles

- Class 1 A impact with side protection
- Class 1B impact resistant, with side and radiant protection

Understanding the variety of risks in the field, shops, yards, chemical storage areas, leases, plant site, or client locations specific safety eyewear will have to be worn to protect against material or debris impact.

Additional concerns around radiant energy exposure (welding/electrical arc flash) will dictate additionally

protection from a Class 1B Spectacle. Supervisors and workers will need to conduct a hazard assessment, document the risks and establish control measure including the selection of proper eyewear for the task, remembering if the hazards change through the task changes to safety eyewear may be required.

7.6.2 Sealed Safety Eyewear

Based either on the hazard (ex. potential flying debris), or client specific requirements sealed eyewear must be worn to protect the work from eye injury.

7.6.3 Chemical Goggles

When handling specific chemicals, key information from the manufacturer and or supplier of the product may prescribe the use of additional safety eyewear, (Refer to specific Safety Data Sheet)

7.6.4 Face Protection

Where there is a risk of facial injury, employees must wear appropriate face protection in addition to safety glasses. These activities include, but are not limited to:

- Welding, buffing, grinding and machining of metal
- Operation of a bench grinder
- Operation of a drill press
- Operation of a cut-off saw
- Operation of a chain saw
- Operation of a string-type weed trimmer
- Pressure-washing equipment

7.6.5 Radiant Energy Protective Equipment – Face Shielding

Welding and cutting operations present a serious potential hazard to employee's eyes therefore, specific Eye and Face protection in accordance with CSA Standard W177.2 Code for Safety in Welding and Cutting shall be provided.

- Helmets or face shields shall be used during all arc welding or arc cutting operations.
- Goggles or other suitable eye protection shall be used during all gas welding or cutting operations.
- All operators and attendants of resistance welding or resistance brazing equipment shall use transparent shields or goggles, depending on the particular job to protect their faces or eyes as required.
- Helmets and face shields shall be made of a material, which is an insulator for heat and electricity. Helmets, shields and goggles shall not be rapidly flammable and shall be capable of withstanding sterilization.
- Helmets and face shields shall be arranged to protect the face, neck and ears from direct radiant energy from the arc.
- Helmets shall be provided with window lenses and filter cover plates designed for easy removal.
- All parts shall be constructed of a material, which will not readily corrode or discolor the skin.
- Goggles shall be ventilated to prevent fogging of the lenses as much as practical. Special goggles to be worn when handling chemicals.
- Cover lenses or plates shall be provided to protect each helmet, face shield, or goggle filter lens or plate.
- All glass for lenses and cover plates shall be tempered, and substantially free of striations, air bubbles, waves and other flaws. Except when a lens is ground to provide proper optical correction for defective vision, the front and rear surfaces of lenses and windows shall be smooth and parallel.

- Lenses shall bear some permanent distinctive marking by which the source and shade may be readily identified.
- Helmets and goggles shall be well maintained. They should not be transferred from one employee to another without being disinfected.

Use the guide below for the selection of the proper shade numbers. These recommendations may be varied to suit the individual's needs.

WELDING OPERATION	SHADE IN NUMBERS
Soldering:	2
Torch Brazing	3 or 4
Oxygen Cutting:	
Up to 1 inch	3 or 4
1/8 inch to 1/2 inch	4 or 5
6 inches and over	5 or 6
Gas Welding:	
Up to 1/8	4 or 5
1/8 inch to 1/2 inch	4 or 5
1/2 inch and over	6 or 8
Shielded Metal Arc Welding:	
1/16, 3/32, 1/8, 5/32 inch Electrodes	10
3/16, 7/32, 1/4 inch Electrodes	12
5/16, 3/8 inch Electrodes	14
Gas Tungsten – Arc Welding:	
Non-Ferrous	11
Ferrous	12
Plasma-Arc Welding and Cutting	12
Atomic Hydrogen Welding	10 to 14
Carbon Arc Welding	14
Air Carbon-Arc Welding	14

Note: In gas welding or oxygen cutting where the torch produces a high yellow light, it is desirable to use a filter or lens that absorbs the yellow or sodium line in the visible light of the operation.

7.7 HEARING PROTECTION WORK SITE REQUIREMENTS, CARE AND CLEANING

Employees shall not be exposed to noise more than the Occupational Exposure Limits set in the table illustrated later in this section. This may be accomplished (in order or preference) by:

1. Elimination/Substitution
2. Engineering Controls
3. Work Practices/Administrative Control
4. Providing personal hearing protection

There are three (3) types of recognized hearing protectors available for use in effectively reducing noise exposure:

- Ear plugs
- Earmuffs
- Helmets (ATV / Motorcycle)

The threshold for conducting a noise exposure assessment are as per provincial regulatory requirements to ensure noise is assessed before the occupational exposure limit is exceeded. In most instances, earplugs are acceptable hearing protection however, when the ambient noise level is at or above 110 DbA. double hearing protection is required – ear plugs and muffs. Employees will be fit tested for the hearing protection being used.

- Ear plugs are designed as one time use, getting dirty if handled frequently, discard each set after use.
- It is suggested to wash your hands before inserting plugs into your ears, for a better fit lift your ear outwards and insert rolled up plug slowly into ear canal.
- When using earmuffs for hearing protection, special care must be given to ensure they are disinfected before being issued to other employees.
- All hearing protection devices issued must comply with CSA Standard Z94.3 -07 Hearing Protection
- Employees are to be informed of the hazards associated with exposure to noise and the purpose and limitations of protective hearing devices. The wearing of this equipment will be mandatory.

Occupational Exposure Limits for Noise

Sound Level (dBa)	Maximum Permitted Duration
82	16 hours
83	12 hours 14 minutes
84	10 hours 4 minutes
85	8 hours
88	4 hours
91	2 hours
94	1 hour
97	30 minutes
100	15 minutes
103	8 minutes
106	4 minutes
109	2 minutes
112	56 seconds
Greater than 115	0

Selection of Hearing Protection

Maximum Equivalent Noise Level (dBA)	CSA Class of Hearing Protection	CSA Grade of Hearing Protections
<90	C, B or A	1,2,3, or 4
<95	B or A	2,3, or 4
<100	A	3 or 4
<105	A	4
<110	A earplug + A or B earmuff	3 or 4 earplug + 2,3,or 4 earmuff
> 110	A PLUG + A or B earmuff and limited exposure time to keep sound from reaching the worker's eardrum below 82dBA	3 or 4 earplug + 2, 3, or 4 earmuff and limited exposure time to keep sound reaching the worker's eardrum below 85dBA

7.8 FOOT PROTECTION WORK SITE REQUIREMENTS, CARE AND CLEANING

Employees are required to wear sturdy work boots, which will provide adequate protection against injury to the feet. Employees must purchase and wear boots, which meet the CSA Standard CAN/CSA Z195.1-M92 (R2000), or CSA Standard Z195.1-09 Protective Footwear criteria (i.e. steel or composite toe protection, sole penetrating protection and ankle protection).

Foot protection worn should be applicable to the work environment exposure meaning in extreme cold protective foot where should be insulated (winter work boot), protecting the worker from frostbite and material/equipment impact (steel or composite toecap).

Additional foot protection with required CSA certification allowed would be rubber or chemical resistant boots, and boots with metatarsal protection (internal or external) for high risk impact work such as fabrication/steel work.

Protective footwear should be 6 inches high and cover the ankle. Footwear should be securely tied at all times during work. Boots should be replaced if worn out where there is evidence of cracks, cuts or holes in the material, toecap is exposed, and sole no longer has traction and is worn smooth.

7.9 HAND PROTECTION, CARE AND CLEANING

FLINT workers shall wear gloves designed for the identified hazard and task being conducted at the work site (ex. Impact gloves when handling pipe) to eliminate or reduce the potential hand or finger crush, abrasion or cut. Specialized gloves for specific trades and/or activities shall be worn such as heat resistant welding, electrical arc flash, or chemical nitrile. Hand protection inclusive of cut and impact resistance is certified under ANSI ISEA 138/ ANSI ISEA 105. Hand protection must be worn specific for the task and/or risk; impact and/or cut resistant gloves are mandatory (ex: handling equipment and materials impact gloves, cutting cables working with sharp edges cut resistant).

Hand protection should be inspected prior to each use ensuring the material is intact, free of cuts, chemical saturation, abrasion, loss of impact cover (protection). Discard gloves when the material is damaged to the point that there is a risk of injury. Chemical gloves may be washed or rinse with a solution of water/soap to remove most chemicals, caution on flushing chemical residues down a sink drain into municipal sanitary sewers (prohibited). Leather or synthetic gloves may not be cleaned effectively with soap and water, vinegar, and water, avoid harsh chemicals that will damage the glove material.

7.10 LIMB AND BODY PROTECTION COVERALLS

Protective Clothing

Some tasks performed may require the use of various types of protective clothing to protect the worker from hazardous material contact, including chemicals, other materials, and fire. If protective clothing is required, (such exposure to fire/explosion or harsh chemicals), FLINT or the client will provide it and the worker is expected to use it in the manner intended. Fire resistant coveralls (FR fiber & threads or chemically sprayed on fire retardant), fire proximity suits, cotton coveralls, heat resistant aprons arm gauntlets, are some of examples of protection clothing worn by workers. Cleaning of the soiled clothing can be safely done in a general washing-machine cycle (ex. cotton or FR coveralls) but over time, the fire resistance of the garment will deteriorate. Any protective clothing that is ripped, torn, has holes, or chemically damaged should be removed from service and disposed of immediately, as it will no longer be effective in protecting the worker from injury incident.

Hooded pull over (hoodies) are not recommended to be worn during worksite activities. All outerwear must be (FR) Fire-Resistant Rated and hoodie drawstrings must be removed.

CLIENT BAN HOODIES due to restricting visibility and potential for entanglement in rotating equipment, always follow the higher standard as dictated by clients and/or hazard – risk assessment.

7.11 ADDITIONAL PERSONAL PROTECTIVE EQUIPMENT

For site specific activities, tasks or identified hazardous areas found in/on plants sites, leases, shops, chemical tank farms, or projects additional personal protective equipment must be worn (where applicable) and as identified in a documented: FLHA, JHA, FLINT or Client safe work permit, prime contractor agreement, MSA, Safety Data Sheet (SDS), Safe Work Practice/Procedure or Code. The list identified (but not limited to) is as follows:

TOXIC ATMOSPHERE POTENTIAL

- Personal four – head monitor (LEL/CO/H2S/O2)
- Self-Contained Breathing Apparatus (SCBA) c/w Full Face Supplied Air Mask + escape bottle
- Supplied Air Breathing Apparatus (SABA) c/w Full Face Supplied Air Mask
- Full or half Mask c/w particulate filter and/or organic vapor cartridge

PROCESS CHEMICAL EXPOSURE POTENTIAL

- Fireproof (proximity) suit

WORKSITE WATER BODY / RIVER PROXIMITY

- Life Jackets/Flotation devices

HIGH ANGLE/FALL RISK POTENTIAL

- Fall restraint harness, lanyard, ladder control device

VISIBILITY CRUSH POTENTIAL/VEHICLE DIRECTING/CRANE GUIDANCE

- Hi – Vis clothing, vest, jacket

7.12 RESPIRATOR AND BREATHING AIR REQUIREMENTS

Types of Protection

Particulate Filter Respirator

A particulate (mechanical) filter respirator is designed to give protection against particulate contaminants, such as non-volatile dusts, mists or metal fumes. The items to be concerned with in the selection of this type of respirator are resistance to breathing caused by the filtering element, the fit of face piece to various sizes and shapes of faces and the actual size of fineness of the particulate to be filtered out.

This type of respiratory device does not offer protection against oxygen deficiency, carbon monoxide, gases or vapors. Specialty adaptable particulate filters are available for usage with chemical cartridge respirators where suspected air contaminants requires a multiple purpose type respirator. Depending on the job site requirements the selection and use of a particulate filter may vary from a P100 - (which filters out 99.9% of particulate 0.3 microns or larger), to an industrial respirator with valve N95 - (which filters out 95% of the ambient particulate 0.3 micron or larger in an area).

Organic Vapor Cartridge

Chemical cartridge respirators normally consist of a face piece (half-face; mouth and nose or full-face; mouth, nose and eyes) connected directly to one or two containers of chemicals.

- Various chemicals are used in the cartridges and each chemical is specific as to which air contaminate will be removed.
- Chemical cartridge respiratory usage is for non-emergency situations and is not to be used for atmospheres, which have an oxygen deficiency.
- Chemical cartridge respirators are designed for atmospheres, which are harmful only after prolonged or repeated exposures to air, contaminate.
- Replacement of chemical cartridges depends on activity during use, concentration of air contaminants, and the type of chemical cartridges being used (multi-purpose chemical cartridges generally do not last as long as single purpose chemical cartridges).

There are three important rules that apply to the selection of chemical cartridge respirators:

1. They should not be used for exposure to harmful air contaminants which cannot be detected by odor.
2. They should not be used as protection where air contaminants is highly irritating to the eyes.
3. They shall not be used for protection against air contaminants which are not effectively controlled by chemical cartridges used regardless of concentration.

Gas Masks

The gas mask type air-purifying respirator consists of a face piece connected to a chemical canister by a flexible hose. Again, the chemicals used are specific as to which contaminants are removed from the breathable air.

- Canister type gas masks are generally used as an emergency respiratory device in atmospheres immediately hazardous to life. They shall not be used where oxygen deficiency or carbon monoxide is a suspected hazard such as in firefighting.
- Generally, gas mask-type respirators shall not be used in areas where air contaminants is in high concentrations (above two percent of total air volume).

Care and Maintenance of Respirators Procedure

Respirators shall be regularly collected, cleaned, and disinfected. Those that are issued for the exclusive use of one worker shall be cleaned after each day's use if necessary. Those respirators used by more than one individual shall be cleaned and disinfected after each use. The following is a guide for an effective cleaning program:

Remove any filters, cartridges, or canisters. **Do not reuse if their effectiveness no longer meets requirements means by example:** "All (FDA-cleared) N95 respirators are labeled as "single use", disposable devices". If your respirator is damaged, soiled, or breathing through the respirator becomes difficult, you should remove the respirator, dispose of it properly, and replace it with a new respirator. Refer to the Respiratory Code of Practice for additional details on training, use, care and maintenance of respiratory equipment.

- Wash face piece and any breathing tubes or hoses in approved cleaner-disinfectant solution. Use a hand brush to facilitate the removal of dirt.
- Rinse completely in clean, warm water.
- Air-dry in a clean area.
- Clean other respirator parts or accessories as recommended by the manufacturer's specifications.
- Inspect valves, head straps, face piece and other parts for damage and/or deterioration.
- Insert new filters, cartridges, or canisters. Check seal to ensure seals are tight.
- Place in clean plastic bags or other approved storage containers.
- Storage shall be such as to protect the respirator against dust, sunlight, heat, extreme cold, excessive moisture, and damaging chemicals. In addition, storage should be such to prevent the distortion of the face piece or valves.

Pre-Use Inspection of Respirators

- All respirators shall be inspected routinely before and after each use. A respirator that is not routinely used, but is kept ready for emergency use, shall be inspected after each use and at least monthly to assure that it is in satisfactory working condition.
- Self-contained breathing apparatus shall be inspected monthly. Air cylinders shall be fully charged according to the manufacturer's instruction. It shall be determined that the regulator and warning devices function properly.
- Respirator inspection shall include a check of tightness of connections and the condition of the face piece, headbands, valves, connecting tube and canisters. Rubber or elastomer parts shall be inspected for pliability and signs of deterioration. Stretching and manipulating rubber or elastomer parts with a massaging action render them pliable and flexible and prevent them from taking a set during storage.
- A record shall be kept of inspection dates and findings for respirators for emergency use
- Frequent and regular inspection of work areas shall be done, and a record shall be kept as to the results of type and concentrations of air contaminants found.

Training

For safe use of any respirator, it is essential that the user be properly instructed in its selection, use and maintenance; both supervisors and workers shall be instructed by competent persons. Refer to the Respiratory Code of Practice for specific training and competency verification requirements.

7.13 FALL PROTECTION

FLINT Energy Service has a Fall Protection plan to provide maximum protection for all personnel when exposed to conditions where the possibility of falls exists.

The supervisor on site is responsible to enforce the use of the proper fall protection equipment when there exists the possibility of personnel falling 1.8 m or greater, or whenever there is an unusual possibility of injury if a worker falls less than 1.8 meters. Additionally, supervision must ensure that all fall protection equipment is stored in an area free from corrosive materials and protected from heat, flame, and abrasion.

Workers shall be trained, inspect the harness, lanyard, SRL – self retracting lifelines, or SRD self-retracting device prior to each use and ensure safety harness is properly adjusted to fit securely. Further the worker shall ensure the inspection is documented and the information issued to the supervisor as required.

GENERAL

- Workers operating any aerial work platform shall wear safety harness and lanyard, which is always attached to work platform.
- Workers fall protection equipment shall not be used for hoisting or for slings. Any equipment that has been used for any purpose other than personal protection shall be removed from service.
- Workers fall protection equipment shall be inspected yearly by a competent person and before each use by the user.
- Any time that fall protection equipment has been subject to an impact load from a fall, it shall be immediately removed from service and destroyed.

REMEMBER: TREAT ALL FALL PROTECTION EQUIPMENT WITH RESPECT. IT COULD BE YOUR LIFE THAT IS SAVED.

7.14 PREVENTATIVE MAINTENANCE PERSONAL EQUIPMENT, TOOLS AND EQUIPMENT

Preventative maintenance ensures that the tools and equipment that FLINT provides to their employees is in the safest condition possible.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Employees are responsible for cleaning, maintaining, and storing PPE in accordance with the training and instruction provided, inspecting the equipment before use.

TOOLS & EQUIPMENT

All operating divisions will have a well-planned and organized maintenance program for keeping personal protective equipment in safe working condition, according to original manufacturer's specifications. All equipment removed from service must be tagged "Out of Service" and rendered inoperable then disposed of appropriately.

RESPONSIBILITIES**All Employees**

Will inspect all equipment and tools before use and keep all equipment and tools in good repair. Remove from service any defective tool or piece of equipment.

HSE Department

Periodically inspect equipment and tools for defects. Verify the preventative process to ensure compliance with applicable maintenance policies.

Management/Supervision

Will ensure that equipment and tools are inspected, maintained and repaired in accordance with industry practice, legislated requirements, and manufacturer's specifications. Ensure that all equipment and tools are inspected before field assignment and are free of defects or deficiencies and are properly equipped according to FLINT policy. Remove from service any piece of equipment or tools that have been tagged "OUT OF SERVICE" or are otherwise defective. To perform a daily inspection of a vehicle or piece of equipment and tools the employee operates. Report any repairs or alterations required on the equipment and tools he or she operates. Leave all safety devices operative on equipment.

8.0 SAFE WORK PRACTICE

Safe Work Practices are written descriptions of how work is generally carried out and allow flexibility in how the work is accomplished. Due to the diversity of circumstances and situations within FLINT, the information contained in Safe Work Practices cannot be considered complete or applicable in every situation.

Supervisors and employees must refer to federal and provincial health and safety legislation, industry practices, customer policy and site-specific requirements to ensure that the work is accomplished safely.

8.0.1 Format

All FLINT **Safe Work Practice** will include standard (required) information as per the following format

- Application or Purpose
- Definitions (optional)
- Hazards
- Safe Work Practice or Precautions
- References

8.0.2 Development and Approval

FLINT will have generic Safe Work Practices developed and available on ClearNet (intranet). Site specific changes or additions will be made as required for operations. Practice should be developed for high-hazard work or where historical information, legislation, a Hazard Assessment or customer requirements dictate.

Employees, Supervisors, Management and HSE at FLINT will be involved in the development and/or review of the Safe Work Practice.

All Safe Work Practice will be developed using the standard FLINT Safe Work Practice format and are based on a documented jobsite hazard assessment (JHA).

8.0.3 Review and Approval

Employees, Supervisors, HSE and Joint Health and Safety Committees will review Safe Work Practice to ensure that they are complete with enough detail to ensure the safety of all workers, accurate and applicable. Reviews will be done as needed for specific projects or as a minimum every two (2) years.

Suggestions for additional Safe Work Practice or changes to the existing Safe Work Practice can be made using the Management of Change Process and applicable form.

8.0.4 Availability and Utilization

Safe Work Practice applicable to the work being performed will be available to all employees at the work site.

Safe Work Practice must be reviewed, signed, and dated by all workers associated with medium and high risk tasks at Shift Start Meetings before the start of any work using the Practice (where applicable).

Safe Work Practice can be used in job-specific training to instruct employees in their job duties and to verify employee competency and understanding.

8.0.5 Responsibilities

Employees, Contractors & Visitors

- Follow all the establish criteria described in a Safe Work Practice

Supervisors

- Complete a Hazard Assessment to determine the need for a specific Safe Work Practice.
- Ensure that the Safe Work Practice and associated Procedures are available for review at the work site. Each person involved in the task must review, sign and date.
- Ensure that all the requirements in a Safe Work Practice(s) are carried out (followed) in accordance with the applicable SWP.

8.1 CODE OF PRACTICE

FLINT has developed key documentation for critical work called a Code of Practice and as such the information, details and procedure are set out to protect workers from injury or incident. A Code of Practice establishes a set of guidelines, practice, or procedure that must be followed.

When critical work is to be done that has an established, written Code of Practice, (ex. Confined Space Entry) all employees, contractors, and supervision shall print, (for access to information and printed files your area Safety professional and/or FLINT Supervisor where applicable), for the required Code of Practice to review the details, and implement the following:

- Complete - required safety/hazard assessment,
- Ensure - all required equipment and personnel are ready and available at point of task,
- Document - the information on a FLHA, associated FLINT and client safe work permits and,
- Communicate - the activity to other personnel in the immediate area (SIMOPS – Simultaneous Operations), as well as client personnel and rescue teams (where applicable – ex. high angle work).

8.1.1 Availability and Utilization

The Code of Practice applicable to the work being performed must be available to all employees at the work site.

Codes of Practice must be reviewed, signed, and dated by all workers associated with medium and high risk tasks at Shift Start Meetings before the start of any work using the Practice (where applicable).

Codes of Practices' can be used in job-specific training to instruct employees in their job duties and to verify employee competency and understanding.

8.1.2 Management of Code of Practice Work

When critical work is to be done that has an established, written Code of Practice, (ex. Confined Space Entry) all employees and supervision shall print the applicable Code of Practice review the details, and implement the:

- Required safety/hazard assessment,
- Ensure all required equipment and personnel are ready and available at point of task,
- Document the information on a FLHA, associated FLINT and client safe work permits and,
- Communicate the activity to other personnel in the immediate area (SYMOPS – Simultaneous Operations), as well as client personnel and rescue teams (where applicable – ex. high angle work).

8.1.3 Management of Code of Practice Work – Shift to Shift

For Code of Practice work that is not completed in the same shift and will carry on into the next shift, a complete and thorough hand off (read: sign off), of all documentation, along with a documented worker/supervisor meeting is required. If the (client) process allows the initial Safe Work Permit associated with the Code of Practice work may carry-over into the next shift.

However, if the Safe Work Permit expires at shift-end a new Safe Work Permit must be issued to the new crew and the process of safety/hazard assessment, required equipment/personnel, new Field Level Hazard Assessment and communication to other personnel in the immediate area (SYMOPS), must be completed and documented on required forms.

Any applicable Code of Practice work not completed in the same day, and to be left for the next day, shall be identified and controlled with hazard ribbons, barriers and tags accordingly (ex. tank entry hatch left open on a confined space).

8.1.4 Completion of Defined Code of Practice Work

Upon completion of Code of Practice work supervision must review the work, area, and Safe Work Permit with all workers and then close off the permit with FLINT management and or client supervision.

8.1.5 Regulatory Requirements

As per Provincial Occupational Health and Safety Code(s), all workers involved Code of Practice work must comply with all the requirements and procedures in the Code.

Also, specific Codes of Practice work may have companion or other associated Codes of Practice that must be reviewed and understood by all workers completing the critical task, (ex. Confined Space work also requires the employer take into account the requirements for hot work).

Codes of Practice may be required for specified chemical handling as defined by OH&S, refer to applicable regulation in your jurisdiction.

8.1.6 Code of Practice Format

All FLINT **Codes of Practice** may include (but are not limited to) the following sections (information) or format (where applicable):

- Purpose
- Application
- Definitions
- Documentation
- Responsibilities
- Pre-Job Planning
- Hazard Assessment
- Procedures
- Job Plan
- JHA/Safe Work Permit/Rescue
- Specified PPE
- References

8.1.7 Review

Employees, Supervisors and Joint Health and Safety Committees will periodically review Safe Work Practice to ensure that they are complete with enough detail to ensure the safety of all workers, accurate and applicable. Each person involved in the task must review, sign and date.

Suggestions for additional Codes of Practice or changes to the existing Codes of Practice can be made using the Change Management Process and applicable form.

9.0 SAFE WORK PROCEDURES

A Safe Work Procedure is a written step-by-step description of how a particular task is to be performed that is used during performance of the work by the person performing the work (or by two people doing the work, one reading and one doing). Examples of procedures include: equipment start-up or shut-down procedures; normal operating procedures; written operating instructions; pre-use checklists, brakes and steering, abnormal operating procedures, emergency procedures, special test procedures, maintenance procedures, preventive maintenance procedures, construction installation procedures, calibration procedures, hydrostatic test procedures, and inspection procedures.

9.01 Format

All FLINT Safe Work Procedures will include standard (required) information as per the following format (additional information may be included based on hazard/risk assessment, and/or client requirements):

- Purpose
- Requirements (optional)
- Documentation (optional)
- Responsibilities
- Hazard & Hazard Control Measures
- Safe Work Procedure
- References

9.02 Development and Approval

Each worksite or location in FLINT will have specific Safe Work Procedures operations. Procedures should be developed for high-hazard work or where historical information, legislation, a Hazard Assessment or customer requirements dictate.

Employees, Supervisors and Management at FLINT will be involved in the development and/or review of these Safe Work Procedures.

All Safe Work Procedures will be developed using the standard FLINT Safe Work Procedure format and are based on a documented jobsite hazard assessment.

9.03 Review and Approval

Employees, Supervisors and Health and Safety Committees will review Safe Work Procedures to ensure that they are complete, accurate and applicable. Reviews will be done as needed for specific projects or as a minimum every two(2) years.

Suggestions for additional Safe Work Procedures or changes to the existing Safe Work Procedures can be made using the Safe Work Practices/Procedures Change Process and applicable form.

9.04 Availability and Utilization

Safe Work Procedures applicable to the work being performed will be available to all employees at the work site.

Safe Work Procedures must be reviewed, signed, and dated by all workers associated with medium and high risk tasks at Shift Start Meetings before the start of any work using the procedure (where applicable).

Safe Work Procedures can be used in job-specific training to instruct employees in their job duties and to verify employee competency and understanding.

9.05 Responsibilities

Employees, Contractors & Visitors

- Follow all established steps described in a Safe Work Procedure.

Supervisors

- Complete a Hazard Assessment to determine the need for a specific procedure
- Ensure that the Safe Work Procedures and associated practices are available for review at the work site. Each person involved in the task must review, sign and date.
- Ensure that all the steps in a Safe Work Procedure are carried out (followed) in accordance with the applicable Procedure.

9.06 Deviations

Safe Work Procedures do not allow for flexibility. Deviations from Safe Work Procedures require a written hazard assessment JHA or FLHA detailing the changes and must be documented using the Internal Request for Deviation Form.

All deviations must be signed off and approved, according to the Risk Matrix.

10.0 SUPPLY CHAIN MANAGEMENT POLICY

FLINT has a detailed Sub-Contractor and Vendor Management Policy in place that takes into account the following elements of:

- General (policy description)
- Definitions (Sub-Contractor/Vendor/Direct Service Provider)
- Management Accountability
- Sub-Contractor Pre-Qualification
 - Work and Operational Requirements
 - Site Specific Requirements
- Tendering and Selection Guidelines
- Service and Material Purchase Orders
- Third Party Management
- Sub-Contractor and Vendor Requisition and Order Process Flow
- Audits and Evaluation

Linked directly to the above Sub-Contractor and Vendor Policy is a solid set of safety performance criteria to assess the services provider(s) prior to hiring.

Once approved and hired the sub-contractor or vendor must ensure their worker safety performance, adherence to safe work policy, practices (Codes), procedures, and completion of daily hazard assessment/control is maintained through their own established safety program.

Alternatively, the sub-contractor or vendor team may operate under the FLINT Safety Management System, participating in daily shift start/end meetings, completing FLHA, reviewing safe work practices, procedures or codes directly within FLINT.

In some instances, a sub-contractor or vendor may operate under both HSE Management Systems creating duplicate documentation and reporting back into two safety management systems accordingly. Below is a breakdown of key safety requirements for all sub-contractors and vendors.

10.1 SUBCONTRACTOR AND VENDOR HEALTH, ENVIRONMENTAL & SAFETY STANDARDS

10.1.1 Prime Contractor

By definition - when two or more employers are involved in work at a worksite at the same time, the one designated as prime contractor directs the other employers and contractors and is responsible for taking steps to protect the workers from harm.

FLINT Work Sites

For identified worksite owned and operated by FLINT, FLINT is considered the Prime Contractor and we must ensure the safety all personnel, employees, contractors and vendors.

Client Work Sites

On a client's worksite, the client is the Prime Contractor and as such, FLINT is responsible for the delivery of safe and effective services that our company is contracted to perform. In some circumstances, a client will enter into a Prime Contractor Agreement documenting FLINT as the Prime Contractor on site and handing over key HSE responsibility for management and control of all contract workers on site.

10.1.2 **Policy**

FLINT strongly believes that in order to have the safest work sites possible, all involved companies must be equally committed to safety. FLINT is committed to utilizing only those sub-contractors who also share and display a genuine, pro-active, preventive attitude towards safety.

To verify this commitment, FLINT sub-contractors must meet the following minimum requirements before being allowed to work. Subcontractors will be asked to subscribe to ComplyWorks prequalification system and complete the requirements to become a qualified provider. In those cases where the subcontractor is not able to subscribe FLINT HSE department will review the information submitted and determine if the sub-contractor is at an acceptable level of risk. If the risk is seen as high, either the sub-contractor will not be allowed to work for us, or a direct supervision plan and depending on the scope of the work, a risk management plan may also be required.

Exceptions would include a sub-contractor providing a onetime specialized service who cannot provide all the information. At a minimum, they must meet the insurance and WCB certification requirements, and achieve a negative drug and alcohol test result (if testing is required by the clients). Lastly be directly supervised by FLINT and follow FLINT HSE policies and procedures.

If a subcontractor requires assistance to meet a required safety expectation not included in their safety program FLINT will use the Direct Supervision Plan to assist the subcontractor to meet the requirements.

10.1.3 **FLINT Environmental Health and Safety Requirements**

All sub-contractor, vendors and direct service providers (where applicable) will provide the follow HSE performance information to FLINT prior to hiring (reference Supply Chain Management Policy):

- Provide performance statistics for the previous three years:
 - Number of Fatalities, Lost Time Accidents, Recordable Injuries
 - Number of days lost
 - Hours worked for each year
 - Number of Vehicle Incidents and kilometres driven
- Provide evidence of insurance coverage:
 - Valid WCB account in appropriate province where the work is to be done. (clearance letter must be provided) Accounts with a surcharge above 10% are subject to further review.
 - \$2,000,000 MINIMUM insurance coverage – certificate of insurance must be provided.
- Provide certifications, if applicable.
 - Equipment Certification (i.e. Crane, Picker Unit)
 - Operator Certification (i.e. Crane, Picker Unit)
 - Trade Proficiency
- Provide evidence that the workers have passed a Drug and Alcohol test within the last three (3) months when testing is an access requirement of the client. Do not provide the actual test results, only evidence it was done and negative results were achieved.

- Provide evidence of a Safety Program that includes:
 - Preference will be given to those companies who have had their safety program audited externally (COR program).
 - All subcontractors will be required to submit a comprehensive Job Hazard Analysis for their scope of work prior to the start of any mobilization.
 - Specialized work – subcontractors, vendors or direct service providers (DSP's) will ensure that they have detailed safe work practices, procedures or Codes of Practice documented, current and available on site when work is conducted
 - Provide evidence of appropriate safety training (ex. WHMIS – GHS, TDG, H2S, First Aid CPR / AED, Fall Protection etc.)
- A documented post job safety performance review will be done by FLINT and shared with the sub-contractor.
- The sub-contractor will participate in site orientations, safety meetings (all types) and Hazard Assessments.
- Comply with the expectations of the Project and/or Facility Specific Safety Plan

10.1.4 Personal Protective Equipment

Subcontractors will ensure that employees on a FLINT worksite comply with the Personal Protective Equipment requirements of that work site, as well as the minimum PPE standards expected by the subcontractor, vendors or direct service providers. Subcontractors will provide their own personal protective equipment and ensure that PPE is in good and serviceable condition.

The client and/or FLINT may provide specialized PPE (ex. fire proximity suits), which will be determined during the subcontractor sign up process.

10.1.5 Incident Reporting

Subcontractors will report all incidents to FLINT as required under the FLINT SMS and completed to the standards documented under the Section 15 Incident and Injury Claims Management.

All incidents, no matter how minor MUST be reported to the FLINT supervisor IMMEDIATELY and Claims Management (Corporate HSE Program Coordinator) where applicable

DEFINITIONS

Near Miss: An incident that it does not result in injury or damage. No matter how minor they are incidents should be reported to supervision so action can be taken to prevent a recurrence resulting in a serious injury. Many times the difference between an incident and a near miss is just a fraction of a second in timing or a fraction of an inch in distance. Next time the distance may not be there.

First Aid: One time treatment and subsequent observation of minor scratches, cuts, burns, and so forth, which do not ordinarily require medical care, even though provided by a physician or other registered professional personnel.

Medical Aid: A medical treatment case is any injury that requires treatment by a physician or medical professional. Medical treatment does not include first aid. (See chart below for further clarification on classification).

FIRST AID	MEDICAL AID
Hospitalization for observation Negative X-Ray (no fracture found)	Positive X-Ray fracture including hairline fracture.
Tetanus	Strain/Fracture immobilization i.e. cast, sling or other means of immobilization of body part
Bruise-cold packs	Bruise-extraction of fluid/drainage of blood
Strain-limited use/hot/cold packs	Removal of dead or damaged tissue
Change of dressing	Use of medical procedure to remove particle from the eye
Application of antiseptics	Any prescription related to injury treatment of infection arising out of an injury
Single dose of prescription medication for pain relief, prevention of infection or non-prescription medication	

Lost Time Incident: Lost time injuries include fatalities, permanent total disabilities, permanent partial disabilities, and lost workday cases resulting from work related injuries. A lost time injury is any work related injury that renders the injured person temporarily unable to perform any regular job or restricted work activity on any normally scheduled workday after the day on which the injury occurred.

Modified Work: A temporary assignment(s) within an employee’s abilities, knowledge and skills. These positions are developed using the employee’s abilities/restrictions as determined by the employee’s treating physician. They may also include responsibilities and tasks taken from the employee’s regular job, when the employee cannot perform full duties or work a full day.

10.1.6 REVOCAION OF CONTRACTOR APPROVAL

If FLINT supervision or management identifies and documents any non-compliance with the subcontractors’ health, safety, environmental (HSE) program or the FLINT Safety Management System, the subcontractor will be notified verbally and in writing that they are in non-compliance with HSE Policy. The subcontractor will be informed that non-compliance is grounds for termination of the contract.

If no corrective action is taken after written notice is provided by FLINT Management or imminent danger exists, a stop work order will be issued and all work performed by that subcontractor within FLINT MUST cease.

The subcontractor and FLINT Management will conduct a site meeting to address the issue. Meeting minutes must be taken and continued non-compliance will result in contract termination.

ATTACHMENTS:

- Form 10A Subcontractor Month End Safety Report
- Form 10B Subcontractor Safety Questionnaire
- Form10C Subcontractor Safety Performance
- Form 10D Direct Supervision Plan
- Form 10F Subcontractor Work Evaluation

11.0 BEHAVIOUR BASED OBSERVATION PROCESS

The FLINT Behaviour Based Observation (BBO) program focuses on the behaviours attributed to the immediate and basic causes of incidents within FLINT. The process for the successful utilization of our Behaviour Based Observation (BBO) Program is the evaluation of peers by peers and includes recognition and feedback on either SAFE or AT-RISK BEHAVIOURS. Training on the correct application of the BBO program and process will be provided to all project personnel as part of the orientation. The intent is to proactively recognize those safe behaviours (ex. wearing double eye protection while grinding) that are used at our work site by our employees and subcontractors. Or to modify those behaviours that would be considered an inappropriate risk (ex. working over 1.8 meters above the ground without required fall protection/restraint harness/lanyard), as determined by using the FLINT Risk Matrix/Policies and Safe Work Practices. Behaviours, like habits, are not easy to change, the Behaviour Observation program is designed to support & encourage safe behaviours thereby leading to a safer workplace with reduced or zero incident.

BEHAVIOUR BASED OBSERVATIONS

- Observations are workers observing and looking out for each other.
- The program becomes most effective in reducing incidents and improving safety performance if people from every sector of our operations participate.

BEHAVIOUR OBSERVATIONS DO IMPROVE SAFETY AND TARGETS SAFE BEHAVIOURS

- Increasing awareness and communication.
- Improve/enhance working conditions and overall personal behaviour (or work habits).
- When identifying and complimenting people on the things they are doing safely, it increases the chances of the safe behaviour being repeated by all workers on site (ex. wearing safety eyewear when entering plant operational area).

COMPLETING THE OBSERVATION PROCESS

Prior to initiating a Behaviour Based Observation program all employees need to decide to participate in the program and set goals for yourself and/or your crew. The completion of a BBO and support of the overall program is based on a minimum requirement of one BBO per worker per week. The program is designed around a meaningful safety conversation between workers, on a frequent (daily basis) to ensure the prevention of injury and incident at the workplace. BBO's can be completed at anytime and anywhere in the workplace from administrative areas through to shop, plant, or lease activities within FLINT. Supervision and Management will set BBO targets or goals and will compile all observation completed, to analyze any trends that could lead toward a work system failure or behaviour before an incident happens.

There are five key steps to completing a successful BBO, STOP – COMMUNICATE – OBSERVE – ACT – REPORT

1. **STOP** - Complete a quick hazard assessment of the area, ensure you are in a position out of the work area and not a new risk for the workers, take a minute or two to observe someone or a crew performing a task.
2. **COMMUNICATE** – Following commencement of a Behaviour Base Observation at a safe point of task, talk to the workers you are observing.

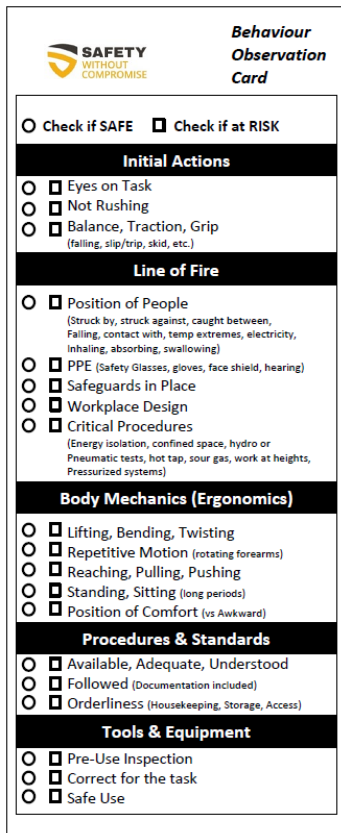
Inform them of your activity (no surprises, no hiding behind objects), and ensure you take care of your own personal safety assessing the area for hazards, (stay out of the bite), do not create additional hazards for the workers by being close by!
3. **OBSERVE** - Use the Observation Card (checklist) as a guide, enter the observations using the mobile app.

Look for Safe or At-Risk Behaviours (select only one or the other on each line of the 19 behaviours), the same BBO entry can be used for multiple Safe or At-Risk Behaviours observed for the same task.
4. **ACT** - Provide feedback on what you observed.

- Talk with the person(s) that you observed as soon as possible, and it is essential that the conversation be positive and constructive; this is not a lecture and as a two-way conversation is very important.
- Comment on the safe or at-risk conditions / behaviours you have observed, thereby ensuring an effective conversation on what you observed.
- When addressing an “at-risk” situation or behaviour, it is often advisable to ask the person if they can identify the solution. If they cannot, then be constructive and remember that intent of the program is to improve safety for everyone.

5. **REPORT** - Complete the Behaviour Observation through forms on a mobility device or on a BBO Card filling in the details on the front and back of the card, if entering on a card the card detail must be then entered into the mobile system.

The mobile app and program currently called Lifeguard is in place to electronically capture all workers At Risk or Safe Behaviours on FLINT tablets, cell phones, or computers. Once the data is entered and uploaded into Lifeguard the information is assessed, trended, and reported to management at a minimum monthly.



SAFETY WITHOUT COMPROMISE **Behaviour Observation Card**

Check if SAFE Check if at RISK

Initial Actions

- Eyes on Task
- Not Rushing
- Balance, Traction, Grip (falling, slip/trip, skid, etc.)

Line of Fire

- Position of People (Struck by, struck against, caught between, Falling, contact with, temp extremes, electricity, Inhaling, absorbing, swallowing)
- PPE (Safety Glasses, gloves, face shield, hearing)
- Safeguards in Place
- Workplace Design
- Critical Procedures (Energy isolation, confined space, hydro or Pneumatic tests, hot tap, sour gas, work at heights, Pressurized systems)

Body Mechanics (Ergonomics)

- Lifting, Bending, Twisting
- Repetitive Motion (rotating forearms)
- Reaching, Pulling, Pushing
- Standing, Sitting (long periods)
- Position of Comfort (vs Awkward)

Procedures & Standards

- Available, Adequate, Understood
- Followed (Documentation included)
- Orderliness (Housekeeping, Storage, Access)

Tools & Equipment

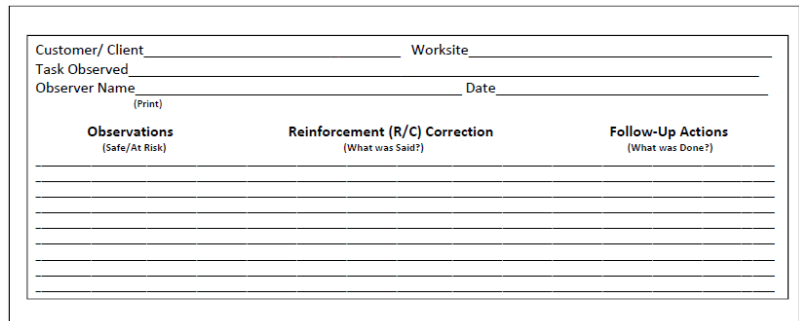
- Pre-Use Inspection
- Correct for the task
- Safe Use

CHECKLIST SIDE OF BBO CARD

- When completing the checklist, only check off the behaviour that applies to the task. If they do not apply, leave them blank. Do not check both Safe and At Risk on the same observation line.
- Multiple observations can be entered into the mobile app (ex. Initial Action – Eyes on Task) all five categories and 19 observations can be populated, supporting comments for each observation must be entered to validate the observation.

OBSERVATION BOXES in the APP OR BACK OF THE BBO CARD

- **WORKSITE DETAILS** - Ensure the Customer/Client, Worksite, Task Observed, Observers Name and Date and completed. No other name appears on the Behaviour Observation Card other than the name of the person doing the observation.
- **OBSERVATION SECTION** - Document the Safe or At-risk Behaviours that were observed. (Ex. personal protective equipment worn by all workers or tag lines was used when hoisting).
- **REINFORCEMENT (R/C) CORRECTION** - Is a summary of the conversation that took place, and it does not have to be word for word.
- **FOLLOW-UP ACTION** - Needs to be filled-in if there is something that needs to be done after the Behaviour Observation is complete, such as addressing the situation at a tailgate or safety meeting.



Customer/ Client _____ Worksite _____
 Task Observed _____
 Observer Name _____ Date _____
 (Print)

Observations (Safe/At Risk)	Reinforcement (R/C) Correction (What was Said?)	Follow-Up Actions (What was Done?)

BENEFITS OF THE OBSERVATION PROGRAM

- The Observation Program promotes “Safety is a shared responsibility”.
- As each of us commit to the Observation Program, we take a giant step towards ensuring the safety and well-being of our fellow workers. As we increase our ability to work together, communicate more effectively and frequently peer to peer, our progress to a Zero Injury culture is achievable. There is no doubt that the Observation Program reduces incidents.

12.0 ENVIRONMENTAL PROTECTION PROGRAM

FLINT has an Environmental Services group staffed by environmental professionals who are available to support key client and project requirements. Environmental Services practices, Safety Operating Procedures, and Standards are posted on ClearNet or available in print for team access and review as may be required.

Environmental Management is integral to the operations of FLINT where all employees must ensure that all activities are conducted in an environmentally safe and ethical manner. The Environmental Management program has been designed to address potential environmental impacts or releases before they happen at our worksites. FLINT Environmental Protection program includes (but not limited to) the following primary focus areas:

- Identification of (real or potential) environmental impacts which may arise from all work at FLINT (ex. chemical spills or waste disposal) and minimize potential environmental impacts through detailed project pre-planning.
- Development of supervisors, management and worker knowledge (and understanding) of applicable environmental laws, regulations, standards and guidelines enacted by regulatory authorities and associated industry standards (ex. best practices).
- Assess the environmental impacts associated with incidents and possible emergency situations through detailed root cause analysis and corrective action plans, with a goal to permanently eliminate the potential of environmental harm.
- Ensure resources are in place to establish and maintain operational processes, safe work practice – Codes, and procedures, which are measurable through compliance auditing/Inspection and can be managed (controlled) through corrective action plans

Legislation

Depending on the work activity and jurisdiction key environmental legislations (Acts, Regulations or Codes of Practice) may not apply. The following list of regulation encompasses emergency spill response reporting, transportation of dangerous goods environmental impact and reporting, and associated labour code regulations when workers are harmed through an environmental release. In most legislation across Canada the key definition of environment is inclusive of human beings and therefore releases of products (chemicals) that may not meet the threshold volumes for reporting will still require reporting to the local authority when there is the potential for adverse effect to the environment.

Definitions

Environment - “The component of the earth including:

- (i) air, land water,
- (ii) all layers of the atmosphere,
- (iii) all organic and inorganic living organisms,
- (iv) the interacting natural systems that include components referred to in clauses (i) and (ii)”.

Release – “Includes to spill, discharge, dispose of, spray, inject inoculate, abandon, deposit, leak, seep, pour, emit, empty, throw, dump place and exhaust”

Below is a list of Acts, Regulations or Codes directly controlling the handling of wastes and the reporting of releases to the environment. It is understood that the list below is not limited and there may be local or municipal legislation that may also apply:

- **Waste Management Act** – with regard to storage and disposal requirements.
- **Public Health and Public Lands Acts** – with regard to operating and maintaining a landfill and burning prohibitive wastes.
- **Clean Water and Clean Air Acts** – with regard to air and water emissions.
- **Occupational Health and Safety Acts** – with regard to Workplace Hazardous Materials Information System (WHMIS).
- **Spill Reporting Regulations** – require reporting of specific quantities of hazard classified chemical, hazardous wastes, or environmentally hazardous products.
- **Transportation of Dangerous Goods Act and Regulations**
- **Canadian Environmental Protection Act**
- **Canadian Fisheries and Ocean Act**
- **Provincial Environmental Protection and Enhancement Act**

12.1 RESPONSIBILITIES

Senior Management

- Establish environmental policy
- Maintain overall control of environmentally related issues, projects, improvement planning
- Ensure established environmental policies are administered and enforced in all areas of business.
- Support training and information awareness programs for all employees (inclusive off workers, contractors and visitors).

Business Unit Environmental, Health & Safety Department

- Establish procedures, practices, programs.
- Ensure that established environmental policies are administered in all areas of business.
- Support training and information awareness programs for all employees (inclusive off workers, contractors and visitors).
- Ensure that employees and subcontractors are aware of and effectively practice the policies and procedures set out in the Environmental Protection Plan.
- Participate in investigations where required or requested.
- Lead investigations into serious environmental incidents.
- Provide support to area managers, supervisors and employees
- Review Environmental Incident Investigation Reports to ensure accuracy, completeness and evaluate actions taken.
- Ensure government reports are completed within legislated time periods.
- Determine the need for environmental procedure and/or policy changes as a result of incidents.

Supervisor

- Ensure the safety of personnel, equipment and environmental impacts associated with work under their direction.
- Must participate in any Environmental Awareness training as defined by the customer, regulatory agency, or FLINT.
- Ensure that policies, procedures and work practices are applied to work conducted under their supervision.
- Ensure that reporting, investigation and follow-up are conducted in an effective manner for all incidents that occur under their work direction.

Employee

- Conduct their assigned duties in accordance with accepted and documented environmentally sound safe work practices, Codes or procedures.
- Ensure their individual awareness (training) of the requirements set out in the job specific emergency response

plan.

Subcontractors

- Ensure that all subcontract work is conducted in a manner that meets or exceeds the FLINT Environmental Policy and standards.
- Immediately report to site or project supervision any potential or actual environmental Impacts discovered at the worksite
- Ensure familiarization (and fully trained where applicable) with the current acceptable practice or procedure under which the work or project is being conducted.

12.2 SPILL/EMERGENCY RESPONSE

Spill response and emergency response planning shall be conducted on a site and spill specific basis.

Refer to Section 3 Emergency Preparedness – Sub Section 3.18 – Chemical/Product Release (Spill)

All spills must be handled under the follow sequence of steps:

Assess – Stop the Flow – Contain – Clean Up - Document

- Spill containment, absorbent socks, spill pads, clean-up equipment (suction pumps, hoes, vacuum trucks) manpower sources shall be assessed and established in place (where applicable – Ex. working near a water body / defined fishery) as a contingency plan at the risk planning stage.
- All spills are to be reported on a FLINT Incident Investigation Report, along with a Spill Report Addendum.

12.3 RECORD KEEPING AND DOCUMENTATION

Database entries and reports are managed through the appropriate tracking systems. Incident records are also held in files for archiving.

GENERAL WASTE

- General waste disposal records may be generated at the local point of generation (ex. FLINT facilities), and should be retained for a period of not less than 2 years (refer to the FLINT Records Retention Policy).

HAZARDOUS WASTE

- Hazardous waste generated at FLINT facilities and destined for disposal in an approved facility will require a Waste Profile (assessment or clearance) document, which determines the landfill acceptance of the material. The waste profile record shall be retained locally (at point of generation) and a copy may be held corporately for a minimum of 25 years after disposal.
- Hazardous Waste(s) disposed of in approved industrial or hazardous waste facilities (Ex. Class 1A or 1B licensed by the provincial regulatory authority) will have a waste disposal record and shall be retained locally (at point of generation) and a copy may be held corporately for a minimum of 25 years after disposal.
- Hazardous waste transported as a designated waste under TDG must follow all the regulatory requirements under the Act and Regulations. Manifests that document Consignor (generator), Carrier and Consignee (receiver) type, classification and volume of waste must be retained locally (at point of generation) and a copy may be held corporately for a minimum of 25 years after disposal.

RECYCLED WASTES

- Recycled wastes (Ex. used oil, wet or dry cell batteries, oil rags) may generate a recycle docket as a chain of custody confirmation that the material was collected, removed for processing and recycled as per regulation or recycle facility Approval to Operate (permit to conduct business in the specific jurisdiction). Recycle dockets shall be retained at point of generation for 5 years and a copy may be held corporately for a minimum of 5 years after disposal.

12.4 WASTE HANDLING AND DISPOSAL

- Waste will be handled and disposed of according to Regulations, Manufacturers Safety Data Sheets (SDS), and/or customer defined disposal requirements.
- Contract services may be utilized for licensed (re: approved) removal of specialized waste items such as waste oil, hydraulic fluid and antifreeze.

12.5 EMPLOYEE TRAINING

- Employees are advised of the FLINT Environmental Policy at the time of orientation. All employees will also participate in site specific Environmental Awareness programs. Workplace Hazardous Material Information System (WHMIS – 2015) Global Harmonization and Transportation of Dangerous Goods training is available for employees as required. All employees are advised of the location of applicable Safety Data Sheets (SDS) and are required to familiarize themselves with their contents.

12.6 WASTE MINIMIZATION

All FLINT facilities, projects and worksite will segregate hazardous, nonhazardous wastes (general garbage or recyclable) to ensure appropriate disposal (where applicable) and recycling into approved facilities (ex. used oil storage tank vs. landfilling).

Further, waste management at FLINT will focus on Reduce, Reuse, Recycle and Recover where possible before any final disposal into a landfill.

FLINT staff will conduct periodic waste management audits at applicable locations to assess opportunities and changes in process.

12.7 WASTE HANDLING AND DISPOSAL PROCESS

All employees and contractors employed by FLINT must accept responsibility for environmental protection. Waste generated by FLINT operations must be handled in a way that protects the environment and waste handling methods must be identified before a job begins. When waste is produced or handled on client sites, disposal must be coordinated with the owner or creator of the waste.

IMPORTANT: Regional areas operating under a jurisdictional licence to transport hazardous waste (Ex. TDG) must train all personnel and communicate to them the conditions of the licence.

Waste Handling Hazards

Workers shall;

- Wear appropriate PPE for the waste being handled (PPE may include: gloves for handling sharp objects, chemical gloves for any hazardous chemicals, Tyvek suits etc.).
ALWAYS PROTECT YOURSELF before handling any type of waste material.
- Review the appropriate SDS before handling waste products,
- Be trained and competent in FLINT safe work practices or procedures for regular waste removal activities or spill cleanup material disposal

The follow is a breakdown of waste specific handling requirements (additional information can be found in

FLINT safe work practices and/or procedures),

Used Lube Oil

Used lube oil must be contained to prevent spillage to ground and ground waters, or contamination with other products or chemicals. Containment must be clearly marked for contents, with appropriate WHMIS workplace labeling.

Disposal must be through an approved facility, or on location through on-site disposal/incineration (ex. building heat).

Documentation of the disposal company receiving the used oil, and the dates and volumes disposed of is required (waste manifest). Waste manifest records must be maintained on location for two years for material that is recycled or beneficially used, or 25 years for complete disposal (e.g., deep well disposal, Swan Hills Waste Treatment).

Glycols

Glycols must be contained to prevent spillage to ground and ground waters, or contamination with other products or chemicals. Containment must be clearly marked for contents, with appropriate WHMIS labeling.

Disposal must be through an approved reclaiming facility.

Oil Filters

Waste oil must be contained to prevent spillage to ground and ground waters. Containment must be clearly marked for contents with appropriate WHMIS workplace or manufacturers labeling (e.g., 205 L drum). The filter must be drained of oil (5% threshold to reduce the potential for spillage). Disposal must be through an approved facility.

Documentation of the disposal company receiving the oil filters, dates and amounts disposed of is required. Waste manifest records must be maintained on location for two years for material that is recycled or beneficially used, or 25 years for complete disposal (e.g., deep well disposal, Swan Hills Waste Treatment).

Oily Rags

Oily rags will be recycled through an approved recycling facility.

Used oily rags must be stored in approved steel containers that are marked appropriately and used for oily rag storage. Containers must be emptied routinely to prevent over-full situations.

Documentation of dates and amounts of recycled rags is required, through a Recycle Docket.

Batteries

Batteries must be must be stored to prevent the spillage of battery contents to ground and ground waters.

Wet cell batteries must be handled as hazardous waste when shipped (Class 8 substance) and 25 cores (Ex. car battery) or more than 500 kg must be shipped through an approved carrier (TDG regulated).

Dry cell batteries are recyclable and can only be shipped to a specific facility that will recover the material under approved regulatory processes. Storage areas must be clearly marked for contents with appropriate WHMIS labelling. Documentation of the disposal company receiving the batteries, dates and amounts disposed of is required. Waste manifest records must be maintained on location for two years for material that is recycled or beneficially used, or 25 years for complete disposal (e.g., deep well disposal, Swan Hills Waste Treatment).

Tires

Tires must be stored to prevent a hazard to workers or a work area. Disposal must be through an approved recycling facility. Documentation of the disposal company receiving the tires, dates and amounts disposed of is required.

Air Filters (Dry Only)

Air filters must not be contaminated with any hazardous or regulated materials and must be disposed of in a landfill approved to accept the waste.

Domestic Waste

Domestic waste must not be contaminated with any hazardous or regulated materials and must be disposed of in a landfill approved to accept the waste.

Sewage Disposal (Camps)

- Sewage disposal at camps must be collected by an approved (placarded) truck and the waste disposed of at an approved facility. Permits are required for direct disposal into a community sewage lagoon or approved disposal facility.
- Personnel handling sewage must be inoculated against hepatitis (Twinrex) to prevent infection.
- Waste manifest records must be completed and retained in accordance with local jurisdictional requirements.

Recyclables

Recyclables may include but not be limited to paper, printer toner / ink jet cartridges, aluminum, scrap metal, cardboard, glass, and plastics. Each facility is responsible for regularly collecting recyclables and taking them to approved recycling facilities.

12.8 WHMIS CONTROLLED PRODUCTS

- As per WHMIS – 2015 GHS all personnel at FLINT must have general WHMIS training/certification for veteran workers and prior to commencing work for new workers (refer to Section Training and Communication FLINT HSE Management System Manual).
- Additionally site specific worker education on the products used on site, (ex. chemical hazards & control, PPE, storage, SDS details, emergency procedures and handling criteria) must also be provided by FLINT management/supervision.
- Each product utilized in the workplace must have a detailed 16 Section Safety Data Sheet printed and readily available in key location at the worksite (as per WHMIS 2015 – GHS standard).
- Due to recent changes with WHMIS 2015 improvements to the Supplier Labels have been implemented, if the product is missing a supplier (manufacturer) Workplace Labels have been enhanced now requiring the statement “Safe Handling Precaution. Place a Workplace Label on a new empty container prior to decanting a larger volume into a smaller usable container (ex. Supplier 205 litre drum decanting into a 1 litre spray bottle).
- Hazard Pictograms have change from round symbols to red squares on a point and there are ten pictograms as follows:
 - Gas Cylinder
 - Exploding Bomb
 - Health Hazard
 - Flame over Circle
 - Skull and Crossbones
 - Environment
 - Flame
 - Corrosion
 - Exclamation Mark
 - Biohazard
- The Environment hazard pictogram has not been integrated into WHMIS, however where applicable it illustrates and Environmental Hazard (refer to Element 17 Industrial Health for further information)
- Refer to the WHMIS 2015 GHS requirements under standard employee training handbook (WHMIS 2015) or further details internet based.

Chemical Management Procedure – New Product Introduction to Worksite

All products on site must have a detailed

This procedure is for all FLINT locations that wish to purchase any new WHMIS controlled products not previously approved for use at FLINT facilities.

1. **NOTIFY** - Locations wishing to purchase a new controlled product must notify the HSE manager for the division accordingly.
2. **ASSESS** (with an HSE representative), new product SDS must be forwarded to the HSE manager(s) for review and approval. The location must all request that the supplier forward the SDS of the new product to the FLINT site HSE representative
3. **REVIEW AND APPROVAL** - After review of SDS and approval granted by HSE, the location may purchase the product.
4. **SAFETY DATA SHEET REVIEW** - All location employees must review and understand the SDS for the new product (ex. review at a safety meeting) before the product is introduced into the workplace.
5. **PRODUCT CHECK** - A check shall be done (when the product arrives on site) to ensure that the correct hazard (WHMIS) supplier labels are in place on the container(s). If the supplier label is missing refuse the shipment of product and get the supplier to provide a properly labeled container.
6. **CONTRACTOR NOTIFICATION** - Operating personnel from the facility are to notify any long-term contractors working at the location of the new product being introduced at the workplace.

12.9 PROJECT ENVIRONMENTAL CHECKLIST

FLINT has a Project/Facility Environmental Checklist which needs to be completed prior the initiation of the work to ensure key environmental protection measures are in place to compliance to FLINT Environmental policy and the overall protection of the environment.

Form 12B: Environmental Project Checklist must be completed and attached to the Project/Facility Specific Safety Plan.

12.10 HAZARDOUS MATERIAL STORAGE

Hazardous Material must be stored in safe proper containment i.e. flammable, bulk fuel etc. Refer to the appropriate SDS for storage criteria.

- Flammable or combustible materials should be storage in metal, fire / explosion cabinets with the contents clearly marked on the outside of the cabinet door (workplace WHMIS label).
- Compressed gas storage should be in a secure area of the worksite, on metal shelving or cabinets away from ignition sources (minimum of 7 meters). All compressed gas cylinders should be stored upright and chained into place to prevent the cylinders from tipping over. Cylinders not in use must have their appropriate valve cap screwed securely into place.
- All flammable, combustible or compressed gas storage areas should be protected from collision with equipment and vehicles and placed behind protective steel barricades, walls or inside secure rooms where possible.
- To protect the environment from potential container leaks regular inspection of containers, chemical storage cabinets and areas should be completed on a regular basis (daily) to help prevent releases to the environment.

Always ensure chemical storage areas are away from floor drains, water bodies, creeks or drainage areas where feasible. Alternatively the above areas will have to be protected with spill socks or solid barriers which would stop the flow of material into environmentally sensitive zones (Ex. sanitary or storm sewers that discharge into municipal waste water treatment facilities).

ATTACHMENTS:

Form 12A - Environmental Spill Report

Form 12B - Environmental Project Checklist

13.0 COMPANY VEHICLE USE

FLINT has an established Vehicle Use and Safety Policy set corporately for all FLINT personnel for “the safe, compliant and accountable operation of FLINT owned, leased, and rented vehicles and equipment while used for business or authorized personal use”.

The Supply Chain Management (SCM) Fleet Vehicle Use and Safety Policy details key elements of safe vehicle and equipment operation under the following:

Assignment of Company Vehicles

- Commercial Vehicles
- Driver Qualifications
- Driver Rules and Responsibilities
- Vehicle Equipment/Idling
- Vehicle Management/Administration
- Vehicle Documentation/Inspection and Care
- Driver Evaluation
- Defensive Driving
- Vehicle Allowance Policy
- Fleet Fuel – Maintenance Credit Card
- Distracted Driving Policy
- Incident Reporting
- Working Alone
- Driver Safe Practices
- New Driver Training

GPS USE AND SPEED ENFORCEMENT POLICY

The purpose of the GPS (Global Positioning System) Use and Speed Enforcement Policy is to ensure that all FLINT personnel have a clear understanding of company expectations regarding the performance of personnel while driving company vehicles (Refer to SCM – Fleet GPS Use and Speed Enforcement Policy).

Operating a company or contractor vehicle in an unsafe manner and causing damage to company reputation will result in progressive discipline up to including termination.

The GPS is a performance management aid within the fleet which contains company mandated parameters and speed limits for all provincial roads and highways. FLINT GPS equipment installed in company vehicles, and applicable contractor vehicles, monitors the following key vehicle operational parameters:

- Seatbelt Usage use is monitored
- Speeding – never exceed the posted speed limit.
- Harsh Cornering, Accelerating, Braking – Based on G-Force.
- Engine light on.
- Fuel levels below 10%.
- Low battery alerts.
- Unauthorized GPS device removal.

Obey all posted speed signs and FLINT speed policies for all road types and surfaces. In cab notifications are set at 10 km/hr. above the Provincial regulatory speed limits and any other locations we may be required to perform work.

The information contained in this document is intended for general use only. Personnel using this document are responsible for ensuring that the applicable legislation and customer-specific practices, procedures and standards are complied with. If assistance is required, please contact an HSE representative.

13.1 DISTRACTED DRIVING POLICY

The purpose of this policy is to recognize that an employee's primary responsibility while driving is to focus all of their attention on the safe operation of their vehicle. There are many inherent safety concerns associated with driving and employees must avoid and reduce wherever possible, activities or distractions that takes their focus away from driving. Each employee is responsible for his or her safety and under no circumstances should employees place themselves or others at risk by any type of interaction on a communication device that would distract them from focusing their full attention while driving to fulfill business needs, (Refer to FLINT Vehicle and Use Safety Policy – SCM Fleet).

- of a personal or company owned handheld communication device for receiving or making phone calls, reading and sending text/email messages or any other use is strictly prohibited at all times when operating a company owned, leased or personal vehicle for business.
- Additionally, such use of a company owned handheld communication device is prohibited at all times while operating any vehicle on personal time. Drivers shall only answer or make calls, read or send text messages and email, or otherwise utilize the functionality of a communication device when the vehicle is legally parked in a safe location out of traffic.
- Drivers are permitted to use a cell phone to make or receive calls in hands free mode – this means the device is not in the drivers hand and is activated by voice or single touch to the device.
- CLIENT CELL PHONE USE POLICY – If client requirements prohibit any use of a cell phone while driving you must always follow the client expectations.

13.2 JOURNEY MANAGEMENT

FLINT has a detailed journey management procedure which outlines the process (procedure) that ensures that all workers are: “adequately protected from potential injury or harm while working alone and on work related travel,”

Supervisors are responsible for individuals driving on company business are accountable for ensuring a Journey Management Plan is prepared when required.

Anyone driving a company vehicle or driving on company business is responsible for meeting the requirements of a Journey Management Plan when needed. Journey Management Planning applies to all FLINT worksites and to all FLINT employees and contractor personnel.

FLINT's Journey Management Procedures covers the following key elements:

- Purpose
- Roles and Responsibilities
- Definitions
- Hazards
- Journey Management
- Journey Management Plan

13.3 DEFENSIVE DRIVING

All FLINT employees operating company trucks and equipment must demonstrate solid defensive driving skills and adjust their specific driving habits to the weather/road conditions, driving near other road users and drive to avoid collisions with wildlife and other hazards on the road or route. It is FLINT policy to require all employees “whether new or existing drivers to take defensive driver training”, (refer to Vehicle Use and Safety Policy).

13.4 GENERAL VEHICLE USE AND DRIVING REQUIREMENTS

1. A vehicle used to transport equipment or materials shall have an adequate bulkhead installed and loads shall be restrained to prevent movement during any shipping condition.
2. Every company vehicle shall have a designated person who is responsible for its inspection, maintenance and safe operation.
3. All employees driving company owned, rented or leased vehicles shall:
 - Possess a valid driver’s license for the class and size of vehicle used.
 - All personnel assigned to company owned, leased or rented vehicles shall produce a driver’s abstract and current copy of driver’s license annually as per insurance requirements.
 - Abstracts are to be reviewed by management, signed and filed as a driver record.

13.5 ACCIDENT REPORTING AND INVESTIGATION

Accidents by any employee traveling on company business whether in a company owned, leased or rented vehicle, or a personal vehicle being utilized for company business, must be reported immediately. Vehicle incidents must be reported, investigated, documented and followed up by the person in control of the vehicle at the time of the incident and supervisor (refer to Section 15 Incident Investigation and Injury Claims Management).

ATTACHMENTS:

Vehicle Use, Safety and Maintenance Policy
Driver Questionnaire and Vehicle Use Agreement
Journey Management

14.0 SAFETY INSPECTIONS

14.0.1 Policy

It is FLINT policy to for all levels of management, supervision, and workers to actively participate and conduct safety inspections at all our facilities and worksites in an effort to control and eliminate hazards.

Inspections shall be documented corrective action plan developed, issues assessed and resources allocated to address the prioritized items, through a stated designate, completion of action with a targeted time line. Inspections are intended to minimize injuries and property damage incidents at our work locations.

Senior management is responsible for the overall operation of the safety inspection program, whereas line management is responsible for directing formal inspections in their areas and involves workers in the inspections. All formal inspections shall be documented, and the report retained for 1 year.

Additionally line management is responsible for conducting ongoing informal inspections of areas where their crews are working. Workers are responsible for participating in and contributing to the inspection program, and assisting in the final formal or informal audit documentation and reporting.

Regular inspections of land, buildings, equipment and worksite activity are beneficial for anticipating, recognizing, evaluating, controlling and eliminating substandard act, conditions or hazards. Health and safety concerns for all workers in identified key areas will be given priority, with a focus towards preventing injury incidents.

14.0.2 Definitions

Informal (Ongoing) Inspection

- Informal inspections include a daily, visual inspection of workplace conditions. These inspections are conducted by all employees as a part of their regular work tasks and may be documented on BBO cards, FLHA, or JHA's.

Formal Inspection

- Formal inspections are documented visual inspections of the work place. Formal records are kept, action assigned and follow-up inspections planned. Formal inspections are completed at a minimum of monthly.

14.0.3 Safety Inspections

Managers and supervisors are encouraged to involve workers in the inspection process as this provides a learning opportunity for everyone. Inspections are to be documented on Form 14A: Safety Inspection Report. Utilize previous inspection reports as a point of reference for the new inspection report.

14.0.4 Safety Inspection Procedure

1. Obtain and review previous inspection reports.
2. Obtain an Inspection Report Form.
3. Commence an inspection tour.
 - Throughout the inspection tour, key into lesser utilized area, closed rooms and storage.
 - Look over, under, around, beside, inside etc.
 - Take time to carefully observe the activities of all personnel onsite who are under FLINT control.
 - Document all unsafe acts and conditions identified.

4. Upon completion of the inspection tour, rank the unsafe acts/conditions identified on a worse- case basis.
5. Identify corrective action required for items noted.
6. Ensure a person is assigned to be responsible for correcting the items noted and establish a date for completion. Ensure corrective action plans use the S.M.A.R.T.E.R (Specific – Measurable – Accountable – Reasonable – Timely – Effective – Reviewed).
7. Review contents of the inspection report with all personnel at the next safety meeting (or immediately depending safety issue discovery, severity, and consequences).
8. Follow up to ensure all corrective action has been completed.

14.0.5 Leadership On Site Review

Senior leaders, district managers, and project managers are required to perform periodic field level assessments of the effectiveness of the Safety Management System. Specific frequencies are identified within Element Two Roles and Responsibilities. Assessments are to be discussed with site leaders and documented on Form 14B: Leadership Site Safety Review.

14.1 SAFETY AUDITS

Each of the FLINT areas will be audited annually. Audits measure the effectiveness and degree of implementation of FLINT HSE program. Refer to Element 20 SMS Audits for specific details.

14.2 OHS INSPECTIONS

Government Inspections may be done on a drop in basis or scheduled based on identified concerns, regulatory compliance initiatives. Government Inspectors will be allowed access to any construction site or facility providing they have received appropriate clearance and identification, and formal worksite orientation prior to commencing the inspection. Government inspectors will be advised of the personal protective equipment requirements and will be accompanied on their inspections by Project Supervision or designate.

Any directives or written orders received from government inspectors must be discussed with Supervision before the inspector leaves and before receipt of a written order. All Corrective measures will be directed by Supervision within the time frames allocated on the government order(s). Government orders will be posted on bulletin boards

14.3 BEHAVIOUR OBSERVATIONS

The FLINT Behaviour Observation program has been detailed under Section 4 – Hazard Assessment, Control and Communication, refer to Section 4 for specific information on completing and reporting daily Behaviour Observations.

14.3.1 Tracking & Trending

- All observations will be entered into the corporate tracking system where observations are trended for communication back to the frontline supervisors and workers.

14.3.2 Behaviour Observation Training

- Initial training in observation techniques is managed through the orientation to sites and is required for all observers. Initial training includes basic understanding of behaviour reinforcement concepts.

Supervisors must complete additional training. This training will include how to:

- Identify the relationship between behaviour s and incidents.
- Define and recognize Behaviour s and Consequences.
- Understand Consequence classification and its application.
- Implement and monitor the components of Behaviour Based Safety Practices.

- Use positive feedback to reinforce safe behaviour and coach and correct unsafe behaviour .
- Recognize trends from Behaviour Observation data.
- Identify problems and assign appropriate solutions.
- Train others in Behaviour Based Safety concepts.
- Document all training and update the training database.

14.3.3 Documentation Summary

File these records in the corporate tracking system found on the ClearNet Safety Page.

14.4 PERMANENT FACILITIES

All permanent facilities, (including maintenance operations), must be inspected on a monthly basis and inspection should include representatives from the operation centre management and employees in that workplace.

14.5 PROJECTS

The Project Superintendent (or equivalent) will ensure that a formal worksite inspection is completed weekly (monthly as a minimum). Completed Worksite Inspections will be reviewed with the site supervisor and employees. Corrective actions will be identified and target dates set for each item on the inspection. These items will be corrected as specified. Copies of the report must be made readily available to all employees at the work site.

14.6 EQUIPMENT INSPECTION

All equipment (pickups, tank truck, loaders, skid steers, front end loaders, light plants, mobile trailers etc.), utilized at FLINT must have an inspection prior to use (refer to Safe Work Practice – Equipment Inspection Guide). Documentation generated from each equipment inspection must be retained and filed for a period of 1 year (refer to FLINT Records Retention Policy).

14.7 SAFETY EQUIPMENT INSPECTION

All safety equipment and standard/specific PPE must be inspected prior to use inclusive of hard hat, safety eye wear, safety (toed) boots.

Job specific safety equipment must also be inspected prior to use including (but not limited to):

- Personal (4 head – CO/H2S/LEL/O2 ... gas detection) Monitors
- Fire proximity suits,
- Supplied air back – packs (SCBA)
- Supplied air systems - (SABA),
- Fall protection harness, lanyards, connects, restraints
- (Safety and supplies equipment) lifting ropes

Refer to Element 7 Personal Protective Equipment for further details on requirements and associated documentation.

ATTACHMENTS:

Form 14A - Safety Inspection Checklist
Form 14B - Leadership Site Safety Review
Form 14C - Vehicle Inspection Form
Form 14D - Equipment Inspection Form
Form 14E - Security Checklist

15.0 INCIDENT INVESTIGATION AND REPORTING

Incident investigations are a methodical examination of the facts of an incident, (to understand What, When, Where How and Why), that resulted, or could have resulted in injury, illness or loss. The FLINT incident investigation and reporting process outlined below describes how to analyze and investigate incidents to determine direct, indirect, and root causes. All incident investigations are conducted not to find blame, but rather through the analysis of the facts supervision, management and employees can determine corrective actions or controls designed to prevent a recurrence of similar incidents in the future and to share learning's from the investigation.

An incident investigation is comprised of three parts:

1. **Description of the Incident** (What, When, Where, How did the incident happened?)

The description identifies in detail what, when, where, and how the incident occurred including all related factors.

2. **Cause of an Incident** (Why did the incident occur?)

What behaviours, actions of personnel, system/process failures or worksite conditions contributed to the incident, inclusive of direct, indirect causes and ultimately the root cause(s). Causal analysis is not conducted to blame, but rather it is completed to determine the root cause(s) of an incident based on facts.

3. **Corrective Action** (Prevent Incident Re-occurrence)

Corrective actions or controls designed to prevent a recurrence of a similar incident in the future must be implemented.

Definitions

Incident

An incident is an unplanned, unwanted event that results in personal harm, property damage or loss

Near Miss

A Near Miss is an unplanned, unwanted event that under slightly different circumstances could have resulted in personal harm, property damage or loss.

Serious Incident (refer to Risk Matrix)

- **People:** Any serious injury (Ex. Restricted Work, Medical Aid, Lost Time)
- **Property Damage (Loss):** Any property damage or loss over \$5,000.00
- **Environmental Impact:** reportable occurrence
- **Public Image & Perception:** government intervention
- **Any "Near Miss" that fits the "Serious Incident" criteria.**

Lessons Learned

A communication tool intended to provide timely, reliable, and accurate notification of events. The primary purpose is to effectively communicate information regarding the event with the intent of preventing similar future occurrences. The expected timeline for a lessons learned to be completed is 24-48 hours post investigation completion.

15.1 INCIDENT RESPONSIBILITIES

All Employees

- Report all incidents immediately when it happens to their supervisor.
- Actively participate in all aspects of the incident investigation process as required.
- Provide honest statements of known facts to investigators when requested.

Supervisors

- Report all incidents according to FLINT Health and Safety Policy.
- Report all incidents to the appropriate customer representative in a timely manner.
- Conduct prompt investigations with the support of area HSE resources.
- Determine immediate and root causes and corrective action.
- Implement corrective actions identified as a result of written incident investigation.

Line Managers

- Ensure that the FLINT incident investigation process is followed.
- Report incidents to the appropriate customer representative.
- Coordinate Post-Incident Alcohol and Drug testing as required.
- Ensure that corrective actions identified in investigations are implemented and are effective.

Senior Management

- Support the incident investigation and reporting process.
- Allocate adequate resources for the investigation and approved corrective actions
- Review incident investigation reports; ensure that the FLINT incident investigation process is followed.
- Support corrective actions identified in Incident Investigations.

Area HSE Department

- Participate in and coordinate incident investigations.
- Train supervisors in incident investigations techniques
- Support and mentor line managers and supervisors in the development of their investigation skills.
- Lead investigations into serious incidents.
- Review all Incident Investigation Reports to ensure accuracy, completeness and evaluate actions taken.
- Ensure government reports are completed within legislated time periods.
- Document all investigations and corrective actions within the Corporate Incident Tracking system

15.2 INCIDENT RESPONSE PROCEDURE

1. Care for the ill or injured.
2. Ensure appropriate treatment is provided to the injured. A Manager, Supervisor, or Safety Personnel will accompany any injured worker who is transported from the work site to medical attention.
3. Follow the Emergency Response Plan for that work site (where applicable).
4. Notify the appropriate level of FLINT supervision/management, and regulatory authority (where applicable).
5. Ensure that Critical Incident Stress Debriefing is available, as required.
6. Initiate incident investigation and preliminary reporting procedure.

15.3 INCIDENT REPORTING – INTERNAL AND EXTERNAL**Internal Notification**

All incidents, no matter how minor must be reported to the site supervisor immediately.

- One-level-up Leadership reporting process (see diagram below), must be initiated via text or phone call.
- All incidents requiring medical attention, or that have the potential for medical attention require the immediate notification of the Health, Safety & Environment (HSE) Department.
- All Serious Incidents must be reported to the HSE Department immediately.

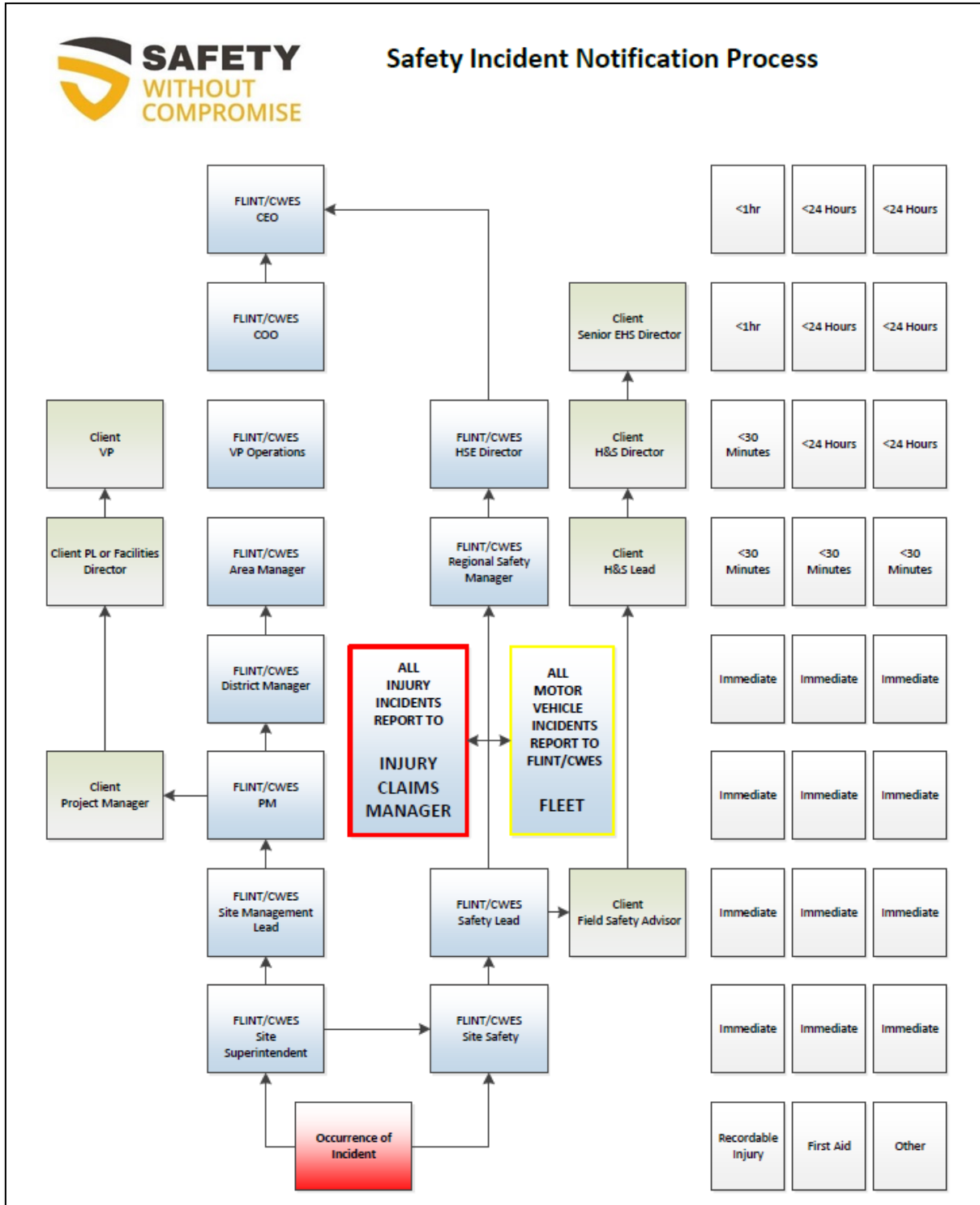
Internal Reporting – Incident Investigation

- All incidents must be reported to one level up immediately via text or phone call upon discovery or reporting by the worker(s) involved.
- All incidents are required to be entered into the incident tracker as soon as possible, no longer than 24 hours post after the incident is reported.
- All Incidents require a Flash Report. For low severity incidents the flash report will be sent out as part of the daily report the following morning. For high severity incidents the flash will be sent out as soon as possible, no longer than 24hr post incident.
- Supervisor is responsible to provide daily, documented progress reports on any injury or serious incidents to the Health, Safety & Environment Department until the final Incident Report is complete.
- All incident investigation reports shall be completed in 72 hours (or sooner based on client requirements). This includes the DNV SCAT analysis and wording incorporated into the report. A descriptive explanation for the findings identified as immediate and root causes with corrective actions identified. All corrective actions must be added to the Corrective Action Tracker and managed to closure. Responsible supervisors and timelines should be established for all corrective actions and both worker and supervision will have signed off.
- Lessons Learned shall be completed within 24-48 hours post investigation completion for most applicable incidents. Applicable incidents will be based on severity, potential for harm to people, property, or the environment. Completed lessons learned will include the DNV SCAT analysis, root cause and corrective actions established as well as incident photos. Lessons Learned will be reviewed with all affected employees in a Shift Start or Safety Meeting and documented. All completed lessons learned will be uploaded into the Lessons Learned folder on ClearNet.
- Incident Tracker (located on ClearNet HSE Team Site) must be updated as the investigation progresses. Details including witness statements, flash reports, investigation reports, injury reports, modified work agreements, pictures, technical details, and applicable email communications must be uploaded. Do not upload WCB related information, this information and documents should be sent directly to Corporate WCB Claims Manager.
- In the event that the client uses an incident classification schedule that conflicts with the Flint Injury and Illness Classification Guideline, the client incident type must be noted in the Incident Tracker to allow accurate tracking of incident data.
- The HSE Department will manage, control and archive all incident reports as per the Records Retention Policy.

External Notification

- **Regulatory Authority** - All notification of Regulatory Authorities will be coordinated by the Health, Safety & Environment (HSE) Department.

INTERNAL INCIDENT REPORTING AND TIMELINE PROCESS FLOWCHART



NOTE: Other = (includes but not limited to vehicle incident (collision)/3rd party collision release of chemicals, loss of material/equipment, TDG event, regulatory release report (ex. Alberta Environment), public complaint (ex. noise, odor, perceived harm), wildlife strike.

REGULATORY REPORT - ALL INCIDENT TYPES

TYPE OF INCIDENT		BRITISH COLUMBIA	SASKATCHEWAN
Workplace Injury	Workers' Compensation Board (WCB)	WorkSafe BC	WCB Saskatchewan
Serious Workplace Injury or Near Miss with Serious Workplace Injury Potential	OH&S (hazardous occurrence report) WCB	OH&S (hazardous occurrence report) WorkSafe BC	OH&S (hazardous occurrence report) WCB
Vehicle Collision	RCMP – Injury Immediately RCMP >\$2,000 immediately Fish and Wildlife (animal) Insurance Coordinator	RCMP Fish and Wildlife (animal) Insurance Coordinator	RCMP Forest Service Insurance Coordinator
Transportation of Dangerous Goods (TDG) Occurrence	RCMP (Any amount lost on placarded load, anywhere in Canada TDG (occurrence report)	RCMP (Any amount lost on placarded load, anywhere in Canada TDG (occurrence report)	RCMP (Any amount lost on placarded load, anywhere in Canada TDG (occurrence report)
Spill – Reportable	RCMP (local authority) Environment Regulatory Body Area Spill COOP	RCMP Provincial Emergency Program Ministry of Environment	RCMP Spill Control Centre
Fire	RCMP Fire Commissioner Forestry PTMAA (tank farm)	RCMP Fire Commissioner	RCMP Fire Commissioner
Fatality	RCMP (motor vehicle) – Immediately WH&S (workplace) – Immediately Physician (occupational disease) WCB (All fatalities)	RCMP - Immediately WH&S (workplace) – Immediately	RCMP Immediately WH&S (workplace) – Immediately
Serious Workplace Injury (FEDERAL)	Federally Operated Status (Ex. National Safety Code - NSC) Hazardous Occurrence Investigation Report – Explosion/Loss of Consciousness/Disabling Injury/Emergency Procedure/Other Notify authority within 24 hours – Labour Reference – Canada Labor Code/Canadian Occupational Health and Safety (COHS) Regulations Section 15.8		

15.5 IMMINENT DANGER INVESTIGATIONS

All employees of FLINT have an obligation to refuse unsafe work that they consider constitutes to be imminent danger. When an employee notifies their immediate supervisor that they are refusing unsafe work that they consider imminent danger, work will be stopped, and the employee and supervisor must discuss the refusal, conduct a hazard assessment and determine the nature of the refusal.

- If the refusal of unsafe work is the result of a lack of skills, training or a personal reason, and another employee can safely complete the work, the incident must be documented on the refusal of unsafe work report, reported, and investigated before work can continue.
- If the work cannot be safely completed, and an employee continues to refuse unsafe work due to imminent danger, the HSE Manager must be notified to lead an investigation into the refusal of unsafe work.
- Under no circumstances will there be any disciplinary action be taken against any employee who refuses to perform unsafe work, or a task that he feels will put themselves or others at risk.

15.6 VEHICLE INCIDENT INVESTIGATIONS

In addition to the incident responsibilities, reporting and investigation requirements for all incidents (outlined previously in this document), specific responsibilities are in place for vehicle and equipment damage incidents.

RESPONSIBILITIES – VEHICLE INCIDENT INVESTIGATION(S)

Management

Complete a background check of the driver involved in any vehicle collision, including:

- Current driver record and abstract
- Drivers work record
- Hours of service review
- Work schedule
- Driver's activities for the previous 72 hours

This information is to be documented and submitted along with the incident investigation report.

Supervisors

Participate in the safe recovery of vehicles/equipment and that additional equipment damage is not incurred during the recovery process. Ensure that a complete and thorough investigation has been performed

Drivers

- Notify the local Police immediately if a vehicle collision results in damage to private property, serious injury, death, or results in vehicle damage that exceeds \$2,000.00.
- Collect information regarding third parties and witnesses including:
 - Insurance Information
 - Witness contact Information
 - Vehicle Photos
 - License Photo

15.7 VEHICLE INCIDENT INVESTIGATIONS

FLINT has a dedicated Fleet Team that is responsible for the overall vehicle use and maintenance, inclusive of rental units as captured under a separate company policy call the Vehicle Use and Maintenance Policy (refer to ClearNet SCM for the full policy)

All motor vehicle incidents (MVI's) that happen in FLINT will be fully investigated by the HSE Team in the specific area in conjunctions with the Fleet Team.

The following process outlines the requirements for motor vehicle incident where a) no other vehicles, property, or people are involved or b) the incident involved other vehicles, property damage, or people.

A. No other vehicles, property or people are involved

- Call you Supervisor and or Area Manager as soon as it is safe to do so.
- The Supervisor and or Area Manager will inform the relevant member of the HSE team.
- The relevant member of the HSE team will initiate the accident investigation.
- Operations should then coordinate to have the vehicle taken to an authorized repair shop for a mechanic assessment and repair cost evaluation.
 - Operations should notify the NSC coordinator via email with the accident investigation report so they can begin the insurance claim. If there are unknown costs at the time of submission it should be communicated to the insurance

B. Other vehicles, property or people are involved

- Call you Supervisor and or Area Manager as soon as it is safe to do so.
- The Supervisor and or Area Manager will inform the relevant member of the HSE team.
- If the incident involved other vehicles, property, or people the Asset and Equipment team must be notified immediately to ensure the claim is started promptly and that the relevant parties are included in proceedings.
- The relevant member of the HSE team will initiate the accident investigation.
- Operations should then coordinate to have the vehicle taken to an authorized repair shop for a mechanic assessment and repair cost evaluation.
- Operations should provide the NSC coordinator (via) email with the accident investigation report as soon as possible, so the insurance claim is kept up to date. If there are unknown costs at the time of submission it should be communicated to the insurance company know not to sign off on the claim immediately.
- No repairs are to be approved or carried out until the insurance company provide direction.
- Once the insurance company approve the repairs the NSC coordinator will notify operations
- Operations will coordinate with the repair facility and keep the NSC coordinator informed as the repairs proceed.

15.8 RISK MATRIX

Potential Consequences (For any incident or potential incident check all effects)				
	People	Property Damage (Loss)	Environmental Impact	Public Image & Reputation
Catastrophic	Fatality	>\$10,000 Impact	Reportable occurrence	Government intervention
Critical	Permanent impairment and/or long term injury or illness	<\$10,000 to >\$5,000	Owner standard not met	Owner intervention & local media intervention
Moderate	Serious injury (Restricted work, Medical Aid)	<\$5,000 to >\$1,000	Housekeeping not to standard	Community or local altercation
Minor	First Aid	<\$1,000	No impact	Individual or none

Risk Assessment Matrix					
	Frequent	Probable	Occasional	Remote	Improbable
High Risk	Unacceptable, Must reduce risk, Action required				
Medium Risk	Undesirable, Take risk reduction measures, Action required				
Low Risk	Acceptable, Reduce as practical, No further action required				
Catastrophic	H	H	H	M	M
Critical	H	H	M	M	L
Moderate	M	M	M	L	L
Minor	M	L	L	L	L

Probability	
Frequent	Likely to occur repeatedly in three years
Probable	Likely to occur several times in three years
Occasional	Likely to occur sometime in three years
Remote	Not likely to occur in three years but possible
Improbable	Probability of occurrence cannot be distinguished from zero

Decision Marking Flow Chart	
Where the final risk falls in one of these categories, this decision making flow chart MUST be met prior to work starting.	
■	Risk approved by, General Manager & HSE Manager
■	Risk approved by Area/ District/ Project Manager & HSE Designate
■	Risk approved by Manager at field level

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15.9 INCIDENT RESPONSIBILITY AND INVESTIGATION MATRIX

Incident Responsibility & Investigation Sign Off Matrix												
Incident Classification	Incident Severity	CEO	COO	Vice President Operations	HSE Director	Area/General Manager	Area HSE Manager	District/Operations Manager	Operations/Project Managers	HSE/HR Advisor or Lead	Site Level Leadership	
		Fatality/Lost Time Incident	Red	X	X	X	X	X	X	X	X	X
Medical Treatment	Yellow			X	X	X	X	X	X	X	X	
Restricted Work	Yellow			X	X	X	X	X	X	X	X	
First Aid	Green					X	X	X	X	X	X	
First Aid No Treatment	Green							X	X	X	X	
*Potential Serious Incident or Near Loss (PSI)	Yellow					X	X	X	X	X	X	
Damage > \$5000 (FLINT/CWES Property/Equipment)	Yellow					X	X	X	X	X	X	
Damage < \$5000 (FLINT/CWES Property/Equipment)	Green							X	X	X	X	
**Reportable Regulatory Event	Red	X	X	X	X	X	X	X	X	X	X	
Loss of Containment	Green							X	X	X	X	
Stop Work Order	Red	X	X	X	X	X	X	X	X	X	X	
Reasonable Cause	Green							X	X	X	X	
Non Compliance/Performance	Green							X	X	X	X	
Hazard ID/Near Loss	Green										X	

*Including Life Saving Rule Violations (LSR)
 **Any event that requires reporting to an external agency or regulatory body (OHS, NSC, TDG ect.)
 NOTE: To determine severity rating/weight, refer to the severity rating guide

15.10 RISK MATRIX/RISK SEVERITY LEVEL INVESTIGATION RESPONSIBILITY

Incident Risk Matrix Classification	Incident Severity	On-Site Support Required	Evaluation required	Results of cause determination	Method of Cause Determination	Interim Corrective Action	Actions	Oversight (Owner) Sign Off
Fatality – Work Related	Red	VP & HSE Director within 24hrs	RCA Team	Immediate and underlying causes (root)	Structured process (SCAT, Taproot)	Need determined by VP, Director	Preventive	COO/CEO, VP, HSE Director OH&S
Fatality – Non-Work Related	Red	VP & HSE Director within 24hrs	RCA Team	Immediate and underlying causes (root)	Structured process (SCAT, Taproot)/OH&S, limited information	Need determined by VP, Director	Preventive	COO/CEO, VP, HSE Director OH&S
Lost Time injury	Red	Area/District Manager & HSE Lead within 24hrs	RCA Team	Immediate and underlying causes (root)	Structured process (SCAT, Taproot)	Need determined by VP, Director	Preventive	COO/CEO, VP, HSE Director
Regulatory Reportable Environmental	Red	Area/District Manager & HSE Lead within 24hrs	SCAT as a minimum, but RCA may be Required.	Immediate and underlying causes (root) as directed by VP or HSE Director	Structured process (SCAT, Taproot)	Need determined by District Manager, HSE Lead	Robust corrective actions	VP, HSE Director, Area Manager
Owner/Client Reportable Environmental	Yellow	District/Project Manager & HSE Lead within 24hrs	SCAT as a minimum, but RCA may be Required.	Immediate and underlying causes (root) as directed by VP or HSE Director	Structured process (SCAT, Taproot)	Need determined by District Manager, HSE Lead	Robust corrective actions	VP, HSE Director, Area Manager
Restricted Work Injury	Yellow	District/Project Manager & HSE Lead within 24hrs	ACA as a minimum, but RCA may be Required.	Immediate and underlying causes (root) as directed by VP or HSE Director	Structured process (SCAT, Taproot)	Need determined by District Manager, HSE Lead	Robust corrective actions	VP, HSE Director, Area Manager, District Manager
Medical Treatment	Yellow	District/Project Manager & HSE Lead within 24hrs	ACA as a minimum, but RCA may be Required.	Immediate and underlying causes (root) as directed by VP or HSE Director	Structured process (SCAT, Taproot)	Need determined by District Manager, HSE Lead	Robust corrective actions	VP, HSE Director, Area Manager, District Manager
Damage >\$5000.00	Yellow	District/Project Manager & HSE Lead within 24hrs	ACA as a minimum, but RCA may be Required.	Immediate and underlying causes (root) as directed by VP or HSE Director	Structured process (SCAT, Taproot)	Need determined by District Manager, HSE Lead	Robust corrective actions	VP, HSE Director, Area Manager, District Manager
Damage <\$5000.00	Yellow	Site Management & Site HSE (Additional support if required)	ACA as a minimum, but RCA may be Required.	Immediate and underlying causes (root) as directed by VP or HSE Director	Structured process (SCAT, Taproot)	Need determined by District Manager, HSE Lead	Robust corrective actions	Area Manager, District Manager, HSE Manager
First Aid	Green	Site Management & Site HSE (Additional support if required)	ACA as a minimum, but RCA may be Required.	Immediate and underlying causes (root) as directed by VP or HSE Director	Structured process (SCAT, Taproot)	Need determined by District Manager, HSE Lead	Robust corrective actions	Area Manager, District Manager, HSE Manager
Hazard ID	Green	Site Management & Site HSE (Additional support if required)	No investigation required, used for trending.	Adequate detail to understand cause.	Interviews, observations, individual knowledge	None required	Closed based on actions taken	Lowest level of Supervision available as a minimum.

*RCA – Root Cause Analysis
 **ACA – Apparent Cause Analysis

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15.11 SEVERITY WEIGHTED INCIDENT SYSTEM

The severity weighted system focuses on a measurable reduction of injury severity. Lower severity equates to less interaction, and less exposure to the hazard at the time of injury, which means safeguards are in place to reduce the outcome of the exposure.

"Safety is not the absence of injuries, it is the use of effective defenses and appropriate human performance tools" John Kowalski C.S.P.,

The severity-weighted system applies a percentage weighting to a single event through a risk matrix to ensure consistency in the weighting. The weighting will be applied during the incident investigation phase and tracked through current systems. The resulting number will be applied and reported as Severity Weighted Incident Frequency (SWIF).

The severity-weighted equations are built into the current incident tracking system and the classification of injuries guidelines to ensure that the program is void of, and safe from individual discretion. The overall tracking and reporting of the severity weighted incident frequency (SWIF) will be automated and posted concurrently with Total Recordable Incident Frequency (TRIF).

For example, an injury which resulted in the worker receiving 1-3 stitches is currently reported as 1 recordable injury, under the severity-weighted system the injury would be potentially classified a **Severity Rate 2** (25% of 1), adding 0.25 to the total number which is then multiplied by 200,000 and divided by the total number of exposure hours.

Severity Rating will be based on 1-5 criteria described within the **Severity Weighting Matrix**.

Potential Severity (For any incident or potential incident check all effects)					
Severity Rating	Severity Weighting	People	Property Damage (Loss)	Environmental Impact	Public Image & Reputation
5	1.0	Fatality Permanent total disability, resulting from injury or occupational illness Lost time injury	>\$100,000	Massive effect: Persistent severe environmental damage that will lead to loss of natural resources over a wide area.	Massive effect, indicated by: Persistent, severe impact on livelihood, social and cultural assets, community security, community health, vulnerable or indigenous peoples and/or human rights infringements Impact may affect a large geographic area or population International public concern
4	0.75	Major injury or health effect >5 sutures Fracture to extremity RTW >25% modification to duties	>\$25,000-\$100,000	Major effect: Severe environmental damage that will require extensive measures to restore beneficial uses of the environment or demonstrated effect to worker or the public (human effect).	Major effect, indicated by: Persistent effects on livelihood and/or social and cultural assets, community health Adverse effects on community security, vulnerable or indigenous peoples, and/or human rights infringements, that are serious and/or at a community level National public concern
3	0.50	Substantial injury or health effect 3-5 sutures Hairline fracture to extremity distal to the joint RTW <25% modification to duties	>\$5,000-\$25,000	Moderate effect: Reportable to Outside Regulatory Agency; limited environmental damage that will persist or require cleaning up.	Moderate effect, indicated by: Persistent nuisance Local or regional public concern
2	0.25	Minor injury or health effect 1-3 sutures Hairline fingertip fracture <10% modification to duties	>\$1000-\$5,000	Minor effect: Minor environmental damage, but no lasting effect.	Minor effect, indicated by: Limited short-term nuisance or local public concern
1	0.1	Slight injury or health effect First aid treatment	<\$1,000	Slight effect: Spill or release to environment Slight environmental damage contained within the premises.	Slight effect, indicated by: Infrequent slight nuisance (nuisance to include interference with reasonable comforts and enjoyments of life, general inconvenience relating to day-to-day activities or enjoyment of land)
0	0	No injury or health effect	No damage	No impact	No impact

INJURY CLAIMS MANAGEMENT

Management of all Workplace Injury Incident Claims must be completed through the FLINT Incident Reporting process detailed below and always through our Single Point of Contact.

Injury Claims Manager
Jelaney Derkach
1 (780) 490-8679
(24 hour contact number)

Ensure the Claims Manager is contacted immediately upon discovery of an injury incident at the workplace and where possible the Supervisor must contact the Claims Manager, prior to the injured worker attending at a treatment facility

15.12 MEDICAL INCIDENT REPORTING AND WORKERS COMPENSATION BOARD (WCB) CLAIM MANAGEMENT

Policy

Upon notification of an injury, an Employer must report it to the Workers' Compensation Board (WCB) within 72 hours, (notification is: at the point FLINT Supervisor receives notice or becomes aware that a worker may have received a work related injury).

An Employer's WCB Report for a work related Injury must be completed when:

- It causes or is likely to cause, a worker to miss time from work
- A worker needs modified duties past the day of accident
- A worker requires medical attention
- An injury may result in a permanent disability
- A fatality has happened

15.13 WCB INJURY CLAIM COORDINATION / REPORTING

INTERNAL AND EXTERNAL REPORTING PROCESS

Injured Worker

1. Shall report all injury incidents to their supervisor immediately and seek first aid or medical attention where required.
2. After treatment the worker shall complete the required WCB Worker Injury Report and ensure it is filed with WCB in a timely manner. This can be done online through the WCB website.

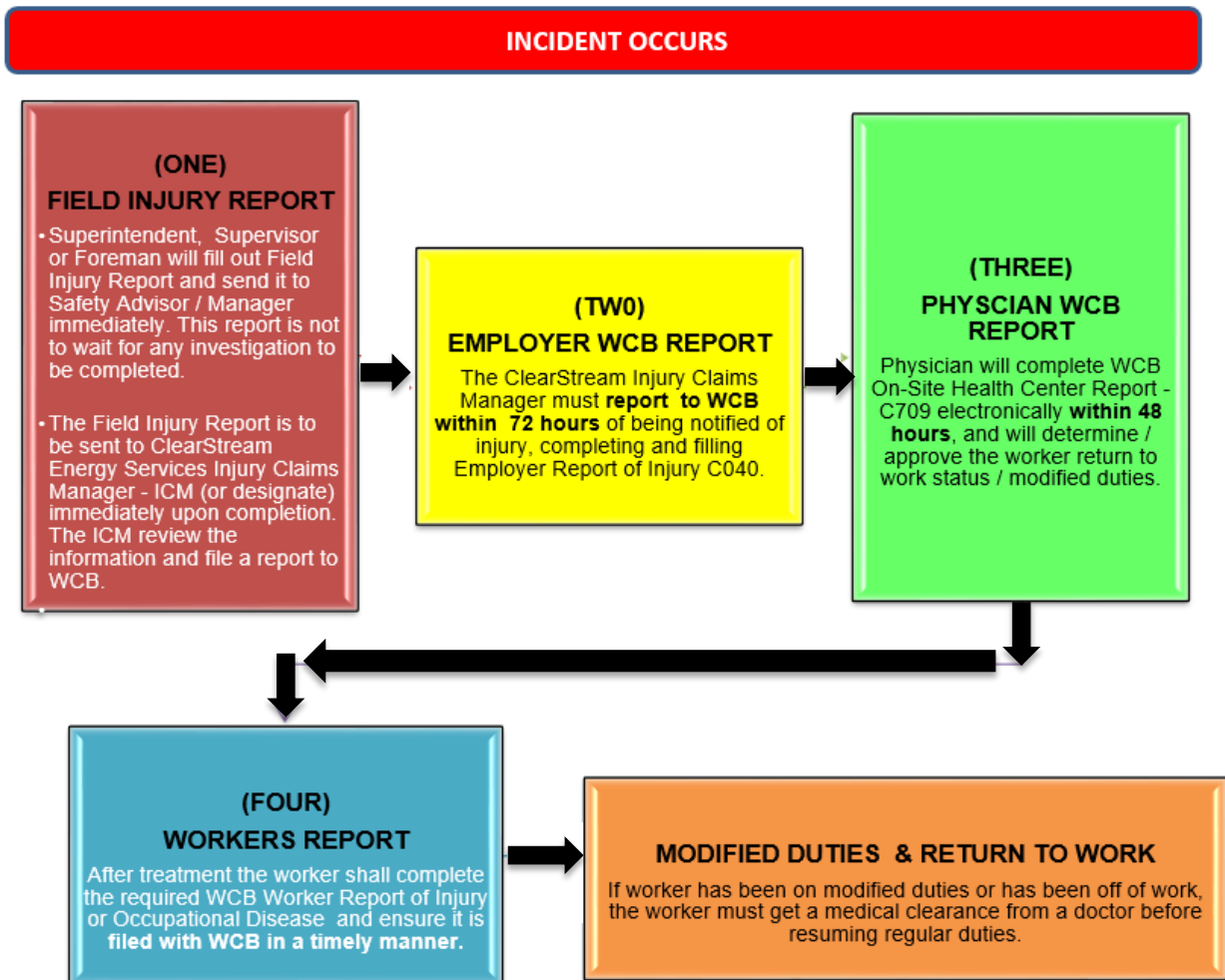
Employer - FLINT

1. When an injury incident occurs, the supervisor on site must contact the FLINT WCB Injury Claims Manager (or designate) and complete a Form 15E Field Injury Report.
2. The Field Injury Report is to be sent to FLINT Injury Claims Manager (or designate) immediately upon completion. Do not wait to complete the incident investigation report or any pending investigation. **THIS MUST BE DONE WITHIN 24 HOURS.**
3. The FLINT Injury Claims Manager (or designate) will complete an Employer's Report of Injury (WCB form C-040) and send it to the Workers' Compensation Board.

The WCB will make a decision on the claim for compensation, after receipt and review of the 3 key required WCB documents. Employers Report, Health Care Provider Report, Workers Report.

WCB Claims Adjudicator will send a letter with the decision to both the worker and FLINT.

- The FLINT Injury Claims Manager (or designate) will work directly with the FLINT Supervisor and injured worker for placement and management of injured worker in a modified duty or return to work program, as per medical clearance and WCB approval.
- FLINT Supervision will inform the Injury Claims Manager (or designate) of any change in a workers will advise the WCB of any changes in the worker’s condition, and the worker’s return to work progress.



WCB Injury Classification

Medical only – claim is processed for medical treatment when worker seeks medical treatment, but requires no modified work or time loss. Doctor is required by legislation to send in any report of work related injury, even if no modified work is needed. The doctor’s report registers a claim with WCB.

Modified Work - Duty – worker’s claim is accepted or denied by an adjudicator at WCB. This classification is for any worker **that needs modified work duties past the day of incident, but has not missed any time since date of injury.**

Lost Time Injury (LTI)– worker has missed next scheduled shift or as per specific circumstance. This may be the next day(s) after injury or down the road if worker relapses, has surgery, etc., or is laid off while still injured.

15.14 WORKPLACE SCHEDULE OF INJURY CLASSIFICATIONS

15.14.1 FIRST AID TREATMENT

- Using a non-prescription medication at non-prescription strength (For medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes.)
- Cleaning, flushing or soaking wounds on the surface of the skin
- Using wound coverings such as bandages, Band-Aids™, gauze pads, etc., or using butterfly bandages or Steri-Strips™ (Other wound closing devices such as sutures, staples, etc., are considered medical treatment.)
- Using hot or cold therapy
- Using temporary immobilization devices while transporting an incident victim (e.g., splints, slings, neck collars, back boards)
- Drilling a fingernail or toenail to relieve pressure, or draining fluid from a blister
- Using eye patches
- Removing foreign bodies from the eye using only irrigation or a cotton swab
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
- Using finger guards
- Using massages (Physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes.)
- Drinking fluids for relief of heat stress.

15.14.2 MEDICAL TREATMENT

Medical treatment is the management and care of a patient for the purpose of managing an injury, inclusive of (but not limited to) health care practitioner (Ex. Doctor) prescribing medication, sutures, setting a bone in a cast, admission to a hospital.

Medical treatment Does Not Include:

- Visits to a physician or other licensed health care professional solely for observation or counselling, or
- Conducting diagnostic procedures, such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes (e.g., eye drops to dilate pupils), or First Aid measures as defined above

15.15 RESPONSIBILITIES

Foreman/Supervisor/Superintendent shall:

- Complete FLINT - Field Injury Report and sends to FLINT Injury Claims Manager immediately after injury incident occurs, or when notified of an injury by a worker (within 24 hours)
- Attend at the health care facility/clinic and ensure health care provider (ex. Doctor) is provided with key documentation illustrating that there is a FLINT Modified Duty Program available for injured workers.
- Offers worker modified duties, have worker sign acceptance or refusal, and forward to FLINT Injury Claims Manager.
- Keeps FLINT Injury Claims Manager updated on status of worker, including return to regular work duties and date.
- Have the worker fill out a WCB Workers' Report of Injury (available on WCB website).

Note: if the injury is repetitive in nature, there has been a delay in reporting, or there has been no specific.

FLINT HSE Program Coordinator/Claims Manager shall:

- Review Field Injury Report and modified duty offer.
- Assists in coordination of modified work
- Submit WCB Employer's Report of Accident within 72 hours of injury
- Coordinates a return to work date and modified duties with the project/facility supervision, for a worker requiring modified work after missing time from work, if available.
- Forward copies of modified work offer to WCB
- Keeps WCB informed of worker's status, including return to regular work duties date.
- Appeals decisions where applicable, including work-relatedness, and cost relief application.
- Monitors WCB's case management of worker
- Updates of worker's medical status, if worker is off of work

15.16 MODIFIED WORK PROGRAM

The modified work program is intended to provide alternative work duties for workers who are injured while at work. The intent is to provide for meaningful work opportunities for injured workers during their rehabilitation until they are able to resume regular work duties.

15.16.1 Policy

- a. FLINT will make every reasonable effort to provide suitable, temporary, alternative work for an injured worker within their given work restrictions.
- b. Only suitable modified work shall be considered for the modified work program. To be considered suitable modified work, the following conditions must be met:
 - The worker's medical restrictions must be accommodated so the worker can perform the duties without endangering his/her recovery or safety, or the safety of others
 - The duties contribute to the worker's physical and vocational rehabilitation by keeping the worker active and involved in the workplace
 - The work promotes the gradual restoration to the worker's pre-accident level of employment
 - The work must be a meaningful and productive part of the employer's operations
 - The work does not create financial hardship for the worker (for example, shift changes that require additional childcare costs, unreasonable travel to another location, etc.).
- c. All modified work must comply with WCB temporary modified work guidelines
- d. Modified work must not aggravate the worker's injury or impede the healing process.

15.16.2 Responsibilities**Supervisor/Manager or Designate (Employer)**

- The Supervisor (or designate) is responsible to assign appropriate work, if available, to the injured worker once notified of the worker's injury. This must be presented in writing, (Offer of Modified Duty), which the worker is to sign accepting, or refuse, accordingly.
- The Supervisor or their designate is responsible for reporting back on all modified work cases to Area HSE Lead, HSE Manager and Incident Claim Manager, including the date when the modified work is no longer needed, and when the worker has returned to full duties.

Worker

- Must regularly report to his/her supervisor or their designate on the progress of rehabilitation, and provide copies of the medical reports, when possible.
- Inform his/her supervisor their designate of any issues or concerns.
- Ensure compliance with assigned modified work duties and conditions.
- Obtain a medical clearance when ready to return to regular duties.

- Report to the Worker's Compensation Board immediately on returning to work and on resumption of regular duties.
- Schedule any medical treatment appointments or physiotherapy so as not to interfere with the daily work schedule, whenever possible. If it must be during work hours, the appointment should be made as early or as late in the day as possible, to minimize the time away from work.

15.17 MEDICAL TREATMENT PROCEDURE

1. A worker requiring medical treatment will be provided with FORM 15G: Fitness for Work Form prior to leaving the workplace.
2. The worker must be directed to provide it to the health care provider to be completed if the health care provider is not going to issue WCB paperwork with listed abilities.
3. Wherever possible, the worker should be accompanied by a Supervisor while leaving the site to attend to a health care provider.
4. Employees eligible to accept modified work duties must return all forms to the supervisor or designate. All forms will be forwarded to FLINT Injury Claims Manager.
5. FLINT Injury Claims Manager (or designate) will forward all applicable injury information (modified duties, treatment, etc.) to the Workers' Compensation Board.

15.18 OFFER OF MODIFIED WORK

When a worker is injury at the workplace an Offer of Modified Work must be in place

1. Present a written offer of modified work to the worker (*FORM 15F: Modified Work Offer*).
2. Specifically list the job duties to be performed.
3. Specify the length of placement of the modified work, as stated on the medical report, if available.
4. Ensure the offer of modified work is signed, by both the worker and the supervisor or designate. Initial offer of modified can be signed by the immediate supervisor and HSE to avoid a delay resulting in a lost time. All following offers must be reviewed and signed by the District Manager and HSE Manager/Lead for the area.
5. Forward completed offers of modified work forms to FLINT Injury Claims Manager (or designate)

15.18.1 Refusal of Offer of Modified Work

1. If an employee refuses modified work, record the reasons for not participating and have the employee sign, if possible.
2. Forward refusal documentation to the FLINT Injury Claims Manager.
3. FLINT Injury Claims Manager (or designate) will forward the refusal to the Workers' Compensation Board, as the WCB must take into consideration the reason for refusal when determining the worker's entitlement to benefits.

15.18.2 Monitoring Workers' Progress

Once a worker is placed on modified work, the Supervisor or designate must monitor the progress of the worker's rehabilitation, and report the progress to FLINT Injury Claims Manager.

15.19 RETURN TO REGULAR DUTIES

- Encourage the worker to return to regular duties as soon as practical.
- Ensure that a medical clearance, indicating the worker is fit for regular work, has been provided by a qualified health care worker.
- Inform FLINT Injury Claims Manager (or designate) of the worker's change of work status.
- FLINT Injury Claims Manager (or designate) will report to the Worker's Compensation Board, so the claim can be inactivated.

ATTACHMENTS:

Form 15A: Incident Investigation

Form 15B: Loss Report Form

Form 15C: Near Miss Report

Form 15D: Incident Statement

Form 15E: Field Injury Report

Form 15F: Modified Work Program Offer

Form 15G: Fitness for Work Form

Form 15H: Decline of Medical Attention

Form 15I: Flash Report

Form 15J: Lessons Learned

Form 15K: Spill Report Form

Form 15L: Investigation Statement

16.0 FIT FOR DUTY

FLINT is committed to providing our Employees, Direct Service Providers, Sub-Contractors, Agency Employees, customers and the public with a safe and healthy workplace. FLINT believes that all occupational injury, illness and property damage is preventable, and that through active management of risk and at-risk behaviour, injury and loss can be eliminated from our organization.

FLINT recognizes that the use of Drugs and the misuse of Alcohol, Medications and other substances can limit an individual's ability to safely and effectively do their job. All Employees, direct service providers, Agency (ex. regulatory/auditing) employees, contractors, and Sub-Contractors are expected to perform their duties to meet FLINT, industry, and regulatory requirements.

Fit for Duty also encompasses the need to be healthy and alert on the job whether on regular duties day or night shift accordingly. Employees, workers, contractors, visitors alike must always report fit and ready to work. When there are circumstances that could pose a risk to the workplace, the worker, or other team member's supervision must be informed and appropriate action taken to eliminate the risk. Client sites requiring additional health and safety fitness testing will be completed prior to their arrival at site.

Fit for Duty management includes (but is not limited to):

- **Fatigue management** (Ex. lack of sleep and nutrition) affecting alertness and awareness on the job.
- **Medical conditions** (ex. diabetes/heart conditions) – that could affect the worker's alertness or endurance, ability to complete tasks.
- **Illness/infection control** – (Ex. flu bugs, or pandemic) – that could cause a lack of alertness, ability to focus, tiredness, or inability to complete tasks safely.
- **Psychological conditions** – that could affect the worker's alertness, ability to focus or ability to complete tasks safely.
- **Alcohol or Drug use and prescription misuse** – that could affect abilities to focus, work safely, or cause the work to take short cuts.
- **Risk Sensitive Position (RSP)** - A position or class of positions identified by the employer, normally remote from a work site but that has authority to direct safety-sensitive employees or make potentially high-consequence decisions within a hazardous work site. See also safety-sensitive position.

They include district managers, supervisors, technical experts, HSE resources, etc. who reside off-site but make safety-critical decisions and direct on-site employees conducting potentially dangerous tasks in potentially dangerous work environments.

- **Safety Sensitive Position (SSP)** – The position is one in which an individual has a key and direct role where the presence of drug or alcohol could result in a significant incident affecting the health and safety of oneself, others, or the environment. All positions that are required to work either on client sites or in FLINT operating facilities are deemed safety sensitive and are subject to testing, pre-employment, site pre-access, reasonable cause, and random testing if identified by the client.
- **Self-Disclosure** - is a process of communication by which one person reveals information specific to the use of alcohol and/or drugs about them self to another.
- **Specified Position (SP)** - A Specified Position is an executive position that the Company designates as having significant and ongoing responsibilities for decisions or actions that are likely to affect the safe operations of the Company and are subject to testing, pre-employment and site pre-access if identified by the client., and reasonable cause.
- **Zero Tolerance** - No worker shall report to work or be at work under the influence of any drug, or substance exceeding the thresholds listed within the Canadian Model 6.0 that may affect their ability to work safely.

Additional policies and procedure are in place for fatigue, medical condition issue response and illness found in other section of the FLINT Safety Management System and should be consulted, along with communication to senior staff and Human Resources (where applicable), prior to a course of action being taken. In some instances fatigued, medical (distressed), or ill workers may be removed from the workplace upon discovery of issues and concerns by supervision to protect the worker and/or other team members. Each situation is different and must be assessed by supervision. Medical assistance must be sought where demonstrated medical and illness concerns are evident.

Work Schedules/Emergency call in/Social (Business)

- All employees who are scheduled on call are expected to be capable of reporting Fit for Duty in compliance with this Policy and the applicable Program
- Emergency (Call In) - A Worker who is requested to report for unscheduled work, or a worker requested to report in an emergency situation, must not accept a work assignment if he/she has a reason to believe that his/her performance may be negatively affected by reason of the consumption of Alcohol, Drugs, Medications, or other substances.
- Social and Business Hosting - social and business hosting, involving the consumption of alcohol, will be hosted off FLINT worksite or facilities. FLINT will reinforce responsible use of alcohol at these events. Workers who attend and consume alcoholic beverages must not return to work, inclusive of attending a 3rd party hosted event.
- A key element to a successful Fit for Duty program and assurance of knowledge and understanding of the an sub element of the Fit for Duty program is training and knowledge of all employees, supervision, management, contractors, subcontractors and visitors to the A & D Policy, risk assessment process and subsequent testing process/protocol.

Work Schedules/Emergency call in (Business)

- An employee may work a maximum of 12 hours a day unless an exception occurs.
- An employee's work must be confined within a period of 12 consecutive hours per day, unless one of the following occurs:
 1. An accident occurs, or urgent work is required.
 2. Other unforeseeable or unpreventable circumstances.
 3. A variance signed by the District Manager authorizing hours up to 14 hours.
 4. A variance signed by the Area Manager authorizes hours up to 16 hours including paid travel time which is considered "work".
 5. At no time will workers be permitted to work greater than 16 hours including travel time which is considered "work".
 6. A worker may work up to 16 direct working hours and additional travel hours with authorization and arranged bus / crew van travel to the home, camp where the driver has not exceeded the 12 consecutive hours.

Rest Between Shifts

- An employee must not be required to change from one shift to another without at least 24 hours' notice and at least 8 hours' rest between shifts.

TRAINING**Supervisors and Management shall:**

- A. Understand the fundamental purpose of the guidelines and know the standards and requirements established by these guidelines found under the FLINT Fit for Duty program (Ex. A& D training provided through company HSE – Leadership Training and external course where applicable).
- B. Know the meaning of some common alcohol and drug related terms.
- C. Understand the concept of "enabling" and the importance of avoiding behaviours which allow problems related to alcohol or drug use to continue un-addressed.
- D. Know their role and responsibilities in addressing performance problems related to alcohol and drug use.
- E. Have a good ability to recognize the behaviours or conduct which may indicate performance problems related to alcohol, drug use and/or potential medical conditions.
- F. Know and clearly understand the process and steps to manage and address performance issues in general, as well as performance problems related to alcohol or drugs specifically.
- G. Know the support systems designed to assist supervisors and team members in addressing performance issues.

Workers (contractors/subcontractors/visitors) shall:

1. Have an understanding of the alcohol and drug work rule.
2. Take responsibility to ensure their safety and the safety of others.
3. Ensure they meet the work standards as part of their obligation to perform work activities in a safe manner.
4. Cooperate with the work rule and follow appropriate treatment if deemed necessary.
5. Use medications responsibly, be aware of potential side effects and notify their supervisor of any potential unsafe side effects where applicable.
6. Encourage their peers or coworkers to seek help when there is a breach of policy.

16.1 DRUG AND ALCOHOL MANAGEMENT PROGRAM

The misuse of drugs and alcohol can have a serious effect on the health and safety of workers. The objective of the FLINT Drug and Alcohol Management Program is to reduce the risk of incidents in the workplace where substance abuse or the presence of alcohol or drug may be a contributing factor or cause. To accomplish this, the Construction Owners Association Alcohol and Drug Guidelines and Work Rule are being used as the foundation of this program.

A detailed Alcohol and Drug standard and testing protocol shall be utilized to direct Managers, Supervisors, and Foreman through the process.

16.2 WORK STANDARDS**Alcohol and Drugs**

All workers on FLINT projects or persons providing work (contractor/sub-contractors/direct service providers) or services to the project shall comply with the following work standards. In the event the clients have their own standards, the more stringent will be followed.

- All employees in defined safety-sensitive roles will be pre-employment tested prior to being offered a position with FLINT. (“A safety-sensitive position is one in which an individual has a key and direct role where the presence of drug or alcohol could result in a significant incident affecting the health and safety of oneself, others, or the environment. All positions that are required to visit or work either on client sites or in FLINT operating facilities will be deemed safety sensitive and are subject to testing.”)
- No worker shall distribute, possess, consume, or use alcohol, legal, or illegal drugs on the work site or in any vehicle or any other equipment.
- No worker shall report to work or be at work under the influence of any drug, alcohol or substance that exceeds the limits established in the Canadian Model 6.1. National Safety Code drivers may have a higher requirement to have zero alcohol present while driving for FLINT.
- No worker shall test positive for any substances exceeding concentrations as specified under Policy, and as detailed in the Construction Owner Association of Alberta – Canadian Model for Providing a Safe Workplace.
- No worker shall misuse prescription or non-prescription drugs while at work. If a worker is taking a prescription or non-prescription drug for which there is a potential unsafe side effect, he or she has an obligation to report such potential to the supervisor.

Prescription Medication

Workers are expected to responsibly use prescribed and over the counter medications in accordance with the physician’s or pharmacist’s instructions. Medications of concern are those that inhibit or may inhibit a Worker’s ability to perform his/her job safely and productively. When appropriate, Alcohol and Drug testing will be conducted in accordance with the applicable Program to determine compliance with this Policy.

The following is prohibited while conducting work on FLINT business or worksites:

- Reporting for work or working while impaired/not Fit for Duty
- The possession of prescribed medications without a legally obtained prescription, and the distribution, offering or

sale of prescription medications.

- The intentional misuse of medications (e.g. using the medication not as it has been prescribed or directed by the pharmacy, using someone else's prescription medication and combining medication and alcohol use against direction).
- The use of any medication prior to or on the worksite which may impact the ability to work safely must be reviewed with supervision prior to accessing the worksite.

Workers

- Confirm through their doctor or pharmacist as to whether a medication may affect their ability to work and operate equipment safely, act responsibly and choose a safe alternative medication when available (e.g. non drowsy pain killers).
- If the medication they are using will (and/or may) affect their ability to work safely, they are required to provide their supervisor with direction from their doctor (where applicable), regarding any work restrictions.

Management/Supervision

- FLINT supervision and management reserves the right to confirm the requirement for restricted work by requesting medical confirmation of the impact of the medication on the ability of the individual to do work (worker is Fit for Duty).

Searches

FLINT Energy Services reserves the right to conduct searches of premises and worksites where there are reasonable grounds to conclude there is or has been use or possession of substances prohibited under this Policy.

Supervisors are responsible for identifying situations where an investigation is justified based on a training/ education (and certification where applicable) and a combination of indicators (evidence) such as behaviours, odour, or presence of drug paraphernalia. Supervisors are responsible for consulting with a HSE Manager, management (at a Director level or designate) who will counsel as to whether and how to initiate an investigation.

If alcohol or illegal substances are found during a search, the worksite location safety personnel, security and/or local authorities should be contacted. Confiscation, detention, or other intervention should be handled by location HSE personnel or security and/or local authorities (Ex. RCMP).

FLINT employees, direct service providers, contractors, sub-Contractors, and visitors will comply with all search provisions as set out in our work standards and where applicable.

Loss of License/Impaired Driving Charge

In the event of a loss of license (Ex. medical condition change) or impaired driving charge, any worker who regularly or periodically operates any motorized vehicle on behalf of FLINT Energy Services must immediately cease driving/operating any vehicle or equipment requiring that license and must report the change in license status to their immediate supervisor as soon as possible (ex. return to next shift).

The supervisor must follow up with management on the change in worker license status and a loss of privileges to drive, working with the FLINT human resources department for follow up on, work change status and continuance of employment.

Failure to report the charge or suspension of a driver's license will be grounds for discipline up to and including termination of employment. For direct service provides, contractors or sub-contractors failure to report a charge or suspension will be grounds for the termination of the service agreement.

16.3 WORK RULE DECISION TO TEST FOR ALCOHOL AND DRUGS

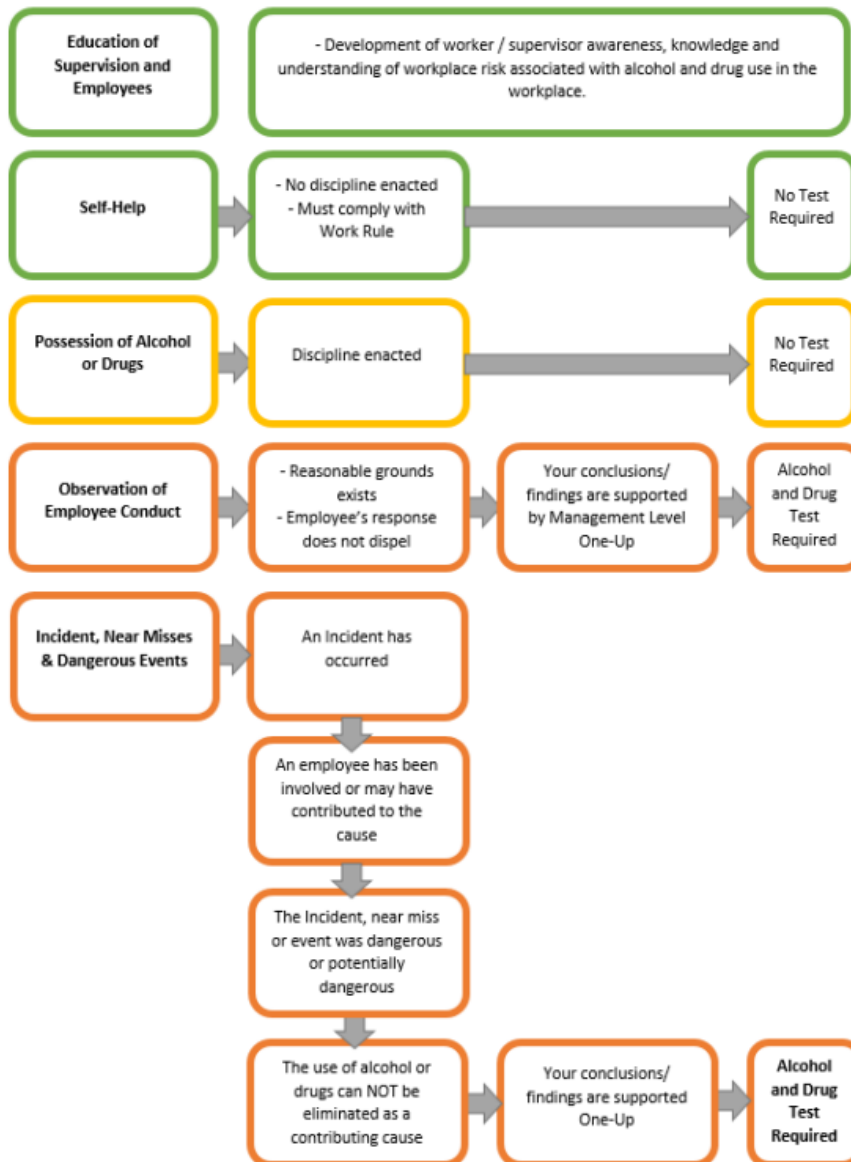
As per Construction Owners Association of Alberta (COAA) – Canadian Model for Providing a Safe Workplace there are key elements for an Alcohol and Drug Work Rule and the Implementation of a Policy.

COMMUNICATION IS KEY, first and foremost is the required education of all workers, contractors, sub-contractors, on the FLINT Energy Services Alcohol and Drug Policy thereby identifying the risks (in the workplace from the use of alcohol or drugs) and gaining worker compliance to the policy.

Please refer to the COAA Model (below) for A&D program Implementation and decision flow diagram for testing. Note this decision diagram works in concert with the approved FLINT alcohol and drug testing protocol signed by the FLINT CEO.

WHEN TO TEST A&D FLOW

(August 2023 – v2.1)



The information contained in this document is intended for general use only. Personnel using this document are responsible for ensuring that the applicable legislation and customer-specific practices, procedures and standards are complied with. If assistance is required, please contact an HSE representative.

16.3.1 Reasonable Grounds Testing

A supervisor or a manager of an employee who, after consulting with the next level of management, has reasonable ground to believe based on observation of an employee's conduct or other indicators, that an employee is, or may be, unable to work in a safe manner because of the use of alcohol and/or drugs, must request the employee to submit to an alcohol and drug test and must explain to the employee why the request is being made.

Reasonable grounds for testing include (but are not limited to) the following:

- Where the smell of alcohol is detected on an employee's breath
- Where the employee self-disclose the use of alcohol or drugs
- Where the supervisor or leader overhears a conversation at work in which an employee admits to just having consumed or used alcohol or drugs;
- Where empty liquor bottles are found in a vehicle used by the employee;
- Where the employee's appearance and behaviour indicated that the employee may be under the influence of alcohol or drugs; or
- Where the employee's failure to correct a chronic performance problem indicates that the employee may be using or is under the influence of alcohol or drugs at work.
- Site wide testing will be required for an entire work crew or business location where drugs or alcohol have been found at the worksite, through self-disclosure, or when there is an unprecedented spike in incidents related to Alcohol & Drug.

16.3.2 Post Incident Testing

A supervisor or Manager who, after consultation with the next level or management, concludes that there are reasonable grounds to believe that an employee was involved in an accident, a near miss or other potentially serious incident, must request the employee to submit to an alcohol and drug test immediately following the accident, near miss or other potentially serious incident and must explain to the employee why the request is being made.

Serious Incident

- **People:** Any serious injury (Ex. Restricted Work, Medical Aid, Lost Time)
- **Property Damage (Loss):** Any property damage or loss over \$5,000.00
- **Environmental Impact:** reportable occurrence
- **Public Image & Perception:** government intervention
- **Any "Near Miss" that fits the "Serious Incident" criteria.**

MEDICAL TREATMENT IS A PRIORITY

NOTE: Based on the severity of any injury incident to a worker, Alcohol and Drug testing may not be completed, the priority is always medical treatment of the worker injured in the workplace.

16.3.3 Return to Duty Testing

A worker may be tested upon return to work after being removed from employment for being non-compliant with this program. Testing requirements will be prescribed by the Medical Review Officer as per the treatment program.

16.3.4 Random Testing

Random testing is not currently mandatory within FLINT's fit for duty program, we do provide services for clients that may require registration into a random testing program. In the event that FLINT workers are requested to work at a client site

supporting random testing, the worker will be given the option to voluntarily enter the program and be eligible to work at the worksite or choose not to work at the worksite. For Clients with Random Testing requirements FLINT will follow the Canadian Model.

16.3.5 Occupational Health Testing

For all Client sites requiring pre-access Occupational Health Assessment, these assessments will be arranged as part of FLINT pre-access testing process and will include but not be limited to;

- Occupation specific Physical Demands Analysis (PDA)
- Baseline Audiogram as defined by provincial regulatory authorities
- Pulmonary Lung function test.

All sites will require candidates who are in the return to work process to complete an Occupational health assessment, these assessments will be arranged as part of FLINT return to work program and will include but not be limited to;

- Occupation specific Physical Demands Analysis (PDA)
- Fit for duty status communication.
- Modified work agreement if required.

All Client sites requiring reasonable cause or random Occupational health assessment, will be conducted as part of FLINT Fit for Duty program and will include but not be limited to;

- Occupation specific Physical Demands Analysis (PDA)
- Fit for duty status communication.
- Modified work agreement if required.
- Post hire Audiograms as defined by provincial regulatory authorities

16.4 TESTING PROCESS AND PROTOCOL

Refer to the FLINT Energy Services Drug and Alcohol Testing Protocol approved and signed by the CEO for consistency in the application of the FLINT A&D Policy.

If there are any concerns or issues supervision must contact management one-level-up for support and clarification.

- If requested a representative of a union or an employee organization of which the employee is a member may assist the employee with any matter arising under this alcohol and drug program policy.
- Escort the employee to the designated testing and collection service identified in the Project/Facility Specific Safety Plan. The employee needs to be escorted/supervised for post incident and reasonable grounds testing.
- If testing is required after hours, call the selected after hours testing and collection service. If required some testing and collection services will come to site.

FOR POST INCIDENT TESTING

1. Breath alcohol tests should be taken within two hours of the qualifying incident but may be taken up to (8) hours after the incident, with an appropriate written explanation as to why testing could not be done within the first two (2) hours. If the testing cannot be done within (8) hours of the incident, no alcohol testing shall be done and a record as to the incident and the reasons why no testing was done must be maintained on file.
2. Drug tests must be administered within 72 hours of the incident (where possible). A written explanation must be given as to why the testing was not done promptly after the incident.

3. NOTE: Based on the severity of any injury incident to a worker, Alcohol and Drug testing may not be completed, the priority is always medical treatment of the worker injured in the workplace.
4. If FLINT Energy Services obtains the results of a breath or blood test for alcohol, and/or a urine test for drugs, where the tests were conducted by law enforcement or others with authority to test, those results may be used to determine compliance with this Policy.

A worker must remain available for any tests. Failure to be available for tests or refusal to test will be treated in the same manner as if the tests were positive.

5. The approved testing and collection service will perform the required testing procedure with test results forwarded to the Medical Review Officer (MRO) following proper chain of custody procedures.
6. The employee will be suspended from work pending the results of his/her drug and/or alcohol tests.
7. A report must be completed for all Drug and Alcohol test requests including refusals, negative tests, and positive tests.

REFUSAL OF TESTING

FLINT Energy Services may discipline or terminate for cause the employment of an employee who fails to comply with the drug and alcohol work rule. An employee who refuses to submit to a required test, who tampers with a test sample, or obstructs the testing process, will be considered to have had a positive test result.

RESULTS OF TESTING

1. Results of breath alcohol tests will take approximately 30 minutes. Lab screening and Medical Review Officer (MRO) process can take 3-5 business days.
2. **Negative test** – No alcohol or drugs present. Employee will be reinstated and any wages lost, or costs incurred, will be paid by FLINT Energy Services.
3. **Non-Negative test** – Alcohol or drugs may be present. Employee will be suspended until results from the Lab are received, Negative results from the lab will result in the worker being reinstated and any wages lost, or costs incurred, will be paid by FLINT Energy Services.
4. **Positive Test** – Alcohol or drugs present.
5. Employees who test positive for alcohol or drug tests as reported by the Medical Review Officer (MRO) will be immediately terminated. They will not be considered eligible for employment with FLINT Energy Services.
6. Supervisors of employees who test positive will be required to assess the quality of all work completed by the employee for the previous shift cycle. (One week)

16.5 CONFIDENTIALITY

All drug and alcohol test results are confidential and are only released by the Medical Review Officer to the designated company representative or alternate. FLINT Energy Services representative or alternate may release relevant information to company decision makers as required.

16.6 ADMINISTRATION

The Industrial Drug and Alcohol program is administered by:

SUREHIRE Occupational Testing – 1-866-944-4473

ATTACHMENTS:

Form 16A- Post Incident Alcohol & Drug Testing

Form 16B- Reasonable Grounds Alcohol & Drug Testing

Standard for Random Testing

Canadian Model Version 6.0

17.0 INDUSTRIAL HEALTH

The FLINT Industrial Health Element is inclusive of the following

1. WHMIS Program
2. Chemical management program
3. Storage and Handling of:
 - a. Flammable / Combustible material
 - b. Compressed gas
4. TDG
5. Blood borne pathogens
6. Housekeeping

The overall processes and sub-elements under Industrial Health are linked to one another where following process, procedure, or practice will result in positive effects/improvements to worker health and workplace safety through the reduction or elimination of hazards.

17.1 WORKPLACE HAZARDOUS MATERIAL INFORMATION SYSTEM (WHMIS) & GLOBAL HARMONIZED SYSTEM (GHS)

The fundamental purpose of WHMIS 2015 is to ensure that every worker in every workplace in Canada is provided with information they need to know and understand about hazardous materials to which they may be exposed to in the workplace. The federal statute requires that all suppliers provide labels and SDS's with all hazardous products sold or imported into Canada.

It also describes employer and employee responsibilities for regulation compliance. WHMIS 2015 deals with hazardous substances and products that could be harmful to your safety and health either immediately or over a longer period of time.

Global Harmonized System (GHS) defines and classifies the hazards of hazardous products, and communicates health and safety information on labels and safety data sheets and, GHS is a system that will be adopted and used around the world.

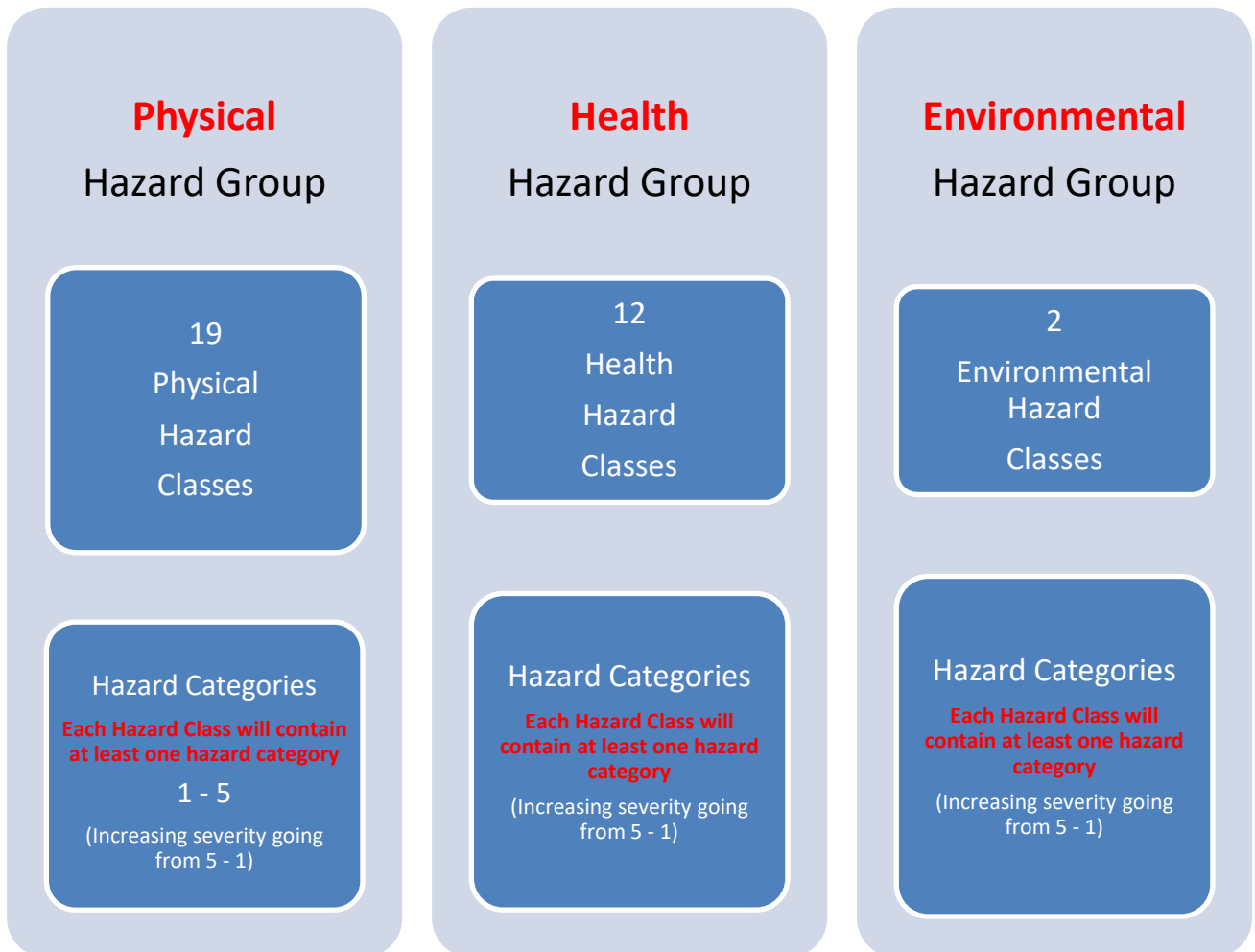
FLINT has a detailed Code of Practice, associated training materials (Monthly Safety without Compromise presentations) that have been provided to all workers. Additionally, formal WHMIS 2015 training programs are available on-line or in booklet format which each FLINT employee must complete to ensure compliance to the regulatory requirements.

The following section will provide you with brief review on WHMIS 2015 (GHS) to ensure you have a basic understanding of its three (3) key elements of the program:

1. **Classification**
2. **Communication**
3. **Worker Training**

17.1.1 CLASSIFICATION

Hazardous product classification for WHMIS 2015 is based on the United Nations Dangerous Goods System with additional information provided under hazard groups, hazard classes, and hazard categories. (Refer to the illustration below and required training literature for more details and information under the WHMIS 2015 program).



17.1.2 COMMUNICATION

WHMIS 2015 utilizes the following information to communicate the chemical hazards to all workers:

- Pictograms
- Signal words
- Hazard Statements
- Precautionary Statements
- Labels
- Safety Data Sheets

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PICTOGRAMS

There are nine new pictograms identified under WHMIS 2015 (Refer to illustration from CCOHS below):

WHMIS Pictograms 2015
Workplace Hazardous Materials Information System

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

Flame over Circle
Oxidizer

Exploding Bomb
Explosive*
Self-Reactive (severe)
Organic Peroxide (severe)

Gas Cylinder
Gas Under Pressure

Corrosion
Serious Eye Damage
Skin Corrosion
Corrosive to Metals

Exclamation Mark
Irritation (skin or eyes)
Skin Sensitization
Acute Toxicity (harmful)
Specific Target Organ Toxicity (drowsiness or dizziness, or respiratory irritation)
Hazardous to the Ozone Layer*

Environment
Aquatic Toxicity*

Biohazardous
Biohazardous
Infectious
Materials

Skull and Crossbones
Acute Toxicity (fatal or toxic)

Health Hazard
Carcinogenicity
Respiratory Sensitization
Reproductive Toxicity
Specific Target Organ Toxicity
Germ Cell Mutagenicity
Aspiration Hazard

A GHS pictogram appropriate for the hazard
Physical Hazards Not Otherwise Classified
Health Hazards Not Otherwise Classified

NOTE: No pictogram is assigned to some hazard classes e.g., Combustible Dusts and Simple Asphyxiants, and some less severe hazard categories.
*Not required by WHMIS, but may be used.

CCOHS.ca 1-800-668-4284
Canadian Centre for Occupational Health and Safety

WHMIS.org

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- **SIGNAL WORDS**
Both Danger and Warning signal words are utilized in to indicate the severity of a Hazard.
- **HAZARD STATEMENTS** - Phrases that describe the nature and degree of a chemical hazard.
- **PRECAUTIONARY STATEMENTS** - Phrases that describe recommended measures that should be taken to prevent (minimize) potential adverse effect due exposure to hazardous products.
- **LABELS** - There are two types of labels, supplier and workplace, each having distinct details as follows:

SUPPLIER LABEL (MUST CONTAIN)

1. Product Identifier
2. Pictogram
3. Signal Words
4. Hazard Statement
5. Precautionary Statements
6. Initial Supplier Identifier

* Supplemental Information (may be required)

* Note there is specific (reduce) information needs for containers under 100 ml in size.

WORKPLACE LABEL (MUST CONTAIN)

7. Product Name
8. Safe Handling Precautions
9. Reference to Safety Data Sheet.1.

Worker responsibility as it relates to communication of hazards under WHMIS 2015 includes checking the label on the container, ensuring it is legible and requesting a label replacement when required, read and understand the SDS for the product prior to use, and NEVER use a container of hazardous product in the workplace that is NOT LABELLED.

SAFETY DATE SHEETS

With the recent changes to WHMIS 2015 safety data sheet (SDS) information has been enhanced to now require 16 standardized sections of information as follows:

1. Product Identifier
2. Hazard Identification
3. Composition – Ingredients Information
4. First Aid Measures
5. Fire Fighting Measures
6. Accidental Release Measures
7. Handling and Storage
8. Exposure Controls/Personal Protection
9. Physical – Chemical Properties
10. Stability and Reactivity
11. Toxicology Information
12. Ecological Information
13. Disposal Consideration
14. Transport Information
15. Regulatory Information
16. Other Information

17.1.3 Worker Training

Worker training at FLINT will consist of (1) - formal (certification) generic training either online, self-paced booklet or a formal classroom course and (2) - site specific education.

Site specific training for all employees will include identification of hazardous products at the site, review of hazards for each (hazardous product), controls in place to protect workers, emergency procedures, and safety data sheet information and accessibility.

Once the required training has been completed and assessed through a formal quiz, FLINT will issue the worker a wallet certification card with copies of the course material, quiz and certificate retained in the workers file on site and/or electronically.

All SDS information MUST BE ACCESSIBLE in a safe, secure location that all personnel can readily identify as required, usually this information is found in a clearly marked and WHMIS - SDS binder close to the shop floor, lease or plant site activities.

17.2 CHEMICAL MANAGEMENT PROCEDURE – NEW PRODUCT INTRODUCTION TO WORKSITE

All products on site must have a detailed Safety Data Sheet (SDS), as illustrated in *Element 12 Environmental Protection of the FLINT Safety Management System* (refer to this elements for specific details) has a defined procedure for introducing hazardous products into the worksite ensuring the ongoing protection of workers and the environment from potential hazards and or releases to the environment.

This procedure is for all FLINT locations that wishes to purchase any new WHMIS hazardous products, not previously approved for use at FLINT facilities. In summary

1. **NOTIFY** - HSE management on site about potential new WHMIS hazardous product.
2. **ASSESS** – new product SDS.
3. **REVIEW AND APPROVAL** – New SDS and approve potential use on site.
4. **SAFETY DATA SHEET REVIEW** – By all workers on site, knowledge and awareness of hazards and required controls.
5. **PRODUCT CHECK** – Completed by supervision to ensure appropriate label in place and worker compliance to SDS requirements.
6. **CONTRACTOR NOTIFICATION** – Of new product on site, SDS review required, hazards and controls identified.

17.3A FLAMMABLE/COMBUSTIBLE LIQUID PRODUCT HANDLING, STORAGE, TRANSPORTATION

Flammable and combustible liquids differ in their flashpoint with flammable liquids having a flashpoint below 37.8 degrees C where combustible liquids have a flash point above 37.8 degrees C. (Gasoline/Diesel - respectively). To ensure safety for all in the workplace FLINT have document safe work practices related to the handling and storage of flammable liquids and materials commonly found throughout our operations, facilities, and contract areas (ex. Gasoline, Diesel, methanol).

In conjunction with the detailed requirements for compliance to WHMIS 2015, (as illustrated above ... Ex. proper container labeling and having a readily available 16 section Safety Data Sheet – SDS), each flammable or combustible product on site must have an approved storage container, detailed handling practices and secure storage.

More specific details on safe work practices – (SWP), will need to be reviewed and understood at point of task before handling flammable and combustible materials. The FLINT SWP has documented key requirements for:

- Hazards associated with handling flammable/combustible materials,

- Use of an approved containment (ex. certified fuel cans),
- Proper handling techniques (Ex. PPE)
- Storage of flammable/combustible material in the workplace
- Responsibilities (for all workers) when working nearby flammable liquids.

As a general summary of the requirements in the Safe Work Practice the following would apply to handling and storing flammable/combustible material:

- Smoking is prohibited within 7 meters of flammable or combustible material
- Proper (read: certified) containers must be used to storage and transport flammable/combustible material
- Flammable/combustible material must be placed in fire proof cabinets, in designated areas only
- Do not store flammable or combustible material near a heat source
- Fire suppression equipment (ex. Fire extinguisher ABC/fire hose – stand pipe), must be readily available, accessible and inspected monthly
- Incompatible material must not be stored adjacent to flammable or combustible material
- Proper PPE must be worn (ex. designed for designated task) when handling flammable or combustible material.
- Transportation of flammable/combustible material off FLINT projects, leases, shops require a current TDG certificate and a detailed manifests for the safe movement of materials.
- Refer to Safety Data Sheet prior to handling flammable or combustible material

17.3B COMPRESSED GAS HANDLING AND STORAGE

Like the requirements and standards illustrated for flammable and combustible material, the handling of compressed gases at the work site carries significant fire and explosion risk. Personnel at FLINT utilize a variety of compressed gases at our worksite, leases, or project sites such as compressed oxygen, acetylene, propane or natural gas. Whether in a certified cylinder or a gas line in a shop, safely compressed gas handling and storage must be conducted by always following document procedures or practices.

FLINT has a defined safe work practice (procedure) in place (refer to the FLINT Safety Management System on our company intra-net – ClearNet for specific practices and steps for requirements, guidelines for storage, transportation and training.

Movement of compressed gases off FLINT projects, leases, shops to another area requires the worker has a current TDG certificate and appropriate documentation when moving material in quantity (refer to the TDG Act and Regulation for specific details and regulatory compliance standards).

In general, (always refer to the SWP for Compressed Gas for more details) the following is a list of standards for compressed gas management:

- Smoking is prohibited within 7 meters of compressed gas cylinder
- Cylinders must be secured upright in a storage cabinet or shelf
- The storage facility should be protected from contact or collision by equipment and vehicles
- Oxygen cylinders must be separated 6M from incompatible material such as flammable or combustible material
- Compressed cylinders must be transported upright with valve protection cover in place
- Wear proper PPE when handling all compressed gas cylinders
- Refer to SDS prior to use of compressed gas material

17.4 TDG IN THE WORKPLACE

Under federal regulation and administered under provincial authority the Transportation of Dangerous Goods has a direct link into industrial health and the proper receiving and handling of dangerous goods at the work site. All designated TDG loads must be placard accordingly and delivered to the FLINT location by certified TDG personnel (Ex. shipping company provides TDG training).

When receiving a dangerous goods shipment, all containers must be properly labelled (WHMIS). Unlabelled containers must be refused, or until the supplier can confirm the container contents and relabelled accordingly.

Each load of dangerous goods must be accompanied by a weigh bill of lading, which must be inspected and confirmed in compliance prior to accepting the shipment.

Any containers of dangerous goods not tight or sealed and leaking fluid or material must be refused (a required dangerous occurrence report must be filed by the consignor and/or shipper of the dangerous goods).

17.5 BLOOD BORNE PATHOGENS

Where it is reasonable to expect that staff could be exposed to blood or other potentially infectious material as part of their normal job duties, a comprehensive Exposure Control Plan must be developed and implemented to eliminate or minimize the risks and hazards in the workplace. Even if contact is not likely to occur at a worksite, staff should be prepared for unexpected events. Being well prepared to deal with biohazards helps address concerns in the workplace about HIV/AIDS, and hepatitis B and C. Any staff member required to provide first aid may be exposed to blood borne pathogens and other infectious materials.

DEFINITIONS

- **blood borne pathogens:** pathogenic microorganisms that are present in human blood and can cause disease in humans, including, but not limited to, hepatitis B virus (HBV), hepatitis C virus (HCV) and human immunodeficiency virus (HIV)
- **hazardous substance:** includes a hazardous product and a chemical, biological or physical agent that, by reason of a property that the agent possesses, is hazardous to the safety or health of a person exposed to it
- **occupational exposure:** reasonably anticipated, harmful contact with blood or other potentially infectious biohazardous materials that may result from the performance of an staff member's duties
- **other potentially infectious materials:** human body fluids, (e.g., semen, vaginal secretions, amniotic fluid), any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids

MINIMIZING EXPOSURE TO BLOODBORNE PATHOGENS

Company Responsibilities:

Where a staff member may be endangered by exposure to blood borne pathogens appoint a qualified person to carry out an investigation.

Develop and implement a training program for all staff who are likely to handle or be exposed to blood borne pathogens that includes instruction on:

- how to eliminate or reduce the risk of contact with blood and other potentially infectious material.
- identification of hazards
- all hazard information disclosed by the supplier or by the employer on a safety data sheet or label

- all hazard information the Company is aware of
- safe storage, handling and disposal of blood borne pathogen sources
- emergency response procedures for blood borne pathogens

Ensure work practices eliminate or minimize the risk of unforeseen contact.

Provide the equipment, tools and personal protective equipment needed to deal with unforeseen contact.

Monitor the workplace to ensure safeguards are used and safe work practices are followed.

In case of an exposure incident, ensure:

- first-aid and medical attention is readily available
- staff know how to access first aid and medical treatment

Immediately report any incident of exposure to local Company health and safety department.

Investigate the exposure incident and develop ways to prevent similar incidents from occurring.

Ensure the records, reports or other documents are kept and maintained so they are available for examination by a safety officer and by the Company health and safety department.

Staff Responsibilities

- Attend information and training sessions.
- Use established controls and follow safe work practices.
- Use tools and personal protective equipment provided for exposure to blood or other potentially infectious material.
- Know how to get immediate first aid and medical attention.
- Report exposure incidents.
- Understand that you must not clean up spilled blood or body fluids unless you have the right equipment and personal protective equipment and have been trained to do so safely.

17.6 HOUSEKEEPING

FLINT has an established Safe Work Practice defining the requirements for keeping a worksite clear of debris or materials that present a hazard or which could contribute to an incident. Linked to applicable legislation (ex. Building Fire Code) below are some of the general housekeeping standards that need to be followed when working at FLINT:

- Ensure doorways, walkways and ladders are kept free and clear of debris
- Assess and eliminate all slippery conditions in the workplace caused by, ice, snow, or spilled material (clean it up as quickly as possible upon discovery).
- All equipment and truck cabs should be inspected and cleaned up daily, removal of debris to prevent hazard to equipment operation or a potential fire.
- Keep walking surfaces clear of tools and equipment by proper placement outside of walkways, avoiding trip hazards.
- Place tools in equipment in proper storage after use.
- Collect and dispose of waste placing them in proper disposal or recycle containers
- Conduct hazard hunts before, during and after work removing any debris, equipment or material and placed in a safe and visible location (Ex. At Risk - pallets of material placed on the ground and covered in snow overnight).
- Waste management disposal of designated hazardous waste may require (waste) profiling, appropriate TDG packaging, shipping documentation, approved transportation and disposal certification – consult with HSE personnel and applicable Acts/Regulations.

ATTACHMENTS:

- Form 17A: WHMIS Inventory List

18.0 AWARDS AND RECOGNITION

Awards and Recognition for a continuous high level of safety performance in the workplace sends a clear message about the Flint culture, our values and expectations regarding Health, Safety and Environmental performance in our company and are critical to the success of the Safety Management System.

Awards and recognition are the formal process of rewarding an employee or groups positive attitude and good efforts toward the creation and ongoing maintenance of Safety without Compromise.

All levels of supervision are encouraged to recognize the safety initiatives and efforts made by those who work with them on an ongoing basis. Recognition can be as simple as publicly thanking an employee for reporting hazards, taking the time to do a job safely, participating in the Joint Health and Safety Committees, or enforcing the obligation to refusing unsafe work.

Additionally group recognition of achievements in safety, is critical and acknowledgment of a job well done with peers in a formal safety meetings reinforces everyone's resolve to complete all task safely so we can end each and go home and enjoy what is most important in life family, friends and continued health.

Flint Energy Services tracks specific safety performance information as a means to gauge success and the subsequent award and recognition under the following areas:

- HSE Improvement Plan
- Monthly safety Statistics
- Key performance indicators (rolled up monthly and quarterly)
- Behaviour Based Observation Tracking

Operational Safety Excellence Plan

Flint has a Operational Safety Excellence Plan with key milestones documented, specific timelines set, which senior management tracks and communicates (reports back on), throughout the entire business.

Monthly Safety Statistics

Flint tracks specific safety statistics which are found in separate spreadsheets under the overall intra-net (ClearNet) for all employees to access, review and understand.

Key Performance Indicators

Flint tracks and trends key performance indicators (KPI's) with regular monthly reporting back to management, supervision and all employees on successes the reduction and/or elimination of injury incidents, equipment damage, environmental impact. KPI's include but are not limited to:

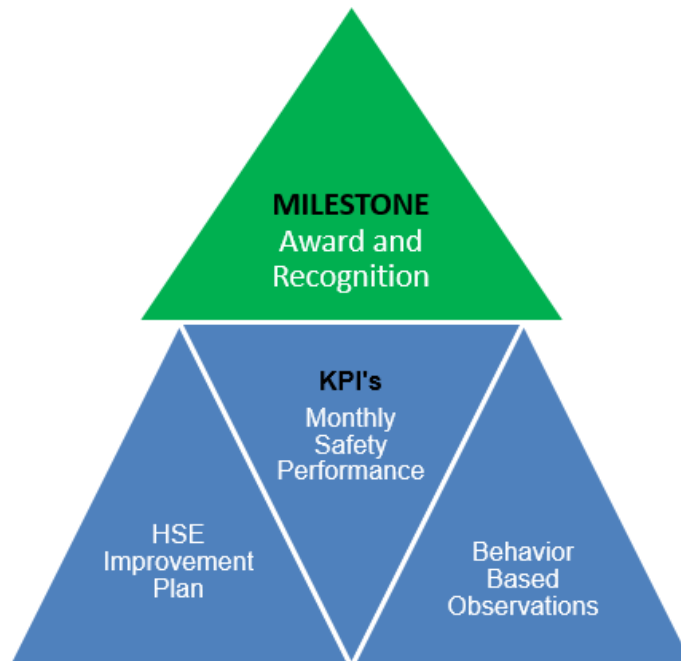
- Lost Time Injuries
- Lost Days
- Medical Aid
- Modified Work Cases
- First Aid Injuries
- Near Miss Significant Near Miss (High Risk Potential)
- Environmental Incidents
- Motor Vehicle Incidents
- Property Damage
- Equipment/Tool Damage
- Operational Upsets
- Non Conformance
- Total Lost Time Incidents
- Total Recordable Incidents
- Lost Time Incident Frequency (LTIF)
- Total Recordable Incident Frequency (TRIF)

Behaviour Based Observation

Behaviours based observations both “safe” and “at risk” are tracked, analyzed and trended for daily, weekly or monthly reporting. There is a direct focus on the safe observation as this will result in a safer workplace for all, whereas addressing at risk behaviours correct issues before they become an incident or injury event.

Annual Performance Recognition

Rolling up all of the safety performance information mentioned previously, milestones at the business and corporate level will drive out positive recognition, ideally for the entire group and/or individual where applicable. Recognition could take place in the form of a hosted BBQ, or formal event where senior leadership attends and communicates back to group accordingly. Lastly posting of safety performance success will be done corporately (under ClearNet) and locally on business site bulletin boards, office and lunchrooms alike, (refer to diagram below for elements of the milestone recognition process).



PERFORMANCE AWARDS

Individual Performance Award

During the course of day-to-day business it is/or may be appropriate to recognize individual performance. Recognition in the form of gift cards (~\$10-\$20), small items such as hats, pens, shirts, or other promotional materials can be distributed formally during shift start meetings or informally to the worker during workplace observations.

Milestone Performance Award

Safety performance information mentioned previously, milestones at the business and corporate level will drive out positive recognition, ideally for the entire group and/or individual where applicable. Recognition could take place in the form of a hosted BBQ, or recognition item at approximately \$20.00 per person.

Recognized Milestones eligible for this Recognition;

- Completion of a Turnaround without a recordable injury.
- Annual recognition of Zero TRIF.
- 100% Participation in BBO program.

CEO's "Safety without Compromise" District Award of Excellence

- Internal Quarterly Audit Score >85%
- 100% District Manager Participation in Leadership On Site Reviews
- 100% Compliance with Safety Meetings
- >75% participation in BBO Program
- Safety Data tracking up to date
- TRIF below Target.

CEO's "Safety without Compromise" Divisional Award of Excellence

- Annual COR Audit Score >85%
- >90% Participation in Leadership KPI
- 100% Compliance with Safety Meetings
- >75% participation in BBO Program
- Safety Data tracking up to date
- TRIF below Corporate Target.

CEO's "Safety without Compromise" Award of Excellence will be announced and distributed during the Fresh Start Campaigns annually.

Long Service Incentive Program

Long Service Incentive Program is designed to recognize workers who have been employed with the organization for long periods without absence.

Service awards are available at five year increments.

The program is administered by Human Resources.

19.0 RECORDS AND STATISTICS

The FLINT safety management system (SMS) is a dynamic and continually evolving based on assessment, renewed regulation, or learnings. Well maintained records provide the information necessary to assess the SMS, implement modifications, and plan for future projects. Analysis of records helps determine trends, measurement of success and drives overall improvement in safety performance.

19.1 TRAINING RECORDS

Training records for employees must be kept current and updated on a regular basis and retained electronically in the Safety Passport system. Record retention, confidentiality and destruction are strictly controlled through FLINT standard procedure.

19.2 BEHAVIOUR OBSERVATIONS

Behaviour Observation Cards (BBO) are used to track Safe and At Risk Behaviours.

All BBO cards are tallied at the business level into a BBO summary and then forwarded to HSE staff, for assessment looking at; number completed, frequency of observation, and trending followed by reporting back to supervision, management and workers alike monthly safety meetings, concluding with posting on area bulletin boards.

19.3 STATISTICS

Data collected related to health, safety, and environmental (HSE) performance in the workplace provides management with an overview of our program's activities and results.

Examining trends and setting priorities for future safety program measures, aids the various FLINT facilities and worksites to prevent or eliminate conditions or process that could lead to potential incident or injury.

These summaries will be circulated to all management levels within FLINT and must be reviewed with all workers at regular safety meetings.

The monthly FLINT facility/project HSE report will include but not be limited to (other items could be added based on location, activity and client requirements):

- Lost time (LT)
- Lost Days (LD)
- Lost Time Incident (LTI)
- (Frequency Rate)
- Restricted Work
- Restricted Work Days
- Medical Aid (MA)
- Total Recordable Incident (TRI)
- (Frequency Rate/Severity Rate)
- First Aid (FA)
- Near Miss (NM) incidents
- Hazard Identifications
- Behaviour Observations
- Behaviour Observation Frequency Rate
- Other safety related trending and measurement

Each of these areas will be tracked for each business unit and district, as well as a corporate total for FLINT.

19.4 ANNUAL SAFETY REPORT

On an annual basis, the FLINT HSE Department will prepare an Annual Report summarizing the safety successes and opportunities within FLINT from the previous year.

This report will include statistical summaries, incident summaries, training information, ongoing safety projects, successes and project plans for the following year.

19.5 PERMANENT FACILITY SAFETY FILES

Each permanent facility will maintain a safety (HSE) filing system as illustrated in Element One of the FLINT Safety Management System.

Additionally records, files, reference material and company policies are maintained on the electronic ClearNet system for all employees to access 24 hours – 7 days per week, either remotely at the jobsite or in designated company facilities or operations.

19.6 INCIDENT CLASSIFICATION

All FLINT incidents will be classified as per the FLINT Incident and Injury Classification Guide.

The final classifications of all incidents are the responsibility of the FLINT HSE Department.

FIRST AID INJURY

Any one-time treatment and subsequent observation of minor scratches, cuts, burns, splinters and so forth, which do not ordinarily require medical care. Such treatment and observation are considered first aid even though provided by a physician or registered professional medical personnel. The following are first aid treatments:

- application of antiseptics during the first visit to medical personnel
- treatment of first degree burn(s) and “minor” second degree burns treated with non-prescription medication on first visit only
- application of bandage(s) during any visit to medical personnel
- removal of foreign bodies not embedded in the eye, if only irrigation or cotton swab is required
- removal of foreign bodies from a wound, if the procedure is uncomplicated and considered non-invasive (i.e.: by tweezers or other simple technique)
- use of non-prescription medications and administration of a single dose of prescription medication.
- Administration of a Tetanus vaccination
- soaking therapy during an initial visit to medical personnel or removal of bandages by soaking
- application of hot or cold compress(es) during the first visit to medical personnel
- application of ointments to abrasions to prevent them from cracking or drying
- application of heat therapy during the first visit to medical personnel
- use of whirlpool bath therapy during the first visit to medical personnel
- negative X-ray diagnosis
- observation of injury during a visit to medical personnel.

MEDICAL AID INJURY

A medical aid injury is any injury that involves neither lost workdays nor restricted workdays but which

includes treatment by a physician, registered professional personnel, or lay persons (i.e.: non-medical personnel). Medical aid treatment does not include first aid treatment (treatment and subsequent observation of minor scratches, cuts, burns, splinters, and so forth, which do not ordinarily require medical care) even though provided by; some physician or other registered professional medical personnel. Administration of tetanus shots or boosters is not considered medical treatment. Diagnostic procedures are not considered medical treatment.

The following examples are considered to be medical aid injuries.

- treatment of infection
- application of antiseptics during a second or subsequent visit to medical personnel
- treatment of second or third degree burn(s), except ‘minor’ second degree burns treated with non-prescription medication on first visit only

- application of sutures, or the application of butterfly adhesive dressing(s) or Steris trip(s) in lieu of sutures
- removal of foreign bodies embedded in the eye
- removal of foreign object from a wound, if the procedure is complicated due to depth of embedment, size or location
- use of prescription medications (except a single dose of prescription medication)
- cutting away dead skin (surgical debridement)
- positive X-ray diagnosis (fractures, broken bones, etc.)
- chipped or broken teeth, requiring treatment by medical personnel
- admission to hospital or equivalent medical facility for treatment
- if a worker loses consciousness as the result of a work-related exposure or injury or illness, the case is at minimum a medical aid injury regardless of what type of treatment is involved

RESTRICTED WORK INJURY

A restricted work injury is an injury (excluding the day of the injury) that results in a person:

- Assigned to another job on a temporary basis
- Working at a permanent job less than full-time
- Working at their permanent job, but not able to perform 75% the normal job duties connected with it. This excludes limitations for incidental/peripheral job duties.

LOST TIME INJURY

A lost time injury is an injury that results in complete days away from work, after the day the injury occurred. An exception is time for medical assessment, including travel time, provided there is no time delay in seeking treatment

20.0 SAFETY MANAGEMENT SYSTEM AUDIT

FLINT conducts both internal and external safety management system audits on a regular basis to ensure compliance with company standards, policies, procedures, practices and government acts, regulation and codes (where applicable).

FLINT has the following leadership review, audit and inspection process that will be conducted on a prescribed frequency thereby ensuring solid compliance to our company SMS, external certification and regulatory requirements where applicable:

Description	Frequency
Leadership Site Safety Reviews	Monthly - Minimum
Internal SMS Audit	Quarterly
Internal COR Maintenance Audit	Annual
External COR Certification Audit	Every 3 Year Cycle

The terms of reference on the FLINT Safety Management System audit and compliance process is designed around integrating safety into all work we do, and build up our SMS to ensure ongoing certification and compliance to company standards, protecting people and the environment and reducing or eliminating impact to the environment.

This means that (1) Leadership Site Safety Reviews conducted by Management will first identify opportunities for improvement and corrective action plans, followed by (2) the generation of an internal SMS audit where there are identified issues or concerns, and finally (3) prepping or setting up the site or business for COR certification/maintenance audit process.

20.1 LEADERSHIP SITE SAFETY REVIEW – LSSR

Leadership site safety reviews are conducted at a minimum monthly by leadership throughout FLINT. Following a prescribed document, leadership shall inspect areas of a worksite, engage with as many workers in the area on safety performance, complete Behaviour Based Observations, and document overall compliance to our SMS.

20.2 INTERNAL SMS AUDIT

FLINT SMS Audit - Quarterly

FLINT management, supervision, HSE personnel and employees will work together to complete an internal HSE audit (assessment of the Safety Management System).

Our expectation is that our SMS Audit is aligned with the FLINT:

- Core values,
- Corporate policies, standards, rules, practices, procedures
- Meet or exceed client requirements,
- Ensuring compliance with Acts, Regulations, Codes

The SMS audit is completed in the field with results (findings, opportunities for improvement and corrective action plans) communicated back to the Area Manager, District Manager, Director of HSE and Project/Site Manager, with a copy to Corporate Safety Department.

The internal audit which is conducted quarterly for each business unit/are and is inclusive of two parts:

Part 1 - Worksite Audit

The FLINT **Worksite Audit** will include an assessment of the following elements:

PSSP, FLHA, Orientation, Tools and Equipment, Mobile Equipment, Policy/Procedure/Practice, Jobsite Conditions, Designated Drivers, Drivers operating Equipment > 4,500 KG, Use of Vehicle Safety Devices, CVIP, Housekeeping, Working at Heights/Scaffolds/Fall Protection, Compressed Gas, Electrical, Rigging & Hoisting, Ground Disturbance, Fire Prevention, Materials Storage, PPE, Lockout & Isolation, Confined Space, Hot Tap, Pipe Stands, Mobile welding, Health Control & Services, Job Trailer & Office Facilities.

Part 2 - HSE Audit

The FLINT HSE audit of the SMS covers the following 12 sections (refer to the HSE audit form for specific details):

1. Emergency Response
2. New Hire Orientation
3. Competency Based Training
4. Behaviour Based Observations
5. Pre-Job and Task Assessment
6. Shift Start and End
7. Safety Meetings
8. Joint Health and Safety Committee
9. Worksite Inspections
10. Incident Review
11. Subcontractor Management
12. Worksite and Regulatory Audit – Score

Certificate of Recognition - COR Maintenance Audit

An internal COR audit is conducted annually (with certified company auditors) at the applicable FLINT business. Referred to as a maintenance audit (ex. COR External certification achieved in year 1, year 2 and 3 maintenance audits completed internally by the business).

COR audits are conducted utilizing three distinct processes of Documentation - Interviews - Observations (D.I.O.). Auditors will assess, written Documentation, Interview personnel to verify understanding of requirements in the FLINT SMS documentation, followed by Observation in the field, shops, yards, offices, and facilities to validate consistent use of the SMS, policies, procedures, practices and standards accordingly.

Finally, an internal COR audit report is generated with gaps identified and potential corrective action to be implemented to close the gaps.

20.3 EXTERNAL SMS AUDITS

External Certificate of Recognition (COR) audits are conducted on a 3 year cycle with an outside certified auditor through standard audit protocol inclusive of the following elements. Depending on the business location, the certifying partner will change. The audits will vary slightly but in general include a review of the following elements:

COR Audit

- Health and Safety Policy
- Workplace Hazard Management and Control
- Safe Work Practices
- Safe Job Procedures
- Company Rules
- PPE
- Preventative Maintenance
- Training and Communication
- Inspections
- Investigation and Reporting
- Emergency Preparedness
- Records and Statistics
- Legislation
- Joint Health and Safety Committee

20.4 WORK SITE INSPECTION

FLINT management, supervision and employee will conduct and/or participate in regular safety inspections, documenting findings and developing corrective action plans to eliminate or reduce the risk of hazards throughout the businesses being assessed. Inspection reports will be posted on bulletin boards near break rooms and office areas.

ATTACHMENTS FORMS:

SMS Quarterly Internal Audit