SStrategic Transport Ltd.

Health and Safety Management System

LARGE ENOUGH TO SERVE YOU, SMALL ENOUGH TO CARE.

Version 1.0

1-4-2024

Strategic Transport Ltd.

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Strategic Transport Ltd.

1.0 MANAGEMENT INVOLVEMENT AND COMMITMENT

The Strategic Transport Ltd. (STRATEGIC TRANSPORT) Health and Safety Management System (HSMS) applies to all employees of STRATEGIC TRANSPORT. The safety management system is based on an "Internal Responsibility System", whereby every employee and contractor in the workplace has a role to play within the system, and a duty to actively ensure all workers are safe in their work environment.

The HSMS is generally comprised of two components. The first is this HSMS Manual, and set of guiding principles within, which are applicable to all STRATEGIC TRANSPORT activities. Secondly, STRATEGIC TRANSPORT has an Employee and Contractor Safety Handbook (the "Handbook") that reflects the nature of their business.

For the purposes of this manual, all references to STRATEGIC TRANSPORT will include but not be limited to transportation services. Future acquisitions will also be required to comply with and adhere to the terms and conditions set out in the HSMS.

The success of any Health and Safety program requires the participation and commitment of everyone within the organization. The safety responsibilities for Management, Supervisors, Employees, Contractors, and Visitors, are clearly defined in this manual. STRATEGIC TRANSPORT enforces an Internal Responsibility System, recognizing that safety compliance is the responsibility of all employees.

1.1 Corporate Health, Safety and Environmental policy

All employees, contractors and visitors will be made aware of this policy through orientation. This policy will be posted in a prominent place in all offices.

Health Safety and Environment (HSE) Policy Statement

STRATEGIC TRANSPORT is committed to inspiring, motivating, and supporting a corporate HSE culture that aligns to the company mission and values. It is our predominant HSE objective to exceed expectations and prevent losses by providing innovating, safe, and environmentally responsible solutions in all aspects of our business. The following pillars of success set the foundation of this objective:

Competency	Strategic Transport is committed to provide HSE and safe practices training to all our employees. All managers, supervisors, employees, contractors, and visitors will understand and demonstrate HSE and incident response competency as it pertains to their role.
Compliance	Strategic Transport is committed to achieve or exceed compliance with all applicable laws, regulations, and policies. Additionally, Strategic Transport will embrace and support practical and applicable industry recommended guidelines, programs, and practices.
Conservation	Strategic Transport is committed to protecting the environment in all our operational areas. We will innovatively pursue opportunities to reduce the use of resources through the recovery and reuse of usable products where possible.
Consultation	Strategic Transport is committed to open and honest communication with government, regulatory agents, Indigenous communities, and the public with respect to all HSE aspects as it pertains to operations.
Continuous Improvement	Strategic Transport is committed to continuous improvement of our HSE program and will set performance-driven targets to achieve high standards of excellence and tracking of results through annual reviews.

1.2 Roles and Responsibilities

General

Occupational health and safety legislation in all jurisdictions where STRATEGIC TRANSPORT operates outlines the general obligations and responsibilities of the employer, the supervisor, and the worker.

Responsibilities, which apply to every employee, include the following:

- Responsibility to work in compliance with local occupational health and safety acts and regulations.
- Responsibility to use personal protective equipment and clothing as directed by the employer.
- Responsibility to report workplace hazards and dangers.
- Responsibility to work in a manner as required by the employer and use the prescribed safety equipment.
- Responsibility to understand and follow the agreed safe work practices or procedures.
- Responsibility to abide by the hiring client's safe work practices during operations.
- Responsibility to refuse unsafe work (imminent danger).
- Responsibility to advise the hiring client of any unique hazards presented by the contract employer's work, or of any hazards found by the contract employer's work.
- Responsibility to respect the confidentiality of trade secret information when the process safety information is released to them.

Every employee has the following rights and obligations:

- Right to participate in workplace health and safety programs of STRATEGIC TRANSPORT.
- Right to be informed about actual and potential dangers in the workplace.

Responsibility for safety is a requirement for every employee at all levels within STRATEGIC TRANSPORT. All employees have the responsibility to intervene and stop any work that they believe poses a risk to the safety of people, equipment, and the environment regardless of the position or employer of the people involved.

Management

Management is responsible for:

- Supporting an effective and active health, safety, and environmental program.
- Ensuring that managers, supervisors, employees, and subcontractors are trained and competent, and that they abide by all STRATEGIC TRANSPORT policies, procedures, and government legislation.
- Providing resources to ensure that personal protective and safety equipment is available to all employees.
- Encouraging employee involvement in safety by demonstrating a personal commitment to safety, and by being open to all suggestions.
- Ensuring that STRATEGIC TRANSPORT policies and work procedures comply with all government legislation and the requirements of our clients.
- Ensuring that all incidents are reported and investigated, and that corrective actions are undertaken to eliminate any reoccurrence.
- Actively participating in STRATEGIC TRANSPORT safety communications, meetings, and site visits.
- Supporting a workers' right to refuse unsafe work and report imminent dangers.
- Communicating annually to all employees, contractors, and subcontractors STRATEGIC TRANSPORT'S commitment to health and safety, and to improving workplace health and STRATEGIC TRANSPORT'S safety culture.
- Ensuring that programs are in place to support and monitor employees as fit for duty.
- Ensuring that all employees are trained in the work practices necessary to perform their job and to maintain the required safety certification.

HSE Representative

HSE representatives, where required, are responsible for:

- Measuring and communicating the level of effectiveness of the HSMS and improvements, and continuously advising all employees.
- Assisting middle managers, supervisors, and workers with implementation of the HSMS.
- Maintaining a training matrix for all staff to ensure that the required training is identified, scheduled, and executed.
- Cultivating employee involvement in the HSMS by demonstrating a personal commitment to safety, and by being open to all suggestions.
- Developing and managing STRATEGIC TRANSPORT policies and work procedures and complying with all government legislation and the requirements of the owner client contracting STRATEGIC TRANSPORT.
- Planning and executing all incident investigations, as required, by assigned risk ranking, receiving, and filing all documentation, tracking remedial actions, and communicating the lessons learned to all employees to prevent a reoccurrence.
- Provide assistance to claims management personnel, if required for the submittal of all Workers' Compensation Board (WCB) forms for incidents, as required by local and jurisdictional authorities.
- Conducting documented employee job observations and providing positive useful feedback to the employee
- Provide health and safety coaching to all employees and management on how to complete STRATEGIC TRANSPORT health and safety paperwork.
- Auditing, conducting, and identifying corrective actions on regular inspections conducted on equipment, facilities, and workers.
- Coordinating safety meetings with middle managers and supervisors
- Monitoring and ensuring that all employees and contractors receive complete orientation.
- Communicating, supporting, following up on, and actively investigating any situation involving the workers' obligation to refuse unsafe work and to report imminent danger, and communicating the outcome and actions taken because of the investigation back to the worker.
- Review all incidents and near misses and conduct trend analysis on such incidents and near misses.
- Assistance to HR and Management during the assessment of employees fit for duty obligation.
- Participating in HSE leadership training, investigation training, emergency response training, and other updated training courses, as required
- Ensure the required safety training certification is maintained.

Drivers

Drivers are responsible for protecting themselves, fellow workers, the public, and the environment by:

- Attending scheduled safety meetings each month at designated locations.
- Participating in the development and maintenance of the HSMS.
- Reporting all incidents, hazards, near misses, injuries, and illnesses immediately to their supervisors, and providing all information pertaining to the incident to their supervisors to support the incident investigation.
- Participating in all STRATEGIC TRANSPORT training and complying with training requirements in accordance with the training matrix.
- Reporting to work mentally and physically fit for duty.
- Submitting all required documentation as directed by the dispatcher and/or supervisors.
- Only operating equipment and carrying out work for which they have been adequately trained (unless for training purposes) and deemed competent.
- Properly using and maintaining personal protective equipment (PPE) as per manufacturer's specifications.
- Conducting and submitting pre-job hazard assessments or job hazard analysis on all jobs before beginning work.
- Obtaining approval (permits) from the appropriate operating authority before beginning work.

- Understanding and exercising workers' obligation to refuse unsafe work and to report imminent danger immediately to your supervisor or manager.
- Follow the policies, procedures and safe work practices as set forth in the H&S Manual and Employee Handbook
- Maintain and provide completed current safety training certification(s) upon request.

Contractors

Contractors are responsible for:

- Attending scheduled safety meetings at designated locations.
- Reporting all incidents, hazards, near misses, injuries, or illnesses immediately to their supervisor, and the STRATEGIC TRANSPORT on site representative and providing all information pertaining to the incident to their supervisors to support the incident investigation.
- Reporting to work mentally and physically fit for duty.
- Only operating equipment and carrying out work for which they have been adequately trained and deemed competent.
- Properly using and maintaining personal protective equipment (PPE) as per manufacturer's specifications
- Maintaining all facilities and equipment in a clean and orderly manner.
- Conducting and submitting pre-job hazard assessments or job hazard analysis on all jobs before beginning work
- Obtaining approval (permits) from the appropriate operating authority before beginning work.
- Understanding and exercising the workers' right and obligation to refuse unsafe work and to report imminent danger.
- Ensure that all equipment is maintained and operated as per manufacturers recommendations and specifications.
- Maintaining required safety training, WCB premiums, insurance, registration, equipment and vehicle inspections.
- Adopting policies and procedures as set forth in the H&S Manual.

Visitors

Visitors are responsible for:

- Wearing appropriate personal protective equipment and following all instructions of the STRATEGIC TRANSPORT representative who is responsible for the conduct of any visitor(s).
- Provide current safety training certification(s) upon request.

1.3 Internal Responsibility Safety System

The internal responsibility system is the underlying philosophy of the occupational health and safety legislation in all jurisdictions. STRATEGIC TRANSPORT is committed to ensuring that everyone in the workplace - both employees and employers - is responsible for their own safety and for the safety of co-workers.

STRATEGIC TRANSPORT will enact an internal responsibility system to ensure the following:

- Establish responsibility sharing systems.
- Promote a world class safety culture.
- Promote best practices.
- Develop self-reliance.
- Ensure compliance.

Specific targets, goals and objectives will be set annually at the management and personal levels. These will then be reviewed at mid-year and end of the year with everyone.

1.4 Performance Review

All Employees shall be appraised annually for OH&S performance. In addition to other components contained in the G012 Performance Review policy (HR Policy and Procedures Manual) employees will be assessed for their commitment to health and safety. Examples of performance appraisal tools will include letters from employers/mangers, and positive reinforcement from Supervisors, management or clients. Job Safety observations and formal management reviews can also be utilized for safety performance. Each employee will be appraised for Safety and Performance either semi-annually or annually pending their length of employment.

1.5 Competency Programs

STRATEGIC TRANSPORT will conduct regular competency appraisals to ensure all employees have the skills and ability to meet or exceed the expectations of their position. A competency program(s) is required to track employees' progression throughout the HSMS training program and to track the experience and competency levels achieved by the employee throughout their career with STRATEGIC TRANSPORT.

The employee and supervisor must work together to complete the requirements of each competency level. Prior to moving on to the next level in the competency program, the employee will be able to perform jobs and tasks identified within that level of competency. Employees must also meet all the other requirements identified.

Job specific training will be provided for new or transferred employees. All employees must be trained on the tasks they will perform on a regular basis. Prior to being able to perform their job without direct supervision a competent person must verify that an employee is competent to perform their roles and responsibilities before being allowed to work independently

1.6 Progressive Discipline

All employees have implied or explicit obligations to STRATEGIC TRANSPORT as their employer and may be disciplined and possibly dismissed for just cause if they fail to meet these obligations. It is expected that all employees will adhere to the guidelines in our policy and procedure documents (e.g. Alcohol & Drug Policy,

STRATEGIC TRANSPORT Safety Rules, etc.), and generally act in the best interests of STRATEGIC TRANSPORT while performing their duties in a diligent and honest manner. Managers will use a progressive discipline process that serves to correct the behavior, deter others from similar actions, and ensure that standards and expectations are clear.

1.7 Management Communications

The success of STRATEGIC TRANSPORT HSMS is based on STRATEGIC TRANSPORT'S ability to communicate information that affects employee safety, changes in the work conducted, client satisfaction, and legislative compliance.

Safety Meetings: Safety meetings are held regularly to give all employees, contractors, and managers the opportunity to discuss safety concerns that result from incidents or changing conditions, and to introduce improvements to safe work procedures. In addition, safety meetings are to evaluate the effectiveness of STRATEGIC TRANSPORT'S HSMS by:

- Discussing the implementation of STRATEGIC TRANSPORT policies and procedures at the field level.
- Facilitating two-way communication in compliance with legislated standards and the STRATEGIC TRANSPORT health and safety rules.
- Gauging participation through attendance, meeting minutes and the closure of follow up action items.

1.8 Applicable Health and Safety Legislation

Access to all relevant legislation will be made available electronically through our current document management system. This will include federal and provincial/state codes, acts, regulations, directives, and guidelines that are specific to the company or the client. Key Pieces of legislation for all workers to understand are outlined below:

Activity/Operation	Legislation
Right/Responsibility to Refuse Unsafe Work	**Alberta** – Section 35 OH&S Act **British Columbia** – Sections 3.12 and 3.13 of the OH&S Regulation **Saskatchewan** – Division 5 3-31 Employment Act **Manitoba** – Workplace Safety and Health Act W210 - Section 4 **Ontario** – Subsections 43(1) and (2) OH&S Act
Working Alone & Journey Management	**Alberta** - Part 28 OH&S Code 2009 **British Columbia** - Part 4 OH&S Regulation **Saskatchewan** - Part III Section 35 OH&S Regulation **Manitoba** – Part 09 Workplace Safety and Health Regulation **Ontario** – Section 25 OH&S Act
Workplace Violence and Harassment	**Alberta** – Human Rights Act **British Columbia** – Sections 4.24 – 4.31 OHS Regulation and Guideline G-D3-115(1)-3 Workers Compensation Act **Saskatchewan** – Part III Employment Act **Manitoba** – Parts 10 & 11 Workplace Safety and Health Regulation **Ontario** – Section 32.0.1(1)(a) and (c)
WHMIS/GHS	**Canada** – Hazardous products Act and Hazardous Product Regulation **USA** – OSHA Hazard Communication Standard (HCS)

2.0 HAZARD IDENTIFICATION, RISK ASSESSMENT AND CONTROL

1.9 Introduction

The Hazard Identification and Assessment element provides guidance on STRATEGIC TRANSPORT'S process for identifying, eliminating, and controlling hazards to reduce the level of associated risk on STRATEGIC TRANSPORT worksites and associated activities. The hazard identification and assessment process will impact many other elements of the Health and Safety Management System (HSMS). STRATEGIC TRANSPORT employees must be prepared to:

- Apply the hazard identification and assessment process established by STRATEGIC TRANSPORT to assess and communicate hazards in the workplace.
- Report potential process and operational hazards.
- Understand the potential consequences of those hazards.
- Ensure safeguards are in place to prevent, detect or mitigate potential hazards.
- Implement any additional measures required for addressing workplace hazards.

Documented hazard assessments will serve as the foundation of the HSMS and involve the identification of all jobs and tasks performed by employees, the assessment of each task for hazards, and the prioritization of the hazards based on the level of risk. This process will be followed by the implementation of controls for the identified hazards. STRATEGIC TRANSPORT will ensure involvement from affected workers and contractors in the hazard assessment and in the development of controls or elimination of the hazards identified. Workers who are affected by the hazards in the hazard assessment will be informed of the hazards and the methods used to control or eliminate the hazards. STRATEGIC TRANSPORT will ensure that they assess a work site and identify existing and potential hazards before work begins or prior to the construction of a new work site. STRATEGIC TRANSPORT will ensure that any unique hazards or those who could be affected by the work are informed of those hazards and the proposed controls.

Key employees will create an inventory of jobs and tasks, list all jobs within the scope of the business, record the number of workers that perform each job, and list all the tasks performed as part of each job identified. Each inventoried task will then be assessed to determine the potential hazards and associated risk. For each task listed, the identification of any health or safety hazards to which workers may be exposed will be listed. Using the information from the assessment, the tasks are ranked in order of priority, based on the level of risk.

STRATEGIC TRANSPORT will address identified hazards by assigning methods of control to eliminate or reduce the hazard. The most effective controls can be determined based on legal requirements, manufacturers' recommendations, industry best practices, and worker input. Whatever control methods are used, the management team must have a system that allows regular checks to determine whether the controls are working as intended. When hazards are identified, the level of risk must be measured using the prescribed risk matrix. The risk assessment matrix tool is used to evaluate risk based upon the likelihood of an event occurring and potential loss severity. The risk matrix provides guidance for identifying overall risk and to ensure hazard controls selected will effectively mitigate or reduce residual risk to as low as reasonably practicable.

STRATEGIC TRANSPORT management, supervisors, and workers will review this Task Inventory and Formal Hazard Assessment and will update any changes where required. This review will be conducted:

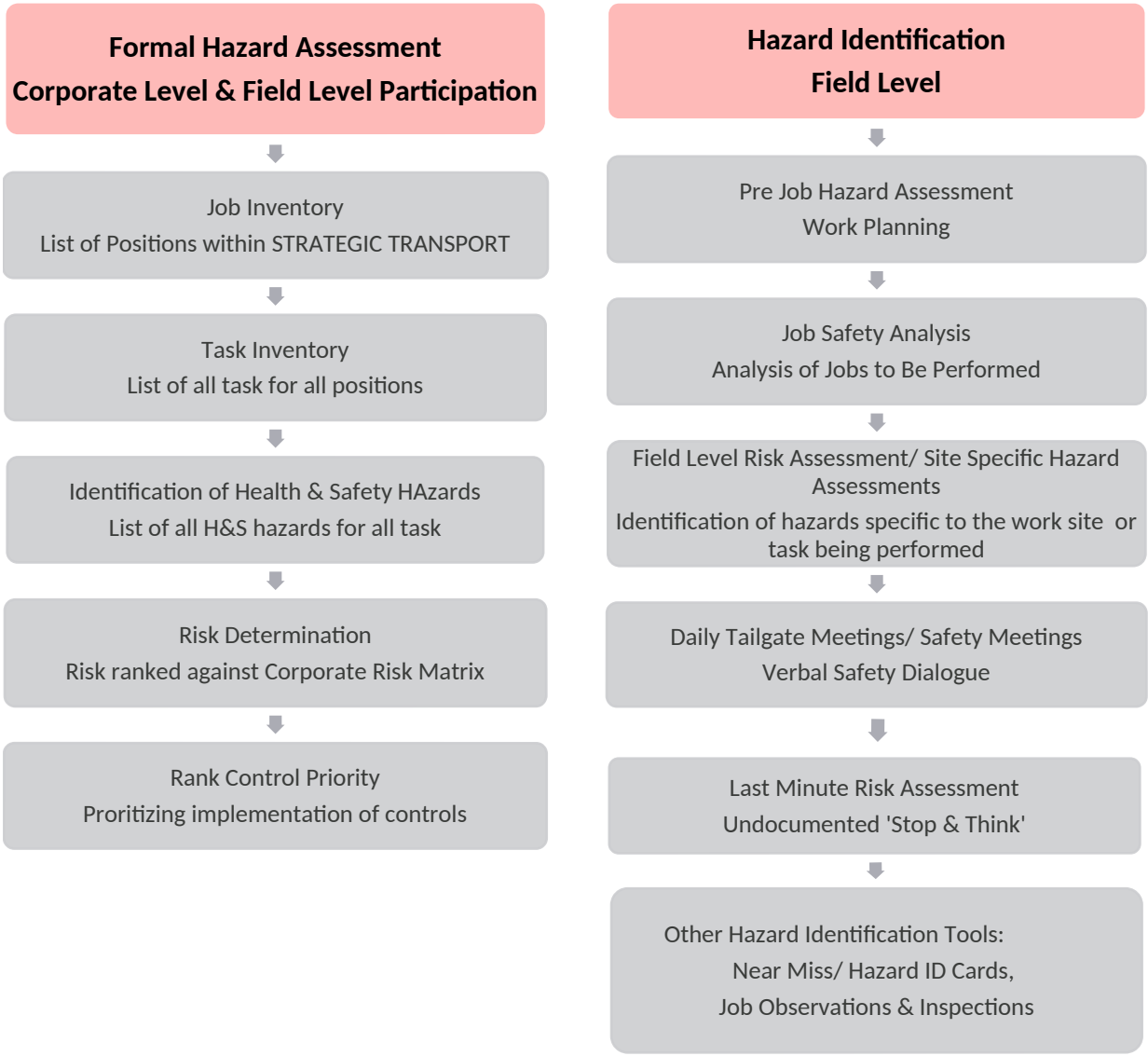
- when new operations, equipment materials or products are introduced.
- when operations or equipment are modified.
- annually at a minimum.

Employees will be trained in the hazard identification process including the use and care of proper PPE.

TOOLS FOR HAZARD IDENTIFICATION

STRATEGIC TRANSPORT has several tools available for identifying and evaluating health, safety, and environmental hazards including:

- Job task inventory
- Job task hazard assessment
- Pre-job hazard assessments
- Job safety analysis
- Feld level risk assessments
- Daily tailgate meetings
- Regular safety meetings
- Near miss and hazard id reports
- Job Observations
- Inspections



- Stop and Think Moments (undocumented)

Job Task Inventory

A job task inventory has been created which lists all positions within STRATEGIC TRANSPORT. It also lists the associated tasks performed for each position, not just those tasks perceived to be safety-sensitive positions. The master task inventory:

- Tracks the assigned responsibilities for completion of the JSA
- Documents the completion and approval dates for completed JSA
- Identifies the required review dates

The Job and Task Inventory is a living document.

Job Task Hazard Assessment

Risk ranking is important for developing, reviewing, and implementing procedures. Job risk ranking will be conducted by a team of employees who are familiar with the tasks and the hazards associated with each job.

To make sure critical jobs are identified and controlled, the first step is to examine occupations or trades at each site. When determining the critical tasks, consider the following:

- What is the risk?
- Is there a possibility of major loss if the job is not done properly?
- How seriously can someone be injured if the task is not performed properly?
- Will it affect others in the organization?

JTHAs must be completed for all jobs / tasks performed as part of normal business operations. For existing jobs, the JTHA will be completed based on the overall assigned level of risk in the following order:

- Tasks with a high frequency of incident or near misses
- Tasks associated with a previous serious incident or fatality
- Tasks with the potential to cause serious harm to people, property, and the environment
- All other tasks

Pre-Job Hazard Assessments

Pre-job hazard assessments form a critical part of good work planning. Effective work planning ensures that the scope of work is understood, all appropriate materials are available, all hazards have been identified, and reference to necessary sections of the H&S manual, procedures manual and JTHA have been made. Finally, all affected, and potentially affected employees understand their roles and responsibilities.

Job Safety Analysis

A Job Safety Analysis or a JSA is a means of carefully studying and recording each step of a job, identifying existing or potential job hazards (both safety and health), and determining the best way to perform the job to reduce or eliminate these hazards.

To truly understand this process, we must first know what a hazard is.

Hazard - A hazard is the potential for harm. In practical terms, a hazard often is associated with a condition or activity that, if left uncontrolled, can result in an injury or illness. Identifying hazards and eliminating or controlling them as early as possible will help to prevent injuries and illnesses.

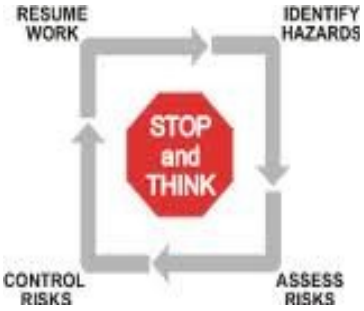
A Job Safety Analysis is a technique that focuses on job tasks to identify hazards before they occur. It focuses on the relationship between the worker, the task, the tools, and the work environment. Ideally, after you identify uncontrolled hazards, you will take steps to eliminate or reduce them to an acceptable risk level.

Field Level Risk Assessments

A Field Level Risk Assessment (FLRA) is to be used to assess risk and develop controls when a low-level risk is introduced that was not discussed or addressed at the morning tailgate meeting and there is no referenced Job Safety Analysis. Another use for the FLRA is when you have a JSA with multiple crew members and provides a tool to allow crew members to clarify and focus their individual tasks.

Stop and Think Moments

Stop and Think moments are an undocumented process and provides a platform for employees to stop and think immediately prior to commencing work on a specific task. Stop and Think moments ask what hazards exist, what controls are in place, and whether the controls in place are sufficient to mitigate all potential risks which may be posed by the task.



Tailgate Meetings

At the start of every shift, tailgate meetings serve to outline the scope of work for that shift; alert employees to workplace hazards as well as provide an opportunity to verbally engage employees in health and safety dialogue. These meetings also provide the opportunity to discuss hazard identification reports, near miss reports, and the results of recent incident investigations to provide learnings to all employees.

Regular Safety Meetings

Regular safety meetings are an integral part of the HSMS at STRATEGIC TRANSPORT and serve to: encourage increased safety awareness across all departments, actively involve all employees in the HSMS, provide an opportunity for health and safety training and roll-out of HSMS initiatives, introduce employees to new safety rules, equipment, and practices, and provide vital information on hazards identified, near misses reported, and near miss and incident investigation results.

Near Miss and Hazard Identification Reports

Near miss and hazard identification reports provide crucial information and have been proven to prevent incidents when reported, investigated, and recorded for statistical purposes and incident analysis.

STRATEGIC TRANSPORT is committed to a non-fault reporting process, and requires the reporting of all types of incidents, no matter how minor or insignificant they may seem. Lessons learned from Near Miss and Hazard Identification are critical to the continual improvement of the STRATEGIC TRANSPORT HSE system.

Job Observations

Job Observations and the feedback they provide are an integral component of the behavior-based safety program at STRATEGIC TRANSPORT. Observations provide direct, measurable information on employees' work practices identifying both safe and unsafe behaviors. It has been proven that frequent, objective, positive feedback is essential in maintaining any safe behavior. In the job observation process, the employee being observed is provided with positive feedback on their safe behaviors, and nonthreatening, instructive feedback on how to correct any questionable behaviors that were observed.

Upon completion of an observation, the observer is expected to have a discussion with the observer to get feedback.

The observer will:

1. Review the JSA or Safe Work Procedure that governs the workers' task
2. Start with a positive comment
3. Reinforce safe behaviors observed first
4. Describe and discuss questionable behaviors – try not use the phrase unsafe but rather questionable
5. Solicit from observed employee explanation of his/her behaviors with open-ended questions
6. Re-emphasize no consequence to observed employee

Training will be provided on the observation process, which will include how to conduct the observation, how to complete the observation form, what does the behavior mean, feedback training and role-play.

This training will include:

1. Program objectives and incident metrics reviewed
2. How to conduct the observation
3. How to complete the observation form
4. What do the behaviors mean?
5. Feedback training and role play (mentoring and coaching)
6. Employees should be aware they may be observed at any time

Corporate Safety, as well as the company, will compare these measurements and track these results by an acceptable method so that numerical and statistical comparisons can be made over time. Trending of safe and unsafe behavior will be conducted so that specific action plans can be developed.

Once trend analysis is complete, appropriate action plans must be developed to address unsafe behaviors.

Action planning will include:

1. Evaluate unsafe behaviors from trend analysis and prioritize
2. Develop action plan for unsafe behaviors based on comments and feedback from data sheets
3. Designate responsible parties and timeframes within the action plan
4. Define who is responsible for action planning
5. Ensure management support

1.10 Risk Assessment & Prioritization

Risk refers to the chance that harm or loss will occur, and how severe the outcomes will be because of the hazard. All hazards have risk, but some hazards pose a greater risk than others do. Once the degree of risk for each hazard has been assessed, the hazard can be prioritized. Hazards that have a greater risk need to be assigned a higher priority for either eliminating the hazard or developing effective control measures for that hazard. The STRATEGIC TRANSPORT Risk Matrix prioritizes hazards based on how likely it is to result in a loss (probability), and how great the potential loss could be (severity).

Consideration for controlling the identified hazards should be given to the hierarchy of controls. The risk control measure selected must be the highest possible option within the hierarchy to reduce the risk to the lowest level as reasonably practicable. Existing controls should be re-evaluated to determine if the most appropriate control measure is in place. In many cases, it will be necessary to use more than one control. Back-up controls, such as PPE, should only be used as a last resort.

Definitions of terms are listed at the end of the section.

Assignment of Risk
When hazards are identified, the level of risk posed by the hazards must be measured using a risk matrix. Table 1 below provides in-depth descriptions of both severity of consequence and probability (likelihood) of occurrence to provide consistency to the process.

Severity of Consequence Description
STRATEGIC TRANSPORT defines the severity of consequence using a numbered system from one through four with one being the lowest or minor and four being the highest or most critical. Specific definitions are in Table 1 below.

Probability of Occurrence Description
STRATEGIC TRANSPORT defines probability of occurrence using a numbered system from one through four with one being not likely to occur during life cycle, but possible (yearly or more) and four being expected to occur with regularity at a facility or field (daily).

Risk Matrix
STRATEGIC TRANSPORT uses the risk assessment matrix located below to evaluate risk based upon the probability of an event occurring and potential loss severity. The matrix provides guidance to quantify overall risk and assurance that the hazard controls selected will effectively mitigate residual risk to acceptable levels.

Residual Risk and Required Approval
In events where residual risk remains, the required approval authority for residual risk level is detailed below in the risk classification portion of the risk matrix.

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Table 1: STRATEGIC TRANSPORT Risk Matrix

Severity of Consequence					Risk Determination (Risk = Severity X Probability)			
For People/ Assets	For Environmental	For Financial	For Public	Level				
• Fatality(ies) • Permanent Disability • Multiple LTI's	• Spill volume >160m^3 • Major impact to neighboring receptors (public, streams, water bodies, vegetation, air, ground water etc.).	• Production, facility, and/or equipment loss > $1.5M	• Impacts >100 or more people • National attention / federal code violation(s)	**4** Critical	4 (moderate)	8 (moderate)	12 (high)	16 (severe)
• Lost Time Injury • Lost Time Illness	• Spill volume 20 to160m^3 • Effects confined to operating field • Effects to non-fish bearing bodies • Offsite; repeated noncompliance issues or one lost time incident with long term significant impact.	• Production, facility, and/or equipment loss $500k - $1.5M	• Impacts 25 – 100 people • • Provincial/State Attention / code violation(s) • Provincial/State Media attention	**3** Serious	3 (low)	6 (moderate)	9 (high)	12 (high)
• Medical Aid • Restricted Work	• Recordable spill < 20m3 • Effects off lease but localized • Odors off lease but localized	• Production, facility, and/or equipment loss $100k - $500k	• Impacts < 25 people • Municipal or community attention / code violation(s)	**2** Moderate	2 (low)	4 (low)	6 (moderate)	8 (moderate)
• First Aid	• Contained at source, no significant environmental impact. Release volume below reportable levels / volume.	• Production, facility, and/or equipment loss < $100k	• Impacts 1 or 2 people • Negligible attention	**1** Minor	1 (low)	2 (low)	3 (low)	4 (low)

Severity (Based on 'Reasonable Expectations' - How bad can it get?)

Residual Risk & Required Approvals		Probability (Based on 'Reasonable Expectations' - How likely is this to result in a loss?)			
		1 Remote	**2** Occasional	**3** Probable	**4** Frequent
Severe 13 – 16	STOP activities, work cannot proceed until risk is reduced to a lower level. Extensive mitigation must be implemented and Executive/ Senior Management approval is required to allow work to proceed	• Not likely to occur during life cycle, but possible • May happen Yearly or more	• Likely to occur sometime during the life of a project • May happen Monthly	• Likely to occur several times in the life of a project. • May happen Weekly	• Expected to occur with regularity at a project. • May happen Daily
High 9 - 12	STOP activities, work cannot proceed until risk is reduced to a lower level. Mitigation must be implemented and Manager approval is required to allow work to proceed.				
Moderate 5 - 8	Risk controls/ mitigation measures must be implemented to allow work to proceed. Efforts to reduce to a Low level should be undertaken. Supervisor or Supervisor equivalent approval is required to allow work to proceed.				
Low 1 - 4	Some risk controls/ mitigation measures may be justified. Represents an acceptable level of risk. No approval required.				

1.11 Hazard Control

HAZARD CONTROL HIERARCHY In order of Preference		
CONTROL	**DEFINITION**	**EXAMPLE**
Elimination	Removing the hazard	Taking a hazardous piece of equipment out of service.
Substitution	Replacing a hazardous substance or process with a less hazardous one.	Replacing lead paint with versions that do not contain lead. The goal is to choose a new chemical that is less hazardous than the original.
Engineering	Redesigning a process or piece of equipment to make it less hazardous.	Process control, Enclosure and/or isolation of emission source Ventilation, guards.
Isolation	Isolating the hazard from the person at risk.	Locking out an electrical panel when working on a pump.
Administrative	Adopting safe operating procedures (SOP), Job Safety Analysis (JSA) or safe work practices (SWP), or providing appropriate training, instruction, or information.	Safe Work Practices, Safe Operating Procedures, JSA's, signs, rules, training, equipment maintenance, and personal hygiene practices.
PPE	Providing and using personal protective equipment.	Includes gloves, eye protection, hearing protection, safety footwear, and respiratory protection.

Controls must be developed in accordance with the Hierarchy of Controls (above) and to meet legislative requirements. Workers affected by the hazards must be included in the control process. Once a hazard is controlled and meets these requirements it must be monitored and evaluated regularly.

Hazard Control Hierarchy
There are four accepted methods used for hazard control referred to in the legislation. Ideally, the goal is to eliminate the hazard. When not practicable, the hazard must be controlled through a combination of methods to reduce the risk to acceptable levels.

All employees must take responsibility for identifying, assessing, and controlling hazards through the methods detailed in this section of the HSMS.

1.12 Hazardous Materials

Employees have the right to know the safety and health hazards that they may be exposed to while handling or working near controlled products. STRATEGIC TRANSPORT has developed a Workplace Hazardous Materials Information Systems (WHMIS) or a Global Harmonized System (GHS) program to establish consistency regarding compliance with legislation applicable to all worksites.

Workers will be provided with training on the chemical and biological hazards they may be exposed to. If a worker is or may be exposed to a chemical or biological substance which could cause an adverse health effect, STRATEGIC TRANSPORT will ensure that the identity of the substance, it's possible effects on worker health and safety and any precautions required to protect the health and safety of the worker are clearly communicated to the worker.

On the worksite hazardous materials will be properly labeled and the applicable Safety Data Sheets will be available.

Safety Data Sheet: All controlled products require an SDS.

A binder with paper copies or an electronic version of the MSDS/SDS for each controlled product on site will be maintained and available to all personnel that could be exposed to the various chemicals-controlled products on site.

Storage of Hazardous Materials: Ensure that any hazardous materials on a work site are properly stored to protect workers, and persons in the vicinity, and to prevent damage to STRATEGIC TRANSPORT property. Consider the characteristics of materials that are to be stored. Store incompatible substances in separate areas as they could react violently with others.

Store all hazardous materials in proper containers to minimize the potential of a spill. Chemicals must be stored in sealed containers and stored so they are not exposed to storm water. If you have any questions, please ask the management, or refer to the legislative requirement of your jurisdiction.

Codes of Practice/Exposure Control Plans for Chemical Hazards: Provinces and States in which STRATEGIC TRANSPORT operates require an employer to have a written code of practice/exposure control plan for prescribed chemicals and the associated hazards.

Chemical hazards for which a code of practice is required include chemicals present in a product (such as crystalline silica in drilling mud containing quartz or asbestos in the demolition of buildings) or as part of an operation or process (such as benzene or NORMS in oil and gas operations)). Chemical hazards can be raw products at the start of a process, by-products generated at any stage of a process or the finished product itself.

To prepare a code of practice, the hazards of the chemicals present must be known. The hazard assessment needs to be reviewed on a regular basis and revised if conditions change at the work site, when new work processes are introduced, or work processes or operations change. The employer must involve workers who may be affected by the hazards.

The code of practice must identify locations at the work site where workers could be exposed to chemical hazards. The code of practice must be maintained and periodically reviewed to ensure that its procedures are up-to-date and continues to reflect the work activities for which it was originally written.

There are two basic steps when preparing a code of practice for chemical hazards:

- Identify chemical products at the work site for which a code of practice is required.
- Develop the code of practice.

To determine whether the products contain one or more of the target substances, STRATEGIC TRANSPORT will refer to ingredient information, the product MSDS/SD, other information from the manufacturer or information on similar products. In some cases, if the product is made on site or information cannot be found, chemical analysis may be required.

A code of practice contains more than just safe work procedures. It also includes information on:

- Controls used to protect workers.
- Measures to be taken to prevent releases.
- First aid procedures.
- Emergency procedures.
- Decontamination procedures.
- Waste handling practices.
- Monitoring and follow-up.
- Worker training requirements.
- Site contacts.

A code of practice is a living document and must be revised if conditions at the work site change.

3.0 RULES, POLICIES AND PROGRAMS

1.1 Rules

1. All unsafe acts, conditions, accidents, injuries, including "near misses", regardless of their nature, shall be promptly reported to the Health & Safety Representative/ Supervisor/ Manager.
2. First aid treatment is to be obtained promptly for any/all injuries and the appropriate documentation filed.
3. Smoking is permitted only in designated areas. "STRIKE ANYWHERE" matches and single action lighters without enclosed mechanisms are prohibited.
4. Hand tools shall not be used for any purpose other than that intended. All damaged or worn parts shall be promptly repaired or replaced. Only those tools that are in good repair, with all guards and safety devices in place, shall be used. All electrical hand tools shall be grounded or double insulated.
5. Only authorized competent personnel will operate power tools, with guards furnished by the manufacturer "in place".
6. Only persons who have been instructed and trained in their safe use shall use explosive/power actuated tools.
7. Compressed gas cylinders shall be secured in an upright position.
8. Riding on equipment is prohibited. No person shall ride any hook, hoist, or other material handling equipment, which is used strictly for handling material and not specifically designed to carry riders.
9. Possession or use on the job of intoxicating beverages or drugs is strictly forbidden and constitutes grounds for DISMISSAL.
10. Theft, vandalism, harassment, violence, or any other abuse, constitute grounds for DISMISSAL.
11. All work shall be carried out in accordance with appropriate safe work practices and procedures.
12. Every worker shall keep his/her transporter clean, neat, and orderly. Housekeeping is mandatory.
13. Prompt and efficient first aid service shall be available to all workers.
14. Before using, transporting, storing, or disposing of any chemical, all workers will ensure that all safety precautions associated with the specific products and legislation are followed.
15. When working near electrical facilities, workers shall not exceed the “safe limit of approach”.
17. All operators and passengers in STRATEGIC TRANSPORT vehicles and equipment will wear seat belts. All vehicle operators will obey speed limits.
18. Unsafe tools will not be used and will be tagged out of service. Any damage to tools or equipment will be reported immediately.
19. Facial hair must be trimmed so it will not interfere with obtaining a seal on air masks and respirators.
20. Head Hair should not extend below the collar. Hair will be required to be tied up if longer. Sideburns should not extend more than ½” below ear lobes and be neatly trimmed.
21. Firearms are strictly prohibited on all STRATEGIC TRANSPORT sites and facilities unless specific written authorization is granted for specific situations like wildlife monitoring.
23. No fighting or horseplay is allowed.
24. No making false statements.

Violation of any of the above safety rules will result in one of the following corrective measures: Caution, Reprimand, Suspension, Demotion, or Dismissal.

1.2 Fitness for Duty

Concern for the health, safety and well-being of our employees, our customers, the public and the environment will continue to be a major commitment of STRATEGIC TRANSPORT. STRATEGIC TRANSPORT recognizes alcohol and drug use in relation to the workplace as a health, safety and security problem and expects all employees to assist in maintaining a work environment that is free of alcohol and drugs. Accordingly, as a term and condition of employment and/or the privilege of entering onto, remaining on STRATEGIC TRANSPORT client premises, or performing STRATEGIC TRANSPORT work, it is important to note the following:

- The STRATEGIC TRANSPORT Drug and Alcohol Policy and Fitness for Duty Policy will be communicated to employees and contractors during their initial on-boarding orientation and any updates will be communicated to the workforce on an as required basis.
- All employees are expected to be fit for duty (physically and mentally) and in a condition to carry out their assignments and responsibilities. It is therefore a violation of this Policy for employees to work or to be on STRATEGIC TRANSPORT client premises while under the influence of alcohol or unauthorized, prohibited, illegal or controlled substances.
- Workers must be physically capable of performing their job tasks. A Physical Demands Analysis (PDA) will be prepared for each job duty to ensure workers are placed accordingly.
- The consumption, use, manufacture, dispensation, possession, distribution, purchase, sale, transportation, concealment, transfer, or storage of unauthorized, prohibited, illegal or controlled substances and/or substance-related paraphernalia while performing STRATEGIC TRANSPORT work, on STRATEGIC TRANSPORT assignment or on STRATEGIC TRANSPORT premises (including STRATEGIC TRANSPORT owned or leased vehicles), is strictly prohibited.
- It is the employee's responsibility to make sure that when they are using prescription or over-the-counter products (whether physician-approved or not) that these products do not affect work performance by altering the mind, mood, behavior, emotions, reasoning performance or physical job functions. Prescriptions and over-the-counter products are to be kept in the original container clearly marked with all pertinent information about usage, date, employee's name, prescribing physician's name, and prescription number. They are to be used in a manner consistent with the instructions of the prescribing physician or as documented in the manufacturer's instructions.
- An employee whose off-duty involvement with unauthorized, prohibited, illegal or controlled substances becomes known to STRATEGIC TRANSPORT may be in violation of this Policy; depending on any adverse effect the employee's actions may have on STRATEGIC TRANSPORT or STRATEGIC TRANSPORT'S reputation.
- Any suspicion of unauthorized, prohibited, illegal or controlled substances or substance related paraphernalia on STRATEGIC TRANSPORT / client property may be reported to appropriate law enforcement authorities.
- All contractors, visitors, vendors, consultants, or other individuals working on STRATEGIC TRANSPORT client property or assignment must comply with this Policy. While STRATEGIC TRANSPORT has no direct control of contractor employees or any outside vendors, these persons can affect STRATEGIC TRANSPORT'S employees, property, and STRATEGIC TRANSPORT reputation. Any contractor employee, consultant or vendor found or suspected to be in violation of this Policy will be dealt with through the appropriate contractor management and will be denied access to the jobsite or work assignment by STRATEGIC TRANSPORT. Visitors found to be or suspected to be in violation of this Policy will also be denied access to STRATEGIC TRANSPORT property. Worker's behavior will be always monitored and those who exhibit unsafe behaviors will be removed from duty.
- Violations of this Policy may result in disciplinary action up to and including termination of employment.
- It is important that each employee understands the details of this Policy and STRATEGIC TRANSPORT'S commitment to have a safe and substance free workforce and workplace. Employees are encouraged to contact their immediate supervisor if they have any questions regarding this Policy.

ALCOHOL AND DRUG TESTING
Human Resources Policy ST01

1.3 Personal Protective Equipment Standards

The personal protective equipment (PPE) used must be stated in the job hazard assessment and the employee must ensure that it complies with STRATEGIC TRANSPORT rules and does not endanger him/herself at any point of a task.

All PPE used must be in good condition and maintained according to the manufacturers' recommendations.

No piece of PPE shall be modified or changed contrary to manufacturers' instructions, specifications or in violation of local OH&S laws.

Workers are responsible to use or wear PPE where designated. STRATEGIC TRANSPORT commits to providing all necessary PPE to the workers except for approved footwear which is the responsibility of the worker.

All PPE that is of questionable reliability, damaged or in need of repair or service shall be taken out of use and labelled "Out of Service" until repaired or replaced.

All employees will be trained in the selection, care, maintenance, and use of all PPE equipment and will abide by the manufacturer's recommendations in the use and care.

Failure to use designated PPE as directed will be subject to STRATEGIC TRANSPORT discipline policy which could include discipline up to and including termination of employment.

All PPE must be ANSI/CSA-approved and is separated into two categories: basic PPE and job or site-specific PPE.

Basic PPE Requirements: Basic PPE must always be worn and used by all employees and contractors on STRATEGIC TRANSPORT and client worksites. Basic PPE consists of head protection, hand protection, foot protection, eye protection, hearing protection and protective outerwear as determined by the pre job hazard assessment.

There are 3 exceptions only to when the requirement for basic PPE would not be required, if these exceptions are not applicable then basic PPE is required:

1. When inside office buildings.
2. When inside a designated 'PPE Free Zone'.
3. When the completed documented Hazard Assessment deems items of basic PPE not necessary.

Head Protection: Hard hats must be CSA or ANSI class B rated standard Z94.1-05 or Z89.1 2003 ANSI, non-conducting high impact plastic and shall be always worn with the following exceptions:

- When traveling inside vehicles or equipment.
- When any of the basic PPE exceptions apply.

Metal and novelty hard hats are prohibited.

If hard hat liners are used, they shall be manufactured out of fire-retardant materials.

If there is a possibility of impact of falling material to the side of the head, a Type II side impact hard hat shall be worn (i.e.: demolition activities).

A chinstrap is to be used if the hat is likely to be dislodged.

Hard hats are to be replaced if they are cracked, weather worn or in service for more than 5 years.

Hand Protection: Gloves must be worn on all STRATEGIC TRANSPORT and client worksites. The hazard assessment for the task must identify the specific hand protection required.

The gloves must be suited to the type of work and the work environment in which the work is being performed.

Five key types of work must be considered when choosing gloves.

- **Working with Chemicals:** Workers must wear chemical-resistant gloves. Gloves may be fitted with insulation or liners during cold temperature work.
- **Working with Sharpe Objects/Tools:** Workers must wear cut-resistant, steel mesh or Kevlar gloves.
- **Working with steam and other materials that can cause burns:** Workers must wear gloves made from special materials suited to the job's heat hazards.
- **Cold Temperature:** Workers must wear insulated leather gloves when doing impact or general work when temperatures are too low for impact-resistant gloves.
- **General Work:** Workers must wear hand protection appropriate for the task and material being handled (e.g., impact-resistant gloves when impact is identified as a hazard).

Foot Protection: All STRATEGIC TRANSPORT employees and contractors must wear OSHA/CSA Grade 1 (green triangle) ankle-high approved footwear appropriate to the hazard and weather conditions when working on all STRATEGIC TRANSPORT and client work sites.

Note: Footwear must be laced to the top of the boot and tied securely.

Eye Protection: All STRATEGIC TRANSPORT employees and contractors must:

- wear ANSI/CSA-approved eyewear while outside of a vehicle or on a worksite
- Use approved eye protection when lighting or looking into gas-fired equipment, when around rotating equipment, or during activities where foreign matter (solid or liquid) could enter the eye
- Maintain eyewear in a manner to permit maximum visibility.
- Visitors must be provided with eye protection, when needed.
- Employees/contractors are prohibited from wearing contact lenses unless they have been provided medical clearance to do so and have met certain site conditions.
- Prescription glasses may be used if they are made of tempered glass and are CSA or ANSI approved with the proper side shield protection. Alternatively, an employee/contractor may use a google or OTG (Over the Glasses) form of safety glasses that fit over the prescription glasses.
- Safety glasses are to be cleaned regularly and checked before each use for cracks, scratches, pits or fading.

Defective glasses are to be removed from service and replacement eyewear obtained.

Hearing Protection: All STRATEGIC TRANSPORT employees and contractors must wear hearing protection in any area where:

- the noise level is greater than or equal to 85 dBA.
- "Hearing Protection Required" signs are posted.
- Dual protection plugs/earmuffs are required where the noise levels are greater than or equal to 104 dBA.

Protective Clothing – Fire Retardant: Workers that can potentially be exposed to flash fires must wear flame resistant clothing. Fire-retardant outerwear is mandatory on all STRATEGIC TRANSPORT and client worksites.

Fire-retardant outerwear must:

- meet the performance requirements of CAN/CGSB 155.20-2000.
- meet the requirements of WCB Standard: PPE 2 High Visibility Garment, July 1997 (BC).
- Include a high-visibility vest or reflective striping of sufficient size and length to meet local legislative requirements.
- Beneath the fire-retardant clothing layer, employees must wear flame-resistant fabrics or natural fibers that will not melt when exposed to heat.
- Restricted clothing includes loose clothing, long hair, dangling accessories, rings, watches, piercings, and bracelets.

Job- or Site-Specific PPE: Job- or site-specific PPE may be required in accordance with the hazard assessment, the job or task to be performed, the conditions surrounding the job or task, or client's requirements. Job- or site-specific PPE must be recorded on the hazard assessment.

Examples of job- or site-specific PPE include:

- Hearing protection (earplugs, earmuffs)
- Additional outerwear clothing (welding aprons, chainsaw pants, chemical suits, or aprons)
- Head protection (off-road vehicle helmets)
- Hand protection (rubber and gauntlet-style gloves)
- Protective footwear (boots for cold weather and electrical work)
- Eye protection (goggles)
- Face protection (face shields, welding hoods)
- Respiratory protection (NIOSH-approved full-face or half-mask particulate and gas/vapor respirator, assisted-breathing equipment, disposable form-fitting toxic dust mask [mechanical filter], chemical cartridge)
- Supplied Air Breathing Apparatus
- Personal monitors (H2S, LEL, CO2 and O2)
- Fall protection 5-point (harnesses with lifelines)

Employees' Responsibilities

STRATEGIC TRANSPORT employees are responsible for:

- providing suitable innerwear clothing needed to protect against the natural elements
- providing and proper foot protection (PPE Allowance)
- where required prescription safety glasses (PPE Allowance)
- cleaning, maintaining, and storing PPE in accordance with the training and instruction provided
- inspecting the equipment before use
- refraining from wearing protective equipment outside of the work area where it is required if to do so would constitute a hazard
- reporting any malfunction to the supervisor
- reporting to the supervisor any worn PPE that is needed to be replaced

Employers' Responsibilities

STRATEGIC TRANSPORT is responsible for:

- providing all other required PPE
- Ensuring a Pre Job Hazard-Assessment has been conducted to determine the appropriate PPE (basic or specialized) necessary for the proposed scope of work.
- Providing appropriate alternate equipment or safe measures in cases where the PPE provided by STRATEGIC TRANSPORT causes allergenic or other adverse health effects.

Selection of PPE

PPE should be selected based on the following information:

- Hazard Assessment.
- Material Safety Data Sheet (MSDS) or Safety Data Sheet (SDS).
- External requirements (when directed).
- Legislative Requirements.

Storage of PPE

PPE should be stored to protect against environmental conditions that might reduce the effectiveness of the equipment or result in contamination during storage. PPE having a shelf-life limitation shall be checked periodically to ensure compliance with the expiration dates.

Maintenance of PPE

It is the workers responsibility to inspect all PPE prior to use. If PPE is found to be damaged and requiring replacement, the worker must advise the supervisor immediately and remove the defective PPE from service, tagging it out as defective.

- PPE, including employee-owned PPE must be maintained in a sanitary and serviceable condition. PPE requiring specialized servicing as required by the manufacturer will be serviced only by qualified personnel.
- Care instructions of PPE can usually be found attached to each item, if workers are unsure, they are required to talk with their supervisor.
- PPE issued for exclusive use by an individual shall be visually inspected for defects or wear by the worker before each use. Such PPE may be inspected frequently by the supervisor to ensure its serviceability.
- PPE subject to use by more than one individual should be disinfected by prior to reuse.
- PPE intended for emergency use shall be cleaned, disinfected, and placed in an operable condition after each use by the last individual to use it. Such equipment will be inspected MONTHLY to ensure it is in serviceable condition. Records shall be kept of these inspections.

1.4 Journey Management Program

H&S Responsibilities

- The H&S Manager (or designate) is responsible for maintaining the journey management program and related procedures.

Managers

- Responsible for the implementation and maintenance of the journey management program for their team and ensuring all assets are made available for compliance with the program.

Employees

- All shall be familiar with this program and the local workplace vehicle safety program.

- Another individual is aware of the driver's trip itinerary. Employees should notify their supervisor or a recognized designate who is not traveling with them of their travel plans. This includes where they are going, when they should be getting there and when they plan to return.
- Drivers must carry a reliable method of communication (cell phones, CB radio, etc.) in case of emergency. Drivers should always carry a cell phone, especially when traveling in rural areas. Consider subscribing to an in-vehicle communication/ remote diagnostic service (e.g. On-Star) if the vehicle is equipped with one. SPOT devices will be provided for areas where a worker may be out of cell phone range.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.

1.5 Journey Management Plans

When making a road journey, whether it's for business or pleasure, your chances of arriving safely are greatly increased by careful planning. Fail to plan adequately and your chances of being involved in an incident will increase.

A Journey Management Plan is typically a set process that you follow for planning and undertaking road transport journeys in compliance with HSE requirements, with the goal of arriving safely. The Journey Management Plan shall be reviewed with affected employees. The Journey Management Plan should be reviewed with road travelers before they perform any driving on STRATEGIC TRANSPORT business. A copy of the plan must be readily available at the workplace. Road travelers should carry a copy of the plan.

Simple Steps to Safety
Consider each element of your journey before you set off:

- Define your route.
- Make sure you can stay in communication.
- Plan your rest periods and locations.
- Think about the timing of your journey and how busy the roads will be.
- Identify black spots/route hazardous spots.
- Consider the route options – different types of roads.
- Check the road and weather conditions.
- Identify high risk locations such as schools.
- Personal welfare – keep hydrated with non-caffeine drinks.
- Time your journey and allow extra time to account of unexpected delays.

Driving directions shall be obtained before traveling to an unfamiliar destination. Before taking a trip to an unfamiliar location each employee will ensure they have printed driving directions available. Do not plan to read directions from a smartphone while driving. A GPS device may be used, but printed directions should be kept as a back-up.

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

- Road travel should be limited whenever practicable. Road journeys should only be taken when necessary. Try to complete multiple tasks in single trips to reduce the amount of driving for improved safety and efficiency. If the trip is being taken to meet with someone, determine if the meeting can be done over the phone instead.
- Consider safer methods of travel (air, train, etc.) where practicable.
- Can the business requirement for a potential journey be delayed and possibly combined with a later trip?

Driving during adverse weather conditions should be avoided, whenever practicable. Before leaving on a trip, ensure that weather conditions are safe for driving. Ensure the vehicle being used is adequate for the weather conditions. Make sure emergency supplies are in the vehicle, and the driver has a cell phone in case of emergency. In particularly

harsh conditions, consider cancelling or rescheduling the trip. Consider the following questions and guidelines when adverse weather conditions are present:

- Can the journey be combined with other people to share a vehicle?
- Road travel is completed during daylight hours, whenever practicable. Driving should be done during daylight hours rather than after dark whenever possible. Reduce speed when driving at night. Be aware of the potential for wildlife to be on the road, especially when driving at dusk or dawn.
- Rest breaks should be taken to reduce fatigue. When driving long distances sufficient breaks should be taken to prevent fatigue. When driving alone and having trouble staying awake, pull off the road and get out of the vehicle for fresh air, or take a power nap. If driving late at night, consider getting a hotel room and starting fresh the next day. If two licensed drivers are in the vehicle, take turns driving. Get plenty of rest before beginning your journey.

1.6 Vehicle Operations Requirements

- Operators of STRATEGIC TRANSPORT or clients on or off-road vehicles shall be qualified by possession of a valid, current driver's license for the type of vehicle being driven.
- When parking drivers should make every effort to park the vehicle in a manner that allows the first move when leaving to be forward.
- Drivers must have either a reversing alarm, use a spotter, inspect the area, or walk around the truck/trailer prior to backing.
- Passenger compartments are to be free from loose objects that might endanger passengers in the event of an incident. Any vehicle with non-segregated storage shall be equipped with a cargo net or equivalent to separate the storage area.
- Signs, stickers, or labels are to be fitted in such a manner that they do not obstruct the driver's vision or impede the driver's use of any controls.

Employees driving vehicles are required to follow safe driving practices:

- Obey all federal and local driving laws or regulations as well as requirements of clients.
- Immediately report any citation, warning, traffic violation, collision, vehicle damage or near miss associated with STRATEGIC TRANSPORT or client vehicle operation or while driving on STRATEGIC TRANSPORT duties to the supervisor.
- Immediately report any restriction or change to their driving privileges to the supervisor.
- Seat belts shall always be worn by all occupants whenever the vehicle is in motion; only seats fitted with three-point inertia-reel type seatbelts shall be used. All vehicles capable of more than 10 mph/15 kph shall have seat belts installed.
- Drive defensively by continually assessing conditions and hazards and remain prepared for any challenge that may approach them.
- When speaking with a passenger, always keep your eyes on the road
- Slow down around construction, large vehicles, wildlife, fog, rain, snow, or anything else that adds a hazard to your driving
- Drive for conditions, not just the speed limit.

Drivers are to be prepared before leaving:

- Perform 360 walk around – report new damage.
- Check windshield for cracks that could interfere with vision.
- Make sure dirt or snow is removed from lights on all sides of the vehicle.
- Brush or clean off snow or ice on all windows to ensure complete vision.
- Check fuel level to be certain the destination can be reached.
- Check to ensure the license plates and inspection tag on vehicle are current.

- Ensure that there is a first aid kit in the STRATEGIC TRANSPORT vehicle.
- Ensure the driver is rested and alert for driving.
- Employees are not to perform repairs or maintenance other than routine fluid additions.

Vehicle Requirements

- All vehicles shall be fit for the purpose and shall be maintained in safe working order.
- Tire type and pattern is to be recommended by the vehicle or tire manufacturer for use on the vehicle in operation.
- Vehicles are to be fitted with a spare wheel and changing equipment to safely change a wheel, or a suitable alternative.
- Loads shall be STRATEGIC TRANSPORT and shall not exceed the manufacturer's specifications and legal limits for the vehicle.
- Vehicles are to be equipped with roadside emergency kits. Roadside emergency kits should be kept in all vehicles used for highway travel. These kits shall include equipment to assist in a roadside emergency such as water, booster cables, first aid supplies, warning triangles, flashlights, etc. If there is a potential for snow and ice, shovel, and a tow rope.
- All STRATEGIC TRANSPORT vehicles which will be field based are to be equipped with a multipurpose fire extinguisher with a capacity of at least 0.9 kg/20 lb. The fire extinguisher should be securely mounted on a bracket and located so that it is easily accessible in an emergency without becoming a hazard in case of an incident.
- All drivers of light vehicles shall carry a high visibility jacket for use in case of emergency stops.

4.0 INSPECTIONS

Through regular inspections, worksite conditions, and work procedures can be monitored to ensure that safety standards and regulatory requirements are being followed. Inspections help to identify hazards before they become problems by revealing where improvements to equipment, work procedures, worker training, and worksite conditions are needed.

1.7 Inspection Program

An inspection program is designed to provide employees with a systematic check of their work areas and equipment, thereby ensuring safe working equipment.

STRATEGIC TRANSPORT will have an inspection program in place for all its operations to meet both internal requirements and the external requirements of our stakeholders including clients and regulators. The basis of our inspection program will include:

- Training for staff to complete worksite inspections.
- A standard guide or template for completing inspections.
- A means of reporting and recording results.
- A system that ensures the review and completion of remedial work.

1.8 Types of Inspections

STRATEGIC TRANSPORT will develop the following types of inspections:

- Facility/ Worksite.
- Equipment Inspection for Preventative Maintenance purposes.
- Vehicles.
- Management Site Observation.
- Pre Job and ongoing Equipment Inspection.

Type of Inspection	Frequency	Responsibility
Vehicles – Daily per use undocumented 360 walk around	Pre-Use	Operator
Vehicles Manufactures recommended	As per Manufactures recommended practices	Operator
Office/Facility - Documented	Monthly	Office Designate
Worksite – Client Site - documented on Inspection Form	Weekly	Supervisor
Worksite Pre-Shift / Pre-job – noted on Tailgate Form	Daily	Supervisor
CVIP – Commercial Units	Annual	Maintenance Foreman

Planned worksite inspections are critical to recognizing potential hazards and taking steps to control them. As such, inspections need to be made at intervals that will prevent the development of unsafe working conditions. Unsafe or harmful conditions found must be remedied immediately. It is important that worksite inspections must be documented.

Defects observed in machinery or equipment shall be reported to a supervisor and must be repaired or replaced before being used again. Any deficiencies identified are documented on the inspection form and will include:

- The name of the person responsible for correcting the deficiency.
- The date of the inspection, the target date for maintenance completion.
- Identification of the equipment, facility, worksite, or office that was inspected, tested or maintained.
- Safety observations of the inspector.
- The risk levels.

All outstanding action items will be tracked to ensure follow-up and corrective actions are taken and closed out. The report will be filed, and the records will be readily available for a minimum of one year.

When inspecting worksites and equipment, workers are reminded to look beyond the physical conditions. Factors to be included in worksite inspections include:

- Worksite hazards.
- Work Practices: When reviewing this category, the focus of the inspection is more on the activities or behavior of the employees. Factors to be considered are:
    - Are the procedures being used appropriate for the task?
    - Is the employee aware of the hazards of the task?
- Housekeeping: This category deals with the physical condition of the workplace. A workplace where debris has been allowed to collect or where tools are left dirty and lying around will have a negative effect.
- Safety Compliance: This category deals with the level of compliance, at the worksite, with relevant legislation and STRATEGIC TRANSPORT requirements. Factors to consider include:
    - Is there a current copy of the OH&S or OSHA regulations available?
    - Does equipment meet STRATEGIC TRANSPORT Standards and Specifications?
- Communication: This category entails talking to employees and contractors about the effectiveness of the communication on the worksite, this includes procedures, emergency response, hazards, and controls, right to refuse unsafe work, and the management of safety work permits.

Inspections require the full participation of all employees, supervisors, and management, who must take responsibility for identifying and attempting to control the hazards within their work areas.

1.9 Preventative Maintenance

The purpose of a preventive maintenance program is to avoid or mitigate the consequences of failure of equipment. This may be by preventing failure before it occurs. Preventive maintenance activities include partial or complete overhauls at specified periods, oil changes, lubrication, and so on. In addition, workers can record equipment deterioration, so they know how to replace, or repair worn parts before they cause system failure. The ideal preventive maintenance program would prevent all equipment failures before it occurs.

Planned preventive maintenance is regular repetitive work conducted to keep equipment in good working order and to optimize its efficiency and accuracy. This activity involves regular routine cleaning, lubricating, and adjusting, checking for wear and tear, and eventually replacing components to avoid breakdown. Maintenance and inspection, as well as training programs, should be used to educate workers about where safety may be of concern.

5.0 TRAINING

1.10 Health and Safety Orientation

Employers are obligated by both OH&S and OSHA legislation to provide employees with the training necessary to perform their assigned tasks safely and competently.

The primary function of an orientation is to clarify STRATEGIC TRANSPORT expectations for employees, contractors and visitors when working at or attending work locations. The orientation ensures that the person receiving the orientation understands their responsibilities.

Level 1 Orientation
A Level 1 Orientation is required for all employees. New employees will receive a general Health & Safety Orientation within the first month of their hire as part of the on-boarding orientation program. This will include the following:

- Introduction to STRATEGIC TRANSPORT.
- Safety Goals.
- Workers' rights and obligations.
- Health and safety roles & responsibilities.
- Safety rules.
- Emergency response plans.
- Incident Reporting and response to incidents.
- PPE (Personal Protective Equipment);
- Contractor requirements.
- Training.
- Safety Meetings.
- Safe Driving.
- Policy Acknowledgement, including HSE Policy, Alcohol & Drug Policy & Discipline procedures.

Level 2 Orientation
A Level 2 Orientation is required for all staff that may travel into the field. This orientation is focused on providing personnel that travel to the field with adequate information on field operations and the inherent hazards associated with transportation services. This will allow them to conduct their business in a safe manner that is compliant with STRATEGIC TRANSPORT'S requirements for visiting work sites.

The following topics covered in this training session include:

- Level 1 components, plus:

- Potential hazards such as: winter and off-road driving.
- Corporate personnel responsibilities.
- Company Rules (Field)
- Hazard assessment and control.
- Risk evaluation and control.
- Inspection Programs.
- WHMIS/ GHS Requirements.
- Safe Work Procedures and Practices, including but not limited to:
    - H2S
    - Respiratory Protection
    - Rigging and Hoisting
    - Emergency Response
    - Fall Protection
    - Fire Hazards
    - LOTO Requirements
    - Overhead Power lines
    - Safeguards
    - Site Emergency Response plans
    - Etc.

The orientation must be scheduled with the company H&S representative and/or manager in advance of field visits with adequate notification for scheduling.

1.11 Site-Specific Orientations

Supervisors, employees, contractors, and visitors who move between worksites will be given site specific orientations. This orientation, at a minimum, will include the requirements for hazard reporting, and the emergency response procedures for that site. All supervisors, employees, contractors, and visitors are required to review the site hazard assessment and/or tailgate meeting form and sign it to confirm they understand the hazards, controls, and risk on site.

Contractor Orientation
Contractors that will be conducting work on STRATEGIC TRANSPORT work sites must be made aware of personal protective equipment (PPE) requirements, site-specific hazards and controls, and review emergency preparedness if an emergency occurs. Additional information on field operations and the inherent hazards associated with live process areas is also required. This will allow them to conduct their business in a safe manner that is compliant with STRATEGIC TRANSPORT'S requirements for working on client field sites.

Visitor Orientation
Visitors to STRATEGIC TRANSPORT work locations must be under the constant supervision of a STRATEGIC TRANSPORT representative. All visitors to STRATEGIC TRANSPORT worksites will be required to complete the visitor orientation presented by a STRATEGIC TRANSPORT representative. STRATEGIC TRANSPORT representatives must make visitors aware of the scope of work they will observe, personal protective equipment (PPE) requirements, site-specific hazards and controls, location of first aid kits and review emergency response plan.

1.12 Job-Specific Training

Attracting, hiring, and retaining the best-qualified personnel, to meet short- and long-range staffing needs, is a total management responsibility. Functional responsibility for employment rests with the hiring managers. Job-specific and refresher training ensures that each employee can perform their assigned tasks and work in a safe and efficient manner. This training should be conducted at the time of hire, before an employee starts work, and, at a minimum, every three years or sooner if required.

A competency program will be developed defining the required qualifications for employees for each position. Job specific training will be outlined in the employee handbooks.

6.0 INCIDENT REPORTING AND INVESTIGATION

1.13 Incident Reporting

All incidents are to be reported as soon as possible to STRATEGIC TRANSPORT management. The incident report is to be completed by the end of that shift but in serious incidents immediate completion and submittal of the incident report is required. Incident reports should be completed by those individuals(s) who have been directly involved in the incident.

The Incident Report is a standard form used by all employees to report incidents and spills to their supervisors. Employees must complete the form fully, providing as much detail as possible. Table 1 outlines the information required when completing the Incident Report, and the person responsible for filling out the different sections of the form.

Written incident reports should be prepared and include an incident report form and a detailed narrative statement concerning the events. The format of the narrative report may include an introduction, methodology, summary of the incident, investigation member names, narrative of the event, findings, and recommendations. Photographs, witness statements, drawings, etc. should be included.

Personnel will be trained in their roles and responsibilities for incident response and incident investigation techniques. Training requirements relative to incident investigation and reporting (Awareness, First Responder, Investigation, and training frequency) should be identified in the program.

Table 1: Information Required in the Incident Report

Incident Report	Purpose	Completed By
Preliminary Incident Details	Records vital information pertaining to the incident investigation.	Driver
Type of Incident	Classifies the incident for statistical tracking.	Driver
Description of Incident	Records information common to any type of incident. Documents how the incident occurred (who, what, when, where, why, and how). Includes all relevant information immediately before, during, and after the incident.	Driver
Incident Analysis	Documents causal analysis (Use the analysis options on the reverse side of the incident report form.).	Manager or designated HSE Personnel
Corrective Action	Identifies actions that should be taken to eliminate or minimize the likelihood of the event occurring in the future.	Manager or designated HSE Personnel

1.14 Notification of Incident

In certain situations, an injury/illness must be reported to the local regulatory authority, whether it be OH&S, OSHA, or local workers compensation boards. Drivers will ensure they understand the types of events and timelines applicable to reporting serious injuries, illnesses, and safety incidents. Company procedures for ensuring those governmental authorities are reported to on a timely basis will be completed.

Table 2: Reporting Agencies and Timeframes for Various Types of Incidents

Type of Incident	Reporting Agencies and Reporting Timeframes			
	Alberta	**British Columbia**	**Saskatchewan**	**Manitoba**
Workplace Injury (Medical Treatment)	WCB 72 hours Employers Report **780-427-5863 (f)**	Worksafe BC 72 Hours Employers Report **888-922-8807 (f)**	WCB (5 days) Form E1 Employers Initial Report **306-787-7773 (f)**	WCB (5 days) Employers Incident Report **877-872-3804 (f)**
Serious Workplace Injury	Immediate notification of a Serious Workplace Incident: Death, admission to hospital for more than two days, unplanned explosion fire or flood **1-866-415-8690**	Worksafe BC (Fatalities and serious injuries) Immediate reporting to Prevention Emergency Line **1 888 621-7233**	Serious Injury, Fatality, Dangerous Occurrences (hazardous occurrence report) **1-306-787-4496**	Immediate notification of a Serious workplace incident **1-866-888-8186**
Vehicle Collision	RCMP Fish and Wildlife (animal) Insurance Coordinator	RCMP Fish and Wildlife (animal) Insurance Coordinator	RCMP Forest Service Insurance Coordinator	RCMP Forest Service Insurance Coordinator
Transportation of Dangerous Goods (TDG) Occurrence	RCMP TDG (occurrence report)	RCMP TDG (occurrence report)	RCMP TDG (occurrence report)	Notify as soon as possible following jurisdictional requirements
Spill	AB Environment **1-800-222-6514**	B.C. Emergency Coordination Centre **1-800-663-3456**	Saskatchewan Ministry of Environment **1-800-667-7525**	Manitoba Conversation **1-204-944-4888**

1.15 Protection of Evidence

In the event of an incident occurring which is reportable to an external regulatory no worker shall disturb the scene of the incident. The first person on site is responsible to secure the site so as not to disturb the scene. The only exceptions to this are to:

- assist a person who has been injured.
- to take action to prevent further injuries.
- to protect property that is endangered because of the incident.
- unless you have been given permission to do so by the responding regulatory officer.

Initial identification of evidence immediately following the incident might include the time of the event, a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors such as fatigue, age, and medical conditions.

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.

1.16 Incident Investigations

The purpose of investigations is to determine immediately the root cause(s), so that corrective measures can be put in place to prevent similar incidents. All incident investigation reports shall be in writing and submitted to the safety department as soon as possible.

Investigation Risk Ranking

STRATEGIC TRANSPORT will fully investigate all incidents and serious near misses (risk ranking of 9 or higher). The depth of the investigation and who will lead and participate in the investigation will be determined on a case-by-case basis depending on the severity or potential severity of the event.

Investigations will be conducted promptly to ensure incident details are fresh in the minds of individuals involved and that physical evidence remains intact.

Participation and cooperation from involved workers, witnesses, supervisors, and management is essential to identify root causes and preventative measures.

Strategic Transport Ltd.

Employee

Incident Occurs

Provide First Aid
Limit Damage
Call Emergency Services as required

Immediately Notify Manager/ Supervisor and await direction and provide assistance when required

IMPORTANT

For minor incidents that may not require immediate response from supervisors, employees are required to gather relevant information at the site for investigation.

An example: a minor vehicle incident that would be dealt with immediately to ensure no delay of being on the road causing traffic upset or risking personal safety – obtain registration, insurance, driver's license number and contact information – then follow up with supervisor and provide documentation to HSE.

Manager/Supervisor

Respond to incident and take control

Determine Type of Incident

Notify Appropriate Parties:
Strategic Transport Representatives
HSE Representatives
External Notifications
Note: Ref. Section 7, Table 2 of HSE Manual for External Notifications (i.e. WCB, RCMP, Environment, Worksafe BC, etc.)

Perform Site Activities or provide direction to worker to:
Secure the Scene
Protect Evidence
Keep Defective Equipment related to incident
Take Photos/ diagrams
Get Witness Statements
Get Contact Information
Get insurance/ registration/ Driver License documents (if vehicle incident)

Report Incident on Incident Report Form within 24 hours and submit to HSE department

Investigation Team

Start investigation within 48 hours.
Select members of Incident team & investigation technique

Analyze Evidence
Gather Field Documentation (photos, statements, diagrams, photos, documentation, initial incident report, etc.)
Conduct interviews (gather information from activities before the incident occured, during incident and after the incident)

Analyze evidence and determine root cause

Determine appropraite corrective action

Communicate results of investigation within 14 days

Track assigned corrective actions to ensure completion

Have management review and sign off on investigation report

Systematic Cause Analysis (SCAT) will be used to determine the immediate and root causes. Recommendations will be made to correct any unsafe acts and/or conditions along with the underlying personal or job factors. Investigation of an incident minimizes the possibility of recurrence by determining and eliminating the root cause(s).

STRATEGIC TRANSPORT shall fully investigate the following types of incidents:

- All recordable injuries, including first aid treatment, medical aid, lost time, modified work
- Occupational illnesses or disease
- Vehicle accidents
- Property and equipment damage
- All refusals of unsafe work
- Environmental incidents / spills
- Near misses with a severity potential of 9 or greater

Incident Investigation Standards

STRATEGIC TRANSPORT has implemented requirements for investigating incidents which include:

- The intent/purpose of investigating incidents,
- A definition of roles and responsibilities in the investigation process,
- The requirement to include an employee competent in the task related to the incident,
- The requirement to initiate investigations immediately,
- An outline of the types of incidents that need to be investigated,
- A requirement to investigate all work refusals, and
- Senior management review and sign-off.

1.17 Conducting an Investigation

To conduct an effective incident investigation, it is important to understand the benefits of incident investigation. The investigation team will be provided with all the necessary and proper equipment necessary to investigate. This may include but not be limited to writing equipment, measurement equipment, cameras, audio recorder, marking devices, equipment manuals etc.

Effective investigations achieve the following goals:

- Determine and describe what happened.
- Evaluation of loss potential.
- Determine the type of event.
- Determine the immediate and root cause(s) of the incident.
- Prevent future incidents that could cause injury, illness, property damage, or other harm.
- Develop controls to reduce risk in the workplace.
- Ensure the organization meets its legal requirements for investigating incidents.
- Demonstrate concern for employees' health and well-being.
- Create and maintain awareness of relevant Occupational Health and Safety legislation.

After an incident occurs, there are several steps that need to be completed. The following identifies the steps involved in completing the investigation.

Step 1: Assemble Investigation Team

The incident investigation team members may include the following individuals:

- Supervisor/Manager.
- Affected worker(s).

- Associated contractor(s).
- Internal and external resources applicable to the incident (as needed).
- Trained investigator.

Investigations should be done by the supervisor in charge of the area and involve other people on site including the workers involved in the incident. Management and H&S representatives may assist and must review every incident report to ensure that appropriate corrective action is taken.

Step 2: Gather Relevant Information
The investigator or investigating team will gather and document all relevant information about an incident with the goal of identifying its cause(s).
Steps to gather relevant information may include:

1. Take control of the scene.
2. Ensure that no further injury or damage occurs.
3. Report incident to immediate Supervisor; HSE; Management.
4. Examine equipment/materials involved.
5. Collect and safeguard any physical evidence.
6. Take photographs or make sketches of the scene (pictures should be both up close and from a distance to gain a perspective of the event).
7. Interview people involved and obtain written statements.
8. Gather relevant hazard assessment documentation: JSA's, FLRA's etc.
9. Analyze all the available information to determine causes (position, people, places, paper)

Where practical, the scene of an accident should be left untouched, except to take control of the incident and prevent immediate threat to the safety of people, damage to environment or serious loss of equipment or materials preserve life or relieve human suffering. In the event of a serious/reportable event, the incident scene is not to be disturbed.

Step 3: Determine Incident Cause(s)
Almost every incident is the result of a combination of causes. The primary purpose of investigations is to identify these causes so that corrective action can be determined to prevent a recurrence of the incident.

Often, the immediate causes of an incident will be readily apparent. The task of the investigators is to determine the root cause(s) as well. Asking, "why immediate causes developed" may suggest answers regarding the root cause(s). Remember to also include the other four W's (who, what, where and when). All immediate and root causes should be documented in the Incident Investigation Report.

- Reference the SCAT chart – personal and job factors. Determine the root causes so that corrective actions can be determined.
- Assign a responsible person to ensure the corrective action is completed.
- Complete and document reports
- Communicate findings and learning to the organization
- Follow up to verify the corrective action was implemented and validate that it was the proper corrective action.

Additionally, the information collected will be valuable in meeting regulatory reporting requirements.

Step 4: Identify Corrective Action and Make Recommendations
After identifying the immediate and root cause(s) of an incident, investigator(s) must recommend corrective actions to be put in place to prevent similar incidents. The Supervisors/Managers responsible for the workplace, in combination with other Management personnel must assign and implement corrective actions. Corrective actions

must be documented in the Incident Investigation Report. Completion of all questions on the Incident Investigation Report will guide the investigators in collecting appropriate information, allow for analysis of the information to be completed to identify the causes of the incident, and provide recommendations for hazard controls so that similar incidents will not reoccur.

Step 5: Communication to Workers
Incident investigation scenarios and corrective actions must be communicated to workers (including contractors and visitors as applicable) without compromising the privacy of the individual(s) involved in the incident.
Lessons learned should be reviewed and communicated. Changes to processes must be placed into effect to prevent reoccurrence or similar events.

Step 6: Review and Follow-Up
The report must be reviewed and closed by management and distributed based on the risk ranking of the incident. High risk incidents will be summarized by Corporate Safety and presented to the Executive and HSE committee. Follow-up to monitor the effectiveness of implemented corrective actions is required and must be documented. Management will review the recommendations to ensure appropriate/adequate corrective actions were implemented.

1.18 Health and Safety Statistics

Safety statistics are maintained by the HSE Manager designate and are used to monitor the effectiveness of the HSMS. Statistics give management a point of reference as to the health and safety of STRATEGIC TRANSPORT, and to guide STRATEGIC TRANSPORT's efforts toward reducing incident frequency rates. Accurate safety statistics depend upon all personnel making complete reports of injuries, incidents and near misses.

An example of statistical data that could be included in the report based on the breakdown of incidents is listed below:

- Lost Time Injury (LTI) – An injury resulting in missed workdays due to occupational injury or illness, excluding the day of the injury and the day the employee returned to work.
- Lost Time Injury Rate (LTIR) – The average number of Lost Time Injuries each year. This statistic is calculated as follows:

$$\frac{\text{NUMBER OF VEHICLE INCIDENTS X 1,000,000}}{\text{TOTAL NUMBER OF KILOMETERS DRIVEN}}$$

- First Aid Injury (FA) – An injury that requires only one-time first aid treatment and allows the worker to return to work immediately.
- Medical Aid injury (MA) – An injury requiring professional medical treatment beyond one-time treatment; includes loss of consciousness.
- Fatality (F) – An incident involving a fatality due to circumstances on the work site or due to a vehicle incident while in the process of performing company duties.
- Modified Work (MW) or Restricted Work (RW) – An injury that results in the employee performing duties other than their regular duties or performing their regular duties less than full time until recuperated.
- Total Recordable Incident Rate (TRIR) – This is used to determine our injury frequency rate. Recordable Incidents include Medical Aid, Lost Time, Fatality and Modified Work incidents. The rate is calculated as follows:

$$\frac{\text{NUMBER OF RECORDABLE INJURIES X 200,000}}{\text{NUMBER OF EMPLOYEE EXPOSURE HOURS}}$$

- Motor Vehicle Incident (MVI) –– All motor vehicle collisions are reportable, but a recordable MVA is a motor vehicle incident involving a licensed motor vehicle while on personal or business use which results in an accident-causing injury, death or property damage. The following will not be considered a recordable motor vehicle incident:
    - **Properly Parked** - The vehicle was properly parked at the time of the incident
    - **Animal Strikes** - The vehicle is damaged due to striking or being struck by an animal, where it was deemed by the HSE Manager as non-preventable.
    - **Standing in Traffic** - At the time of the vehicle incident, the vehicle is stopped in a traffic lane in response to an officer, signal, stop sign, or to traffic conditions.
    - **Road Debris, Rocks, Gravel, Tar** - Damage caused solely by striking road debris (e.g. potholes, a nail, truck tire tread) as well as rocks or gravel thrown by vehicles, or by getting road tar on the vehicle.
    - **Third Party Citations** - Vehicle incidents in which the 3rd party receives a citation, and the company vehicle operator does not.

- Motor Vehicle Incident Rate (MVIR) – This statistic determines the average number of kilometers driven by employees before a vehicle incident occurs. This is calculated using the number of kilometers driven. The formula to determine the Vehicle Incident Rate is:

$$\frac{\text{NUMBER OF VEHICLE INCIDENTS X 1,000,000}}{\text{TOTAL NUMBER OF KILOMETERS DRIVEN}}$$

The HSE Manager or designate will prepare an Incident Summary report quarterly for management's review. It will also be shared internally with employees informed of any incidents involving co-workers.

7.0 COMMUNICATION

1.19 Health and Safety Communication

Consistent communication concerning health and safety is essential to ensuring that all employees understand their assigned roles and responsibilities. It also provides an opportunity to share information about activities undertaken, changes to policies and procedures, non-conformances and lessons learned.

Ideally, communication will be two-way communication where there is opportunity to share information and to gather feedback about the information shared. Two-way communication also provides an opportunity for employees to share information or concerns they might have or ask questions.

Formats for communication of health and safety information might include:

- Scheduled Safety Meetings.
- Managers Meetings.
- Post Incident Shared Learnings.
- Customer Compliments and Complaints.
- Progressive Discipline.
- Employee Reviews.
- HSE Meetings.
- Email messages.
- Safety Alerts/Safety Bulletins.
- Safety Moments.

The method chosen for communication may vary depending on the nature of the information to be communicated and the geographic location of the person delivering the message and the message recipient.

1.20 Post Incident Shared Learnings

When incidents occur, they are investigated and analyzed for root causes. Action plans are developed, and then implemented, to reduce the probability of the incident recurring. Incident learnings and action plans for all high potential incidents are shared across STRATEGIC TRANSPORT at monthly safety meetings, safety bulletin/safety alert process described below.

1.21 Follow Up from Communication

Minutes will be kept for all meetings and actions items will be identified. Actions items will outline:

- The issue.
- The recommended/agreed upon action.
- The individual assigned to take the action.
- The required due date for completion.
- The actual date of completion.
- Sign off verification of completion.
- Any future follow-up actions required.

All action items will be tracked, using the format or system designated. Should the action item not be completed within the required period, the supervisor or manager of the responsible individual shall become responsible to follow-up and ensure the required actions are completed.

All action items will be reviewed at a following meeting and will include an update on the progress of the action and any reasons for delays or changes. Items shall continue to be reviewed at meetings until they are completely resolved, or it has been agreed that the issue will be tabled.

1.22 Safety Records Retention / Destruction

Document Retention Standard

This is a guide to retaining health and safety related records, in particular the retention location and length of retention time. All records will be archived and controlled in a STRATEGIC TRANSPORT and protected environment (safe from fire, water, rodent damage and/or deterioration). STRATEGIC TRANSPORT will keep records of fatalities, injuries and illnesses that are work related, are new cases or meets one or more of the general recording criteria under OSHA or Canadian Health and Safety Performance Metrics Reporting requirements.

The following steps shall be followed when moving a document into a record status and maintaining it on site for reference, STRATEGIC TRANSPORT due diligence and future needs:

- All documentation shall be reviewed annually for currency and archiving.
- All documents deemed to be records shall be entered into the site record retention table, with the following details:
    - Document description
    - Date of file
    - Period of retention
    - Record location.
- Records shall be placed in a box, labelled OBSOLETE RETAIN, and stored in a STRATEGIC TRANSPORT location.
- Destruction of records:
    - Records shall be reviewed annually (records retention table) at each location for need and established destruction dates.
    - A letter of destruction shall be developed, listing the records set for disposal.
    - Approval for destruction shall be obtained, in accordance with the records retention schedule.

Records Retention Schedule

Health, Safety and Environmental Employee Records

Document Description	Retention	Required Approval for Destruction
Health / Safety / Records		
Safe Work Permits	1 years*	Site Mgmt., HSE
Medical Records	Employment plus 30 Years	HSE
Employee Exposure Records	30 years	HSE
Confined Space and Ground Disturbance Permits	1 years*	Site Mgmt., HSE
Employee Field Inspections	2 years after employee severance	Site Mgmt., HSE
Safety Meetings Minutes	3 years	All Levels
ERP Drills	3 years	Site Mgmt., HSE
Incident reports/investigations	3 years	All Levels
Fatality Documentation	Lifetime	N/A
Facility Inspections	3 years	Site Mgmt., HSE
Incident reports/investigations	3 years	All Levels
Hazard Assessments	3 years	Site Mgmt., HSE
Environmental Site Inspections / Audits	10 years	All Levels
COR Audits	6 years	HSE
Corrective Action Log	3 years	HSE Department
OSHA 300 and 301 Logs for each location	Lifetime	n/a
Maintenance Records		
Unit Files	1 year after a unit is decommissioned	All Levels
Pre/Post Trips	3 years	Site Mgmt.
CVIPs	10 years	All Levels
CVSA Inspections	10 years	All Levels
Employee Records		
Training Records	2 years (after STRATEGIC TRANSPORT severance)	All Levels

A copy of the letter of approval for records destruction shall be retained with management.

Employee medical record means a record concerning the health status of an employee, which is made or maintained by a physician, nurse, or other health care personnel, or technician.

Medical Monitoring shall include either environmental and/or biological monitoring. Environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling, as well as related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained.

Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.) but not including results which assess the biological effect of a substance or agent, or which assess an employee's use of alcohol or drugs.

1.23 Health and Safety Management System Evaluation

Measurement of performance is important in determining the success of HSE management efforts. STRATEGIC TRANSPORT will periodically assess regulatory compliance and the implementation of and compliance with the HSE expectations to ensure that risks are being appropriately addressed and that management processes are in place and working effectively. This involves both internal self-assessments and appropriate external assessments. This information is used for continuous improvement.

Purpose

- HSE performance standards and indicators are established, communicated, and followed by individuals at all levels of the organization.
- Performance is measured against objectives, targets and milestones established annually. HSE strategies are updated based on measured results and identified improvement opportunities.
- A documented audit program exists to independently evaluate progress towards HSE targets, regulatory compliance, and the effectiveness of the HSE management system.
- External audits are carried out within each business unit a minimum of once every three years, and the results reported to management.
- Self-audits of the HSSE management system are conducted on an annual basis, and the results reported to management.
- Processes are in place for documenting and tracking results from assessments and audits, including follow-up actions to close out all findings. Audit results are reviewed by the business unit team.
- Findings from learning processes (e.g., audits, incident investigations, near misses, etc.) are prioritized, tracked, and used to systematically improve the HSE management system.
- Sharing of best practices is enhanced through communication of findings and wide participation in audits and system reviews.