



HEALTH & SAFETY MANUAL

SAT Consulting and Construction Inc. Safety Manual

Signed by: _____ Version 1.0 Revised: May 01,2013

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SECTION A - MISSION STATEMENT

PHILOSOPHY:

SAT Consulting and Construction Inc. is committed to providing a safe and healthy environment for its employees while establishing and maintaining safe work practices through proper procedures, education and direction. Safety is everyone's responsibility. It rests with all levels of management and each employee.

ALL COMPANY EMPLOYEES:

It shall be the responsibility of every employee to observe and comply with the established SAT Consulting and Construction Inc. policies and procedures, to work in a prudent and safe manner and to promptly report any real or potential safety or health hazard to their supervisor, with the understanding that working safely constitutes a condition of employment at SAT Consulting and Construction Inc.

SENIOR MANAGEMENT:

It shall be the responsibility of Senior Management to establish and maintain standards, policies, procedures, and work practices in compliance with current laws and standards, and to ensure that their Managers and Front Line Supervisors are instructed and trained in the foregoing. They shall dedicate their efforts to providing a safe and healthy working environment for all employees through active leadership and support of Health and Safety programs.

MANAGERS AND FRONT LINE SUPERVISORS:

It shall be the responsibility of Managers and Front Line Supervisors to ensure that employees are instructed and trained in safe work practices in order to secure compliance with SAT Consulting and Construction Inc. policies and procedures. They shall conduct regular safety inspections, conduct regular staff safety meetings, lead accident investigations, and initiate any corrective action for any real or potential safety or health hazard.

ENVIRONMENTAL STATEMENT

SAT Consulting and Construction Inc. recognizes the fragile nature of the environment in which we live and work. Our policy is not to contaminate the air, water, or soil with substances which are known to be or are suspected of being harmful to nature.

Each employee is expected to know and understand the requirements of this policy, and to apply that knowledge to all operations. It is the responsibility of Senior Management, and Front Line Supervision on any SAT Consulting and Construction Inc. worksite, to provide information and instruction to ensure that each employee has the knowledge and understanding to comply with this policy. All SAT Consulting and Construction Inc. employees are encouraged to bring forward suggestions which could improve the ability of SAT Consulting and Construction Inc. to conduct its business in an environmentally responsible manner.

Sergio A. Torres
President & General Manager

Date

SECTION B - SAFETY ACTIVITIES

Daily Toolbox Talks:

Conducted by Front Line Supervision on field projects prior to the commencement of work each day.

Objective:

To discuss the safety aspects of the work to be carried out that day and any specific hazards.

Topics will be specific and pertinent to the work at hand.

Weekly Safety Meeting:

A general safety meeting in which all employees are required to participate. A forum for safety training, education, employee concerns and the communication of safety related information. A running action log to facilitate follow-up action on items or concerns which cannot immediately be addressed will be maintained.

Planned Jobsite Safety Inspections (Weekly - Minimum Requirement):

Planned (or formal) safety inspections conducted weekly by Supervision and Safety. Items arising from this inspection, i.e. deficiencies, comments, remedial action required, are recorded on the "Planned Jobsite Inspection" form. Action to be taken and completion dates are assigned to the applicable supervisor.

Planned Job/Task Observation:

Objective:

To observe how a worker performs a task in order to eliminate risk of injury to that worker. Job / task observation will be carried out on a continuous basis.

Field Level Risk Assessment (FLRA)

Policy:

All SAT Consulting and Construction Inc. job sites shall have workers participate in field level risk assessments prior to starting work or when the work process changes which may render the original assessment deficient.

Objective:

To assist workers in the identification of the job task to be performed, the “day of” hazards associated with the task, assessing the risks and controlling the hazards to an acceptable level of risk.

SECTION C – EMPLOYEE SELECTION

Competent Workforce:

SAT Consulting and Construction Inc. insists that certain on the job requirements be met:

- i. Safety
- ii. Productivity
- iii. Quality
- iv. Cost Effectiveness

In order to meet these requirements, SAT Consulting and Construction Inc. will employ only workers who have the appropriate knowledge, skill, and attitude.

SAT Consulting and Construction Inc. will ensure that all personnel are competent to perform the work assigned or are working under the direct supervision of a competent worker. Where Government certification is required, only properly licensed workers will be assigned the work.

SECTION D - TRAINING PROGRAM

Purpose:

This policy is to provide for general and specialized safety and related training throughout all levels of the organization.

Policy:

SAT Consulting and Construction Inc. will provide and employees will be required to participate in all safety related training that is necessary to improve performance.

Orientation:

New Employees:

All new employees and sub contractors will have the SAT Consulting and Construction Inc. safety manual reviewed prior to any work starting. The Supervisor will subject the new employees to questions about the manual to ensure they have retained the information.

After the review of the safety manual a tour of the shop to show the physical locations of the muster point and the safety gear along with exists.

All employees must attend the orientation of the prime contractor of each site to enter if required by the Prime contractor.

Senior Employees:

Every five years of service requires a refresher of the Safety Manual to ensure clarity of the information and that it has not been lost or misinterpreted.

Requirements:

Supervisors/ Managers:

All Supervisors and Managers must attend safety leadership courses to help identify and audit safety performances of their employees and knowledge of the codes set further by the Alberta OH&S. It is their responsibility to send employees for training require to perform job task safety.

Employees:

All employees must be trained for any tasks requested to be perform while working for SAT Consulting and Construction Inc.

le: Excavating, Operator, driving.

Record Keeping:

All training records are kept in the main office and the office administrator reviews the records monthly and flags when training is about to be expiring and books the training for the employees.

SECTION E – DISCIPLINARY ACTION

This policy will come into effect in the event of any safety violation / infraction.

Policy:

Where it is determined by SAT Consulting and Construction Inc. Management that the taking of disciplinary action against an employee is necessary, and where that employee's action or performance is not considered by management as grounds for immediate termination of employment, a four step program of disciplinary action may be implemented.

- i. Verbal warning
- ii. Written warning
- iii. Suspension (where applicable)
- iv. Termination of employment

The implementation of this program does not preclude SAT Consulting and Construction Inc. Management from exercising its managerial right to terminate the employment of a worker where proper and sufficient cause exists.

Procedures for Disciplinary Action:

i. Verbal Warning:

- a. Employee is warned verbally that his / her action is not acceptable to SAT Consulting and Construction Inc.
- b. Employee advised that the "verbal warning" will be supplemented by a written record which will be placed in the employee's file for future reference if necessary.
- c. At Management's discretion, the employee may be given a period of probation in which to confirm a positive response to the disciplinary action.
- d. At Management's discretion, the record of the "verbal warning" may be moved from the employee's personnel file upon successful completion of the probationary period.

ii. Written Warning:

- a. Employee is warned, in writing, that his / her action is not acceptable to SAT Consulting and Construction Inc.
- b. Employee will be requested to sign the "Notice of Safety Violation" as acknowledgment that he / she has received and understands the action taken (employee has the right to refuse to sign).
- c. At Management's discretion, the employee may be given a probationary period in which to confirm a positive response to the disciplinary action.
- d. A copy of the "written warning" shall be placed in the employee's personnel file for future reference if necessary.
- e. At Management's discretion, the record of the "written warning" may be removed from the employee's personnel file upon successful completion of the probationary period.

iii. Suspension:

At Management's discretion, and where an employee fails to respond favorably to previous disciplinary action, that employee may be suspended for a period of time without pay.

iv. Termination of Employment:

Where an employee fails to respond favorably to previous disciplinary action, the employee will be advised that his / her employment with SAT Consulting and Construction Inc. is terminated.

Termination for Cause / Conditions for Re-hire:

- i. Where an employee's action is considered by SAT Consulting and Construction Inc. Management as proper and sufficient cause for immediate termination of employment, employee will be advised that his / her employment with SAT Consulting and Construction Inc. is terminated.
- ii. The availability of re-hire is at the discretion of SAT Consulting and Construction Inc. Management.

Harassment or Violence

SAT Consulting and Construction Inc. is committed to a healthy, harassment and violence-free work environment for all our employees. Any act of harassment or violence committed by an employee against another employee will be considered employee misconduct. It is SAT Consulting and Construction Inc. policy to impose discipline relative to the seriousness of the offence, up to and including dismissal.

i. Definition:

“Harassment and Violence” whether at a work site or work related, means the threatened attempt or actual conduct of a person that causes or is likely to cause physical injury or mental anguish that:

- a. Submission of such conduct is made either explicitly or implicitly a term of or condition of an individual's employment,
- b. Submission to or rejection of such conduct by an individual affects that individual's employment.”

Harassment may include any of the following if a reasonable person should have known that such behaviour would be unwelcome and offensive

- verbal abuse or threats 1
- unwelcome remarks, jokes, innuendos or taunting about a person's body, attire, age, marital status, ethnic or national origin or religion 1
- displaying of pornographic, racist or other offensive or derogatory pictures 1
- practical jokes which cause awkwardness or embarrassment 1
- unwelcome invitations, requests or other activities, whether indirect or explicit 1
- that cause intimidation or fear 1
- leering or other gestures 1
- condescension or paternalism which undermines self-respect 1
- unnecessary physical contact such as touching, patting, pinching, punching 1
- physical assault 1

The behaviour may not be intentional in order to considered sexual harassment. If it is offensive and it intimidates others, it will not be tolerated within our company.

ii. Procedure:

If you are being harassed or threatened with violence

- a. Tell the individual his/her behavior is unwelcome and ask him / her to stop.
- b. Keep a record of incidents (dates, times, locations, witnesses, what happened, your response).
- c. If after asking the harasser to stop his/her behavior, the harassment continues, report the problem to one of the following individuals:
 1. Your immediate supervisor
 2. Department Manager
 3. Personnel Administrator
 4. President & General Manager

iii. Dealing with the Complaint

- a. Once a complaint is received, it will be kept strictly confidential. An investigation will be undertaken immediately and all necessary steps taken to resolve the problem.
- b. The complainant and the alleged harasser will be interviewed separately along with any individuals who may be able to provide relevant information. All information will be kept strictly confidential.
- c. If the investigation reveals evidence to support the complaint, the harasser will be disciplined appropriately. Discipline may include suspension or dismissal and the incident will be documented in his / her file. No documentation will be placed in the complainant's file where the complaint is filed in good faith, whether the complaint is upheld or not.
- d. If the investigation fails to find evidence to support the complaint, there will be no documentation concerning the complaint placed in the file of the alleged perpetrator.
- e. Regardless of the outcome of a harassment or violence complaint made in good faith, the employee lodging the complaint, as well as anyone providing information, will be protected from any form of retaliation by either co-workers or superiors.

Responsibility of Management:

It is the responsibility of a manager or any person within this company supervising one or more employees to take immediate and appropriate action to report or deal with incidents of harassment whether brought to their attention or personally observed. Under no circumstances should a legitimate complaint be dismissed or downplayed or the complainant told to deal with it personally.

Alcohol & Drug Policy

It shall be at the discretion of SAT Consulting and Construction Inc. supervisors to invoke the alcohol & drug procedure as set out in Section N of SAT Consulting and Construction Inc. Health and Safety Manual, at any stage of these disciplinary action guidelines.

SECTION F – ACCIDENT / INCIDENT REPORTING, RECORDING & INVESTIGATING

Policy:

All accidents / incidents, regardless of severity, must be reported, following Alberta's OH&S codes, act and regulations

Reporting Guidelines:

- i. Accident causing injury / illness:
 - a. Inform your supervisor immediately.
 - b. Obtain first aid treatment:
(If for some reason your supervisor is not immediately available, obtain first aid treatment and advise your supervisor as soon as is reasonably possible.)
- ii. Accident causing property / equipment damage:
 - a. Secure the area / equipment to prevent injury or any further damage.
 - b. Report the accident to your supervisor.

Definition:

"ACCIDENT" - An undesired event that results in injury or illness, property or equipment damage, or loss of production.

"INCIDENT" - An undesired event which under slightly different circumstances could have resulted in injury / illness, or equipment damage, or loss of production (often referred to as a "near miss".)

Responsibilities:

Report the circumstances to your supervisor immediately.

Incident Investigation:

All accidents / incidents will receive an appropriate degree of investigation. No accident investigation shall be considered complete until the General Manager has signed off report.

SECTION G - EMERGENCY RESPONSE PROCEDURES

First Aid Treatment Records:

SAT Consulting and Construction Inc. will provide, maintain, and monitor workplace First Aid Records at each worksite. Management will review Record Book periodically to ensure corrective action and specified parties do follow up. SAT Consulting and Construction Inc. will keep on record the First Aid Records for a minimum period of three (3) years.

Emergency Response - (Field Services):

Due to the nature of our business, Field Services employees will find themselves working on various types of construction owner sites. Therefore, it is the responsibility of the SAT Consulting and Construction Inc. Site Superintendent to ensure that all SAT Consulting and Construction Inc. employees under his supervision are familiar with and fully understand the emergency evacuation procedures on that particular site.

Note: Normally, emergency evacuation is included as an integral part of the construction owner's site orientation for new-hires.

SECTION H – PLANNED MAINTENANCE PROGRAM

Equipment Safety Maintenance:

i. Policy:

All SAT Consulting and Construction Inc. equipment will be maintained in a manner which will ensure safety and reliability.

ii. Objective:

To prevent accident, injury, or damage occurrence as the result of the use of defective, unsafe equipment.

To ensure that in the event of an incident, safety equipment, devices, and fire fighting equipment operate successfully.

iii. Equipment:

Equipment covered by this policy includes, but is not limited to the following.

Tools:

- Power tools
- Hand tools

All tools will be routinely inspected for defects prior to being used or returned to inventory.

Safety Equipment:

- Respiratory Protective Equipment
- Life Lines
- Fall Prevention Devices

Fire Fighting Equipment

- Extinguishers

All fire extinguishers will be visually inspected monthly.

Dry Chemical: Pressure check, seal check

Carbon Dioxide: Seal check Water:

Pressure check, seal check

Water (Stirrup Pump Type): Water content

"DO NOT RELY ON OTHERS - MAKE SURE EQUIPMENT IS SAFE TO USE BEFORE YOU USE IT".

Vehicles:

All vehicles either owned or leased by SAT Consulting and Construction Inc., will be maintained in a manner that will ensure the health and safety of all SAT Consulting and Construction Inc. personnel using these vehicles. A "walk around" of these vehicles will be performed prior to each use and regular recommended manufacturer's maintenance will be done as warranted. The Operator will enter records of maintenance into the Vehicle Log Book.

SECTION I – SAFE WORK PRACTICES

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2. Planned Jobsite Inspection
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SECTION K - MODIFIED WORK PROGRAM

Policy:

SAT Consulting and Construction Inc. will make every reasonable effort to provide a Modified Work Program for each injured or ill employee.

Purpose:

To provide modified work alternatives which allow an injured worker to return to work at the earliest opportunity in a job that accommodates the injury restrictions and provides a safe environment from re-injury or risk to others.

Definition of Modified Work:

Modified work is any job, task, function or combination of tasks or functions which are meaningful and productive to the employer's operations and can be safely performed by a worker in keeping with compensable medical restrictions.

Modified work may incorporate regular work that has been:

- changed
- redesigned
- physically modified
- decreased in volume
- decreased in time, and
- can include training opportunities

The modified work will contribute toward the worker's rehabilitation by keeping the worker active and involved in the workplace and provide for gradual restoration to the worker's pre-accident physical capabilities.

Participation in a modified work program requires consent of both the worker's physician and / or attending physician and the WCB case manager.

Benefit of Modified Work:

Worker Benefits:

By participating in a claims management program, injured workers will:

- enhance their rehabilitation
- reduce any sense of estrangement or isolation from the work environment
- reduce risk of re-injury on return to work
- maintain contact with co-workers and friends
- minimize loss of employment fitness
- minimize risk of employment loss
- provide gradual re-adaptation to the physical demands of the workplace
- maintain their dignity and self-respect by remaining productive

Employer Benefits:

By participating in a claims management program, employers will:

- assist in an injured worker's rehabilitation process
- retain skilled workers
- minimize productivity loss
- reduce accident costs
- reduce unnecessary lost time
- reduce cost of hiring and training replacement workers, and
- Maintain good will and employee relations.

SECTION L – ALCOHOL AND DRUG POLICY

Policy:

SAT Consulting and Construction Inc. is committed to a safe and healthy working environment for its employees, subcontractors and clients.

Purpose & Scope:

The intent of this procedure is to minimize and eliminate any negative effects due to the use of alcohol or drugs on SAT Consulting and Construction Inc. work sites.

This procedure shall apply on all sites where the owner / client stipulates the implementation of a formal drug / alcohol testing procedure or where the owner / client stipulates compliance with in-house drug / alcohol testing procedures. In the event of any procedural discrepancies, the owner / client procedure shall take precedence.

Responsibilities:

Supervisors:

SAT Consulting and Construction Inc. will ensure that all supervisors have been trained and educated on identification and handling of individuals whose performance may be affected by alcohol or drugs.

All Employees':

It shall be the responsibility of all employees' to report to work fit for duty, free from the effects of alcohol or drugs.

Standards:

No employee shall distribute, possess, consume or use alcohol or drugs (as defined under definitions) on any "SAT Consulting and Construction Inc. site" (as defined under definitions) or in any "vehicle" (as defined under definitions) or other equipment. No employee shall report to work with an alcohol level which exceeds forty (40) milligrams of alcohol in one hundred (100) millilitres of blood, urine or saliva. No employee shall report to work or be at work with detectable levels of any drug in their body.

Testing Conditions:

Compliance through Alcohol & Drug Testing

To ensure a safe work environment and compliance with the minimum standards, incident specific (as opposed to random) alcohol and drug testing will be performed under the following circumstances:

1. Reasonable Grounds

When an Employee's Supervisor believes, on reasonable grounds, that the employee may be in breach of the standards concerning detectable levels of alcohol or drugs, the company may require the employee to submit to an alcohol and drug test.

For greater clarity and by way of example only, "reasonable grounds" as referred to above, includes:

- A specific situation where the smell of alcohol is detected on an employee's breath at work, and / or
- A general situation where an employee is acting in a suspicious or unusual manner or where an employee has been unable to correct a chronic performance or behaviour problem at work, which gives rise to a reasonable suspicion on the part of the employee's supervisor that the employee may have consumed or used alcohol or drugs at work or may be under the influence of alcohol or drugs, and which suspicion cannot, when confronted, be dispelled by the employee to the satisfaction of the supervisor.



2. Accident or Other Incident

When an employee is involved in an accident, a near miss or other potentially dangerous incident on a SAT Consulting and Construction Inc. site the supervisor of that employee, after consultation, may require the employee to submit to an alcohol and drug test immediately following the accident or incident or as soon as is practicable under the circumstances, unless the supervisor reasonably believes that consumption or use of alcohol or drugs was not a factor in the occurrence of such accident or incident.

3. Legal Compliance

Where stipulated by statutory requirements, pre-employment and random testing shall be performed in addition to the above criteria.

Non Compliance

a. Refusal of Testing

Any employee who refuses to submit to, or provide samples for an alcohol and drug test, shall be precluded from working on any SAT Consulting and Construction Inc. or client / owner site where stipulated.

b. Test failure

Any employee who fails to meet the standards may be subject to dismissal and / or corrective measures as defined in this procedure.

Use of Prescription and Non-Prescription Drugs:

Any employee who is using a prescription or non-prescription drug must only take that drug as directed, and should be aware of any potentially unsafe side effects. If the employee is unsure about the side effects of a prescription or non-prescription drug, then the employee should consult with a physician, nurse or pharmacist. If there are potentially unsafe side effects the employee must notify his/her supervisor before reporting to work.

Definitions:

For purposes of these standards:

“Alcohol and Drug Test”:

- a. A test to determine the presence of alcohol or drugs in the body through laboratory analysis of a blood or urine sample, OR
- b. A screening test or other preliminary means of detecting the presence of alcohol or drugs in the body without laboratory analysis.

“SAT Consulting and Construction Inc. Site” means any entity which employs the use of SAT Consulting and Construction Inc. personnel on their site.

“Drug” or “Drugs” means any harmful substance (including solvents) or any drug, other than a prescription drug that is used by the Employee for whom it is prescribed and as directed by the prescription and any non-prescription medication used as directed by the manufacturer.

“Employee” means a SAT Consulting and Construction Inc. employee.

“Rehabilitation Program” means a program that is tailored to address each individual’s particular situation, ranging from education and counseling to and including residential treatment.

“Owner/Client Site” means any lands or premises with the exception of camp accommodation or specified area located on Client lands.

“Vehicle” means any on road or off road vehicle used by SAT Consulting and Construction Inc. on an owner/client site, including any buses whether owned or chartered by SAT Consulting and Construction Inc. or a contractor to transport employees or other workers to or from an owner/client

“Work” includes training and any coffee, lunch, supper or other breaks from work while on an owner/client site.

SITE RULES AND REGULATIONS

In addition to owner/client site rules, misconduct on the job site including but not limited to the following, is prohibited and shall result in discipline and/or termination of employment.

- Theft of company or other employee's property.
- Excessive absenteeism or lateness.
- Falsifying reports, records, or making false statements concerning personnel, safety, absence, sickness, investigations.
- Using or punching in an identification card other than your own.
- Leaving work area or jobsite without proper authorization.
- Smoking in prohibited areas.
- Possession, under the influence and/or use of alcohol or illegal drugs or their conveyance on company premises.
- Entering the jobsite under the influence of alcohol or drugs.
- Being in possession of any firearm or weapon on company premises.
- Abuse or destruction of property, equipment or tools.
- Horseplay, gambling, fighting, or sleeping on the jobsite.
- Failure to use or wear proper safety equipment.
- Use of personal electronic equipment during hours on the jobsite (i.e. radios, transistors, headsets, etc.)
- Abusive language or conduct of an abusive nature.
- Harassment (sexual or otherwise) of other employee's.

SECTION M – HAZARD IDENTIFICATION

Policy:

SAT Consulting and Construction Inc. is committed to ensuring all jobsites and new tasks have a hazard assessment completed by their employees, sub contractors.

Purpose and Scope:

The intent of this procedure is to ensure all hazards that can be found on the jobsite can be identified and a control put in place to create a safety work area for any employee or client.

Also for new tasks that arise in the work place must have a hazard assessment completed on it and a control put in place to ensure the safety of all workers affected by the task.

Responsibility:

Supervisors:

SAT Consulting and Construction Inc. will ensure that all supervisors have been trained and educated on Hazard identification and auditing of the assessments to ensure a high quality assessment.



All Employees':

It shall be the responsibility of all employees' to ensure hazard assessments are created or reviewed prior to commencing work.

Standard:

No work will be started by any SAT Consulting and Construction Inc. Employee or sub contractor until a hazard assessment is created or reviewed and audited by the Supervisor.

If a new task comes up in the middle of a job all work will stop and the hazard assessment on the new task will be completed and reviewed by the workers affected by the task.

Hazard assessments must be carried by one of the workers who reviewed the assessment.

SECTION O – Roles and Expectation

Policy:

SAT Consulting and Construction Inc. is committed to ensuring that all roles and expectation are communicated and reviewed with all employees and sub-contractors.

Purpose and Scope:

The intent of this procedure is to ensure that all employees or sub-contractor worker for SAT Consulting and Construction Inc. Know their duties and responsibilities.

Responsibility:

Supervisors:

SAT Consulting and Construction Inc. will ensure that all supervisors know and enforce the safety manual for all employees and sub -contractors. If new items are required to be in the safety manual it must be updated and reviewed with the employees.

All Employees:

It shall be the responsibility of all employees' to ensure that they review the safety manual and follow it on all job sites.

SECTION P – Sub Contractors

Policy:

SAT Consulting and Construction Inc. is committed to ensuring that all Sub Contractors Follow the SAT Consulting and Construction Inc. safety manual while under their employment.