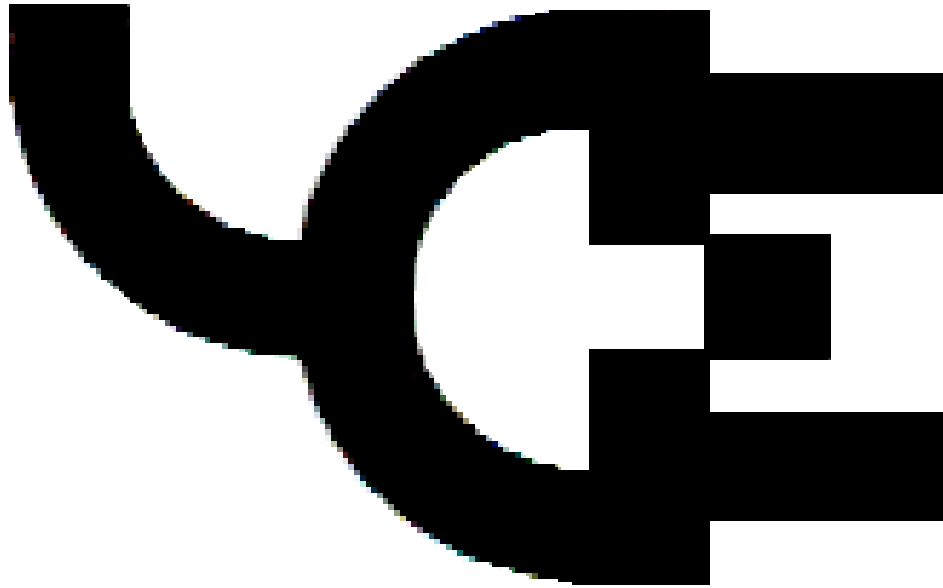


INTERLAKE ELECTRIC LTD.

Sub-Contractor Safety Orientation Handbook



Certificate # 37609-10

Sub-Contractor's Safety Orientation Handbook

Table of Contents

Foreword

Emergency Numbers

- **Company Health & Safety Policy**
- **Health & Safety Responsibility & Accountability Policy**
- **Company Safety Rules & Regulations Policy**
- **Personal Protective Equipment (PPE)**
- **Musculoskeletal Injury Prevention Policy (MSI)**
- **Harassment Policy**
- **Violence Policy**
- **Disciplinary Policy**
- **Workplace Hazardous Materials Information System Policy (WHMIS)**
- **Sub-Contractors/Trades Safety Policy**
- **Sub-Contractors Orientation Guide**
- **Sub-Contractor Requirements Prior to Job Start-up**
- **Sub-Contractor Safety Orientation/Agreement Form**
- **Sub-Contractor Safety Orientation/Agreement Form – Site Orientation**
- **Sub-Contractors Compliance Declaration**

Foreword

The policy of Interlake Electric Ltd is to provide a safe and healthy workplace environment. In order to give all sub-contracted workers and visitors of our project work sites consistent and complete safety information, a copy of this orientation handbook shall be distributed to all sub-contractors and visitors on all of Interlake's jobsites.

This handbook contains Interlake Electric's Safety policies, rules, regulations and requirements pertaining to jobsite operations. This safety handbook does not replace Interlake Electric's current General Safety Program Manual. All jobsites have a current Interlake Electric's General Safety Manual, required MSDS information, as well as the relevant Safety and Health Legislation for the province they are working in, i.e., Manitoba Workplace Safety and Health (WSH) Act Chapter W210 and WSH Regulations 217/2006.

The information in this handbook is intended to enhance the applicable Federal and/or Provincial Workplace Safety and Health Act(s), and/or Regulations, as they represent a minimum acceptable standard that is to be adhered to and maintained throughout and until project completion. Interlake Project managers, supervisors and employees will not tolerate, or participate in practices or procedures that do not meet our Safety and Health program requirements

EMERGENCY NUMBERS

AMBULANCE.....911
POLICE.....911
FIRE DEPARTMENT.....911
HYDRO EMERGENCY.....MB 888-624-9376
Wpg 480-5900
WORKERS COMPENSATION.....855-954-4321
WORKPLACE SAFETY & HEALTH.855-957-7233
AFTER HOURS....957-7233

Company Health and Safety Policy

Introduction

Interlake Electric is committed to providing and maintaining a safe and healthy workplace for its employees. All safety documents are available in either paper copy or electronically on SiteDocs.

Our Objective:

- To provide quality, reliable service to our customers while eliminating accidental injury and risk of occupational disease to workers, as well as damage to property and equipment.
- ILE commits to working in a spirit of consultation and cooperation with all employees.
- To achieve this goal, the full cooperation of all personnel is necessary.

Senior Management is responsible for the Health and Safety of all employees.

- To accomplish this, management will identify, control and/or eliminate known hazards, which can result in personal injury, illness, property damage or negative environmental impact.

Supervisors are responsible and accountable for the Health and Safety of the workers assigned to them.

Supervisors shall ensure that:

- Workers are properly trained to do their jobs safely
- Workers comply with ILE policies
- Workers follow safe work practices and procedures
- Workers comply with applicable rules and regulations

Workers are ultimately responsible for their own safety, and shall:

- Comply with all legislative regulations:
 - **Right to Refuse** – work that is unsafe
 - **Right to Know** – about hazards you may encounter
 - **Right to Participate** – in your own safety and health
 - **Right to Protection Against Discrimination** – exercise rights without punishment
- Comply with all company rules, policies and procedures
- Report all unsafe acts or conditions promptly to their supervisor or Foreman

All Employees are entitled to:

- Work in a workplace that is safe and healthy and free from any known hazards where possible/or where hazards have been controlled
- Work in a workplace which is free from harassment and violence
- Orientation as required
- Training as required

The success of our Health and Safety Program requires the dedication, commitment and participation of **all** personnel working together.

This policy and procedure is to be reviewed, dated, and signed annually by Senior Management.

Scott Campbell, President

January 4, 2022
Date

Health and Safety Responsibility and Accountability Policy

Introduction

Interlake Electric is committed to the safety and health of all its employees in a safe and hazard free workplace.

Senior Management's Responsibility:

- Provide a Health and Safety Policy statement related to the Health and Safety Program. The statement is the commitment and philosophy that sets the Company's expectations for Safety Performance.
- Provide information, instruction, and assistance to all Supervisory staff in order to protect the health and safety of our employees.
- Ensure that all supervisory staff has a good understanding of the Company Accident Prevention Programs as well as relevant Safety and Health Legislation.
- Provide all of our employees with the skills and training needed in the proper use of; tools, equipment, mobile equipment and any Personal Protective Equipment required to complete their jobs safely.
- Ensure that our employees are supplied with, and use well-maintained tools, equipment, mobile equipment and any Personal Protective Equipment.
- Provide ongoing Health and Safety Training.
- Monitor Supervisors and their projects and hold them accountable for their individual safety performance.
- Ensure that all Safety Policies and Procedures are administered and enforced.
- Maintain control of the Health and Safety Program.
- Set a good example.

Supervisor's Responsibility:

- To know and apply the Company's Health and Safety Policy and relevant Safety and Health Legislation.
- Ensure and maintain the highest standard of performance with respect to Health and Safety. The Supervisor will be held accountable for the safe performance of employees in their charge.
- Provide safe working conditions for all workers under their supervision.
- Ensure that all employees are educated to work in a safe and healthy manner and that they use all personal protective equipment, protective devices and procedures required by the company and provincial legislation.
- Hold weekly Safety meetings for duration of 15 minutes.
- Accompany Workplace Safety and Health inspectors during inspections.
- Be aware of and advise all employees of any potential or actual hazards and risks associated with the job and how to isolate, prevent, or remove them. (Pre-Inspection)
- Arrange for medical treatment as needed, in case of injury or illness, including transportation to a doctor or hospital.
- To report all accidents immediately; to investigate all accidents; and to advise management on how to prevent similar accidents.
- Carry out regular and required inspections of workplaces to ensure safe and healthy environments.
- Work in cooperation with other project supervisors in determining safe practices, enforcing their observances, developing procedures for dealing with violations and developing other safety and accident prevention programs.
- Maintain good housekeeping standards.
- Enforce all established Company Health and Safety rules and procedures as well as Provincial Safety and Health Legislation. Take corrective action as necessary to ensure consistent compliance.
- Set a good example.
- On jobsites, the **Journeyman are the Supervisors.**

Safety Representative's Responsibilities:

- Attend worker Safety Orientation meetings:
- Familiarize themselves and comply with Safety Legislation & Regulations
- Familiarize themselves with Safety Representative Legislation responsibilities as outlined in the WSH Act Chapter W210, Article 41
- Assist supervisor/foreman in conducting and /or conduct JSA's and/or inspections
- Participate in, or conduct Tool Box Safety meetings
- Work with the supervisor/foreman to ensure a safe and hazard free work environment
- Act as a liaison between employer/Safety Officer and workers
- Meet/talk with the Safety Officer on regular intervals to discuss/resolve any safety concerns
- Participate in any inspections or investigations that arise on the work site

Employee's Responsibilities:

Legislated Rights:

Right to Refuse- work that is unsafe

Right to Know – about hazards you may encounter in the course of work assigned

Right to Participate – in your own safety & health

Right to Exercise – without punishment

- To read, understand and comply with the Company Health and Safety Program Policies and Procedures.
- To wear and use Safety equipment, devices and Personal Protective Equipment.
- To promptly notify their immediate Supervisor of any unsafe acts or conditions.
- To promptly report all accidents, incidents, near misses, and injuries to their immediate Supervisor.
- Carry out their work in a responsible manner that will not create a further hazard to their own health and safety or the health and safety of other employees.
- On jobsites, the apprentice is the **Safety Representative**

Sub-Contractor's Responsibilities:

- Comply with all WSH safety legislation and Interlake Electric's General Safety Program (available on site)
- Ensure all workers have received Interlake Electric's safety orientation
- Advise all their workers and sub-contracted companies/workers of the safety rules and regulations and ensure strict compliance
- Before commencing work at a project contact the Project Supervisor/foreman for instructions regarding operating hazards and applicable safe work instructions specific to the worksite
- Provide education, training, and enforce the use of applicable PPE
- Immediately investigate and report all incidents and injuries, and investigate the lost time incidents to Interlake Electric
- Make arrangements with the Project Supervisor/Foreman and familiarize and test their workforce concerning emergency procedures
- Immediately correct any unsafe conditions or acts observed of their workers or subcontracted workers under their area of responsibilities
- Immediately report to the Project Supervisor/Foreman any unsafe acts and conditions observed on the project
- Cooperate with all safety representatives having jurisdiction at the job site
- Contact the Project Supervisor if they have any doubts regarding the meaning or interpretation of the Interlake Electric's General Safety Program
- Conduct a weekly safety meeting with their workers, document the meeting and submit a copy of the Minutes to the Project Supervisor/Foreman
- Attend all Site Safety and Health Committee Meetings when required
- Check in upon arrival at job site(s) with the Job Supervisor/Foreman

General Safety Rules & Regulations

Introduction:

Personal and general safety rules are intended to reduce and prevent injuries or damage to people and property. The following listed rules are an integral part of Interlake Electric's Safety Program and shall be adhered to by all employees. All PPE, tools, and equipment must be CSA approved.

Personal Safety

- Every individual is responsible for safety
- All employees shall comply with ILE's Safety program; non-conformance will be reported by the Supervisor.
- Report all injuries, incidents/accidents, "near misses" or damage to property/equipment, no matter how slight, to the jobsite Supervisor.
- Injuries requiring first aid shall be reported and be treated immediately.
- Approved (CSA) hard hats and safety footwear shall be worn at all times on all job-sites.
- Approved safety glasses or face shields shall be worn when there is a risk of foreign objects entering the eye. These conditions may include but not limited to the following: - Drilling - Chipping or grinding - Working with hazardous materials - Working with live electricity - When using powder actuated tools
- When on a jobsite or in the shop (other than the office), employees are to wear (minimum) full-length pants and T-Shirt or long-sleeved shirt.
- Hand tools shall not be used for any purpose other than intended, all damaged or worn shall be promptly repaired or replaced
- Power tools shall be operated only by authorized personnel, with manufactured guards "in place"
- All electrical hand tools shall be grounded or double insulated
- Explosive/powder actuated tools shall be used by person who have been instructed /trained
- Compressed gas cylinders shall be secured in an upright position at all times
- Welding or burning operations shall be carried out only by authorized personnel with appropriate individual protective equipment
- Horseplay, fighting, etc. are forbidden on all job-sites.
- Walk carefully at all times. Run only in an emergency.
- Wearing rings, bracelets, or loose, hanging jewelry on jobsites or while working in the shop is prohibited to prevent accidents, injuries or electrical shock.
- Consumption of alcohol and/or illegal drugs or coming to work under the influence is strictly prohibited.
- All employees shall use proper lifting techniques.
- PPE is required if machinery is being used or work is in progress in the immediate area.
- Cell phones are not to be used during work time, with the exception Supervisors, Safety Officer & Senior Management. If a worker is waiting for an important call, they can talk to the Supervisor and may be allowed to answer a call.
- iPods or loud music is not allowed during work hours, as workers need to be able to hear clearly.

Personal Protective Equipment (PPE) Policy

Introduction

Interlake Electric recognizes the hazards related to the electrical and construction industry and will protect its employees by having them use **Personal Protective Equipment (PPE)** that meets all CSA standards.

Purpose

The purpose of Personal Protective Equipment (PPE) is to minimize the risk of injury to employees. PPE is used when administrative and engineering controls are unable to reduce the hazard to workers.

Personal Protective Equipment generally falls into two categories.

Basic

PPE in this category should be worn at all times by persons entering a construction project site. The PPE required are as follows:

- Hard Hats
- Safety footwear
- Appropriate clothing

Specialized

PPE in this category is designed for specific jobs. The following is a list of PPES that may be required to complete a specific job safely.

- Full body harness, lanyard, and shock absorber
- Face shield
- Welding mask and gloves

Along with the previously mentioned PPE, Interlake Electric will supply:

- Safety Glasses/goggles
- Hearing Protection
- Dust Masks
- Hard-Hats
- Safety Vests
- Cut resistant gloves

Management

- Will ensure the availability of basic and specialized Personal Protective Equipment (PPE) to all employees.
- Will ensure that all specialized and basic PPE is CSA approved and free of defects or damage.
- Will ensure employees are trained in the purpose and use of all PPE.
- Will inspect ILE's safety equipment quarterly.

Employees

- Shall wear PPE, as the job requires.
- Shall inspect all PPE prior to use and also quarterly to ensure that the equipment is in good condition.
- Shall inform the employer of the need for Specialized PPE when the need arises.

Proper Fitting/Inspection/ & Maintenance of PPE Procedure

Head Protection

- Adjust headband size so that headwear will stay on when the wearer is bending over, but not so tight that it leaves a mark on the forehead. Do not put anything between the suspension and the shell. There must be a clearance inside the headwear while it is being worn. In case of a blow to the head, that space helps absorb the shock.
- Inspect and replace a shell that shows signs of wear, scratches, or gouges. Shells exposed to heat, sunlight, and chemicals can become stiff or brittle. A visible pattern of tiny cracks may develop. Over time, weathered hats can become dull in color or have a chalky appearance. Replace headwear when any of the above signs of wear start to appear. Replace headwear that has been struck, even if no damage is visible. Hard hats should be inspected before each use.
- Ensure that the suspension is in good condition. Look for cracked or torn adjustment slots, frayed material, or other signs of wear. Check the suspension lugs carefully. Long periods of normal use can damage the suspension. Perspiration and hair oils can speed up the deterioration of suspension materials. Replace the suspension if it has torn or broken threads.
- Hardhat shells may be scrubbed with a mild detergent and rinsed in clear water approximately 60° C.

Foot Protection

- Proper fitting footwear grips the heel firmly and allows freedom of movement for the toes.
- Inspect foot protection monthly, checking for tears, holes, and other defects.
- Keep footwear as clean as possible and store in a cool, dry place.

Eye Protection

- Wear safety glasses so that the temples fit comfortably over the ears. The frame should be as close to the face as possible and adequately supported by the bridge of the nose.
- Inspect eye protection before each use. Inspect for cracks or scratches that would impair eyesight, and other defects.
- Clean eye protection with mild soap and water. Do not use ammonia, alkaline cleaners, abrasive cleaning compounds, or solvents.

Hearing Protection

- With foam ear plugs, roll plug in fingers, insert, and hold for 10 seconds. Adjust if necessary.
- For hard hat earmuffs, insert the headband into the hard hat's slots until they snap into place. When in use, the wire bands must be pushed inward until you hear a "click" on both sides, indicating a shift from "stand-by" to "usage" position. Make sure the cups and wire bands are not in contact with the inner lining or the edge of the hard hat when in the "usage" position, otherwise this may lead to sound leakage.
Note: In certain instances, it may be necessary to wear both the ear plugs and the ear muffs.
- Inspect ear muffs before each use for cracked or worn parts and replaced as needed. Typical life for foam cushions is 6 months.
- Clean the outside of the earmuff regularly with soap and lukewarm water. Do not immerse in water. Use a soft brush to remove skin oil and dirt from the ear cushions. Ear muffs should not be stored in temperatures over 55° C, such as a dashboard.

High-Visibility Apparel (Vests, T-shirts etc.).

- Safety apparel should sit correctly on the body and have no loose or dangling components. It should be comfortable to wear and be lightweight.
- Replace garments that show signs of wear and tear or soiling as it will no longer be able to provide acceptable levels of visibility.

- Keep high visibility apparel clean (follow care instructions on the garment). Dirty reflective materials provide lower visibility.

Fall Protection

- Hold harness by the back D-ring. Shake harness to allow all straps to fall into place. If waist and/or leg straps are buckled, release straps and unbuckle at this time. Slip straps over shoulders so D-ring is located in middle of back between shoulder blades. Pull buckle portion of leg strap between legs and connect to opposite end of leg strap. Repeat with second leg strap. Connect waist strap if present. Waist strap should be tight, but not binding. After all straps have been buckled, tighten all buckles so that harness fits snug, but allows full range of movement. If harness contains a chest strap, make buckle connection, position in mid-chest area and tighten to keep shoulder straps taut. To remove harness, reverse procedure.
- Equipment should be inspected before each use. Examine all webbing on both sides and from front to end. Flex the webbing over your fingers, bending it to expose any signs of damage. Check webbing, straps, and reinforcing points carefully for wear and tear from fastening and unfastening buckles. Look for cut, pulled, or broken stitches, or frayed or damaged strands in the woven web. Broken webbing strands generally appear as tufts on the webbing surface. Discolored, fused, brittle, or melted fibers may be signs of chemical, paint, solvent, burning, or heat damage.
- Inspect all buckles, D-rings, and other metal components for cracks that may signal the beginning of metal fatigue. Also check for sharp or rough edges that could cut webbing, rust, or other corrosion, distortion, or other signs of wear. Check the metal wear pad at the base of D-rings and make sure the D-ring pivots freely. Tongue buckles should have rollers that turn freely; tongues should not be bent out of shape, should move freely back and forth, and should overlap the buckle frame. Check that friction or quick-release buckles are not bent or distorted and engage correctly. Locking snap hooks and carabineers should function smoothly and not be bent or wobbly. Check that the spring closes the keeper (latch) securely against the snap nose.
- Locking snap hooks should hold the keeper in its closed position.
- Check the D-ring pad to ensure there are no cracks, rips, or deformations.
- Make sure rivets hold tightly and have not pulled through webbing. Rivets should not be bent; bent rivets will fail under stress. Pitted rivets indicate chemical damage.
- Grommets must be tight, not distorted or broken. Check for corrosion, dents, sharp edges or cracks. Discard a unit with missing grommets or extra holes punched or cut into it.
- Check that rope is free of knots and is consistent in diameter. Discard a knotted rope lanyard.
- Examine the rope from end to end, rotating it as you go, and separating the strands to look for worn, broken, or cut fibers. Look for damage that might be caused by welding, chemicals, or paint, or by exposure to heat sources. Surface dirt and grime should be removed by sponging with a solution of mild soap and cold or warm water. Equipment should be wiped with a dry clean cloth and hung to dry out thoroughly, away from direct sunlight or excessive heat. Equipment should be stored in a clean, dry environment, free of corrosives and harmful fumes and out of direct sunlight

Musculoskeletal Injury (MSI) Prevention Policy

Introduction

It is the policy of Interlake Electric to ensure all employees are aware of or advised of any work activity that creates a risk of musculoskeletal injury.

Supervisors on jobsites are charged with the responsibility to conduct a risk assessment (JSA's) for any task where the worker may be subject to a musculoskeletal injury. On the outcome of the assessment, the Supervisor will implement control measures to eliminate or reduce the risk of musculoskeletal injury as far as is reasonably practical.

A Musculoskeletal Injury (**MSI**) is an injury of the muscles, tendons, ligaments, joints, nerves, or related soft tissue that may be caused or aggravated by work. Types of injuries include sprains, strains, and inflammation.

Signs and Symptoms

Signs of **MSI** (what you see) include swelling, redness, and loss of joint movement.

Symptoms of **MSI** (what you feel) include aches and pains, numbness, tingling, soreness and burning.

Signs and symptoms of **MSI** may appear suddenly (e.g., from a fall) or they may appear gradually over a longer period of time.

Risk Factors

A risk factor is something that may cause or contribute to an injury.

Risk factors for **MSI** include:

- **Awkward Posture:** When joints are used outside a comfortable range of motion such as reaching to a high shelf, hanging lights, installing plugs, bending to pick up a paper from the floor, or twisting to grasp behind.
- **Local Contact Stress:** When a worker contacts a hard or sharp object or surface such as a tool digging into hand, or worker is kneeling.
- **Static Posture:** Static postures occur when muscles have been held in one position for too long, such as carrying a heavy box over a long distance, holding a light fixture to be installed, or crouching to install plugs.
- **Repetitive Motion:** Performing the same sequence of actions for an extended period of time with little or no change in the muscles used.

Reducing the Risk:

- **Improve your Posture:** Take the time to move and adjust yourself and/or equipment to get in a better position
- **Change postures and activities often:** Do quick stretches, adjust your chair or equipment, or perform another task
- **Reduce contact stress:** Use padded gloves or kneepads, etc. as needed
- **Reduce frequency:** Intersperse a variety of tasks throughout the day, alternate hands
- **Select the right tool for the job:** Use the proper tools and as they are intended to be use

Control Measures:

- Make available and maintain equipment that is designed to reduce or eliminate the risk of **MSI** injury
- Develop and implement safe work procedures
- Implement work schedules that incorporate rest and recovery periods, change to workloads or other arrangements or altering work and/or workers;
- Provide applicable PPE

Responsibilities:

- Interlake Electric's Safety and Health Committee Reps., along with the Safety Officer and Senior Management, when necessary, will be responsible for assessing the risk of **MSI** injuries as well as developing appropriate control measures. All developed procedures and practices will be available in the Safe Work Procedures Manual. Supervisors will be responsible for monitoring the effectiveness of all control measures implemented. Where the monitoring identifies that a risk of **MSI** is still present, further measures **MUST** be implemented ASAP.

Harassment Policy

Introduction

Interlake Electric believes all employees, including sub-contractors and visitors, have the right to work in a safe environment free of harassment. ILE will take all reasonable measures to ensure that no worker(s) is exposed to harassment at the workplace by enforcing a **NO TOLERANCE** policy. Violators of this policy will be subject to disciplinary action in accordance with ILE's developed procedures.

ILE's policy is not intended to discourage or prevent the complainant from exercising any other legal pursuant to any other law. Any worker has the right to file a complaint with the Manitoba Human Rights Commission. ILE will endeavor to work in a spirit of consultation and cooperation with all workers to achieve a respectful work environment for all.

Every employee is entitled to a workplace free of harassment

Harassment is defined as:

- Objectionable conduct that creates a risk to the health of a worker, or
- Severe conduct that adversely affects a worker's psychological or physical well-being.
- Conduct is considered to be objectionable if it is based on race, creed, religion, color, sex, sexual orientation, gender-determined characteristics, marital status, family status, source of income, political belief, political association, political activity, disability, physical size or weight, age, nationality, ancestry or place of origin.
- Conduct is considered to be severe if it could reasonably cause a worker to be humiliated or intimidated and is repeated, or in the case of a single occurrence, has a lasting, harmful effect on a worker.
- Objectionable or severe conduct includes a written or verbal comment, a physical act, gesture, or display, or any combination of these.

Harassment Procedures:

Making a Complaint:

- All employees/workers must report harassment complaints to their immediate Supervisor upon occurrence, either in writing or in person
- The complaint will involve describing the event in detail
- All harassment complaints will be documented and investigated by the Supervisor in conjunction with Senior Management, Safety Officer and Safety Committee Reps., while maintaining strict confidentiality.

Complaint Investigation Procedure:

- ILE's Senior Management and the Safety Officer will be charged with the responsibility of conducting investigations.
- Details of the investigation will be documented, interviews may be conducted
- The complainant and the alleged harasser will be informed of the results of the investigation, while maintaining strict confidentiality.

Investigation Findings:

- All findings and details of the investigation may only be disclosed if particulars are necessary to further continue with the investigation of the complaint, take corrective action, or are required by law.
Appropriate action will be based on the findings

Violence Policy

Introduction

Interlake Electric believes all employees, including sub-contractors and visitors, have the right to work in a safe environment free of violence. ILE will take all reasonable measures to ensure that no worker(s) is exposed to violence at the workplace by enforcing a **NO TOLERANCE** policy. Violators of this policy will be subject to disciplinary action in accordance with ILE's developed procedures.

ILE's policy is not intended to discourage or prevent the complainant from exercising any other legal pursuant to any other law. Any worker has the right to file a complaint with the Manitoba Human Rights Commission. ILE will endeavor to work in a spirit of consultation and cooperation with all workers to achieve a respectful work environment for all.

Every employee is entitled to a workplace free of violence

Violence is defined as:

- The attempt or actual exercise of physical force against a person
- Any threatening statement or behavior that gives a person reasonable cause to believe that physical force will be used against that person

Violence Procedures:

Making a Complaint:

- All employees/workers must report to their immediate Supervisor, any signs of violent behavior that is perceived to be threatening in nature which poses potential risk to their own or others safety or health.
- The complaint will involve describing the event in written detail to the Safety Officer and Senior Management
- All violence complaints will be documented and reported within 24 hours to ILE's head office.
- An investigation by the Supervisor in conjunction with Senior Management, Safety Officer and Safety Committee Reps., while maintaining strict confidentiality, will take place ASAP.

Reporting an Incident Procedure:

Employees:

- Move to a safe location and report the incident to your Supervisor immediately
- Provide complete details of the incident, including witnesses' names
- Do not try to resolve the incident yourself or interfere with violent individuals

Supervisors/Safety Officer & Senior Management:

- ILE's Senior Management and the Safety Officer will be charged with the responsibility of conducting investigations of all reported complaints of violence within 24 hours by completing a company investigation report form
- Attempt to diffuse the situation by discussion with affected parties
- Details of the investigation will be documented, interviews may be conducted with alleged violators and witnesses
- If a safe solution is not possible, contact outside assistance such as: WSA or the local Police Force
- The complainant and the alleged harasser will be informed of the results of the investigation, while maintaining strict confidentiality.

Investigation Findings:

- All findings and details of the investigation may only be disclosed if particulars are necessary to further proceed with the investigation of the complaint, take corrective action, or are required by law.
Appropriate action will be based on the findings

Disciplinary Policy

Introduction

Interlake Electric employees must respect and comply with the Company Safety and Health Program and Provincial Regulations or be subject to Interlake Electric's disciplinary actions.

Disciplinary actions will be used as a last alternative to ensure compliance

Responsibilities:

Management

- Establish a disciplinary process by which to respond to actions where there is disregard for compliance standards established
- When required, assist the Supervisors pertaining to appropriate action to be taken when disciplinary action is to be taken
- Support Supervisors in their decision
- Ensure that disciplinary actions are applied in a consistent and effective manner relevant to the severity of the matter under consideration

Supervisors

- Consult with the Site Supervisor/Management/Senior Management when assistance in determining actions is necessary
- Respond to non-complaint activity(s) and apply the Disciplinary Policy
- Record interventions and response to action taken
- Provide recipient(s) with copies of the disciplinary action and the expected changes
- Forward disciplinary documents to the Site Supervisor/Management/Senior Management for file records

Applications:

Supervisory staff has the authority to discipline and/or suspend an employee who willfully and knowingly disobeys the rules and put themselves and/or others at risk

- **First infraction:** Verbal **Or** written reprimand, depending on the severity
- **Second infraction:** Written reprimand & possibly 5 days suspension of work, no pay
- **Third infraction:** Automatic suspension of 5 days of work, no pay
Will involve a meeting between the Site Supervisor, Management, and Senior Management, to determine whether to terminate or recommend suitable disciplinary action.

Disciplinary Action Procedures

Disciplinary actions will be used as a last alternative to ensure compliance from all employees.

FIRST INFRACTION:

Verbal Reprimand

- By Site Supervisor, Management and/or Senior Management.
- Verbal reprimand will be documented in the Employee file.

SECOND INFRACTION:

Written Reprimand

- By Site Supervisor, Management and/or Senior Management.
- Written reprimand will be documented and placed in the Employee's file.
- There may also be a suspension of up to 5 days off from work with no pay

THIRD OR MAJOR INFRACTIONS:

Third or Major Infractions

- Automatic suspension of 5 days off from work with no pay or dismissal

If the violation is of a serious nature and/or further disciplinary action is necessary there will be a meeting between the Site Supervisor, and/or Manager and Senior Management, to determine whether to **TERMINATE** or recommend suitable disciplinary action. Safety violations may result in **TERMINATION** or suspension

Safety Violations:

- Failure to rectify or notify Supervisors of a hazardous situation
- Failure to replace handrails, barrier covers, or protective devices, including safety signs,
- Failure to comply with recognized industrial practices
- Engaging in dangerous horseplay and or fighting
- Possession of or being under the influence of illegal/legal drugs, alcohol, any intoxicant, prescription drugs that have an adverse health effect or sleep deprivation on jobsites
- Smoking in unauthorized areas
- Inappropriate use of cell phones or other electronic devices
- Possession of firearms and/or other weapons
- Failure to use the appropriate PPE
- Theft, vandalism or damage to property
- Insubordination
- Failure to use sanitary facilities provided

Subcontractor/Trades Safety Policy

Introduction

Interlake Electric is committed to providing and maintaining a safe and healthy workplace for all of its subcontractors/trades.

Our objective is to provide quality, reliable service to our customers while eliminating accidental injury and risk of occupational disease to subcontractors/trades, as well as damage to property and equipment. To achieve this goal, the full cooperation of all personnel of its subcontractors/trades is necessary.

Senior Management is responsible for the health and safety of their Subcontractors/Trades.

Senior Management will:

- Identify, control, and/or eliminate known hazards, which can result in personal injury, illness, property damage or negative environmental impact.

Supervisors are responsible and accountable for the health and safety of the subcontractors/trades assigned to them.

Supervisors shall ensure that:

- Subcontractors/trades are aware, understand, and comply with the safety policies of Interlake Electric Ltd.
- Subcontractors/trades comply with all applicable legislative safety rules and regulations.
- Subcontractors/trades are properly trained to do their jobs safely.

Subcontractors/trades are ultimately responsible for their employees/own safety and shall:

- Comply with all legislative regulations.
- Comply with all company rules, policies, and procedures.
- Report all unsafe acts or conditions to their Supervisor or Foreman.

The success of our Health and Safety Program requires the dedication, commitment, and participation of all its personnel and Sub-contractors/Trades working together.

Sub-Contractor Orientation Guide

The following guide has been developed to communicate responsibilities and expectations of sub-contractors while conducting work at Interlake Electric Ltd.'s worksites. It remains the sub-contractor's responsibility to prepare for any work to be conducted by becoming knowledgeable and familiar with applicable workplace legislated requirements.

Prime Contractors responsibilities.

For the project, must take reasonable precautions to ensure everyone on the project complies with legal safety and health requirements.

Sub-Contractor responsibilities.

For knowing, following and enforcing workplace safety legislated rules and regulations.

Comply with Company safety rules, policies & procedures, even when they exceed legislated rules (scissor lifts).

Applies to sub-contractor's staff involved & visiting sites and sub-trades.

Assign a supervisor to each jobsite, Interlake Electric site supervisor must be informed of who is in charge.

Elect /appoint a Safety representative to each site, name to be provided to Interlake Electric's site supervisor.

Company General Safety rules.

Every individual supervisor, worker and visitor is responsible for safety.

Incidents, "near misses" and injuries, regardless of the nature or size shall be promptly reported to Project supervisor.

CSA approved hardhats and footwear shall be worn by all personnel and clothing appropriate to duties performed, long pants and shirts are minimum requirements, no tank tops, shorts or tennis shoes.

Safety glasses, goggles or face shields shall be worn when concrete breaking, metal chipping, welding, grinding and for other operations where eye protection is required.

Hand tools shall not be used for any purpose other than that intended; all damaged or worn parts/equipment shall be promptly repaired or replaced.

Power tools shall be operated only by authorized personnel, with manufacturers guards "in place".

All electrical hand tools shall be grounded or double insulated.

Explosive/powder actuated tools shall only be used by persons who have been instructed & trained in their safe use.

Compressed gas cylinders shall be secured in an upright position at all times.

Welding/burning operations shall be carried out only by authorized personnel with appropriate individual PPE.

Riding on equipment is strictly prohibited; no person shall ride any hook, hoist or other material handling equipment which is used strictly for handling material and not specifically to carry a rider, i.e., Bobcat Skid Steer.

Running is not permitted anywhere on the job site, except in the case of emergency.

Smoking is prohibited on any job site, unless a designated area is identified.

Possession or use on the job site of intoxicating beverages or unauthorized/illegal drugs is strictly forbidden and constitutes grounds for **immediate** dismissal.

Horseplay, fighting, gambling and possession of firearms are strictly forbidden on the job, grounds for dismissal.

Foul play or abusive language and swearing will not be tolerated and will warrant disciplinary action where necessary.

No loud music will be played that can act as a deterrent to safe work practices.

Work clothing.

Workers will wear clothing that is suitable for the task/work environment and provide protection (long pants & shirts).

Specialty clothing shall be worn when exposure to hazards exist (i.e., arc flash, fire retardant, corrosive, bio hazardous).

Safety Meetings.

A sub-contractor representative is required to attend Company safety meetings and tool box meetings.

Where a sub-contractor holds their own safety meetings, a copy of Minutes is to be forwarded to Site Supervisor.

Alcohol & Drugs in the workplace.

- No possession, sale or consumption of alcohol or drugs is permitted while at the worksite.
- Specific restrictions may apply in some projects (Aboriginal reserves, northern locations). **Smoking restrictions in the workplace.**
- No smoking where flammables materials or products are used or stored.
- Manitoba laws prohibit smoking in enclosed public areas and work spaces, only in designated smoking areas.
- Specific restrictions can apply at a project site, always check with the Supervisor.

Use of Walkmans, Discmans, MP3 players & radios.

- Strictly no use of Walkmans, Discmans, MP3 players (with headphones) while on the worksite. Vehicle radio volume levels are not to interfere with the operator's ability to know what is happening around him/her.
- Where 2-way radios are used, only work-related communication is allowed.

Machine safety & guarding.

- No equipment or tools are to be used without appropriate guards in place.
- If guards or protective devices are missing, the equipment/tool must be taken out of service and be lockout/tag out to prevent use and action for repair/replacement.
- Sub-contractors' tools & equipment are subject to inspection and corrective action if a hazard is identified.

WHMIS training and location of Contractor's Safety Data Sheets (SDS).

- All personnel who work with or around WHMIS products must be trained and proof provided upon request.
- All product containers must be labeled in accordance with legislative requirements.
- Any WHMIS controlled product on site must have a SDS available on site.
- Sub-contractor must inform the site Supervisor of the location of the SDS for their products. **Vehicle and**

equipment operation.

- Vehicles and equipment are to be operated in a safe manner at all times.
- Only qualified and licensed operators can operate equipment on a public highway or project worksite.
- Speed limits are to be observed at all times.
- Where equipment requires certification to operate, proof can be requested (i.e., forklift, cranes, boom trucks, etc.).

Personal Protective Equipment (PPE).

- CSA hardhats are to be worn as designed by the manufacturer at all work locations.
- CSA Class 1 footwear, suitable for the environment (i.e., metatarsal protection, high top to prevent ankle injury), tied up.
- Gloves are to be worn when hand protection is warranted.
- Eye protection is required whenever the potential for injury exists (i.e., drilling, grinding, chipping cement, etc.).
- Hearing protection is to be worn whenever the work environment has noise levels where you must raise your voice to speak to someone next to you. ♦ High visibility clothing is required outside, working around vehicle traffic or moving equipment and minimal lighting. ♦ Respirators of approved design must be worn where respiratory protection is warranted (i.e., dust, chemicals, etc.).

Workplace housekeeping practices.

- Sub-contractors are responsible for their own clean up; this is to be done on an ongoing basis. ♦ Storage and disposal must be arranged with the site Supervisor.

Fire prevention protection and control.

- Maintain good housekeeping on an ongoing basis.
- Store flammables in proper containers, in designated areas, away from sun, sparks, welding & other sources of ignition.
- No smoking while dispensing flammable liquids.
- Shut off ignition sources when fueling vehicles and equipment.
- Provide fire extinguishers where flammable products are to be used, train all employees on use of fire extinguishers.

Reporting "near misses" and incidents.

- Report 'all' near misses, incidents and/or equipment or property damage to the site Supervisor. Complete and provide records/documentation of incident activity, including witnesses.
- Cause(s) and corrective action that will be taken to resolve the problem must be disclosed. **Working Alone.**

Where a worker is required to perform work by him/herself, out of view of other employees, a **“Working Alone Plan”** must be prepared and implemented to ensure employee safety to provide assistance should an incident occur.

If this situation occurs at a project, the sub-contractor must develop a working alone plan and provide a copy to the project supervisor.

Lock out/Tag out.

Ensure equipment/tools that are out of service or need repair have tags attached to inform other workers not to use them

Any type of work or inspections that is done on equipment requires all sources of energy to be released, to include: air, gas, hydraulics, electrical, raised attachments, control valves, etc.

Equipment and attachments must be disabled or blocked to prevent starting and movement.

Only the person locking out can re-activate or start the equipment.

Developed lock out/tag out procedures must be followed (SWP 66 & 68)

Fall Protection & Elevated work.

Identify where fall protection will be required (JHA).

Use appropriate type of fall protection as required by Provincial legislation (2.5 meters in Manitoba, 3 meters in Ontario).

Ensure workers are trained and proof of training will be required upon request.

All equipment must be in approved condition and used in accordance with the manufacturers design.

An emergency rescue plan must be developed specific to the work being done.

Storage of materials or equipment while on site.

Sub-contractor is responsible to inform the Company of materials and equipment that will be brought on site.

Arrangements need to be made for storage (i.e., vehicles, machines, chemicals, flammables, explosives, cylinders, etc.).

Waste management (Storage & disposal).

Sub-contractor is responsible to manage and dispose of waste in accordance with federal, provincial, and local regulations and bylaws.

Emergency evacuation procedures.

Sub-contractor needs to submit the emergency procedures that his company will follow in the event of an emergency including specific details for the location, type of work, and types of emergencies that could arise.

Emergency contact numbers shall be made available to the site Supervisor.

A coordinated effort between the site Supervisor and the sub-contractor can be developed. **Emergency Spill**

Response.

Sub-contractor is required to provide procedures that his/her company would activate in the event of an emergency spill or release of a hazardous product.

Procedures need to include: 1) precautionary measures required if spill occurs (i.e., flammable products, PPE, hazards involving contact or exposure), 2) action to take to contain spill, 3) location of equipment, 4) clean up procedures.

Reporting or Sign in/Sign out procedures.

Where applicable, arrangements are to be coordinated with the site Supervisor.

Facility security.

Where applicable, site or facility security controls must be provided and procedures complied with.

Camp rules.

Where applicable, when a sub-contractor is staying at the Prime Contractor’s camp or facility, under the responsibility of the Prime Contractor all applicable rules are to be complied with (i.e., behavior, smoking, laundry, quarters, alcohol, etc.).

Sub-Contractor Requirements prior to job start-up

1. A company representative (management) must complete an Interlake Electric Safety Orientation/Agreement form (attached sheets). Documentation of this orientation must be submitted to Interlake Electric Ltd prior to commencing work on the site. If your company will be hiring any sub-contractors, they must complete a copy of this orientation agreement for as well.
2. Forms to be submitted to Interlake Electric Ltd are as follows:
 - Sub-Contractor Safety Orientation/Agreement forms completed by company representative; and
 - Sub Sub-contractor Safety Orientation/Agreement forms completed by company representative.
 - Compliance Declaration
 - The following forms are to be submitted **IMMEDIATELY** when required: Incidents, Near misses, Stop Work Order (WSH Division), Improvement Order (WSH) Division, and Harassment & Violent Incident Forms
 - Inspections and Safety meetings are to be submitted weekly (if applicable)
3. SDS for all controlled products brought to the site must be submitted to the Interlake Electric Site Supervisor or the Safety Administrator, prior to work being done on the site. This includes the Sub Sub-Contractors SDS, both are to complete and use the attached form.
4. If mobile equipment is to be brought and used on the site, the maintenance records must also be submitted to the Interlake Electric Site Supervisor or the Safety Administrator, prior to the equipment arriving on the site. This type of equipment would include: aerial lifts (scissor lifts), forklifts, zoom booms, skid steer, bucket trucks, etc.
5. Any Job Specific Safety procedures, i.e., working alone, lock out/tag out, confined space, etc., must be submitted to the Site Supervisor or the Safety Administrator, prior to the task being performed.

Sub-Contractor Safety Orientation/Agreement Form

1. **Project:** _____ Location: _____
 Sub-Contractor company name: _____
 Sub-Contractor activity: _____ Orientation Date: _____
 Start Date: _____ No. of Workers on Site: _____

2. **General Safety:**

	(mark 'X' that were discussed)			(mark 'X' that were discussed)	
Guide Ref #	Item	'X'	Guide Ref #	Item	'X'
1	Prime Contractors Responsibilities		13	Specialized Personal Protective Equipment (PPE)	
2	Sub-Contractors Responsibilities		14	Workplace housekeeping practices	
3	Safety Rules		15	Fire prevention, protection & control	
4	Work clothing		16	Reporting "Near Misses" & Incidents	
5	Safety Meetings		17	Working alone/Confined Space	
6	Alcohol & drugs in the workplace		18	Lockout/Tag out	
7	Smoking restrictions in the workplace		19	Waste Management (storage & disposal)	
8	Use of IPODS, cell phones (texting etc.) and radios		20	Emergency evacuation procedures/Site specific orientation	
9	Machine safety & guarding		21	Emergency spill response	
10	WHMIS training & location MSDS		22	Reporting or sign in/out procedures	
11	Vehicle and equipment operation		23	Facility security	
12	Personal Protective Equipment (PPE)		24	Camp/Site rules	

3. **Orientation/training resource reference used:**

- Safety Orientation Handout
- Interlake Safety Program Manual
- WSH Act & Regs
- Handouts

4. **Safety Program information:**

1. Does your Company have an up-to-date Safety & Health Program? Yes ____ No ____
2. If not, does your company have any safety systems in place? Yes ____ No ____
 Briefly describe: _____
3. Is your Company COR/SECOR Registered? Yes __ No __
4. Has your Company received COR/SECOR Certification? Yes __ No __
 Certification # _____

4. **Acknowledgement/Certification:**

I acknowledge that I have received instruction pertaining to the items identified above (Part 2), and understand the expectations to comply with Interlake Electric Ltd.'s practices, policies and procedures reviewed. In addition, I agree that as a representative of the sub-contract company, I will ensure that information is communicated to all our employees and companies sub-contracted by us. I acknowledge that the Management of Interlake Electric Ltd. is to be notified immediately of any safety concerns, problems or incidents that may arise. I understand that we must comply with and have a general knowledge of the Provincial Safety Regulations of the province we will be conducting work in and that we must also ensure all of our workers and sub-contracted workers understand and comply with this Legislation.

Sub-Contractor Representative

Interlake Electric Management Representative

Print name: _____ Print name: _____











Signature: _____ Signature: _____

Position: _____ Position: _____

Date: ____/____/____ Date: ____/____/____
 (Day) (Month) (Year) (Day) (Month) (Year)

NOTE: "Separate sheet required for each Sub-Contractor, where multiple representatives are orientated at the same time, use: **Attached form with names and signatures.**

Workplace Hazardous Material Information System (WHMIS)

	Exploding bomb (for explosion or reactivity hazards)		Flame (for fire hazards)		Flame over circle (for oxidizing hazards)
	Gas cylinder (for gases under pressure)		Corrosion (for corrosive damage to metals, as well as skin, eyes)		Skull and Crossbones (can cause death or toxicity with short exposure to small amounts)
	Health hazard (may cause or suspected of causing serious health effects)		Exclamation mark (may cause less serious health effects or damage the ozone layer*)		Environment* (may cause damage to the aquatic environment)
	Biohazardous Infectious Materials (for organisms or toxins that can cause diseases in people or animals)				

* The GHS system also defines an Environmental hazards group. This group (and its classes) was not adopted in WHMIS 2015. However, you may see the environmental classes listed on labels and Safety Data Sheets (SDSs). Including information about environmental hazards is allowed by WHMIS 2015.

- Sub-Contractor's Controlled Product List -

Company Name: _____ Project Name: _____

Completed by: _____ Date: _____

#	Product Name	Supplier	Min Qty	Max Qty	SDS
1					
2					
3					
4					
5					
6					
7					

NOTE: All controlled products brought to site must be listed above. Additional sheet if required.

Please indicate (X):

- SDS sheets submitted to Interlake Electric Ltd., ile@mymts.net
- SDS available on site with Site Supervisor
- Number of workers on site that are WHMIS trained _____.
- Asbestos or moulds present on site: asbestos _____, mould _____.

Other Comments:

-

Interlake Electric Ltd.

SUB-CONTRACTOR COMPLIANCE DECLARATION

With respect to the objects and purposes of ensuring, so far as reasonably practicable, that all construction and maintenance work undertaken by contracted parties of Interlake Electric Ltd. will be undertaken in a safe manner, the following declaration must be signed and submitted:

Submitted To: _____

Company Name: _____

Address: _____

CSAM Safety Program Information:

COR Certification # _____ or Safety Program Registration # _____

DECLARATION

As required by all employers in the province of Manitoba, I have obtained current copies of the Workplace Safety and Health Act (W210) and WSH Regulation (MR 217/2006).

As required by all employers in the province of Manitoba, I will ensure workers are supervised by a competent supervisor, familiar with the WSH Act and Regulation.

As required by all persons in the province of Manitoba, I will share required information with the prime contractor, and those affected, necessary to identify and control existing and potential hazards,

To the best of my knowledge, I and my company employees meet the minimum safety training requirements as outlined in Manitoba's Workplace Safety and Health Legislation.

My company has received a copy of Interlake Electric Ltd.'s Sub-Contractor Safety Orientation Handbook.

Print Name: _____ Signature: _____

Print Title: _____ Date: _____