

Supporting Programs

Chapter 15

1 - Rehabilitation of Injured Employees.....	4
Responsibilities	4
1.1. Rehabilitation Responsibilities.....	4
Senior Management:	4
Superintendents:	4
Supervisors:.....	5
Employees:.....	6
Work Comp. Tech Ltd.:	6
1.2 Stay at Work Program and Return to Work.....	7
Refusal of Modified Work Offer.....	8
Follow-up after Return to Work.....	8
1.3 Contested Claims	9
Appealing Injury Claim Decisions.....	10
Claims Cost Controls	10
Work Comp Tech Ltd. Services.....	10
2. ERGONOMICS.....	11
Policy	11
Responsibilities	11
Definition of Ergonomics and MSI	11
Risk Identification and Assessment	12
Involvement of Safety Committees	12
Implementing Controls	13
Safe Practices/Procedures	13
Tool Selection and Ergonomic Design Considerations.....	13
Training/Education.....	13
Preventing MSI – Stretch and Flex Program	14
Treatment of MSI.....	14
3. Workplace Harassment and Violence Procedure	15
What is workplace harassment or violence?	15
What you can do;.....	16

Responsibilities 16

Making a complaint 16

Investigative Process..... 17

Time Schedule 17

Review Process..... 17

Appeal Process 17

Confidentiality..... 17

Support 17

4. Silica Code of Practice 19

 Purpose 19

 Scope..... 19

 Policy 19

 Exposure Limits/Considerations: 20

 Silica Exposures 20

 Health Assessments 20

 Training 21

 Monitoring 21

 Exposure..... 21

5. Crisis Management Team 23

 Purpose 23

 Special Terms 23

Procedures 24

 Media Relations 24

 Team Development..... 25

 Team Member Responsibilities 25

 Procedure Development and Plans 27

 Crisis Management Centre 27

 Team Member Training 28

 Crisis Team Exercise 28

 Existing Crisis Mode 28

 Crisis Phonebook:..... 29

 Crisis Procedures..... 30

 Bomb threat 32

Natural Disasters..... 33

1 - Rehabilitation of Injured Employees

Canadian Road Builders Inc. is committed to a progressive policy of full and complete rehabilitation of injured employees.

Responsibilities

To accomplish this policy, the following responsibilities are outlined:

1. Management will supply the necessary resources to support the above policy.
2. Area Foremen will support and encourage the use of modified work.
3. Supervisors of injured employees are responsible for ensuring that all actions necessary for accident reporting and rehabilitation procedures are carried out.
4. Work Comp. Tech Ltd. shall oversee and review the rehabilitation of injured employees to ensure the best possible treatment and quick return to full duties.
5. Injured employees are responsible for wholehearted and genuine cooperation in all aspects of their rehabilitation program.

1.1. Rehabilitation Responsibilities

Senior Management:

Responsibilities:

Senior Management is responsible for supplying all necessary resources in support of the rehabilitation policy. They are accountable to the General Manager.

Duties:

1. Ensure that all reasonable efforts are made to accommodate any employee injured on the job to return to work, taking into account restrictions based on the nature of the injury.
2. The Senior Management will direct the Safety Manager / Facilitator to supervise the implementation of this policy.

Superintendents:

Responsibilities:

The Superintendents shall be responsible for the implementation of the company rehabilitation policy in their area of responsibility. They will, with direction and assistance from the Safety Manager/Facilitator, outline the company's rehabilitation policy and assign specific responsibilities to the Supervisors. They are accountable to the Senior Management.

Duties:

1. Support and encourage the use of modified work within their division.
2. Assist in the proactive identification of innovative modified work assignments.
3. Follow up with the supervisor and employee to ensure all aspects of the case are progressing without event or concern.
4. Ensure all Supervisors are trained in the reporting of injuries and the WCB claims management system.

Supervisors:

Responsibilities:

The Supervisors shall be responsible for understanding and communicating the rehabilitation policy to all their employees. They are accountable to their superintendent.

Duties:

1. Ensure all employees understand that all incidents and / or injuries occurring on the job must be reported.
2. Provide First Aid treatment to the injured employee and document the time and date of the injury, how it occurred, and the treatment provided.
3. If medical attention is required, provide employee with transportation to the nearest appropriate medical facility or call 911 for an ambulance.
4. Ensure all necessary WCB and/or WCTL forms have been given to the employee for completion. Report the incident / injury to the Superintendent and the Safety Manager / Facilitator.
5. Assist the Safety Manager / Facilitator in completing all accident investigation reports.
6. Implement immediate corrective actions for any incident or accident.
7. Ensure assigned work duties of the injured employee comply with the stated work restrictions listed on the Return-to-Work form. This is to be done in cooperation with the Safety Manager / Facilitator.

Employees:*Responsibilities:*

Employees shall familiarize themselves with all aspects of the rehabilitation program and shall participate in the program to the best of their ability.

Duties:

1. Understand that all injuries/incidents occurring on the job must be reported in a timely fashion.
2. Instruct their doctor that Canadian Road Builders Inc. will provide modified or light duty work and that Canadian Road Builders Inc. will cooperate in any medical treatment.
3. Ensure that the Modified Work form from WCTL is completed by their attending physician at the time of treatment.
4. If applicable, complete the WCB Workers' Report of injury form and submit it to the Safety Manager / Facilitator within 24 hours of the injury.
5. Accept the modified work offered to them with the consent of their physician.
6. Participate wholeheartedly in their rehabilitation program.

Work Comp. Tech Ltd.:

Canadian Road Builders Inc. has entered into an agreement with WCTL that states WCTL will assist in the management of all work-related injuries.

Responsibilities:

WCTL shall oversee the rehabilitation of employees injured on the job to facilitate their timely return to full duties.

Duties:

WCTL is responsible for completing the Modified Work forms to be signed by the employee and forwarded to WCB, the employee, and the company representative to ensure all details relevant to this case are known by all parties.

1. WCTL will review the diagnosis and treatment prescribed and will make recommendations to the medical community regarding same.

2. WCTL will arrange special tests and access to a specialist upon approval from Canadian Road Builders Inc.
3. WCTL will contact WCB to ensure the assigned Case Worker is notified regarding all important information and to seek agreement on the treatment path to be followed.
4. WCTL will provide a Case Worker to direct and control all ongoing activities and to provide the medical treatment necessary to return the injured employee to full pre-injury capability.
5. WCTL will maintain contact with all professional health care providers to ensure treatments are working and no undue complications have been observed. WCTL will maintain contact with the Safety Coordinator/Facilitator to ensure full company cooperation in the rehabilitation process. WCTL will also maintain contact with the injured employee to monitor his/her progress and to encourage his/her ongoing participation in the program.
6. WCTL will review all cases weekly with the consulting occupational physician.

1.2 Stay at Work Program and Return to Work

We will accommodate injured employees to stay at work on modified duties during their recovery to full duties. If they are on lost-time and away from work, we will also accommodate return to work at the earliest possible opportunity to participate in modified work. Injured workers that return to work as soon they can safely do so will have the best recovery from their injury. Long delays in return to work can create complications in a safe return such as reduced levels of work conditioning and proneness towards easy re-injury.

It is important to establish contact with worker as soon as they return to work. When the worker returns to work, let them know you are glad they are back. The recovered worker, the workers' supervisor and first aid attendant need to discuss the worker's current condition and any work restrictions.

Accommodating an injured worker for modified duties requires a match between the injured worker's physical abilities with either a shorter workday, less strenuous work, or both until the injured employee has recovered sufficiently to resume normal duties. This allows for the gradual improvement of the worker's physical condition and return to a full workload. Returning to work for a shorter workday or lighter duties means that the worker is back sooner. This preserves the behavioral pattern of getting up in the morning and going to work. Self-esteem also improves with the return to productivity. Staying at work provides the worker with an opportunity to stay at their regular pre-injury earnings.

Effective modified duties for staying at work, or early return to work, after an injury requires the:

- Worker's physician to be involved and provide consent to the modified work
- Worker not to be placed at risk of further injury
- Modified duties assist in the worker's recovery
- Work is meaningful and productive

Modified work initiatives, successfully implemented, will return injured workers to productive employment faster and with less chance of recurring injury and will substantially reduce wage loss payments. In the case of permanent disabilities, a successful program will ensure that the worker is assessed for a functional disability pension rather than a loss of earnings pension. The difference between a loss of function disability pension and a loss of earnings pension may be hundreds of thousands of dollars.

Some of the options for early return to work after an injury to be considered are as follows:

- Modified duties provide an opportunity for the injured worker to be assigned suitable and productive work that is less physically demanding that will not aggravate the existing injury or impede the recovery process. The workers' physician and WCB Claims Manager need to be consulted to ensure the proposed work is suitable.
- Graduated return to work that allows the injured worker to gradually return to pre-injury status through shortened workdays. This is usually done over a four-to-six-week period with the worker working two hours per day for the first week, four hours the next week, followed by six and then eight hours in the final week.
- On-the-job training that provides the injured worker with an opportunity to learn and develop new skills in an actual workplace. Prior to commencing a training arrangement, we will need to negotiate a written statement of the terms and conditions with the WCB. This statement will normally include the intended duration of the training on the job, the expectations of hiring the worker at the end, and the level and kind of WCB support to be provided (generally a 50-50 cost split basis for the first few months and a declining basis thereafter plus costs for necessary modification of equipment, facilities, etc.). The WCB provides relief of claims costs to employers participating in a retraining program sponsored by the WCB's Vocational Rehabilitation Department if a worker is re-injured during the re-training. This relief applies to both re-aggravation of an old injury and where an old injury is a significant factor in the occurrence of the new injury.

Refusal of Modified Work Offer

If an employee refuses to participate in the modified work program, their supervisor with assistance from the Safety Advisor will interview the employee and record the reasons for not accepting the offer. The Safety Advisor will then inform the WCB.

Follow-up after Return to Work

When the employee reports for modified work, their supervisor and the Safety Advisor will monitor the employee's progress and address any concerns immediately.

When the employee receives written medical clearance to return to regular duties, the company will make all reasonable efforts to accommodate all employees injured on the job to return to work in keeping with restrictions by nature of the injury and/or doctor's restrictions. The goal is to assist the injured employee to full rehabilitation.

1.3 Contested Claims

There may be times when an injury claim for compensation should be investigated further and contested because it:

1. Does not appear to be arising out of the normal course of employment,
2. Was not reported at the time of injury, or
3. Is an aggravation/complication of an injury received while working for a previous employer.

Examine carefully any injury claim where there are discrepancies regarding how the accident occurred and how/when the injury happened, and any situation where the employee did not immediately report the injury. Review the facts carefully, and if there is good reason to believe that it is an illegitimate claim, it can be contested.

The claim can be contested at two significant junctures in the claims management process:

1. At the time the Employer's Report of Injury or Occupational Disease is sent to the WCB: Disagreeing with a worker's claim for compensation cannot interfere with the reporting process. The injury report forms must be submitted within the allotted timeframe (72 hours). In these situations, the process to contest the claim will be as follows:
 - a. Complete the Employer's Report of Injury or Occupational Disease as required with particular attention to details ensuring everything is correct and as reported by the injured personnel.
 - b. Write clearly on the front of the Employer's Report of Injury or Occupational Disease in large letters "CONTESTED". Submit a letter with the Employer's Report of Injury or Occupational Disease with any additional information about the claim and request a "Decision Letter".
2. After the Employer's Report of Injury or Occupational Disease has been submitted and the claims process has been initiated: A claim can be contested any time it is active. If new information about the injury claim becomes available that creates doubts about the claim, the course of action will be to:
 - a. Call the WCB and contact a Claims Adjudicator.
 - b. Discuss with the Claims Adjudicator the new facts about the injury claim that have caused the doubts. At this time, it is helpful to refer to the Claim Number if it is known.
 - c. Ask the Adjudicator for the claim to be reviewed and the new facts to be considered in the review.
 - d. Follow-up the phone call with a letter with the new information and request that a "Decision Letter" be issued by WCB.

It is important to deal strictly in facts, and not hearsay. Provide details to the Claims Adjudicator regarding doubts about the claim. For example, if it comes to your attention that the injured person is working at another job while collecting compensation, let the adjudicator know so WCB can investigate further. If you are going to contest a claim, be sure of the facts, and try to have it resolved sooner rather than later. Keep in mind that in the absence of information

provided by the employer, the WCB will adjudicate based on information provided by the worker.

Our claims administrator will request a site visit by the WCB claims adjudicator if it is believed that there is a problem with a claim. An adjudicator's wrong impressions regarding the specifics of an injury occurrence, or of the employer's work activities, may be able to be cleared up with a site visit. Site visits can also be valuable for demonstrating to an adjudicator the proposed activities for a worker participating in an early return to work opportunity.

Appealing Injury Claim Decisions

A "Decision Letter" will be issued informing the employer and worker on whether or not the claim is being accepted and why. Either party is entitled to appeal the decision. The WCB usually encloses with the decision letter their document entitled "Claims appeal guide for employers". Information on appealing claims can also be found at the following website:

<https://wcb.ab.ca/claims/review-and-appeals/>

This information should be consulted if we are considering appealing a claim. Advice from the Employer's Advisors Office should also be obtained. Contact information can be found in the following websites:

<http://www.labour.gov.bc.ca/eao/claims>

Claims Cost Controls

We will review our claims cost statements and Experience Rating Assessment (ERA) statements on a regular basis to:

- Determine the overall costs of injury claims and how these claims costs affect the payroll assessment rate (ERA)
- Identify claims that have costs incorrectly assessed against the claim
- Identify high-cost claims
- Review the opportunity to apply for cost relief whenever possible
- Compare our claims cost performance to the industry, i.e., discount or surcharge

Work Comp Tech Ltd. Services

The services of Work Comp Tech Ltd. (WCTL) have been secured to assist with injury claims management and claims cost control. They provide services to each Division assisting the Safety Advisors, Division and Area Managers, in administering our injury claims management and modified work program.

2. ERGONOMICS

Policy

We are committed to preventing and managing musculoskeletal injuries (MSI) and addressing ergonomic factors that contribute to MSI. The necessary steps to prevent and manage MSI will be incorporated into everyday operations. The Superintendents, in cooperation with Safety Advisors, will coordinate any required ergonomics initiatives necessary to address MSI concerns generated by injury trends, worker complaints, safety committee recommendations and/or regulatory requirements.

Responsibilities

Division/Operations Manager is responsible for ensuring that Superintendents recognize and address ergonomic issues in order to prevent MSI.

Superintendent has overall responsibility for ensuring that ergonomic issues are identified, and the correct response to the issues are initiated. Superintendents must ensure that supervisory personnel support the program.

Supervisor is responsible for ensuring that Site/Crew Supervisors respond to ergonomic issues and implement effective actions to address ergonomic issues in order to prevent MSI.

Operations Manager/Superintendent are also responsible for working with the Safety Advisor's to ensure MSI Risk Assessments and/or physical demands assessments are completed as required to support the program.

Workers are responsible for actively supporting company efforts to reduce MSI and implement effective ergonomic solutions. Workers are also responsible for informing their supervisor in a timely manner of any ergonomic issues that affect their health and well-being.

Safety Advisors will support operations personnel's efforts to implement and maintain an effective ergonomics program. This will include locating resources and information to keep the program effective. Safety Advisors will regularly check to ensure that ergonomic issues are being addressed and MSI prevention efforts are effective, including tracking and reporting on occurrences of MSI. Safety Advisor will assist operations personnel as required to complete MSI Risk Assessments and/or physical demands assessments. The Safety Advisor is also responsible for keeping the Division/Operations Manager, and General Manager apprised of the implementation and effectiveness of the program.

Definition of Ergonomics and MSI

Ergonomics and MSI risk reduction strategies are relatively new to work in road construction and allied construction processes, even though regulatory requirements requiring organizations to address ergonomics were introduced in AB in the early 2000's. The heavy manual labour component involved in construction tasks presents few opportunities to apply practical ergonomics solutions for MSI prevention; therefore, for some of our operations ergonomics and MSI may be relatively new concepts. The following definitions are offered to help clarify what these terms mean and the resulting expectations for maintaining an effective ergonomics program:

Ergonomics is the study of the problems of people in adjusting to their environment; science that seeks to adapt work or working conditions to suit the worker. The aim of the discipline is the evaluation and design of facilities, environments, jobs, training methods and equipment to match the capabilities of users and workers, and to reduce the potential for fatigue, error or unsafe acts

OH&S Alberta Definition

Musculoskeletal injury (MSI) is an injury or disorder of the muscles, tendons, ligaments, joints, nerves, blood vessels, or related soft tissue including sprain, strain, and inflammation, that may be caused or aggravated by work, including overexertion injuries and overuse injuries.

Risk Identification and Assessment

The main focus for identifying risk factors will be tasks that have a high risk of MSI. Each operating unit of the company must review annually workplace records for evidence of MSI, including first aid records and claims history. The records will be examined for a sufficient period of time to ensure that any occurrences are identified, and where possible, that any patterns for MSI occurrences are clear. Division Managers and Superintendents will work with Safety Advisors to complete the review process and identify our tasks/jobs with high MSI risks. The MSI risk review process should also include the following information sources:

- Interviews with workers and supervisors
- Industry trends (road construction, ready mix, aggregates and civil construction)
- MSI statistics – internal and industry group
- Input from the Joint Occupational Health and Safety Committee
- Consultation with the CRB General Manager

Risk factors will also be identified through direct observation of the work activities. For this purpose the MSI Risk Assessment worksheet can be used. It will help cover a number of factors to consider that are recognized as valid assessment criteria. Generally, there will be more than one risk factor identified for a given work activity. This may occur because of the nature of the activity but may also be attributable to the personal characteristics of different workers doing the job. Our MSI risk identification and assessment protocol as found in the MSI Risk Assessment worksheet is consistent with the legal requirements. It includes consideration of:

- Physical demands of the work activities
- Environmental conditions
- Organization of work
- Aspects of the layout and condition of the workplace or workstation
- Characteristics of objects handled

Involvement of Safety Committees

The Joint Occupational Health & Safety Committee will be consulted on a regular basis to ensure that our ergonomic efforts are sufficient. They may be involved in the identification and assessment of risks, assessment of worker education and/or training needs, and any required recommendations for implementation of effective MSI risk reduction strategies.

Implementing Controls

The implementation of ergonomic controls to reduce MSI risks will follow the same general hazard control approach as outlined in Section 2 – Hazard Identification and Control, Hazard Reduction and Control Strategies:

1. Engineering & purchasing controls
2. Administrative controls
3. Personal protective equipment and clothing

It is anticipated that the majority of the MSI risk reduction strategies will focus on administrative controls. The nature of our work will limit the practical opportunity to apply engineering and purchasing solutions. The use of personal protective equipment and clothing will also have limited applications. Therefore, it is important that effective MSI risk reduction be generated through safe work practices/procedures and work education/training.

Safe Practices/Procedures

Our HSE Program contains numerous Safe Work Practice and Procedures that take into consideration MSI risks. Some, such as the Safe Work Practice on safe lifting, address specific MSI risks and establish safe work methods for the task(s). New Safe Work Practices and Procedures will be developed whenever a need is identified. The Division Managers, Safety Advisor and General Manager will work in consultation with local safety committees to ensure that new practices and procedures are developed when required.

Tool Selection and Ergonomic Design Considerations

Consideration will be given to the ergonomic design of hand and power tools in an effort to reduce fatigue and injury. The purchase of new and replacement hand and power tools with a good ergonomic design will be given preference over power and hand tools with poor ergonomic design. Application, duration of use and the capacities of the person(s) using the tools will be taken into consideration. Personnel are encouraged to select for their use power and hand tools that have good ergonomic design.

Training/Education

Training and education of our workforce on MSI risk and risk reduction strategies will have several components:

1. New/Young Worker HSE/HR Orientation training: Every new/young worker must complete orientation training when they start work with our company. The training includes information on awareness of MSI risks and control methods. The signs and symptoms and the need for early intervention is also included in the training.
2. Employee (Skills) Training: MSI risks, controls and safe work procedures will be incorporated into employee skills training. Employees being (re)trained to do new tasks will be educated and trained to be aware of MSI risks and the correct means to cope with the risks.

4. **MSI Risk Education:** Supervisors will provide workers they supervise with on-going MSI risk and risk reduction education through the Toolbox Safety Talk process. There are numerous Toolbox Safety Talks that address MSI risk reduction currently available for delivery to crews that include the following topics:

- a. Avoiding Back Injury at Work
- b. Avoiding Heat Stress
- c. Back Safety – Proper Lifting Procedures
- d. Chains Saws – Kick-Back Hazard
- e. Ergonomics – Safety
- f. Hand-Held Grinders
- g. Hand Injuries
- h. Heat Stress – Hydration
- i. Hearing Protection
- j. Heat – Exhaustion
- k. Heat – Stroke
- l. Heat Stress
- m. Housekeeping
- n. Ladder Safety
- o. Ladders – Safe Use
- p. Lifting and Carrying (Back) Safety
- q. Load & Unload Equipment Safely
- r. Mobile Equipment – 3 Points of Contact
- s. Mounting/Dismounting Heavy Equipment
- t. Pinch Points
- u. Return to Work Program
- v. Shoveling Safe Work Procedure
- w. Transferring a Trailer (Hand Work)

5. **Safety Committees:** The committees are expected to request training on the recognition of MSI risks, risk assessment and ergonomic principals, if the Committee believes the training is needed in order for the Committee to fulfill their role in the MSI risk reduction process. Requests for training should be directed to the Safety Advisor.

Preventing MSI – Stretch and Flex Program

Most MSI injuries can be prevented through proper work techniques and body conditioning. The stretch and flex program will be implemented and followed by all personnel in our manufacturing facility. This is a proven method of preventing soft tissue injuries when combined with proper manual materials handling and lifting techniques.

Treatment of MSI

There is a risk of MSI due to the physical nature of our work in road construction. Our office personnel may also experience MSI risks if ergonomic principles are not applied to office workstations. Therefore, actions must be taken that anticipates the need to assist employees in the early intervention and treatment of MSIs.

Early intervention is the key to minimizing the impact and severity of MSI. It is important for all employees, supervisors and managers to recognize the early signs and symptoms of MSI. They must be prepared to act upon this knowledge and intervene. Reporting injuries, even minor injuries, such as muscle soreness or temporary restrictions in range of motion to the first aid attendant is incredibly important. First aid attendants must be familiar with the signs and symptoms of MSI and advise the worker and the worker's supervisor so that early intervention is possible. This will prevent more severe injuries from developing. Early intervention can prevent permanent disability and loss of quality of life for our employees.

All potential MSI are to be reported to Work Comp Tech Ltd. through the established reporting lines. The Work Comp Tech rehabilitation coordinator, in consultation with the employee, the employee's physician and the WCB, will develop and implement a personalized plan to assist the employee in dealing with the MSI and return to work.

3. Workplace Harassment and Violence Procedure

What is workplace harassment or violence?

Workplace harassment is behavior intended to intimidate, offend, degrade or humiliate a particular person or group. Workplace violence means the "threatened, attempted or actual conduct of a person that causes or is likely to cause physical harm. It may take the form of posters, picture or graffiti. It may involve touching, striking, pinching or any unwelcome physical contact.

Certain conduct which might be tolerated socially could constitute harassment or violence in the workplace, such conduct is not tolerated. Harassment and violence can consist of a single serious incident or a series of incidents over a period of time. Harassment and violence in the workplace is against the law and could result in criminal charges depending on the offense.

The following examples may constitute harassment or violence when they are offensive to an employee, regardless of any "innocent intent" on the part of the offender:

- The public display of pornography, ranging from material that might be considered mildly erotic, through to material that is sexually explicit;
- Continued use of jokes containing sexual innuendoes in an attempt to humiliate or embarrass another person;
- Intrusive enquiries (either verbal or written) into an employee's private life or in reference to their sexuality or physical appearance;
- Persistent requests for dates, drinks, etc., which have been repeatedly rebuffed, and
- Persistent staring or leering at a person or at parts of their body.
- Sexually offensive telephone calls;
- Public displays of nudity - commonly referred to as flashing;

- Being threatened or intimidated by a fellow workers or supervisor.
- Fighting, Shoving or verbal threats of any kind.

What you can do;

- Do not ignore harassment or violence, thinking it will go away (ignoring the behavior could be taken for tacit consent).
- Make it clear to the individual doing the harassing or creating a hostile workplace that such behavior is offensive and unacceptable.
- Warn others who may be at risk.
- Keep a record of when the alleged incident(s) occurred the nature of the behavior, and the names of witnesses, if any.
- Make a formal complaint.

Responsibilities

Employer must, as far as reasonably practicable, ensure their workers are not subject to or participate in harassment or violence at the work site. All incidents of harassment and violence will be investigated, and corrective action taken if required.

Supervisors must, as far as, reasonably practicable, ensure workers under their supervision are not subject to harassment or violence on the work site.

Workers also have a responsibility and must refrain from causing or participating in harassment. They must know and understand the Policy and Procedures for reporting.

Safety Advisors will review the policy and procedure every three years or if an incident of harassment occurs this will trigger an automatic review of both.

Making a complaint

If you believe you have been harassed or are a victim of workplace violence at work, you should immediately contact one of the following individuals (whomever you feel most comfortable with) to express your complaint:

- Your Supervisor
- Manager, Human Resources Dept. 780-962-7800
- Safety Manager; Samantha Dehod 780-908-1194

Investigative Process

An individual who is approached with a complaint may conduct an investigation. In conjunction with the Manager and Human Resources, such individual will make recommendations to the appropriate member of senior management based on their findings and, similarly, will be entitled to dismiss a complaint which is without merit.

Time Schedule

All complaints will be investigated within thirty calendar days at which time a recommendation will be made to continue the review process or dismiss the complaint.

Review Process

The complaint will be reviewed by the complainant's Manager (this person will be disqualified if they are the party accused of harassment), Human Resources, and the employee investigating the complaint. Additional employees may be involved in the review depending on the circumstances.

Appeal Process

The employee, against whom the complaint was made may appeal the decision stemming from the review by filing a letter of appeal with the Manager of Human Resources, within seven calendar days of being advised of the outcome of the review.

Confidentiality

All Harassment and workplace violence complaints will be dealt with promptly and empathetically. Every effort will be made to protect the rights of any individual accused of harassment and violence, including their right to be informed of the complaint and their right of response. The confidentiality of the complainant will be maintained except where disclosure of their name is necessary for purposes of investigating the complaint or taking disciplinary action in relation to the complaint. All employees should understand that matters regarding harassment and violence in the workplace may be subject to adjudication before the courts, a Human Rights hearing, or a labor arbitrator.

An employee, who has in good faith, filed a complaint of harassment, will not be subject to any retaliation or reprisal by the Company.

Support

Canadian Road Builders Inc. maintains an employee assistance program which provides help and information to employees who suffer from substance abuse, harassment and other personal or emotional problems. However, it is the responsibility of each employee to seek assistance before performance problems lead to disciplinary action.

It is a free and confidential program for all employees and family members of Canadian Road Builders Inc. employees. (Shepell FGI 1-800-387-4765)

Note

In addition to the above, employees are entitled to seek redress in respect of harassment and violence under provincial human rights legislation. Employees who believe they have been harassed or victim to workplace violence are entitled to initiate civil action and/or, should the circumstances warrant, file a charge of assault with the police.

4. Silica Code of Practice

Purpose

Canadian Road Builders Inc. is committed to providing a safe and healthy workplace to our employees, recognizing the right of workers to work in a safe and healthy work environment and ensuring that's activities do not adversely affect the health and safety of any other persons. This practice has been developed to ensure every reasonable precaution is taken to protect our employee and others, from the adverse health effects associated with exposure to silica from our operations.

Scope

This policy shall apply to all company employees and subcontractors working for or on Canadian Road Builders Inc. work sites.

Policy

Due to the risk posed by penetrable silica, it is critical that all personnel involved in activities that could potentially create silica dust take specific actions to ensure that, as much as practicable, a hazard is not created. In recognition of this, the following (Silica related) responsibilities have been established and must be adhered to:

Managers

- Regularly evaluating new equipment and technologies that become available, as able/appropriate, purchasing the “best available” equipment/technologies (within WGS’s capabilities). Equipment/technologies with (silica) dust suppression and/or capture technologies will generally be given preference over equipment/technologies that lack such.
- Ensuring project and/or task specific Exposure Control Plans (ECPs) are developed, communicated and effectively implemented as appropriate.

Supervisors

- Obtaining a copy of the project/task specific ECPs (and/or other similar such information) and ensuring such are made available at each work site.
- Ensuring that all the tools, equipment, PPE and materials (including water) necessary to implement the ECP is available (and in good working order) prior to allowing work activities to commence.
- Ensuring that all workers (under the supervisor’s direction and control) have received the necessary education and training. As appropriate, each supervisor must ensure that workers are available to “demonstrate competency” for identified tasks.
- Ensuring that workers adhere to the project/task specific ECP, including PPE and personal hygiene (i.e. including be clean shaven where the respirator seals to the user’s face) requirements.

- Coordinating work activities with the Owner/Prime Contractor as required, and/or otherwise implementing the controls necessary to protect others (i.e. erecting of barricades and signage) who could be adversely effected by CRB's acts (or omissions).

Employee (Workers)

- Knowing the hazards of silica dust exposure
- Using the assigned protective equipment in an effective and safe manner.
- Working in accordance with the project/task specific ECP.
- Reporting (immediately) to their supervisor, any hazards (i.e. unsafe conditions, unsafe acts, improperly operating equipment, etc.). Safety Advisor
- Implementing a suitable respirable silica exposure monitoring program, or otherwise ensuring representative exposure monitoring results are available. The purpose of the program will ensure that (over time) WGS has quantifiable silica exposure data available for all regularly occurring, as well as reasonably foreseeable, work activities.
- Maintaining applicable records (i.e. exposure sampling, inspections, respirator fit tests, training records, etc.) in accordance with record retention procedures/practices and OHS regulations.
- Ensure Joint Work Health & Safety Committee will conduct a review of this Policy, as well as: (1) project/task specific ECP's, (2) available exposure monitoring data, (3) Industry/Regulatory information, and (4) new/emerging equipment/technologies on a regular (i.e. annual) basis.

Exposure Limits/Considerations:

The Alberta Occupational Health & Safety Code lists an occupational exposure limit (OEL) for respirable crystalline silica (including quartz) of 0.025 milligrams per cubic metre (mg/m³). This is a concentration to which nearly all workers could be exposed for eight hours a day, five days a week, without adverse health effects. However, as a suspected carcinogen, crystalline silica is also an ALARA substance, and exposures must be reduced to levels As Low as Reasonably Achievable below the OEL

Silica Exposures

Some of the activities performed on CRB Projects result in the creation/release of silica dust, thus exposing our employees. These activities include, but are not necessarily limited to:

- Sweeping
- Saw-cutting of material containing silica
- Grinding asphalt/concrete
- Aggregate truck loading/unloading activities.

Health Assessments

Workers hired in areas where silica exposure is likely must take a pre-employment medical examination within 30 days of hiring and every 2 yrs thereafter. The health assessment must include a chest x-ray and spirogram (pulmonary function test).

All health assessments are covered by Canadian Road Builders Inc. Results must be kept of employee's health assessments for a minimum of 30 yrs. Records are maintained in the employees personnel file and are kept confidentially with contracted medical (Surehire) company.

Abnormal results from chest x-ray and spirogram are communicated to the worker from the Surehire and followed up on confidentially by CRB Safety personnel

Each employee must take an annual respiratory fit test and an initial fit test within 30 days of hiring. Employees must take additional fit tests if facial characterizes change form weight changes other considerations. Employees must be clean shaven for respiratory fit testing.

Training

During orientation every worker potentially exposed to silica will be informed of the hazards of silica and control measures to reduce exposure to silica. This policy on silica will be reviewed with employees exposed to silica.

Monitoring

CRB will monitor for silica with personal silica monitoring equipment and report the results to the workers monitored and JWHS committee as they become available Health Hazards Associated with Silica

Exposure

The health hazards of silica come from breathing in the dust, silica dust is very small, and is not visible to the human eye. If crystalline silica becomes airborne through industrial activities, exposures to fine crystalline silica dust (specifically, exposure to the size fraction is considered breathable) can lead to a disabling, sometimes fatal disease called silicosis. The fine particles are deposited in the lungs, causing thickening and scarring of the lung tissue. The scar tissue restricts the lungs' ability to extract oxygen from the air. This damage is permanent, but the symptoms of the diseases may not appear for many years.

A worker may develop any of three types of silicosis, depending on the concentration of silica dust and the duration of the exposure:

- Chronic Silicosis: Develops after 10 or more years of exposure to crystalline silica and relatively low concentrations.
- Accelerated Silicosis: Develops 5 to 10 years after initial exposure to crystalline silica at high concentrations.
- acute Silicosis: Develops within weeks, or 4 to 5 years, after exposure to very high concentrations of crystalline silica.

Initially, workers with silicosis may have no symptoms; however, as the disease progresses, workers may experience:

- Shortness of Breath.
- Severe Cough.

- Weakness.

These symptoms can worsen over time and lead to death. Exposure to silica has also been linked to other diseases, including bronchitis, tuberculosis, and lung cancer.

The safety information in this policy does not take precedence over the Occupational Health & Safety Act, Regulations, and Code. All employees should be familiar with the OH&S Act, Regulation, and Code

5. Crisis Management Team

Purpose

A crisis is defined as any incident that can focus negative attention on a company and have an adverse effect on its overall financial condition, its relationships with its audiences, and/or reputation within the marketplace. The purpose of this crisis management plan is to provide a systematic approach to managing a crisis in an organized fashion, without causing a major disruption to normal activities.

This Canadian Road Builders Inc. crisis management plan has been designed to help maintain the company's credibility and positive image with all of its identified audiences in the face of adversity.

All the identified audiences, both internal and external, should feel we were well-organized and handled the emergency in a professional manner. Every employee of CRBI needs to be able to respond very quickly to a crisis situation, as a crisis does not allow for a "time out" to let you think through the situation.

CRBI will inform all parties of their responsibilities in a crisis. This procedure will provide a basis for the implementation of a Crisis Management Team within Canadian Road Builders Inc. operations.

Special Terms

Crisis Management Team

This is defined as a group of persons with the experience, expertise, resources and skill to lead the organization through a crisis that occurs outside the normal operating parameters of the organization.

Crisis

An event that is beyond the normal controls that are in place within the organization on a day-to-day basis.

Disaster

- An event that occurs that is catastrophic in nature and may result from any of the following.
- Natural or weather-related causes
- A terrorist threat
- A regional situation that impacts the operation
- An internal event that results in high impact to the Community or the Canadian Road builders Inc. workforce
- An event that occurs that is beyond the capability of the organization to manage with the resources available under normal condition

Demonstration

An unforeseen public demonstration or work stoppage that results in an adverse condition on the job site

Rule of the Crisis Unit

Confidentiality: Except for individuals designated by name, do not divulge any information beyond the crisis unit before, during or after crisis

Respect: Restrict yourself to the role defined by the Crisis Management plan. Don't take telephone calls during situation reviews

Priority: Each member of the unit must devote their time exclusively to managing the current crisis.

Sharing Information: All information should be recorded

Punctuality: Respect the times of meetings, including situation reviews.

Approving Decisions: All action and decisions are approved by the head of the Crisis Unit

Reflection and Anticipation: No hasty judgements, distinguish between fact and opinion, keep things in perspective

Procedures

Media Relations

If the media should arrive on a company before the company has prepared a statement, the senior Canadian Road Builders Inc. representative at the scene is authorized to release one of the following statements:

1. My name is (Name) and I am (Title) with (Division). Please stay in this safety area so we can do our job and take care of the situation. I need to return to the site, but either (our company Spokesperson) or I/foreman will be back to update you when more information is available. Thanks you.
2. "We are currently dealing with the situation to ensure the safety of personnel, property, the public and the environment. A more comprehensive statement will be released as soon as more factual information has been determined."

DO NOT SPECULATE ON THE CAUSE OF THE SITUATION OR PROVIDE THE MEDIA WITH ANY TYPE OF STATEMENT THAT IS "OFF THE RECORD."

Before admitting the media onto Canadian Road Builders Inc. supervised property, the senior Canadian Road Builders Inc. representative shall ensure that the area is absolutely safe, and that admittance will not hamper emergency services or investigations. The media shall always be accompanied while on Canadian Road Builders Inc. supervised property.

Following an official investigation, if employees wish to speak to the media, interviews should be coordinated through the official company spokesperson. The employee should be aware of key messages the company wishes to advance as a result of that interview.

If an official investigation results in recommendations or changes to company policy, the company should consider a news conference to explain to the media the results of the investigation and to be told

that changes in policy and procedures will be made. If those changes do not affect security of the company, they should also be passed on to the media.

Team Development

The Crisis Management Team (CMT), in many cases, is in place in most operations given that the organization has an organizational structure or so we believe. Commonly we think of the leader of the organization making all decisions as they affect the organization in a crisis.

For most organizations this misconception leads to the inability to properly manage a crisis when it does occur resulting in loss of revenue, loss of property and in some cases loss of life.

In reality the leader of the organization requires information, resources and input to make the proper decision at the time of the incident.

For this reason, a formal team structure is required to provide resources to the organization and management as they are required to mitigate the crisis situation.

The Team may consist of but not be limited to the following positions.

- President and/or General Manager
- Division Managers
- Safety Manager
- Division Superintendents
- Field Supervisors/ foremen
- Safety Department
- Stenographic support Optional Members of the Team include the following dependent on the event conditions.
- Representation by Police, Fire or Medical Services

Team Member Responsibilities

1. President and/or General Manager

The President and General Manager will be considered the Crisis Management Team Manager. The following would be considered responsibilities in the event of a Crisis situation.

- Leadership and control of the Crisis Management Team.
- Coordination of information inputs from all Departments.
- Direction or presentation of media information and or releases.
- Determination of the duration and need for team activities.
- Provide direction to the team to determine the desired outcome for the crisis situation.
- Decision authority for the application of external resources, expenditures and contacts.
- Implementation of business resumption plans.
- Designate an individual as Public Information Officer, if necessary.

2. Division Managers

The Division Managers that is part of the Crisis management team will have the responsibility to manage the following and report the activities to the Crisis Team Manager

- Responsible to manage all aspects of the operation in a crisis situation
- Responsible for implementation of emergency shut down procedures
- Responsible for all on-site resources in the event of an emergency
- Responsible for delegation of tasks to Superintendents and Supervisors/ foremen in the event of an emergency or crisis
- Responsible for the development of procedures to be used in the event of a crisis situation at the work site as they relate to the operation and emergency conditions that may exist with the facility
- Responsible to coordinate replacement staff in the event of a crisis that would cause incapacitation to a crew or a number of the crew

3. Safety Manager

The Safety Manager will act as part of the Crisis Management Team where activities relate to employee concerns or needs and is required to interpret relevant legislation for the Crisis Management Team while it is operational. The Safety Manager will manage the following responsibilities.

- Responsible for the short-term implementation of Critical Incident Stress Management resources with the assistance of Human Resources, for the benefit of personnel who require assistance after exposure to a crisis.
- Responsible for the development of procedures to be used in the event of a crisis situation at the work site as they relate to Emergency Procedures
- Responsible for liaison with Emergency Services. This includes Fire, Police and Ambulance that are required for the purpose of the crisis situation
- Responsible in conjunction with the Human Resources Generalist to facilitate Critical Incident Stress Management procedure implementation
- Responsible to implement procedures related to Security for the job site during a crisis situation

4. Human Recourses

- Draw up list of staff involved
- Makes sure that the families of the staff involved are taken care of, if required
- Activate the psychological support unit for staff involved directly and for members of the Crisis Unit
- Disseminated instruction to remind staff of the need for confidentiality
- Drafts the talking points with the Colas's HR department, if required
- Organizes the dissemination of information via the most suitable channels and premises
- Reminds people of the psychological assistance helpline
- Takes care of communication with relevant staff bodies

5. Stenographic Support

The need to ensure that proper record keeping is maintained, while the incident is ongoing, is paramount. The Stenographic Support person will be responsible for the following.

- Maintaining an ongoing log of activity during the time the CMT is in operation
- Assisting the Public Information Officer with the preparation of Media Releases
- Preparation of a final summary of the activities of the Crisis Management Team
- Responsible for the development of templates to be used for the purpose of record keeping of a crisis situation
- Responsible for the coordination of kits to be used by team members in the event they are required to evacuate the job site

Procedure Development and Plans

In many cases organizations feel that they are prepared to manage a Crisis based on the plans they have in place for day-to-day operations.

Most find that when tested these plans are not complete enough to stand the test of an actual crisis.

Each department must ensure that plans and procedures are developed to ensure that continued operation of their departments or the management of their department's crisis.

Plans and procedures may include but not be limited to the following.

- Development of business resumption plans for use after a crisis
- Emergency shut down contingency plans for the job site
- Emergency staffing plans
- Procedures for the securing of the job site

Crisis Management Centre

The Crisis Management Centre is a location at the Main Acheson office: 6120 Acheson Road, Acheson Ab T7X6B3. Alternate methods of communication: Microsoft Team Application or Email.

This facility, room or site location should it be required should meet the following minimum requirements.

- Ability to Secure from entry
- Have a method, such as computer access, a flip chart or overhead projector to show status of operations to all team members while they manage their respective areas. This is used when updates are solicited by the Team Manager for items such as press release
- Have the ability of emergency power and/or lighting
- Have the ability to source telephone or Cellular phones
- Have pre-made kits for each of the participants that allow for them to carry on the responsibilities in the event that Crisis Centre must be located off site

Initial Actions

- Remind staff of their confidentiality obligations.
- Inform reception and the switchboard:
 - Instruction on how to handle calls concerning event

- Communication statement: “A type of incident took place today XX/XX/XXXX. We are working with the appropriate authorities to determine the exact circumstances of the incident and are taking every necessary measure. We’ll get back to you as soon as we can.”

Team Member Training

The elements of this procedure have been designed in a similar but less extensive manner, as would a municipality or other organization that may be subject to a Disaster or Crisis situation.

There is a wide range of training that is available for the members of a Crisis Management Team. This training may include but not be limited to the following.

- Dealing with the media
- Disaster Services Public Information Officer
- Emergency Site Management

Internal Exercise of the plans developed for the management of crisis situations at the facilities/work site

One effective method to train the members of the Crisis management team is to provide scenario-based training. This is completed internally by providing situations or scenarios that allow the team member to act as they would in a given set of circumstances. These may include.

- Weather related situations where the need for site evacuation exists
- Threats to the physical operation such as bomb threat, terrorism or any other even that would cause an impact on the operations
- A fatality at the workplace
- A train derailment that affects the job site
- A release of a toxic substances from a truck or vehicle that affects the job site

Much of this style of training will prompt each department as to what specific procedures are required for those departments.

Crisis Team Exercise

The Team, on an annual basis will review the process and if possible, determine preparedness.

This can be facilitated internally or with the assistance of an organization externally which would evaluate and make recommendation for improvement of the Crisis Management Team operations.

Existing Crisis Mode

Before demobilising the crisis unit, the Crisis team gathers the participants to canvas their views on:

The alert

The functioning of the crisis unit

The key aspects (positive points and areas for improvement)

Demobilisation

The Crisis Manager must:

- Oversee the actions to be taken in relation to the normal functioning of the company (e.g. repairs, insurance and legal follow-up)
- Thank the participants for their contributions before officially declaring that the alert is over, and the crisis unit is being stood down.
- Organize:
 - The collection and saving of all crisis-related documents and the compiling of a file (correspondence, communication documents, decisions taken, ect.)

Lessons Learned

Lesson learned (or a follow-up debriefing) should be organized in the month following the demobilisation of the unit in order to learn the lessons from the crisis.

The lessons learned are then used to take corrective action and optimise the crisis arrangements.

Crisis Phonebook:

Internal

Rick Taskey (President) Day: 780-459-6611 Cell: 780-887-6380 Hm: 780-459-2942

Nick Bucyk (General Manager) Cell 780-289-9000

Samantha Dehod (Safety Manager) Cell 780-908-1194

Fionna Tollovsen (Human Resources) Cell: 780-721-6344

External

Emergency Contact details:

- 911: Ambulance/police/fire service
- 411: General Information
- 811: Health Link

Authorities

- RCMP General Enquires: 1-613-993-7267
- Environmental reporting: 1-800-222-6514
- Ministry of Labour Safety Contact Center: 1-877-202-0008 or Alberta 1-800-232-7215
- Poison Control Center: 1-800-332-1414 or Alberta 1-403-592-2036 or BC 1-604-682-5050
- CANUTEC: 1-888-226-8832 or *666
- EMA Alberta (Dangerous Goods) 1-800-272-9600
- Alberta Emergency Management Agency: 310-0000 (only in Alberta) or BC 1-604-586-4390

- S.T.A.R.S. 1-888-888-4567 or #4567 on Cellular

Utility Companies Alberta:

- Power Company EPCOR 1-780-412-4500 or 310-WIRE
- Gas Company: ATCO 1-780-420-5585 or 1-800-511-3447

Crisis Procedures

First Hour Checklist

EMPLOYEE IN CHARGE ON-SITE at the time will:

- Call 9-1-1 (if required) and establish a command center. (Control duties may be handed off as more senior or qualified personnel arrive on site)
- Contact immediate supervisor and ensure safety coordinator contact.
- Initiate site control and make certain that all employees are accounted for.
- If the site will be shut down, tell workers when they are to report back for duty and that stress debriefing will be available (if applicable). Employees are also to direct all information request from outside groups to you. Advise them to then contact their families to let them know they are OK. Also instruct all employees that there is to be **no** pictures taken, phone calls made or social media contact while on site, unless approved by the person in charge.
- Keep selected individuals on site to help with the incident.
- Do not move anything that could be classified as evidence.
- Ensure telephone coverage at the site and restrict the use of two-way radios.
- Notify the crisis management team leader (see “**Crisis Phonebook**”).
- Post workers to restrict entry to the site. Only those authorized will be permitted entry and identification must be shown.
- Select a temporary spokesperson to issue a buy-time statement if the media arrives before the company spokesperson. (See below)

What to say if the media arrives;

(*Note: Make sure that you are facing the scene and do not allow the media to turn you around, so they cannot take their pictures of you in front of it.)

“My name is (____) and I am (title) with Canadian Road Builders Inc.. The incident has just happened, and I am not prepared to answer any questions at this time. Please stay in this safety area, so we can do our job and take care of the situation. I need to return to the site, but (spokesperson) or I will be back at (time) with an update. Thank you”.

IMPORTANT: Do not take any questions at this time. If badgered, simply state that you need to get back to the site but will have more information at the stated time.

In the event of a serious Injury

1. Determine the extent and nature of the injuries, then call 911.
2. Try to send a company employee with the injured worker to update the status of the worker and to be there to meet the family once they arrive at the facility.
3. Once the facility location has been confirmed, send a taxi/car to the spouse/family house/place of business.
4. The senior company representative on site, or designated spokesperson, will make the decision on who is to contact the family. Give no details if asked and simply explain that we are waiting to hear from the doctors of the extent of any injuries.
5. Advise the family that a taxi/car will be arriving shortly to transport them to the medical facility. Discourage anyone from driving themselves; though this cannot be stopped if they choose to do so.
6. If necessary, send a family liaison to the injured worker's home to lend assistance. This may include finding someone to watch children or be with other family members.
7. Assign an employee to be the liaison between the family and company. The company must ensure the family's needs are being met.

NOTE:

If the injury involves a non-employee, the authorities should be consulted about the notification procedures (in most cases they will handle them).

Contact our insurance company and legal counsel as soon as possible

Bomb threat

Bombs threats can be made by pranksters, political terrorist, criminal extortionists and disgruntled employees. **ALL THREATS MUST BE TAKEN SERIOUSLY.**

If the threat comes on a note, do your best not to handle it as it might have fingerprints on it.

If the threat comes by way of phone call;

1. Try to keep the caller on the line as long as possible. If possible, ask the following questions:
 - When will the bomb go off?
 - Where is the bomb located?
 - What type of bomb is it?
 - How is the bomb activated?
 - Why are you doing this?
2. Take note of the following:
 - Time of the call?
 - Exact words of caller?
 - Male or Female?
 - Accent?
 - Familiar voice?
 - Background noises?
 - Did the caller seem to be familiar with the building or location?
3. Notify the senior employee on site who will determine if the premises will be evacuated. If they are to be, assemble at the muster point unless otherwise instructed.
4. CALL 911 and follow their instructions.
5. Do not allow anyone other than authorized personnel to enter the site. Everyone that has been escorted from the site should remain at a designated location for possible questioning.
6. If the senior employee determines that the media may show up on site, they are to contact the company spokesperson immediately.

Natural Disasters

Every year, natural disasters such as tornadoes, hurricanes, floods and earthquakes strike, causing unimaginable suffering and loss. Unlike other types of crises, natural disasters are not preventable. There are, however, ways to plan for and mitigate the effects of natural disasters that will protect against serious injury or loss of life and property.

For more information on preparedness and prevention, refer to “Extreme Weather Best Practice” (Chapter 3 of Safety Manual).

As a minimum, to be prepared to deal with the after effects of a natural disaster, all employees are to know:

- The company communication guidelines
- The crisis management plan
- The emergency warning system for their particular site/ facility (air horn, etc)
- Where the muster point and all exits are located

After the Disaster

If serious injuries are sustained or a fatality occurs, media are involved, or external agencies need to be contacted follow the guidelines within this Plan for reporting and notification, starting with the “First Hour Checklist”.