



Occupational Health & Safety Program

"A JOB IS WELL DONE, WHEN IT HAS BEEN SAFELY DONE."

Updated: January 10, 2016.

Statement of Safety Principals

Advantage Bike Racks & Lockers Inc. (ABR) recognizes the right of everyone to a safe and healthy work environment. We are committed to a strong Health and Safety Program that protects workers, contractors, customers, clients, the public and property on our projects.

ABR believes that all safety incidents are preventable. Our goal is that everyone goes home safe, every day. Active participation at all levels will ensure that this goal will be achieved.

ABR endeavours to provide proper and relevant employee training, job specific safe work practices, and safety guideline that focus management, employees, contractors, and worker's awareness on reducing the risk of incidents in all activities.

ABR, our contractors, and all workers are collectively responsible to ensure compliance with local government by laws, the Workers Compensation Act, and the Occupational Health and Safety Regulation in regards to working on our projects. Everyone is responsible for cooperating and participating in the implementation of this Health and Safety Program including workplace inspections, incident investigations, and our continuous improvement of this program.

ABR is committed to safe and sustainable practices in all aspects of our operations and therefore will review and update this program on an annual basis to adapt to industry changes, and regulation updates.

Definitions and Responsibilities

In the event this document or its associated material conflicts with applicable legislation, the legislation takes precedence.

Regulation

The use of the word 'Regulation', with a capitalized letter R, means the current Occupational Health & Safety Regulation of the Workers Compensation Act of British Columbia and any related Policies, Guidelines, and Standards

Safety Manager

The Safety Manager is responsible for assisting with the development, implementation and monitoring of the ABR Health and Safety Program and notifying the General Manager of all incidents, and the President of any reportable incidents.

They are to recommend policy and procedure, establish responsibilities, develop controls to ensure performance, and conduct project inspections to ensure compliance with safety policies, the Regulation and other applicable laws and legislation. In addition, the Safety Manager will;

- Ensure, in coordination with the General Manager, that all safety policies, safety plans, and relative information have been provided to the General Contractor.
- Ensure that all safety administration supplies, equipment and other necessary and relevant safety material required for each project is provided and delivered to site.
- Conduct safety inspections and audits.
- Assist personnel in evaluating and maintaining ongoing safety initiatives.

Should the Safety Manager identify any concern that is not immediately rectifiable, they carry the authority to suspend work until the issue is resolved.

First Aid Attendant

The First Aid Attendant must;

- Administer First Aid in accordance with the Regulations and training.
- Ensure the First Aid log book is completed accurately and kept confidential.
- Keep current MSDS and WHMIS information on file.
- Coordinate the transportation of injured workers to a physician's office or hospital.

General Safety Rules

1. All workers are to follow the instructions of the Safety Manager.
2. Equipment operators are responsible for the safe maintenance, operation, and required documentation of the machines and equipment they are operating. This includes strict adherence to the established work practices and safety procedures for that equipment.
3. Workers must use Personal Protective Equipment when required or when instructed to do so. All ABR staff are required to wear a vest, hardhat and CSA approved footwear while on any project under construction.
4. Horseplay of any type is not permitted.
5. Hardhats and protective footwear must be worn at all time.
6. Maintain a clean site. Clear and unobstructed access must be provided to all work areas.
7. Safety Meetings will be held with all workers every month, or more frequently as circumstances dictate.
8. All injuries, no matter how minor are to be reported immediately to the First Aid Attendant and project Supervisor.
9. Shirts and pants must be worn. Pants must be of sufficient length to meet the top of the footwear when the worker is standing. Shirts must have a shoulder seam and sleeve of sufficient length to cover the shoulder. Shorts and sleeveless shirts are not allowed.
10. Workers are to protect themselves from fall hazards by implementing appropriate protection measures.
11. If an impalement hazard is created, then there must be effective guarding against the hazard.

Safety Rules: Worker Responsibilities

Every worker is responsible for safeguarding his / her own health and safety as well as educating and instructing visitors or guests they direct or accompany to a project site on the safety requirements of the site.

All workers must:

- Refuse unsafe work.
- Ensure other workers, visitor, or guests they direct or accompany to a project site, are instructed and educated on the necessary safety requires prior to arriving on site.
- Follow safe work practices / procedures and take an active part in protecting themselves and their fellow workers.
- Report hazardous conditions, practices and behaviour in their work areas to their supervisors.
- Report any and all injuries to their supervisor and the First Aid Attendant.

- Visitor Responsibilities.
- Each visitor is responsible for safeguarding his / her own health and safety.

Safety Rules: Visitor Responsibilities

All visitors must;

- Report to the site office and complete their orientation.
- Wear approved personal protective equipment (approved boots, hardhat, and high visibility vest).
- Report and unsafe acts or conditions.
- Report any injuries immediately to the First Aid Attendant.

Disciplinary Action Policy

All safety rules and procedures contained in this Health & Safety Program shall be practiced and enforced by all ABR employees and sub-contractors.

When disciplinary action is required due to a violation of the Safety Program as set out below, the Safety Manager will notify the General Manager without delay to conduct an assessment and render a decision for remediation and / or corrective action.

Smoking

In accordance with the Regulation, it is the policy of ABR to prevent illness or other hazards from smoking in the workplace. ABR endeavours to prevent exposure to workers from second-hand smoke. Smoking is only permitted outdoors.

Smoking is not permitted in the following location on any ABR project site:

- During refuelling or around fuel storage areas.
- Within or around the structure being worked on including parkades, balconies, and roofs.
- Areas where construction debris is being disposed of.
- Any location designated as a non-smoking area.

Workers found in non-compliance of this policy will be subject to disciplinary action.

Alcohol and Drugs on Site

The possession or consumption of alcohol or other non-prescription drugs on the job site, or working while under the influence of these substances is not permitted under any circumstance.

Workers found to be in violation of this policy will be removed from the site immediately and substantially disciplined.

Any worker taking prescribed medications must report this to their Supervisor as well as the Safety Manager.

Radios and Personal Music Players

At no time may a radio or personal music player be operated on a project site. Communication radios are permitted.

Communication

Workers must be able to effectively communicate with supervisory and safety personnel verbally or in writing. If they are not able to for any reason, a worker possessing these skills must be assigned to work with such workers.

Workplace Violence

Violence, which includes, threats, intimidation or discrimination of any kind, on any basis, will not be tolerated. Failure to comply with this section will result in dismissal.

Hot Work

Any work producing a spark or flame on or immediately adjacent to combustible material must have a Hot Worker Permit issued prior to commencing the work. All aspects of the permit must be followed.

Personal Protective Equipment (PPE)

ABR requires the use of personal protective equipment (hard hat, high visibility vest, CSA approved footwear, safety glasses) at all times, on all sites.

PPE will be selected for each task based on the requirements of the Regulation, the manufacturer recommendations, and any applicable Safe Work Practice, Procedure, or JHA.

Footwear meeting the requirements of the Regulation and providing protection appropriate to the overall conditions of the site must be work and maintained in good condition.

Protective Headgear (hard hat) meeting the requirements of the Regulation must be worn in accordance with the Regulation where required by site conditions or rules.

Hearing Protection: CSA / ANSI approved hearing protection must be worn when the noise level in a work area exceed the permissible occupational exposure limit; typically noise greater than 85 decibels.

Respiratory Protection: All workers who are exposed to potential hazards associated with airborne contaminants are expected to wear respiratory protection. When doing so, they must be clean shaven where the respirator contacts the face to ensure a proper seal is maintained.

All PPE shall be maintained in good working orders and used in accordance with the manufacturers recommendations. PPE shall be regularly inspected and replaced without delay when deficiencies are identified.

Personal Clothing

Workers shall be properly attired on all ABR sites. The minimum requirement for personal clothing is a shirt that completely covers the shoulders and reaches the waistline, and pants that meet the top of the footwear when standing. Furthermore, clothing shall be appropriate for the work being performed.

Environment | Exposure | Hygiene

Workplace Hazardous Material Information System (WHMIS)

Workplace information includes knowledge of the hazards of the workplace and of the materials used in the workplace. The Workplace Hazardous Materials Information System (WHMIS) is a major response to the worker's right-to-know about safety and health hazards of material used in the workplace.

WHMIS legislation provides employees, employers and suppliers nationwide with specific vital information about hazardous material through the key elements of:

- Controlled product labelling
- Material Safety Data Sheets (MSDS)

- Worker education and training programs

On the basis of WHNIS and other workplace information, ABR has developed work procedures that ensure worker health and safety. Workers must be educated in hazards and trained in work procedures.

Chemical Inventory

A current inventory of hazardous material, which identifies all hazardous substances and their quantities at the workplace, must be maintained.

A chemical inventory includes the chemical name (formula) of the material and the size of its container. Regular inventories allow for the following;

- To identify the chemicals present
- To correct incompatible storage
- To remove surplus hazardous chemicals
- To check ethers and other chemical with limited shelf life
- To remove chemicals that have not been used in the past 1 — 3 years

WHMIS Program

ABR implements the WHMIS program using information provided through WHMIS as well as other information from the workplace.

WHMIS information is in the form of labelling and MSDA. Other workplace information includes knowledge of the hazards of the workplace, use of hazardous materials that depend upon factors such as quantities used, work processes and work location.

ABR ensures its employees have received WHMIS training. All supervisors are to monitor products and material arriving for WHMIS labels. Products and materials displaying WHMIS labels indicate they are 'Controlled Products' and must be accompanied by an MSDS. These products and materials are not to be used on site until the MSDS is available on site.

Prior to use of Controlled Products, the Supervisor will review the WHMIS label and MSDS and advise the employees of the safe work procedures to be followed. MSDS information records must not be older than three years from the date they were developed.

Environmental Protection

ABR is dedicated to acting responsibly and demonstrating accountability in the management of the property and its projects with regard to protecting the environment. The purpose of this Environmental Protection Program is to:

- Ensure compliance with all applicable environmental regulations at all site of activity.
- Meet all legislated requirements as a minimum standard.
- Provide communication and education about environmental issues.
- Provide a framework for establishing procedures that will ensure a consistent response to environmental issues.
- Demonstrate responsibility and due diligence.

Worker Responsibilities

The responsibility of every worker, employee, or staff member is to:

- Minimize environmental impact by participating in a Reduce, Reuse, Recycle program.
- Follow established ABR or regulatory procedures and policies for the protection of the environment
- Report to their supervisor all incidents which may harm the environment.

Handling and Disposal

Disposal of hazardous wastes will be conducted in accordance with all applicable regulation, legislation and / or city bylaws that govern the area.

All individuals handling hazardous materials or conducting activities that could impact the environment must be trained. Training records are to be documented and maintained up to date.

Exposure Control Plans

A walk through is conducted to assess the potential for overexposure, taking into account all routes of exposure including inhalation, ingestion and skin contact.

Reassessment is conducted when there is a change in work conditions that may increase the exposure, such as a change in production rate, process or equipment.

Training and Safety Meetings

New Worker Orientation

Orientation of new workers is mandatory and must be completed prior to commencement of work on any site. It is the responsibility of the supervisor to ensure their workers have completed the Site Safety Orientation prior to starting work.

Job Specific Training

Job specific training of workers is conducted in, but is not limited to, the following situations:

- When a new worker is hired.
- When a worker is assigned to new or different work.
- When a worker is moved to a new site or location

This training will be conducted by the worker's immediate supervisor and will contain the following items:

- Review of safe work practices and procedures that apply to the specific job.
- Awareness of all known safety hazards that may affect the worker.
- Determination of a worker's skill level and work methods. This includes both discussion with the worker and observation of how he does the work.
- Review of all equipment the worker will use.
- Review of all safety policies and worker expectations.
- Provide the worker with all that is necessary to do the job safely and correctly.

Depending on the complexity of the job and the worker's skill / experience level, job specific training may take anywhere from a few minutes to several months. Ensure training documentation is kept. The ongoing monitoring and coaching of the worker is a major duty and responsibility of that worker's immediate Supervisor.

Safety Meetings

On the first Monday of every month there will be a mandatory crew meeting to discuss and promote health and safety matters, work place communications, job related concerns and any other relevant business including:

- Consultation with workers and the employer on issues related to occupations health and safety environment.
- Make recommendations for the improvement of the health, safety and occupational environment of workers.
- Advise on proposed changes to the workplace or the work processes that may affect the health and safety of others.
- Ensure that accident investigation and regular inspections are carried out as required by the Workers Compensation Act and the Regulation.

Workplace Hazard Assessments & Control

Work site hazard assessments and safety inspections are key activities in the prevention of accidents. Their purpose is to:

- Identify existing and potential hazards
- Increase awareness leading to the prevention of workplace accidents and illnesses
- Ensure compliance with standards and regulations.

WorkSafeBC requires that hazards to the safety and health of workers are identified and brought to management's attention. It is the workplace management's responsibility to ensure that the identified hazards are eliminated and where this is not practicable to ensure the hazards are controlled and that workers are protected from the hazards.

To meet this requirement, employers must conduct:

- Hazard assessments prior to all new project, jobs or processes, or the introduction of new equipment or
- hazardous material
- Regular workplace inspection.

ABR will provide all necessary resources to ensure that hazard assessments and workplace inspections are effective. These include:

- Hazard recognition and safety inspection training for inspectors.
- Time of inspectors to complete their duties
- Established communication channels between inspectors, local safety agencies and management
- Quick action on recommended correction.

Workplace Inspections

All employees are expected to inspect maintain continual awareness of hazards in their work areas. This is accomplished by supervisors conducting regular walk-throughs of their areas of authority, and by workers checking their work areas prior to commencing work.

Any detected hazards must be corrected immediately if the task is within the employees capabilities. If not, the hazard should be reported the supervisor or management for correction.

Preventive Maintenance

Equipment:

ABR employs only hand tools, and hand-held power tools such a drills, grinders, and an abrasive saw. To ensure that this equipment is both safe and effective, workers and the Safety Manager must monitor these tools to ensure that:

- 1) The tool is grounded.
- 2) Power cords and plugs are undamaged.
- 3) Safety guarding is in place and being used appropriately.
- 4) The tool is visibly and functionally in good working order.

Should any tool be found to be deficient, the worker is to immediately discontinue its' use and give it to their supervisor for repair at the manufacturer's service depot. To ensure that work does not stop and that workers have no motivation to continue using an unsafe power tool, a full set of replacement tools is to be kept on all sites.

Vehicles:

Company vehicles are subject to bi-annual inspection and preventative maintenance by a certified mechanic. Should any issue be identified in between these inspections, the vehicle's driver is to immediately report the deficiency to the Field Manager for corrective action.

Vehicles may not be used if:

- 1) There are active leaks of any fluid.
- 2) Any of the standard safety equipment is inoperable.
- 3) There is significant damage to the tires of exterior of the vehicle.
- 4) Any other issue is identified that would lead to unsafe operation or damage to the job site.

Accident Incident Investigation

The purpose of accident incident reporting and investigating is to prevent a recurrence of the hazardous condition causing the event.

The Workers Compensation Act requires employers to investigate and report any accident which:

- Resulted in injury requiring treatment by a medical practitioner.
- Resulted in death or critical condition.
- Involved a major structural failure or collapse.
- Involved the major release of a toxic or hazardous substance.
- Was a blasting or diving accident.
- Did not result in an injury but had the potential for causing serious injury (near miss).

All accidents / incidents with potential of injury or property loss shall be reported to the supervisor and office immediately.

Emergency Preparedness

WorkSafeBC requires all employers to provide employees with a quick and effective response in the event of injuries or emergencies. First aid and emergency preparedness are an important part of this ABR Health and Safety Program. The purposes of these services are to;

- Ensure prompt and effective emergency responses
- Promote speedy recovery and to minimize the effect of injuries or exposures
- Provide workers with assistance when required.

The success of first aid and emergency preparedness depends on employees knowing what to do in any emergency situations.

Supervisors are required to communicate emergency numbers and procedures to workers during orientation training and to regularly bring up this information during safety meetings. In addition, risks associated with the project's work process and their control measures must also be communicated and understood.

Annual emergency and evacuation drills are practiced to ensure awareness and effectiveness of emergency routes and procedures.

ABR will provide all of the tools and resources required for these programs to be effective. These include;

- Appropriate emergency response plans and equipment
- Training and annual retraining of company emergency responders
- Time made available to allow key players to complete their duties
- Established chain of command for emergency situation.

ABR will establish the emergency response plan for Medical and Fire Emergencies, which will enclose emergency telephone number, emergency air horn and fire extinguishers, hospital routes and first aid location. This place must be updated regularly.

Earthquake Plan

As with a fire, it is impossible to determine the type and extent of the damage the building would receive. The intent of these guidelines is to offer a preconceived plane of action and to act as a tool for the education of workers.

Earthquakes vary in duration, intensity and pattern and can be very destructive.

If you are inside the building:

1. Stay calm, drop, cover and hold on.
2. Do not attempt to exit the building while the shaking is occurring.
3. Get to a position of safety; i.e. away from objects that can fall on you and hurt you, away from edges of the slabs or floor openings.
4. Sit in an inside corner or other structurally sound point and keep out from under any temporary forms or structures. Do not hesitate, move at once.
5. Do not leave your position of safety until the shaking stops. If you have no position of safety, do what you can to protect yourself. Get down a forward position and hold your hands over your head clasped together to protect your neck, and keep your hard hat on.
6. After the shaking has stopped, move to the designated emergency assembly area and report your name and any injuries.
7. If you are hurt and unable to move remain calm to conserve energy and call out for help.
8. Rescue teams will be organized to search for the injured. If on the way to the assembly area you find an injured worker, report the location ASAP.

- Do not move in injured worker as you can complicate injuries.
 - Move the worker only in life-threatening situations.
 - Minimize back and neck movement.
9. Be aware of aftershocks, as you may have to repeat the above.
10. Be aware of the greatest dangers;

- Falling objects
- Swinging doors and broke windows
- Fires
- Electrical hazards

If you are outdoors:

1. If possible, move to an open area.
2. Assume a position of safety and keep low.
3. Keep out of harm's way i.e. away from stored material, trees, mobile equipment, gas or chemical storage, motor vehicles, crew and office trailers or any other objects that can fall on you.
4. After the shaking has stopped, move to the designated emergency assembly area and report your name and any injuries.
5. If you are hurt and unable to move remain calm to conserve energy and call out for help.
6. As mentioned before, do not move and injured worker. Get help.
7. Be prepared for aftershocks.

After the earthquake has ended:

1. Management/supervisor or designate will ensure triage and first aid of injured workers has started
2. A head count be conducted listing the last know location of any missing workers
3. Rescue teams be formed o assist the injured and to search for any missing workers
4. If necessary, hazardous utilities, gas / electricity be located and shut off
5. No worker is to leave site without authorization.

Additional information

In case of a major disaster, emergency shelter locations will be broadcast by Emergency Services Radio. At this time the local authorities will advise the public how to contact family members. If everyone stays calm, follows procedures and the direction of the Emergency Services we will all get back to order sooner.