



SAFETY POLICY

Spongberg Enterprises Ltd is committed to the health and safety of all employees and contractors and to the protection of the environment as it applies to our operations. The ultimate goal of our health and safety policy is to have an accident free environment and protection from accidental loss. All employees of Spongberg Enterprises Ltd are responsible for ensuring that the safety program is developed and maintained. Employees at every level are responsible and accountable for Spongberg Enterprises Ltd overall safety initiatives. We ask our employees and contractors to take responsibility in upholding this commitment by applying the following guiding principles:

- Ensure you are adequately prepared; follow proper procedures and practices by complying with all regulatory requirements and exercise sound judgment and common sense when undertaking any work related tasks.
- Take an active approach to understanding any potential health, safety or environmental issues that may pertain to work undertaken as an employee or contractor of Spongberg Enterprises Ltd.
- All employees must work in a safe manner, with a safe attitude, in order to avoid personal injury and so as not to injure their fellow workers.
- Approach management about any issues relevant to the safety program that you feel would improve the health or safety of Spongberg Enterprises Ltd employees, contractors, or the environment.
- Remain sensitive to the concerns of the public.
- Identify and report any safety hazards and unsafe work conditions or inadequately equipped or trained personnel to management immediately.
- Do not participate in any activities you deem unsafe; you have the right to refuse unsafe work. You are not expected to sacrifice the safety or well-being of personnel for expediency or any other reason.
- Read, understand, and follow the requirements of the Company Safety Manual.
- Management is committed to protect people and property to provide and maintain a safe and healthy work environment.

All Spongberg Enterprises Ltd employees and contractors are responsible for obeying all safety rules, following recommended safe work procedures, wearing and using personal protective equipment when required, participating in safety training programs and informing supervisors of any unsafe work conditions.

The safety information in this policy does not take precedence over the Occupational Health & Safety Act or the Regulations.



Housekeeping

All floors must be kept clean and free from materials or equipment that could cause workers to slip or trip. This must be maintained daily as part of the job you are working on.

Vehicle Traffic Control

When working outside the office you are required to wear Nomex coveralls with reflective strips around the arms, legs, and back to be visible. When our work is being done on or around public roads you must rent signs warning oncoming traffic that you are working ahead.

If the vehicle you are driving breaks down pull off the road as far as you can, then ensure you turn on your four-way flashers so that you are visible.

Worker Competency

A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision. Work that may endanger a worker must be completed by a worker who is competent to do the work, or by a worker who is working under the direct supervision of a worker who is competent to do the work. All workers must be trained in procedures until they are competent. Spongberg Enterprises Ltd has a mentoring program whereby all new "green" workers must shadow and assist a competent worker until it is determined through training, observation of ability, and experience that that worker is competent. An experienced new worker must also follow our mentorship program.

It is your responsibility to refuse to perform work that you are not competent to perform.

Maintenance of Equipment

Any equipment used during normal work operations should be maintained in safe running condition. Ensure regular inspections and/or calibrations have been made on any rented or third party equipment. If any equipment is obviously faulty (H2S meter failed bump test, equipment will not turn on, etc) they must be taken out of service immediately. All equipment must be kept maintained and be safe to perform its intended task, adequate strength for its purpose and free from obvious defects.

Vehicle inspections must be done daily, with proper mechanical inspections completed annually. All maintenance records must be filled out, and all damaged and faulty equipment must be reported immediately. A professional will determine if the equipment may be used or if it needs immediate repair.



Tire Servicing

Spongberg Enterprises Ltd employees are not qualified to inspect, disassemble and reassemble a tire or tire and wheel assembly. This service must be performed by professionals and NO employees are allowed to perform this task.



PERSONAL PROTECTIVE EQUIPMENT

It is a requirement that all Spongberg Enterprises Ltd employees must wear appropriate Personal Protective Equipment whenever there is a foreseeable danger. If the hazard assessment indicates the need for personal protective equipment (PPE) workers must:

- ❖ Wear PPE that is correct for the hazard and that protects themselves;
- ❖ Properly use and wear the PPE that is in a condition to perform the function for which it was designed.

Workers are trained in the correct use, care, limitations and assigned maintenance of the PPE in the orientation and yearly after that. A worker must use and wear properly, the appropriate PPE specified in accordance with the training and instruction received, inspect the PPE equipment before using it, and not use PPE that is unable to perform the function for which it is designed. The use of PPE itself must not endanger the worker. All Employees are responsible to maintain, clean, and inspect their own Personal Protective Equipment.

Head Protection: Employees working in areas where there is potential for injury to the head either from employee initiated impact or impact from falling or other moving objects must wear an appropriate protective head protection. Head Protection must meet or exceed the requirements of the Canadian Standards Association. This includes at any active wellsite or facility and any site where heavy equipment is working.

Head Protection must be inspected prior to every use to ensure that it is free from cracks, and/or deep scratches. Head Protection must be worn properly every time. Employees must review their Head Protection as many have dates of discard. Certain types of materials can break down over time and must be replaced prior to date of discard. All Spongberg Enterprises Ltd employees are required to maintain all Head Protection. Cleaning should be completed using soap and water, never chemicals.

Foot Protection: Employees must wear the appropriate protective footwear for the work that is being performed. Foot Protection must meet or exceed the requirements of the Canadian Standards Association (CSA) when working in areas where there is a danger of foot injuries due to falling or rolling objects, or from an object piercing the sole. If handling chemicals or walking on uneven surfaces the footwear must be chemical resistant and cover the ankles. Steel toed and steeled shank boots are to be worn at **all** sites (except office).

Foot Protection must be inspected prior to every use to ensure that it is free from tears, cracks, holes, or any damage. Foot Protection must be worn properly at all times. If the footwear has laces, they must be completely tied up at all times. All Spongberg Enterprises Ltd employees are required to maintain all Foot



Protection. Cleaning should be completed using soap and water, never chemicals.

Hand Protection: Employees must use appropriate hand protection when their hands are exposed to hazards such as those from skin absorption or harmful substances or from extreme heat or cold.

Hand Protection must be inspected prior to every use to ensure that it is free from tears or damage. Hand Protection that has been stained from an unknown source should never be used. All Spongberg Enterprises Ltd employees are required to maintain their hand protection. Cleaning should be completed by using soap and water (never chemicals).

Work gloves must be used when doing any manual labour.

Eye Protection: Employees must wear CSA Safety Glasses in situations where dust, solids, air at high pressure, or liquids other than rain may get in their eyes. Safety glasses are required on all facility sites and where heavy equipment is working.

Eye Protection must be inspected prior to every use to ensure that it is free from cracks or scratches. Eye Protection must be worn properly at all times. If working outside employees may want to wear tinted Eye Protection to protect from UV Rays. All Employees are required to maintain their Eye Protection. Cleaning should be completed using eye protection cleaner as other liquids can scratch, melt, or damage the lenses.

Prescription eyewear may be worn if it is safety eyewear and complies with Section 229(1). Must meet CSA Standard Z94.3 Industrial Eye and Face Protectors.

All employees must inform Spongberg Enterprises Ltd if they wear Contact Lenses. Spongberg Enterprises Ltd must document this and advise the Employee of any hazards to the employee's eye during the work to be performed. Spongberg Enterprises Ltd must also advise the employee of suitable alternatives to wearing Contact Lenses.

Limb and Body Protection: If there is a danger that a workers hand, arm, leg or torso may be injured, workers must wears properly fitting hand, arm, leg or body protective equipment that is appropriate to the work, the work site and the hazards identified. Examples of this include: warm weather clothes, chainsaw pants, rattlesnake guards, etc.



When working around chemicals that could cause an adverse affect to skin if contact is made workers must wear impermeable apron, gloves, and eye protection.

Body Protection Against Flame: Flameproof overalls must be worn in any situation in which there are flammable liquids or flammable gases stored or used or piped on a site. This includes all active wellsites, facilities, and pipelines. Flameproof overalls must meet or exceed CSA and Industry Guidelines.

Body Protection must be inspected prior to every use to ensure that it is free from tears or holes. Body Protection must be worn properly at all times. It must be zipped up completely and not left hanging. Never wear Body Protection if it has a stain from an unknown substance. Employees must wear clothing under the Body Protection that is made of flame resistant fabric or natural fibres that will not melt when exposed to heat.

If the risk of heat exposure is greater than that of a likely explosion the risks must be assessed and a determination of whether flameproof overalls are required must be completed and discussed with the Client (oil company).

Employees must wear any other Personal Protective Equipment deemed necessary by a Hazard Assessment.

In addition, an Employee must not use any Personal Protective Equipment that is in a condition that makes it unable to perform the function for which it is designed.



HAZARD ASSESSMENT

Spongberg Enterprises Ltd believes the best method of preventing injury or loss is by knowing what the potential hazards are. This is done in two ways:

- The first is a review of all common workplace and field tasks and hazards. This is completed annually and is completed with all affected workers.
- The second is at the work site level to identify existing or potential hazards. This hazard assessment must be done before work begins at the work site and prior to the construction of a new work site. It must be repeated at reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions, when a new work process is introduced, or when a work process or operation changes.

All affected workers, visitors, and clients on site must participate in the hazard assessment; if someone arrives late they must be informed of the information on the Hazard Assessment form. All daily hazard assessments must include (in writing) documentation of workers names, date, hazards, controls, severity and probability. If the work is deemed too hazardous it must be stopped immediately until proper controls can be put in place. Please fill out the Hazard Assessment form provided by Spongberg Enterprises Ltd.

Once the Hazard Assessment has been completed, all Employees must report any unsafe or harmful conditions including a list of potentially harmful substances found during the inspections if they cannot be fixed immediately. If a hazard is noticed during the shift employees can report these hazards verbally to other Employees, but they must follow that verbal report with a written report once it is practical to do so. If the hazard is severe, work must be stopped and the hazards reassessed. Reports of hazards submitted to the Spongberg Enterprises Ltd must always be written.

Controlling the Hazard

If possible, all hazards must be eliminated. If the hazard cannot be eliminated then Engineering, Administrative and/or PPE controls must be put in place. Engineering controls are incorporated into the process itself, sometimes as part of the equipment. Substitution could be one engineered method to follow. Administrative controls are used to minimize the exposure to a hazard by worker training and worker rotation. If the engineering or administrative controls do not achieve enough of a control then Spongberg Enterprises Ltd must ensure the appropriate PPE is used by workers affected by the hazard. A combination of engineering, administrative and PPE controls may be the best method to achieve a greater level of worker safety.

Communication to Affected Workers, Bystanders and Visitors

Spongberg Enterprises Ltd will appoint a representative at every worksite to control access to individuals and ensure that workers affected by the hazards



identified in a hazard assessment report are informed of the hazards and the methods used to control or eliminate the hazards.

Emergency Control of a Hazard

In the event of an emergency (dangerous to the safety or health of workers) only those workers competent in correcting the condition, and the minimum number of workers necessary to correct the condition may be exposed to the hazard. Every reasonable effort must be made to control the hazard while the condition is being corrected.



SAFEGUARDS

The purpose of the Safeguards policy is to protect and educate employees and contractors from injury caused by removing, tampering, disabling or bypassing physical safeguards.

At no time should any of the machinery or equipment at Spongberg Enterprises Ltd be used without a safeguard, if equipped. Alternatively, if the supervisor determines that an effective safeguard cannot be provided in the circumstances, the employer must ensure that an alternative mechanism or system or a change in work procedure is put into place to protect workers from being exposed to hazards that exist if there is no safeguard.

It is essential that all Spongberg Enterprises Ltd workers read, understand, and comply with safe work practices and procedures for the following equipment that have Safeguards:

Specific pieces of equipment that have Safeguards:

- Grinders
- Drill Press
- Paper Shredder

A hazard assessment has been completed on the above equipment or machinery. The appropriate Personal Protective Equipment must be worn when working with the machinery or equipment.

CSA Requirements

Spongberg Enterprises Ltd must ensure that the design, installation, operation and maintenance of safeguards meet the requirements of CSA Standard Z432_04, Safeguarding of Machinery. This is best done in the purchase stage; prior to purchasing any equipment it must be assured that it meets this CSA Standard.

Inspection

The employees of Spongberg Enterprises Ltd have the responsibility to inspect the equipment or machinery before each use and monthly; the monthly inspection must be recorded on Spongberg Enterprises Ltd Equipment Inspection Form.

- A Spongberg Enterprises Ltd worker must ensure that the equipment or machinery is inspected thoroughly at the beginning of the shift to ensure that it is functional and safe.
- If the machinery or equipment is deemed unsafe then must be removed from operation until repaired.



Removing, Tampering or Disabling Safeguards

An Spongberg Enterprises Ltd employee is never to remove, tamper, or disable any safeguard from a machine that is operating if the safeguard is not designed to be removed when the machine is operating. The only time it is acceptable to remove a safeguard or make it ineffective is when it is necessary to perform maintenance, tests, repairs, adjustments or other tasks on equipment at that time the safe work procedure will be followed. All Spongberg Enterprises Ltd employees, when doing maintenance on the machinery or equipment, must follow the lockout-tag out procedures and render the equipment or machinery inoperative.



WORKING ALONE

“Working Alone” means to work alone at a work site in circumstances where assistance is not readily available in the event of an injury, illness or emergency.

Policy

Working alone in certain circumstances, situations, or environments is unsafe and requires special arrangements to minimize potential hazards. “Alone” means beyond the visual or audible range of any other individuals for more than a few minutes at a time.

All Spongberg Enterprises Ltd personnel who work alone should be competent in their tasks, know their responsibilities, and when in doubt ask for help.

All reasonable steps must be made to eliminate any identified hazards, alternatively steps must be made to control any identified hazards if it is elimination of the hazard is not feasible. When the hazards cannot be eliminated or controlled to an acceptable level, two people will be required to complete the work. Examples of this include working around high rattlesnake or bear populations, very remote site assessments (with no available cell service), a field with buffalo or bulls (with no vehicle access), a highly hazardous task, etc.

The hazard assessment should be completed as much as possible, prior to going into the field to eliminate making two trips; unknown hazards should be added once on site. If it appears a significant hazard has been identified take a second person for safety. To assess this hazard records of past incidents and measures or actions taken should also be assessed.

Procedure

Since the working schedule is never routine, it is imperative to provide either in writing or by phone (your Spongberg Enterprises Ltd contact must then write it down) a schedule. This schedule must include specific sites (either by LSD or general area), the hazards (ex: sour gas, remote locations, wild or farm animals, bad roads, adverse weather conditions), and check in times. When the schedule has changed the worker who is working alone must notify the contact within 1 hour.

An effective means of communication (radio, telephone, GPS phone, or other electronic communication devices) between the worker and persons capable of responding to the workers needs must be established. If no effective means of communication can be established, a Spongberg Enterprises Ltd member will visit the worker or ensure the worker contacts the company at regularly assigned intervals.



For emergencies, ensure a contact person has all of the same information on the Working Alone Schedule. Emergency work will likely require additional call-ins to keep the contact up to date on location and changing hazards.

Overdue Worker Response Plan

The worker has within one hour to call the Spongberg Enterprises Ltd contact person to tell them of any changes or to check in (unless the worker has asked this to be more stringent). If the worker fails to make contact within one hour, the Overdue Workers Response Plan will be initiated.

The following will be initiated one hour after contact was supposed to be made:

- Spongberg Enterprises Ltd will attempt to contact the worker by cell phone, home number, hotels number, and/or radio.
- The client or other workers in the area (local contact) will then be notified and a plan to locate the worker will be initiated.
- Continual attempts will be made to contact the worker, also a call to the workers spouse, significant other, parents or other emergency contacts to see if they have heard from them and to keep them posted will be made.
- The local contact will physically go to locations specified on the contact sheet.
- Local hospitals will be called to see if the worker has been admitted.
- The local police or RCMP will be notified with a request for assistance.

When the worker is located all members involved in the search must be notified immediately.

The Overdue Workers Response Plan involves a considerable amount of time, effort, and expense for a number of people. For this reason workers should recognize their responsibility to maintain a reasonable level of contact at all times.



TOOLS, EQUIPMENT AND MACHINERY

The purpose of this policy is to protect and educate employees and contractors. It is essential that all Spongberg Enterprises Ltd workers read, understand, and comply with these safe work practices and procedures for Tools, Equipment and Machinery.

Training and Competency

All Spongberg Enterprises Ltd employees receive basic training for all tools, equipment and machinery they may be required to use at orientation and as needed after that. All workers must have the proper combination of experience, knowledge, and education to perform the work required.

Workers must be competent when working with all tools, equipment and machinery required to do their job. A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

All training documents are kept on file.

Potential High Risk Areas

Spongberg Enterprises Ltd has identified areas that workers may have potential contact between moving parts of machinery, electrically energized equipment or part of the work process with the workers clothing, jewelry or hair.

The following are some tools, equipment and machinery that are present at Spongberg Enterprises Ltd.

- Grinders
- Drill Press
- Paper Shredder

Preventing Contact

Spongberg Enterprises Ltd management, supervisors, workers ensure that:

- Clothing fits closely to the body;
- Bracelets, rings, dangling neckwear, a wristwatch or similar articles are not worn;
- Head and facial hair is short or confined and cannot be snagged or caught.

Machine Operator Responsibilities

Before starting machinery, all Spongberg Enterprises Ltd operators must ensure that starting or operation that the machinery will not endanger the themselves or another worker. The start-up of machinery can cause injury to workers near the machine if they are not aware that the machine is being started. If a machine



operator cannot see the machine or parts of the machine being operated from the control panel or operator's station, and moving machine parts may endanger workers, an alarm system must be installed. The alarm system may include sirens, buzzers, horns, flashing lights or a combination of these alarms. A combination of both visual (flashing lights) and audible (siren, buzzer or horn) alarm systems provides the best protection.



WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM (WHMIS)

The purpose of the WHMIS policy is to protect and educate employees and contractors. It is essential that all Spongberg Enterprises Ltd workers read, understand, and comply with safe work practices and procedures for WHMIS.

All controlled products that are used, stored, handled or manufactured at a work site are done so in accordance with WHMIS.

The WHMIS program is reviewed at least annually, but more frequently if required by a change in work conditions or available hazard information.

Training

WHMIS training is provided to all Spongberg Enterprises Ltd workers who work with or in proximity to a controlled product. A worker who works with a controlled product is any worker who stores, handles, uses or disposes of a controlled product or who immediately supervises another worker performing these duties. "In proximity" is the area in which the worker's health and safety could be at risk during storage, handling, use or disposal of the product, maintenance operations or in an emergency situation such as a spill or fire.

All training records are kept in a secure filing cabinet.

Spongberg Enterprises Ltd WHMIS Training includes:

- The content required to be on a supplier label and a work site label and the purpose and significance of the information on the label;
- The content required to be on a material safety data sheet and the purpose and significance of the information on the material safety data sheet (MSDS);
- Procedures for safely storing, using and handling controlled products;
- The procedures to be followed in case of an emergency involving the controlled product.

Material Safety Data Sheet (MSDS)

A material safety data sheet (MSDS) must be prepared for a controlled product produced or made at a work site and obtained for all commercial products used at a work site.

Spongberg Enterprises Ltd ensures that the most recent material safety data sheet for controlled products are kept at the work site where the product is being used. All MSDS must be the most up to date copy available and no more than 3 years old.



Supplier Label or Work Site Label

A controlled product or its container at a work site must have a supplier label or a work site label on it.

Supplier Label Requirements -

If a supplier label is not attached to a controlled product then the Spongberg Enterprises Ltd employee is not to use the material until the supplier gives you an MSDS and a supplier label.

A supplier label must appear on all controlled products received at Spongberg Enterprises Ltd and contain the following information:

- Product identifier - name of product;
- Supplier identifier - name of company that sold it;
- A statement that an MSDS is available;
- Hazard symbols the pictures of the classification(s);
- Risk phrases - words that describe the main hazards of the product;
- Precautionary measures (how to work with the product safely), and first aid measures (what to do in an emergency);
- All text in English and French;
- WHMIS hatched border.

Worksite Label Requirements -

A worksite label must appear on all controlled products produced in a workplace or transferred to other containers. Worksite labels may appear in placard form on controlled products received in bulk from a supplier.

These are the minimum requirements for workplace labels:

- Product identifier (product name);
- Information for the safe handling of the product;
- Statement that the MSDS is available;
- May contain the WHMIS hazard symbols or other pictograms.

A supplier label must not be removed, modified or altered on a container in which a controlled product is received from a supplier if any amount of the controlled product remains in the container. If the supplier label on a controlled product or its container is illegible or is removed or detached, an employer must immediately replace the label with another supplier label or a work site label.

Pipes and Reaction Vessels

Pipes and reaction vessels will be marked using colour coding, or placards.

Transferring of a Controlled Product

When transferring a controlled product you must ensure that a workplace label is placed on the new container.











When a controlled material is poured into a container that is going to be used immediately, no label is required.

Hazardous Waste

If a controlled product is a hazardous waste generated at the work site, Spongberg Enterprises Ltd ensures that it is stored and handled safely using a combination of any means of identification and instruction of workers on the safe handling of the hazardous waste. This waste will be sent to an approved facility for disposal.



WHMIS Symbols

	<p>Class A - Compressed Gas</p>	<p>Contents under high pressure. Cylinder may explode or burst when heated, dropped or damaged.</p>
	<p>Class B - Flammable and Combustible Material</p>	<p>May catch fire when exposed to heat, spark or flame. May burst into flames.</p>
	<p>Class C - Oxidizing Material</p>	<p>May cause fire or explosion when in contact with wood, fuels or other combustible material.</p>
	<p>Class D, Division 1 Poisonous and Infectious Material: Immediate and serious toxic effects</p>	<p>Poisonous substance. A single exposure may be fatal or cause serious or permanent damage to health.</p>
	<p>Class D, Division 2 Poisonous and Infectious Material: Other toxic effects</p>	<p>Poisonous substance. May cause irritation. Repeated exposure may cause cancer, birth defects, or other permanent damage.</p>
	<p>Class D, Division 3 Poisonous and Infectious Material: Biohazardous infectious materials</p>	<p>May cause disease or serious illness. Drastic exposures may result in death.</p>
	<p>Class E - Corrosive Material</p>	<p>Can cause burns to eyes, skin or respiratory system.</p>
	<p>Class F - Dangerously Reactive Material</p>	<p>May react violently causing explosion, fire or release of toxic gases, when exposed to light, heat, vibration or extreme temperatures.</p>



TRANSPORTATION OF DANGEROUS GOODS (TDG)

The purpose of this policy is to protect and educate employees and contractors. It is essential that all Spongberg Enterprises Ltd workers read, understand, and comply with this safe work practice for Transportation of Dangerous Goods.

This program will be reviewed yearly and update as often as necessary.

Training and Competency

All Spongberg Enterprises Ltd workers who handle, or transport dangerous goods or supervise those activities must be adequately trained and hold training certificate from an approved facility (Enform, AMTA, Danatec, etc).

Workers must be competent when working with Transportation of Dangerous Goods (TDG). A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision. All workers must have the proper combination of experience, knowledge, and education to perform the work required.

All training documents must be on file prior to the commencement of all TDG work.

TDG Training will include knowledge of:

- Shipping names;
- The shipping document requirements;
- The dangerous goods safety marks;
- The certification safety marks requirements;
- Means of Containment during shipping (choosing the appropriate shipping containers);
- The emergency response assistance plan;
- Accidental Release and Imminent Accidental Release Report Requirements;
- Safe handling and transportation practices for dangerous goods, including the characteristics of the dangerous goods;
- The proper use of any equipment used to handle or transport the dangerous goods;
- Emergency measures the person must take to reduce or eliminate any danger to public safety that results or may reasonably be expected to result from an accidental release of the dangerous goods.

Documentation

Before allowing taking possession of dangerous goods for transport, the consignor must prepare and give to that carrier a shipping document or, if the



carrier agrees, an electronic copy of the shipping document. Do not load any Dangerous Good unless you have this documentation.

A copy of any shipping document must be:

- Kept on file for two years after the date the shipping document or an electronic copy of it was prepared or given to a carrier by the consignor, for dangerous goods imported into Canada;
- Kept on file for two years after the date the consignor ensured that the carrier, on entry into Canada, had a shipping document or was given an electronic copy of one;
- Produced within 15 days after the day on which the consignor receives a written request from an inspector.

All documentation is kept on file at the head office in Alberta.

Loading and Containment

A Spongberg Enterprises Ltd worker must not handle, or offer to transport dangerous goods in a means of containment unless the means of containment is designed, constructed, filled, closed, secured and maintained so that under normal conditions of transport and handling, there will be no accidental release of dangerous goods that could endanger public safety.

All dangerous goods loads must be properly secured and contained in such a way to prevent, under normal conditions of transport, damage to the means of containment or to the means of transport that could lead to an accidental release of the dangerous goods.

Classification of the Dangerous Goods

Dangerous goods safety marks must be displayed on a truck containing dangerous goods for transport. Dangerous goods safety marks include labels, placards, orange panels, signs, marine pollutant marks, numbers, letters, abbreviations and words used to identify dangerous goods and to show the nature of the danger they pose. The safety mark must be displayed on the dangerous goods before transporting or importing any loads. Dangerous goods safety marks give a quick identification of dangerous goods in the event of an emergency situation such as an accident or an accidental release of from a means of containment.

Before allowing a carrier to take possession of dangerous goods for transport, the consignor must determine the classification of the dangerous goods. Do not load any Dangerous Good unless it is classified and has a proper safety mark.

Reporting of an Accidental Release

In the event of an accidental release of dangerous goods from containment, an employee who has possession of the dangerous goods at the time of the



accidental release must make an immediate report of the accidental release to appropriate provincial authority. All reasonable emergency measures to reduce or eliminate any danger to public safety that results or may reasonably be expected to result from the release must be your first priority.

Where an accidental release of dangerous goods in excess of a prescribed quantity or concentration occurs or is imminent from a means of containment being used to handle or transport dangerous goods, any person who at the time has the charge, management or control of the means of containment shall report the occurrence or imminence of the release to.

- The appropriate Alberta provincial authority at 1-800-272- 9600;
- **911** – this will notify the local police and the fire department
- Spongberg Enterprises Ltd head office and your direct supervisor;
- The consignor of the dangerous goods;
- The owner, lessee or charterer of the road vehicle;
- Infectious Substances, CANUTEC at (613) 996-6666; and
- Accidental release from a cylinder that has suffered a catastrophic failure, CANUTEC at (613) 996-6666.

If there is a release of a dangerous good the following information will be required for the report:

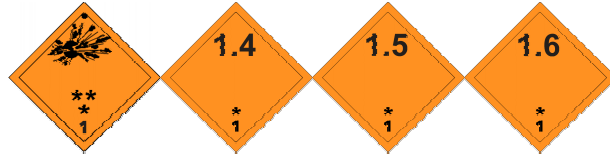
- Know the shipping name or UN number of the dangerous goods;
- Know the quantity of dangerous goods that was in the means of containment before the accidental release;
- Know the description of the condition of the means of containment from which the dangerous goods were released, including details as to whether the conditions of transport were normal when the means of containment failed;
- Know whether it was an accidental release from a cylinder that has suffered a catastrophic failure (explosion);
- Know the location of the accidental release;
- Know the number of deaths and injuries resulting from the dangerous goods release;
- Know the estimate of the number of people evacuated from private residences, public areas or public.

Write the information down as soon as you get a chance. Every person required to make a report shall, as soon as possible in the circumstances complete the report.



All Dangerous Goods fall into one of nine classes:

Class 1
explosives



Class 2
gases



Class 3
flammable liquids



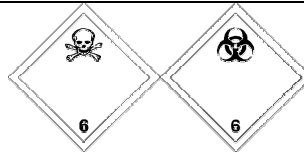
Class 4
flammable solids, spontaneously combustible and substances that, on contact with water, emit flammable gases



Class 5
oxidizing substances and organic peroxides



Class 6
poisonous (toxic) and infectious substances



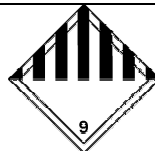
Class 7
radioactive materials



Class 8
corrosives



Class 9
- miscellaneous products or substances
- miscellaneous identified dangerous goods
- certain specified goods considered dangerous to the environment
- dangerous wastes





LIFTING AND HANDLING LOADS

Safe lifting is key to ensure the protection of the health and safety of every employee. Every feasible effort shall be made to provide a work environment that allows workers to maintain a healthy back. Spongberg Enterprises Ltd recognizes this and expects all workers to follow these procedures. This shall be accomplished by implementing acceptable engineering controls and work practice controls, where applicable.

Following these general safe practices will help all employees protect their back while lifting (this is a quick hazard assessment):

- Wherever possible, pack shipments so all containers are less than 20 kg.
- Size up or test a load before attempting to lift to see if you can handle it. Never attempt to lift an oversized or awkward load alone.
- Reduce oversized or awkward loads by splitting into smaller loads.
- Use mechanical equipment (dolly, crane, etc) to reduce the load.
- Make sure the route or path that you intend to take is clear.
- Use extreme caution when carrying items across uneven terrain, or up or down stairs.

Keep your back straight. Bend at your knees as far as you can and still be able to return to an upright position. Initiate the lift and come to an upright position with your leg and buttock muscles. Tighten your abdominal muscles to help brace your back as you lift. · Keep the object close to your body. Keep your head higher than your shoulders. · Grip with your whole hand – not just your fingers.

If an injury occurs

If a worker reports what the worker believes to be work related symptoms of a musculoskeletal injury, Spongberg Enterprises Ltd must promptly review the activities of that worker, and of other workers doing similar tasks, to identify work-related causes of the symptoms, if any, and take corrective measures to avoid further injuries if the causes of the symptoms are work related.



EMERGENCY RESPONSE PROCEDURES

Spongberg Enterprises Ltd has consulted with affected (all) workers in establishing this emergency response plan. When required, site-specific plans are developed with the assistance of everyone involved. This plan is re-evaluated annually, along with the rest of this manual to keep the information current. If a significant piece of information has been omitted, it will be posted in the lunchroom until the manual has been updated.

Spongberg Enterprises Ltd trains all workers in the emergency response plan during orientation. One or two office type drills occur every year and we are often included in our clients ERP drills.

It is essential that at least one person or vehicle on site be equipped with a cellular phone or radio to be used for communication with management, and also to enable personnel to call for assistance in the case of an emergency. Spongberg Enterprises Ltd employees will be trained and respond to any alarm by evacuating. You are never allowed to perform rescue since we are not trained in rescue.

The following steps must be taken following any **accident**. The order in which they are done can only be determined by the people who witness or arrive at the scene of the accident, and the prevailing conditions.

- Don't Panic
- The person encountering the accident should make a quick evaluation of the scene before disturbing anything or taking further actions.
- Determine if there are any hazards in the area that could harm themselves, other workers or cause further loss.
- Take immediate action to make the area safe.
- Call for assistance.
- Treat injured persons as soon as it can be safely done. Only move the victim if there is an imminent danger, such as fire, electrical hazards, or atmospheric contamination.
- Do not make any unnecessary changes to the scene of the accident. Record any changes that are made for accident investigation.
- Secure the surrounding area until authorities arrive.

Spongberg Enterprises Ltd provides emergency equipment including cell phone, first aid kits, fire extinguisher, field safety kit (including flares and bear spray). This equipment is located in all field vehicles, spare equipment is located in the storage room. The equipment for office is located in the kitchen and a shower is located in the washroom.



When in the Spongberg Enterprises Ltd office emergency facilities (hospitals, police, fire services) are nearby and contacted by calling 911. All field projects begin with the determination of where emergency facilities are located and estimated time of response. A transportation plan is developed and communicated to all workers.

Employees involved in any emergency involving any injury or illness, or damage to vehicle or equipment are required to report the incident on our Accident/Incident Report Form.

Fire Emergency Response Procedure

1. Remain calm!
2. Ensure all personnel are accounted for and out of danger.
3. If a minor fire, activate extinguishing facilities. DO NOT jeopardize personnel safety.
4. If a major fire, call nearest fire department or fire control team.
5. Take reasonable steps to minimize loss of equipment. Disconnect electrical equipment if it is on fire and only if it is safe to do so.
6. Do not break windows.
7. Do not open a hot door (before opening a door, touch it near the top. If it is hot or if smoke is visible, do not open).
8. Do not attempt to save possessions.
9. Meet in the park across the street (if at the office), if at a jobsite meet at the designated muster point.
10. Do not return to the affected area until told to by the fire department.
11. If a minor fire occurred, conduct an investigation and develop an incident report.

Natural Disasters: Severe Storms, Tornadoes, Lightning, Hail, etc.

In the event of a severe storm warning within the surrounding area:

1. Disconnect electrical equipment and appliances not required for emergency use.
2. Do not use the telephone except for an emergency or absolutely essential business.
3. Store drinking water in clean containers.
4. Avoid structures with wide roof spans (eg. shop, gymnasiums, etc).
5. Tornado warnings:
 - a. Go to a basement if possible, or an interior hallway.
 - b. Upper floors are unsafe. If there is no time to descend, go to a closet, a small room with strong walls, or an inside upper hallway.
 - c. Do Not remain inside a vehicle. As a last resort, and if no ditch or ravine is nearby, crawl under the vehicle.
 - d. If in open country and time permits, locate suitable shelter. If not, lie in the nearest ditch or ravine. Be alert for flash floods.



Overcome with H₂S

If a worker is overcome with H₂S, you must not go and rescue him without protecting yourself first by donning a breathing apparatus:

1. Get out of the H₂S area.
2. Call out or sound alarm.
3. Call for HELP.
4. Put on breathing apparatus.
5. Rescue victim; move them to fresh clean air.
6. Get air into their lungs by use of mouth-to-mouth.
7. Treat for shock, keep them warm and quiet. DO NOT let them walk around or go back to work.
8. Take them to the nearest hospital.

Bear Confrontations

Even though you follow all these precautions, you may still have an encounter with a bear. While there is no guaranteed method of dealing with a bear confrontation, some of the points that follow have proved useful:

1. **Leave the area:** if you see the bear from a distance take a wide detour or leave. If you cannot retreat, then wait for the bear to move from your path. Always leave the animal an escape route.
2. **Stay calm:** Acting in a calm and relaxed manner so as not to threaten the bear has proved most successful. Assess your situation and look for possible escape routes or safe trees.
3. **Move slowly:** slowly back up, and speak to the bear in a soft monotone voice. Screaming or sudden movements may provoke an attack. Never throw anything at a bear and do not try to run away. Bears can run about the same speed as a racehorse and have very fast reflexes.
4. **Monitor the bear for aggressive behavior:** the bear may snap its jaws and make a "woofing" sound. It may keep its head low and have its ears laid back. If the bear moves towards you consider this an aggressive act. Sometimes a bear will try to bluff its way out of a threatening situation by charging and then veering away at the last second. A bear that rears on its hind legs and waves its nose in the air is trying to identify you. Remain still and speak in low tones. If the bear does not display aggressive behavior, continue talking to it and back away slowly. Remember - never run!
5. **Look for a tree to climb:** if the bear is behaving aggressively, back slowly towards the tree. Carefully remove your pack or jacket and set it on the ground to distract the bear. Climb as high into the tree as you can. Although adult grizzlies rarely climb trees a large one can easily reach over 4 metres. Stay in the tree until you are sure the bear has left the area, then leave the area quickly. Be aware that black bears are good climbers and a tree might not afford an escape from them.



Rattlesnake Bite

In the event of an actual or probable bite from a rattlesnake, execute the following first aid measures without delay:

Snake:

Make sure that the responsible snake or snakes have been appropriately and safely contained, and are out of danger of inflicting any additional bites.

Transportation:

Immediately call for transportation. Meet the ambulance half way, only if driver has not been bitten.

Telephone: **911**

Victim:

Keep the victim calm and reassured. Allow him or her to lie flat and avoid as much movement as possible. If possible, allow the bitten limb to rest at a level lower than the victim's heart. Move the victim into the vehicle if you cannot secure the area. Treat the victim as if they were in shock.

Identify the bite site, looking for fang marks.

Immediately wrap a large constricting band snugly about the bitten limb at a level just above the bite site, ie. between the bite site and the heart. The constricting band should be as tight as one might bind a sprained ankle, but not so tight as to constrict blood flow.

You should always seek help immediately after a snake bite. You should also back away from the snake quickly, for some people have been bitten multiple times because they failed to give the snake enough of the space it wants. Try to keep warm and calm. To help with the pain, you can use a compression bandage applied very lightly.

DO NOT remove the constricting band until the victim has reached the hospital and is receiving Anti-venom.

DO NOT cut or incise the bite site.

DO NOT apply ice to the bite site.

DO NOT attempt to suck out the venom with your mouth!!!

Sucking the venom will only cross the venom over to the saliva and rendering things worst for yourself or the person doing this procedure to the victim. Some of



the symptoms are: swelling at the bite location, dizziness, nausea, numbness, difficulty in breathing, unconsciousness, and/or convulsions. If you're lucky, you'll have had a "dry" bite, which is when the snake bit you, but did not release any venom. As with any dangerous creatures, the best defence is to try to avoid the rattler all together.

Fatalities and Severe Injuries

FATALITY - You are REQUIRED to contact the OH&S Director of Inspection of the time, place and nature of the injury or accident at 1-866-415-8690 as soon as possible after calling for ambulance and securing the safety of all others.

If a fatality or severe injury (involving hospitalization) occurs all work must be stopped immediately. Important facts and evidence may be lost if work recommences prior to the completion of an investigation.



FIRST AID

Training

All field personnel are required to complete Standard First Aid Training put on by St. John Ambulance. On all daily toolbox safety meeting forms, list all designated first-aiders on site (update as new workers arrive).

Ten percent of the Spongberg Enterprises Ltd office staff are required to have current Standard First Aid Training. Management will determine who is required to have the training.

Transportation of Injured Workers

Prior to all new jobs starting the office will ensure arrangements are in place to transport injured or ill workers from the work site to the nearest health care facility. This will generally be done in a work vehicle. When working on remote sites STARS will be contacted.

First Aid Equipment

Depending on the task being preformed for Spongberg Enterprises Ltd, certain work situations may require more extensive first aid supplies than others. All employees should be aware of the required first aid gear needed to satisfy Health & Safety requirements for any given work task (Office or Field). First Aid equipment must be kept in a conspicuous location, maintained in a clean, dry and serviceable condition and readily available to all employees. The First Aid equipment is located in the lunchroom and in all vehicles in easily identifiable containers bearing the First Aid cross. As any items are removed they will be refilled at the first available time.

- **Office/Administrative Work**

The Spongberg Enterprises Ltd office is supplied with a No. 1 First Aid Kit, readily available and accessible to all office workers. The contents and quantities of items needed for a No. 1 First Aid Kit are specified in the below Table.

- **Field Work**

Any field worker working alone must be equipped with a Type P Emergency First Aid Kit, the contents and quantities of items are specified in the below Table and a cellular phone or other means of communication must be in their vehicles.

Employees working at a field site comprising 2-4 persons must be equipped with No. 2 First Aid kits and a cellular phone or other means of communication in their vehicles. At least one of the workers must be a hold a certificate in Standard First Aid (SFA). Worksites with 5-9 persons must have a No. 2 kit, cellular phone or



other means of communication, and at least 2 persons with SFA certificates and 3 blankets. The contents and quantities of items are needed for a No. 2 First Aid Kit are specified in the below Table.

Field First Aid kits or communication devices (including cellular phone or radio) will be supplied to field staff if not available/supplied at the vehicle/worksite.

Table 1: Minimum Quantities of Items need for Specified First Aid Kits

First Aid Kit Type (Minimum quantity)			Item Description
No.1	No.2	No.3	
10	10	5	Antiseptic cleaning towelettes, individually packaged
25	50	10	Sterile adhesive dressing, individually packaged
10	20	5	10 cm x 10 cm sterile gauze pads individually packaged
2	3	1	10 cm x 10 cm sterile compress dressings, with ties
2	3	-	15 cm x 15 cm sterile compress dressings, with ties
2	1	-	20 cm x 25 cm sterile abdominal dressing
2	2	-	Conform gauze bandages – 7.5 cm
3	4	1	Cotton triangular bandages
5	8	-	Safety pins – assorted sizes
1	1	-	Pair of scissors
1	1	-	Pair of tweezers
1	1	-	25 mm x 4.5 m roll of adhesive tape
1	2	-	Crepe tension bandages – 75 mm wide
1	1	-	Resuscitation barrier device with a one-way valve
4	6	1	Pairs of disposable surgical gloves
1	1	-	First aid instruction manual (condensed)
1	1	-	Inventory of kit contents
1	1	1	Waterproof waste bag
-	1	-	20 cm x 25 cm sterile abdominal dressing
-	1	-	Sterile, dry eye dressing

All injuries must be reported to supervisors no matter how minor. Any incident that requires use of first-aid or first-aid supplies should be reported and documented using the Incident/Accident form.

Spongborg Enterprises Ltd must keep a record of the circumstances of any injury or illness at the workplace and the treatment given in each case. Records of injuries are to be kept for a period of three (3) years. For this reason, first aid kits



are supplied with a first aid treatment record. The first aid attendant who administers first aid must enter in the register his family name and given name as well as those of the injured worker, the date, time and description of the injury or sickness and the type of first aid given.



CHEMICAL AND BIOLOGICAL HAZARDS

Spongberg Enterprises Ltd identifies the hazards associated with the chemical and biological exposures at a workplace. Workers have the potential of coming into contact with many different chemicals. These chemicals may cause short or long term detrimental affects on bodily systems if used in an unsafe manner or at levels exceeding legislation. It is essential that all Spongberg Enterprises Ltd workers read, understand, and comply with safe work practices and procedures in this policy.

The Alberta Occupational Health and Safety Code has set limits for the employer to ensure that a worker's exposure to chemical and biological hazards are kept as low as reasonably practicable, and does not exceed its occupational exposure limit found in Schedule 1, Table 2. When ever possible substances should be substituted with non-harmful chemicals. Controls including administrative, engineering, and Personal Protective Equipment are often employed to keep exposure to a minimum.

Training

The purpose of this policy is to keep workers safe and increase awareness for potential chemical and biological risks. All Spongberg Enterprises Ltd workers receive basic Chemical and Biological Substances training and Workplace Hazardous Materials Information System (WHMIS) training prior to going to the field. All workers must have the proper combination of experience, knowledge, and education to perform the work required.

All Spongberg Enterprises Ltd workers must read, understand, and comply with safe work practices and procedures arranged to control chemical and biological substances. If you do not understand how to work with a particular chemical, the supervisor can be asked or refer at the Material Safety Data Sheet (MSDS) for more information. MSDS sheets often include information including: Product Identification, Composition, Hazards Identification, First Aid Measures, Fire Fighting Measures, Handling and Storage, Exposure Controls/Personal Protection, Physical and Chemical Properties, Stability and Reactivity, Toxicological Information, Accidental Release Measures, Ecological Information, Disposal Considerations, and Other Information.

Health hazards, both short and long term are identified on the MSDS. For ceiling limits and exposure limits Alberta OHS legislation will need to be reviewed; keep in mind ceiling limits and exposure limits may be different in other provinces.

Worker Exposure

At Spongberg Enterprises Ltd there is the potential to encounter chemicals and biological hazards. No worker employed with Spongberg Enterprises Ltd will



exceed the Occupational Exposure limit, at any time, for any substance listed in Schedule 1, Table 2 of the OH&S Regulation.

When working around Chemicals proper personal protective equipment must be worn. Safety glasses or goggles, gloves, CSA chemical resistant Safety Boots, long sleeves and pants must always be worn, refer to the current MSDS Sheet for PPE requirements for each chemical.

At a minimum, whenever working around chemicals where there is the potential of those chemicals to splash/spill into the eyes or skin an eyewash station (kept in serviceable condition) must be present. When necessary, Spongberg Enterprises Ltd or the host Client will provide a deluge shower or emergency bath facilities. If a worker has been contaminated at a work site, the worker needs to immediately remove the soiled clothing and wash the contaminated area. The soiled clothing should be cleaned with water and soap before putting it back on (always have a change of clothing with you). The affected worker will report the contamination to his/her supervisor and will see a doctor if required.

Storage of Chemicals

All harmful substances used or stored at all Spongberg Enterprises Ltd worksites will be clearly identified and stored in a way that it is not hazardous to workers. All chemicals must be transported in their original container. Workplace and supplier labels are required on all chemical containers. Any label that has fallen off or has become unreadable will immediately be replaced with the correct WHMIS label or discarded accordingly using the MSDS.

Chemical Used at Spongberg Enterprises Ltd

Chemicals and Biological Hazards are a part of our every day life. They have the potential to cause harm with just one exposure or over many years. Our goal is to ensure all workers are knowledgeable and competent to deal with any chemicals they may encounter both safely and environmentally responsibly. Prior to working around any new chemical you must review the MSDS. Even common chemicals should have their MSDS reviewed periodically.

The following chemicals that are used at Spongberg Enterprises Ltd:

- Produced Water
- Petroleum Distillates
- Glycol
- Methanol
- Cleaning Supplies
- Hydrogen Sulfide (H₂S)
- Diesel
- Gasoline
- Human Blood or sharps



Safe Work Procedure for Chemicals

Each chemical will have a different safe work procedure. Refer to the MSDS. A copy of a current (3 years old or newer) must be kept in a vehicle that is accessible during the use of the chemical.



HYDROGEN SULPHIDE (H₂S)

When H₂S is present or has a potential presence, all OH&S regulations, as well as H₂S training procedures, must be strictly adhered to.

Hydrogen Sulphide, commonly called H₂S (Sour Gas), is highly poisonous gas and is a killer in high concentration. H₂S can be found near sour wells, sewers, plant sites, sour tanks, and any well being drilled (unknown H₂S content). A properly maintained H₂S meter must be worn at any site where H₂S is known to exist or may potentially be encountered. If you do not know if you are going into a sour area be prepared...wear an H₂S meter and ensure contact is maintained on a regular basis with someone who can help in an emergency. Emergency contacts can include fellow workers in the area, and client operators, if these are not available ensure regular contact with the Spongberg Enterprises Ltd office. If you are working alone make sure your contact is aware that you are in a sour area.

Since we do not use Hydrogen Sulphide as a pure substance in an amount exceeding 10kg or a mixture where the amount is >0.1% by weight and an amount exceeding 10kg we are NOT required to have a code of practice. If our work scope ever involves working with high concentrations a code of practice will be developed.

Hydrogen Sulphide properties are:

Colour	-Colourless
Odor	-A smell similar to rotten eggs
Density	-Heavier than air (1.189)
Explosive	-Mixed with the right proportion of air of oxygen, H ₂ S is explosive (40%-46%)
Flammability	-H ₂ S will ignite at 260 ⁰ C and burn readily with a blue flame, producing Sulphur Dioxide, another unpleasant gas that will irritate the eyes and lungs.
Solubility	-H ₂ S can be dissolved in fluids. If the fluid's temperature increases or becomes agitated, H ₂ S will be released.
Boiling Point	-Is -60 ⁰ C, so we would likely find H ₂ S as a gas instead of a liquid.

Minimum Exposure

When the amount of H₂S in the environment is 10 ppm or less, the worker can function for eight (8) hours without significant side effects. This is called the Occupational Exposure Limit (OEL).

Maximum Exposure

When the amount of H₂S in the environment is 15 ppm or higher, a breathing apparatus must be worn if the work has to be done in that area. This is called Ceiling Limit.



The following are limits you should be aware of:

10 ppm	.001% Occupational Exposure Limit (OEL) for 8 hours
100 ppm	.01% will kill the sense of smell within 3 to 15 minutes
200 ppm	.02% loss of smell rapidly and will burn the eyes and throat
500 ppm	.05% loss of reasoning and balance; breathing will stop within 15 minutes or less
700 ppm	.07% unconscious very quickly, breathing will stop, and the result will be death if not rescued promptly
1,000 ppm	.1% unconsciousness immediately results; will have permanent brain damage or death, if not rescued promptly
10,000 ppm	1% may result in death at once, if not rescued promptly

When you encounter H₂S or suspect the presence of H₂S:

1. Get out of the area by moving upwind and/or uphill, away from the source.
2. Call out or sound alarm. Let everyone know that there is H₂S in that area.
3. Tell your Supervisor and notify client representative.
4. Do not go back to that area without a breathing apparatus (if available) and another worker with breathing apparatus that stays in a clean air environment for back-up.

If a worker is overcome with H₂S, you must not go and rescue him without protecting yourself first by donning a breathing apparatus:

1. Get out of the H₂S area.
2. Call out or sound alarm.
3. Call for HELP.
4. Put on breathing apparatus.
5. Rescue victim; move them to fresh clean air.
6. Get air into their lungs by use of mouth-to-mouth.
7. Treat for shock, keep them warm and quiet. DO NOT let them walk around or go back to work.
8. Take them to the nearest hospital.

The following precautions should be strictly observed when H₂S is known to be or suspected of being present as part of the normal working environment:

- Maximum care should be taken to prevent the escape of Hydrogen Sulphide into air surrounding any work area.
- Adequate ventilation should be provided.
- Before entering any area suspected of containing Hydrogen Sulphide, determine whether or not the gas is present.
- Never enter an area suspected of Hydrogen Sulphide without proper protective breathing apparatus and employing the "Buddy System".

Ensure that all employees, who are to work in areas where Hydrogen Sulphide gas may be encountered, have reviewed the comprehensive instructions as to the dangers of the gas and how to properly use the breathing apparatus.



Spongberg Enterprises Ltd requires that all personnel working in H₂S or H₂S potential areas have a current H₂S Alive training course (renewed every **three years**).



MANAGING THE CONTROL OF HAZARDOUS ENERGY (LOCK-OUT – TAG-OUT)

The purpose of the Managing the Control of Hazardous Energy policy is to protect and educate employees and contractors. It is essential that all Spongberg Enterprises Ltd workers read, understand, and comply with the following procedures for Managing the Control of Hazardous Energy.

Training and Competency

All employees who may be required to work in or around any lockout procedure must take in-house training to become familiar with the Spongberg Enterprises Ltd policy. All Spongberg Enterprises Ltd workers must have the proper combination of experience, knowledge, and education to perform the work required.

All field and shop employees are required to participate in Lockout-Tagout Awareness training during orientation and as needed after that.

Workers must be competent when working around any equipment that must be locked out. A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

All training documents are kept on file and this is verified prior to each worker being sent to the field to complete a task that may involve using our lockout procedures.

Standards for Locks and Tags

Spongberg Enterprises Ltd uses locks and tags that have unique marks or tags with the following information on it:

- The name of the worker (or an identifying picture) that has locked out the machinery, equipment, or powered mobile equipment. Note: that each individual will put their own individual tag onto the machinery, equipment, or powered mobile equipment.
- The date.
- Reason for locking out the equipment.
- Estimated time of completion.

All workers who have installed a lock or tag must be readily available during the time the equipment is locked out.



General Procedure

A hazard assessment must be completed prior work starting that addresses all hazards and protects personnel directly related to the lockout procedure and those in the vicinity of the work. All site-specific procedures must be documented.

The manufacturer's specifications will be reviewed, if practical, when developing and implementing procedures and controls for a work processes. Some equipment must stay running to service, repair, or clean; the procedure in the manufacturer's specifications must be adhered to. If there are no manufacturer's guidelines, a task specific procedure must be developed.

Before servicing, repairing, testing or adjusting of machinery, equipment, or powered mobile equipment the Spongberg Enterprises Ltd worker must ensure that the machinery, equipment, or powered mobile equipment has come to a complete stop.

Notification of Isolation

The machinery, equipment, or powered mobile equipment must be locked or tagged to show that it is being worked on (see above for lock and tag standards).

Verification of Isolation

Work is not to be performed on equipment to be serviced, repaired or adjusted until the equipment is tested to ensure that it is inoperative and the worker is assured that it is inoperative and effectively isolated.

Removing Lock or Tag and Returning Equipment to Service

A Spongberg Enterprises Ltd employee must not remove a lock from a locked out piece of equipment unless the person is the worker who installed it and the worker ensures that no workers will be in danger if it is removed. If the Spongberg Enterprises Ltd worker who installed a lock is not available a shift supervisor must remove the lock.

Securing devices must not be removed until each involved worker is accounted for, any personal locks placed by workers are removed, and procedures are implemented to verify that no worker is in danger before a worker removes the securing devices and the machinery, equipment, powered mobile equipment, piping, pipeline or process system is returned to operation.

Group Procedure Lockout

If there is more than one worker working on the machinery, equipment or powered mobile equipment to be locked out, then the group lockout procedure must be followed. All employees (that are involved in the lockout) must put their individual lock or tag on the equipment. The machinery, equipment or powered mobile equipment must not be turned on until the last lock is removed from the machinery, equipment or powered mobile equipment.



Emergency Procedure

In an emergency or if the worker who installed the lock is not available, the shift supervisor may remove the lock only after verifying that no worker will be in danger due to the removal.

Isolating Pipes and Pipelines

When there are harmful substances under pressure in a piping system the two methods to isolate that system is by blanking or blinding, or a double block and bleed isolation system. An operable bleed-off between the two seals must also be utilized to release the build up pressure and render the equipment safe.

Pigging

A general definition of pigging is the propulsion through a pipe of a mobile plug (pig) that can execute certain activities inside the pipe. Examples and reasons for pigging include: clean a pipe mechanically (pig with brushes), to check a channel (pig with video camera), or to inspect the pipe and welds (pig with eddy current sensors or ultrasonic technology).

When performing pigging and testing:

- Only use properly designed pig senders, receivers and test heads.
- Position warning signs on each end of line to identify the “Critical” area.
- Check that adequate test heads are being used and properly installed.
- Fabricate and install test heads, temporary pig launchers and receivers, if required.
- Ensure that a proper pig is being used.
- Position air compressor.
- Ensure that the pig catcher on a pipeline is isolated from the pipeline and depressurized before the pig is removed.
- Ensure no workers are at the end of the pipe or in the immediate vicinity of the pig catcher if the pipe or pig catcher is under pressure during pigging and testing.
- Ensure only personnel involved with operations are on site.
- Adhere to P.P.E. Policy including Hearing Protection

When around pigging:

When workers are not directly concerned with the pigging and testing operation they must not be in the immediate area of exposed piping during the operation.



NOISE

The purpose of this noise policy is to protect all Spongberg Enterprises Ltd employees and contractors from occupationally induced hearing loss, increase worker noise awareness, and to reduce noise exposure using engineering and administrative controls, as much as possible. It is essential that all Spongberg Enterprises Ltd workers read, understand, and comply with safe work practices and procedures for this noise policy.

When ever possible work must be completed as far as reasonably practicable from any noise sources. Our purchasing policy allows for the purchase of tools and equipment that are inherently less noisy.

The Alberta Occupational Health and Safety Code has set limits to ensure that a worker's exposure to noise does not exceed the noise exposure limits in Schedule 3, Table 1, and 85 dBA L_{ex} .

Noise Exposure Assessments

Spongberg Enterprises Ltd conducts noise exposure assessments if there is a possibility that noise levels will exceed our action level of 82 dBA. If our work is not the cause of the noise and other workers or the host facility has already completed a noise exposure assessment you are require to abide by all signage and Client specific training. If a noise exposure assessment has confirmed that workers at Spongberg Enterprises Ltd are exposed to noise over 85 dBA then a site specific noise management program that includes policies and procedures will be developed and implemented. If the noise assessment identifies any area to be over 85 dBA then warning signs will be posted outside of each of these areas.

Hearing Conservation

Often it is impracticable to apply engineering and administrative controls to reduce the noise levels. Hearing protection is recommended in addition to any other controls to reduce the level of noise reaching your inner ear.

During orientation all workers are provided with training in the selection, use and maintenance of hearing protection equipment required to be used at a work site. The hearing protection will be in accordance with the CSA Standard Z94.2-02 Hearing Protection Devices-Performance, Selection, Care, and Use and manufacturer's specifications.

Use your judgement, if signs are posted or it is difficult to communicate within 3 feet of another person you must use your hearing protection.



OIL AND GAS WELLS - DRILLING

The purpose of the Oil and Gas Wells- Drilling policy is to protect and educate employees and contractors. It is essential that all Spongberg Enterprises Ltd workers read, understand, and comply with the safe work practices and procedures for Oil and Gas Wells- Drilling.

Training and Competency

All Spongberg Enterprises Ltd workers receive training at orientation and on an ongoing basis.

Spongberg Enterprises Ltd ensures a competent supervisor always supervises exploration, drilling, servicing, snubbing, testing, or production operations. A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

The supervisor must be competent in all the following procedures:

- Safe work practices - including the safe operation of a rig at the work site.
- The safe handling, use and storage of hazardous substances. Knowledge of WHMIS.
- Well control and blow out prevention.
- Detecting and controlling worker exposure to hydrogen sulphide.
- Handling, using, maintaining and storing personal protective equipment.
- Appropriate responses to emergencies at the work site.
- The duties and responsibilities of all workers supervised by the Supervisor.

Inspections

All of Spongberg Enterprises Ltd drilling rigs, service rigs, or snubbing units are inspected by a competent worker before it is placed into service, and every 30th days on which it is used for as long as it is in service. The inspection must be done on the Spongberg Enterprises Ltd Inspection Form. All inspections and repairs on a derrick or mast are recorded in the Canadian Association of Oilwell Drilling Contractors (CAODC) Logbook. No work will begin until it is verified inspections have been completed and all workers have been informed of the results.

A copy of all inspection reports are kept at the work site where the drilling rig, service rig, or snubbing unit is in service, and at the employer's principal place of business in Alberta and for at least one year from the day of inspection. The inspections and logbook must be available at the work site for review by an OH&S officer or the Energy Resources Conservation Board (ERCB).



Breathing Equipment

If the hazard assessment has indicated that at any time (including emergency response activities) the worker may be exposed to a harmful substance in excess of its occupational exposure limit, sufficient self-contained breathing apparatus units will be available.

If there is only one worker at the well site, they are not permitted to do any tasks where they may be exposed to a harmful substance in excess of its occupational exposure limit. Two people should always be on-site during work that will or may expose any worker to a harmful substance in excess of its occupational exposure limit. Our Working Alone procedures ensure only low hazard tasks may be performed alone.

Specific Hazards

Rig Tank or Pit Enclosures

A rig tank or pit used for the circulation of drilling fluids containing flammable or combustible material must be protected from sources of ignition and properly vented. Any vented vapours must be directed away from ignition sources.

Pipe Rack

All fluids from standing drill pipes, drill collars and tubing racked in a derrick must be drained before they are racked in a derrick or mast. Once racked drill pipes, drill collars and tubing must be secured to prevent them from falling out of or across the derrick or mast.

If a trailer is used as a pipe rack it must have guardrails and toe boards along the full length of both sides of the trailer, a stairway at the end farthest from the drilling or service rig floor, and be constructed so that the lower end of the pipe does not roll off the trailer when the pipe is hoisted into the derrick.

Rotary Table

All danger zones on Spongberg Enterprises Ltd equipment is established and clearly marked around a rotary table used in a drilling operation. While the table is in motion workers must not enter the danger zone or allow other equipment or loose materials to enter the danger zone.

Emergency Escape Routes

All access/egress locations are visually inspected by a competent worker at least once a week. All drilling platforms have a primary exit and emergency exit (in case the primary exit is blocked or otherwise compromised). These areas must be kept free of obstructions at all times.

Fuel Storage

Fuel must be stored 25 meters from any well.



The only exception is diesel fuel that is used as fuel for machinery operating at a wellsite. This diesel fuel must be kept in a fully enclosed storage container, be no larger than 8000 litres, and kept a minimum of 7m from the well.

All fuel must be stored in proper container and WHMIS labeled.



RESPIRATORY PROTECTION

The purpose of this Code of Practice is to protect and educate employees and contractors. It is essential that all Spongberg Enterprises Ltd workers read, understand, and comply with these safe work practices and procedures for Respiratory - Personal Protective Equipment.

Training and Competency

For PPE to be effective, workers must be trained in its correct use, care, limitations and assigned maintenance. Wearing and using respiratory protection does not eliminate the hazard. If the respiratory protection equipment fails, you will be exposed to the hazard. Respiratory protection must not be altered or removed even if it is uncomfortable.

All Spongberg Enterprises Ltd workers receive in-house training prior to wearing respiratory protection at a location. During the training the following items will be addressed:

- Description of different types of respiratory protection, and why the certain respiratory protective equipment is chosen for different tasks.
- Description of toxic, flammable, low oxygen etc. environments,
- General Hazards,
- Instruction on the use and care of the respiratory protective equipment,
- Information about the airborne contaminants, including potential health effects and warning properties,
- Limits of protection,
- Pre use and periodic inspections,
- Maintenance and cleaning,
- Instructions on proper donning and doffing of equipment,
- Procedures for emergency response, and
- Instructions on fit testing.

The training session includes a one on one determination of whether the worker has a physical or mental condition that prevents the ability to use the equipment properly. If it is determined the person is unable to wear respiratory protection alternate job tasks will be assigned. All employees will require a medical prior to using respiratory protective equipment. If the employee has a problem with claustrophobia he/she will be unable to wear the respiratory equipment.

Workers must be competent when working with respirators. A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision. All workers must have the proper combination of experience, knowledge, and education to perform the work required.



Training and retraining requirements are reviewed periodically and/or whenever there are changes in the products used or the processes involved.

Awareness training in respiratory protection is given to all field employees through Enform during the H₂S Alive course, updated every 3 years.

All training documents must be on file.

Respiratory Equipment

All Spongberg Enterprises Ltd owned respiratory protective equipment is approved by NIOSH. We do not permit employee owned equipment to be used on our worksites. The CSA Z94.4-02, Selection, Use and Care of Respirators requirement is followed by all workers.

Respiratory protective equipment must always be stored in a readily accessible location and in a manner that prevents its contamination. It is maintained in clean and sanitary condition, inspected before and after use, and serviced properly.

The appropriate respiratory protective equipment to protect the worker from the identified hazards must be used. This equipment will be available at the work site when the potential requirement exists.

Code of Practice

Prior to beginning work, all specific hazards that would or may require respiratory protection must be identified. A hazard assessment must take into account any hazardous items in the workplace including:

- Airborne contaminants;
- Biological contaminants;
- Dust;
- Fumes;
- Gas;
- Mist;
- Aerosol;
- Smoke;
- Vapor.

These hazards can cause an atmosphere to contain less than 19.5% or more than 23% by volume of oxygen, elevated levels of toxic chemicals or increased particulate matter.

Methods of Control

The following methods to ensure a safe atmosphere should be looked at before the decision to use respiratory protection is made:



- **Elimination** means to remove the toxic hazard from the workplace. This is the most difficult method of control.
- Consider **Engineering** methods such as local exhaust ventilation, addition of clean air to oxygen-deficient spaces, enclosure of a process producing the airborne contaminant, substitution of a less hazardous material, modifications to plants, equipment, ventilation systems, and processes that reduce the source of exposure.
- If engineering methods cannot be used then **administrative** procedures such as safe work procedures may be used when air contaminants are present. Alter the way the work is done, including timing of work, policies and other rules, and **work practices** such as standards and operating procedures (including training, housekeeping, equipment maintenance, and personal hygiene practices).

Often a combination of the above methods, along with Respiratory Protection is the safest control.

Determination Process

A hazard assessment to determine the degree of danger to a worker at a work site and whether the worker needs to wear respiratory protective equipment must be performed. The determination process assesses the nature of the contaminants, the concentration or likely concentration of any airborne contaminants, the duration or likely duration of the workers exposure, the toxicity of the contaminants, the concentration of oxygen, the warning properties of the contaminates and the need for emergency escape. Respiratory protection must be worn if a worker is or may be exposed to an airborne contaminant or a mixture of airborne contaminants in a concentration exceeding their occupational exposure limits or the atmosphere has or may have an oxygen concentration of less than 19.5% by volume or more than 23 % by volume.

It is better to wear respiratory equipment that protects more than you need, than not enough.

Selecting the Proper Respiratory Protective Equipment for the Job

The most appropriate respiratory protective equipment for the hazards present will be used. A respirator must be selected based on the following two conditions. One type is for conditions that may be Immediately Dangerous to Life or Health (IDLH). The other category is for non-IDLH.

IDLH

If it is determined that breathing conditions at a work site are or may become immediately dangerous to life or health all workers must wear self-contained breathing apparatus or an air line respirator that meets regulations. An oxygen-deficient or highly toxic (ei. H₂S at unknown concentrations) atmosphere are



considered IDLH. No exceptions to wearing self-contained breathing apparatus or an air line respirator are allowed.

Non-IDLH

The following factors determine the choice of respiratory protective equipment for non-IDLH situations. These factors need to be reassessed with every location, product, or process change.

- Identification of airborne contaminant(s). The potential contaminants need to be known - so the most appropriate filter is selected.
- Concentration of airborne contaminant(s). The average workday concentration and the highest short-term concentrations should be determined. Occupational Exposure Limits (OELs) should also be determined.
- Oxygen deficiency. This situation arises when the air has a reduced oxygen content that is hazardous to health, but is not IDLH. An atmosphere-supplying respirator must be used.
- Physical form. Identify all the physical forms that may be present including dust, mist, fumes, fiber, gas, vapor, etc.
- Length of time during which the respirator will be needed. Certain types are effective for longer periods of time than others.
- Toxic properties. By recognizing the full hazard, a full-face piece rather than a half mask respirator should be chosen for protection against eye irritants.
- Warning properties. If workers are aware of a substance and they detect a smell or their nose, eyes or throat become irritated, they will be aware that there is a poor fit of the mask or that the cartridges are exhausted.

Fit Testing

All employees must be clean-shaven and fit tested (both quantitative and qualitative) before they are approved by Spongberg Enterprises Ltd to use a respirator. Respiratory protective equipment depends on an effective facial seal for its safe use. The CSA requirements Z94.4-02 Selection, Use and Care of Respirators is used and trained during the fit test procedure.

Proper fit testing and equipment selection must take into consideration hot, cold, or confined working conditions. If the worker wears glasses alternative equipment may be required. If a satisfactory fit cannot be achieved, a different type of respirator must be used.

A negative and positive check must be completed prior to each use of respiratory protection.

Maintenance of Respiratory Protective Equipment

Respiratory Protective Equipment must be inspected for damage or deterioration, and cleaned according to manufacturer's instructions after each use.



- If more than one person might be using a respirator, it must be sanitized between uses.
- Cartridges and canisters that are near the end of their service life require replacement.
- Worn or damaged valves, straps and other parts should be replaced exactly as specified by the manufacturer. Repairs on self-contained breathing apparatus must only be done by persons trained and certified by the manufacturer.
- Equipment should be stored in ready-to-use condition in a clean and dry location.
- Disposable respiratory equipment should be disposed of after use according to manufacturer's instructions.

Emergency Respiratory Equipment

Respiratory protective equipment that is not used routinely but is kept for emergency use is inspected at least once every calendar month by a competent worker to ensure it is in satisfactory working condition.

Quality of Breathing Air

All air used in a self-contained breathing apparatus or airline meets the requirements of Table 1 of CSA Standard Z180.1-00, does not contain any substance in a concentration that exceeds 10 percent of its occupational exposure limits.

Enforcement for Not Wearing Respiratory Equipment

All Spongberg Enterprises Ltd workers must use the appropriate respiratory equipment provided. If the worker does not wear the Respiratory Equipment they may be subject to disciplinary actions. If you have a reason that you cannot wear respiratory equipment that day, please notify your supervisor immediately.



TRANSPORTATION - ALBERTA

The purpose of this policy is to protect and educate employees and contractors. It is essential that all Spongberg Enterprises Ltd workers read, understand, and comply with these safe work practices and procedures.

Training and Competency

All Spongberg Enterprises Ltd workers must have the proper combination of experience, knowledge, and education to perform the work required. All drivers must prove the proper license for the vehicle they are in control of.

Workers must be competent when driving for Spongberg Enterprises Ltd. A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

All training documents are kept on file.

Driver Records

Each Spongberg Enterprises Ltd driver has supplied the following information for his or her drivers file:

- The driver's completed application form for employment with the registered owner;
- A copy of the driver's abstract in a form satisfactory to the Registrar when the driver is first hired or employed, dated within 30 days of the date of employment or hire;
- Annual updated copies of the driver's abstract in a form satisfactory to the Registrar;
- The driver's employment history for the 3 years immediately preceding the time the driver started working for the carrier;
- A record of the driver's convictions of safety laws in the current year and in each of the 4 preceding years;
- A record of any administrative penalty imposed on the driver under safety laws;
- A record of all collisions involving a motor vehicle operated by the driver that are required to be reported to a peace officer under any enactment of Alberta or a jurisdiction outside Alberta;
- A record of all training undertaken by a driver related to the operation of a commercial vehicle and compliance with safety laws;
- A copy of any training certificate issued to the driver, in electronic or paper form, for the period starting on the date the training certificate is issued and continuing until 2 years after it expires, in accordance with Part 6 of the *Transportation of Dangerous Goods Regulations* under the *Transportation of Dangerous Goods Act, 1992 (Canada)*;



- A copy of a current medical certificate for the driver.

The information above is kept at the Spongberg Enterprises Ltd head office.

Inspections and Defect Reporting

All Spongberg Enterprises Ltd drivers will inspect his or her vehicle prior to operating it (at the beginning of each workshift) and after he ceases to operate it at the end of a workshift. Inspection are recorded on the Spongberg Enterprises Ltd Pre and Post Trip Inspection Form and include an inspection of the following equipment:

- The lighting devices and reflectors,
- The tires,
- The coupling devices,
- The wheels and rims,
- The service brake, including the trailer brake connections,
- The parking brake,
- The steering mechanism,
- The horn,
- The windshield wipers,
- The rear vision mirrors, and
- The emergency equipment.

Any defects will be recorded on the Spongberg Enterprises Ltd Pre and Post Trip Inspection Form. If the defect is such that it affects the safe operation of the vehicle the driver must immediately notify Spongberg Enterprises Ltd to repair or otherwise modify the vehicle, or cause it to be repaired or modified.

Security of Loads

Spongberg Enterprises Ltd equips all vehicles appropriately to allow for proper securement of all loads. All personnel must ensure that cargo transported by a commercial vehicle is contained, immobilized or secured so that it cannot leak, spill, blow off, fall from, fall through or otherwise be dislodged from the vehicle, or shift upon or within the vehicle to such an extent that the vehicle's stability or maneuverability is adversely affected. The security of a load must be periodically checked to ensure it stays secure.

Any property transported inside of the cab must be secured or stored to prevent risk of injury to the driver or any passenger by its falling, displacement, or other movement.

Hours of Service and Documentation

No driver is permitted to drive if the driver has accumulated 13 hours of driving time in a day. No driver is permitted to drive and no driver will drive after the driver has accumulated 15 hours of on-duty time in a day.



Requirement to Fill Out a Daily Log

Accurate and legible records must be kept in the Log Book showing, for each day the following:

- The driver's duty status,
- Elected cycle,
- Hour at which each duty status begins and ends, and,
- The total number of hours spent in each status.

The driver must maintain a duplicate of the above records for a period of at least 6 months from the date that the information is recorded in the daily log in a neat and orderly manner at the residence of the driver. If requested by a Peace Officer all drivers will, within 7 days, produce the duplicate of the daily logs to the peace officer for inspection.

Retention of Records

Spongberg Enterprises Ltd keeps a copy of all records including logbooks, drivers files, inspections, defect reports for at least 5 years from the date they are created, established or received. All records are kept in a secure (locked) cabinet and have been checked for legibility.



VIOLENCE PREVENTION IN THE WORKPLACE POLICY

The management of Spongberg Enterprises Ltd recognizes the potential for workplace violence and other aggressive behaviour directed at our employees. We will not tolerate behaviour from anyone that intimidates, threatens, harasses, abuses, injuries or otherwise victimizes our employees and will take whatever steps are appropriate to protect our employees from potential hazards associated with workplace violence. We are committed to providing our employees with an appropriate level of protection from the hazards associated with workplace violence.

Management Responsibilities

Spongberg Enterprises Ltd Management will:

- Inform employees if they are working in an area where there is a potential for violence and identify any risks that are specific to that area.
- Ensure that appropriate procedures are in place to minimize the risk to our employees from violence.
- Ensure that employees are trained in recognizing and responding to situations involving workplace violence.
- Ensure that every reported incident of workplace violence is investigated and potential areas for improvement are identified.

Employees Responsibilities

- Employees of Spongberg Enterprises Ltd are required to be familiar with and follow the procedures that are in place to protect them from workplace violence.
- All employees must participate in the instruction of workplace violence prevention.
- Employees are required to immediately report all incidents of workplace violence to their supervisor.
- Employees are also responsible for participating in work site hazard assessments and implementing controls and procedures to eliminate or control the associated hazards.
- No employee can be penalized, reprimanded, or in any way criticized when acting in good faith while following the procedures for addressing situations involving workplace violence.

WORKPLACE VIOLENCE DEFINED

Workplace violence entails a broad scope of activities. It is any act in which a person is abused, threatened, intimidated or assaulted in his or her employment. Workplace violence includes:



- Verbal abuse – condescending connotation in language, swearing or insults
- Verbal or written threats – any expression of an intent to inflict harm
- Physical attacks – kicking, shoving, pushing or hitting
- Threatening behaviour – destroying property, throwing objects or shaking fists.
- Harassment – any behaviour that demeans, embarrasses, humiliates, annoys, alarms or verbally abuses a person and that is known or would be expected to be unwelcome. This includes words, gestures, intimidation, bullying, or other inappropriate activities.

Examples of workplace violence include but are not limited to, rumours, pranks, escalated arguments, vandalism, sabotage, theft, physical assault, psychological trauma, anger-related incidents, rape, arson, and murder.

Workplace violence can not only occur in the traditional workplace such as the office and jobsites but also at work related functions such as conferences and social events related to work.

Spongberg Enterprises Ltd believes that all our employees have the right to work in an environment free from all forms of harassment. Harassment is defined as any objectionable conduct, comment, or display by a person that:

1. Is directed to any employee
2. Is made on the basis of race, creed, religion, colour, sex, sexual orientation, marital status, disability, physical size or weight, age, nationality, ancestry, or place of origin.
3. Constitutes a threat to the health and safety of the employee.

Spongberg Enterprises Ltd will make every effort to ensure that no employee is subjected to Harassment at any of our places of employment. Our management is committed to keeping this policy and to see that no employee causes or participates in the harassment of another employee.

Procedures

Field:

- There is a possibility of violence from a landowner, Client, co-worker, or a third party. In case of any threatening situation or concern that a threatening situation is arising, leave the area. Report the situation to the office by phone. A decision will be made whether to report the incident to the police.

In case of a threat being made, leave the area at once and call 911 and report the incident. Also notify the office as soon as possible.



- If working on a customer's plant site, workplace violence could occur on the part of an angry plant worker(s) or other contractors on the site. In case of any threatening situation or concern that a threatening situation is arising, leave the area. Report the situation to the office by phone. Spongberg Enterprises Ltd will then contact the client(s) management. In the case of a threat being made, leave the area at once and call 911 to report the incident. Also notify the office as soon as possible.

If physical violence occurs in any of the above situations, leave the area at once and call 911 for assistance. Call the clients local contact person and then advise the Spongberg Enterprises Ltd office of the situation.

- ***How potential hazards will be identified and communicated to staff***

Hazard assessments on workplace violence will be completed on an annual basis or when a new issue arises. Results of the assessment will be conveyed to the employees at the regular staff meetings.

- ***How to respond to workplace violence***

All workers that are exposed to potential or real situations of workplace violence should leave the area immediately and call for assistance from co-workers or 911 immediately.

- ***How to investigate and document incidents of workplace violence***

All incidents of workplace violence will be documented on the Incident Report and Investigation Form and the supervisor is responsible for investigating the incident to determine the causes and to identify how to prevent future occurrences.

- ***The support available for victims of workplace violence***

All workers who are exposed to workplace violence will be advised to consult with a health care professional for treatment.

- ***Training of workers***

All workers will be instructed on workplace violence policy and procedures in orientation. A review will be done annually or as new hazards arise.

SEL Ladder Safety Guidelines (Page L1)

1. You must ensure that a ladder used during the servicing of energized or potentially energized electrical equipment is made of non- conductive material
2. You must ensure that a ladder used during the servicing of energized or potentially energized electrical equipment is made of non- conductive material
3. You must not perform work from either of the top two rungs, steps, or cleats of a portable ladder unless the manufacturer's specifications allow the worker to do so.
4. You must ensure that a portable ladder meets the requirements of CSA Standard CAN3-Z11-M81 (R2005), Portable Ladders. The applicable ANSI Standard is also acceptable (see Part 8, Section 135 of the OHS Code for details).
5. You must ensure that a portable ladder is secured against movement and placed on a base that is stable.
6. You must ensure that the base of an inclined portable ladder is no further from the base of the wall or structure than one quarter of the distance between the base of the ladder and the place where the ladder contacts the wall.
7. You must ensure that the side rails of a portable ladder extend at least 1 metre above a platform, landing, or parapet if the ladder is used as a means of access to the platform, landing, or parapet.



SEL Material handling Guidelines (Page MH1)

1. Before you manually lift, lowers, push, pull, carry, handle, or transport a load that could injure you, you must perform a hazard assessment that considers: (a) the weight of the load, (b) the size of the load, (c) the shape of the load, (d) the number of times the load will be moved, and (e) the manner in which the load will be moved.
2. Spongberg Enterprises Ltd. must provide, where reasonably practicable, appropriate equipment for lifting, lowering, pushing, pulling, carrying, handling, or transporting heavy or awkward loads.
3. Spongberg Enterprises Ltd. must ensure that a worker who may be exposed to the possibility of musculoskeletal injury is trained in specific measures to eliminate or reduce that possibility. SEL must ensure that the training includes: (a) identification of factors that could lead to a musculoskeletal injury, (b) the early signs and symptoms of musculoskeletal injury and their potential health effects, and (c) preventive measures including, where applicable, the use of altered work procedures, mechanical aids, and personal protective equipment.



SEL General Waste Management Guidelines (Page GWM1)

1. Workers must estimate the waste that will be generated prior to work being performed so that the need for containers and waste removal, if necessary, can be determined.
2. Workers must coordinate with the project site or owner to ensure proper disposal of wastes or scrap materials. For example, the contractor must ensure the owner is aware of whether wastes and scrap materials will be taken off site by the contractor or will be disposed of on the owner's site.
3. Dispatch must assign person(s) accountable for disposition of wastes generated at the work site.
4. Workers must use PPE to protect themselves during handling of waste, scrap, or leftover materials.
5. Dispatch must ensure that project related wastes are stored and maintained in an organized fashion to encourage proper disposal and minimize risks to employee.
6. Spongberg Enterprises Ltd. encourages proper segregation of waste materials to ensure opportunities for reuse or recycling.
7. Employees must be instructed on the proper handling, storage, and disposal of wastes. This may include general instruction on disposal of non-hazardous wastes, trash, or scrap materials. If wastes generated are classified as hazardous, employees must be trained to ensure proper disposal.



SEL Environmental- Spill Prevention and Response Guidelines (Page SPR1)

1. Chemical substances should be stored in proper containers to minimize the potential for a spill. Whenever possible, chemicals should be kept in closed containers and stored so they are not exposed to stormwater.
2. A proper spill kit must contain the appropriate supplies for materials that may be spilled. Supplies must be easily accessible when required, and considerations must be made for both the type and quantity of materials.
3. Spongberg Enterprises Ltd. ensure the availability of adequate spill response supplies by periodic inspection to assess their availability and adjust inventory as necessary.
4. Employees must be instructed on the proper response procedures for spilled materials. The training should include materials available for use, proper waste disposal, and communication procedures.
5. Environmental spills must be reported to environmental authorities. Reporting procedures will be based on type and quantity of materials spilled.



Short Service Employee Guidelines (Page SSE1)

1. Any newly hired SEL employee is considered a Short Service Employee, regardless of previous experience or work history. Until the employee has worked 6 continuous months, they will be considered a Short Service Employee.
2. A single person crew cannot be an SSE and crew sizes of less than five shall have no more than one SSE.
3. Prior to the job mobilization, contractors will communicate/notify the project coordinator, contractor contact, or on-site supervisor for all jobs containing SSE personnel. The project coordinator, contractor contact, or on-site supervisor will determine approval status of the crew makeup.
4. SSE personnel shall be visibly identified with a Green hard hat.
5. Contractors shall monitor its employees, including SSE personnel, for HES awareness. If, at the end of the six-month period, the SSE has worked safely, adhered to HES policies and has no recordable incident attributable to him/her, the SSE identifier may be removed at the contractor's discretion. Contractor shall require any employee that does not complete the six-month period recordable free to get operator approval in writing prior to returning to operator property.
6. Contractor must have in place some form of mentoring process, acceptable to the operator, designed to provide guidance and development for SSE personnel. A mentor can only be assigned one SSE per crew and the mentor must be onsite with the SSE to be able to monitor the SSE.
7. Contractors will manage their sub-contractors in alignment with this process.



Subcontractor Management Plan (Page SMP1)

1. Written Health, Safety, and Environmental programs and training documentation (applicable to the type of work the subcontractor will perform) should be obtained and reviewed to assist with the hiring of safe subcontractors.
2. Past performance is a key indicator of future performance. HSE statistics should be obtained and analyzed to ensure that only safe subcontractors are hired. Obtain a copy of the subcontractor's workers compensation rate sheet and compare their performance to others in their industry. Those who outperform the industry should be selected whenever practicable.
3. Subcontractors must be provided a site orientation that addresses health, safety, security, and/or environmental concerns.
4. Subcontractors shall be included in pre-job meetings and hazard assessments. Pre-job meetings can include information taken from a hazard assessment and any other safety or operational concerns.
5. Post job performance reviews should be conducted for subcontractors. A combination of factors may be considered including, but not limited to, housekeeping, cost, active participation in safety meetings, and quality of work.

