



Title: Alcohol & Drug Policy	Date of Issue: February 27, 2006
Location: All	Date of Revision: August 25, 2020

TPS Group of Companies is dedicated to providing a work environment in which all employees are safe from harm. The company recognizes that substance abuse has a negative impact on performance; alcohol and drug use can have a negative impact on corporate culture, morale and image, in increased corporate liability regarding employee and public safety.

TPS Group of Companies recognizes that the use of alcohol or drugs may adversely affect the ability of the employee to satisfactorily perform his or her duties, the interests of other employees, the health and safety of the employee himself, and/or the employer's reputation.

TPS Group of Companies has established the following policy for all employees.

The following is a description of the substances that are covered by this policy:

1. Intoxicating liquor, regardless of its alcoholic content
2. A narcotic drug or any derivative thereof
3. An amphetamine or any formulation thereof (including, but not limited to "pep pills and bennies").

Any employee taking a medication prescribed by a physician must make their supervisor aware of the situation.

No employee shall:

1. Consume a listed substance, or be under the influence of a listed substance, prior to the start of their shift.
2. Consume a listed substance, or be under the influence of a listed substance, while on duty or
3. Operate a motor vehicle while he possesses or is under the influence of a listed substance.

TPS Group of Companies is instituting a zero-tolerance policy. If any employee is found to be in breach of this policy, they will be terminated immediately.

The workplace for the TPS Group of Companies is defined as all offices, buildings, vehicles and client sites in which the TPS Group of Companies is conducted.



Title: Cell Phone Policy	Date of Issue: January 25, 2016
Location: All	Date of Revision: August 25, 2020

The purpose of this Policy is to eliminate the use of cell phones and other communication devices while at work in order to protect the employee and their co-workers. Inappropriate use of communication devices at work can cause injuries because it's distracting, interfere with job performance and, displays unprofessionalism toward our customers.

The devices covered by this Policy include cell phones, Blackberries, text pagers, two-way radios, and other wireless devices and applies to all employees. The rules set out in this Policy apply to all work-related activities. The Policy applies to all conversations, whether personal or business-related.

While in the workplace during work hours, workers are expected to focus on work and may not inappropriately use any device in the workplace for any purposes, including but not limited to: engaging in personal conversations; Facebook; playing games; surfing the internet; checking e-mail; and, sending or receiving text messages. Workers may use devices while on their designated break period.

Workers who violate this Policy will be subject to disciplinary measures to be determined by the Company. Any negligence or workplace accidents caused by employee cell phone use are subject to immediate termination.

Exemption: *As per job requirements, Confined Space Attendants will require two-way radios for constant communication with entrants of the confined space. Also, Confined Space Attendants/Rescuers Working Lead will have a cell phone on-site in case of emergency.*



Title: Workplace Violence & Harassment	Date of Issue: February 27, 2006
Location: All	Date of Revision: December 16, 2020

TPS Group of Companies is committed to providing a work environment in which all workers are treated with respect and dignity. Workplace harassment will not be tolerated from any person in the workplace [including customers, clients, other employers, supervisors, workers, and members of the public, as applicable].

Workplace harassment is defined as engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome or workplace sexual harassment. Workplace sexual harassment means:

- a. engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or
- b. making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Workplace violence is defined as the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker. Workplace violence means:

- a. an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker,
- b. a statement or behavior that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Reasonable action taken by the employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment. 14-1

Workers are encouraged to report any incidents of workplace harassment to the appropriate person. including a JHSC worker rep, human resources, supervisor, or management.

Management will investigate and deal with all complaints or incidents of workplace harassment in a fair, respectful and timely manner. Information provided about an incident or about a complaint will not be disclosed except as necessary to protect workers, to investigate the complaint or incident, to take corrective action or as otherwise required by law.

Managers, supervisors, and workers are expected to adhere to this policy and will be held responsible by the employer for not following it. Workers are not to be penalized or disciplined for reporting an incident or for participating in an investigation involving workplace harassment.

If a worker needs further assistance, they may contact a member of the JHSC or their health and safety representative.



Title: Health, Safety & Environmental Policy	Date of Issue: February 27, 2006
Location: All	Date of Revision: August 25, 2020

Our Management staff is committed to ensuring that all work performed for, or on its behalf, will be done legally, efficiently and safely.

THE COMPANY IS COMMITTED TO:

- Providing a safe and healthy workplace, free of unsafe conditions, fire and environmental hazards.
- Maintaining and operating all equipment in a manner consistent with our objectives of ensuring a safe and effective workplace.
- Requiring and demanding the use of safe working practices and methods at all times.
- Insisting on a secure working environment that prevents personal injury, product loss and property damage.
- Developing a workforce that is safety conscious while working towards eliminating personal and environmental hazards.
- Ensuring compliance with all Federal/Provincial safety legislation and other legal requirements.

Protection of workers from injury or occupational disease is a major continuing objective. All workers have the responsibility to make Health & Safety a part of their daily routine and are required to work in a safe and productive manner that protects not only their safety but the safety of other workers.

Managers and Supervisors are responsible and accountable for the safety of all workers and/or contractors performing work under their supervision. It is the responsibility of each Manager and Supervisor to ensure all workers are adequately trained to enable them to perform their job functions in a safe and productive manner so as to prevent personal injuries, property damage and/or losses due to accident, fire and environmental hazards.

The Company believes that these principles will not only enable us to meet or exceed our overall business goals but will ensure the health and safety of the workers, contractors and our customers while protecting the environment of the communities in which we operate.



Title: Clean Shaven Policy	Date of Issue: January 25, 2016
Location: All	Date of Revision: August 25, 2020

PURPOSE: To provide a company standard to manage the hazards associated with having facial or long hair. This policy is in accordance with Vale's policy SPI SAF-10.

SCOPE: It is recognized that not all workplaces can be made free of all hazards. However, to aid in attaining our goal of Zero Harm there are numerous risk management methods employed across the organization that help manage hazards and reduce risk to as low as reasonably achievable. Risk can be controlled or managed through effective planning and working the plan. Effective planning includes putting in controls to manage the hazards such as rules and procedures. **This applies to ALL Vale sites.**

SPECIFICATIONS:

Facial Hair – including Beards, Moustaches, and Sideburns, etc. Every person who works either on a regular or temporary basis, in areas or situations where the continuous, periodic or emergency use of respiratory protective devices are or could be required **shall** be clean shaven where the face-piece seals to the skin. Facial hair, including stubble, makes it not only impossible to obtain a satisfactory face to face-piece seal of the device, but also may interfere with the operation of the inhalation and exhalation valves of the device.

Long Hair - Long or styled hair which may be classed as hazardous in an operating environment, shall be controlled/confined with the aid of a net, or mop cap, or where the aforementioned action is not considered satisfactory it shall be cut in order to ensure that:

- a) Entanglement in machinery is prevented.
- b) Contact with hot metal or other sources of ignition is prevented (e.g., burning/welding operations)
- c) A correct fit for the person's head protection is obtained. Chinstraps are available if required.
- d) It does not interfere with the seal of hearing protection and/or respiratory protection. The earmuffs shall not be worn over hair, which covers or partly covers the ears.
- e) The hair does not obstruct the employee's vision.

No employee shall be permitted to wear long or facial hair (beards, moustaches, sideburns, etc.) where there exists a possibility of his or her safety or health being jeopardized as a result.



Title: Smoking Policy	Date of Issue: January 25, 2017
Location: All	Date of Revision: August 25, 2020

In conjunction with the Health, Safety and Environmental policy which makes a commitment to:

- Providing a safe and healthy workplace, free of unsafe conditions, fire and environmental hazards plus,
- Ensuring compliance with all Federal/Provincial safety legislation and other legal requirements

The Smoking Policy is to serve as further commitment to these standards.

The facility is declared as a smoke free facility. Smoking is banned from any/all “enclosed workplaces”.

Enclosed workplace is defined as, any building, vehicle or enclosure with a roof and two (2) walls, regardless of size, that employees work in or have access to during the course of their employment, whether or not they are acting in the course of their employment at that time.

This would include, but is not limited to, within the confines of this facility, inside all company vehicles, inside trailers docked at any loading/unloading door, any outside smoking area which falls under the guidelines of “enclosed workplace”. Therefore, no worker, tenant, contractor, customer or representative of the company will avail themselves to smoking under the above mentioned guidelines. ****Smoking includes carrying a lit cigar, cigarette or pipe****

Smoking is only permitted at appropriately designed and/or designated locations which are totally separate from the main structure and do not fall under the definition of an enclosed workspace. ****Where applicable, Municipal by-laws will supersede this policy****

Requirements and Enforcement:

- Each locations shall post appropriate signage at all entrances/exits & washrooms
- All smoking related paraphernalia (ashtrays) shall be removed
- All violations of this policy are to be reported to Management immediately
- It is Management's commitment to ensure this policy is communicated, posted & enforced
- All violations of this policy shall be dealt with through the normal corrective action process which would include action up to and including termination of employment