

Section 1

Company Health and Safety Policy

Policy Statement

The management of Rite-Way Traffic Control is committed to providing a safe, healthy, drug free work environment on every work site. We are dedicated to identifying, correcting and preventing health, safety and environmental hazards that could adversely affect our employees, customers or the general public. Management is committed to ensuring that all applicable regulatory health, safety and environmental protection requirements are complied with and that adequate resources are provided to ensure the health and safety of our employees as well as the preservation of the environment to this end. It is our policy to provide a healthy and safe work environment for employees at every level through awareness and prevention of occupational injuries and illness.

The objective of our company Health and Safety Program is to reduce work-related accidents (thereby injuries) and illness and to promote health and safety in every task undertaken by employees on behalf of the company.

To this end our Health and Safety Program will include:

1. Implementation of a program for conducting routine health and safety inspections to identify and eliminate unsafe working conditions or practices and control health hazards.
2. A comprehensive health and safety training program for all new and existing personnel.
3. Provisions for the use of personal protective equipment by all employees.
4. Provisions for mechanical and physical safe guards to the maximum extent possible.
5. Company-wide health and safety policies requiring every employee of the company to comply with these policies as a condition of employment.
6. Provisions for a thorough and prompt investigation of every accident to determine its cause; correct the problem and reduce the likelihood of it reoccurring.

Policy Commitment

Copies of this policy will be posted, distributed and explained to all workers. Compliance with this policy will be reviewed regularly at all employee levels.

Violations will be recorded. Repeated disregard or willful violations of this policy by any subcontractor or employee at any level may be considered cause for discipline in accordance with the Workers Compensation Act and existing laws.

_____ Owner

_____ Date

Management Commitment

The management of Rite-Way Traffic is committed to the company's safety policy, and to provide direction and motivation by:

- Appointing Safety Coordinator(s) and/or Safety Committee Co-chairpersons once the company reaches 20 employees.
- Establishing company safety goals and objectives.
- Developing and implementing this written Health and Safety program.
- Ensuring total commitment to the Health and Safety program.
- Facilitating employees' safety training.
- Establishing responsibilities for management and employees to follow.
- Ensuring that management and employees are held accountable for performance of their safety responsibilities.
- Establishing and enforcing disciplinary procedures for employees.
- Reviewing the Health and Safety program **annually** and revising or updating as needed.

Labour & Management Accountability

All employees, both labour and management, need to understand their responsibilities under WCA rules and be held accountable for complying with the rules as well as the company's related policies.

Health and Safety Program

Purpose

The purpose of the Health and Safety Program is to establish a proactive approach to the elimination of workplace hazards through the policies and procedures contained in this manual, worker participation and training, and through the promotion of constant vigilance by all employees.

Responsibility

It shall be the responsibility of management to implement and monitor this program.

Procedure

The Health and Safety Program shall be based on the following:

- A. Employee training** is the most important and most fundamental requirement of this program. As related to the tasks involved and potential for exposure, employees shall be trained in accordance with the Rite-Way Traffic's training curriculum. The training may be conducted by competent personnel or others. Employees shall not be assigned job responsibilities until the training associated with job hazards has been completed, and documentation shall be maintained verifying employee participation and comprehension. Frequency of training shall be in accordance with OHS requirements.
- B. Hazard Identification and Control: *Management*** shall be responsible for the administration of training in this program. The execution of the program which includes identification, analysis, and control of the below elements is to be done prior to commencement of work at all job sites by the Traffic Control Person(s).

1. Physical hazards are those that can be attributed to the workplace itself and include the worksite or building, machinery, materials, processes, electrical hazards, housekeeping, noise, heat, etc. Safety inspections shall be conducted by the Traffic Control Person on site. Any hazards discovered shall be corrected or the set-up shall be implemented to eliminate the hazard. In the event the hazard cannot be avoided or controlled, the TCP (Traffic Control Person) on site must contact a supervisor prior to discuss an alternative solution.
2. Work practices are those tasks, movements, and operations required to accomplish a job. Each segment of the operation may offer real or potential hazards and as such should be scrutinized by personnel trained in hazard recognition. Areas to be addressed include but are not limited to:
 - a. The Lane Closure Truck
 - b. The set-up of equipment and how they are moved and handled
 - c. Pedestrians, workers, vehicle traffic and bicycle traffic.
 - d. Process produced hazards (dust, vapours, light, heat, etc.)
 - e. Personal protective equipment
 - f. Worker ergonomics
 - g. Manipulated vehicle traffic and their speeds.
 - h. Maintaining an escape route.
 - i. Employee training and experience findings generated by hazard assessments shall be reviewed by management and methods shall be developed to minimize or eliminate the hazard.
3. Regardless of the severity, all job-related accidents, injuries, and all occupational illnesses shall be reported and investigated. It shall be the responsibility of management to provide the resources necessary to satisfy this requirement. All supervisors and foremen shall receive training in accordance with this procedure and in accordance with Accident, Injury and Illness Reporting and Record Keeping, and any procedures subsequent to that policy. All accident, injury, and illness reports and all investigations of those incidents shall be reviewed, and prevention measures outlined, by management to the respective area where the incident occurred.
- C. Hazard notification will include all employee communication of real and potential workplace hazards. Specifically, training shall be administered to all employees in accordance with procedures. Additionally, chemical-specific training shall be administered whenever a task requires an employee to come into direct contact with a hazardous chemical or has the potential to be exposed to a hazardous chemical. Hazard notification shall also include all training sessions, notifications, employee suggestions, safety meetings, tailgate meetings, etc., where real or potential workplace hazards are discussed. It shall be the responsibility of the **lead TCP** to ensure that hazard assessments are conducted and that the results of those assessment and subsequent corrective actions are communicated to all affected employees.
- D. It shall be the responsibility of **management** to ensure that all records required by this procedure are developed and maintained for a period of not less than 7 years. These records include but are not limited to:
 1. Hazard Assessments
 2. Safety Inspections
 3. Training Documentation (curriculum, materials, tests, rosters, etc.)
 4. Safety meeting records (roster of attendees, subjects discussed, etc.)
 5. Accident/Illness reports and investigations.

Responsibilities

Company Owner

- Prepare and review at least annually a written company H&S policy.
- Assign and review the development of a program to implement the H&S policy.
- Provide the necessary resources to implement, support, and enforce the company H&S policy and program in accordance with the Workers Compensation Act and the regulations made under the Act.
- Meet all legal requirements for investigating and reporting critical injuries, accidents, incidents, occurrences, and other events.
- Conduct an annual H&S review with project manager and superintendent.
- Create a joint health and safety committee (JHSC) and represent management on the committee once the staff members reach at a minimum of 20 employees.

Employees

Employees must recognize their role in safety. That role should involve a responsible attitude for personal safety and the welfare of coworkers, contractors and the general public. It is critical to the success of our health and safety program that employees have as their goal the concept that injuries can be prevented.

Employees should:

- Work in accordance with the company H&S policy and program, the project H&S program, the Workers Compensation Act, and the regulations made under the Act.
- Report hazards or unsafe conditions to their supervisor immediately.
- Report all accidents, injuries, and near misses to their supervisor.
- Follow emergency response plans when necessary.
- Inspect personal protective equipment (PPE) as required.

Accident/Incident Investigation

- Accidents/incidents will be investigated by trained individuals.
- The primary focus shall be to understand why the accident or incident occurred, and what actions can be taken to preclude recurrence.
- The focus will be on solutions and never on blame.
- Investigations will be documented, and adequately identify the causes of the accident or near-miss occurrence.

Young and New Worker Orientation and Training

Young and New Workers will be provided with:

- The name and contact information for the young or new worker's supervisor
- The employer's and young or new worker's rights and responsibilities under the Workers Compensation Act and OHS Regulation including the reporting of unsafe conditions and the right to refuse to perform unsafe work
- Workplace health and safety rules
- Hazards to which the young or new worker may be exposed, including risks from robbery, assault or confrontation
- Rules for working alone or in isolation
- Information on violence in the workplace
- Personal protective equipment required by the employer, training, proper use and maintenance.
- The location of first aid facilities and means of summoning first aid and reporting illnesses and injuries
- Training in Emergency Procedures

- Instruction and demonstration of the young or new worker's work task or work process
- The employer's health and safety program, if required
- WHMIS information requirements as applicable to the young or new worker's workplace
- Contact information for the joint health and safety committee or the worker health and safety representative, as applicable to the workplace.

Additional Orientation and Training

Young or New workers will receive additional orientation and training if:

- A workplace observation reveals that the young or new worker is not able to perform work tasks or work processes safely, or
- It is requested by the young or new worker

Section 2

Hazard Assessment, Recognition and Control

Rite-Way Traffic is committed to providing a safe and hazard free workplace. It our policy to use the “recognize, assess and control” method for dealing with hazards.

Definitions

Hazard: is any practice, behaviour, condition, or combination that can cause injury or illness in people or damage to property.

Hazard Recognition: means noting a “suspected” hazard, because of its potential to harm or damage, or having it brought to your attention. The alert may come as a personal opinion or concern.

Hazard Identification: is a skill used by a trained individual who has the knowledge to make this determination.

Hazard Assessment: means evaluating the degree of risk and exposure to the suspected or identified hazard.

Health hazards include:

- chemical agents (solids, liquids or gases)
- physical agents (forms of energy or force such as sound, heat or electricity)
- biological agents (microorganisms from plant, animal or human tissue)
- ergonomic hazards (consequence of poor equipment, workstation design or work activity design).

Safety hazards

These have the potential to cause traumatic injury or death. They include:

- machinery and equipment related hazards
- energy hazards (falls, struck by incidents, kinetic, released energy)
- confined space hazards and
- material handling hazards

Inspections of the job-site and or facility shall be performed prior to the commencement of work. During the course of inspection if a hazard is identified it is immediately corrected. If the hazard is not immediately correctable, all appropriate personnel shall be notified and the hazard shall be clearly identified by signs, barricades, or other warnings.

Assessments shall include if necessary:

- A detailed inspections of the road, sidewalk and traffic flow
- Physical observation of work practices
- A pre-work discussion with all workers of the work to be done

Self-Inspection for OHS/WCA Compliance

The scope of self-inspections should include the following:

- Housekeeping – maintaining equipment on site, watching for dust or other substances that may obstruct vehicle traffic from reading the advances warning signs, maintaining the work zone at all times.
- Personnel — experience training, including hazard identification training; methods of checking lane closure trucks before use; type of clothing; personal protective equipment; work practices; and methods of cleaning, or adjusting equipment.
- Chemicals —transportation, spills, disposals, amounts used, labelling, toxicity or other harmful effects, warning signs, training, protective clothing and equipment, and hazard communication requirements.
- Personal Protective Equipment — type, size, maintenance, repair, storage, assignment of responsibility, purchasing methods, standards observed, training in care and use, rules of use, and method of assignment.
- Transportation — motor vehicle safety, seat belts, vehicle maintenance, and safe driver programs.
- Review — evacuation routes, equipment, and personal protective equipment.

Section 3 First Aid

Rite-Way Traffic is committed to the Health and Safety of our employees and ensures that first aid boxes are stocked and available to all employees.

Procedures In Case Of Injury

Management’s Responsibilities:

First Aid Only:

- Ensure first aid will be administered immediately by a certified person.
- The first aid treatment will be recorded on the Injury Treatment Record.
- Medical Attention Required.
- Provide treatment memorandum and transportation to medical attention.
- Submit Employer’s Report of Accident to the Board within **three** days (with a copy to the union office, where applicable).

Modified Work:

Often an injured worker will be capable of performing duties that will not aggravate the injury. Wherever possible, Rite-Way Traffic will seek to provide immediate, suitable modified work in order to avoid a possible loss in wages for injured employees.

Lost Time From Work Required:

- Pay wages for the day of injury.
- Monitor the employee's recovery.

Employee's Responsibilities:

- Obtain first aid promptly.
- Report injury **immediately** to your supervisor.
- Ensure you are accompanied to a hospital or medical clinic.
- Obtain a Treatment Memorandum form from the supervisor when medical attention is required. Ensure this form is completed by the first doctor to treat you and return it to your supervisor without delay.

First Aid Attendant Responsibilities:

The first aid attendant has general control and supervision of the first aid kit, and where one is required, the first aid room. They are to be available at all times during their shift to treat an injured or ill person without any undue delay. (i.e. available to leave at a moment's notice). The first aid attendant must keep their first aid certificate at the worksite and have it available on request of a government occupational health and safety officer.

First Aid

Should an accident occur, it is essential that first aid be administered immediately, followed by proper medical treatment if necessary.

Basic First Aid

- A first aid kit with required contents will be available at each workplace/worksite.
- Each first aid kit will contain an Injury Treatment Record. Any use of the first aid kit will be recorded, including details of the injury, the injured person's name, the date and time of first aid treatment, the nature of the treatment and the name of the person rendering treatment.
- This record is required legally and compliance will be strictly enforced.

Note:

See Schedule 3-A - Minimum Levels of First Aid in the Occupational Health and Safety Regulations (OHSR) for more information.

Emergency Procedures

1. **Take Command** - Assign the following duties to specific personnel:
2. **Provide Protection** - Protect the accident scene from continuing or further hazards-for instance, traffic, operating machinery, fore or love wires.
3. **Give First Aid** - Give first aid to the injured as soon as possible.
4. **Call an Ambulance** - Call an ambulance and any other emergency services required. In some locales dialing 911 puts you in touch with all emergency services.
5. **Guide the Ambulance** - Meet and direct the ambulance to the accident scene.
6. **Get the Name of the Hospital** - For follow-up, find out where the injured person is being taken.
7. **Advise Management** - Inform senior management. They can then contact relatives, notify authorities and start procedures for reporting and investigating the accident.
8. **Isolate the Accident Scene** - Barricade, rope off or post a guard at the scene to make sure that nothing is moved or changed until authorities have completed their investigation.

Section 4

Accident & Incident Investigation

Purpose

It is the goal of Rite-Way Traffic to provide an accident-free workplace for all employees. It is our belief that all accidents are preventable. Though great time and effort is spent identifying hazards and reducing the possibility of an accident happening, there is still the possibility that an accident may occur. Whenever there is an accident, it is our obligation to investigate that accident and to install measures to prevent a reoccurrence. This procedure establishes methods to be used in the investigation, reporting and record keeping of accidents to include fatalities, first aid cases, vehicle accidents, property damage, spills, fires, and significant near misses.

Responsibility

It shall be the responsibility of management to ensure this procedure is implemented and revised as necessary to ensure effectiveness in the determination of the root cause of accidents. Rite-Way Traffic shall provide the necessary tools and training for supervisors, and foremen to allow the successful implementation of this procedure. The principal responsibility for conducting accident investigation has been assigned to **Management**. An investigation shall be conducted into the events and circumstances leading up to and surrounding each and every accident, incident, exposure, and near miss accident that occurs in the workplace.

Procedure

The Goal of the Investigation

1. Survey the accident scene. Make a list of people who were present at the time of the accident. Make drawings of the layout of the area; take measurements and photographs of the scene.
2. Interview the worker who was injured and anyone else who has information relevant to the investigation. Verify your understanding and recording of the accident with the person who is being interviewed. Each witness should sign and date their statement after having reviewed it.
3. Examine the site of the accident in detail. If there was a death or critical injury, you must ensure that the scene is not disturbed before OHS and/or police investigators have done their jobs. Look for equipment damage. Take note of environmental details: noise level, visibility, temperature and exposure to hazardous materials.
4. Organize the facts and have the information analysed. Ask the questions who, what, when, where, why and how to see if any information is missing.
5. Prepare the report. Ensure to include sufficient detail so that the events leading up to the accident are understood. The report should identify all the causes of the accident including underlying causes.
6. Take corrective action; notify workers about actions taken and recommendations made to management.
7. Follow up. Monitor actions taken on recommendations for preventing recurrences. Be persistent to ensure that they are implemented. Keep records of the date of implementation of the recommendations.

Typical contributing factors can be, but are not limited to, the following:

1. Communication Problems: procedures, policy, training, work practices, maintenance, proper equipment operation, scheduling, etc.
2. Preparation Problems: inadequate employee training, non-routine tasks, lack of or improper tools and equipment, lack of hazard identification and assessment, etc.
3. Environmental Problems: weather conditions, slippery work surfaces and other slip, trip, and fall hazards, elevated work surfaces, personal protective equipment, etc.

4. Improper Work Practices: body positioning, improper or misuse of personal protective equipment, work load, using shortcuts, improper use of tools or equipment, tool condition, etc.

Investigation Method

- A. Before the Accident In order to minimize the effects of any accident and to preserve crucial evidence, it is necessary that all employees are aware of the following:
 - How accidents are reported and by whom.
 - To who are accidents reported.
 - Methods used to alert other employees that an accident has occurred and areas to be avoided.
 - Who contacts emergency personnel.
 - Emergency methods to shut down the operation.
 - The capability of emergency services and how to contact them.

B. When an Accident Occurs

1. Take Charge of the Situation

- a. Assess the situation
- b. Provide direction
- c. Preserve evidence

2. Take Care of the Injured

- a. Notify emergency services as required
- b. Assist the injured
- c. Provide first aid when necessary
- d. Reduce or eliminate the possibility of further injury

3. Neutralize the Area

- a. Clear non-essential personnel
- b. Prevent related accidents
- c. Turn off or neutralize power equipment
- d. In case of chemical spills, evacuate as necessary
- e. Preserve evidence
- f. Ensure nobody alters the scene
- g. If possible, record names of witnesses and any remarkable information
- h. Look for obvious clues
- i. Write it down, do not depend on your memory

C. Collect Evidence

1. People Evidence: Interview witnesses (Remember, the victim is a witness) and determine:

- a. What they knew concerning the situation leading up to the accident.
- b. What they saw when the accident occurred.
- c. What they saw and what they did after the accident.

2. Position Evidence: Determine the locations of:

- a. The victim and other personnel,
- b. Structures, equipment and tools.

3. Parts Evidence: Determine any contributing factors:

- a. Condition of equipment (i.e. failed parts)
- b. Parts of product or structure involved.

4. Paper Evidence: Collect data pertaining to:

- a. Employee training (both safety and operational).
- b. Equipment maintenance and inspection records.

- c. Work instructions and procedures.
- d. Hazard assessments.
- e. Disciplinary actions for earlier unsafe acts.

D. Root Cause Determination

1. The immediate cause (not necessarily the root cause) of the accident
2. Elements contributing to the accident.
3. Root cause of the accident. Remember, if the root cause had been properly addressed before the accident, the accident would not have occurred.

Accident Investigation and Reporting Guidelines and Procedures

Purpose

The investigation and reporting of accidents involving personal injury to an employee and/or vehicle or property damages are necessary elements of an effective Health and Safety Program. The investigative reports required by this section provide a mechanism for gathering information and data relative to the accidents and are invaluable in preventing reoccurrences of similar accidents. The investigation reports shall also be used for the preparation of claim reports as required, notification of regulatory authorities, and to ensure that injured employees receive timely and appropriate medical care and benefits to which they are entitled.

Responsibilities

Supervisors shall ensure that necessary emergency care of injured personnel shall be of the highest priority and any procedures contained herein shall be secondary to ensuring that injured personnel receive adequate medical attention.

Employees involved in, or a party to, an accident involving personal injury and/or illness, vehicle or property damage are responsible for reporting the occurrence to their immediate supervisor as soon as possible. They shall assist the supervisor in completing the required investigative reports. The appropriate supervisor is responsible for conducting the initial investigation of all accidents when an employee has sustained and injury on the job to include non-lost time or medical only type injuries or when property or equipment has been damaged as a result of an accident. The appropriate supervisor will also investigate all near miss occurrences that could have resulted in personal injury and/or property damage. The joint health and safety committee or health and safety representative shall review all initial investigation reports and assist in completing the investigations as required. The completed investigation report shall be submitted to management for review and to implement the necessary corrective actions to prevent reoccurrence. Where accidents involve loss of life or serious injuries to any person, catastrophic occurrences (involving three or more victims), and major property and/or equipment losses, legal counsel shall be notified as soon as possible and shall direct all such investigations.

Investigation Process

The supervisor's investigation shall be initiated as soon as possible after the occurrence of an accident. The names of all witnesses and their pertinent statements should be obtained and any failed parts or other evidence should be noted, identified, and taken into custody where feasible. Reporting forms are provided and all pertinent information specified on the form should be obtained. Only factual information shall be included in the investigation report. Photos may be taken as appropriate and when taken shall be specifically identified as to the scene depicted. Additional documentation, such as personnel records, maintenance records, etc., may be necessary in order to complete the investigation report. However, the safety committee/health and safety representative and/or legal counsel should be consulted as this becomes necessary. The Supervisor's Accident Report and Accident report forms shall be completed as appropriate and forwarded to management as soon as possible.

Serious Accident Notification and Procedures

In the event of an employment-related accident that involves loss of life, serious injury to any person (hospitalization), catastrophic occurrences, or major property and/or equipment loss, the following procedures shall be implemented:

1. Equipment, material, or product related to injury or fatality will not be moved or altered until clearance is given by management.
2. In situations where compliance with the above would interfere for an unreasonable length of time or create additional hazards to persons, the onsite supervisor is authorized to alter the position of equipment, materials, or products before clearance is obtained from management. Documentation shall be made of any alterations or changes made to the accident scene.
3. Reports to regulatory authorities shall be made by the appropriate division or company management personnel in accordance with the regulations of the jurisdiction in which the accident occurred.

Claims Reporting Procedures

Worker's Compensation Claims reports shall be filed in accordance with the claim reporting procedure

Section 5 Driver Safety Policy

Policy

The success and the safety of Company employees depends on the mutual cooperation of each employee who has been entrusted with the responsibility of driving a company vehicle, or their own vehicle, while conducting company business. In order to reduce vehicle accidents and limit liability because of driver negligence, our Company has adopted a Driver Safety Program.

Procedure

The procedures set forth in the Driver Safety Program will be the guidelines for management adherence to this policy.

Responsibility

The supervisors at Rite-Way Traffic have the primary responsibility for management of the Driver Safety Program. **Management** will appoint a responsible representative to report all driver information requested by our insurance broker. **Management** is responsible for the records of the Driver Safety Program. Duties will include, but are not limited to:

- Be responsible for monitoring the driving record of those persons who operate the company vehicles or their own "personal" vehicle while on company business.
- Monitor the Driver's Safety Program and report to management any suggestions for improvement or needed changes.
- Monitor the maintenance policy of fleet vehicles so that they are kept in safe condition
- Review each vehicle accident report or infraction with management.
- Monitor renewals of insurance records.

Motor Vehicle Safety

The safety of employees at Rite-Way Traffic is of utmost importance. The selection of employees who will be required to drive full or part-time will be done with care. Drivers of company vehicles can be considered qualified when they meet the following criteria:

- Possess a valid driver's licence of the proper class.
- A review of driving record shows that they do not pose an unreasonable risk.

Driver Training

All employees driving company owned vehicles for Rite-Way Traffic will be trained in safe operation of assigned vehicle.

- Defensive driving
- Split-second decision making
- Backing-up rules
- Safe distances
- Intersection driving
- Poor condition driving in dust storms, rain, etc.

Preventive Maintenance

Establishment of a preventive maintenance program for all COMPANY vehicles is essential. Record jackets will be maintained on all vehicles so that a log can be maintained on all planned maintenance, as well as repairs made from noted defects.

Vehicle Inspection

Each vehicle or piece of equipment shall be inspected on a daily basis by the operator before and after operation. Each operator is responsible for the safe condition of the equipment. Any vehicle having steering, brake, or other safety problems is not to be operated until repairs have been made by a mechanic. Any other unsafe conditions are to be reported to the operator's supervisor as soon as possible.

Vehicle Operation

All COMPANY vehicles and equipment are to be operated in a safe manner and operators will adhere to all applicable laws. The operator is fully and totally responsible for the safe operation of the equipment. The operator shall report any accidents, or damage, to the Vehicle Operations Supervisor.

Drivers

Drivers of vehicles that are owned, rented or leased by The Company will be required to follow defensive driving techniques and practices. The basic defensive driving practice is to plan ahead and do everything that one can reasonably do to prevent an accident. This is to include the use of seat belts.

The following guidelines will be followed: Drivers for our Company must possess a valid driver's licence in order to operate any company vehicle or their own personal vehicle on company business. The duties of drivers will be reviewed. The requirement will be noted by the employee's supervisor or personnel staff at the time of hire. The driver should be physically and mentally capable of driving the vehicle he/she is assigned to drive, whether the vehicle is a car, van, or truck.

Pre-operation of Vehicles

Prior to the assignment of any vehicle to any employee or prior to allowing an employee to drive "Their Own Personal Vehicle" on company business, the following minimum standards will be implemented and

records maintained to ensure that the driver is qualified to drive the vehicle and minimize the risk of liability to our Company.

Initial Assignment

Verification and recording of date any type of driver's licence held and renewal date noted. A review of the driver's province Motor Vehicle Record for the most recent three-year period to include the following:

- Review of the accident report history showing the dates and types of accident regardless who was at fault.
- Review of the traffic violations for the last three years, with evaluation of acceptable driving records according to Company guidelines.
- Confirmation of personal insurance for those driving their personal vehicle while on company business.
- Physical examinations when required by the province for the driving of specified vehicles or by funding and licensing contract.
- The driver with a major conviction shall be immediately suspended from driving any company vehicle or their personal vehicle on company business.
- Driving a company vehicle while under the influence of drugs or alcohol will subject the employee to disciplinary action up to and including dismissal.

Annual Review

Once each year, a request for current licence information will be sent to each Company employee. Employees who drive a company vehicle, or if they request mileage reimbursement for driving their personal vehicle on company business, will have their personal driving record reviewed. It will be the responsibility of the employee to respond in a timely manner. Failure to respond to the request for information by personal vehicle drivers may result in the delay of mileage reimbursements. A review of each driver's file and record will be made annually and will include all of the criteria above as appropriate for each employee. This will not preclude request of driver's records for review by Janelle Jack as deemed necessary.

Note: Police shall be called to investigate all vehicle accidents for Weslan Cable Ltd. It is vehicle operator's immediate supervisor's responsibility ensure that all facts are obtained with respect to the driver. Under no circumstances should any employee make any statement relative to liability or draw any conclusions as to the facts asserted at the scene. The occurrence of a vehicle accident may or may not be the fault of the employee. It is important to investigate and determine the cause of the accident and any necessary corrective action that may taken by the employee's immediate supervisor.

Questions to Help Determine if a Vehicle Accident was Preventable

One basic question in determining preventability is: "Did our employee take every reasonable precaution to avoid the auto accident?" If "No," our driver was not driving defensively therefore, the accident should be judged "preventable." Please note that legal liability or any citations should never influence the decision of determining preventability of an accident. See following page.

Safe Operating Guide for Company Vehicles

Preventing Collision with a Vehicle Ahead

An extremely frequent and costly accident is the collision with the vehicle ahead. There are five steps that can be taken that will help you avoid being involved in a collision with the vehicle ahead:

Be Alert — Watch for signs from the driver or drivers ahead as to what they intend to do. Are their turn signals on? Are their brake lights lit?

Drive Ahead of the Situation — Look beyond the vehicle ahead to see situations that may force him to act quickly and thereby become a threat to you.

Stay Back — Allow plenty of following distance. Allow one car length (using your own vehicle as a measure) for every 15-16 km (10 miles) of speed and allow even more distance in adverse weather or road conditions.

Stopping Ability — This is the distance necessary to bring your vehicle to a stop that depends on a number of factors. The first is "driver reaction time". This is the time it takes for the driver to see the need to stop, take his foot from the accelerator to the brake pedal and begin to apply the brake. "Driver reaction distance" is based on an average driver reaction time of $\frac{3}{4}$ of a second for a typical driver under normal driving conditions. The distance travelled during the reaction time of $\frac{3}{4}$ of a second will depend upon the speed of the vehicle. The second ingredient involves "braking distance". This is the distance travelled from the time the brake is applied until the vehicle is brought to a stop. This distance will also vary based on the speed of the vehicle. The type and condition of the pavement surface will also affect the braking distance, the type and condition of tires, and the condition of the brakes.

Begin to Stop Sooner — Slow down and touch your brakes the instant you see a hazard developing. The situation may require you to stop. Failure to do this is known as "delayed braking" — a serious flaw in good defensive driving techniques. A defensive driver should not have to make a true "panic" stop more than once a year. Stopping ability can be expressed as a formula: REACTION DISTANCE + BRAKING DISTANCE = TOTAL STOPPING DISTANCE Remember, moving at 88.5 kilometres (55 mph) produces a travel distance of 24.3 metres (81 feet) for each second of delay.

How to Avoid Backing Accidents

Backing can be a "dangerous manoeuvre". Because of the hazards of backing, the defensive driver avoids backing whenever possible by planning an alternative manoeuvre or choosing another route. The defensive driver does not back out of parking lots, driveways, or alleys when he can avoid it. Instead, he drives in and turns around so he comes out front first. When this is not possible, he backs in so that he can drive forwards to come out. He knows it is safer to back out of traffic into a quiet area than to back into a heavy traffic stream. When backing is unavoidable, follow these rules:

- "Size up the situation" thoroughly and completely, even if you have to get out of your vehicle to do so. Then start backing promptly before the backing situation changes.
- Back slowly.
- Check both sides as you back. Check your mirrors often during the backing movement.
- Do not depend entirely on your mirrors to judge distance to the rear. Mirrors help you to spot pedestrians who may unexpectedly move into the path of your backing vehicle, but mirrors can be deceiving in estimating or measuring distances and clearances.
-

Avoid a Collision with a Following Vehicle

There are measures you can take to avoid being hit from behind:

- Signal Your Intentions — Use your directional signals and your brake lights.
- Stop smoothly — if you follow the rule for avoiding a collision with a vehicle ahead, you will also reduce the chances for a collision of the vehicle following.
- Keep Clear of Tailgaters — Do not let a tailgater rile you. Just slow down. Increase the following distance between your vehicle and the vehicle ahead, so you do not have to brake suddenly if a tailgater hits you.

Avoid a Rear-End Collision When Stopped

- Keep a foot on the brake pedal to activate lights.

- Stay at least 1.8 metres (6 feet) away from any stopped car ahead to avoid the "domino", multi-collision chain reaction effect.
- Keep your lights on at dusk or in the rain or other poor visibility conditions.

The Technique of Passing

Any passing manoeuvre often entails risk. The following twelve points will help to reduce that risk:

1. Decide if the Pass manoeuvre is necessary.
2. Make certain there is a safe following distance between you and the vehicle ahead.
3. Check the traffic ahead if you are moving in the oncoming traffic lane. If your vehicle and the oncoming vehicle are both travelling at 88 km (55 miles) per hour, you are closing the gap between you at the rate of 48.3 metres (161 feet) per second. Since it takes 10 seconds to complete the task, the oncoming car should be at least ½ kilometre (1/3 mile) away.
4. Check the traffic behind you before changing lanes. First check your mirrors and then your blind spot.
5. Signal with your left turn signal before you change lanes.
6. Move into the left lane.
7. Accelerate as you move alongside the vehicle you are passing.
8. Signal the vehicle you are passing by tapping your horn or flashing your lights if you deem this necessary – especially at night.
9. Signal your intention to return to the right lane by the use of directional signal.
10. Return to the right lane when you can see all of the passed vehicle(s) in the right rear- view mirror.
11. Do not forget to cancel your directional signal.
12. Resume your proper cruising speed as soon as you have completed your passing manoeuvre.

Driving Emergencies

Brakes Fail — If there is any resistance, pump the pedal. You may be able to work up enough pressure to help somewhat. Most vehicles are equipped with a dual brake system. If one system fails, the back-up system should work. If pumping the brake pedal does not help, coast in "drive" gear and use the parking or hand brake. If you want to slow faster, shift to lower gears which will permit engine compression to help you slow your vehicle. Use your horn or lights to warn other drivers and pedestrians that you are in trouble and out of control.

Skid — If the rear of the vehicle starts to slide, take your foot off the gas at once. Your first instinct may be to turn hard away from the direction of skid. Do not! That will really spin you. Turn your wheels in the same direction of the skid – but be careful, do not over-steer. You will be able to feel when the vehicle regains rolling action, and then straighten the wheel. "Never hit the brakes as a side skid correction". For fast stopping with the least chance of causing a side skid, pump your brakes hard with a rapid jabbing and releasing pressure on the brake pedal. Disc brakes require slower pumping.

Blow-Out — Keep a firm and steady grip on the steering wheel and do not over-steer to correct swerve or pull. If a front tire fails, there will be a strong pull to the side of the blow-out. A rear blow-out tends to cause weaving of the rear end. Do not slam on the brakes. Brake smoothly - but easily. Day or night, set out flares or other warning devices such as reflectors and turn on your light flashers.

Stopping on the Freeway — On a freeway with paved shoulders, signal and pull off the road at near traffic speed, then slow down. Do not obscure your taillights by standing or working behind your vehicle. Day or night, place a flare or reflector warning device about 4.5 metres (15 feet) behind the vehicle and another at about 90 metres (300 feet) further back.

Seat Belts

Seat belts have been provided for your safety. They should be worn and properly adjusted at all times when your vehicle is in motion.

Accident Reporting

When reporting a vehicle accident involving other vehicles and persons, be certain that you have all pertinent information regarding other vehicles or equipment, any persons involved, and specific circumstances of the mishap. Become familiar with the COMPANY reporting form and procedures. Know where to obtain copies of the form and keep them in your assigned vehicle at all times.

Accident Scene:

- Secure the scene to prevent other accidents from occurring.
- Place warning cones, flashers, reflectors or flares to protect the scene.
- Report injuries to emergency response services.

Accident Data:

- Date, time and location of the accident – list streets and known landmarks.
- Describe in detail what & how it happened - use a diagram to illustrate the scene.
- Road surface, weather and light conditions.
- Names, addresses and telephone numbers of parties involved.
- Determine who was injured, extent of injury and report their role in the accident.
- If injured persons on scene, where were they taken and by what means of transportation (drove self, by friend, by ambulance).
- Names, addresses and telephone numbers of witnesses and their statements.
- Licence numbers of vehicles and description of the damage.
- Name and badge number of responding police officer, if available.
- Take pictures of the accident scene, paying attention to injured persons and property damage. Take picture close up as well as far away that indicate cross streets, background landmarks that can document the accident location.
- In accidents not involving other vehicles or people, record the information outlined in your accident report kit and submit it to your fleet supervisor.

Accident Review

Determining Preventability

When a driver reports an accident, a COMPANY accident review committee must determine whether the accident was preventable by the driver involved. The board should consist of the vice president of operations, the fleet supervisor, the company safety director and any other person deemed necessary. Once preventability is determined, the committee should decide the disciplinary actions to be assigned to the driver involved.

Preventable Accidents

A preventable accident is any occurrence involving an owned or operated vehicle that results in property damage and/or personal injury. This applies regardless of who was injured, what property was damaged, to what extent or where it occurred, and whether or not the driver in question failed to do everything possible to prevent it. The following paragraphs are offered as a guide in determining the preventability of these accidents.

Guidelines to Determining the Preventability of Accidents

Accidents involve so many different factors that it is impossible to set hard and fast rules to classify them as preventable or non-preventable. The accident review board will make this determination. In making these decisions, the board will answer the question "What standard of safe driving performance do we

expect from our drivers in this company?" Drivers respect a strict interpretation of the rules so long as the company takes the time and effort to ensure that these interpretations are made consistently and fairly.

Intersections

It is the responsibility of all drivers to approach, enter, and cross intersections prepared to avoid accidents that might occur through the action of other drivers. Complex traffic movement, blind intersections, or failure of the other driver to conform to law or traffic control devices will not automatically discharge an accident as "non-preventable". Intersection accidents are preventable even though the driver has not violated traffic regulations. The vehicle operator's failure to take precautionary measures prior to entering intersections is a factor to be studied in making a decision.

When a driver crosses an intersection and the obvious actions of the other driver indicate possible involvement, either by reason of excess speed, crossing a lane in turning, or coming from behind a blind spot, the decision should still be a preventable accident.

Practically any backing accident is preventable. A driver is not relieved of the responsibility to back safely, even when a spotter is involved in the manoeuvre. The spotter cannot control the movement of the vehicle; therefore, a driver must make sure all backing zones are clear.

Front-End Collisions

Regardless of the abrupt or unexpected stop of the vehicle ahead, your driver can prevent accidents of this nature by maintaining a safe following distance, knowing the conditions of the road and the load. This includes being prepared for possible obstructions on the roadway, either in plain or hidden view. Overdriving headlights at night is a common cause of front-end collisions. Night speed should not be greater than that which will permit the vehicle to come to a stop within the distance illuminated by the vehicle's headlights.

Rear-End Collisions

Investigation will often disclose that a driver risked being struck from behind by failing to maintain a margin of safety in his/her own following distances or making abrupt lane changes. Rear-end collisions preceded by a rollback, an abrupt stop at an intersection, when a traffic signal changes, or when your driver fails to signal a turn or slow down gradually should be charged as preventable.

Passing

Failure to pass another vehicle safely indicates faulty judgment and possibly failure to follow the important factors a driver must implement before attempting to pass. Unusual actions of the driver being passed or of oncoming traffic might appear to exonerate a driver involved in a passing accident; however, the entire passing manoeuvre is voluntary and your driver is responsible for a safe pass.

Being Passed

Sideswipes and cut-offs involving a driver while being passed are preventable when the driver fails to yield to the passing vehicle by slowing down or moving to the right where possible.

Lane Encroachment

A safe driver is rarely a victim of entrapment by another driver when changing lanes. Similarly, entrapment in merging traffic is an indication of unwillingness to yield to other vehicles or to wait for a break in traffic. Blind spots are not valid excuses for lane encroachment accidents. Drivers must make extra allowances to protect themselves in areas of limited sight distances. Squeeze plays causing involvement with parked cars, pillars, and other road structures can be prevented by dropping back when it is apparent that the other driver is forcing the issue or contesting space on the road.

Grade Crossings

Preventing collisions with rail track vehicles, such as trains, occurring at grade crossings, in traffic, or on private property is the responsibility of the driver. When a vehicle is parked across a rail siding, the driver must first determine if it is safe and permissible. He/she must stand by in case conditions change by the movement of railcars. Common grade crossing accidents occur on county/country roads that lack crossing indicators, barriers and flashing lights. At these crossings, it is important for the driver to have clear sight, up and down the tracks in both directions, prior to crossing.

Oncoming Vehicles

It is important to check the action of the driver when involved in a head-on or sideswipe accident with a vehicle approaching from the opposite directions. Exact location of the vehicles, prior to and at the point of impact, must be fully clarified during the accident review process. Even though an opposing vehicle enters a driver's traffic lane, it may be possible for your driver to avoid the collision. Your driver can take actions to make their presence known such as flashing lights or sounding the horn.

Turning

Turning movements require the most exacting care by a professional driver. Squeeze plays on left or right turns involving other vehicles or pedestrians are the responsibility of the driver making the turn. Failure to signal, to properly position the vehicle for the turn, to check the rear-view mirrors, to check pedestrian lanes or to take other defensive actions should be considered during the accident review. You may find that your driver failed to take precautionary actions from indicators given by the other driver immediately preceding the incident. U-turns by your driver that result in a collision are considered preventable accidents.

Passenger Accidents

Passenger accidents in any type of vehicle are preventable when they are caused by the faulty operation of the vehicle. Even though the incident did not involve a collision, it must be considered preventable when your driver stops, turns, or accelerates abruptly, resulting in an injury to a passenger. Emergency actions taken by your driver to avoid a collision should be reviewed to determine that the action would/did eliminate a vehicle collision. In such cases, injury to the passenger would be considered non-preventable.

Pedestrians

Traffic regulations and court decisions generally favour the pedestrian hit by a vehicle. Unusual route of a pedestrian at mid-block or from between parked vehicles does not necessarily relieve the driver from accident preventability. Whether speed limits are posted or the area is placarded with warning signs, speed too fast for conditions may be involved as contributing factors.

Weather

Adverse weather conditions are not a valid excuse for being involved in an accident. Rain, snow, fog, or icy pavements have never caused an accident. These conditions increase the hazards but do not cause accidents. Failure to adjust driving habits to prevailing weather conditions or to "call it a day" when necessary, should be cause for deciding such accidents are preventable. Failure to use safety devices, such as snow chains when required, contributes to accident preventability.

Alleys, Driveways, and Entrances

Accidents involving traffic originating from alleys, driveways, entrances, and other special intersecting roadways should be carefully analyzed to determine what the driver might have done to avoid the

accident. Failure to slow down, sound the horn, look for hazards, or yield to others can be considered reasons to call an accident preventable.

Fixed Objects

Collisions with fixed objects are preventable. They usually involve failure to check clearances to the side and overhead. The driver is responsible to be on the lookout for such obstacles, to proceed slowly in unfamiliar locations, and use ground-guides if necessary.

Parking

Unconventional parking locations, including double parking, failure to put out warning devices, etc. generally constitute evidence for judging an accident preventable. Rollaway accidents from parked positions normally are considered preventable. This includes unauthorized entry into an unlocked and unattended vehicle, failure to properly block wheels, turn them to the curb, or otherwise secure the vehicle from movement.

Mechanical Failure

Any accident caused by mechanical failure that reasonably could have been detected by the driver, should be considered preventable. It is the driver's responsibility to report unsafe vehicle conditions for repairs and make sure the vehicle is in safe operating condition at all times. When mechanical difficulties occur unexpectedly during a trip, the driver is responsible to report this condition to the company, seeking advice for emergency service. Failure to take precautionary action that results in an accident should be considered a preventable accident. An accident caused by mechanical failure that results from abusive driving should be considered preventable.

Pulling Away from Curbs/Parking

Particular attention should be paid to driver's actions when leaving a parking space or position. Many drivers do not take sufficient time to check for clearances in all directions. This type of accident is considered preventable. Your company's driver training program should be divided into several levels:

1. Initial Training — new employee indoctrination.
2. Refresher Training — updates on routes, cargo, equipment, and regulations.
3. Remedial Training — used when there is a problem of substandard performance.

Your company's driver training program should include the following areas:

- Company rules and policies
- Equipment familiarization
- Routes and schedules
- Defensive driving techniques
- Government regulations
- Cargo handling
- Emergency procedures and warning devices
- Specific concerns or loss patterns

There are two approaches to training: classroom and in-vehicle. Classroom training can be accomplished using either a one-on-one or group approach. This method is useful for company rules, government regulations, routes and schedules, accident and emergency procedures, basic cargo handling methods, and basic defensive driving techniques. In-vehicle training is most effective for equipment familiarization, vehicle inspections, cargo handling and defensive driving. In-vehicle training provides one of the best methods of giving practical instruction to a driver under closely controlled conditions.

Driver Selection:

- Does a definite program for driver selection exist?
- Is it as good as it should be and is it adhered to, or is it mostly on paper and frequently forgotten when busy or short of drivers?

Driver Training:

- Is there a definite training program or is it on a "hit or miss" basis?
- Is the driver's past record checked carefully to determine whether reported experience and knowledge are factual?
- Does the program provide for retraining as necessary when unsatisfactory performance or accidents are identified?

Driver Supervision:

- Are supervisory responsibilities adequately handled, or is there overlapping and occasional friction?
- Are there areas where no one is clearly responsible?
- Can relations with drivers be improved?
- Can routing and scheduling procedures be improved for greater efficiency of operation and greater safety?

Section 6 Right to Refuse Unsafe Work

Policy Statement

Rite-Way Traffic has implemented this policy to inform workers of the written Right to Refuse Unsafe Work plan in the workplace. This ensures the health and safety of workers at the work site. *Management* is responsible for ensuring that the following policy for control, training, personal protective equipment and safe work practices is enforced. Rite-Way Traffic has adopted the following program to ensure that workers have the right to refuse unsafe work without reprimand, receive training on work refusal procedures, the refusal is immediately reported and subsequently documented, and that work stops until concern is addressed.

Right to Refuse Unsafe Work

Rite-Way Traffic ensures *Management* to uphold the right of all workers to refuse or stop any task or operation that they have concerns or questions regarding the control of health and safety hazards.

The refusal can occur if the worker believes there already exists imminent danger to health and safety, if it will cause imminent danger to that or another worker, if operating a tool, appliance or equipment could cause imminent danger, or if workplace violence is likely to endanger him/her.

The worker will not be reprimanded for refusing to perform any activity, or work in any area, if they have reasonable cause to believe that performing the activity or area is dangerous to the worker. Rite-Way Traffic will not tolerate any form of retribution or intimidation towards a worker who exercises the right to refuse unsafe work as long as the worker followed the correct procedures.

Training on Work Refusal Procedures

Rite-Way Traffic requires all workers to be educated on their right to refuse unsafe work, and the procedures for doing so.

Work Refusal Procedures

Workers who exercise their right to refuse work must immediately report the work refusal and the reason for the worker's refusal to their supervisor. Rite-Way Traffic requires that once a work refusal is reported that work must stop, and may not resume until the concern has been addressed. *Management* will ensure no worker accomplishes the task or operate the tool the worker has made the report about until they have investigated and acted to eliminate the imminent danger, or made the determination the report is invalid and informed the person who made the report.

Documenting Work Refusals

Rite-Way Traffic will document all work refusal occurrences. The documented refusal is to be used to learn lessons and ensure corrective measures have been put in place. Management will prepare a written record of the worker's notification, the investigation and action taken. The worker who made the notification will receive a copy of the written record.