LOWER CHURCHILL PROJECT
SITE HANDBOOK

Information in this Site Handbook is proprietary to Nalcor Energy – Lower Churchill Project (LCP). Hard copies of this handbook are not reissued for every update.

Emergency Response

Medical Centre _____________________________

Emergency Response ______________________

Radio Channels ____________________________

Contact Numbers

Main ____________________________

Security ____________________________

Supervisor Name _____________________________

Supervisor Phone ____________________________

Local Safety Advisor _________________________

Location of Closest Medical Provider

_________________________________________

_________________________________________

Location of Emergency Muster Station

_________________________________________

_________________________________________
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Welcome to the Lower Churchill Project

On behalf of Nalcor Energy, I would like to welcome you to the Muskrat Falls, Lower Churchill Project (LCP). As part of the LCP, you are a valued member of our team.

Nalcor is committed to promoting and maintaining a positive project culture throughout the various phases of the LCP. The pages of this Handbook set out the standards of conduct to be followed by all personnel. It outlines practices to maintain a work environment that is safe, healthy and environmentally friendly, as well as addressing issues associated with ensuring a respectful and productive workplace.

The LCP will set the standard for execution of major project work in Newfoundland & Labrador. Our priorities are our people, and we will lead the industry in labor relations, safety and productivity.

You have been provided with a copy of the LCP Site Handbook and are required to read and comply with the safety absolutes, rules and other requirements contained in the Handbook.

Thank you and again, welcome to the Muskrat Falls Lower Churchill Project.

Paul Harrington
Project Director, Lower Churchill Project
Occupational Health and Safety Policy

The safety of our employees, contractors, visitors and the public is our first and most important priority. Our goal is a workplace where nobody gets hurt – zero harm – and a working environment where each and every employee is always concerned for their own safety and the safety of others. In support of this goal, Nalcor Energy and its employees are committed to the following guiding principles:

1) Employees will govern their actions in accordance with Nalcor Energy’s Internal Responsibility System for safety. This includes adherence to the principles of employee and role related responsibilities for their personal safety and the safety of their co-workers, contractors, visitors, and members of the public.

2) Nalcor Energy shall establish and maintain an Occupational Health & Safety Management System (HSMS) which:
a. meets or exceeds legislated requirements and is compliant with accepted industry standards and practice; and

b. documents health and safety objectives for Nalcor Energy; and

c. contains a mechanism for performance measurement and continuous improvement; and

d. facilitates both the formal and informal involvement of employees in the development, maintenance, and improvement of occupational health and safety within the organization.

[Signature]

President and CEO
Nalcor Energy
Environmental Policy and Guiding Principles

All Nalcor Energy companies will help sustain a diverse and healthy environment for present and future Newfoundlanders and Labradorians by maintaining a high standard of environmental responsibility and performance through the implementation of a comprehensive environmental management system.

The environmental principles that follow guide Nalcor Energy companies’ environmental actions and decision-making:

Prevention of Pollution

• implement reasonable actions for prevention of pollution of air, water, and soil and minimize the impact of any pollution which is accidental or unavoidable;
• use the Province’s natural resources in a wise and efficient manner;
• use energy as efficiently as possible during the generation, transmission, and distribution of electricity, and the operation of its facilities, and promote efficient use of electricity by stakeholders;
• maintain an adequate level of emergency preparedness in order to respond quickly and effectively to environmental emergencies; and
• recover, reduce, reuse and recycle waste materials whenever feasible.

**Improve Continually**

- audit facilities to assess potential environmental risks and to identify opportunities for continual improvement of environmental performance;
- establish environmental objectives and targets, and monitor environmental performance;
- integrate environmental considerations into decision-making processes at all levels; and
- empower employees to be responsible for the environmental aspects of their jobs and ensure that they have the skills and knowledge necessary to conduct their work in an environmentally responsible manner.

**Comply with Legislation**

- comply with all applicable environmental laws and regulations, and participate in the Canadian Electricity Association’s Sustainable Electricity Program;
- periodically report to the Board of Directors, Leadership Team, employees, government agencies, and the general public on environmental performance, commitments and activities;
• monitor compliance with environmental laws and regulations, and quantify predicted environmental impacts of selected activities on the environment; and
• respect the cultural heritage of the people of the Province and strive to minimize the potential impact of Corporate activities on heritage resources.

Approved by: __________________

Date: February 3, 2010
About this Handbook

This Handbook provides background information about the Lower Churchill Project (LCP), general health and safety information, as well as information about human resources and labour relations. Please read the Handbook carefully and if you have any questions, ask your supervisor or a member of the management team.

This Handbook is not intended to address all of the LCP’s policies, procedures, standards and operating practices. Personnel should confer with their supervisor if guidance or assistance is required for matters that are not addressed in this Handbook.

Written guidelines assist the efficient operation of an organization and support the fair treatment of all personnel. While this Handbook attempts to set out guidelines for personnel practices on the project, business circumstances, revisions in the law and other factors may make revisions necessary. In such cases, efforts will be made to communicate the change to those affected. By accepting or continuing their employment, personnel of Nalcor and Nalcor’s contractors agree to conform to these guidelines, policies, procedures and standards. This Handbook is not intended to be and does not constitute a contract of employment. It is published for
informational purposes only. The guidelines, policies, procedures outlined in this Handbook may be changed, modified, superseded, suspended or cancelled at any time at the sole discretion of Nalcor with or without prior notice. From time to time specific locations, divisions and organizations may implement guidelines more appropriate to their working environment, industry practices or special needs than the general guidelines contained in this Handbook.

Despite the geographical locations under which the project is being constructed, good management principles dictate fair, equitable and consistent application of policies. While this is always considered, it is not possible in every instance because of the nature and the variety of work situations and location requirements.

As a prerequisite to starting work on the Project, potential employees and new hires must attend an LCP pre-employment orientation session that includes but is not limited to, health, safety and environmental obligations, human resources policies, including respectful workplace; cultural sensitivity, Innu cross-cultural training; gender equity and diversity; labour relations, including an overview of the collective agreement, site standards, rules, corrective action and dispute resolution. Upon successful completion of the LCP pre-employment orientation, new hires will then complete a job site specific orientation facilitated by their respective contractor.
Scope

This Handbook applies to the construction of Phase One of the LCP, the Muskrat Falls Project. It is applicable to all workers that travel to and work on any of the project sites (outlined in the Project Description Section) including members of the Nalcor owner’s team, contractors, suppliers and union members.

Who We Are and What We Are Committed to Achieving

Nalcor Energy

Nalcor Energy is Newfoundland and Labrador’s energy company. Headquartered in St. John’s, the company’s business includes the development, generation, transmission and sale of electricity; the exploration, development, production and sale of oil and gas; industrial fabrication; and energy marketing.

Focused on sustainable growth, the company is leading the development of the province’s energy resources and has a corporate-wide framework which facilitates the prudent management of its assets while continuing an unwavering focus on the safety of its workers and the public.

Nalcor currently has six lines of business: Newfoundland and Labrador Hydro, Churchill
Falls, Oil and Gas, the Lower Churchill Project, Bull Arm Fabrication and Energy Marketing.

Nalcor’s vision is to build a strong economic future for successive generations of Newfoundlanders and Labradorians.

Five goals drive Nalcor’s business:

1) Safety: to be a safety leader;
2) Environment: to be an environmental leader;
3) Business Excellence: through operational excellence, provide exceptional value to all consumers of our energy;
4) People: to ensure a highly skilled and motivated team of employees who are committed to Nalcor Energy’s success and future direction;
5) Community: to be a valued corporate citizen in Newfoundland and Labrador.

The Lower Churchill Project

The LCP is one of the most attractive undeveloped hydroelectric sites in North America and is a key component of the province’s energy warehouse. The LCP’s two sites at Gull Island and Muskrat Falls have a combined energy capacity of over 3,000 megawatts (MW). The clean, stable, renewable electricity provides an opportunity for the province to meet its own domestic and industrial needs in an
environmentally-sustainable way, and also export electricity to other jurisdictions where the demand for clean, renewable energy continues to grow.

Nalcor is developing Phase One of the LCP which includes an 824 MW hydroelectric generating facility at Muskrat Falls and associated transmission links to Newfoundland and Nova Scotia.

**Project Description**

LCP Phase One development includes the following key components:

The **Muskrat Falls Generation** will consist of the construction of an 824 MW generating station with a powerhouse that will contain four turbines. A 59km long, 101 km² reservoir will be contained by a concrete dam on the north side of the river and a rock filled dam on the south side.

The 900MW, 350 kilovolt (kV) bi-pole **Labrador-Island Transmission Link** is a 1,100km long High Voltage direct current (HVdc) interconnection that will run from the Muskrat Falls generating station to Soldiers Pond near Holyrood, Newfoundland. Each end of the line energy will be connected from AC to DC and vice versa through converter stations and switchyards.
The **Labrador Transmission Assets** includes two 247km, 315kV High Voltage alternating current (HVac) transmission lines connecting Muskrat Falls generation station and Churchill Falls generation station, along with switchyards at both Muskrat Falls and Churchill Falls to facilitate the connection of the 315kV feed.

In addition, Emera Newfoundland & Labrador Inc. will construct a 500 MW, 250kV 480km HVdc **Maritime Transmission Link** from Cape Ray in western Newfoundland to Lingan, Nova Scotia.

**Nalcor’s Core Values**

Nalcor aspires to be a proud, diverse energy company, whose people are committed to building a bright future for Newfoundland and Labrador, unified by its core values:

**Open Communication:** Fostering an environment where information moves freely in a timely manner.

**Accountability:** Holding ourselves responsible for our actions and performance.

**Safety:** Relentless commitment to protecting ourselves, our colleagues and our community.

**Honesty and Trust:** Being sincere in everything we say and do.
Team Work: Sharing our ideas in an open and supportive manner to achieve excellence.

Respect and Dignity: Appreciating the individuality of others by our words and actions.

Leadership: Empowering individuals to help guide and inspire others.

Nalcor’s Code

Nalcor’s Code of Business Conduct and Ethics (Code) reinforces the company’s commitment to professional and ethical business practices. All Nalcor employees, contractors and unions should adhere to the Code.

Four key principles guide how we should apply the Code in our day-to-day work:

• The commercial, reputational and other interests of Nalcor must always take precedence over personal interests and those of third parties;
• We must always avoid any act or conduct – intentional or not – that may support the private interests of a third party or an individual over those of Nalcor;
• Any conflict of interest – real or perceived – has the potential to impair the company’s credibility, reputation and commercial interests;
• We have an obligation to perform our duties and responsibilities in a conscientious manner, and never allow our personal interests to conflict with those of Nalcor.
Health and Safety
Health and Safety

The health and safety portion of this Handbook is based on the Lower Churchill Project Health and Safety Management Plan. The Health, Safety and Security practices outlined in this Handbook are not a substitute for the required safety training and safe work practices and procedures.

Nalcor Energy’s Safety Credo

The safety of employees, consultants, contractors, visitors and the public is our core value. Our goal is a workplace where nobody gets hurt – zero harm – and a working environment where each and every employee and contractor is continuously concerned for their own safety, and the safety of others.

Nalcor’s Safety Credo states three basic rules that must be applied to the workplace:

- *I always follow safety requirements and best practices;*
- *I always take time to complete my work safely;*
- *I always take action when I see unsafe acts or conditions.*
Safety Absolutes

In an effort to achieve our “Zero Harm” target, a number of safety absolutes have been established. Close attention should be paid to the violations listed below, which will lead to the denial or revocation of site access and termination of your employment by your employer, unless there are exceptional mitigating circumstances:

• Tampering with safety devices or emergency response equipment;
• Operating equipment or vehicles without the proper licensing, authority, training or qualifications;
• Willful damage to property and/or equipment;
• Blatant disregard of properly marked zones of imminent danger (e.g. flagging);
  • Falsification of reports, statements, or records;
• Non-compliance of the information contained in the two day Fall Protection standard prescribed by WHSCC, NL including training, proper selection of fall protection equipment and anchorage points for any work above six feet or less if there is an unusual possibility of risk or danger;
• Any violation of energy isolation procedures (e.g. mechanical, electrical, pneumatic);
• Unauthorized modification of scaffolding or other work platform leading edges;
• Working without a construction permit as specified on the StepBack card;
• Failure to conduct a StepBack Field Level Hazard Assessment **prior** to starting every assigned task and/or task change;
• Refusal to submit to requested searches (e.g. vehicle, toolbox, lunchbox);
• Non-compliance with the Lower Churchill Project Standard for Drug and Alcohol, including but not limited to:
  • Reporting for work under the influence of alcohol or illegal drugs;
  • Possession of alcohol, illegal drugs or illegal drug paraphernalia;
  • Distribute, sell or attempt to sell drugs or illegal drug paraphernalia, or engage in unauthorized distribution, offering, or sale of prescription medication;
  • Refusing to submit to a requested just cause or post incident drug and alcohol test;
• Physical harassment of other site personnel;
• Operating mobile machinery and equipment while using cellular devices or without the use of a seatbelt;
• Walking or working under a suspended load;
• Serious violation of safety policies, procedures or standards (ex. lock-out violation or confined space violation).
Project Personal Protective Equipment (PPE) Standard

All personnel entering a LCP work site must adhere to the PPE Standard at all times.

- Class E or G CSA Type II approved hardhat at all times. Unless otherwise approved for trade specific, the bill of the hard hat must face forward unless a safety device, like a welding shield, is attached. Hardhat hood combinations are mandatory for all welders on site;
- Wear CSA approved safety glasses with approved side shields during work hours. No dark glasses inside dark buildings or in poor light;
- Cut resistant gloves must be worn at all time when handling knives or other tools with exposed blades as well as material with sharp surfaces;
- Gloves are required for all tasks. Hand protection appropriate for the hazard must be worn;
- Reflective apparel, when required, must meet minimum CSA Class 2, level 2 requirements;
- Safety boots (steel toe and a minimum 6” boot height).

Any requirements for additional task-specific PPE will be determined through a risk assessment. (TBRA- Task Based Risk Assessment)
Project Safety Orientation

The project Safety Orientation is a prerequisite to entering any LCP site, except for those persons entering the site as a visitor (visitors must be accompanied by a designated, orientated Project person at all times and will abide by the LCP Health & Safety Management Plan and will receive a Visitor Safety Orientation).

Drug and Alcohol Standard

The Project team has developed a Drug and Alcohol Standard based on the Canadian Model for Providing a Safe Workplace. Contractors must ensure that all workers deployed to any project site are fit to safely and reliably perform their work duties, and that these workers must remain fit for duty throughout their work shift, and free from impairment due to alcohol and/or drugs. Workers will submit to a drug and alcohol testing procedure in the following circumstances: pre-access; reasonable cause and post-incident. Contractors must have a drug and alcohol policy that is at least equivalent to the requirements set out in the Canadian Model and this standard.

Nalcor has declared the LCP worksites as “Dry Sites”, whereby the possession, use and sale of alcohol are strictly prohibited.

Non-compliance of this standard will result in denial or revocation of site access and
termination of your employment by your employer, unless there are exceptional mitigating circumstances.

**Incident Notifications Requirements**

All incidents must be reported verbally *within two hours of occurrence* through the safety management organization. The severity of the incident or the severity potential determines the reporting/notification requirements for each incident. A written (preliminary) report is required to be prepared by the employee’s employer within 24 hours of occurrence. All Near Miss situations and Hazardous Conditions/Behaviors will be reported promptly using the same incident report process described above. These situations will be looked upon as a learning opportunity and will be treated seriously.

Near Miss Incidents having serious potential (an incident where, under other/different circumstances, could have resulted in serious injury or fatality) will be included in Nalcor’s Safe Workplace Observation Program (SWOP) database and will be fully investigated and have mitigating measures identified and tracked to completion. Other Near Miss Incidents will be recorded and, as appropriate, investigated, to derive any lessons learned (as noted above). All incidents will be communicated to affected and
potentially affected personnel and addressed in tool box talks and safety meetings as a means to increase overall awareness in an effort to prevent similar incidents from recurrence.

Case Management

All incidents resulting in personal injury will be effectively managed in order to:

- Prevent further injury;
- Aid in the recovery of the injured person;
- Reduce the possibility of an incident classification escalation (i.e. from a first aid incident to a medical aid or lost time, etc.);
- Ensure adherence to all applicable Workplace, Health, Safety and Compensation Commission requirements;
- All LCP contractors will have an effective modified duty program;
- All injured persons will be offered meaningful modified work if approved by the attending physician, and where appropriate an independent physician;
- These modified duties will meet all restrictions placed on the injured person by the attending physician.

Security

LCP security management may include, but is not limited to the following procedures that:
• Control access of all personnel, vehicles and material through the use of swipe cards, vehicle permits, material lists and passes, camera passes, visual vehicle inspections, and property searches;
• Ensure visitors are properly registered, equipped with the suitable PPE for the area they are visiting, given an appropriate orientation, and accompanied by a responsible person;
• Prevent unauthorized entry and removal of materials and equipment using video surveillance and inspection of personal property including brief cases, back packs, lunch boxes, tool boxes, vehicles and any other item at the discretion of security management.

Joint Occupational Health and Safety Committee (JOHSC)

It is the policy of Nalcor as well as a regulatory requirement to ensure that all personnel are provided an opportunity to be involved in health and safety program development and improvement efforts. Formal health and safety committees provide leadership and direction for the project and allow for participation and input at all levels. The Health and Safety Committee structure is designed to establish positive, two-way communication throughout the organization and facility. The organization and function of the
Health and Safety Committee shall be designed to meet the intent of applicable Newfoundland and Labrador legislation.

**Safe Work Practices and Procedures**

The LCP team will ensure there is adequate and appropriate development and implementation of safe work practices by project contractors, based on the contractors’ scopes of work. All contractors and workers are responsible to ensure they have sufficient and correct training to use these practices and procedures. Quarterly inspections are required on the project.

**Housekeeping**

Keeping your work area tidy encourages safe work habits. Good housekeeping is a basic requirement in all construction areas and shall be maintained at all times. The following general housekeeping requirements apply:

- Clean up regularly as the job progresses;
- Ensure equipment and tools are stable and secure, cannot fall over or from the work area, and are stored appropriately;
- Ensure that all stored hoses, cords and cables are neatly coiled and hung on appropriately designed hangers off the ground;
- Keep the floor, ground and gratings clear of tools, welding materials and waste, metal shavings, etc.
• Store or contain material in such a way that prevents a potential fire from starting.

**Access and Egress**

• Routes leading to and from all work locations shall be kept free and clear of obstructions and be well lit;
• Walkways and stairways shall be clear, ladders shall not be blocked, and emergency exits shall be easily identified and clear of all obstructions. Stairs, landings and platforms shall have proper handrails;
• Never block the access to any emergency equipment, fire extinguisher or electrical disconnect switch.

**Avoiding Slips and Trips**

• Keep work areas well lit and organized;
• Clean up any spills immediately;
• Keep snow and ice off walkways;
• Practice safe walking skills by taking shorter steps and paying continuous attention to your path;
• Practice three point ascent and descent on ladders;
• Walk at a steady pace and do not run;
• Use the walkways and accesses provided;
• Always use handrails on stairways.
Material Handling - Save Your Back

Improper lifting and handling may lead to serious back injuries. Mechanical handling is required and shall be utilized for lifting all items over 25 kg (55 lb.). When lifting by hand, abide by the 25 kg limit and use the following lifting techniques:

- Always wear gloves;
- Know the weight of any object to be handled;
- Plan your lift, test the load and ask for help when needed (e.g., awkward or slippery packaging);
- Get a firm footing, bend your knees and tighten your stomach muscles;
- Lift with your legs and keep your back straight;
- Keep the load close to your body;
- Keep your back upright and do not twist when moving and carrying the load;
- Avoid stairs and inclines when carrying heavy objects;
• Manual lifting of tools or equipment when using a ladder is prohibited (three-point contact must be maintained on the ladder at all times).

Welding and Cutting

During any welding or cutting procedures the worker shall:

• Inspect all leads, grounds, clamps, welding machines, hoses, gauges, torches, and cylinders each day before use and ensure that all fittings, couplings and connections are tight;
• Only use cutting torch, welding and oxygen/fuel gas systems equipped with anti-flashback arrestors at the regulator and at the torch;
• Keep welding leads and oxy/acetylene hoses clear of passageways and protect them from damage;
• Erect proper barriers or screens to protect other workers from exposure to welding flash;
• A trained fire watch is required in areas where there is a potential for fire;
• Ensure that a 9kg/20lb ABC dry-chemical fire extinguisher is immediately available in the work area.
Ladder Safety

Ladders shall be commercially manufactured and comply with CSA Standard CAN3-Z11-M81 (R2001), *Portable Ladders*. All ladders shall only be utilized within the safe working load and conditions that are listed on the ladder. No “job built” or other similar type ladders shall be used.

Inspect the ladder before each use for signs of damage and ensure the following safe ladder procedures are used:

- Face the ladder when climbing up or down, and always maintain 3-point contact;
- Change the position of the ladder if required to avoid overreaching (“rule of thumb”: keep your belt buckle within the rails of the ladder);
- Tag and remove damaged ladders from service;
- Use a rope and canvas tool bag or bucket to move tools and material to working heights. Do not carry tools or materials when using a ladder;
- Always fully open a stepladder and set it level on all four feet, with spreaders locked in place;
- Never use a stepladder like a straight ladder;
- Do not use the top two steps of the stepladder;
• Always place ladders against solid surfaces;
• The vertical distance must be four times the horizontal distance and the top of the ladder shall extend a minimum of 1m (3 ft.) beyond the supporting object;
• The ladder shall be adequately tied off at the top and bottom;
• Do not use extension ladder sections separately.

**Scaffolds**

Scaffolds shall only be erected and dismantled by qualified scaffold erectors. Do not combine parts and sections of scaffolding made by one manufacturer with those made by another manufacturer.

**Scaffold Tagging**

The tagging color code to be used is:

**Red**: “Danger – Do Not Use” – Scaffold is incomplete

**Yellow**: “Caution” – Special requirements for use (e.g., fall arrest equipment is required)

**Green**: “Safe for Use”

A worker shall not use a scaffold if it has:
• A red tag;
• A green or yellow tag that has expired;
• No tag at all.

Flagging and Hazard Signs

Flagging is used to warn of hazards that exist in work areas. When flagging an area:

• Flag off only the areas where the hazard exists;
• Use the appropriate type of flagging for the hazard and completely fill out the flagging tag;
• Remove the flagging promptly when complete;
• Tagging should be included and kept current on all flagging for the purpose of identifying the person who has erected the flagging, the purpose of the flagging, and contact information in the event entry is required.

Red Flagging:

“Danger – Do Not Enter” flagging is to be used where the risk factor to personnel working in the immediate area is high. No access is allowed, except for the crew doing the work.

Yellow Flagging:

“Caution” flagging is to provide a warning that hazards exist in an area and you should look for
an alternate route. If no alternate route is available, read the flagging tag, look for and plan to avoid the hazard, ask permission of the workers inside and proceed with caution.

**Radiation Flagging:**

Radiation barriers are yellow and magenta colored flagging, or ropes and radiation signs.

**Warning Signs:**

Warning signs are used to indicate specific hazards (e.g., “Danger – High Voltage” “Caution – Overhead Work” etc.).

**Excavations**

All excavations shall comply with the following rules:

- All excavations must be identified to other workers through flagging, marking; safeguards, or other appropriate and effective means;
- All excavation walls shall be checked before entering, especially after a heavy rain or thaw;
- Shoring shall be checked daily or more often in extremely wet weather;
- No worker shall be in an excavation when any equipment is working next to the edge – keep all heavy equipment away from trench edges;
• Test for low oxygen, hazardous fumes, and toxic gases – the excavation may be a confined space. ie: Excavations deeper than 4 feet;
• Ensure there are safe and adequate ladders for access/egress.

Vehicle Requirements

Workers shall not use LCP vehicles unless assigned by their supervisor. Any worker who operates a vehicle shall comply with the following requirements:

• Possess a valid driver’s license for the class of vehicle being used;
• Inspect the vehicle at the beginning of each shift before use by completing a thorough walk-around and doing operational/functional checks;
• All vehicles shall be equipped with a 9kg/20lb ABC dry-chemical fire extinguisher, a first aid kit – minimum Class 2 and flares;
• “Buggy whips” (minimum 3.6m in height) are required in and around the Muskrat Falls generating station construction area. 3.6m Buggy Whips are not required to be the lighted type;
• Ensure that all tools and materials are transported in a safe and secure manner;
• Wear a seatbelt at all times while driving, both on and off site, and ensure that seat
BELTS ARE WORN BY ALL PASSENGERS;
• Always give pedestrians the right of way;
• Observe posted speed limits and other regulatory signs and practice safe driving at all times;
• Do not use cellular phones or mobile devices unless the vehicle is stopped and parked in a safe location;
• Practice safe refuelling procedures;
• Do not ride in the bed of any vehicle;
• In winter, ensure that all windows and hood and roof are clear of snow, ice and condensation before moving;
• Immediately report all vehicle incidents;
• All site vehicles are required to have back-up alarms, sounding the horn twice before backing up is not necessary;
• Strictly comply with project parking regulations and back into parking areas;
• Use a spotter when backing a vehicle into a congested area or under circumstances with limited clearance or visibility;
• Heavy haul vehicles have the right of way on work site locations;
• All site light vehicles are required to have a rotating/revolving amber coloured beacon mounted on the top of the cab and must be fully operational when driving on the site. Amber light should be turned off after the vehicle has left the project footprint.
Pedestrian Safety

- Walk on the left side of site roads unless directed to do otherwise;
- Do not take shortcuts through other construction areas or buildings;
- Wherever there exists potential interaction between pedestrians, vehicles and heavy equipment designated walkways will be established and well-marked. It is mandatory that all pedestrians utilize these walkways;
- Scan ahead for potential hazards in the work site;
- When walking to a location be aware of your surroundings, always observing for any potential hazards.

Fire Protection

- Fire extinguishers are located where they can be readily accessed in case of fire and are inspected monthly;
- Storage areas for flammable liquids, gas cylinders, explosives, etc., shall be located well away from worksites, field offices and sources of ignition;
- Fire extinguishers and appropriate signage shall be located in the immediate storage area;
- Flammable or combustible liquids shall be stored only in approved metal safety cans and portable tanks. No plastic containers to be used;
• Fire extinguishers required for emergency service shall not be used for construction use;
• Adequate firefighting tools and water will be readily available at all sites in forested areas during forest fire season. Every reasonable effort will be made to ensure that LCP activities do not result in forest fires.

**Working at Heights**

The Project is committed to providing a safe work environment for its employees and preventing occupational injuries due to falls. Fall Protection is an integral part of our commitment to a safe work environment. Any time a worker is exposed to a fall hazard in excess of two (2) meters, or where there is an unusual possibility of danger, Fall Protection will be required or a procedure and equipment to reduce and/or eliminate the hazard of working at height. Fall Protection shall be achieved through a hierarchy of controls that will involve all levels of management, supervisory and field personnel. This hierarchy shall be: elimination of hazards through engineering (design) and procedural practices; control and mitigation of hazards through passive fall protection; travel restraint systems; the use of fall arrest systems; and finally the use of administrative controls. Supervisors and workers shall be expected to assess the risks associated with a task and ensure that proper mitigation is in place to protect them while
climbing and working at heights. Where a worker is unsure of the methods, equipment or procedures to reduce the risk they are to seek direction from their supervisor.

**Energy Isolation (Lock-out/Tag-out)**

The purpose of having an energy isolation standard is to eliminate or minimize the risk of fatalities, injuries and incidents arising from the uncontrolled and unexpected release of energy or hazardous materials. The standard applies to all sources of energy including: electrical, mechanical, hydraulic, chemical, gravitational, pneumatic, kinetic and stored energy.

The failure to isolate an energy source can create an immediate danger to life and health situation. A high portion of energy related incidents are caused by inadequate or improper isolation of the energy sources. The causes or contributing factors to these incidents have been:

- Failure to identify or recognize a source of potential or stored energy;
- Inadequate training or competence;
- Inadequate energy isolation systems;
- Complacency;
- Working on, or isolation of wrong equipment;
- Inadequate design and/or maintenance of isolators.
The requirements of the Lower Churchill Project for Energy Isolation include the following:

- Purchase and design of equipment shall be given due consideration to meeting energy isolation standards;
- Isolation shall provide positive protection and be achieved by use of locking devices or the establishment of a physical barrier or separation. All separations or barriers shall be provided by either a permanent or temporary fitted locking device;
- Personal locking devices shall be 1) uniquely keyed, 2) not be of the combination lock type, 3) not have an unauthorized second-party master over-ride key, 4) be kept under the exclusive control of the owning individual and key shall not be transferred from one person to another during the course of the work;
- Designated isolation points shall be clearly labeled at all times to identify the circuit or system over which they have direct control. These labels shall be applied following a process of pre-isolation identification using isolation lists, load verification, marked drawings, etc.;
- Energy Isolation boxes, stations or equivalent shall be provided when required;
- All designated isolations points must be fitted with personal locking devices and shall be tagged. The tags must include the name of the person locking out, the reason for the isolation, the date and time the locking
device was applied and must be highly visible to prevent inadvertent operation.

General Procedures for Energy Isolation include:

- Full compliance with relevant OHS Legislation, regulations and standards;
- A documented Energy Isolation System;
- No work can be carried out on any equipment or system unless it has been established and confirmed that it is in a zero energy state, unless involved with commissioning or troubleshooting;
- The isolation system shall be applied to all activities on the Lower Churchill Project;
- The isolation procedure should determine the appropriate isolation method for any activity (either by way of a full description or by demonstrating the process that shall be followed for new activities);
- Prior to relying on an isolation to supply a safe working environment, documented testing procedures must be provided to verify energy isolation integrity;
- A formal procedure shall be in place for controlling clearances to the work for isolation and de-isolation of equipment, handover and handback of equipment (maintenance to operations), or transfer of isolations between shifts/workgroups;
- Specific procedures shall be developed to address software overrides;
• A procedure for testing and positioning during maintenance and set-up shall be in place;
• A procedure shall be in place to mitigate hazards in special cases where zero energy state, test/try of isolation or use of a locking device are not possible or feasible;
• Formal isolation procedures include requirements for investigation, reporting and removal of personal locks/tags by an authorized person other than the originator. The isolation system must be reviewed regularly and audited to capture any previous unidentified changes and revised when necessary.

Workplace Hazardous Material Information System (WHMIS)

• All contractors will have an established WHMIS program in place for all LCP construction activities;
• All personnel will be trained in WHMIS, including a site specific element;
• All material and containers will be properly labeled;
• Contractors will maintain a complete and up to date set of Material Safety Data Sheets for all controlled products on site.
Environment
Environment

All Nalcor companies will help sustain a diverse and healthy environment for present and future Newfoundlanders and Labradorians by maintaining a high standard of environmental responsibility and performance through the implementation of a comprehensive environmental management system.

Roles and Responsibilities

All project participants have a responsibility for the protection of the environment. Project personnel will:

- Participate in the LCP orientation sessions;
- Be familiar with the environmental mitigation measures specific to their scope of work, as described in the environmental documents;
- Participate regularly in toolbox meetings;
- Report any environmental issues or concerns as outlined in the orientation provided by your supervisor;
- Project personnel are encouraged to reduce/eliminate idling of vehicles where practical.
General Environmental Procedures

Storage, Handling, Disposal of Fuel and Other Hazardous Materials

• All personnel handling fuel and hazardous materials are to be properly trained and informed;
• Fuel may only be stored and transported in appropriate and approved containers;
• Waste products will be properly stored and disposed;
• Fuel and other hazardous materials are not to be poured down drains or permitted to enter the environment in any manner.

Waste Management

• Project personnel are to keep work areas free of food scraps and garbage;
• Project personnel should recycle wherever possible;
• There will be NO littering on site;
• Absolutely NO waste material is to be deposited in any water body.

Water Protection

When working around water bodies Project personnel should:

• Confirm with On-Site Environmental Monitor, proper mitigation measures to be used;
• Report any incidents of failed siltation/soil erosion control structures and incidents of sedimentation of water bodies.

**Wildlife**

There is a wide range of plants and animals found in the project area, some of which are protected or of special concern. Project personnel should be especially aware of rare birds such as the Common Nighthawk, Grey Cheeked Thrush, Rusty Blackbird, Harlequin Duck, and the Olive Sided Flycatcher as well as Raptors and Woodland Caribou.

• Any sightings of these and other wildlife are to be reported to an On-Site Environmental Monitor;
• Any nest sightings are to be reported to an On-Site Environmental Monitor;
• NO personal pets will be allowed on the site;
• Under NO circumstances is wildlife to be fed, chased, followed, diverted or otherwise harassed;
• Any incident that results in the displacement or fatality of wildlife is to be reported to the On-Site Environmental Monitor;
• Project personnel are not permitted to hunt, fish, or trap wildlife, collect firewood or pick berries, whether on or off duty, at any time during their employment within the Project Area at any LCP work site and support
infrastructure. This includes Project related roads, camps, the main work site, the future reservoir area and associated transmission lines. The attached map illustrates the “no harvesting zone”;

• Project personnel conducting activities outside of the Project footprint who are non-resident to the area may only do so while they are off rotation and in compliance with applicable provincial and federal regulations. Project personnel conducting activities outside of the Project footprint who are resident to the area may only do so outside of their normal hours of work and in compliance with applicable provincial and federal regulations;

• This policy will be strictly enforced through corrective action which would include revocation of site access and termination of your employment by your employer, unless there are exceptional mitigating circumstances;

• Harvesting by Labrador Innu within the Project Area is addressed in the Impacts and Benefits Agreement with the Innu Nation.

Historic Resources

Historical resources can include stone flakes; tent rings; burial mounds; tilts; structural frames; arrowheads, tools and fire pits. If an historic resource or artifact is suspected:
• Stop work immediately, **DO NOT** touch or remove artifact;
• Report the find to a supervisor and On-Site Environmental Monitor.

**Spills**

In the event of a spill or leak of hazardous materials (including fuels), site personnel should:

• Act immediately;
• Stop source if possible and safe to do so;
• Contain the spilled products if safe to do so;
• Contact your supervisor or the site; emergency contact, providing as much information as available.
Human Resources
Employment Equity

The LCP team recognizes the importance and benefit of a diverse workforce. Employment decisions concerning the workforce on this project shall be based on individual merit qualifications and competence, and the employment preference provisions in the Lower Churchill Construction Projects Benefits Strategy (Benefits Strategy) and the Impacts and Benefits Agreement (IBA) for qualified Labrador Innu. Nalcor is committed to employment equity and will not discriminate on the basis of race, colour, nationality, ethnic origin, social origin, religious creed, religion, age, disability, disfigurement, sex, sexual orientation, marital status, family status, source of income and political opinion. The profitable, responsible growth and business success of the company, as well as the personal growth of individuals, results from using the abilities of all individuals to the fullest extent practical within the framework of the business environment.

Lower Churchill Construction Projects Benefits Strategy

LCP and the Province of NL have agreed to the projects Benefits Strategy. The overriding objective of this strategy is to provide opportunities and benefits to the people of Newfoundland and Labrador during the
construction of the project. Included in this strategy are hiring protocols for different components and geographical areas of the project. These hiring protocols are also contained in the Labour Project Agreements with our Union partners. A summary of these hiring protocols is as follows:

**Muskrat Falls Generating Facility and associated HVac Transmission System**

For these components of the LCP the priority is as follows:

1. Qualified Labrador Innu as per the terms of the IBA;
2. Qualified residents of Labrador; and
3. Qualified residents of the Island of Newfoundland;
4. Qualified Canadian Residents.

**Island Link HVdc Transmission System**

For these components of the LCP the priority is as follows:

1. Qualified Labrador Innu for the Labrador portion of this component of the LCP;
2. Qualified residents of Newfoundland and Labrador;
3. Qualified Canadian Residents.
The Benefits Strategy also includes an outline for the project’s Gender Equity and Diversity Program. The objective of this program is to address employment Equity for the Project, including access to employment opportunities for qualified members of underrepresented groups. This program will implement programs and practices that contribute to the creation of an inclusive work environment and culture.

The main objective of the Gender Equity and Diversity Program is access to employment opportunities for, and employment of, qualified women and members of underrepresented groups on the project. The program includes a Women’s Employment Plan that provides the necessary resources for an inclusive work environment and corporate culture.

The LCP team recognizes the importance of compliance with the commitments and obligations contained in the IBA with the Innu Nation and the Benefits Strategy. These commitments and obligations are supported by Nalcor’s Human Resources policies and procedures.

IBA initiatives include Innu cross-cultural training for all employees to enhance understanding of the culture of the Innu of Labrador, and social supports for Innu employees, including opportunities for Innu cultural activities.
Labrador Aboriginal Cultural Awareness

Three distinct Aboriginal peoples reside in Labrador: the Labrador Innu, represented by Innu Nation, the Labrador Inuit, represented by Nunatsiavut Government, and the descendants of Inuit and European cultures, represented by NunatuKavut Community Council.

The Labrador Innu are the indigenous inhabitants of an area they refer to as Nitassinan (“Our Land”). The Labrador Innu claim Aboriginal rights and title to a significant portion of Labrador, including the LCP area. In recognition of this, Nalcor negotiated an Impacts and Benefits Agreement (“IBA”) with the Innu Nation and both Innu First Nation communities. The IBA provides certain benefits to the Innu, including first preference for employment opportunities on the project.

Innu reside primarily in the communities of Sheshatshiu (pop. 1700) and Natuashish (pop. 900), which are reserves under the Indian Act. One of the last Aboriginal peoples in Canada to settle permanently, the Innu lived in Labrador as hunter/gatherers for several thousand years until the 1960s when they became permanently settled in communities. The word Innu means “human being” in Innu-aimun, which is the first language of the Innu.
The 6,500 Labrador Inuit call their homeland in northern Labrador “Nunatsiavut.” This means “our beautiful land” in Inuttitut, the traditional language of the Inuit who have lived in Labrador for thousands of years. Labrador Inuit settled their claim for Aboriginal rights and title under the Labrador Inuit Land Claims Agreement, which came into effect in 2005. Labrador Inuit have rights over and/or title to land in Labrador that includes the Inuit communities of Rigolet, Postville, Makkovik, Hopedale and Nain. In addition, many Inuit live in Happy Valley-Goose Bay, Mud Lake and North West River. English is widely spoken by Labrador Inuit, who have had regular contact with European settlers for over 200 years.

NunatuKavut Community Council, formerly known as the Labrador Metis Nation, represents 6,000 descendants of Inuit and European cultures. Members of NunatuKavut live in the southern Labrador communities of Cartwright, Paradise River, Black Tickle, Norman Bay, Charlottetown, Pinsent's Arm, Williams Harbour, Port Hope Simpson, St. Lewis, Mary's Harbour and Lodge Bay, as well as the Upper Lake Melville area.

**LCP Respectful Workplace Standard**

The project is committed to maintaining a safe, healthy and productive work environment where all persons attending LCP worksites are valued.
and treated with respect and dignity. The project has adopted a Respectful Workplace Standard (“standard”) which is intended to support a work environment free of discrimination, harassment, workplace violence and/or threats of workplace violence. All persons engaged in work on the LCP are expected to lead by example to ensure the project is free of discrimination, harassment, workplace violence and/or threats of workplace violence. This standard provides guidelines for Nalcor Energy and its contractors to respond quickly and fairly with any incidents reported under this standard or policy created under this standard.

This Standard supports our Project values:

**Open Communication:** Fostering an environment where information moves freely in a timely manner.

**Accountability:** Holding ourselves responsible for our actions and performance.

**Safety:** Relentless commitment to protecting ourselves, our colleagues and our community.

**Honesty and Trust:** Being sincere in everything we say and do.

**Team Work:** Sharing our ideas in an open and supportive manner to achieve excellence.

**Respect and Dignity:** Appreciating the individuality of others by our words and actions.

**Leadership:** Empowering individuals to help guide and inspire others.
Application of Standard

This standard applies to all employees and consultants of Nalcor, LCP contractors and any other parties engaged in or performing work on LCP worksites.

This standard applies to visitors, vendors, suppliers, contractors and consultants attending LCP worksites.

All contractors working at any LCP worksite are required to have a Respectful Workplace Policy that meets or exceeds this standard. In the event a contractor does not have such a policy, this standard will constitute the contractor’s policy.

Discrimination, Harassment and Workplace Violence

1. Discrimination

“Any action, inaction or behaviour which negatively affects the status of an employee, or the unequal treatment of an employee or harassment on the basis of prohibitive grounds as defined under Human Rights Act, 2010, SNL2010 CHAPTER H-13.1, s. 9 (i) and s. 14 (i) including race, religion, religious creed, political opinion, source of income, color, nationality, ethnic origin, social origin, sex, sexual orientation, marital status, family status, disfigurement, disability, age and
conviction of a criminal offence unrelated to employment.”

2. **Harassment**
   Harassment is any form of conduct that is known or reasonably ought to have been known to:
   a) Create an intimidating, hostile or offensive work environment;
   b) Be objectionable or offensive behaviour that is unwelcome;
   c) Adversely affect an individual’s employment relationship or work performance; or
   d) Deny an individual dignity and self-respect.

3. **Sexual Harassment**
   Any conduct, comment, gesture, or contact of a sexual nature, whether one-time or on a continuous basis that:
   a) Might reasonably be expected to cause offense or humiliation;
   b) Is known or ought to reasonably be known as unwelcome;
   c) Is made to an individual by another individual where the other individual is in a position to confer a benefit on or deny a benefit to, the individual to whom the solicitation or advance is made, where the individual who makes the solicitation or advance knows or
reasonably ought to know that it is unwelcome;

d) Is a retaliation or threat of retaliation against an individual for rejecting a sexual solicitation or advance; or
e) Might reasonably be perceived as placing a condition on employment or opportunity for training, promotion or career development.

4. **Workplace Violence and/or Threat of Workplace Violence**

Any inappropriate physical contact or action, or threat of inappropriate physical contact or action, that would result in pain and/or suffering to individuals. This includes behaviour that would be interpreted by a reasonable person as a substantial threat to harm another person, or endanger the safety or wellbeing of another person, as well as any aggressive or bullying behaviour that is intended to cause emotional or physical distress to a person.

Workplace harassment, workplace related harassment or any other violations of this standard or any policy created under this standard, by any means of communication including but not limited to social media (i.e. Facebook, Twitter, MySpace, Blogging, etc.), email or texting during or outside work hours is strictly prohibited. Any form of workplace harassment, workplace related
harassment or other violation of this standard or any policy created under this standard, may lead to revocation of site access and discipline by your employer up to and including termination.

5. **Examples of Discrimination, Harassment, Sexual Harassment, Workplace Violence and/or Threat of Workplace Violence**

Discrimination, harassment, sexual harassment, workplace violence or threat of workplace violence can take many forms including but not limited to jokes, insults, threats, personal comments or innuendoes. The following are some examples:

a) Posters, pictures, graffiti or derogatory statements;

b) Insults, slurs and negative stereotyping;

c) Threatening, intimidating and hostile acts;

d) Written or graphic material, including email and internet material, that denigrates or shows hostility towards an individual or group;

e) Touching, pushing, pinching, or any unwelcome physical contact including but not limited to physical assault, offensive comments, leering or similar gestures; and

f) Profanity and offensive language; verbal and physical threats or assault;
intimidation; taunting or ostracizing; rude or inappropriate jokes or innuendos; overly aggressive, embarrassing, humiliating or demeaning behaviour; and malicious gestures or action.

6. **What Harassment is Not**

   Examples of what is not harassment or behaviour that does not offend this Standard are the following:
   a) Chit-chat or good-natured jesting when both parties find the conduct acceptable;
   b) An occasional compliment or remark;
   c) Workplace flirtation when it is a voluntary relationship to which neither objects;
   d) Normal exercise of supervisory responsibilities including training, counselling and discipline or a particular supervisory style; and
   e) Personality differences between people

**Individual Responsibility**

All individuals are responsible for:
1. Abiding by this standard or any policy created under this standard;
2. Fostering a respectful workplace where discrimination, harassment, workplace
violence and/or threat of workplace violence is not tolerated; and
3. When encountering behaviour which violates this standard or a policy created under this standard, immediately advise the individual (where possible) that the behaviour is unwelcomed or report the undesired behaviour to a supervisor.

Managers and Supervisors

Managers and supervisors are responsible for:
1. Leading by example to ensure our project is free of discrimination, harassment, workplace violence and/or threat of workplace violence;
2. Implementing or enforcing this standard or any policy created under this standard;
3. Ensuring that all employees they supervise have knowledge of and understand this standard or any policy created under this standard;
4. Ensuring the work environment they supervise is free from discrimination, harassment, workplace violence or the threat of workplace violence and is a respectful workplace; and
5. Taking or assisting in prompt and appropriate corrective action where necessary to ensure compliance with this standard or any policy created under this standard.
Contractor Responsibility

Contractors are responsible to:

a) Have a Respectful Workplace Policy that meets or exceeds this Standard;

b) Make inquiries to determine if the circumstances are such that an informal resolution of the complaint is a potential outcome, and if so to determine if the Complainant will consider attempting to resolve the matter through the Informal Complaint process;

c) Document Informal Complaints and the resolution of Informal Complaints, and provide a copy of documentation to Nalcor Energy, no later twenty-four (24) hours after receipt;

d) Upon receipt of a Formal Complaint, or being made aware of a complaint, the Contractor must determine the following:
   i. if it is appropriate to separate the Complainant and the Respondent’
   ii. have the Respondent off work on administrative leave pending the outcome of the investigation; or
   iii. such other action the Contractor deems appropriate in the circumstances.

e) Report in writing all Informal or Formal Complaints made under this Standard or policy created under this Standard, to Nalcor Energy immediately, including copies of all
statements and other documentation, and no later than twenty-four (24) hours after receipt;
f) Complete investigation, or cause an investigation to be completed by an independent investigator and render a report within seven (7) days of receipt of the Formal Complaint, unless completing the report in this timeframe is not practical;
g) Upon completion of the investigation report, advise Nalcor Energy in writing of the outcome of the Formal Complaint including any corrective action recommended and taken;
h) Provide a copy of the investigation report to Nalcor Energy if requested; and
i) Make available translation services that have been designated by Nalcor Energy for Labrador Innu that are interviewed or required to attend any meeting under this Standard or policy created under this Standard

Complaint Reporting and Informal Resolution

1. Informal Complaint Resolution Option

a) If possible, tell the individual either verbally or in writing, that the behaviour is unwelcome and/or ask him/her to stop immediately following the incident;
b) Report the incident to your immediate supervisor, or a manager or a member of
the human resources department (Labrador Innu workers have the option of reporting any incidents under this standard to the Innu Liaison Coordinator);  

 c) The person making the complaint and the person the complaint is reported to shall keep a written record of the incident(s), including but not limited to date, time, location, witnesses, and what happened;  

d) Have consultation with your immediate supervisor, manager, member of the Human Resource Department or a third-party investigator engaged by the contractor to determine if the matter can be resolved as an Informal Complaint; and  

e) Where the complainant is not satisfied with the outcome of the informal process (as set out in (a), (b) (c) and (d)), or where an Informal Complaint is inappropriate, the complainant may choose to file a Formal Complaint against the Respondent.  

2. Formal Complaint Reporting  

 a) A Formal Complaint may be filed with any of the following:  

• Immediate supervisor;  
• Human resources and/or labour relations manager;
• Any manager of your Employer; or
• Labrador Innu workers may file a complaint with the Innu Liaison Coordinator.

b) The complaint should include:
• Name of alleged harasser(s); and
• Details of alleged discrimination, harassment, workplace violence and/or threat of workplace violence (including dates, times, location, witnesses, circumstances surrounding the complaint, drawings or any other supporting documentation).

c) The complaint should be made as soon as possible, as timeliness in filing the complaint protects the rights of the Complainant and Respondent;

d) Nothing in this standard or policy under this standard, prohibits the individual their right to report the incident to the police or any other form of authority including the Newfoundland and Labrador Human Rights Commission; and

e) The Complainant and Respondent will be made aware of the nature of the complaint and will be given an opportunity to respond as part of the investigation.
3. Reports of Violation of Respectful Workplace Standard by Witnesses

If you observe any incident of discrimination, harassment, workplace violence and/or threat of workplace violence, you are required to:

a) If possible, tell the alleged harasser or person engaging in discriminatory or violent behaviour that the behaviour is inappropriate and ask him/her to stop;

b) Keep a record of the incident(s) (date, time, location, witnesses, details of incident, etc.);

c) Refer the victim of the incident to this standard or any policy of the victim’s Employer created under this standard; and

d) Report the incident to your supervisor, the human resources or labour relations manager, or any other manager of your employer.

Investigation Process
1. Within two (2) days upon receipt of a Formal Complaint, an impartial investigator shall be appointed by a senior management person or representative of the human resources department. Where appropriate, an independent investigator may be appointed to conduct the investigation.

2. The investigator will conduct a thorough and impartial investigation appropriate to the
circumstances and collect evidence, question the involved parties, review documentation and interview witnesses.

3. The investigator will submit an investigation report within seven (7) days of being appointed, if practical, documenting the findings.

4. A senior manager designated by the Contractor will, upon reviewing the report, determine the appropriate corrective action(s).

5. In the case of an investigation report rendered by Nalcor Energy, a senior management person designated by Nalcor Energy will determine the appropriate corrective action(s).

When the disposition of the complaint has been decided, the Complainant and the Respondent are to be informed of the investigation findings and the action(s) taken to resolve the complaint. Where the resolution of the complaint requires disciplinary action against a union person, the union must be provided with a copy of any discipline notation.

Confidentiality
All parties involved in investigations of complaints of discrimination, harassment, workplace violence and/or threat of workplace violence will be treated with the strictest of confidence. Such complaints will be investigated
or resolved with the persons deemed necessary to carry out the investigation. The names of the individuals involved and the circumstances will only be divulged if necessary for the purposes of investigating the complaint, if required by law, or pursuant to Section 4.3 of this Standard.

**LCP Contractor Remedies under this Standard or Policy Created under this Standard**

Appropriate action to be taken by a contractor against any employee found to have violated this standard or a policy created under this standard may include but is not limited to and not necessarily in the following order:

1. Written reprimand;
2. Attendance at Respectful Workplace Training;
3. Attendance at Cultural and/or Gender Sensitivity Training;
4. A suspension without pay;
5. A transfer if the persons involved cannot continue working together; and
6. Termination of employment.

**Nalcor Energy Role and Remedies under this Standard**

Nalcor Energy reserves the right, at its sole discretion, to review or change this standard at any time.
Nalcor Energy, at its sole discretion may in exceptional circumstances, investigate any complaint made under this standard to Nalcor or any complaint submitted to a Contractor under this standard or a policy created under this standard. Should Nalcor Energy conduct an investigation, such investigation does not replace any investigation being conducted by the contractor or relieve the contractor’s obligation to comply with this standard or any policy created under this standard.

Nalcor Energy, upon receiving an Informal or Formal Complaint, completing an investigation or being notified of the outcome of an investigation or corrective actions, may:
1. Temporarily revoke site access;
2. Impose any conditions precedent to granting site access;
3. Permanently deny or revoke site access; or
4. Any other actions Nalcor Energy, in its absolute discretion, deems appropriate.

Frivolous Complaints or Retaliation for Making Complaints

Unsubstantiated/Unwarranted or Frivolous Complaints
Making a false complaint, frivolous complaint or a complaint in bad faith, or knowingly providing false information during a process established pursuant to this Standard or a policy created
under this Standard is prohibited and will result in discipline up to and including termination by the Contractor and may result in site access being revoked temporarily or permanently at Nalcor Energy’s absolute discretion.

**Retaliation**

No one shall discipline, retaliate or take reprisal in any way against anyone who in good faith makes a complaint pursuant to this Standard or policy created under this Standard, or expresses a concern about discrimination, harassment, workplace violence and/or threat of workplace violence, or who has cooperated in an investigation pursuant to this Standard or policy created under this Standard.

Any retaliation against an individual who has made a bona fide complaint is strictly prohibited and any individual who engages in such conduct may be subject to discipline up to and including termination and may have their site access revoked temporarily or permanently at Nalcor Energy’s absolute discretion.

**Work Schedule**

The work schedule for site shall be determined by the contractor in accordance with the Project Labour Agreement, where applicable. The scheduling of the number of days of work in a week, the number of shifts in a day and the
number of hours in a shift shall be at the discretion of the contractor in accordance with the applicable Project Labour Agreement. The work schedules for Innu employees will comply with the terms of the IBA, including flexibility in work schedules and rotation provisions to allow Innu to participate in traditional activities.

**Privacy Policy**

All contractors are to institute systems to protect the personal information of their employees as outlined in the Provincial Government’s Access to Information and Protection of Privacy Act.
Labour Relations
Labour Relations

The LCP is committed to the creation of a positive project culture and terms and conditions of employment that differentiates the project. In partnership with the union all stakeholders will work together to support the Labour Relations Management Plan which provides the framework for achieving high levels of labour productivity, while fostering a respectful work environment, safety, quality, efficiency and respect for the environment. The focus is on fairness in the relationship between workers, contractors and union through open dialogue, equal treatment, consistent enforcement of rules and respect for each other’s requirements.

In partnership with our unions, Project Labour Agreements have been negotiated that support a team based work environment. Adherence to the Project Labour Agreement is expected. This Handbook is not a part of the agreement and no grievances can arise out of this document. You are encouraged to discuss any work related problems or concerns with your supervisor.

Given the large number of employees who will be working on the Project, and to maintain the desired work environment, we have created work standards for site access and related day to day matters.
It is our expectation that contractors will have work rules that meet or exceed the standards listed below.

**LCP Site Access**

Nalcor, as the Owner, has the right to control access to any LCP site. As such, Nalcor, at its sole discretion, may grant or deny access to any LCP site.

**Site Access Card**

All personnel granted site access will be issued a picture ID card. All lost or misplaced ID cards must be reported to the Administration Office immediately. If a replacement card is required, there will be a charge for each replacement. When employees leave the site indefinitely or for extended periods (temporary layoffs) the supervisor must ensure that the employee’s ID card is returned to the Administration Office. If an employee has forgotten or misplaced their ID card, the employee is required to sign in at Security.

**Report to Work Standard**

All personnel must sign in and out on a daily basis at the start and end of the shift, as well as any late start or early departure from the Project.
All personnel must arrive at work in a timely manner such that the employee is ready to go to work at the start of the shift. All personnel must leave work in a manner that reflects a time that is either on or after the conclusion of the work shift.

Personnel are not allowed to sign in or out for one another.

**Attendance Standard**

Personnel are accountable for their attendance and are expected to be at work on time every workday and to complete a full shift. Absenteeism of three or more consecutive shifts without notification or a reasonable excuse will result in revocation of site access and termination of your employment by your employer, unless there are exceptional mitigating circumstances.

**Personal Cell Phones/ Mobile Devices and Internet Usage**

Personal cell phones or other mobile devices are not to be used on LCP work sites.

A recreational internet network will be available in the accommodations complex for use during non-work hours, appropriate restrictions will apply. Nalcor offices will have secure internet connection for business use only.
Use of Cameras

Digital Camera/Video Permits are to be issued to those required to collect photos for work related duties/purposes and can be revoked at any given time by the Project Delivery Team.

This policy applies to all project property locations, including the camp accommodations. Permits are required to be signed by the respective LCP Area Construction Manager or Site Manager and the approval signature for authorization must be obtained by Authorized Project Delivery Personnel. In accordance with the policy, project authorization can be granted by any of the following: Project Site HSSER Manager, Project Site HSSER Coordinator, Project Site Manager (or designate), Project Deputy Site Manager (or designate), Area Construction Manager (or designate).

The Digital/Camera Permit shall be made readily available for presentation to both Security and Project Delivery Team Personnel in order to control unauthorized usage.

Safety/Hazard potential in high risk areas must be taken into consideration while utilizing digital/video equipment on any LCP site.

A designated escort will be responsible for ensuring that digital equipment/camera
equipment is used in accordance with the reason the permit was brought on site.

A progressive disciplinary policy will be enforced upon those who fail to abide by the requirements of this Policy.

All visitors and new employees/contractors are advised of this policy requirement during site orientation. For visitors found violating this policy, it will constitute IMMEDIATE removal from the site. For employees, consultants, etc., a violation will result in a formal report to the supervisor and will be subject to the progressive site disciplinary policy.

**Smoking**

LCP has designated smoking areas for personnel who smoke. All personnel should check with their supervisor and watch the bulletin boards at their location for information on this policy. Whether you are a smoker or non-smoker, respect the rights of your coworkers. All personnel who smoke in non-designated areas may be subject to revocation of site access and discipline by your employer, up to and including termination.

**Control of Firearms**

Personnel are strictly prohibited from possession or use of firearms or other weapons on the site,
even when they possess a legal permit from a governmental body to carry such an item. Weapons may include, but are not limited to, handguns, knives (other than small, personal ones or those used as work tools), explosives and explosive devices and other instruments or materials that could cause harm to another employee, wildlife, or the public. Violation of this standard will result in the revocation of site access and termination of employment by your employer, unless there are exceptional mitigating circumstances.

Counseling and Progressive Discipline Standard

Counseling

Counseling is non-disciplinary and may be utilized by a supervisor when an employee does not meet the expected standard of performance or conduct established by the Contractor or for the Project. This non-disciplinary counseling is to ensure the employee is made aware of what is expected for a standard of performance or conduct and to give the employee the opportunity to modify the behavior. In addition, any counseling will make it clear that similar conduct or behavior may result in discipline up to and including termination.
Progressive Discipline

Progressive discipline may be utilized by a supervisor after an employee has received counseling and the conduct or behavior continues or when the severity of an incident warrants discipline in the first instance.

Discipline is normally carried out in progressive severity and is intended to correct behavior while acting as a deterrent.

The following is the typical sequence of progressive discipline:

**Verbal Disciplinary Warning** – to be recorded by a contractor and noted in the employee’s personnel file; issued when the infraction is of a minor nature and is either the first occurrence of unacceptable behaviour or first occurrence after the employee has been counseled. The employee is to be provided a written confirmation of the verbal disciplinary warning.

**Written Disciplinary Warning** – issued where the first infraction is of a relatively minor nature. It may be a first occurrence of unacceptable behaviour or it may have been brought to the attention of the employee previously, through counseling or through a verbal disciplinary warning.
Suspension – issued when the infraction is of a serious nature, even though it may be the first occurrence;

The infraction is of a minor nature but is a continuation of unacceptable behavior, after a written and/or verbal disciplinary.

Termination – issued when the infraction is of such a serious nature that employment cannot continue;

The infraction is a final incident in a series of infractions that have been dealt with through one or more steps of progressive discipline.

Factors to Consider:

The steps of progressive discipline may be jumped or accelerated or delayed based on the following:

- Length of service;
- Past record;
- Severity of the infraction;
- Attitude of the employee;
- Previous corrective action record;
- Other mitigating factors, i.e., provocation.

Investigation – When a supervisor observes or is made aware of conduct or behavior of an employee that does not meet the accepted
standards of performance or conduct established for the project, the supervisor or a contractor/manager will:

- Conduct an initial investigation of the incident to gather all of the facts. The investigation may include an opportunity for the employee to provide the facts as the employee sees them. It should also provide an opportunity for the employee union representative, when requested to be involved;

- Innu employees will also have the access to support of the Innu Liaison Coordinator and other supports provided for in the IBA.

After the Contractor’s supervisor has gathered information on the circumstances surrounding the infraction and reviewed the personnel file, the supervisor will communicate the level of discipline to the employee, including a copy of the written documentation.

**LCP Site Work Rules**

For all individuals working on the site, a basic set of rules have been developed to govern daily activities. While various rules are listed throughout the Handbook, particular attention should be paid to the violations listed below, which will lead to the denial or revocation of site access and termination of your employment by
your employer, unless there are exceptional mitigating circumstances.

The following list provides examples and is not exclusive:

- Violation of safety absolutes;
- Disregard for safety rules;
- Non-compliance with the Lower Churchill Project Drug and Alcohol standard, including but not limited to:
  - Reporting for work under the influence of alcohol or illegal drugs;
  - Possession of alcohol, illegal drugs or illegal drug paraphernalia;
  - Distribute, sell or attempt to sell drugs or illegal drug paraphernalia, or engage in unauthorized distribution, offering, or sale of prescription medication;
  - Refusing to submit to a requested just cause or post incident drug and alcohol test;
- Willful damage to equipment;
- Tampering with Safety Devices or Emergency Response Equipment;
- Working without a Construction Specific Permit. (Confined Space Entry, Excavation, Leading Edge/ Open Hole, etc.);
- Theft of property;
- Deliberate falsification of statement, reports or records;
- Failure to submit to requested searches
(vehicles, packages and/or personal baggage, including lunch boxes, entering or leaving the Site);

• Fighting or assault;
• Card swiping in or out for another individual and time card theft;
• Sleeping on the job during work hours;
• Possession of firearms, lethal weapons, ammunition or explosives on the site;
• Insubordination;
• Absenteeism of three (3) consecutive shifts without notification;
• Serious harassment, sexual or any other form.

The following are examples that may lead to revocation of site access and discipline by your employer up to and including termination:

• Hunting, fishing, trapping, collecting firewood or picking berries, whether on or off duty, at any time within the project area at any LCP work site and/or support infrastructure;
• Personal cell phones or other mobile devices, unless authorized;
• Abusive language, verbal threats, or intimidation of any employee;
• Failure to report job related injuries or illnesses.
11.0 Attachments
Harlequin Duck

Rusty blackbird
Osprey

Olive-sided flycatcher

Caribou
Acknowledgement Form

I have been provided with a copy of the LCP Site Handbook and understand that I am required to read the Handbook and am required to comply with the safety absolutes, rules and other requirements contained in the Handbook.

Signature: ______________________________

Printed Name: __________________________

Date: _________________________________

Office Location: ________________________

Signed original is to be retained by the Training Department.