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# **Health and Safety Management System**

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**Mobile Energy Systems Inc.**

**#1810, 407 – 2nd Street SW**

**Calgary, AB T2P 2Y3**

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**2021**

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**\*\* The information in this Health and Safety Manual supersedes all other COMPANY Health and Safety Manuals.**



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## Introduction & Scope

The Mobile Energy Systems Health and Safety Management System (HSMS) has been developed to provide a systematic approach to health and safety in order to have an incident free culture of safety. The HSMS applies to all operations conducted by Mobile Energy Systems. Any new acquisition, project, joint venture or contract controlled by Mobile Energy Systems shall follow its requirements.

## Terms and Definitions

**Audit** — An evaluation of an organization's Health and Safety Management System against an approved standard.

**Audit program** — A set of one or more audits planned for a specific time frame and directed towards a specific purpose. Note: An audit program includes all activities necessary for planning, organizing, and conducting the audits.

**Competent Worker** — A Person who is adequately qualified, suitably trained, and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

**Continual Improvement** — Always striving to innovate, implement and improve on current conditions.

**Contractor** — An individual or employer hired under contract to provide materials or services to another individual or employer.

**Critical Job** — A job with high potential for serious loss or injury.

**Document** — A medium containing information related to the health and safety management system.

**Hazard** — A situation, condition, or behaviour that has the potential to cause an injury or loss.

**Health Hazard:** a physical, chemical, biological or psychological hazard which may cause acute or chronic health effects in exposed workers (e.g. noise, dust, heat, ergonomics, etc.).

**Safety Hazard:** a substance, process, action or condition which may endanger the immediate safety of workers (e.g. chemical burns, shear points, slips and falls, etc.).

**Hazard Assessment** — A process used to identify and evaluate the health and safety hazards associated with job tasks and provides a method for prioritizing health and safety hazards.

**Hazard Control** — Method used to eliminate or control loss:

Engineering Controls: Preferred method of hazard control if elimination is not possible; physical controls implemented at the design, installation, or engineering stages (e.g. guards, auto shutoff, etc.).

Administrative Controls: Processes developed by the employer to control hazards not eliminated by engineering controls (e.g. safe work policies, practices and procedures, job scheduling or rotation, and training).

Personal Protective Equipment (PPE): Equipment used or clothing worn by a person for protection from health or safety hazards associated with conditions at a worksite (e.g. gloves, safety glasses, fall protection, etc.). Used when engineering or administrative methods cannot fully control the hazards.

**Imminent** — Danger in relation to any occupation.

**Incident (Accident)** — A preventable, undesired and unexpected event that results, or has the potential to result, in physical harm to a person or damage to property (loss or no loss).

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**Inspection** — A planned, systematic audit or examination of an activity or worksite, checking or testing against established standards.

**Inspector** — qualified person designated by Mobile Energy Systems to conduct inspections

**Job Inventory** — A comprehensive list of jobs/tasks produced from a systematic review of all jobs/tasks in the work area.

**Legislation** — Provincial, federal or other government standards in the form of written acts, regulations, and codes.

**Manager** — A person who administers and/or supervises the affairs of a business, office, or organization.

**Near Miss** — An undesired event that under slightly different circumstances could have resulted in personal harm, property damage or loss. Also referred to as an incident.

**Personal Protective Equipment (PPE)** — equipment used to protect body parts from harm. Includes but is not limited to hard hat, coveralls, gloves, glasses, steel toed boots, ear plugs, etc.

**Policy** — The documented principles by which Mobile Energy Systems is guided in its management of affairs.

**Procedure** — A documented method to carry out an activity.

**Record** — A document that states results achieved or provides evidence of activities performed.

**Risk** — The chance of injury, damage or loss.

**Root Cause** — The underlying or basic factors which contribute to an incident.

**Safe Work/Safe Job Procedure** — A written, step-by-step instruction of how to perform a task from beginning to end.

**System** — A set of interrelated or interacting elements.

**Unsafe Act** — Inappropriate action taken by a person that could result in loss.

**Unsafe Condition** — A condition that could result in loss.

**Visitor** — Any person present at the worksite who is not under the direct control of Mobile Energy Systems (e.g. courier).

**Work Site** — A location where a worker is, or is likely to be, engaged in any occupation and includes any vehicle or mobile equipment used by a worker in an occupation.

**Worker** — A worker supervised by a manager or supervisor/foreman.

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## 1.0 MANAGEMENT, LEADERSHIP AND ORGANIZATIONAL COMMITMENT

Senior management of Mobile Energy Systems shall provide leadership for health and safety activities and assume overall responsibility for the Health and Safety Management System (HSMS). This responsibility includes:

- Establishing, actively promoting and maintaining the HSMS.
- Providing appropriate financial, human, and organizational resources (proper staffing, equipment, training materials and funds) to plan, implement, check, review and correct the HSMS.
- Defining roles, assigning responsibilities, establishing accountability and delegating authority to implement an effective HSMS.
- Reviewing the Mobile Energy Systems HSMS at planned intervals; and
- Encouraging active participation on the part of workers and worker representatives in the establishment and maintenance of the HSMS.

### 1.1 Commitment Statement

The Mobile Energy Systems Health and Safety Management System is driven by leadership and commitment from senior management and its readiness to provide resources. Mobile Energy Systems is committed to providing a productive, safe and healthy work environment for our employees at all levels, contractors, clients, customers, visitors, and the public. Our commitments are communicated to all employees, contractors and suppliers and include:

- To instill a corporate culture where harm to our staff through work is totally unacceptable.
- To be proactive in assessing health and safety hazards for new business, new and existing work systems, practices and equipment.
- To encourage team problem solving at all levels of Mobile Energy Systems to implement work practices that continually improve health and safety standards and productivity.
- To report and investigate incidents and implement systems and practices that prevent reoccurrence.
- To ensure compliance with legal requirements and industry standards.
- To train managers and workers to competently perform work described in safe work procedures.
- To provide information to all workers, contractors and customers that inform them of health and safety issues relevant to Mobile Energy Systems operations.
- To ensure products and/or services are safe and without adverse environmental impact.
- All management personnel and workers have responsibility for implementing this health and safety management system by striving to achieve a zero tolerance towards hazards, incidents and injuries.
- We will continuously improve health and safety management by setting objectives, plans and performance measures and regularly reviewing progress against the targets set.
- We will involve our staff in health and safety management through training and by contributing to identifying, assessing and controlling hazards.

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## 1.2 Health and Safety Policy

The management of Mobile Energy Systems declares and commits to the prevention of injury and ill health of our employees and our guiding principles which include that health and safety shall never be compromised for our employees. The following points summarize our corporate overall health and safety goals:

- Mobile Energy Systems management declares a commitment to health and safety which includes physical, psychological, and social well-being.
- Mobile Energy Systems shall comply with applicable government legislation.
- Mobile Energy Systems shall comply with our own health and safety standards.
- To have a healthy and safe place to work composed of individuals who choose to make safe decisions, follow requirements and contribute to the process of health and safety.
- Our documented safety management system shall form the basis for all operations undertaken by Mobile Energy Systems
- Mobile Energy Systems will provide appropriate training in use of equipment, safe work practices and procedures and handling of hazardous materials.

### Our overall health and safety objectives are:

- Employees at all levels are responsible and accountable for Mobile Energy Systems health and safety. Active participation by everyone, every day, and in every job, is necessary for health and safety excellence and is the expectation at Mobile Energy Systems for every worksite.
- All management, supervisors, workers, contractors, and visitors shall promptly report all work related near misses, injuries, diseases, incidents, unsafe acts and conditions and actively participate in our health and safety process and attend all required health and safety training.
- Everyone shall follow safety rules, safe work policies and procedures and cooperate with Mobile Energy Systems in working towards improved safety.
- All managers and supervisors will accept direct responsibility and accountability for all matters relating to health and safety for the workers and/or contractors they supervise directly and/or indirectly.
- All supervisors and managers will deal promptly with worker and contractor health and safety concerns and will advise workers and/or contractors of actual and potential hazards that are known by the manager or supervisor.
- All supervisors, managers, and contractors will review any incident investigation and facilitate the corresponding corrective action plan.
- All supervisors, managers and contractors will implement and enforce health and safety rules, regulations, policies, procedures and prescribed instructions in a fair and consistent manner.
- Workers will be involved in writing or revising our health and safety policy. Changes will be disseminated in the same manner.
- We will ensure this policy is communicated to all workers and/or contractors under our control. This policy is to be posted on all Mobile Energy Systems bulletin boards, reception areas, included in worker handbooks and discussed during new worker orientation.

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PRESIDENT – DATE

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### 1.3 Workplace Harassment Policy Statement

The management of Mobile Energy Systems is committed to providing a work environment in which all workers are treated with respect and dignity. Harassment will not be tolerated from any person at or outside of the worksite including managers, supervisors, workers, customers, clients, other employers, and members of the public.

Mobile Energy Systems as the Mobile Energy Systems is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of harassment. Everyone is obligated to uphold this policy and to work together to prevent workplace harassment.

Workplace harassment means any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person that the person knows or ought reasonably to know will or would cause offence or humiliation to a worker, or adversely affects the worker's health and safety, and includes conduct, comment, bullying or action because of race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation, and a sexual solicitation or advance.

Reasonable action taken by Mobile Energy Systems or supervisor relating to the management and direction of workers or a worksite is not workplace harassment.

In support of this policy, we have put in place workplace harassment prevention procedures. It includes measures and procedures to protect workers from the hazard of harassment and a process for workers to report incidents or raise concerns.

Mobile Energy Systems will ensure this policy and the supporting procedures are implemented and maintained. All workers and supervisors will receive relevant information and instruction on the contents of the policy and procedures.

Supervisors will adhere to this policy and the supporting procedures. Supervisors are responsible for ensuring that measures and procedures are followed by workers and that workers have the information they need to protect themselves.

Every worker must work in compliance with this policy and the supporting procedures. All workers are required to raise any concerns about harassment and to report any incidents to the appropriate person.

Mobile Energy Systems will investigate and take appropriate corrective actions to address all incidents and complaints of workplace harassment in a fair, respectful and timely manner.

Mobile Energy Systems pledges to respect the privacy of all concerned as much as possible. Mobile Energy Systems will not disclose the circumstances related to an incident of harassment or the names of the parties involved (including the complainant, the person alleged to have committed the harassment, and any witnesses) except where necessary to investigate the incident, to take corrective action, to inform the parties involved in the incident of the results of the investigation and corrective action taken, or as required by law.

No workers can be penalized, reprimanded or in any way criticized when acting in good faith while following this policy and the supporting procedures for addressing situations involving harassment. This harassment prevention policy does not discourage a worker from exercising the worker's right under any other law, including the Alberta Human Rights Act.

**NOTE:** Refer to the Mobile Energy Systems Workplace Harassment Program.

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#### 1.4 Workplace Violence Policy Statement

The management of Mobile Energy Systems is committed to the prevention of workplace violence and is ultimately responsible for worker health and safety. We will take whatever steps are reasonable to protect our workers from the potential hazards associated with workplace violence. Violent behavior or threat of violence in the workplace is unacceptable from anyone. This policy applies to all managers, supervisors, workers, clients, customers, delivery personnel, and the general public.

Mobile Energy Systems as the employer is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of violence. Everyone is obligated to uphold this policy and to work together to prevent workplace violence.

Violence, whether at a worksite or work related, is the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm and includes domestic or sexual violence.

In support of this policy, we have put in place workplace violence prevention procedures. It includes measures and procedures to protect workers from workplace violence, a means of summoning immediate assistance and a process for workers to report incidents or raise concerns.

Mobile Energy Systems will ensure this policy and the supporting procedures are implemented and maintained. All workers and supervisors will receive relevant information and instruction on the contents of the policy and procedures.

Supervisors will adhere to this policy and the supporting procedures. Supervisors are responsible for ensuring that measures and procedures are followed by workers and that workers have the information they need to protect themselves.

Every worker must work in compliance with this policy and the supporting procedures. All workers are required to raise any concerns about workplace violence and to report any violent incidents or threats.

Mobile Energy Systems will investigate and take appropriate corrective actions to address all incidents and complaints of workplace violence in a fair and timely manner.

Mobile Energy Systems pledges to respect the privacy of all concerned as much as possible. Mobile Energy Systems will not disclose the circumstances related to an incident of violence or the names of the complainant, the individual alleged to have committed the violence, and any witnesses, except where necessary to investigate the incident or to take corrective action, to inform the parties involved in the incident of the results of the investigation and corrective action taken, to inform workers of a specific or general threat of violence or potential violence, or as required by law. Mobile Energy Systems will disclose only the minimum amount of personal information required that is necessary to inform workers of a specific or general threat of violence or potential violence.

No workers can be penalized, reprimanded or in any way criticized when acting in good faith while following this policy and the supporting procedures for addressing situations involving workplace violence. This violence prevention policy does not discourage a worker from exercising the worker's right under any other law.

**NOTE:** Refer to the Mobile Energy Systems Workplace Violence Program.

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## 1.5 Environmental Policy

Mobile Energy Systems recognizes that environmental concerns are of critical importance. Mobile Energy Systems encourages its workers to join with the company in full acceptance of and compliance with this policy. We will create procedures that fully comply with federal, provincial and local regulations. We will provide adequate training to our workers to ensure our workers are aware of these procedures and are capable of following them.

### Protection of the Environment

We will employ practical measures to protect the environment. We will conserve and protect the water, air, and land resources we use. We will strive to eliminate any releases to land, air or water that may harm human health or the environment. Continuous improvement in our environmental performance will be a principal objective.

### Waste Management Policy Statement

We will work to prevent waste and pollution at the source whenever possible. New facilities and improvements of existing operations will use processes designed to minimize the environmental effects of our operations and will incorporate functional pollution control equipment.

### Recycling and Waste Disposal

We will support recycling programs where practical and will use environmentally safe treatment and disposal practices for waste that is not eliminated at the source or recycled.

### Compliance

We will manage existing facilities so that we meet or exceed legal requirements. We will implement programs and procedures to satisfy compliance. We will conduct compliance audits and monitor procedures and practices to evaluate our performance.

### Disclosure

We will inform our workers of our progress in environmental issues. We will cooperate with the authorities and regulatory agencies in responding to inquiries. We will encourage our workers to report to the company conditions that they reasonably believe could be harmful to the environment or pose health or safety hazards so we can initiate prompt corrective actions.

### Commitment

Management will consider the environmental and cultural implications of its decisions.

This policy is to be posted in all Mobile Energy Systems facilities by the supervisor.



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## 1.6 Work Alone Policy Statement

All workers of Mobile Energy Systems will follow the Work Alone Procedure set out in this safety program. No worker will work alone without ready communication set up and regular communication schedules between him/her and some other designated person in the company or designated service provider.

Each worksite shall develop a Working Alone Plan and must provide effective radio, telephone, cellular phone or other electronic communication between a worker who works alone and persons capable of assisting the worker in an emergency or if the worker is injured or ill.

Each worksite's Working Alone Plan shall address having an established contact person. A person must be designated to establish contact with the worker at predetermined intervals and the results must be recorded by the person.

If electronic communication is not practicable or readily available at the worksite, Mobile Energy Systems must ensure that a representative of Mobile Energy Systems or another competent worker visits the worker, or the worker contacts Mobile Energy Systems or another competent worker.

These visits or contacts shall be at intervals of time appropriate to the nature of the hazards associated with the worker's work. As a minimum contact shall occur no less than every four hours.

The hazard assessment and Working Alone Plan at each Mobile Energy Systems worksite must be reviewed on an annual basis or when work processes or arrangements which could affect a worker's well-being are introduced or changed.

**NOTE:** Refer to the Mobile Energy Systems Work Alone Program.

## 1.7 Safe Journey Management (SJM) Policy Statement

Each journey exceeding 80 km outside of base operational areas shall be planned, executed, monitored, controlled and reviewed in a manner that the purpose of the journey is accomplished without any incident. A written request and report shall be completed and the manager make a monthly report to the Health and Safety Representative for SJM trips completed. This journey management plan must be performed in such a way as to:

- Minimize risks and incidents during transport or travel operations
- Reduce non-planned events inherent in transportation
- Increase the effectiveness of suitable emergency response planning

Potential journeys involving driving and/or road transport should be screened and assessed relative to hazards, risks and costs with the following type of questions:

- Is the journey really necessary or will phone calls, e-mail, or video-conferences achieve acceptable results?
- Must you drive, or is suitable public/commercial transportation available?
- Can the business requirement for a potential journey be delayed and possibly combined with a later trip?
- Can the journey be combined with other people to share a vehicle?
- Is a fit-for-purpose vehicle for the expected route and conditions available (for example, a four-wheel drive vehicle, etc.)?

**NOTE:** Refer to the Mobile Energy Systems Journey Management Program.

## 1.8 Drug and Alcohol Policy Statement

The use, abuse, reporting to work with detectable amounts in the system, bringing onto Mobile Energy Systems premises and Mobile Energy Systems worksites, possession, transfer, storage, concealment, promotion or sale of the following substances and other items as listed below by workers of Mobile Energy Systems is strictly prohibited.



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The possession of illegal drugs, unauthorized controlled substances, look-alikes, inhalants of abuse, designer and synthetic drugs, alcohol or intoxicating beverages (including the presence of any detectable amount in the worker's body while working), and any other drugs or substances which may affect a person's perception, performance, judgment, reactions or senses while working or while on Mobile Energy Systems business, including any and all drugs declared to be illegal under any Federal or Provincial law is prohibited.

The possession or the reporting to work or working with detectable amounts in the system of alcoholic or intoxicating beverages on Mobile Energy Systems premises which may affect a worker's mood, senses, responses, motor functions, or alter or affect a person's perception, performance, judgment, reactions or senses while working or while on Mobile Energy Systems premises, the bringing onto Mobile Energy Systems premises (as defined above), or the possession, transfer, storage, concealment, transportation, promotion or sale of alcoholic or intoxicating beverages is prohibited.

The possession or the reporting to work or working with drug-related paraphernalia, including any material or equipment used or designed for use in testing, packaging, storing, injecting, ingesting, inhaling or otherwise introducing into the human body an illegal, unauthorized controlled or dangerous substance as defined by this policy is prohibited.

The legal use of prescription drugs (Legally Controlled Substances) prescribed by a licensed physician are permitted, however:

- Employees will immediately inform their supervisor prior to using prescribed drugs or medication on the job.
- Medication will be in its original vial or be in a vial provided by the pharmacist commonly referred to as "day carriers" and will be in the worker's name and will have the doctor's name and the prescription number on the label, as well as the date of issuance.
- Each prescription will be not older than one (1) year of the date issued.
- Employees will only possess a reasonable amount of medication for a normal shift.
- The worker whose name appears on the label of the vial will not allow any other company worker, visitor, guest, subcontractor or any other person to consume the prescribed drug or medication.

The worker will not consume the prescribed drug or medication more often than as prescribed by the worker's physician and as set out on the label of the bottle.

**NOTE:** Refer to the Mobile Energy Systems Drug & Alcohol Program.

## 1.9 Firearms Policy Statement

No firearms or ammunition of any kind are allowed onto Mobile Energy Systems premises and worksites. The possession, storage, or concealment of any firearms or ammunition is strictly prohibited.

## 1.10 Structure and Assignment of Responsibilities

### 1.10.1 Worker Rights and Responsibilities

#### Right to Refuse

- All employees will be made aware of their right to refuse unsafe work, the company's work refusal policy, the procedures to follow when exercising their right to refuse unsafe work.
- A worker has the right to refuse unsafe work and must not carry out or cause to be carried out any work process or operate or cause to be operated any tool, appliance or equipment if the worker has reasonable cause to believe that to do so would create an undue hazard to the health and safety of any person.
- An undue hazard is one that poses a serious and immediate health and safety threat.

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- The worker must ensure that, as far as reasonably practicable, their refusal does not endanger anyone else.
- The worker must report the unsafe condition to a Supervisor or a designate without delay and allow sufficient time for the Supervisor or the designate to investigate the unsafe condition and make a decision regarding the action necessary to correct the unsafe condition.
- Work must stop and not resume until the concern has been addressed.
- The Supervisor shall perform an in-depth hazard assessment, and full investigation, without delay, and without prejudice and then advise the worker on the conclusions. Any changes to the unsafe condition must be documented and the Supervisor or designate must inform all other workers of the change.
- If the Supervisor or designate does not agree that the condition is unsafe, he/she must inform the worker. If the worker continues to refuse to carry out the work, the Supervisor or designate will then perform an investigation in the presence of the worker, a worker representative or any other available worker selected by the worker who refused the work is acceptable.
- If this investigation does not resolve the matter, then the Supervisor and the worker must notify Occupational Health and Safety without delay.
- No worker shall be subject to disciplinary action for this refusal. If temporary re-assignment is required, no disciplinary action will be initiated. No worker shall be subject to disciplinary action for this refusal. If temporary re-assignment is required, no disciplinary action will be initiated.

#### **The Right to Know**

- Every worker has a right to know what hazards are present on the job and how the hazards can affect them. The hazards will be presented to the worker(s) during health and safety training, tailgate meetings, general discussions and also in dispatched jobs.

#### **The Right to Participate**

- All workers have the right to participate in health and safety activities. Workers also have the obligation to alert management of unsafe practices and conditions.

#### **Worker Responsibilities**

- Follow all the required legislation that pertains to their jobs.
- Workers must follow all safety rules, policies, plans and procedures of Mobile Energy Systems and clients.
- Participate in the hazard identification and control process as requested by management.
- Ensure training has been completed before starting a task.
- Whenever a worker observes what appears to be an unsafe or harmful condition or act the worker must report it as soon as possible to a supervisor or to a member of Mobile Energy Systems management.
- A worker who refuses to carry out a work process or operate a tool, appliance or equipment must immediately report the circumstances of the unsafe condition to his or her supervisor or to a member of Mobile Energy Systems' management, while ensuring that their work refusal does not endanger anyone else.
- In the event of an emergency action that is required to correct a condition which constitutes an immediate threat to workers - only those qualified and properly instructed workers necessary to correct the unsafe condition may be exposed to the hazard, and every possible effort must be made to control the hazard.

### **1.10.2 Employer Rights and Responsibilities**

#### **Employer Rights**

- Expect all workers to follow all safety rules, policies, plans, procedures of Mobile Energy Systems and our clients.

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- Expect all workers to follow required legislation.
- Expect all workers and management to participate in safety program expectations.
- Expect all workers to participate in the hazard identification and reporting process.

#### **Employer Responsibilities**

- To examine the activities occurring in the workplace and identify all known hazards.
- To ensure controls are put in place and being followed for eliminating or minimizing the hazards and risks to workers.
- To ensure hazards, risks and controls are consistently communicated.
- To ensure employee knowledge of the OHS and other pertinent legislation.
- To ensure workers are qualified to perform their jobs safely.
- To ensure documentation of due diligence is complete.

#### **1.10.3 Detailed Position Responsibilities**

All levels must be aware of their individual roles and responsibilities under both legislated and company standards.

Specific health and safety responsibilities are defined and documented within the Responsibilities section of each safety procedure. The responsibilities are also clearly communicated to workers through various means such as job descriptions, meetings, site specific HSE plans, training, etc.

Management expectations and the consequences of not adopting health and safety responsibilities are clearly communicated to all workers.

Health and safety responsibilities are reviewed and revised through inspections, assessments and management reviews.

The following are required health and safety responsibilities for the indicated position.

#### **President**

Ultimate authority and responsibility for the HSMS lies with the President. The President ensures that adequate resources are available to accomplish the goals of the Mobile Energy Systems HSMS and that the system is incorporated in the day-to-day conduct of business.

#### **Senior Management**

Senior Management is responsible for ensuring development, implementation and maintenance of the safety and health management system within Mobile Energy Systems operations. This position reports to the Mobile Energy Systems President for responsibility of performance. Responsibilities include, but are not limited to:

- Provide for safe and healthy work conditions for all employees, contract employees, and the public.
- Ensure all legislated requirements are met or exceeded.
- Provide and maintain a corporate Health & Safety Policy that directs; disseminates information; and identifies training requirements and administrative process improvements.
- Provide for continuous improvement of the Health & Safety Program by way of review, audit, and participation in third party programs.
- Ensure employees and contractors know the company's expectations.
- Provide sufficient time for employees or contractors to do their jobs properly.
- Communicate important health and safety information.
- Ensure training needs are identified and met.

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- Evaluate and monitor employee performance and adherence to H&S program; and where appropriate, apply disciplinary sanctions against employees that violate Mobile Energy Systems policy; the Occupational Health & Safety/Worker's Compensation Acts or Regulations.

### Managers

- Insist on performance and behaviour that meets the standards of Mobile Energy Systems Safety Program.
- Encourage employee involvement in safety by demonstrating management's commitment.
- Ensure company, contractor and subcontractor operations are carried out within their area of responsibility and comply with government safety requirements.
- Ensure adequate supervision is provided at the worksite.
- Ensure accidents and incidents are reported and investigated and corrective actions are taken to prevent a recurrence.
- Ensure appropriate and well-maintained safety and/or other equipment, required for each job is provided.
- Ensure workers are competent and adequately trained or qualified to perform their work.
- Ensure on-going additional training needs are identified and met.
- Ensure inspections are conducted and corrective actions are taken where necessary.
- Identify training needs and ensure proper training of workers.
- Correct unsafe acts or conditions.
- Enforce health and safety standards.

### Supervisors

Maintain a safe worksite by ensuring:

- Employees know what is expected of them.
- Competencies are identified and training is provided, as necessary.
- Hazards are identified and removed where possible.
- Unsafe conditions and behaviour are corrected immediately.
- Only safe work practices are used.
- Appropriate equipment is available and well maintained.
- Regulatory requirements are met.
- Employees know and are prepared to deal with the hazards of their work and any specific hazards on the worksite.
- Personal protective equipment is available, properly used, stored, maintained and replaced when necessary.
- All accidents and incidents are reported.

### Workers or Contract Employees

It is your responsibility to protect yourself, fellow workers, the public and the environment by:

- Becoming thoroughly familiar with the Safety Program and by actively participating in the program's development and maintenance.
- Working in compliance with the Provincial Occupational Health & Safety/Worker's Compensation Acts or Regulations and Mobile Energy Systems safety requirements.

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- Knowing your rights, including the right to refuse to perform work when unsafe conditions exist (as defined in the Occupational Health and Safety legislation) or when you are not competent to perform the task.
- Reporting to your supervisor any potential hazards.
- Immediately reporting all accidents, incidents, near misses, injuries or illnesses.
- Using all required personal protective and safety equipment.
- Participating in all training offered by Mobile Energy Systems, either on or off the worksite.
- Checking tools and equipment, including personal protective and safety equipment, for hazards before using them.
- Knowing the location, type and operation of all emergency equipment related to your specific job.
- Understanding that working safely is a condition of employment and that Mobile Energy Systems expects you to use common sense at all times.

#### **Contractors, Subcontractors and Consultants Responsibilities**

- To insist on safe performance throughout their operations by ensuring their employees are competent to do their work properly.
- Ensure their employees comply with Mobile Energy Systems safety rules and expectations.
- Ensure programs and operations, in which they are involved, comply with contractual and regulatory requirements.
- Ensure sufficient time and resources are provided to enable employees to do their work properly.

#### **Visitors Responsibilities**

- All visitors, with the exception of delivery personnel, must review the Mobile Energy Systems visitor orientation and sign in and out on the Visitor Log.
- Visitors entering Mobile Energy Systems work locations must follow the instructions of the Site Supervisor or company escort.
- Personal protective equipment must be worn as and when required.
- All visitors shall not be exposed to any hazard for which they do not have required training for.

### **1.11 Employee Participation**

Employee participation is an essential aspect of the HSMS. Mobile Energy Systems shall provide employees and employee representatives, if warranted due to company workforce size, with time and resources to participate effectively in the development of the safety and health policy and in the process of HSMS planning, implementation, training, evaluation, and corrective action; and encourage employee participation by providing mechanisms that:

- Support employee participation, such as identifying and removing barriers to participation.
- Establish workplace health and safety committees or employee representatives where required by OHS legislation and, where applicable, collective agreements or other requirements; and
- Ensure that employees and employee representatives are trained in, and consulted on, all aspects of HSMS associated with their work.

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## 1.12 Communication

Communication is introduced to the site through health and safety meetings, training sessions, pre-job hazard assessments, etc. All suggestions from workers are recorded and recognition of the worker's involvement and co-operation will be given. Mobile Energy Systems wants to encourage participation in good health and safety practices and support for our policy and objectives by consulting and communicating with all workers.

Methods used to involve workers in hazard identification, risk assessment and risk control and to encourage worker involvement in the health and safety process include:

### 1.12.1 Open Door Policy

It is preferred that the immediate supervisor and/or project management be consulted for resolution of the concern; however, Mobile Energy Systems maintains a strong open-door policy to report problems or concerns to any level of management without fear of reprisal of any worker.

### 1.12.2 Behavioural Based Safety Observation

Employees may report any suggestions, unsafe act, unsafe condition or recognition, even anonymously, via the Mobile Energy Systems Behavioural Based Observation Form. The form is to be immediately forwarded to the Health and Safety Representative.

Employees may use other observation forms if another safety observation program is present. Observations by fellow workers are to be performed in a positive, non-judgmental manner and the observed worker must give permission prior to the observation.

No disciplinary action may result from safety observations by fellow workers. Supervisors will always allow time for safety observations to be made based on operational scheduling. Supervisors do not conduct observations.

Refer to the Mobile Energy Systems BBS Program. If a client has a BBS program for a work location Mobile Energy Systems will participate in that program.

*(Form – Behaviour Based Safety Observation)*

### 1.12.3 Safety Meetings

#### Quarterly Safety Meetings

Employees are required to attend regular safety meetings. Meetings will include safety concerns, stats, incidents, regulation updates, safety presentations, etc. Meetings will be documented.

*(Forms – Safety Meeting Agenda & Safety Meeting Minutes)*

### 1.12.4 Senior Operating Officer Communication

No less than once a year the senior operating officer shall communicate to all workers about the commitment to health safety by Mobile Energy Systems. This communication will be in writing and can be accomplished by bulletin board posting, paycheck inserts, etc. A copy of the annual communication is to be provided to the Health and Safety Representative for compliance documentation.

### 1.12.5 Work Site Tours

Senior managers, managers and supervisors shall tour the worksite they manage no less than quarterly to reinforce health and safety practices and behaviours. A worksite tour is a visit to any site where work is conducted to observe employee compliance with health and safety standards and practices, and to conduct two-way communication with employees. Tours should act as an outlet for positive reinforcement of behaviour changing opportunities. A worksite

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tour is generally human-oriented and is not a substitute for safety audits and routine inspections, which are more technical in nature. The tours can be concurrent with other business purposes.

Documentation is required to confirm the worksite was observed and safety issues discussed; it is suggested that completed tour dates and findings be provided to the Health and Safety Representative for compliance documentation. Examples of acceptable documentation are:

- Management Work Site Visit Form
- Documented Observations from the visiting manager
- Pre-Job Safety Meeting and Inspection Form

### 1.13 Legal and Other Requirements

#### Objectives

- To describe the process developed to identify and have access to legal and other requirements
- To keep the information up to date and to communicate these requirements to those with compliance responsibilities.

#### Responsibilities

##### *Health and Safety Representative*

- Identify and ensure access to legal and other requirements.
- Identifies, tracks and monitors legal and other requirements for work performed.
- Provides updates and ensure accuracy and completeness of the Mobile Energy Systems Safety & Health Compliance Matrix and communicates requirement changes to the manager and supervisors.

##### *Managers and Supervisors*

- Notifies the Health and Safety Representative of new projects and communicates responsibilities to our employees.
- Communicates facility and operational changes to the Health and Safety Representative.

##### *Employees*

- Follows all legal and other requirements.

#### Procedure

Mobile Energy Systems operations personnel notify the Health and Safety Representative if a new project is to begin.

The Health and Safety Representative then conducts an analysis which identifies the legal and other requirements that apply to the scope of work being performed.

Copies of current occupational health and safety legislation (federal, provincial, and municipal) appropriate to the operation of the worksite(s) will be present on site. Employees are to have access. Examples include:

- Regulatory statutes applicable to the jurisdiction of the worksite
- Hazard or industry specific statutes and regulations
- Municipal laws/regulations/by-laws
- Collective Agreements if applicable
- Client requirements

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#### 1.13.1 Legal Requirements

- Regulatory statutes applicable to the jurisdiction
- Hazard or industry specific statutes and regulations
- Municipal laws/regulations/by-laws
- Collective Agreements (e.g. those containing provisions for personal protective equipment)

#### 1.13.2 Other Requirements

- Client requirements
- Industry and trade association codes
- Standards that must be adhered to in the organization – e.g. ACGIH Threshold Limit Values

Identified legal and other requirements are listed on the Mobile Energy Systems Health & Safety Legislation Compliance Matrix.

Legal and other requirements are incorporated into the Worksite Hazard Assessment which is included in the site specific HSE plan for the project.

#### 1.13.3 Means of Tracking Requirements

Establish means of tracking all of the above (through internet, e-mail, safety bulletin boards etc.)

Mobile Energy Systems subscribes to those identified information services as required to be continually informed of regulatory scope changes.

Mobile Energy Systems uses the internet to check on safety and health new or revised legislation for the scope of work being conducted.

#### 1.13.4 Review of Requirements

Legal and other requirements are reviewed annually.

### 1.14 Resource Availability

Senior management of Mobile Energy Systems shall provide appropriate financial, human, and organizational resources (proper staffing, equipment, training materials and funds) to plan, implement, check, review and correct the HSMS.



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#### 1.14.1 Health and Safety Legislation Compliance Matrix

ASPECT	LOCATION	CITATION OR STANDARD	COMPLIANCE OBLIGATION OR TASK	FREQUENCY	RESPONSIBLE PARTY	OPERATIONAL CONTROL	RECORDS
Canada Labour Code	All Canadian Operations	SOR/94-263, s. 1; SOR/2002-208, s. 1	Provides occupational facility requirements within Canada	Continuous	Entire Organization	Inspections	Mobile Energy Systems Safety & Health Management System
Hazardous Products Act	All Canadian Operations	Entire	WHMIS-controlled products in the workplace or who supply these products.	Continuous	Entire Organization	Inspections	WHMIS Training Records
Occupational Health and Safety (OHS) Regulation	All Operations	Act, Regulation & Code	The OHS Regulation contains legal requirements that must be met by all workplaces under the inspectional jurisdiction of the WCB.	Continuous	All Operations	Inspections	Mobile Energy Systems Safety & Health Management System
Workers Compensation Compliance	All Operations	Per Provincial/State Regulations	Follow Federal law, provincial law, or state law for worker compensation requirements	Continuous	Health and Safety Representative	Workers Compensation Procedure	Workers Compensation Records
Client HSE Compliance	Client Specific	As specified by client	Follow individual client safety and environmental requirements	Continuous	All Employees	SSHP Inspections	SSHP Inspections
Vehicle Operation Compliance	All Operations	Provincial/state and local community driving laws and regulations	Follow all provincial/state and local vehicle operating laws and regulations	Continuous	Manager	Training License Verification	Human Resources

All Legislation may be found at: <https://safety2go.ca/legislation/>

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## 2.0 HAZARD IDENTIFICATION AND ASSESSMENT

Safety legislation specifies that an employer shall ensure that a known safety hazard which, (a) cannot be readily controlled or eliminated and, (b) has the potential for causing serious injury is identified and brought to the attention of workers who may be exposed to the hazard. Hazard assessments will provide information on the hazards which may exist in the workplace, how the hazards are created, and the potential for loss associated with various hazards and, ultimately, the controls of the hazards. The material in this document does not take precedence over applicable government legislation which all employees must follow.

Any changes to this program must be approved by the Health and Safety Representative.

### Purpose

The purpose of this program is to provide guidelines for identifying, assessing and controlling workplace hazards, to ensure the potential hazards of new processes and materials are identified before they are introduced into the workplace and to identify the jobs/tasks which require risk assessment.

### Scope

When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Mobile Energy Systems employees and shall be used on owned premises, or when an operator's program does not exist or is less stringent.

### Objectives

- To identify, assess and document health and safety risks in the workplace for routine and non-routine activities while ensuring workers are involved during the processes.
- To eliminate, as far as is practicable, the risk of human injury, illness or damage to property.
- To promote planning as a means of achieving continuous improvement in our health and safety performance by utilizing risk management procedures when establishing our annual health and safety objectives.

### Assignment of Responsibilities

#### *Health and Safety Representative*

- Introduces hazard identification and assessment procedures and assists managers with implementation.
- Determines risk levels for identified hazards and continually reviews legal and other requirements.
- Utilizes risk management procedure results when establishing Mobile Energy Systems annual health and safety objectives.
- Maintains all documentation related to hazard identification and assessment; and
- Provides training for key workers in the process of hazard identification and assessment.

#### *Managers & Supervisors*

- Implements hazard identification and assessment procedures and ensure workers are involved.
- Supplies the Health and Safety Representative copies of all documents generated related to hazard identification and assessment.

#### *Employees*

- Provide input to risk identification and assessment procedures.

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## 2.1 Hazard Identification

Mobile Energy Systems must assess a worksite and identify existing or potential hazards before work begins at the worksite or prior to the construction of a new worksite.

The hazard identification process should be used for routine and non-routine activities as well as new processes, changes in operation, products or services as applicable.

All hazard assessments are documented. Mobile Energy Systems must prepare a report of the results of a hazard assessment and the methods used to control or eliminate the hazards identified.

Inputs into the baseline hazard identification include, but are not limited to:

- Scope of work
- Legal and other requirements.
- Previous incidents and non-conformances.
- Sources of energy, contaminants and other environmental conditions that can cause injury.
- Walk through of work environment.

Hazard identifications (as examples) are to include:

- Working Alone
- Thermal Exposure
- Isolation of Energy
- Hearing Protection
- Confined Spaces
- Driving
- General Safety Precautions
- And any other established policy or procedure by Mobile Energy Systems
- Any other specific work scope

Policies are in place to identify potential hazards by the use of JSA, JHA, FLHA, work permits, inspections by department, site or company audits, toolbox meetings, incident notices, safety observations and incident investigations.

All identified hazards are then assessed for risk and risk controls are assigned within the worksite hazard assessment for that specific hazard.

At existing locations employees and/or subcontractors are actively involved in the identification of hazards. All employees and subcontractors affected by hazards identified in the hazard assessment process are informed of the hazards and the methods used to control or eliminate the hazard. Worker names and participation in the process shall be documented either on the written hazard assessment reports or in toolbox meeting forms. Workers will be trained in the hazard identification process including the use and care of proper PPE, how to complete FLRA, JHAs, etc.

Workers participate in the hazard assessment process. Mobile Energy Systems must involve affected workers in the hazard assessment and in the control or elimination of the hazards identified.

Unsafe hazards must be reported immediately and addressed by the supervisor. The supervisor discusses the worksite hazard assessment with employees at the respective work location during the employee's documented orientation.

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Occupational hazards are divided into two categories:

**Health Hazards:** A health hazard may produce serious and immediate (acute) health effects or cause long-term (chronic) health problems. All or part of the body may be affected. Someone with an occupational illness may not recognize the symptoms immediately. For example, noise-induced hearing loss is often not noticed until it is well advanced.

**Safety Hazards:** A safety hazard is anything that could endanger the immediate safety of a worker, for example, a pinch point, crush, or burn hazard.

### 2.1.1 Hazard Categories

Both health and safety hazards can be classified into the following categories:

**Physical:** slipping, falling, lifting heavy loads, being struck by objects, violence and pinch points.

**Chemical:** liquids, sprays solvents, fumes, gases, vapours - acute or chronic toxins which are ingested, inhaled, absorbed or injected

**Biological:** specific bacteria or viruses, moulds, fungi, body fluids, and sewage

**Radiation:** exposure to radioactive substances which are non-ionizing (e.g. – microwaves, lasers, radio frequency, ultraviolet, infra-red, visible light) or ionizing (e.g.- x-rays, radio-active substances)

**Environmental:** heat, cold, noise, air quality, vibration

**Ergonomic:** strains, physical stress, eye strain,

**Psychological:** bullying, harassment, stress and fatigue

**Mechanical:** trapped between moving parts, pinch points, struck by, struck against and contact with moving parts.

### 2.1.2 Sources of Hazards

The three most likely sources that should be considered are:

**People:** Lack of training, poor communication, rushing, fatigue and other factors may cause at-risk behaviours.

**Equipment and Materials:** Some equipment, tools and materials used in the job process are inherently hazardous, and others become hazardous over time due to inadequate maintenance, storage, or disposal.

**Workplace Environment:** Factors such as facility layout, ventilation and lighting, walking surfaces, temperature and other variables can all be sources of hazards.

## 2.2 Types of Hazard Assessments

A formal hazard assessment takes a close look at the overall operations of an organization to identify hazards, measure risk (to help prioritize hazards), and develop, implement and monitor related controls. Worker jobs or types of work are broken down into separate tasks. Formal hazard assessments are detailed, can involve many people, and will require time to complete. The end goal is to prevent work-related injuries and illnesses.

Field-level hazard assessment or site-specific hazard assessment is performed before work starts at a site and at a site where conditions change or when non-routine work is added. This flags hazards identified at the location (e.g. overhead powerlines, poor lighting, wet surfaces, extreme temperatures, the presence of wildlife), or is introduced by a change at the worksite (e.g. scaffolding, unfamiliar chemicals, introduction of new equipment). Any hazards identified are to be eliminated or controlled right away, before work begins or continues. The nature of an organizations operations will dictate what type of site-specific hazard identification system will be appropriate for their operations.

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Employers with static, predictable operations in fixed locations may have a minimal site-specific hazard identification system.

## **2.3 Hazard Assessment Procedure**

### **2.3.1 Formal Hazard Assessment**

Formal hazard assessments will serve as the foundation of the Mobile Energy Systems HSMS and involve the identification of all jobs and tasks performed by workers, the assessment of each task for hazards and the prioritization of the hazards based on the level of risk. This process will be followed by the implementation of controls for the identified hazards. Key workers charged with conducting hazard assessments shall receive training in how best to complete the process.

### **2.3.2 Steps for Conducting a Formal Hazard Assessment**

#### **2.3.2.1 Create an Inventory of Positions**

The first step of formal hazard assessment is to create a list of all positions within the scope of Mobile Energy Systems and record the number of workers that perform each job. Additional areas for jobs and tasks identification include:

- Activities of all persons having access to the workplace including contractors and visitors.
- Ergonomic assessments
- Industrial hygiene surveys
- Workplace inspections
- Purchasing and procuring
- Document review
- Accident/incident investigations
- It is also necessary to consider future tasks or situations that involve a change to the existing premises or process, or those which are non-routine.

Once this is done, list all the tasks performed as part of each position identified.

#### **2.3.2.2 Identify and Assess Hazards**

Each inventoried position is assessed to determine the potential hazards and associated risk for every task. For each task listed, Mobile Energy Systems will identify any health or safety hazards to which workers may be exposed. Mobile Energy Systems will involve workers who perform the tasks in this process to ensure nothing is overlooked. Questions to ask during the Hazard Identification process should include:

- Could any part of the body get caught in or between objects?
- Do tools, machines, or equipment present any hazards?
- Can the employees be harmed if there is contact with the machine?
- Can the employees slip, trip, or fall?
- Can the employees suffer strain from lifting, pushing, or pulling?
- Are the employees exposed to extreme heat or cold?
- Is there a danger of items falling?
- Is lighting a problem?
- Can weather conditions affect safety?
- Are there fumes, vapours, dusts, or mists in the air?

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After the hazards are identified, risk ratings are calculated by answering the following three questions:

- What are the consequences if the hazards are not controlled?
- What is the probability of an incident occurring?
- What is the frequency of exposure to the hazard?

#### **2.3.2.3 Prioritize Hazards**

Using the information from the assessment Mobile Energy Systems determines the risk rating for each hazard, and ranks the hazards in order of priority, based on the level of risk.

Which hazards do you see as your top priority?

##### **1. Accident Frequency and Severity**

Jobs where accidents occur frequently, or where accidents occur infrequently but can result in serious injury.

##### **2. Potential for Severe Injury**

Jobs where the consequences of an accident can be severe.

##### **3. Newly Established Jobs**

Due to lack of experience in these jobs, hazards may not be readily apparent.

##### **4. Modified Jobs**

New hazards may come with changes in job procedures.

##### **5. Infrequently Performed Jobs**

Employees may be at greater risk when doing non-routine jobs.

#### **2.3.2.4 Determine Controls**

Mobile Energy Systems addresses identified hazards by assigning methods of control to eliminate or reduce the hazard. The most effective controls can be determined based on legal requirements, manufacturers' specifications, Mobile Energy Systems rules, industry best practices and worker input. Mobile Energy Systems records the control methods, the date of implementation, and the names of those who participated in the assessment and control process. Mobile Energy Systems will follow up with periodic reviews to ensure the control measures are working and effective. See Section 3 (Hazard Control).

#### **2.3.2.5 Review Hazard Assessments**

All hazard assessments are kept current. Formal hazard assessments are dated and subject to review schedule to prevent the development of conditions that may put workers at risk. These reviews will take place annually (at a minimum) or any time a new process is introduced, a change is made to the operation, introduction of new equipment, materials or products, a significant addition or alteration is made to a worksite or a piece of equipment, or in response to previously unrecognized hazards identified through a field-level hazard assessment, inspection or incident investigation.

Hazard assessments are reviewed with affected workers. Mobile Energy Systems must ensure that workers affected by the hazards identified in a hazard assessment report are informed of the hazards and of the methods used to control or eliminate the hazards.

The respective supervisor or project manager advises the health and safety representative when additional hazards are introduced into the workplace in order to revise planning and assessment needs.

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### 2.3.3 Site-Specific Hazard Assessment

A field-level hazard assessment or site-specific hazard assessment is to be performed at the job site when hazards not considered in the formal hazard assessment could be introduced. This includes owned, non-owned, temporary, and mobile worksites. All workers at the job site must participate in a field-level assessment with their supervisor. The field-level hazard assessment is to be conducted before work begins and repeated at reasonable intervals if new conditions, tasks, equipment, construction and/or a new work process is introduced. The field-level hazard assessment must also be completed at temporary or mobile worksites and worksites not owned by the company. The steps involved are as follows:

- Before starting work on a new job site, or under unfamiliar conditions, worker(s) must stop to identify any hazards that may have been introduced into their usual work.
- Any existing hazards are identified and assessed on the spot and controls are put in place immediately to eliminate or reduce the risk to a reasonable level before work begins.

In many cases, a field-level hazard assessment will identify hazards that have already been identified and assessed through the formal hazard assessment process, since the formal process should have identified all hazards that workers would normally encounter in the course of their work. If this happens, the worker would be directed to a pre-determined method of hazard control. If a new and unusual hazard specific to the job or job site is identified a new control method may have to be identified and implemented before work can begin.

When a new control method is required for a new or unusual hazard, that hazard must be reported to the supervisor. Mobile Energy Systems can then prioritize the hazard and determine if further preventative action needs to be conducted by the company (such as revision of training, procedures, and awareness bulletins).

Field-level hazard assessment forms will be maintained at the worksite and a copy submitted to the Health and Safety Representative for documentation purposes.

*(Forms – Field Level Hazard Assessment / Site-Specific Hazard Assessment / Pre-Job Inspection and Safety Meeting)*

### 2.4 Risk Assessment Matrix

Each identified hazard is assessed for risk based on potential consequences of effecting injury to people, damage to assets, the environment or reputation of Mobile Energy Systems. The frequency of risk exposure is then considered.

Following risk assessment steps each risk assessed becomes classified as low, medium or high in accordance with the Mobile Energy Systems Risk Assessment Matrix shown below. The risk level of the hazard is recorded with the associated work task within the site specific HSE plan for the job site.

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## MOBILE ENERGY SYSTEMS RISK ASSESSMENT MATRIX

### LEGEND

<b>L = Likelihood:</b> The probability of a loss when the hazardous event occurs		
<b>E = Exposure:</b> How frequently does the hazardous event occur?		
<b>C = Consequence:</b> The outcome or result of the hazardous event, if the loss occurs		
Likelihood	Exposure	Consequence
1. Very Low	1. Annually	1. First Aid Injury, negligible damage to equipment/property
2. Low	2. Monthly	2. Medical Aid Injury, minor damage to equipment/property
3. Medium	3. Weekly	3. Lost Time Injury, moderate damage to equipment/property
4. High	4. Daily	4. Permanent Disability-Serious Health Effects, major damage to equipment/property
5. Very High	5. Continuous	5. Fatality-Chronic Health Effects, extreme equipment/property damage

### Priority Rank Values

<b>1-35:</b> Minimum Risk-Proceed after considering all elements of risk. Covered by individual's competency and skill
<b>36-64:</b> Moderate Risk-Continue after taking action to manage overall level of risk. Supervisory level approval required prior to worksite activity
<b>&gt;65:</b> High Risk-STOP! Do not proceed until sufficient control measures have been implemented to reduce risk to an acceptable level. Supervisor or Management approval required prior to worksite activity.

## 2.5 Risk Controls

Risk assessed hazards are compiled with and addressed and mitigated through dedicated assignment, appropriate documentation of completion, and implemented controls methods including engineering or administrative controls and PPE required into the worksite hazard assessment of the site specific HSE plan. No work will begin before the worksite assessment is completed. Additionally, no risk assessed as High (Intolerable) shall be performed.

All controls for hazards include engineering, administrative, and PPE. If an existing or potential hazard to workers is identified during a hazard assessment, Mobile Energy Systems must take measures to eliminate the hazard, or if elimination is not reasonably practicable, control the hazard. If reasonably practicable, Mobile Energy Systems must control a hazard through the use of engineering controls. If a hazard cannot be adequately controlled using engineering controls, Mobile Energy Systems must use administrative controls that control the hazard to a level as low as reasonably achievable. If the hazard cannot be adequately controlled using engineering and/or administrative controls, Mobile Energy Systems must ensure that the appropriate personal protective equipment (PPE) is used by workers affected by the hazard. Mobile Energy Systems may use a combination of engineering controls, administrative controls, and personal protective equipment if there is a greater level of worker safety because a combination is used.



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## 2.6 Emergency Control of Hazards

Only those employees competent in correcting emergency controls of hazards may be exposed to the hazard and only the minimum number of competent employees may be exposed during hazard emergency control. An example is a gas leak in a building. Only those personnel with training on fire safety, gas supply shut off and other related controls will attempt to resolve the emergency control of a hazard. Mobile Energy Systems will make every possible effort to control the hazard while the condition is being corrected or under the supervision of client emergency response personnel in every emergency.

## 2.7 Reporting Hazards

Hazard reporting is an immediate process that allows employees to report hazardous conditions or practices as they notice them. This allows for prompt reporting and corrective action without waiting for the next round of inspections, a field level hazard assessment to be completed or for a near miss to occur.

- Employees shall not perform any work they feel is unsafe. Each worker is required to immediately report any unsafe condition or act to their immediate supervisor. Any worker may report hazardous work conditions without fear of reprisal.
- All workers have a responsibility for reporting hazardous work conditions, practices, or acts that are encountered on the job site.
- Employees shall immediately report before reporting for work, and any non-work injuries or prescriptions that could affect their ability to safely perform their normal job.

## 2.8 Review Process

The hazard assessment program will be reviewed annually at minimum to ensure no new hazards derived from the corrective measures. Additionally, a review shall occur following any changes to policies or procedures, in response to inspection or incident investigation, or if a site specific hazard assessment identifies and update or review is required.

The review shall include a management of change consideration. The safety committee shall be involved in the review process as well.

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### 3.0 HAZARD CONTROL

#### Objectives

- To provide guidelines to control identified and assessed risks.
- To emphasize the importance of understanding the hierarchy of controls for the effective elimination of identified risks within our workplaces.

#### Assignment of Responsibilities

Health and Safety Representative, managers, supervisors and workers as identified specific reference procedures and safety programs.

#### 3.1 Hierarchy of Controls

**Elimination** is the most effective way of controlling a hazard, as this method physically removes the hazard from the workplace.

**Substitution** is the second most effective manner of hazard control, as it replaces the hazardous work practice or machine with an alternative practice or machine.

**Engineering Controls** are the third most effective form of hazard control, after elimination and substitution. Examples include:

- Building a catwalk with handrails and replacing a portable ladder with a permanent access ladder for maintenance procedures.
- Building a sound-dampening enclosure around a piece of loud equipment to reduce workers' noise exposure.
- Replacing a harmful chemical with a less hazardous product

**Administrative Controls** are the fourth most effective method of hazard control and involve the implementation of Mobile Energy Systems practices, procedures and rules to reduce the amount of exposure a worker has to the danger. Examples include:

- Developing and enforcing the use of practices and procedures for conducting a task safely.
- Providing emergency response training to all workers and conducting regular drills.
- Job rotation; and
- Posting signs to warn of high noise areas.

**Personal Protective Equipment (PPE)** is the method of last resort and should always be used in combination with other control methods. Personal protective equipment is often the easiest control to implement but is usually the least effective. Examples of Personal Protective Equipment include:

- Safety glasses to protect the eyes from flying debris.
- Hard hats to protect the head from falling objects; or
- Respiratory protective equipment to protect the lungs from harmful dusts and chemical vapours

#### 3.2 Developing Controls

Risk assessed hazards are compiled with risk control methods including engineering, administrative controls and/or PPE required into the Critical Task Worksheet for each work location. No work will begin before the work location hazard and risk assessment is completed for new locations or where changes have been made to existing work locations where new processes could cause risk.

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### 3.2.1 Develop Hazard Controls

Using the results of the hazard assessment Mobile Energy Systems will determine possible controls for the identified hazards. Mobile Energy Systems desires to solicit input from the workers. Their knowledge of the job tasks can be of great value to the process, and their involvement will help gain worker buy-in. Other sources of information about possible controls will include codes and standards, health and safety legislation, and existing company policies.

### 3.3 Implementation of Controls

Implementation involves the installation of engineering controls, the development of policies, procedures, codes of practice, rules and preventative maintenance schedules and the introduction of PPE. Implementation will also involve training workers and contractors in the use of controls and the introduction of policies to enforce their use.

Only those workers competent in correcting emergency controls of hazards may be exposed to the hazard and only the minimum number of competent workers may be exposed during hazard emergency control. An example is a gas leak in a building. Only those competent personnel with training on fire safety, gas supply shut off and other related controls will attempt to resolve the emergency control of a hazard. Mobile Energy Systems will make every possible effort to control the hazard or under the supervision of client emergency response personnel in every emergency.

### 3.4 Review and Revision of Controls

Hazard assessments and controls are reviewed promptly after controls are implemented to monitor for effectiveness. Subsequent and regular reviews should also take place at least annually to verify that original expectations were correct, and that established controls continue to be adequate. Mobile Energy Systems will also re-evaluate hazard assessments and controls whenever there are changes to the operation or to the work being done. Mobile Energy Systems will communicate any changes in the use of hazard controls to affected employees.

### 3.5 Enforcement of Controls

Mobile Energy Systems is responsible for ensuring workers are informed of job-related hazards, trained in the methods used to control these hazards and made accountable to use the controls in place.

### 3.6 Workplace Harassment

#### 3.6.1 Key Responsibilities

##### Safety Manager

Mobile Energy Systems has a written Workplace Harassment program. Mobile Energy Systems has developed a policy and procedures respecting potential workplace harassment in Alberta.

##### Manager

- Responsible for the implementation and maintenance of the plan for the workplace and ensuring all assets are made available for compliance with the plan.
- Enforcing by immediate, and with no hesitation, steps to immediately address any incident of workplace harassment.

##### Employees

- All shall be familiar with this procedure and the local workplace harassment plan.
- Shall immediately report any exposure to or knowledge of workplace harassment to their supervisor.

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### 3.6.2 Definition

“Harassment” is defined as any single incident or repeated incidents of objectional or unwelcome conduct, comment, bullying or action by a person that the person knows or ought reasonably to know will or would cause offence or humiliation to a worker, or adversely affects the workers health and safety and includes:

- Unwelcome conduct, comments, gestures, or contact which causes offense or humiliation (e.g. name calling, harassing phone calls, spreading rumors)
- Deliberate mis gendering (i.e. referring to a person using terms or pronouns that do not align with the persons affirmed gender)
- Physical or psychological bullying which crates fear or mistrust or which ridicules or devalues the individual (e.g. fist shaking, yelling)
- Exclusion or isolation of individuals
- Intimidation (i.e. standing too close or making inappropriate gestures or comments)
- Cyber bullying (e.g. posting or sending offensive or intimidating messages through social media or email)
- Deliberately setting up the individual to fail (E.g. making unreasonable demands, setting impossible deadlines, interfering with work)
- Intentionally withholding information or giving the wrong information
- Taking away work or responsibility without cause
- Displaying or circulating offensive pictures of materials in print or electronic form.

Harassment excludes any reasonable conduct of an employer or supervisor related to the normal management of workers on a worksite. Reasonable actions considered to be part of a managers or supervisors work functions include changing work assignments, scheduling, assessing and evaluating work performance, inspecting workplaces, implementing health and safety measures, and taking disciplinary action such as dismissing, suspending, demoting or reprimanding with just cause. Done reasonably and fairly, these actions should not be considered workplace harassment.

Differences of opinion or minor disagreements between co-workers are also not generally considered to be workplace harassment but can turn into harassment if no steps are taken to resolve the conflict. Similarly, difficult conditions of employment such as professional practice limitations, organizational changes, or financial restrictions are not considered harassment. Work-related stress, on its own, does not constitute harassment. However, an accumulation of stress factors resulted from harassing behaviours such as those described earlier may result in a harassment situation.

### 3.6.3 Mobile Energy Systems’ Responsibility to Inform Employees

Mobile Energy Systems must inform workers who may be exposed to the risk of harassment of the nature and extent of the risk. The duty to inform workers includes a duty to provide information when a risk of harassment is identified related to the risk of harassment from other known persons who have a known history of harassing behaviour and/or whom workers are likely to encounter in the course of their work.

Mobile Energy Systems will ensure that workers are instructed in how to recognize workplace harassment, the policy, procedures and workplace arrangements that effectively minimize or eliminate workplace harassment, the appropriate response to workplace harassment, including how to obtain assistance and procedures for reporting, investigating and documenting incidents of workplace harassment.

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#### 3.6.4 Risk Assessment

A risk assessment must be conducted to evaluate the risk of workplace harassment. Mobile Energy Systems must identify and assess the risk of harassment in the workplace in consultation with the committee at the workplace, the representative at the workplace or when there is no committee or representative, the workers at the workplace.

#### 3.6.5 Compliance

All workers are responsible and will be held accountable for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe and secure work environment.

A person must not engage in any improper activity or behaviour at a workplace that might create or constitute a hazard to themselves or to any other person. Improper activity or behaviour must be reported and investigated.

Managers, supervisors and workers will comply with work practices that are designed to make the workplace more secure and will not engage in threats or physical actions which create a security hazard for others in the workplace. Managers and supervisors will:

- Inform workers, supervisors and managers about our Workplace Harassment Prevention Program.
- Evaluate the performance of all workers in complying with our establishment's workplace security measures.
- Recognize workers who perform work practices which promote security in the workplace.
- Provide training and/or counselling to workers who need to improve work practices designed to ensure workplace security.
- Discipline workers for failure to comply with workplace security practices.
- Follow established workplace security directives, policies and procedures.

Managers and supervisors will maintain an open, two-way communications system on all workplace safety, health and security issues. Our establishment has a communication system designed to encourage a continuous flow of safety, health and security information between management and our workers without fear of reprisal and in a form that is readily understandable. Our communication system consists of the following items:

- New worker orientation on our establishment's workplace security policies, procedures and work practices.
- Periodic review of our Workplace Harassment Prevention Program with all personnel.
- Training programs designed to address specific aspects of workplace security unique to our establishment.
- Regularly scheduled safety meetings with all personnel that include workplace security discussions.
- A system to ensure that all workers, including managers and supervisors, understand the workplace security policies.
- Posted or distributed workplace security information.
- A system for workers to inform management about workplace security hazards or threats of violence.
- Procedures for protecting workers who report threats from retaliation by the person making the threats.

#### 3.6.6 Reporting and Investigation Procedure

Incidents of workplace harassment must be reported and investigated. The following provides information on how to report an incident of harassment and how an incident of harassment will be investigated:

- In the event of workplace harassment related incident any worker shall immediately contact the client or contracted security staff, local law enforcement agencies and the Mobile Energy Systems Corporate Human Resources department.
- The worksite will strictly follow Mobile Energy Systems policies and procedures for a thorough investigation of the incident.

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- The Mobile Energy Systems Human Resources department shall lead the investigation with the assistance of those parties designated by the Human Resources department.

### Investigation

Our procedures for investigating incidents of workplace harassment include:

- Reviewing all previous incidents.
- Visiting the scene of an incident as soon as possible.
- Interviewing threatened or injured workers and witnesses.
- Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behaviour by the perpetrator.
- Determining the cause of the incident.
- Taking corrective action to prevent the incident from recurring.
- Recording the findings and corrective actions taken.
- The involved parties will be informed of the results of the investigation

### 3.6.7 Training and Instruction

Workers are provided workplace harassment training. When a risk of harassment in the workplace is identified Mobile Energy Systems must train workers in the harassment prevention policy. We have established the following policy on training all workers with respect to workplace harassment and security.

All workers, including managers and supervisors, shall have training and instruction on general and job-specific workplace security practices. Training and instruction shall be provided when the Workplace Harassment Prevention Program is first established and periodically thereafter. Training shall be provided to all new workers and to other workers for whom training has not previously been provided. It shall also be provided to all workers, supervisors, and managers given new job assignments for which specific workplace security training for the job assignment has not previously been provided. Additional training and instruction will be provided to all personnel whenever Mobile Energy Systems is made aware of new or previously unrecognized security hazards.

General workplace harassment and security training and instruction include, but are not limited to, the following:

- Explanation of the Workplace Harassment Prevention Program including measures for reporting any incidents of harassment.
- Recognition of workplace harassment and security hazards including the risk factors associated with the types of harassment.
- The policy, procedures, and workplace arrangements that effectively minimize or eliminate workplace harassment.
- Post-event trauma counselling for those workers desiring such assistance.
- Personal security measures
- Techniques and skills to manage and resolve conflicts
- The importance of reporting, how to report incidents, and who to contact for support for assistance
- Specific instructions to all workers regarding workplace security hazards unique to their job assignment, to the extent that such information was not already covered in other training.

### Supervisory and Safety Staff Training

- Methods to encourage workers to report incidents of harassment
- Methods to support workers who report incidents

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- Skill in handling crisis situations, identifying the warning signs of aggression
- Techniques and skills to manage and resolve conflicts
- Identifying precipitating factors (e.g., mental health issues, workplace stress, substance abuse)

### 3.6.8 Program Recordkeeping and Review

Periodic updates and reviews of the following workplace harassment reports and records will be made:

- Workplace harassment incident reports
- Information compiled for recording harassment incidents or near-assault incidents
- Insurance records
- Police reports
- Workplace survey
- Accident investigations
- Training records
- Grievances
- Inspection information
- Other relevant records or information

The Workplace Harassment Policy and Procedure will be reviewed and updated:

- Every three years, as required by legislation
- Following an incident of harassment
- When the JHSC or HS representative makes a recommendation

## 3.7 Workplace Violence

### 3.7.1 Key Responsibilities

#### Safety Manager

Mobile Energy Systems has a written Workplace Violence program. Mobile Energy Systems has developed a policy and procedures respecting potential workplace violence in Alberta.

#### Manager

- Responsible for the implementation and maintenance of the plan for the workplace and ensuring all assets are made available for compliance with the plan.
- Enforcing by immediate, and with no hesitation, steps to immediately address any incident of workplace violence.

#### Employees

- All shall be familiar with this procedure and the local workplace violence plan.
- Shall immediately report any exposure to or knowledge of workplace violence to their supervisor.

### 3.7.2 Definitions

**Violence:** means the attempted or actual exercise by a person, other than a worker, of any physical force so as to cause injury to a worker and includes any threatening statement or behaviour which gives a worker reasonable cause to believe that he or she is at risk of injury.



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**Improper Activity or Behaviour:** also includes the attempted or actual exercise by a worker towards another worker using physical force to cause injury and including any threatening statement or behaviour which gives the worker reasonable cause to believe he or she is at risk of injury. Horseplay, practical jokes, unnecessary running or jumping or similar conduct will also not be tolerated in the workplace.

**Physical Attack or Aggression:** includes hitting, shoving, pushing or kicking a worker, throwing an object at a worker, kicking an object that a worker is standing on.

**Threatening Behaviour:** includes shaking a fist in a workers face, wielding a weapon at work, trying to hit a worker, trying to run down a worker using a vehicle or equipment such as a forklift, destroying property or throwing objects.

**Verbal or Written Threats:** such as verbally threatening to attack a worker, leaving threatening notes or sending threatening emails to express an intent to inflict harm on a worker.

**Domestic Violence:** is a pattern of behaviour used by one person to gain power and control over another with whom a person has or had a personal relationship with. This can range from subtle, coercive forms of violent acts that result in physical harm or death.

**Sexual Violence:** refers to any sexual act, attempt to obtain a sexual act, or other act directed against a workers sexuality using coercion, by any person regardless of their relationship to the victim in a workplace or work related setting. Sexual violence exists on a continuum from obscene name-calling to rape and/or homicide and includes online forms of sexual violence and sexual exploitation.

### 3.7.3 Mobile Energy Systems' Responsibility to Inform Employees

Mobile Energy Systems must inform workers who may be exposed to the risk of violence of the nature and extent of the risk. The duty to inform workers includes a duty to provide information when a risk of violence is identified related to the risk of violence from other known persons who have a known history of violent behaviour and/or whom workers are likely to encounter in the course of their work.

Mobile Energy Systems will ensure that workers are instructed in how to recognize workplace violence, the policy, procedures and workplace arrangements that effectively minimize or eliminate workplace violence, the appropriate response to workplace violence, including how to obtain assistance and procedures for reporting, investigating and documenting incidents of workplace violence.

### 3.7.4 Risk Assessment

A risk assessment must be conducted to evaluate the risk of workplace violence. Mobile Energy Systems must identify and assess the risk of violence in the workplace in consultation with the committee at the workplace, the representative at the workplace or when there is no committee or representative, the workers at the workplace.

### 3.7.5 Workplace Hazard Control and Prevention

Mobile Energy Systems will identify and institute a combination of control measures designed to eliminate or mitigate the risks of violence incidents. Traditional methods of engineering and administrative controls include the following:

#### Engineering Controls

Engineering controls to consider for the local workplace violence plan include:

- Is lighting adequate to eliminate dark areas and heavy shadows and deter potential incidents from occurring?
- Are adequate escape and access routes present and known to the workers?
- Are all unused doors locked to limit access?
- Is access to work areas controlled and are there access procedures established for visitors?



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- Is there a list of "restricted visitors" or trespassers and is it maintained?
- Is entry to the area/building controlled with carded entry or security staff?
- Are physical security devices required (e.g., Closed Circuit TV, door locks, panic alarms)?
- Is there an effective means of communication between the worker and persons capable of responding to the worker's needs?

#### Administrative Controls

Administrative controls to consider for the local workplace violence plan include:

- Are the duties that create a safety risk necessary? Can modification or elimination of these duties be made?
- Are work procedures developed?
- Is staff trained in work procedures?
- Is there sufficient and qualified staff coverage during times of greater risk?
- Can staff double-up for specific locations or situations where the probability of violence is higher?
- Can money handling be reduced or improved?
- Has the local workplace Working Alone Plan factored in workplace violence threats?
- Is an escort or buddy service required for workers working after hours?
- Can hours of operation be modified to close the workplace to the public during high-risk hours (late at night and early in the morning)?

#### 3.7.6 Compliance

All workers are responsible and will be held accountable for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe and secure work environment.

A person must not engage in any improper activity or behaviour at a workplace that might create or constitute a hazard to themselves or to any other person. Improper activity or behaviour must be reported and investigated.

Managers, supervisors and workers will comply with work practices that are designed to make the workplace more secure and will not engage in threats or physical actions which create a security hazard for others in the workplace. Managers and supervisors will:

- Inform workers, supervisors and managers about our Workplace Violence Prevention Program.
- Evaluate the performance of all workers in complying with our establishment's workplace security measures.
- Recognize workers who perform work practices which promote security in the workplace.
- Provide training and/or counselling to workers who need to improve work practices designed to ensure workplace security.
- Discipline workers for failure to comply with workplace security practices.
- Follow established workplace security directives, policies and procedures.

Managers and supervisors will maintain an open, two-way communications system on all workplace safety, health and security issues. Our establishment has a communication system designed to encourage a continuous flow of safety, health and security information between management and our workers without fear of reprisal and in a form that is readily understandable. Our communication system consists of the following items:

- New worker orientation on our establishment's workplace security policies, procedures and work practices.
- Periodic review of our Workplace Violence Prevention Program with all personnel.
- Training programs designed to address specific aspects of workplace security unique to our establishment.

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- Regularly scheduled safety meetings with all personnel that include workplace security discussions.
- A system to ensure that all workers, including managers and supervisors, understand the workplace security policies.
- Posted or distributed workplace security information.
- A system for workers to inform management about workplace security hazards or threats of violence.
- Procedures for protecting workers who report threats from retaliation by the person making the threats.

### 3.7.7 Workplace Security Inspections

Inspections to identify and evaluate workplace security hazards and threats of workplace violence will be performed on the following schedule:

- Monthly
- When new, previously unidentified security hazards are recognized
- When occupational injuries or threats of injury occur, and
- Whenever workplace security conditions warrant an inspection.

Periodic inspections for security hazards consist of identification and evaluation of workplace security hazards and changes in worker work practices and may require assessing for more than one type of workplace violence. Our establishment performs inspections for each type of workplace violence by using the methods specified below to identify and evaluate workplace security hazards.

#### By Strangers (Type 1)

- The exterior and interior of the workplace for its attractiveness to robbers.
- The need for security surveillance measures, such as mirrors or cameras.
- Posting of signs notifying the public that limited cash is kept on the premises.
- Procedures for worker response during a robbery or other criminal act.
- Procedures for reporting suspicious persons or activities.
- Posting of emergency telephone numbers for law enforcement, fire and medical services where workers have access to a telephone with an outside line.
- Limiting the amount of cash on hand and using time access safes for large bills.
- Staffing levels during evening hours of operation and at other high risk times.
- The use of work practices such as "buddy" systems, as appropriate, for identified risks (e.g., walking workers to their cars or mass transit stops at the end of the workday).
- Adequacy of lighting and security for designated parking lots or areas.

#### By Clients (Type 2)

- Access to and freedom of movement within, the workplace.
- Adequacy of workplace security systems, such as door locks, security windows, physical barriers and restraint systems.
- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
- Employees' skill in safely handling threatening or hostile service recipients.
- Effectiveness of systems and procedures to warn others of a security danger or to summon assistance e.g. alarms or panic buttons.

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- The use of work practices such as "buddy" systems, as appropriate, for identified risks (e.g., walking workers to their cars or mass transit stops at the end of the workday).
- Adequacy of lighting and security for designated parking lots or areas.
- The availability of worker escape routes.

#### **By Co-Workers (Type 3)**

- How well our establishment's anti-violence policy has been communicated to workers, supervisors and managers.
- How well our establishment's management and workers communicate with each other.
- How well our workers, supervisors and managers know the warning signs of potential workplace violence.
- Access to and freedom of movement within, the workplace by non-workers, specifically recently discharged workers.
- Frequency and severity of worker-reported threats of physical or verbal abuse by managers, supervisors or other workers.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.
- Employee disciplinary and discharge procedures.

#### **Personal Relations**

- Access to and freedom of movement within, the workplace by non-workers, specifically personal relations with whom one of our worker's is having a dispute.
- Frequency and severity of worker-reported threats of physical or verbal abuse which may lead to violent acts by a personal relation.
- Adequacy of workplace security systems, such as door locks, security windows, and physical barriers.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs.
- The use of work practices such as "buddy" systems, as appropriate, for identified risks (e.g., walking workers to their cars or mass transit stops at the end of the workday).
- Adequacy of lighting and security for designated parking lots or areas.
- Warnings or police involvement to remove personal relations of workers from the worksite and effectiveness of restraining orders.
- All workers who obtain a protective restraining order, which lists Mobile Energy Systems or client premises as being a protected area, must provide to their immediate supervisor a copy of any temporary or permanent protective or restraining order.
- Mobile Energy Systems understands the sensitivity of the information requested and has developed confidentiality procedures, which recognizes and respects the privacy of the worker(s).

#### **3.7.8 Physician Consulting**

Victims of workplace violence are advised to consult a health professional. Mobile Energy Systems must ensure that a worker is advised to consult a health professional of the worker's choice for treatment or referral if the worker reports an injury or adverse symptom resulting from workplace violence or is exposed to workplace violence. Employers cannot make any deductions from the workers wages and benefits if the treatment sessions occur during regular working hours.

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### 3.7.9 Reporting and Investigation Procedure

Incidents of workplace violence must be reported and investigated. The following provides information on how to report an incident of violence and how an incident of violence will be investigated:

- In the event of workplace violence related incident, assistance must be summoned immediately. This includes:
  - Calling out for someone nearby to come help,
  - Summoning law enforcement
  - Finding a secure place to wait for assistance to arrive.
- All instance of workplace violence must be reported to a supervisor or manager.
- The worksite will strictly follow Mobile Energy Systems policies and procedures for a thorough investigation of the incident.
- The Mobile Energy Systems Human Resources department shall lead the investigation with the assistance of those parties designated by the Human Resources department.

#### Investigation

Our procedures for investigating incidents of workplace violence—threats and physical injury—include:

- Reviewing all previous incidents.
- Visiting the scene of an incident as soon as possible.
- Interviewing threatened or injured workers and witnesses.
- Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behaviour by the perpetrator.
- Determining the cause of the incident.
- Taking corrective action to prevent the incident from recurring.
- Recording the findings and corrective actions taken.
- All involved parties will be informed of the investigation results.

### 3.7.10 Training and Instruction

Workers are provided workplace violence training. When a risk of violence in the workplace is identified Mobile Energy Systems must train workers in the violence prevention policy. We have established the following policy on training all workers with respect to workplace violence and security.

All workers, including managers and supervisors, shall have training and instruction on general and job-specific workplace security practices. Training and instruction shall be provided when the Workplace Violence Prevention Program is first established and periodically thereafter. Training shall be provided to all new workers and to other workers for whom training has not previously been provided. It shall also be provided to all workers, supervisors, and managers given new job assignments for which specific workplace security training for the job assignment has not previously been provided. Additional training and instruction will be provided to all personnel whenever Mobile Energy Systems is made aware of new or previously unrecognized security hazards.

General workplace violence and security training and instruction include, but are not limited to, the following:

- Explanation of the Workplace Violence Prevention Program including measures for reporting any violent acts or threats of violence.
- Recognition of workplace violence and security hazards including the risk factors associated with the types of violence.

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- The policy, procedures, and workplace arrangements that effectively minimize or eliminate workplace violence.
- Ways to defuse hostile or threatening situations.
- Measures to summon others for assistance.
- Employee routes of escape.
- Notification of law enforcement authorities when a criminal act may have occurred.
- Emergency medical care provided in the event of any violent act upon a worker.
- Post-event trauma counselling for those workers desiring such assistance.
- Personal security measures
- Ways of preventing or diffusing volatile situations or aggressive behaviour
- How to deal with hostile persons
- Techniques and skills to manage and resolve conflicts
- The importance of reporting, how to report incidents, and who to contact for support for assistance
- Specific instructions to all workers regarding workplace security hazards unique to their job assignment, to the extent that such information was not already covered in other training.

#### **Supervisory and Safety Staff Training**

- Methods to encourage workers to report incidents of violence
- Methods to support workers who report incidents
- Skill in handling crisis situations, identifying the warning signs of aggression
- Techniques and skills to manage and resolve conflicts
- Identifying precipitating factors (e.g., mental health issues, workplace stress, substance abuse)

#### **3.7.11 Program Recordkeeping and Review**

Periodic updates and reviews of the following workplace violence reports and records will be made:

- Workplace violence incident reports
- Information compiled for recording assault incidents or near-assault incidents (i.e. Threat and Assault Log)
- Insurance records
- Police reports
- Workplace survey
- Accident investigations
- Training records
- Grievances
- Inspection information
- Other relevant records or information

The Workplace Violence Policy and Procedures shall be reviewed and revised:

- Every three years, as required by legislation
- Following an instance of workplace violence
- When the JHSC or HS representative makes a recommendation

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## 4.0 HEALTH AND SAFETY REPRESENTATIVE

A health and safety representative works together with management to identify and solve health and safety concerns at the worksite. Health and Safety Representatives also promote awareness and interest in health and safety.

All Workers and Employers are accountable for health and safety. The Health and Safety representatives form an important part of this internal responsibility system and further ensure that worksite parties are aware of their roles and responsibilities in the workplace.

Health and Safety representatives contribute to the basic rights all workers have in protecting their health and safety: the right to know, the right to participate, and the right to refuse dangerous work.

### 4.1 Health and Safety Representative Requirements

- Employers with 5 to 19 workers are required to have a Health and Safety Representative
- The Health and Safety Representative is chosen by the workers, unless prescribed by a union agreement.
- The Health and Safety Representative participates in workplace inspections and incident investigations.
- The health and safety representative must hold their post for a minimum of one year.

Mobile Energy Systems shall provide the Health and Safety Representative with training about the duties and functions of their role. Mobile Energy Systems shall permit the health and safety representative, to take annually whichever is greater – 16 hours or the number of hours the worker normally works during two shifts – to attend worksite health and safety training programs, seminars or courses. During training, the health and safety representative is deemed to be at work and must be paid at their regular rate of pay.

#### 4.1.1 Duties of Health and Safety Representatives

Health and safety representatives perform several duties and functions to help prevent injuries and illness. Similar to a health and safety committee, these duties include:

- Receive and address concerns and complaints about the health and safety of workers.
- Participate in the identification of hazards to workers or other persons arising out of or in connection with activities at the worksite, and the control of those hazards
- Develop and promote measures to protect the health and safety of persons at the worksite and checking the effectiveness of the measures.
- Cooperate with an OHS officer exercising their duties.
- Develop and promote programs for education and information concerning health and safety.
- Make recommendations to Mobile Energy Systems, prime contractor or owner respecting the health and safety of workers, and to improve the overall health and safety management system.
- Participate in investigations of serious injuries and incidents at the worksite, maintain records in connection with concerns and complaints and attend to other matters relating to the duties of the Health and Safety Representative.
- Maintaining records pertaining to their duties.
- Other duties as may be specified in the Occupational Health and Safety Act (OHS Act, Regulations and Code.)

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## 4.2 Right to Refuse Work

Under the *OHS Act*, workers have the right to refuse any work they believe in good faith to be unusually dangerous. A work refusal is initiated by the worker and when initiated in good faith shall not result in discriminatory action by Mobile Energy Systems.

The various scenarios involving work refusals could involve several different parties at the work site. Where no Health and Safety Committee or Health and Safety Representative exists, the following provides a brief summary of the steps the worker must take. For further guidance on the prescribed procedure, consult the *OHS Act*.

If a worker believes that the assigned work is dangerous, the refusal and the reason for the refusal is promptly reported to Mobile Energy Systems or supervisor; the worker must also ensure that, as far as reasonably practicable, their refusal does not endanger anyone else.

On completion of the inspection, Mobile Energy Systems will prepare a written report of the refusal, the inspection, and action taken. A copy of the report is provided to the worker.

The action taken as a result of the inspection could include measures to address any identified hazards, or if the dangerous condition still exists, the Health and Safety Representative, the worker, or any worksite party may contact OHS for further advice.

*(Form – Work Refusal)*

## 4.3 Addressing Health and Safety Concerns and Complaints

When a health and safety concern or complaint arises, the employee should bring that concern or complaint to a health and safety representative. The health and safety representative must encourage the workers to bring forward their complaints. This can be done through:

- Informal conversations while walking through the workplace.
- Safety meetings.
- Contact during inspections and investigations.

When addressing concerns or complaints:

- Encourage workers to bring specific concerns to their supervisor and general concerns to the committee or representative.
- If a concern cannot be resolved with the supervisor, it must be brought to the committee or representative for investigation.
- Keep the worker and supervisor informed during the investigation.
- If the representative cannot resolve the concern, they should bring in management assistance.
- The representative helps the worker and employer by gathering information on the risks posed by each hazard identified and alternative courses of action.
- Take recommendations to the employer for corrective action. Keep workers informed.
- If the representative and employer cannot resolve a health and safety concern, any worksite party may contact Alberta OHS to refer the matter to an OHS officer.
- Communicate the status and final resolution of the concern to everyone involved. Post the meeting minutes, distribute bulletins, or hold discussions with workers, supervisors, and managers.
- The representative can help everyone concerned by monitoring the effectiveness of the corrective action the employer has taken.



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#### 4.4 Inspection of The Work Site and Incident Investigations

The Health and Safety Representatives members play an important role in worksite inspections and incident investigations. A brief summary of these duties is outlined in this section.

Participation in worksite inspections:

- Inspecting the worksite at regular intervals is one of the duties of the committee. Regular inspections have been shown to reduce injuries and illnesses, and to improve the internal responsibility system.
- An inspection is a planned walkthrough of the worksite to identify safety or health hazards that may be present. An inspection may examine a selected work area or particular hazard, certain types of machinery, tools or equipment, or specific work practices.
- Mobile Energy Systems and Health and Safety Representative need to consider many factors to determine the appropriate frequency for worksite inspections. These may include the size of the worksite, type of activities, and number of workers.
- In addition to providing the training, resources and time needed to carry out the duties of the representative, Mobile Energy Systems can help the representative plan and schedule inspections and assist with developing inspections checklists. The health and safety representative must also be allowed to accompany an OHS officer who is conducting an inspection, should the officer request it.

Participation in incident investigations

- Investigating incidents is a key role of the health and safety representative.
- The health and safety representative will be involved in all incident investigations on site.
- The investigation procedures listed in the HSMS are to be adhered to.

#### 4.5 Recommendations to Mobile Energy Systems

The health and safety representative must make all recommendations in writing with a set action time and persons responsible for implementation. The recommendations must be signed by the committee co-chairs / health and safety representative before they are forwarded to Mobile Energy Systems Senior Management. All recommendations must be made separate from the minutes of the meeting.

Mobile Energy Systems is required, under the OHS Regulation, to respond to the recommendations within 21 days of receiving the written request. Mobile Energy Systems must respond in writing by:

- Indicating acceptance of the recommendation, or
- Giving Mobile Energy Systems' reasons for not accepting the recommendation.

If Mobile Energy Systems is not reasonably able to provide a response before the end of the 21-day period, Mobile Energy Systems will be asked by the committee to provide - within that time - a written explanation for the delay, together with an indication of when the response will be provided.

If the representative is not satisfied that the explanation provided for the delay is reasonable - in the circumstances – they may report this to OHS. OHS may investigate the matter and may, by order, establish a deadline by which Mobile Energy Systems must respond.

*(Forms – Committee Recommendation)*

#### 4.6 Posting Representative Information

The Mobile Energy Systems shall promptly post and keep posted at the workplace, in a place readily accessible to employees, the following:



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- The name of the health and safety representative
- The contact information of the health and safety representative.

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## 5.0 QUALIFICATIONS, ORIENTATION AND TRAINING

### Objectives

- To ensure the competence of personnel (physically and mentally capable of the task assignment) to carry out their designated function.
- The material in this document does not take precedence over applicable government legislation which all employees must follow.

### Assignment of Responsibilities

#### *Health and Safety Representative*

- Identifies, updates and monitors training for workers.

#### *Managers and Supervisors*

- Shall ensure all workers assigned to their project complete training identified.
- Shall ensure that any work that may endanger a worker must be completed by a worker who is competent to do the work.
- Shall ensure all workers assigned to their project are trained in procedures until they are competent, and
- Shall ensure all workers have sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

#### *Employees*

- Attend and follow requirements of health and safety training.

### 5.1 Qualifications

Minimum qualification and training requirements for each job title have been established by Mobile Energy Systems. Qualifications may include a combination of education, certifications and work experience. Health and safety training completion for the specific job title is required before full qualifications are met to allow a worker to begin work. Additional documentation may need to be obtained from workers to demonstrate they meet the qualifications of their job. Based on the job description requirements documentation may include educational, certifications, licenses, prior acceptable training course completion, etc. Documentation is reviewed and confirmed as actual during the worker hiring process.

### 5.2 Minimum Standards for Hiring

- Must be neat and clean
- Copy of current (within 30 days) operator's license abstract
- Supply three references
- Must be able to read and write well enough to perform job duties and comprehend written material
- Must be willing to participate in a Drug and Alcohol Testing if requested
- Must be willing to complete a pre-employment medical exam if requested
- Must be willing and able to obtain all required safety certification training

The completed application form provides detailed background information to allow proper evaluation of a prospective employee.

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### 5.3 HSE Competency Assurance Process

HSE Competence is a combination of knowledge, understanding and skill, and the appropriate level of competence cannot be acquired simply by attending a training session. The understanding and skill are acquired by experience. For individuals controlling health and safety hazards and risks, experience and training are essential. The following components are to be considered for each worksite's delivery team for HSE competency assurance:

<b>Experience</b>	<b>Level of Knowledge</b>	<b>Capability to Perform</b>
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Upon hire with Mobile Energy Systems the health and safety representative will participate in the competency assurance process. This process begins with the selection of the person who enters a continuous improvement loop that will stay with the worker during his career with Mobile Energy Systems. At Mobile Energy Systems our view of competency assurance involves the continuous assessment of training and development needs against a person's responsibilities, abilities and critical activities. The individual gathers evidence of competence, behaviour, and personal development for health and safety. This process enables the continuous improvement loop that feeds back into training and development activities that ensure competency assurance is an ongoing career cycle process.

1. Job Description Identified → Candidate Selection and Hiring Process (Reference and Background Check, Drug Screen, Physical Assessment) → Person Assessed and Hired for Open Position
2. Experience, Qualifications Assessed for Initial Training → Initial Induction Training Completion
3. Further Training Required? If no → Ready for Work → On the Job Training → Competency Continually Assessed

For individuals directly managing risk the specific requirements will be matrixed with training for areas such as legislative requirements, client HSE requirements and recognized certification and licensing.

*(Forms – Job Specific Competency Assessments)*

### 5.4 Operator Qualifications and Training

All individuals who operate mobile equipment, vehicles etc. will have the appropriate skills, accreditation and/or certification. This applies to both company workers and contracted equipment services. The approval process includes the following:

- Possession of a valid driver's license appropriate to the type of equipment
- Successful completion of a practical operating exam administered by competent and authorized personnel
- No history of epilepsy or of a disabling heart condition or any other physical disability or impairment

The operator shall be trained in the following:

- Their responsibilities to operate the equipment in a safe manner
- Familiarity and comprehension of safety requirements for the piece of mobile equipment which they intend to operate
- Manufacturer's operating and maintenance procedures.
- Hand signals and/or other requirements set by Mobile Energy Systems

#### Driver Qualifications

A "Qualified driver" is one who has the required class of operating license for the specific vehicle being driven.

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## 5.5 Orientations

Employees shall receive initial induction training. No work by any worker is allowed to begin until the orientation is completed.

New employee orientations are completed during the first week of employment and before the new employee starts work. The orientation topics are prioritized, and critical health and safety information are covered during the first day of employment. Critical issues include:

- Safety Policies and Rules
- Three Worker Rights (Right to Know, Right to Participate, Right to Refuse)
- Safety Meetings
- Workplace Inspections
- Safety Responsibilities
- Injury and Incident Reporting
- Reporting - Unsafe Acts/Conditions
- Communication
- Engineering Controls, Administrative Controls, and PPE Requirements
- Disciplinary Policy
- First Aid Procedure and Reporting
- Working Alone
- Violence and Harassment Policy and Procedures
- Housekeeping
- Hazard Assessments and Review: identification of critical hazards
- Drug and Alcohol Policy
- Fire Protection Safety
- Waste Minimization & Handling
- Emergency Equipment & Procedures
- Inspections, Maintenance & Scheduling
- Emergency Response Procedures
- Toxic/Hazardous Substances/Bio-Hazardous Substances
- SDS
- WHMIS Training
- Safety Intervention (authority to stop unsafe work)
- JHSC or Safety Representative identification

Specific safe work procedures and practices are also reviewed during orientation and, if required, health assessments (such as hearing tests) are done at this time.

Transferred or reassigned employees receive orientations before they start their new job. Documentation of when orientations were done, who conducted the training, topics and the names of the workers trained is completed via the Mobile Energy Systems Health and Safety Orientation Checklist which requires employee and supervisor sign-off.

*(Form – New Employee Orientation Checklist)*

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## 5.6 Worker Training

### 5.6.1 Identification of Training and Competency Needs

Training is identified in our training matrix which specifies health and safety training needs by job title. Our training matrix is continually updated based on changing risks.

### 5.6.2 Training Records and Documentation

All training records are maintained on site either by the Health and Safety Representative or senior representative of management or their designee. All training must be documented with: date; worker name, worker signature; instructor name; instructor signature and title of course.

### 5.6.3 Manager and Supervisor Safety Training

Newly hired or promoted supervisors and managers receive safety management system training. Training shall consist of:

- Job responsibilities
- Regulations and legislative requirements
- Health and safety policies and procedures
- Supervisory Skills
- Safe work practices
- Toolbox and safety meetings
- Emergency procedures
- Hazard identification, assessment and control
- Workplace inspections
- Incident investigation methods and responsibilities
- Employee discipline
- New employee orientation

## 5.7 Short Service Employee Program

The purpose of the Short Service Employee (SSE) Management program is to prevent work related injuries and illnesses to new hires and temporary workers. The Supervisors and co-workers must be able to readily identify Short Service Employee participants. Mobile Energy Systems will assign experienced workers to oversee the daily activities of those assigned to the SSE program.

**NOTE:** Refer to the Mobile Energy Systems Short Service Employee Program.

## 5.8 Job Specific Training

Workers will also require specific on-the-job training to do their jobs in a safe and effective manner. Using hazard assessment data Mobile Energy Systems must assess which jobs require job-specific training and ensure training is provided for the completion of tasks where specific health and safety hazards are known to exist.

Mobile Energy Systems will determine who is competent to provide this training and the supervision required until the worker is deemed competent. Job-specific training will be provided to both new and transferred workers and refresher training will also be held on a regular schedule.

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## 5.9 Probationary Period

Mobile Energy Systems enforces a 90-120-day probationary period in which time the job performance will be carefully monitored and evaluated. If the employee is observed to have a disregard for safe practices, they will be terminated during this time period. If it is discovered that the employee provided false information on the application or the medical questionnaire, the employee will be subject to termination. If the employee is unable to complete the job, he/she was hired to do the employee will be terminated. If the employee cannot get along with others, then the employee will be terminated.

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## 5.10 Safe Work Rules

SAFE WORK RULES	
<p>Mobile Energy Systems is committed to safety excellence for all employees by providing an injury-free workplace. The following rules will help ensure everyone's safety:</p> <ul style="list-style-type: none"> <li>• Everyone is expected to know and follow (insert department/crown corporation) health and safety management system.</li> <li>• All employees are expected to lead in safety excellence by example.</li> <li>• All unsafe acts, conditions, incidents, including "near misses", are to be documented and reported to the appropriate supervisor immediately.</li> <li>• Any employee who notices a hazard must correct it immediately if it is safe to do so, otherwise further access to the hazard should be limited or prevented so that it can be corrected in a safe manner. In either case the hazard should be reported to a supervisor without delay.</li> <li>• Appropriate Personal Protective Equipment, including, safety footwear, safety glasses, etc. and head protection must be worn when a potentially hazardous condition exists.</li> <li>• Every employee shall keep his/her work area neat, clean, orderly and free of hazards.</li> <li>• Everyone is expected to know who the First Aid Attendant responsible for their area is, as well as the appropriate building evacuation procedures.</li> <li>• Employees must receive appropriate training, prior to performing tasks that present hazards. Example: Confined space, fall protection etc.</li> <li>• Employees shall report any medical condition to their immediate supervisor if this medical condition is determined to impede the safety of themselves and others.</li> <li>• Consuming or being in possession of alcohol or illegal drugs in the workplace is prohibited.</li> <li>• All employees must be "fit for work" to work. They must be physically and psychologically fit to perform the duties of their job while on the job.</li> <li>• Fighting, horseplay, practical jokes or otherwise interfering with other employees is prohibited.</li> <li>• Theft, vandalism or any other abuse or misuse of government property is prohibited.</li> <li>• First aid treatment is to be obtained promptly for any injury and documented and reported.</li> <li>• Listening to music or radio through earphones or any type of headphone is prohibited.</li> <li>• Use of handheld communication devices while operating any piece of equipment is prohibited.</li> <li>• Abusive behaviour, physical or verbal is prohibited.</li> <li>• Each employee will adhere to the proper legislative requirements, follow all safe work practice and procedures for any firearms that are required to be used as part of your day to day operations.</li> <li>• To ensure their safety, every supervisor will know the general whereabouts of the employees they supervise. This includes out of town travel.</li> <li>• All motorized transportation (including but not limited to: all-terrain vehicles, boats, light duty vehicles and heavy equipment) will be inspected prior to use and maintained according to the manufacturers specifications.</li> <li>• All employees are responsible for their own safety and the safety of their co-workers.</li> <li>• Supervisors and employees will complete required reports for all injuries, regardless of whether or not there is lost time, within 3 calendar days from the incident.</li> <li>• All employees when traveling in a motorized vehicle for work purposes shall obey all rules and regulations covering operation.</li> </ul> <p>I, _____ have been supplied with a copy of and have read and been explained the Mandatory Rules and Regulations for company employees. I understand them and will abide by them during my employment with the company.</p> <p>I understand clearly that infraction of any of the above rules is grounds for disciplinary action which may include termination and I will be advised of any additional changes to the above safety and work rules.</p> <p>Employee Signature _____ Date ____/____/____</p>	

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## 6.0 Other Parties at the Worksite

### 6.1 General Requirements for Subcontractors

All Mobile Energy Systems subcontractors are to be managed in accordance with this program.

The use of subcontractors must be pre-approved by Mobile Energy Systems. Approval requirements include:

- A formal safety review of the subcontractor being performed by Mobile Energy Systems safety department.
- The scope of the review was commensurate with the hazards and risk exposure.
- Subcontractor will be oriented to the safety policies, expectations, and requirements of Mobile Energy Systems.
- The subcontractor agrees to abide by our Drug and Alcohol policy as well as our and our client's safety rules throughout the duration of the work.

#### 6.1.1 Rejection Guidelines

Any subcontractor that has a "Non-Approved" safety status will not be used on any Mobile Energy Systems site.

In the event that a subcontractor does not have a health and safety manual, Mobile Energy Systems would be responsible for making sure the subcontractor is aware of applicable health and safety policies, procedures and regulations. If a subcontractor does not have a health and safety manual, they would be classified as "Non-Approved" and not utilized for services.

#### 6.1.2 Contractor Safety Management Process

##### 6.1.2.1 Pre-Qualification of Subcontractors

Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents and safety statistics.

Mobile Energy Systems must confirm subcontractors have valid Workers Compensation coverage. Mobile Energy Systems must ensure it obtains proof of workers' compensation coverage from their subcontractors. Subcontractors who are not required to have workers' compensation coverage must obtain approval from their Owner Client(s) before they are allowed to enter the worksite.

##### 6.1.2.2 Evaluation Safety Metrics

Acceptable safety metrics will be used as criteria for prequalifying and selecting subcontractors.

HSE programs and training documentation are reviewed when selecting subcontractors. Written HSE programs and training documentation applicable to the type of work the subcontractor will perform are obtained and reviewed to assist with the hiring of safe subcontractors.

HSE statistics (workers' compensation rate sheets) are reviewed when selecting subcontractors. Past performance is a key indicator of future performance. HSE statistics are obtained and analyzed to ensure that only safe subcontractors are hired. Mobile Energy Systems will obtain a copy of the subcontractor's workers compensation rate sheet and compare their performance to others in their industry. Those who outperform the industry should be selected whenever practicable.

The safety metrics and scoring will consider:

- Mobile Energy Systems Subcontractor Safety Pre-Qualification Form responses and subcontractor safety program documents review



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- Subcontractor safety training documents review
- Subcontractor safety statistics (workers' compensation rate sheets)

#### **6.1.2.3 Evaluation and Acceptance**

Once each subcontractor has been evaluated, Mobile Energy Systems will move forward with a contract with the subcontractor.

Mobile Energy Systems reserves the right to change a subcontractor's status to "Non-Approved" if the subcontractor shows insufficient progress towards accepted mitigation plan or other agreed upon criteria.

#### **6.1.3 Subcontractor Involvement & Continual Improvement**

Upon selection subcontractors are provided the following information:

- A site orientation is provided to subcontractors. Subcontractors must be provided a site orientation that addresses health, safety, security and/or environmental concerns.
- Mobile Energy Systems is accountable for communicating the client's drug and alcohol policy to subcontractors. Mobile Energy Systems must ensure that subcontractors are aware of the client's drug and alcohol policy. Subcontractors must adhere to the requirements of the drug and alcohol policy at all times while at the worksite.

Contractors are required to follow the work practices and systems described below while performing work at Mobile Energy Systems worksites in order to continually improve safety performance:

- Subcontractors are included in pre-job meetings and/or hazard assessments. Subcontractors shall be included in pre-job meetings and hazard assessments. Pre-job meetings can include information taken from a hazard assessment and any other safety or operational concerns.
- Monitor employees for substance abuse and report nonconformities to Mobile Energy Systems.
- Ensure personnel have the required training and competency for their work.
- Participate in Mobile Energy Systems tailgate safety meetings, regular periodic safety meetings, job safety analysis and on the job safety inspections.
- Perform a pre-job safety inspection that includes equipment.
- Participate in the BBS hazard reporting system.
- Report all injuries, spills, property damage incidents and near misses.
- Comply with onsite and Owner Client safety rules.
- Implement Mobile Energy Systems safety practices and processes as applicable.
- Clean up and restore the worksite after the job is over.
- Ensure compliance with regulations at all times.
- Post-job performance reviews are conducted for subcontractors. Post job performance reviews should be conducted for subcontractors. A combination of factors may be considered including, but not limited to, housekeeping, cost, active participation in safety meetings, and quality of work.

#### **6.1.4 Incident Management**

Mobile Energy Systems is accountable for reporting and investigating subcontractor incidents. Mobile Energy Systems must ensure that subcontractors are aware of incident reporting requirements. Subcontractors must report all incidents to Mobile Energy Systems. If a subcontractor is involved in an incident, Mobile Energy Systems is responsible for reporting the incident to the Owner Client. Mobile Energy Systems must ensure the incident is investigated.

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## 6.2 Entering Client Worksites

### 6.2.1 Systems to Control Access or Exiting Customer's Premises

- All vehicles will be properly insured and equipped with all client & legislated vehicle required safety equipment.
- All staff will have proper client required orientation, training and identification prior to entering a client location.
- All staff will log in and log out per client requirements.

## 6.3 General Requirements for Visitors

All Mobile Energy Systems visitors are to be managed in accordance with this program.

- All visitors, with the exception of delivery personnel, must review the Mobile Energy Systems visitor orientation and sign in and out on the Visitor Log.
- Visitors entering Mobile Energy Systems work locations must follow the instructions of the Site Supervisor or company escort.
- Personal protective equipment must be worn as and when required.
- All visitors shall not be exposed to any hazard for which they do not have required training for.

*(Forms – Visitor Sign In, Visitor Safety)*

### 6.3.1 Incident Management

Mobile Energy Systems is accountable for reporting and investigating visitor incidents. Mobile Energy Systems must ensure that visitors are aware of incident reporting requirements. Visitors must report all incidents to Mobile Energy Systems. If a visitor is involved in an incident, Mobile Energy Systems is responsible for reporting the incident to the Owner Client. Mobile Energy Systems must ensure the incident is investigated.

## 6.4 Site Specific Orientations

Contractors are provided with an appropriate orientation before they start work on Mobile Energy Systems worksites. The depth of orientation for contractors will depend on the type of work and level of supervision provided.

Visitors to the worksite will receive a worksite orientation to make them aware of the hazards and what to do if there is an emergency. At a minimum, Mobile Energy Systems will have visitors sign in and provide them with an escort while they are on site.

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## 7.0 INSPECTIONS & PREVENTATIVE MAINTENANCE

The Mobile Energy Systems Inspection & Preventative Maintenance program clearly outlines what needs to be inspected, who will be involved, how often the inspections should be performed and who is responsible for corrective actions and follow-up. The results of the inspection program will provide information on whether the hazard assessment requires review. The written Maintenance Program calls for a regular and continuous program of Inspection. The Inspection and Preventative Maintenance Program pertains to all areas of Mobile Energy Systems operations including lease operators and subcontractors. Contractors must submit a copy of their maintenance program to the office within 2 weeks of being hired. The material in this document does not take precedence over applicable government legislation which all employees must follow.

### Objectives

- To provide a method to review and verify compliance with the Mobile Energy Systems HSMS
- To proactively identify potential hazards that may not have been previously noted
- To confirm the effectiveness of controls already in place
- To demonstrate commitment to health and safety

### Assignment of Responsibilities

#### *Health and Safety Representative*

- Ensures inspections are conducted
- Develops the inspection schedule and scope
- Communicates inspection findings
- Verifies non-compliance and non-conformance areas are corrected
- Tracks inspection findings and communicates progress toward closure of findings

#### *Managers and Supervisors*

- Develops and implements corrective and preventive action for deficiencies
- Tracks inspection findings until the responsible party has corrected the deficiencies
- Participates in site safety inspection

#### *Drivers*

- Maintain the vehicle in good and safe operating condition and repair, suitable for the intended purpose
- Follow all Rules and Regulations.
- Keep the unit washed and clean.
- Complete a pre-trip inspection.
- Complete a monthly maintenance report.

### 7.1 Types of Inspection

**Formal:** Formal inspections have set inspection form conducted at specified time frames

**Informal:** Spontaneous inspections, results noted if non-conformance, defects found

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## 7.2 Informal Inspections

Informal are carried out by workers, supervisors and managers and do not involve a formal report or a specific schedule. Some examples of informal inspections include:

- A manager walking through the shop/worksite may take the opportunity to verify that workers are following safe procedures, using safety equipment or following healthy work procedures and provide feedback on their safety performance.
- An employee conducts a pre-job check on their tools, looking for defects and maintenance needs prior to starting work each day.

The results of an informal inspection will be acted on immediately, required changes will be made on the spot and worker feedback (both positive and constructive) will be made verbally. Inspection information will only be recorded and reported if the situation requires it.

## 7.3 Formal Inspections

### 7.3.1 Inspection/Document Matrix

INSPECTIONS OF:	FREQUENCY	PERSON RESPONSIBLE
Office	Annual	Management
Worksite	Daily	Supervisor
Equipment	Pre-use	Operator
Vehicle	Pre-use	Operator

## 7.4 Inspection Written Details

### 7.4.1 Workplace Inspections

#### Form to be Used:

The individual conducting the workplace inspections will determine the appropriate Inspection form depending on the worksite, to record items identified during the inspection. The forms will serve to prompt inspectors to check for specific items and will create a consistent standard for the gathering of information.

#### The inspector will be looking for:

- Unsafe Conditions: slippery floor, poor lighting, cluttered work area, slipping hazards, missing guards, etc.
- Unsafe Actions: improper use of equipment, workers not wearing personal protective equipment or following safe work procedures, etc.
- Health Hazards: dangerous chemicals, dust exposure, noise, toxic waste, etc.

#### Inspection Instructions:

The deficient items identified on the inspection report will be assigned a corrective action:

- Corrective actions are to be completed in a timely manner
- Corrective actions are to be reviewed by management

Copies of the inspection report will be given to senior management, the Health and Safety Committee (if applicable), and the supervisors of the areas being inspected.

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A copy of the report, including both negative and positive findings, will be posted for workers to review, and a copy will be kept on file for the next inspection team so that they can identify any repeat items.

### Inspection Frequency

Workplaces are inspected once per quarter, or more frequently if non-conformances indicate the need.

### Conducted by:

Work site inspection tours will be performed by management or delegate. Inspections of specific pieces of equipment can be done by an individual, competent worker.

The inspector completes the Mobile Energy Systems worksite inspection form for each inspection by interviewing people, reviewing records and touring the workplace.

Findings are communicated to the appropriate manager and Health and Safety Representative by sending a copy of the checklist to these positions (if applicable). All inspection records will be kept at the company's head office location.

\*Records of inspections and will be kept for future reference and statistical review.

## 7.5 Inspector Training

Inspectors shall be trained. Training should contain, as a minimum the following areas:

- Learning Objectives and Outcomes
- Terms
- The Law
- The Purpose of an Inspection
- Types of Inspections
- What to Look For
- Health and Safety Code
- Unsafe Act
- Unsafe Conditions
- Conducting an Inspection
- Classification of Hazards

## 7.6 Accountability

Non-conformances are to be corrected and are the primary responsibility of the Health and Safety Representative.

## 7.7 Communicating Results of Inspections

Results of the inspections (both positive and negative findings) will be communicated to workers & supervisors and include the expected timelines for follow-up action.

Results shall also be provided to senior management of Mobile Energy Systems via a workplace inspection form.

## 7.8 Inspection Forms

The Worksite Inspection Form is the primary inspection form to be used. Any other inspection forms will include:

- a checklist of items to be inspected
- a description of the hazards to look for

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- space to list suggested actions required to remove or control the hazard
- priority ranking of when the non-conformance needs correcting
- name of the person responsible to correct the problem
- date by which the action is expected
- actual completion date.

All inspection forms will be dated and indicate the location and inspector.

The person named as responsible for inspection follow-up will be the supervisor in control of the area where the hazard is found. The manager has overall responsibility for ensuring corrective action has been taken and should review and sign-off all inspections.

## 7.9 Preventative Maintenance

Preventive maintenance is the systematic care and protection of tools, equipment, machines, vehicles, and facilities to keep them in a safe, usable condition limit downtime and extend productivity. The standards for the maintenance program are based on the manufacturer's recommendations, industry standards, past incidents, and data from company hazard assessments. All tools, equipment, vehicles, and facilities must be properly maintained so that workers are not endangered. Maintenance tasks themselves are potentially hazardous and can result in injury. This maintenance program must be prepared at a site level and:

- Be well organized and scheduled
- Controls hazards
- Defines operational procedures, and
- Trains key personnel

General requirements for equipment maintenance include:

- Mobile Energy Systems will purchase tools and equipment in accordance with CSA, provincial and industrial standards.
- Obtaining a copy of the maintenance schedule recommended by the manufacturer.
- Ensuring that maintenance is performed as required.
- Ensuring that the person(s) performing the maintenance are competent (e.g. licensed mechanic).
- Retaining records of maintenance/service conducted.
- Specifying who is responsible for overseeing equipment maintenance and where the records are kept.
- Set up a system for removal and tagging of damaged or defective tools and equipment.
- Only properly trained workers are to use tools, equipment and vehicles.
- Inspect all tools, equipment and vehicles before using.
- For vehicles, inspection will consist of doing a circle check.
- If applicable, maintenance schedules for all tools, equipment and vehicles are to be respected.
- If at any time a worker judges that a tool, equipment or vehicle is unsafe for use, they are to properly tag the item and inform the supervisor immediately.
- Tools, equipment or vehicles that are tagged unsafe shall be either repaired or replaced - Mobile Energy Systems management shall be informed.

**Maintenance Personnel Qualifications:** All individuals who perform maintenance work on company tools shall have the appropriate skills, accreditation and/or certification. This certification applies both to company workers and to contracted maintenance services.

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**Mobile Equipment Maintenance Program:** All individuals who perform maintenance work on company mobile equipment will have the appropriate skills, accreditation and/or certification. This certification applies both to company workers and to contracted maintenance services.

**Records:** The maintenance program must contain a recording system. Part of this system should be made up of inventories and schedules. In addition, the recording system should document what maintenance work was done, when, and by whom.

**Monitoring:** The monitoring functions in a maintenance program fall into two areas. First, the staff responsible for operating and/or maintaining equipment must monitor that equipment to ensure that appropriate checks and maintenance are done. Secondly, management must monitor the entire program to ensure that it is functioning in accordance with company policy.

**Scheduled Inspections and Maintenance:** All mobile equipment is to be inspected and maintained per the following Equipment Inspection Schedule as a minimum. Records of all inspections and maintenance are completed and maintained for review and approval.

Maintenance of equipment, release of lubrication fluids, etc., is performed only in approved areas. Spills and leaks from equipment will be cleaned up promptly.

## 7.10 Preventative Maintenance Procedure

### 7.10.1 Process

As equipment arrives at the site a determination is made if the equipment should be placed on a preventative maintenance schedule based on the type of equipment, calibration requirements, etc.

To ensure equipment is tracked and preventative maintenance work is performed on a timely basis the following process is used. The site management representative is responsible for ensuring the process is followed.

All records must be legible, readily retrievable, protected and stored to prevent damage, deterioration or loss.

### 7.10.2 Equipment Register

All equipment at a site that requires calibration or routine preventative maintenance is listed on the Equipment Register form by the designated maintenance representative for the site. The register contains information on equipment's:

- Description
- Make
- Model
- Serial Number
- Location
- Next Scheduled Preventative Maintenance Date

As appropriate equipment is added to a site's inventory it is added to the register as well as equipment that is removed permanently from the site is removed from the register.

Each week the Equipment Register is reviewed for scheduled preventative maintenance for equipment at the site. Each quarter a copy of the Equipment Register is sent to the appropriate management representative for the site.

### 7.10.3 Preventative Maintenance Records

Each piece of equipment on the Equipment Register is assigned a Preventative Maintenance Record form. This form contains information on the equipment including:

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- Equipment data
- Safety instructions for the item
- Description of preventative maintenance requirements for the equipment
- Preventative maintenance frequency and history

As scheduled preventative maintenance is performed on the equipment the maintenance record shall be completed.

The form is to be retained locally.

#### **7.10.4 Repair Procedures & Forms**

During preventative maintenance work or other requested repairs activity is tracked and documented by use of the following process.

This process ensures documented work performed, costs and management approval for material associated with the project activity.

All records must be legible, readily retrievable, protected and stored to prevent damage, deterioration or loss.

##### **7.10.4.1 Maintenance Request**

Maintenance requests are originated by the client or internal requestor contacting the designated maintenance representative for the site.

##### **7.10.4.2 Equipment Maintenance Log**

The designated maintenance representative takes information from the maintenance request and investigates the problem and documents work performed on the equipment maintenance log. Data contained on the equipment maintenance log includes:

- Maintenance Request input
- Corrective actions completed
- Manpower details
- Materials used or needed for repairs and cost(s)

*(Forms – Maintenance Log, Preventative Maintenance Schedule)*



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## 8.0 EMERGENCY RESPONSE

### 8.1 Emergency Response

#### Objectives

- To meet legal requirements to establish an Emergency Response Program (ERP) for an emergency that may require rescue or evacuation. The material in this document does not take precedence over applicable government legislation which all employees must follow.
- To consult with affected workers in establishing the ERP
- To subject it to regular review
- To ensure that it is current

#### Assignment of Responsibilities

##### *Health and Safety Representative*

- Develop, review and implement emergency response plans and procedures
- Ensure workers are aware of emergency plans through training
- Monitor effectiveness of emergency plans

##### *Managers and Supervisors*

- Responsible for ensuring necessary assets are made available for all emergency procedures
- The implementation of the emergency procedures or plans for their worksite

##### *Employees*

- Follow all contingency procedures or plans
- Through the Joint Health and Safety Committee reviewing and revising as required the emergency response plans

#### 8.1.1 Identifying Potential Emergencies

Each location will have an emergency response plan - depending on the hazards & site setup.

Mobile Energy Systems will review hazard assessment documents, the results of incident investigations and consideration of the potential for hazards around the worksite. Mobile Energy Systems will assess the potential for harm to people, property, equipment and the environment for each potential emergency situation.

The types of hazards to be addressed by the ERP need to include both work-related hazards and hazards which may be introduced onto the worksite by one of the following sources:

- Natural disasters
- Man-made events
- Technological failures

Once all potential emergencies have been identified plans for dealing with them are developed, communicated, and tested. These shall include, as a minimum:

- Plans for responding to an emergency that may require a need for rescue or evacuation is found
- Plans to address thermal exposure of heat and cold
- Plans to address workplace violence

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- Plans to address working alone
- Plans to address severe weather
- Plans to address medical emergencies
- Plans to address any other known or potential emergency

### 8.1.2 Evacuation

Contained within the Mobile Energy Systems Emergency Response Program are evacuation procedures for the worksite, establishment of safety zones and muster points where people being evacuated can gather. Individuals are assigned to assist mobility-impaired persons in the event of an emergency. Alarm systems to be used are established in the event of an emergency and they must suit the specific needs of the worksite.

### 8.1.3 Communication

Specific communication systems for use in the event of an emergency have been developed and emergency contact numbers posted where they are most likely to be needed. Mobile Energy Systems will include the names of local medical staff that could respond quickly in an emergency and will ensure these responders know that they are on the Mobile Energy Systems Emergency Contact List.

### 8.1.4 Training

All employees will be trained in what to do should a specific emergency situation occur. Training includes basic emergency response information (e.g. alarms, muster points, emergency exits) as part of the new worker safety orientation and staff assigned specific emergency response duties also are to receive specialized training, they need to ensure they are competent to perform their assigned tasks.

Employees assigned to be first aiders, fire fighters, floor wardens, etc., must know how to respond appropriately, and how to use any emergency equipment required. Those with less responsibility in the event of an emergency must at a minimum know how to respond to an alarm and whom to call for assistance. Everyone should know who will take charge and coordinate the evacuation, who will sound the alarm, and who is trained in first aid.

### 8.1.5 Emergency Equipment

Emergency equipment must be identified, available on site and maintained in good operating condition. Requirements will vary depending on Mobile Energy Systems worksite locations and the nature of the work performed and worker population. OHS legislation is referred to in order to determine minimum requirements for first aid kits, fire extinguishers, water hoses, emergency showers, emergency lighting, breathing apparatuses, ladders, stretchers, emergency communication equipment, etc.

Emergency equipment is to be in accessible locations and Mobile Energy Systems has established a regular schedule to service and inspect all emergency equipment including first aid and rescue equipment.

### 8.1.6 Disaster Services

If required, the Mobile Energy Systems Emergency Response Program may need to be reviewed with local emergency response agencies to ensure they have all the information they need to mount an effective response in the event of an emergency.

### 8.1.7 Drills

Drills must be held at least annually. Drills will be held for all types of emergencies and will include all work areas and all shifts. Records of both drills and actual emergencies will be kept and reviewed after each incident/exercise to identify areas where improvements can be made. (*Form – Record of Drill*)

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## 8.2 Emergency Response Procedure

### Purpose

Each Mobile Energy Systems location in Alberta shall have a written Emergency Response Plan, appropriate to the hazards of the workplace, in order to respond to an emergency that may require rescue or evacuation.

Each Emergency Response Plan shall be prepared to reflect all known probable emergency conditions which may arise from within the workplace and from adjacent workplaces.

### Emergency Response Planning, Issuing and Annual Review Guidelines

Emergency Procedures shall be issued and discussed with all new/transferred personnel upon arrival for assignment.

Emergency Response Plans shall be established, implemented, reviewed, maintained and updated annually in conjunction with:

- Client emergency services department requirements
- Health and safety representative
- Mobile Energy Systems management
- The requirement to ensure the plan is up to date to reflect current circumstances at the workplace.

The plan is to be reviewed before the job and when conditions warrant and should be used for routine and non-routine emergencies as well as changes in operation, and products or services which warrant new emergency situations.

### Evacuation Procedures Planning

The individual site evacuation procedure shall be appropriate to the risk and must be developed and implemented to:

- Notify staff, including the first aid attendant, of the nature and location of the emergency,
- Evacuate employees safely,
- Check and confirm the safe evacuation of all employees,
- Notify the fire department or other emergency responders, and
- Notify adjacent workplaces or residences which may be affected if the risk of exposure to a substance extends beyond the workplace. Notification of the public must be in conformity with the requirements of other jurisdictions, including provincial and municipal agencies.

### Written Emergency Response Plan

Mobile Energy Systems must conduct a risk assessment in any workplace in which a need to rescue or evacuate workers may arise. A workplace must have a written emergency plan, appropriate to the hazards of the workplace. The plan must address emergency conditions which may arise from within the workplace and from adjacent workplaces.

If the risk assessment shows a need for evacuation or rescue, appropriate written procedures must be developed and implemented. Written rescue and evacuation procedures are required for but not limited to:

- Work at high angles,
- Work in confined spaces or where there is a risk of entrapment,
- Work with hazardous substances,
- Underground work,

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- Work on or over water, and
- Workplaces where there are persons who require physical assistance to be moved.

Procedures for potential emergencies shall be contained within the Emergency Response Plan. Examples include:

- Bomb Threat
- Chemical Fire
- Equipment Upset
- Explosion
- Extreme Temperatures
- Fire
- Forest Fires
- Gas Leaks/Chemical Spills
- Medical Emergencies
- Power Outage
- Suspicious Package
- Suspicious Person(s)
- Tornadoes
- Vehicle Collisions/Accidents
- Worker Rescue at Heights
- Workplace Violence

### 8.2.1 Bomb Threat

When confronted with a caller threatening to detonate a bomb:

- Do not panic.
- Listen politely – avoid interrupting the caller.
- Ask where the bomb is located.
- Ask when the bomb is set to explode.
- Ask what the bomb looks like.
- Ask who the caller is.
- Ask why your company was targeted.
- Alert the Health and Safety Representative and Fire Warden(s).
- Evacuate the building.
- Call 911 from a cell phone outside. Speak clearly and report:
  - We have just received a bomb threat.
  - Your name and the Mobile Energy Systems.
  - The address of the worksite.
  - An accurate and thorough description of the emergency.
  - Describe the 5 w's from above.

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### 8.2.2 Chemical Fire

Reference: IRP # 14, Non Water Based Drilling and Completions/Well Servicing Fluids and Mobile Energy Systems Policy and Procedures.

Precautions must be used at all time to prevent fires. The following is a list of some guidelines:

- Gasoline, volatile solvents or any other flammable substance must be stored in containers that are clearly labeled, approved for their contents and located in a safe place away from any source of open flame.
- Flammable liquids containers must be electrically bonded when liquids are being transferred from one to another.
- Any portable container which is being used, or has been used, for storage of a flammable agent must never be left exposed to the direct rays of the sun.
- The fuel tanks of gasoline engines must be filled away from work areas and only when the engines are turned off
- Approved safety cans and proper grounding techniques must be used when the tank is not filled directly from the storage container or other source of supply.
- Access to all exits, fire and safety equipment must be kept clear of obstructions at all times.

In the event of a fire, the primary consideration must be for the Safety of All Personnel. The following procedures are recommended practices to be followed only if they do not represent a risk to personnel safety:

If the fire is in a storage tank or diked area:

- Notify your supervisor, who in turn will initiate their Emergency Response Plan

If the fire is in the tank truck:

- Notify the operator immediately, who in turn will initiate their Emergency Response Plan.

If the following can be done without risk to personal safety:

- Close the load line valve
- Disconnect the hose(s) from the load line
- If the fire is small, an attempt to extinguish it may be made by using the available equipment on the lease. However, all steps must be taken to prevent injury and further damage to equipment prior to attempting to extinguish the fire.
- Move the tank truck from the lease if safe to do so
- Stand back at a safe distance and wait for assistance

### 8.2.3 Equipment Upset

In the event of an equipment upset (rollover, trapped equipment, catastrophic failure):

- Call for immediate assistance by phone or radio.
- Ensure the machine is stable and not at risk of further movement.
- De-energize the equipment including all attachments:
  - Lower boom, blade, attachments, etc.
  - Release the load, or
  - Change the load position.
- Assist any workers with safe egress from the equipment if it is safe to do so.

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- If the conditions do not permit for safe egress, wait for appropriate emergency response personnel.
- Keep area clear and warn others in the immediate area.

#### 8.2.4 Explosions

- Get down on the floor, take shelter under tables or desks, and protect your face and head against flying glass and debris.
- Once it is safe to do so, evacuate the premises via the nearest exit and proceed to the nearest Muster Point.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

#### 8.2.5 Extreme Temperatures

Both very cold and very hot temperatures could be dangerous to your health. Excessive exposure to heat is referred to as heat stress and excessive exposure to cold is referred to as cold stress.

- In a very hot environment, the most serious concern is heat stroke. In absence of immediate medical attention, heat stroke could be fatal. Heat stroke fatalities do occur every summer. Heat exhaustion, and fainting (syncope) are less serious types of illnesses which are not fatal but interfere with a person's ability to work.
- At very cold temperatures, the most serious concern is the risk of hypothermia or dangerous overcooling of the body. Another serious effect of cold exposure is frostbite or freezing of the exposed extremities such as fingers, toes, nose and ear lobes. Hypothermia could be fatal in absence of immediate medical attention.

##### Heat Stroke

Victims are unable to notice the symptoms, and therefore, their survival depends on co-workers ability to identify symptoms and to seek medical help.

While symptoms can vary from person to person, the warning signs of heat stroke can include:

- Complaints of sudden and severe fatigue, nausea, dizziness, light-headedness, and profuse and prolonged sweating.
- If a worker appears to be disorientated or confused (including euphoria), or has unaccountable irritability, malaise or flu-like symptoms, the drivers should be moved to a cool location and seek medical advice.
- Workers should be moved to a shelter and seek medical advice when appropriate.

##### Hypothermia

Winter conditions can become severe or dangerous very quickly, sometimes with little or no warning. High wind chills, heavy snowfall, freezing rain, blizzards and bitterly cold temperatures, all pose a hazard to those venturing outside or traveling. The following general precautions outline how you can minimize the effects of winter weather and prepare in advance for severe weather conditions.

- Dress to Suit the Weather: Thin layers of loose fitting clothing will trap body heat while aiding air circulation. Outer clothing should be hooded, tightly woven and repel water. Mittens are warmer than gloves. Because most body heat is lost through the head, it is important to wear a hat. If it is extremely cold cover your mouth to protect your lungs from the cold air.
- Watch for signs of hypothermia which is particularly threatening to the very young and elderly. Hypothermia is an internal body temperature drop such that the body processes slow and they can no longer generate as much heat as is being lost. It is symptomized by confusion, slurred speech, stiff muscles or uncontrollable shivering. If symptoms occur get medical assistance immediately. Hypothermia can be fatal.

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- Check the weather forecast before traveling or outdoor activities. Pay particular attention to wind chill, which can create dangerous cold outdoor conditions.

Winterize your home and vehicle before the cold weather arrives. Prepare an emergency pack for your home and vehicle and ensure your home heating system is in good working order. Insulate your home to avoid cold air leaks and minimize heating costs.

Pace your outdoor activity: Be alert for signs of frostbite. Avoid strenuous activity in extremely cold temperatures because the heart must work harder to pump blood through constricted vessels in arms and legs.

#### 8.2.6 Fire

- Warn others in the immediate area. Notify the appropriate emergency response personnel by phone or radio and pull the nearest fire alarm if present.
- If nearby staff have been trained, and it is safe to do so, fight the fire using a portable fire extinguisher. Remember, if in doubt get out.
- Evacuate the premises via the nearest exit and proceed to the nearest Emergency Muster Point.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

#### 8.2.7 Gas Leaks/Chemical Spills

Upon smelling or noticing a gas leak or unusual vapours, or a chemical spill:

- Pull fire alarm (if present) or sound warning and evacuate the premises via the nearest exit
- Proceed to the Emergency Muster Point
- Contact local emergency response personnel by phone or radio
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

If employees are required to control a release of a hazardous substance, to perform clean-up of a spill, or to carry out testing before re-entry, Mobile Energy Systems shall provide:

- Adequate written safe work procedures and documented training.
- Appropriate personal protective equipment which is readily available to employees and is adequately maintained, and
- Material or equipment necessary for the control and disposal of the hazardous substance.

#### 8.2.8 Medical Emergencies

- Call for assistance by phone or radio. Give the exact location and details of the medical emergency.
- If qualified, provide basic first aid, and keep the person comfortable.
- Do not move the person.
- Do not leave him/her unattended.
- Arrange for emergency medical transportation based on the medical planning portion of the site's Emergency Response Plan.

#### 8.2.9 Power Outage

- If the power is out for the entire building, emergency lighting will activate.
- Call the manager nearest you.
- Management will contact the power company and report a power outage and get an update on when the power will be restored to the area.

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- Staff will remain in the building for a period of one hour.
- If power is not restored after one hour, management will advise if workers are to be sent home for the day.

#### 8.2.10 Suspicious Package

Recognition of a suspicious package:

- Package is unexpected, mislabeled or from an unknown source.
- Discoloured.
- Crystals.
- Strange odours.
- Oily stains.
- Powder or powder like residue.
- Unusual size, weight or shape.
- Visible wiring or batteries.
- Person delivering package runs away.

Do not attempt to remove or manipulate the package in anyway.

- Call 911 and report a suspicious package to police.
  - Provide some details of the package (location, envelope, bag, box, colour, etc.)
- Evacuate the area in a safe but timely manner.
- Report to management, health and safety representative and/or fire warden(s).
- If contact was made with a substance from the package, wash applicable areas thoroughly and seek medical attention.

#### 8.2.11 Suspicious Person(s)

Alert management of the situation (who-description of person if name unknown, what, where, how many person(s)). Health and safety representative also be notified of the scenario.

- Employee is to act normal and as to not raise concern to the person identified as suspicious
- Report to supervision, safety advisor, and to emergency persons as soon as possible
- Write down a description of the person if the name is unknown
- Employee is to go to a safe area if possible where there are locks on doors (i.e. bathroom or vehicle)
- Wait until emergency services are in the area and provide statement
- Complete internal paperwork

#### 8.2.12 Tornadoes

Tornadoes frequently occur throughout the Prairie Provinces. They have the capability to destroy buildings and equipment and cause serious or fatal injuries. By following certain procedures, the danger can be minimized.

All weather-related cases must be taken seriously and the necessary precautions taken in order to be proactive and minimize the risk of serious injury.

Keep informed of the possibility of severe weather and learn what to do if the situation arises. If a severe weather watch has been issued for your area, stay alert and listen to local broadcast outlets for severe weather warnings.

If a thunderstorm approaches:



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- Get away from open areas, such as fields and golf courses, immediately.
- If you are outdoors when a thunderstorm approaches and you feel static electricity around your body, you may be in danger of being struck by lightning. Kneel on the ground immediately, with feet together, place your hands on your knees and bend forward.
- Watch out for flash floods.

A severe thunderstorm is the driving force behind a tornado.

- Hot, humid weather combined with a cold front could be a sign that a tornado is brewing, and a funnel cloud hanging from a dark cloud may be visible before the tornado actually occurs.
- A tornado may be accompanied by lightning, high winds, and hail.
- The weather office issues, and radio and television repeat weather watches and warnings.
- Stay tuned to your local TV and radio stations for updated storm information especially when weather conditions exist for generating a tornado.

Tornadoes often accompany severe thunderstorms and are only one of many thunderstorm hazards. Other includes:

<b>Lightning</b>	Kills and injures hundreds and starts fires
<b>Winds</b>	Very strong, gusty winds can cause great damage
<b>Rain</b>	Heavy downpours may result in flash floods
<b>Hail</b>	Not a killer but can be very damaging

A **Watch** is an advisory only. Nothing may happen but a watch could develop into a warning. Stay alert! Listen to your radio.

A **Warning** means that the event is imminent. Take precautions and listen to your radio.

If a tornado is spotted or reported through various media channels, all employees have the responsibility to report it immediately to their manager or health and safety representative.

If the tornado is in the vicinity of the company, the following procedures apply. If there is time to evacuate the building, then do so under the direction of a manager or Foreman representative depending on the location of the hazard. Evacuation could include removal of staff from the entire area.

If there is no time to leave the building, all employees must use the following guidelines:

- Stay away from windows, doors, and outside walls.
- Stay away from mobile machinery; an automobile will not protect you.
- Stay tuned to radio / television. Select the station with the best continuous information.
- If a tornado is upon us, hold onto something solid that is fastened down and is not likely to fly away.
- If caught outside, lie face down in a ditch, culvert or any other low lying area. Try to stay away from loose objects, if possible, as they will get picked up and sent around our surrounding area.

After the tornado has passed, and depending on the condition of the facility afterwards, check and see if anyone needs help. If they do, provide first aid or find a staff member who has first aid and inform him or her of the situation.

If there are no injuries, proceed to the gathering point and wait for further instructions.

Tornados are very unpredictable and can cause untold damage to people and property. The best way to minimize the danger is to be prepared through an action plan.

Find an area that is secure, avoid large buildings; seek out inner hallways, washroom, closets, etc. Stay away from flying glass, debris, etc.

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If caught outdoors and you cannot reach your designated shelter, lie flat in a ditch, excavation or culvert. If possible, lie flat, holding onto the base of a small tree, bush or shrubbery to avoid being lifted or blown away.

If caught while driving, drive away from the funnel at a right angle or to its direction of travel (if possible). If you cannot escape the path of the funnel, get out of your vehicle immediately and seek shelter in a ditch or ravine, keeping its slope between you and the funnel.

If caught away from home in a built up area, seek shelter in a sturdy building. Go to an interior hallway or washroom on lower floor, stay away windows, doors and outside walls. Protect your head. Avoid buildings with large span roofs such as malls or supermarkets, etc.

The dangers associated with a disaster are not over once the tornado has passed.

- Protect yourself and your family:
- Listen to your radio for information and follow instructions.
- Do not visit the disaster area. You may hinder rescue efforts.
- Avoid using the telephone except for emergencies.
- Monitor local media reports and municipal web pages for information on when it is safe to return to your home. They can also provide other post-incident advice and assistance.
- Drive carefully and watch for debris, dangling or broken wires and damaged bridges and roads. Report problems to police or fire departments.
- Wait until you are advised that it is safe to enter buildings that may have been structurally damaged, and then proceed with caution.
- Use only battery-powered lanterns or flashlights to examine your home for damage, which may contain flammable items. Do not use candles or matches.
- Check for leaking gas pipes

If you smell gas:

- immediately open windows and doors,
- turn off the main gas valve,
- leave the building
- notify the gas company from another location, as well as the
- police and fire department.
- Do not re-enter the building unless you are told it is safe to do so.
- If electrical appliances are wet (and you are NOT wet or standing in water) turn off the main power switch. Then unplug the wet appliances and have a qualified technician inspect them. With all the wet appliances unplugged, turn on the main power switch. If any fuses blow when power is restored, turn off the main power switch again and have your building checked by a qualified electrician or call your utility company.
- Follow the instructions of your local health unit concerning the use of food and water supplies.
- Check to see that sewage lines are intact before flushing toilets.
- Report damaged water, sewage, and gas lines to the proper authorities.

The emotional impacts of disasters on those affected are well known. Pay attention to your feelings and those of your family members. Your regional health authority can provide assistance in coping with trauma resulting from a disaster.

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**Tip:** Maintain an emergency kit containing food, clothing, blankets, a first aid kit and medication, a battery-powered radio with fresh batteries, a flashlight or lantern and tools for emergency repair jobs. Check them often and keep them in your pre-arranged shelter area. Carry a similar kit in your truck.

### 8.2.13 Vehicle Collision

Involvement in a highway or secondary road collision or witness to a collision is high risk in our business because we are frequently on the roads. You can lessen the risk of being involved in a collision by following the procedures, rules and regulations that are set out by this company and by the government.

#### DO:

- Stop - Failure to stop is a criminal offence
- Call for assistance by phone or radio. (follow their instructions)
- Give the exact location and details
- Give first aid to injured (if you are trained)
- Secure the scene (turn on hazard lights, put reflective triangles in place, direct traffic)
- Assess the Situation
  - ✓ Is there a fire?
  - ✓ Is there a spill or leak?
  - ✓ What is at risk, people, property or the environment?
  - ✓ What should be done? (Is an evacuation necessary?)
  - ✓ Is diking necessary?
  - ✓ What resources (human and equipment) are required and which are readily available?
  - ✓ What can be done right away?
- Take pictures when able – for investigation: position of vehicles, landscape, etc.
- Hand out witness cards to witnesses (collect them when they are done filling them out)

#### DO NOT:

- Leave the scene (until directed to do so by your supervisor or the RCMP)
- Move injured persons (unless further danger is imminent)
- Discuss the incident (except with police officers or a company representative)
- Leave your vehicle unguarded
- Move any of the vehicles involved until the police arrive.

### 8.2.14 Worker Rescue at Heights

Alert Supervision of the situation (who, what, where how many). Health and safety representative to be notified immediately.

- Assemble a Rescue Team and proceed to the point of concern with safety equipment (i.e. JLG, step/extension ladders).
- If the victim(s) are at a height below 10 feet use a stepladder and place it under the victim's feet. Another rescue team member will remove the victim's lanyard from the D-ring and slowly help the victim(s) to ground level. Once at ground level, EMT will then take over.
- If the height is greater than 10 feet and a JLG is available, the basket will be placed underneath the victim, lifted up and the lanyard removed. Bring victim down to ground level and proceed with EMT direction.

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- Use a ladder, hook rescue rope to D-Ring, use pulley system to pull person up to / or descend to nearest landing.

**NOTE: TREAT ALL VICTIMS AS IF THEY MAY HAVE SPINE / INTERNAL INJURIES AND / OR MAY BE SUFFERING FROM SUSPENSION TRAUMA**

### 8.2.15 Workplace Violence

- Notify security or 911 immediately by phone or radio and report the occurrence.
- Do NOT attempt to physically intervene.
- Keep a safe distance from the person.
- Protect yourself first at all costs.
- Report the event to your Supervisor and Health and Safety Representative
- Document the event.

## 8.3 Emergency Response Equipment

### 8.3.1 Identification and Location of Emergency Equipment

Each site Emergency Response Plan shall identify, list the locations of and provide operational procedures for types of emergency equipment. For off-site locations, available emergency equipment should be identified and reviewed with workers prior to commencing work activities. Examples include:

- Emergency lighting, exit doors, dampers and fire stop flaps.
- First aid kits located throughout the facility and in vehicles.
- Portable fire extinguishers being located throughout the facility and clearly marked.
- Only authorized and trained personnel will operate emergency equipment.

### 8.3.2 Inspection & Maintenance Records

Maintenance records must be kept, including but not limited to the name of manufacturer, the type of equipment, the date put into service, when and for what purpose the equipment has been used, the date of the last inspection and name of the inspecting person, any damage suffered, and the date and nature of any of maintenance on emergency response equipment.

Ropes and associated equipment must be inspected visually and physically by qualified employees after each use for rescue, evacuation or training purposes.

Facilities will be inspected monthly and a member of the Joint Health and Safety Committee (JHSC) is to participate in all inspections.

The Mobile Energy Systems designated representative will perform and maintain the Mobile Energy Systems Emergency Inspection Checklist Form on a monthly basis. The checklist shall be maintained for retention in active files for two years and in on site archives for seven years.

## 8.4 Media Response Plan

Mobile Energy Systems employees must not be interviewed by anyone unless the Legal Department or Mobile Energy Systems management has given prior approval. In most cases the Legal Department will have an attorney present for such interviews.

Note: If after Mobile Energy Systems personnel have received approval for an interview and another party's attorney appears unannounced, you should politely adjourn the interview until the Mobile Energy Systems Legal Department

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can be contacted. Personnel must not give any work-related interviews, affidavits, written or recorded statements, or depositions without the express approval from the Mobile Energy Systems Legal Department.

In the case of interviews of Mobile Energy Systems employees by non-attorneys, (law enforcement, government officials, media, etc.) you must inform the Legal Department before the interview. If the interview is taped or videotaped, you must request a copy of the tape. If the interview is reduced to writing, you must ask for a copy of any notes or statements taken. This procedure is to avoid information being misrepresented.

All media requests should be referred to the Mobile Energy Systems Senior Management. Unless requested to do so by the Legal Department, other company personnel are not to give interviews or make statements to the media. Management prefers that families of personnel involved in an incident receive initial notification from a Mobile Energy Systems representative and not the media.

## 8.5 Training

Workers are provided training on emergency response. Requirements include:

- All workers must be given adequate instruction in the fire prevention and emergency evacuation procedures applicable to their workplace.
- At least once each year emergency drills must be held to ensure awareness and effectiveness of emergency exit routes and procedures, and a record of the drills must be kept.
- Workers designated to provide rescue or evacuation services must be adequately trained.
- The designated site representative shall provide the Emergency Response Plan orientation to all new/transferred personnel before they begin work.
- All personnel shall receive a review or update of orientation at least annually, or whenever any new/revised information is to be provided.
- The New Employee Orientation Check List shall be completed after orientation and the record maintained in the individual's training records.
- Mobile Energy Systems management shall ensure that contractors/consultants working in areas under the supervision of Mobile Energy Systems also receive the Emergency Response Plan orientation upon arrival to the area.
- A list of trained staff responders shall be posted and maintained indicating their name, response function, their work location and what type of equipment they have been trained for.

## 8.6 Who to Call in the Event of an Emergency

Mobile Energy Systems shall ensure each Emergency Response Plan lists the location and how to use emergency facilities for each worksite. For off-site locations, outside services that can provide assistance in the event of an emergency will be identified and reviewed with workers prior to commencing work activities.

A list shall be posted in a conspicuous area showing local emergency facilities and how to contact. Examples include:

- 911 (Initial Responder for All Emergencies)
- The designated on duty COMPANY Emergency Coordinator name and phone number.
- Client Emergency Response Department (Initial Responder for All Emergencies If Applicable)
- RCMP/Police
- Local Hospital (for site work being conducted)
- Poison Center (Poison Response)

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## 8.7 Fire Protection & Response

Mobile Energy Systems shall ensure each Emergency Response Plan provides fire protection and response planning within each site Emergency Response Plan and is utilized during all phases of work. As a minimum, all shall include the following:

### 8.7.1 Protection

- Smoking is not permitted except in designated “SMOKING” areas.
- Facilities shall be designed and maintained in accordance with local fire code and regulations.
- Portable fire extinguishers shall be stationed, inspected and maintained in accordance with local fire codes and regulations. Mobile Energy Systems personnel shall be trained in their use.
- Flammable and combustible liquids shall be properly stored.
- Employees shall report all fire safety issues to their immediate supervisor.
- Facilities shall be inspected by use of the Mobile Energy Systems Worksite Inspection Checklist.

### 8.7.2 Response

In the event of a fire, personnel working in facility will adhere to the following procedure for their work area:

- Warn others in the immediate area. Notify the appropriate emergency response personnel by phone or radio and pull the nearest fire alarm if present.
- If nearby staff have been trained, and it is safe to do so, fight the fire using a portable fire extinguisher. Remember, if in doubt get out.
- Evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Roads are designated as fire lanes. Vehicles can stop there for unloading, but no parking will be allowed.

## 8.8 Alarm & Emergency Communication

Each Emergency Response Plan for Mobile Energy Systems shall contain methods to address alarms and communications in case of an emergency. For off-site locations, the method of emergency notification should be identified and reviewed with workers prior to commencing work activities.

### 8.8.1 Alarm System

Each Emergency Response plan will describe how to activate an alarm and what to do after either activating or hearing an alarm.

Personnel responding to any alarm shall avoid complacency. Every alarm should be treated as an actual incident until proven otherwise. Treating and responding to alarms as a routine happening can result in injuries, fatalities and destruction of property.

### 8.8.2 Communications

Mobile Energy Systems responders and security use telephones, cell phones and radios in conjunction with emergency response.

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## **8.9 Rescue and Evacuation Procedures**

### **8.9.1 Procedures for Rescue**

Each site Emergency Response Plans shall address who performs rescue services when required. It is the position of Mobile Energy Systems that all rescue duties are performed by client emergency responders or local governmental responders when on their location. For off-site locations, evacuation procedures and methods of rescue should be identified and reviewed with workers prior to commencing work activities.

At least one member of a rescue team must be a first aid attendant trained to immobilize an injured employee.

Effective communications must be maintained between the employees engaged in rescue or evacuation and support persons.

### **8.9.2 Emergency Evacuation Procedures**

This site evacuation procedure is appropriate to the risk and must be developed and implemented to:

- notify workers, including the first aid attendant, of the nature and location of the emergency,
- evacuate workers safely,
- check and confirm the safe evacuation of all workers,
- notify the fire department or other emergency responders, and
- notify adjacent workplaces or residences which may be affected if the risk of exposure to a substance extends beyond the workplace.

### **8.9.3 Preparation for Evacuation**

Each site Emergency Response Plan shall contain a procedure for evacuation if required. The designated Emergency Coordinator will maintain an active list of all Mobile Energy Systems and contract emergency responders.

### **8.9.4 Essential Services Management**

Staff designated to remain in the facility to shut down or supervise essential operations or equipment will be specifically trained and authorized by management to perform their duties

### **8.9.5 Emergency Response Drills**

At least once each year emergency drills must be held to ensure awareness and effectiveness of emergency exit routes and procedures, and a record of the drills must be kept. Before conducting an evacuation drill a pre-drill assessment of the evacuation routes and assembly points shall be conducted. The pre-drill assessment is intended to verify that all egress components (stairs, doors, etc.) are in proper order and that occupants can use them safely. Emergency response drills must be documented and will note any deficiencies identified while the drill was being completed and any corrective actions that will need to be implemented as a response to identified deficiencies.

Emergency response drills should cover a different scenario each year in order to educate employees on the emergency scenarios identified as part of the Mobile Energy Systems emergency response plan.

### **8.9.6 Coordination within a Facility**

Emergency training and drills should also be coordinated within a Mobile Energy Systems facility so that key staff are involved in the planning process and are aware of their responsibilities in an emergency as well as during the drill.

Facility management also needs to be informed of the potential for the interruption in productivity and business operations. Alternatives for the continuity of critical operations need to be considered.



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### 8.9.7 Emergency Evacuation Notification and Routes

In the event of an emergency occurring within or affecting the worksite, the Emergency Coordinator makes the following decisions and ensures the appropriate key steps are taken:

- Advise all personnel of the emergency.
- Activate the emergency notification sequence to alert the appropriate responders and initiate emergency notification within the building.
- Evacuate all persons to the identified assembly area and account for everyone including visitors and clients.

All personnel will proceed to the primary safe area immediately located at the identified muster point for their location.

A copy of escape routes shall be posted in all offices, at all alarm stations and at all exits.

### 8.9.8 Sweep Check by Designated Responders

- Mobile Energy Systems trained responders will establish a pattern that will permit covering the area in the shortest time, with a minimum of backtracking.
- When the evacuation alarm rings, stop work immediately, and conduct a sweep of the area. Ask everyone to leave the premises immediately and proceed to the identified emergency assembly area for their location.
- If smoke or flame is encountered, leave that section immediately, finish the sweep and evacuate the building by activating fire alarm pull stations. Remember, if in doubt get out.
- If anyone refuses to leave, note their name and location, and advise the client emergency services personnel.
- Meet the client emergency services personnel and advise them of your sweep or an area of smoke or flame that you were unable to check. Assist with head count and evacuation if required.
- Ensure that everyone stays at the emergency assembly area until the Emergency Coordinator has given an all clear to re-enter the building.
- In the event of inclement weather, the client will make arrangements to have buses either as temporary shelter or to transport personnel to another location.

### 8.9.9 Emergency or Drill Evaluation

Following an actual emergency or drill a response review shall be conducted and documented by the Emergency Coordinator and lessons learned shared with the appropriate responders and staff using the Emergency Response Drill Form.

### 8.10 Emergency Response Program Management

The Mobile Energy Systems manager will have the overall accountability for administering the Emergency Response Plan. For the purpose of this Emergency Response Plan guidance the Emergency Coordinator will be designated by the Mobile Energy Systems manager. His/her alternate will be the Mobile Energy Systems Site Safety Supervisor or otherwise designated by the manager.

Employees performing rescue or evacuation must wear personal protective clothing and equipment appropriate to the hazards likely to be encountered.

#### 8.10.1 Duties

**Emergency Coordinator - The Emergency Coordinator ensures that:**

- Evacuation drills are conducted on an annual basis.
- Inspections of facilities are performed monthly.



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- All necessary repairs of components for evacuation paths are completed.
- Plans for the modification of any part of an evacuation path are reviewed.
- An up to date list of Fire Wardens is maintained.
- Radios and reflective vests and other response equipment are available.

**During an evacuation or evacuation exercise, the Emergency Coordinator:**

- Coordinates activities in accordance with either local authorities or the client Security and ERT as required.
- Coordinates Fire Wardens and informs them the nature of the emergency via handheld radios.

**Following an evacuation or evacuation exercise, the Emergency Coordinator:**

- Notifies Fire Wardens that it is safe to re-enter the building.
- Prepares a report following an evacuation (actual or drill).
- Reports to management for follow up or corrective actions.

**Health and Safety Representative**

- Assist the Emergency Coordinator when requested.

**Fire Wardens**

- Be equipped with radios and reflective vests.
- Be familiar with exits and muster stations for their responsible area.
- Direct residents safely out of the building to the designated muster station or to an alternate location.
- Sweep their effected area, ensuring that the alarms are properly functioning and that residents evacuate safely.
- Complete a head count and reconcile the evacuees with the daily housing report at the assigned muster station or alternate location.
- Radio unaccounted for personnel to Security.
- Notify personnel that they may re-enter the building when permission has been given by the appropriate authorities.

**Residents, Contractors & Visitors**

- All employees, users, contractors and visitors will follow the instructions of the Fire Wardens, Security, ERT, Safety Personnel, managers and supervisors when asked to evacuate the building.
- Know the two safest and most direct evacuation routes from their work area(s) and muster area of site.

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## 8.11 Emergency Response Plan

EMERGENCY CONTACT LIST To Be Posted at All Work Locations						
Prepared by:		Date of List:				
EMERGENCY RESPONSE CONTACTS						
Fire	911	Local:				
Police	911	Local:				
Ambulance	911	Local:				
Disaster Services	1-800-661-0408 24 Hours (Toll-Free)					
Poison Control	1-800-332-1414					
Forest Fire	310-FIRE					
WHMIS Hotline	1-800-387-5710					
COMPANY CONTACTS						
President	PRESIDENT					
PROVINCIAL/FEDERAL GOVERNMENT CONTACTS						
WCB	FAX: 1-800-661-1993 (in Alberta) Employer's Report of Injury form by fax: <a href="https://www.wcb.ab.ca/assets/pdfs/employers/c040.pdf">https://www.wcb.ab.ca/assets/pdfs/employers/c040.pdf</a> Employer's Handbook can be found here: <a href="https://www.wcb.ab.ca/assets/pdfs/employers/employer_handbook.pdf">https://www.wcb.ab.ca/assets/pdfs/employers/employer_handbook.pdf</a>					
Environment	1.800.222.6514					
OTHER CONTACTS						
Power Company						
Telephone Company						
Gas Company						
CLIENT SAFETY CONTACT						
Mobile Energy Systems	COMPANY #	CONTACT	CONTACT #			
LOCAL EMERGENCY NUMBERS BY WORKSITE COMMUNITY						
AREA	POLICE DISPATCH	POLICE EMERGENCY	FIRE	AMBULANCE	HOSPITAL	MEDICAL AID

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**You must change the areas in yellow to customize the ERP Information for the SPECIFIC WORK SITE**

SITE SPECIFIC ERP INFORMATION		
Location		Date of Preparation:
Prepared by:	Title:	Contact #:

<b>POTENTIAL EMERGENCIES</b>  (BASED ON PRE-JOB HAZARD ASSESSMENT)	The following are identified potential emergencies: <ul style="list-style-type: none"> <li></li> </ul>	
<b>EMERGENCY PROCEDURES</b>	List all Emergency Procedures for the identified Potential Emergencies listed above	
<b>LOCATION OF EMERGENCY EQUIPMENT</b>	Emergency equipment is located at: <ul style="list-style-type: none"> <li>Fire Alarm – List</li> <li>Fire Extinguisher – List</li> <li>Fire Hose – List</li> </ul>	
<b>WORKERS TRAINED IN THE USE OF EMERGENCY EQUIPMENT</b>	1. Worker 1 2. Worker 2 3. Worker 3 4. Worker 4	
<b>EMERGENCY RESPONSE TRAINING REQUIREMENTS</b>	Type of Training <ul style="list-style-type: none"> <li>Use of fire extinguishers</li> <li>Practice fire drills</li> </ul>	Frequency <ul style="list-style-type: none"> <li>Orientation and annually</li> <li>At the call of site management</li> </ul>
<b>LOCATION AND USE OF EMERGENCY FACILITIES</b>	The nearest emergency services are located at: <ul style="list-style-type: none"> <li>List facilities</li> </ul>	

**HEALTH & SAFETY MANAGEMENT SYSTEM**

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<b>FIRE PROTECTION REQUIREMENTS</b>	<ul style="list-style-type: none"><li>List all site fire protection requirements.</li></ul>
<b>ALARM AND EMERGENCY COMMUNICATION REQUIREMENTS</b>	<p>Pulling the fire alarm automatically alerts the fire department and initiates an alarm within the building</p> <p>The fire alarm signal is (describe sound and pattern)</p>
<b>FIRST AID</b>	<p>First aid supplies are located at:</p> <ul style="list-style-type: none"><li>List</li></ul> <p>First Aiders are:</p> <ul style="list-style-type: none"><li>List all names</li></ul> <p>Transportation for ill or injured workers is by (describe). The contact number or radio channel is (describe).</p>
<b>PROCEDURES FOR RESCUE AND EVACUATION</b>	<p><b>In case of fire:</b></p> <ul style="list-style-type: none"><li>Pull/Sound the fire alarm</li><li>Evacuate all persons to a safe point in the staff parking lot and account for everyone including visitors and clients</li><li>Assist ill or injured workers to evacuate the building</li><li>Call emergency response personnel to arrange for transportation of ill or injured workers to the nearest health care facility if required.</li><li>Provide first aid to injured workers if required</li></ul>
<b>DESIGNATED RESCUE AND EVACUATION WORKERS</b>	<p>The following workers are trained in rescue and evacuation (or describe client rescue organization):</p> <ol style="list-style-type: none"><li></li><li></li><li></li><li></li></ol>

Signed: \_\_\_\_\_

Completed on: \_\_\_\_/\_\_\_\_/\_\_\_\_

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## 9.0 INCIDENT INVESTIGATION & REPORTING

### Objectives

- To have effective procedures for reporting and evaluating/investigating incidents and non-conformances in order to prevent further occurrences.
- The material in this document does not take precedence over applicable government legislation which all employees must follow.

### Assignment of Responsibilities

#### *Health and Safety Representative*

- Ensures investigations are conducted and assists in identifying corrective actions.
- Ensures review of all collisions in company vehicles.
- Ensures review of all 'reportable collisions' are completed in full.

#### *Managers and Supervisors*

- Investigates (or assists in) incident investigations
- Corrects non-conformances

#### *JHSC Member or HS Representative*

- Participate in the overall investigation procedure
- Ensure actionable items are discussed within the committee meeting
- Verify items are addressed and follow-up on items in meeting to verify they are acceptably mitigating a recurrence.

#### *Employees*

Immediately report any injury, near miss, work refusal, job related illness, collision, spill, work refusal, near miss, or damage to any property to their immediate supervisor.

If their immediate supervisor is not available, the worker is then to immediately notify the project manager.

When an employee is involved in a work related incident or is aware of a condition that may cause one the employee must report the incident as soon as possible to Mobile Energy Systems Incidents include any near miss, injury, job related illness, spill or damage to any property to their immediate supervisor.

Employees who could be first responders will be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

### 9.1 Incident Reporting Policy Statement

Mobile Energy Systems requires the immediate (as promptly as possible) verbal reporting of all collisions, incidents, workplace-related illness, work refusals, and near misses. The immediate supervisor is initially notified and then the designated health and safety representative shall be contacted. Written notification shall follow verbal notification. Supervisors are required to complete the Mobile Energy Systems Incident Report Form and the Incident Investigation Report Form and utilize the Mobile Energy Systems Witness Statement Form for the workers and witnesses to the incident. All workers will be trained to these standards through employee orientations (Duty to Report) and periodic refreshers will be included in team or safety meetings to reinforce the importance of incident reporting. Failure to

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report incidents, hazardous work conditions, occupational illnesses, work refusal, or near misses shall result in disciplinary action.

## 9.2 Incident Investigation Policy Statement and Procedures

Mobile Energy Systems will investigate any recordable incidents, accidents, incidents, near misses, injuries, work refusals, and occupational illnesses as required.

An incident investigation must include the following.

- The timeframe for investigations. Investigations should begin as soon as possible, after the injured have been cared for, and all of the potential hazards are removed. Ideally, investigations should be complete within 24 hours of the incident occurring.
- Who will be responsible for leading the investigation and the training required. This will fall to personnel in management and supervisory roles.
  - There is a requirement for the investigation team to have undergone formal investigations training; any supervisor or manager delegated to perform an investigation will be suitably trained in investigation techniques.
- A requirement for participation from all levels of employment. You should include managers, supervisors, Health and Safety Committee members, witnesses to the incident, and other workers who might bring specialized skills or knowledge to the investigation process.
- Basic steps for conducting the investigation:
  - Immediate response to the accident/incident:
    - Eliminate immediate hazards to ensure no one else is injured,
    - Provide emergency care to the injured.
    - Secure the accident site – ensure you do not disturb the evidence. Evidence must be protected and not disturbed as required by legislation. Leaving the site as is will allow for an effective incident investigation.
    - Notify the proper governing authorities – OH&S, WCB, etc.
  - Gather all the pertinent information:
    - Take notes, including:
      - Dates and times,
      - Names and addresses,
      - Information from interviews,
      - Observations,
      - Actions taken in response to the incident,
      - Description of the site and environmental conditions,
      - Review any pertinent documentation – meetings, hazard assessments, policies, legislation, etc.
      - Reference to pictures, if taken,
      - Sketches/diagrams, and
      - Information about evidence gathered.
  - A requirement to identify contributing factors, direct causes, indirect causes, and root causes:

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- **Contributing Factor:** There are many factors that contribute to accidents or incidents; however, they can usually be broken down into four major categories: people, equipment, materials and the environment.
- **Direct Causes:** events, conditions or acts that immediately precede the accident/incident. Immediate/direct causes are usually the symptoms of the root/basic cause, not the root cause itself. They are usually related to uncontrolled hazards arising from substandard conditions and/or substandard actions.
- **Indirect Causes:** are conditions that directly contribute to the occurrence of a direct cause.
- **Root Cause:** real or underlying cause(s) of accidents/incidents. They are not always immediately evident.
- Analysing all information – contributing factors, direct, and indirect causes – increases the likelihood of finding the root cause(s). Finding the root cause(s) and implementing corrective actions will in turn prevent similar accidents/incidents in the future.
- A requirement to identify corrective action: Recommendations should:
  - Be clearly written,
  - Be as specific as possible – what, where, when,
  - Define who is to complete the action, and
  - Identify target dates for implementation and follow-up.
- A requirement for senior management review and sign-off once investigations are complete and follow-up action has been taken to prevent a recurrence of the incident.
- In the case of a major injury or incident the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.

Incident investigation occurs as soon as reasonably practicable, while the facts are still fresh within the minds of those involved (i.e. witnesses). For example, if evidence could be lost or a significant risk to workers is present, an investigation should start immediately. In other scenarios, logistics or circumstances may delay an investigation from starting immediately.

Take the opportunity to talk to all of those involved before they become unavailable or memory fades. An incident investigation must be thorough and concerned only with cause and prevention and must be separate from administrative disciplinary action.

It is vital not to fix blame during an incident investigation. The purpose of the investigation is to find the facts and prevent incident recurrence.

Employees will be made aware of investigation policies and procedures and investigation results will be shared with employees at safety meetings, posted at the worksite, and/or emailed to employees and other business units.

*(Forms – Incident Investigation Form, Incident/Near Miss Report)*

### 9.2.1 Accompanying Employees to Medical Treatment

Whenever possible an authorized individual shall accompany any injured worker to the medical provider for initial treatment. This is to ensure the medical provider has all required information regarding the administration of worker's compensation, availability of return to work job functions available and to ensure the worker receives the best possible medical attention.

### 9.2.2 Incident Classifications

**Near Miss:** An incident occurred that had the potential of becoming a higher level incident of actual injury, damage, etc.

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**Potentially Serious Incident (PSI):** A PSI is any event where a reasonable and informed person would determine that under slightly different circumstances, there would be a high likelihood for a serious injury to a person.

**Job Related Injury:** An injury to staff, contractor or client staff occurring during work related activity.

**Job Related Illness:** A job related illness effecting staff, contractor or client occurring during work related activity.

**Fatality:** An injury resulting in the death of a worker.

**Vehicle Damage:** Damage to personal, business, contractor or client owned vehicles or mobile equipment.

**Property Damage:** Damage to personal, business, contractor or client owned property occurred.

**Security Incident:** Any incident involving the security of staff, contractor or client facilities, theft, violence or other security related incidents.

**Fire/Explosion/Flood:** Any unplanned incident involving fire, explosion or flood.

**Spill:** The unintended release of a hazardous substance that touches the ground.

**Contractor Related:** Any incident involving a contractor of Mobile Energy Systems

**Non-Conformance:** An incident occurred because a safety, environmental or quality rule, policy or procedure was not followed.

**Reportable Collision:** Current legislation in Alberta requires a traffic collision be immediately reported to the police if it results in death, injury or property damage of \$2000 or more.

**Regulatory:** Any violation of federal, provincial, municipal or client legal or other requirements.

**Work Refusal:** Any situation that employees deem the conditions being unsafe or unhealthy where they do not feel work can continue without placing themselves, the environment, or the public at risk.

### 9.2.3 Job Related Injury Classifications

Injuries shall be classified per the following:

**Fatality:** An injury resulting in the death of a worker.

**First Aid:** Dressing on a minor cut, removal of a splinter, typically treatment for household type injuries.

**Lost Workday Case (LWDC):** An injury that results in a worker being unfit to perform any work on any day after the occurrence of an occupational injury.

**Number of Lost or Restricted Workdays:** The number of days, other than the day of occupational injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked.

**Occupational Injury:** An injury which results from a work related activity.

**Occupational Illness:** Any abnormal condition or disorder caused by exposure to environmental factors while performing work that resulted in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Do not include minor treatments (first aid) for illnesses.

**Recordable Medical Case (RMC):** An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) and yet results in no lost work time beyond the day of injury.



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**Restricted Workday Case (RWDC):** An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the day of injury. An example would include an injured associate is kept at work but not performing within the essential functions of their regular job.

**Work or Work Related Activity:** All incidents that occur in work related activities during work hours, field visits, etc. are reportable and are to be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered a worker's primary work are not reportable.

The following are examples of incidents that will not be considered as recordable:

- The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or vaccination, exercise class, racquetball, or baseball.
- The injury or illness is solely the result of a worker eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). The injury or illness is solely the result of a worker doing personal tasks (unrelated to their employment) at the establishment outside of the worker's assigned working hours.
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the worker is infected at work).

#### 9.2.4 Corrective Actions

Managers are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at the workplace and tracked by the Health and Safety Representative to ensure timely follow up and completion.

Corrective actions are also used as needed for revisions to site specific safety plans and the Mobile Energy Systems Health and Safety Management System.

All incident investigations will be brought to closure.

### 9.3 Legal Reporting Requirements

In addition to internal reporting requirement for Mobile Energy Systems there are additional legal requirements for notification:

Provincial OHS acts require either the Prime contractor or Mobile Energy Systems to report serious injuries, illnesses, and incidents as soon as possible; in addition, Provincial legislation also requires Mobile Energy Systems to investigate any serious injuries and report specific types of incidents. These may include any fatalities or injuries where a worker and/or subcontractor is hospitalized, potentially serious incidents, and incidents involving fire, flood, explosion, building collapse, and collapse/upset of a crane, derrick or hoist. Mobile Energy Systems shall follow the local provincial reporting requirements.

While Potentially Serious Incidents (PSI) must still be reported, Provincial Legislation allows for PSIs to be reported once the investigation is completed.

First aid legislation requires all injuries treated at the worksite be recorded and the record be treated as confidential and kept in a secure area for three years. Mobile Energy Systems shall follow the local provincial reporting requirements.

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WCB legislation requires that Mobile Energy Systems only has **72 hours** (a fatality is reported immediately) to complete and submit the Employer's Report of Injury or Occupational Disease form after receiving notice or knowledge of an injury or illness that disables or will likely disable a worker and/or subcontractor beyond the date of accident.

Mobile Energy Systems shall follow the local provincial workers and/or subcontractors' compensation reporting requirements. WCB claim forms for both Mobile Energy Systems and the worker and/or subcontractor can be found at:

- Employer's Report of Injury form by fax: <https://www.wcb.ab.ca/assets/pdfs/employers/c040.pdf>
- Employer's Handbook can be found here: [https://www.wcb.ab.ca/assets/pdfs/employers/employer\\_handbook.pdf](https://www.wcb.ab.ca/assets/pdfs/employers/employer_handbook.pdf)
- Workers' Reporting forms: [http://www.wcb.ab.ca/workers and/or subcontractors/report\\_injury.asp](http://www.wcb.ab.ca/workers and/or subcontractors/report_injury.asp)
- Workers Handbook can be found here: [http://www.wcb.ab.ca/pdfs/workers and/or subcontractors/WCB-003\\_Worker\\_Handbook.pdf](http://www.wcb.ab.ca/pdfs/workers and/or subcontractors/WCB-003_Worker_Handbook.pdf)

Scanned copies of original forms will be kept in the office and are used by management to track and make changes to ensure your safety as much as possible.

- Completed Employer's Report
- Completed Worker and/or Subcontractor's Report

Injuries that need to be reported are:

- Work-related injury that causes (or is likely to cause) a worker and/or subcontractor to be off work beyond the day of the injury.
- An injury that requires modified work beyond the day of injury.
- An injury that requires medical treatment beyond first aid.
- An injury that may result in a permanent disability.

If an injury is serious or had the potential to be serious, the local province may also conduct an investigation at the worksite. When this happens, all workers and/or subcontractors are required to co-operate with the investigation.

Current legislation in Alberta requires a traffic collision be immediately reported (within 24 hours) to the police if it results in death, injury or property damage of \$2000 or more. Prior to January 1, 2011, the reporting level was \$1000. A collision report form is completed and data is then collected from these collision forms.

## 9.4 Incident Report and Investigation Forms

Mobile Energy Systems has developed standard incident report and investigation forms for use. Mobile Energy Systems requires all workplace incidents, illnesses, near misses, and work refusals to be investigated.

### 9.4.1 Incident / Near Miss Report Form

The Mobile Energy Systems Incident / Near Miss Report Form is required to ensure that all relevant information is captured and maintained. The incident report form will be completed immediately after the event by the worker(s) involved and a copy given to the worker(s). The Mobile Energy Systems copy of the Incident Report Form is used to initiate the incident investigation and will be maintained on file.

### 9.4.2 Incident Investigation Report Form

The Mobile Energy Systems Incident Investigation Report Form prompts the investigation team to follow correct investigation procedures and will lead them to the identification of the root causes and appropriate follow-up action.

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#### 9.4.3 Witness Statement Form

The Mobile Energy Systems Witness Statement Form will be utilized to obtain worker and witness information related to all incidents. The form should be completed as soon as possible following the incident, will be dated and signed and attached to the Incident Report Form and Incident Investigation Report Form.

#### 9.4.4 Work Refusal Form

The Mobile Energy Systems Work Refusal Form prompts the investigation team to thoroughly investigate work refusals according to legislative requirements.

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## 10.0 SYSTEM ADMINISTRATION

### Objectives

- To monitor and ensure continuing suitability, adequacy and effectiveness of the HSMS
- To address needs for communication and changes to our HSMS
- The material in this document does not take precedence over applicable government legislation which all employees must follow.

### Assignment of Responsibilities

#### *Health and Safety Representative*

- Monitors health and safety compliance status and HSMS effectiveness
- Updates the HSMS where appropriate based on audits and decisions made in the Management Review
- Implements changes identified in the management review process and resource assessment

### 10.1 Records and Records Management

Mobile Energy Systems must ensure that all aspects the Health and Safety Management System are recorded, tracked and maintained. The record tracking system allows for statistical analysis and the identification of trends that may identify system areas in need of improvement. Examples of records that are maintained include:

- Employee training records
- Warnings & violations (employee & company)
- Worksite inspection records
- Incident investigation reports
- Preventative maintenance records
- Health and safety meeting minutes
- Emergency response records

Health and safety program records should be kept for a minimum of three years.

#### 10.1.1 Records Filing and Accessibility

Safety and health records shall be legible, identifiable and traceable to the activity, product or service involved. The records shall be stored in identified secured locations and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss.

#### 10.1.2 Document and Data Control

The Health and Safety Representative:

- Is responsible for validating and approving all documents and revisions to existing documents,
- Is responsible for assuring documents included in an HSMS are in the proper format, and
- Will ensure documents can be located, current versions are available, and obsolete documents are removed and determine the routing path for review of a controlled document

##### 10.1.2.1 Document Format

HSMS documents shall be consistent in format and include a document date and revision number.

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### 10.1.3 Employee & Driver Files

There will be one file maintained for each employee. All employee files must contain the following information. New employees will submit all of the following information to our office within first 2 weeks of employment.

- Job Application and Resume (complete application if hired after April 1998)
- Employment History with Previous 3 years prior to employment
- Telephone Reference Checks (completed by management)
- Signed & Dated "Statement of Acknowledgement"
- Emergency Contact and Medical Information, signed/dated
- Mandatory Safety and Work Rules must be reviewed, dated and signed.
- All records of employee warnings & violations
- Any accidents, incidents in the last 5 years.
- Copy of current Employees License
- Orientation of New Employees – checklist is initialled and dated by employee as training is completed

Files must also contain the following information (if applicable to position)

- Drug testing and results of drug testing – if applicable
- Physical examination and fitness report – if applicable
- Copy of valid Training Certificates as required for job duties e.g. H2S, WHMIS, First Aid (if applicable)
- Copy of expired training certificates will be kept on file for 2 years
- List of any collisions involving the employee
- A record of Employees Convictions of Safety Laws in the current and previous 4 years
- Employee's drivers abstract (dated less than 30 days) upon hiring (if driving company vehicles)
- Annual copies of Employee's driver's abstracts (if driving company vehicles)
- Record of all training completed by the employee that relates to the operation of a motor vehicle
- Record all training on form for past and present

Employees will have a performance review at the end of the probationary period and then an annual review will be completed on each employee. Reviews may take place after disciplinary action to ensure behaviours have improved.

Mobile Energy Systems will track training tickets and license expiry dates so they can be added and renewed as required.

All employee files will be kept for 5 years, after they have left Mobile Energy Systems.

### 10.1.1 Equipment, Vehicle & Trailer Files

Each equipment, vehicle and trailer file includes:

- Unit/plate or VIN number
- Make and Year of Vehicle

These can be an electronic database, copy of registration, label on file. If the vehicle is leased for more than 30 days each file must contain the name of the person/company furnishing the vehicle.

Each vehicle has a file with the trip inspections for the past 6 months, longer if defaults are found and repairs made. These inspections must include:

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- Date
- Vehicle Identification
- Odometer reading
- Description of work performed on vehicle

Repair records are kept for each vehicle. Each record includes the following information:

- Date
- Vehicle Identification
- Odometer reading
- Description of work performed on vehicle
- Work completed must state whether in-house or outside service
- Repair bills are included in the file or a reference to who completed the work by indicating a provider, invoice # or work order #

All modifications to the vehicles that affect their weight capacity have been recorded and are in the individual vehicle files.

All manufacturers' recalls have been recorded and a copy of the recall notice and date work was completed and by who are in the individual vehicle files.

All notices of defects are recorded when identified on the pre-trip inspections. These notices are filed in appropriate file.

### 10.1.2 Financial Responsibility & Insurance Records

Mobile Energy Systems will carry the minimum level of Public Liability and Property Damage insurance.

Insurance Files will contain the following information:

- Policy or certificate with the policy number.
- Type of insurance
- Insurance company name
- Broker name
- Effective date
- Expiry date
- Coverage limit

Each vehicle in the company must have the following information inside the vehicle at all times:

- Each unit registered in Mobile Energy Systems must carry an original valid - proof of insurance (pink card) not a photocopy, and original registration certificate.

### 10.1.3 Access to Medical Records

Health and safety records will be identified by the Health and Safety Representative and are maintained based on legal, regulatory and business requirements.

Senior Management will maintain applicable medical and exposure records for all workers. All requests to access medical and exposure records and analysis based on those records must be submitted to using the forms provided for that purpose.

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Senior Management will ensure access of each worker and/or their designated representative, to all exposure and medical records concerning the worker's work conditions or workplace within 15 working days from the day request is made. If the records cannot be provided within 15 working days, the worker or designated representative requesting the record shall be informed with the reason(s) for the delay and the earliest date when the record(s) can be made available.

Except for a recognized collective bargaining agent, any designated representative must have the worker's written permission for access to exposure records and analyses.

Employees or their representatives will be provided with one copy of the records at no cost or free use of a copying machine. There will also be no charge for the first request for information by a recognized collective bargaining agent, even if the worker has previously received a copy of the same record. Additional copies will be provided at a cost of five cents per copy. Each copy provided will be stamped with the word COPY. At no time will original records and/or x-rays be loaned out to enable the requesting party to make a copy.

The authorized physician, nurse or other responsible health care personnel maintaining worker's medical records may delete the identity of anyone who has provided confidential information concerning the worker's health status but cannot withhold the information itself.

When an analysis of medical records identifies the worker, a physician may remove direct or indirect personal identification. If this cannot be done, the personally identifiable portions need not be provided to the person seeking such information.

Employees and their designated representatives will be permitted upon request access to past and present exposure data to toxic substances or harmful physical agents.

Copies of exposure records of other workers with past or present job duties or working conditions like or similar to those of the worker will also be provided upon request.

## 10.2 Non-Retaliation

Retaliation against an individual for in good faith filing a request or making a claim under this or related policies, for instituting or causing to be instituted any proceeding under local regulatory guidelines or federal anti-discrimination or anti-retaliation laws, for testifying in an investigation or proceeding, or for otherwise opposing discriminatory or retaliatory actions or practices will not be tolerated. Retaliation by any Mobile Energy Systems worker is a violation of this policy. Individuals who believe they are the victim of discrimination or retaliation and those who suspect discrimination or retaliation should report the matter to their immediate supervisor, the head of their department or the Human Resources Department.

## 10.3 Privacy Policy and Procedures

The protection of personal information is important to Mobile Energy Systems and we have a policy and procedures dealing with the protection of privacy. Any questions about this policy can be directed to the Privacy Officer. Reference: Bill 44, the Personal Information Protection Act came into force January 2004.

Our employees and company play an important role in protecting personal information. Our employees are required to adhere to this policy and take all reasonable steps to ensure that personal information is protected from unauthorized access.

Our organization does not usually collect personal information from individuals as customers (other than contract information). In the event that we do collect personal information from an individual customer, that information will only be used by us to administer the contract for the product and/or services. When we do deal with individuals as customers, we collect the following types of personal information:

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#### **Customer or Company Name**

- In order to contact the customer for instructions and billing purposes

#### **Billing Address**

- In order to bill the customer for the services we provided

#### **Telephone Number**

- If requiring additional information regarding the services we are providing

#### **Name of Contact**

- If requiring additional information regarding the services we are providing

#### **Land Location of the Site for Billing Purposes**

We only collect personal information directly from the customer except when we have the customers consent to collect information from elsewhere or are permitted by law to collect it without the customers' consent.

We only use a customer's personal information for the purposes outlined above.

We disclose customers' personal information to the following third parties if the customer has requested us (by phone or fax) to forward information on to the customer. We do not disclose personal information to third parties for any other reason.

Business contact information is not protected by this policy. This type of information is not considered to be personal information and may be collected, used and disclosed without consent.

#### **Consent**

In most cases customers consent to us collecting, using and disclosing personal information for the purpose outlined above and simply agree to provide us with the personal information.

#### **Storing Your Personal Information**

Information is kept after a project is completed in order to resolve any problems or concerns that may arise. We only keep personal information relating to customers for billing purposes. Our customers have the right to access the personal information we hold regarding them.

We apply our best efforts to protect our customer's privacy. If our customers have any concerns, they are free to contact our Privacy Officer. We hope that the Officer will be able to resolve any problems. If concerns are not resolved, the Officer can provide information about making a formal complaint.

#### **Collect, Use and Disclosure of Personal Employee Information**

"Personal Employee Information" is personal information collected, used or disclosed for the purpose of establishing, managing or terminating an employment relationship.

"Personal Employee Information" includes the following:

- Name
- Home Address and Phone Number
- Employment History
- Disciplinary Record
- Tax Credit Information (Provincial & Federal)



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- Medical Information or Disability
- Social Insurance Number
- Age
- Wage or Salary paid
- Sex
- Safety Certificates
- Family Status
- Marital Status
- Drives Abstract
- Alberta Health Care Number
- Spouse Details
- Children Details
- Beneficiary for Group Insurance

We will not disclose personal employee information to any other third party unless we have **written permission** from the employee and provide our employees with prior notification. We will **not** disclose the personal information of minor employees except to the government for the sole purpose of payroll and taxes and only with proper signed documentation for giving a work reference.

Our personal employee information is safe guarded to prevent unauthorized access, use and disclosure.

It is important to Mobile Energy Systems to keep our personal employee information as up to date as possible.

Employees may access their personal employee information by making a request to the Privacy Officer. This individual can also address any concerns about the collection, use or disclosure of personal employee information.

Please feel free to contact the Privacy Officer with any questions.

If your position with our company is terminated, please make arrangements to have the appropriate documents signed if you would like us to release information and details about which information can be released. An example would be if you require the above individual to supply job references, etc.

## 10.4 Disciplinary Enforcement Policy & Procedure

Management is committed to the safety of its workers by providing an injury and incident free workplace. All workers are to abide by the regulations, safety rules and the use of safe work practices and procedures. Safety violations will be handled in an objective but firm manner. The enforcement progression follows the steps outlined below (see schematic) with documentation at each stage:

**Misconduct:** Employee breaks rules for keeping the workplace efficient and safe.

- Verbal Warning
  - Communicate expectations
  - Gives employee the opportunity to tell his/her story about the misconduct.
  - Collection of all the relevant facts surrounding the misconduct.
  - Everything is documented
- Written Warning
  - Documented details and expectation– placed in personnel file
- Suspension

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- Documented details and expectation – placed in personnel file
- Termination
  - Documented

**Incompetence:** Employee lacks the skills or ability to do the job.

- Clarification
  - Clear, reasonable job expectations are communicated.
  - Unacceptable work promptly communicated to the employee.
- Retraining & Supervision
  - Reasonable supervision, training and instruction is provided.
  - Reasonable warning is given including failure to meet expectations could result in dismissal.
  - Allow reasonable time and opportunity to meet the job expectations. (depends on situation what reasonable time will be)
- Termination
  - Documented

#### **Mitigating and Aggravating Factors**

Factors that will be considered in applying the progressive discipline process in cases of either incompetence or misconduct. Examples include:

- Was the misconduct intentional?
- Is the employee accepting responsibility for his/her actions?
- Seriousness and/or frequency of the problem?
- Employee's work history?
- Effect on the organization?

#### **Situations for Disciplinary Action**

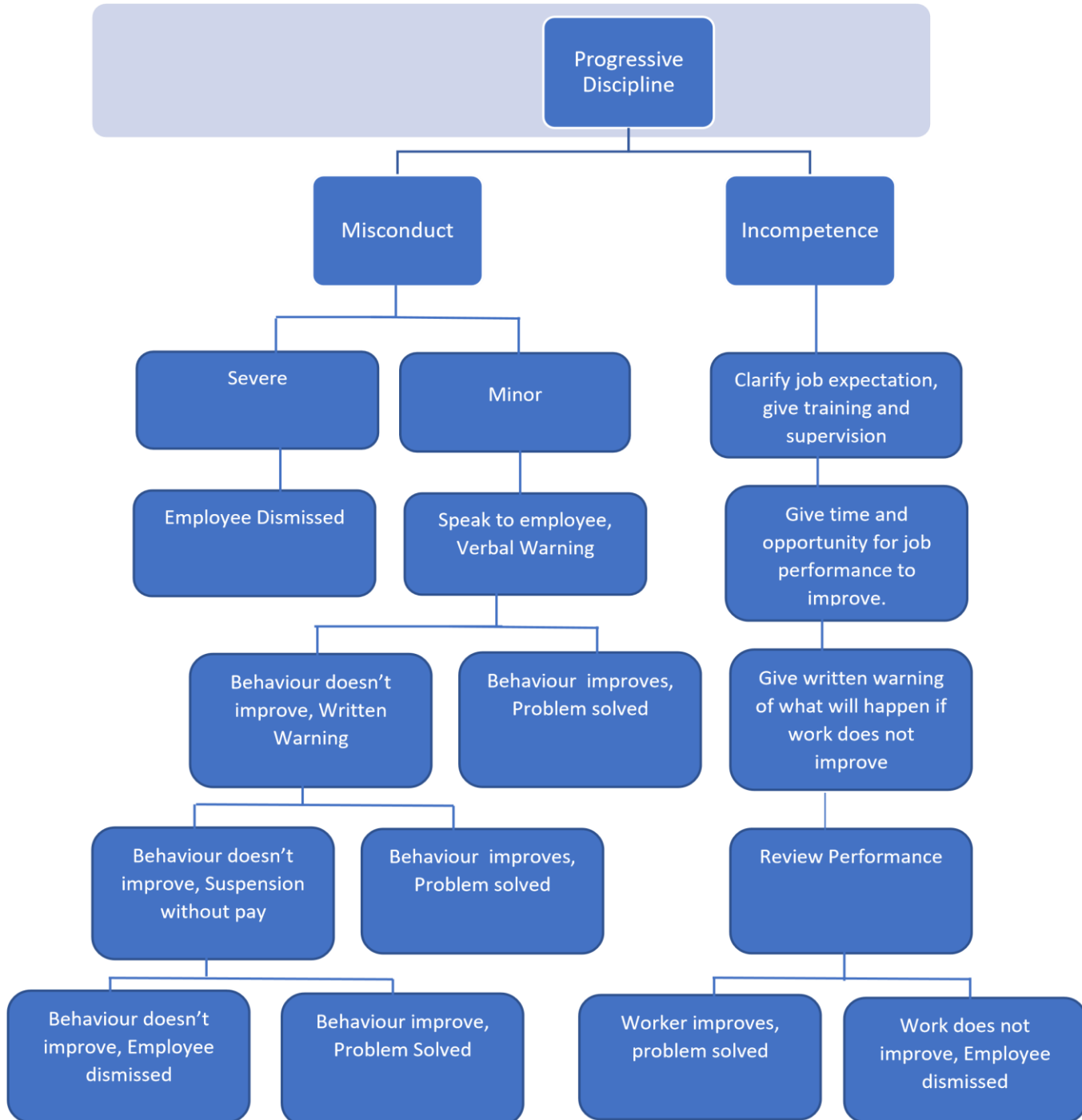
Violation of any of the following rules will not be tolerated on the job and are grounds for immediate discipline up to and including dismissal:

- Consuming or being in possession of alcohol or illegal drugs on company premises, or on any company job-site, is prohibited.
- Fighting, horseplay, practical jokes or otherwise interfering with other workers is prohibited.
- Theft, vandalism or any other abuse or misuse of company property.
- Not reporting all incidents that result in or could create danger or injury to a supervisor immediately.
- Not providing first aid treatment promptly for any injury.
- Not wearing hard hats, safety boots or other required PPE at all times on all job-sites.
- Not carrying out work in accordance with appropriate safe work practices and the supervisor's direction.
- Not using tools that are in good repair, with all guards and safety devices in place.
- Not keeping the work area neat, clean and orderly.
- Attempting or actually using physical force to cause injury, threatening statements or other actions to cause a worker to feel they are at risk of injury.

*(Form – Employee Discipline Report)*

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#### 10.4.1 Progressive Discipline Schematic



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## 10.5 Accountability

There is accountability with the Mobile Energy Systems Health & Safety Management System. Workers and management will be held accountable for their actions and behaviour. It is important that everyone understand their responsibilities for workplace health and safety:

- Mobile Energy Systems holds the ultimate responsibility and is legally and morally responsible for what happens on its worksites.
- Supervisors have the administrative responsibility and must ensure that required training, supervision, enforcement, etc. are maintained and the desired results are achieved.
- Workers have the immediate responsibility to take the required training, wear required PPE, use the assigned controls, follow all rules and participate where required in the health and safety program.

Mobile Energy Systems procedures identify who is responsible for what, the date by which actions must be completed and the follow-up required to ensure that action taken was effective.

Measurable goals and objectives and assigned accountability are being used to drive health and safety performance.

## 10.6 Monitoring Statistics

Mobile Energy Systems maintains an ongoing system for recording events in order to compare statistics over a period of time. Leading indicators measure the activities used by the organisation to reduce the likelihood of an incident. Lagging indicators analyze the frequency, severity, and type of incidents.

Mobile Energy Systems will maintain and analyze statistics to help identify trends in both leading and lagging indicators. Leading indicators that can tell if systems are working as expected could include:

- Records of inspections - Are inspections being performed as required?
- Meeting minutes - Are safety meetings being held according to the schedule?
- Investigation reports - Are appropriate causes being identified? Are corrections being made in a timely manner?

Maintaining statistics over time will allow the identification of trends which can be useful in determining where system changes may be needed.

Lagging indicators that can be useful to identify areas in need of improvement could include:

- The number, severity and cost of injuries and other incidents at the worksite
- The number of days lost due to absenteeism
- Maintenance records

To further identify where improvements can be made Mobile Energy Systems should, where possible, compare its health and safety records to those of similar companies in the same industry.

### Health and Safety Key Performance Indicators (KPI)

KPIs are used to determine what changes need to be made, to review individual project management success towards compliance and to track progress towards published goals and objectives. KPI results are supplied to Mobile Energy Systems management on a monthly basis. Health and Safety KPIs are tracked for each manager's responsible area and include:

- Injuries
- Days Away from Work Cases

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- Restricted Work Cases; Recordable Medical Cases
- Total Recordable Injuries/Illness and Incident Rate
- First Aid Cases
- Hours Worked
- Vehicle incidents and property damage or loss
- Reportable spills
- Workers compensation data

## 10.7 Written Safety and Health Goals, Objectives and Programs

### Objectives

- To establish and maintain proactive documented safety and health objectives within Mobile Energy Systems.
- To have objectives consistent with our safety policy and our commitment to continual improvement.

### Responsibilities

#### *Health and Safety Representative*

- Develops the safety and health objectives for Mobile Energy Systems on an annual basis.
- Occupational health and safety objectives and targets

#### *Managers and Supervisors*

- Train employees on objectives.

#### *Employees*

- Provide input into objectives planning through involvement.

### 10.7.1 Annual Safety and Health Goals

Senior Management identifies goals by:

- Aligning objectives with Mobile Energy Systems policy, legal and other requirements, hazard abatement procedures
- Making objectives specific, measurable and achievable
- Gathering input from employees and interested parties
- Incorporating Management Review procedure results

Examples of goals include:

- Reduction of risk levels
- Elimination or reduction in frequency of undesired incidents
- Implementing additional features of the Mobile Energy Systems Safety & Health Management System

After goals are identified, Senior Management prioritizes them, establishes a scope, objective, time scale, target completion date, responsibilities and resources requirements for each identified objective/goal.

Performance against developed goals is measured by and communicated to employees in memos, safety meetings and other as-needed methods.

Developed goals are reviewed and modified on a quarterly basis. If circumstances have changed since the original formation of goals adjustments may be made and documented.

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Progress on achieving goals is reviewed as part of the Key Performance Indicator procedure and Management Review procedure.

## 10.7.2 Objectives and Safety Programs

### Responsibilities

#### *Senior Management*

- Develops, documents and communicates the safety and health management programs to achieve identified safety and health objectives.
- Monitors progress towards objectives.
- Updates and revises safety and health management programs accordingly.

#### *Managers and Supervisors*

- Implement safety management programs.

#### *Employees*

- Follow requirements of safety and health management programs.

### Procedure

Senior Management establishes safety and health management programs based on objectives and responsible parties are notified of their requirements.

Where significant modifications in working practices, processes or equipment are expected the management program will provide for new hazard identification and risk assessments.

Progress for safety and health management programs is reviewed as part of the Key Performance Indicator procedure and Management Review procedure.

## 10.8 Audit System

Whether completed by internal or external auditors, annual audits give Mobile Energy Systems a means of identifying how its system measures against a recognized standard. Audit results communicate program successes as well as identify areas in need of improvement and will form the basis of action plans designed to make specified individuals accountable for corrective action within set timelines.

Management will follow up on the status of the action plan on a regular basis to ensure action items are being completed. The Health and Safety Representative maintains a record of the audit. Results of the annual audit are incorporated into changes to the Mobile Energy Systems Health and Safety Management System, site specific HSE plans or appropriate safety procedures.

#### Requirements:

- The health and safety system will be evaluated at least annually through the use of an audit process.
- An action plan will be developed and implemented as a result of any internal or external audit.

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## 11.0 INJURY MANAGEMENT AND RETURN TO WORK

### 11.1 Injury Management & Return to Work Policy Statement

It is the policy of Mobile Energy Systems to maintain and support an Injury Management/Early Return to Work Program. This program is designed to minimize the disruption and uncertainty that can accompany an on-the-job injury for both the company and our employees.

It is our goal to maintain a safe workplace for our employees. When an injury does occur, our Injury Management/Early Return to Work Program helps make the process of returning to work as smooth and efficient as possible. This process includes the employee, doctor and supervisor to ensure your health and recovery is always given top priority.

When an on-the-job injury occurs, you can expect prompt medical attention. If the injury results in a prolonged absence from work, you may be a candidate for our Injury Management/Early Return to Work Program. This program offers a medically approved light-duty transitional assignment in anticipation of a return to full duty, or vocational rehabilitation, if necessary.

The success of this program is the responsibility of everyone in the company from top management to every employee. Only by working together can we provide a safe and secure work environment.

Everyone should be alert for potential incidents and strive to eliminate them. If you are aware of an unsafe act or condition, it must be reported immediately to your supervisor to be addressed. This action may prevent an injury from occurring. If an injury does occur, the injury must be reported immediately to a supervisor.

Mobile Energy Systems will monitor and review the Injury Management & Return to Work program on an annual basis. Each individual worker Injury Management & Return to Work plan will be monitored by the Health and Safety Representative and Management to ensure the injured worker returns to work according to medical advice. The Injury Management & Return to Work plan will be signed off and completed once the worker has a full return to work.

### 11.2 General Guidelines

It is the goal and commitment of Mobile Energy Systems to implement our Return to Work Program to return workers to meaningful, productive temporary employment following injury or illness until their health care provider releases them to full duty.

If a worker is injured on the job Mobile Energy Systems will make all reasonable efforts to return the person to work in any capacity that is approved by their physician and in accordance with governing workers' compensation legislation.

Mobile Energy Systems will track outcomes of the Injury Management/RTW Program and has established a process to address opportunities for improvement of the Injury Management/RTW program.

Resources will be provided to support the Injury Management/RTW process. Employees will receive information on the Mobile Energy Systems Injury Management/RTW Program as part of their New Employee Orientation.

The return to work program provides opportunities for any worker who sustains a compensable injury during the course and scope of employment to safely return to work. If the worker is not capable of returning to full duty, the return to work program provides opportunities for the worker to perform a temporary assignment, either modified or alternative duty as defined below.

Mobile Energy Systems will maintain written records of incident details. This will help them recall information about the circumstances of the incident at a later time, and will demonstrate due diligence. Incident investigation records

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should be maintained. Records should be kept of communications with the injured employee regarding modified work. Workers Compensation and medical records, where applicable, should also be maintained.

### 11.3 Definitions

**Lost Time:** Time spent away from work beyond the day of injury at the direction of the treating health care provider as a result of a compensable injury sustained in the course and scope of employment. The term does not include time worked in a temporary assignment.

**Full Duty:** Performance of all duties and tasks of the position for which the worker is employed. Full duty entails performing all essential and non-essential functions of the worker's regular job.

**Temporary Assignment:** Performance of a temporary job assignment intended to return an injured worker to work at less than his or her full duties when a serious injury or serious medical condition prevents the worker from working full duty. Temporary assignments are limited to six months at the same pay, beyond six months; the program will be reviewed in assistance of Mobile Energy Systems management to determine the next best course of action. Temporary assignments are modified duty and alternative duty.

**Modified Duty:** Modified duty allows the worker to return to employment in his/her regular job and perform all of the essential functions of the position and those nonessential duties and tasks that are within the capabilities of the worker, given the restrictions imposed by the treating health care provider. Modified duty is a temporary arrangement until the injured worker can resume full duty. If during the course of the modified duty assignment or after six (6) months, whichever is sooner, it is determined that the worker has permanent restrictions, the program will be reviewed in assistance of Mobile Energy Systems management to determine the next best course of action.

**Alternative Duty:** Alternative duty allows the worker to temporarily perform the essential functions of a job and other nonessential duties and tasks, within the restrictions prescribed by the treating health care provider, other than the position for which the individual is employed (regular full-time position). Such alternative duty may be physically located in the same employing department or in a hosting department. Alternative duty is a temporary arrangement until the injured worker can resume full activities of his/her regular job or until an alternate duty position is no longer needed.

**Hosting Department:** This is the department that has a temporary assignment position available but not necessarily the worker's department.

**Employing Department:** Department that the worker is permanently assigned to for his/her full duty regular job.

### 11.4 Prohibited Actions

This return to work program shall not be applied to any situation or circumstance in a manner that retaliates or discriminates on the basis of race, colour, sex, age, national origin, religion or disability.

### 11.5 Authorization for Leave and Lost Time

A worker who must miss work due to an injury or illness must be certified by a health care provider to be off work. It is the worker's responsibility to obtain such documentation from the health care provider and to return it to the supervisor within one working day upon receipt. Employees will be reimbursed for any costs in obtaining written documentation from a health care provider with a valid receipt of payment.

If the health care provider states that the worker cannot perform any temporary assignments/modified duties, Mobile Energy Systems may challenge the decision depending on the injury and request independent medical information. Some Mobile Energy Systems sites have a local health care provider that workers may be requested to visit.



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## 11.6 Process

### 11.6.1 First Response to Injury

An injured worker will inform their supervisor immediately of any injuries sustained in the workplace and receive prompt first aid treatment and medical treatment by a healthcare professional when required.

The worker must provide to management all relevant documentation outlining any restrictions from the injury/illness before returning to work. All information provided will be kept confidential.

### 11.6.2 Employee Reporting Requirements

A worker who is a candidate or participant in a modified or alternative duty temporary job assignment under the Return to Work program is responsible for reporting to the Workers Compensation agency any employment or income earned while performing modified or alternative duty if required by the Workers Compensation agency.

A worker participating in the Return to Work program must provide their supervisor with medical documentation accounting for all absences due to the injury/illness within one day of any absence from work, or face disciplinary action, up to and including termination.

### 11.6.3 Contact with Worker

If a worker is required to take time away from work, they must maintain regular contact with Mobile Energy Systems management regarding an early and safe return to work.

Mobile Energy Systems will make initial contact with the injured worker no later than 48 hours after the instruction to take time away from work. Mobile Energy Systems will maintain correspondence in an effort to return an employee back to work as quickly as possible.

### 11.6.4 Mobile Energy Systems Requirements for Reporting

Management must report the following to WCB:

- Any changes in wages as a result of the modified duty,
- Any changes in the duties or the duration of the program that are not within the regular scope of work for the trade,
- The inability of the employee to comply or participate in the program,
- The completion of the program.

### 11.6.5 Return to Work Coordination

The Health and Safety Representative will assist managers and supervisors with return to work activities/plans for individuals who have sustained a compensable injury or illness during the course and scope of employment. The Health and Safety Representative must have adequate training and knowledge of the local provincial WCB requirements.

Where applicable, Human Resources and Union Representatives will also assist with return to work activities for workers.

## 11.7 Modified Duties and Job Assignments

A worker who is absent due to an injury or illness is required to submit written verification of the injury or illness from a qualified health care provider. Such verification must be submitted to the supervisor within one working day upon receipt of the documentation and in compliance the appropriate local Workers Compensation Act and Mobile Energy Systems policy.

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A copy of the worker's regular job description must be supplied to the health care provider.

If the worker is unable to perform the essential functions of their regular job, a temporary Modified Work Plan is developed by the HSE Manager in consultation with operations management. The Modified Work Plan must be completed in writing and accepted or declined by worker. The accepted or declined plan must be forwarded to the Health and Safety Representative which will forward a copy to the local effective Worker's Compensation administrator.

The worker must obtain the appropriate forms from their supervisor or the Health and Safety Representative to be completed by his/her health care provider at each visit or every rotation, whichever is sooner, for assessment of the worker's ability to perform the functions of the temporary assignment/modified work position offered and accepted.

A worker who chooses not to continue a temporary assignment/modified job must notify the employing/hosting department and/or Health and Safety Representative immediately in writing. A worker who fails to accept a local worker's compensation administrator's approved temporary assignment/modified work job and abandons his/her job may be subject to disciplinary action including termination, but local regulatory requirements must be followed.

## 11.8 Stay at Work Initiative

Mobile Energy Systems will offer an injured worker immediate light-duty or transitional work modified duties where medically possible. A Stay at Work initiative is a proactive way for managers to help injured, and where applicable, ill employees stay at work if it is safe to do so. These initiatives are intended to be transitional and for a fixed duration. These plans may be integrated into a worker accommodation plan, when required.

Stay at Work Initiatives are based on the understanding that:

- Adjustments and accommodations can often be made to the workplace so that the employee can safely remain at work.
- Many employees can safely perform productive and meaningful work while they are recovering from an injury or illness.
- Some illnesses are episodic, and adjustments to the workplace can be made to have employees attached to the workplace through remain at work planning.
- Attachment to work is beneficial and part of the recovery process for employees.

When assessing Stay at Work situations. Mobile Energy Systems will:

- Discuss potential workplace barriers to ensure they have been identified, addressed, and mitigated where possible.
- Assess the situation with employees, different situations require different solutions.
- Involve Human Resources and Union Representatives when the situation requires assistance.
- Outline work adjustments, objectives and expectations where they need to be modified.

## 11.9 Communication

Workers and supervisors are made aware of the program and of its benefits. In addition, all supervisors and workers must understand the processes involved. Mobile Energy Systems will ensure workers are educated in the usage of the early intervention process, as well as, if time away from work is required, the assistance of the return-to-work program provided in reintegrating an injured worker back into the workplace. Mobile Energy Systems shall also communicate with medical practitioners our Injury Management/RTW initiatives.