



Manpower Alberta Safety Policy & Guidelines for Associates

Every Manpower Associate is required to read this guide and sign the Incident/Injury Reporting Agreement

What do you do?



Manpower®

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INTRODUCTION

This is your personal copy of Manpower's Health & Safety Guide for Associates. It explains Manpower's Safety policies, general safety rules, your rights, information about workers' compensation insurance benefits if you are injured on the job, modified work program, and much more.

You have the following rights under this program:

- To be advised on occupational safety and health hazards and to receive training about safe work conditions, practices and personal protective equipment. Job site safety training will generally be handled by the client to whom you have been assigned.
- To provide information to Manpower about safety hazards or concerns, and to request information or to make safety suggestions without fear of reprisal.

You have a duty to comply with the following requirements to make the workplace safe for yourself and your fellow Associates. You must:

- Learn and understand the safe practices for the general work area and your job.
- Comply with the client safe work practices and personal protective equipment for your job
- Report all unsafe work conditions to your onsite supervisor and your Manpower Representative immediately.
- Notify your Manpower Representative of any changes to you job duties that differ from the ones you were sent to perform at the client location.

It is our sincere hope that you will never be injured. If you are injured, however, we want you to receive the best care without delay. If you delay in reporting an injury we cannot do our part. Report all accidents immediately to you job site supervisor and Manpower Representative. Report the accident, even if medical treatment is not necessary. Every Manpower Associate is required to acknowledge this understanding by signing the Incident/Injury Reporting Agreement.

In the case of an emergency after regular business hours, you can contact us at: **1.844.4BE.SAFE (1.844.423.7233)**

Please read this entire Guide carefully and refer to it whenever you have a question. It is dedicated to helping you work safely on the job.

If a question is not answered in this Guide, or if you have any additional questions, your Manpower Representative is always available to assist.

Manpower Alberta Health and Safety Policy Statement

At Manpower, people are what matters most! Safety is Everybody's business!

There is no part of our business or the company's operation that is more important than the well-being of People. This includes our employees, associates, contractors, visitors, neighbours, and all people in our community. We are committed to meet and then exceed Alberta's WorkSafe and Certificate of Recognition standards. This includes all opportunities to promote safety and the well-being of people in our industry. Everyone is responsible and accountable for achieving safety excellence through participation. All Manpower team (all categories – including management, non-management, contractors, and associates) shall be aware of and meet or exceed regulatory requirement. This Policy Statement and all the policies that support this Statement are intended to focus on competency, excellence in communication, establish our commitment and set the foundation for continuous improvement of our programs. The objectives of our program include:

- **COMPLIANCE and COMPETENCY** –We are committed to meet, and when possible exceed, the *Alberta Occupational Health and Safety Act, Regulation and Code*, as well as other applicable legislation. Each and every individual is responsible for knowing legislation (including regulation and codes), policies, programs, procedures and practices. Manpower undertakes to provide a robust program of continuous learning and educational opportunities, to support individuals to act in compliance with all expectations. We establish the competency of each individual through review of their actions. Knowledge sharing is the first step. Evaluation of actions and behaviors is the second. Individual continuous improvement is achieved through ongoing training and development opportunities. Manpower management program continuous improvement will be achieved through annual review/audit as well as system maintenance.
- **OBSERVATION** - within the scope and role of providing staffing, Manpower shall take all steps to minimize worker exposure to the risks associated with employment. We accomplish this by understanding and knowing the work environments that are under our direction and control. In addition, we undertake ongoing review of the work environments where our Associates and Independent contractors will complete their usual work activity. Our program to ensure annual review of worksite shall be enforced.
- **ORIENTATION** - all employees, associates and contractors shall be oriented, providing them with the information required to complete their work activity safely. On worksites under the direction and control of Manpower, this shall include full site orientation. For sites where employees, associates and contractors may work, we will establish with our Client/Partner the standards that will apply, that shall be in keeping with the standard established by our policy.
- **COMMUNICATION** – Health, safety and employee/associate/contractor well-being is our first priority. We shall communicate and share this information with all employees, associates, contractors, visitors, and client partners. We will maintain and communicate our role as an industry leader by exceeding the highest standards in all circumstances. Our senior leadership shall undertake to directly communicate regarding our health and safety management system within each calendar year.
- **VALUES** - our health and safety system reflects our corporate global values. People, Knowledge, and Innovation will be adopted as primary motivators for all health and safety management systems, policies and practices.

It is our belief that all injuries are preventable!

Dated – January 1, 2018



Randy Upright, Chief Executive Officer

EMPLOYEE/WORKER SAFETY TRAINING POLICY

Manpower recognizes that accidents are not caused only from unsafe conditions. In many circumstances, they are as a result of unsafe actions or the use of unsafe practices. The direct cause of an event (incident or accident) can often be attributed to inadequate or improper training.

Manpower is responsible for general orientation for Associates/field employees. The fundamental responsibility for training of a field employee (Associate) rests with Manpower's customer. Based on the nature of this industry, employees may be hired to complete activities under the direction, supervision, and control of Manpower's customers or may have shared supervision (co-employment). Working effectively with client partners to ensure a complete understanding of those responsibilities shall be effectively communicated, prior to the commencement of work activity.

We recognize that legislation identifies the employer's responsibility. However, noting that Manpower does not control the worksite, Manpower fulfills obligations to this policy through appropriate communication and understanding between Manpower and Manpower's client partner.

HEALTH AND SAFETY VISION

Employer Commitment and Responsibility

Manpower is committed to providing a safe and healthy working environment for its temporary and permanent employees. We are committed to preventing occupational illness and injury in the workplace. Concern for our employees' health and well-being is a top priority at all levels.

This commitment includes the implementation of a safety program that defines key safety rules, the roles and responsibilities of management and employees, and procedures to ensure that working conditions are safe.

Manpower will also abide by all safety regulations and guidelines set forth in applicable legislation.

Your Rights:

There are 3 basic rights:

1. **Right to Know** - all employees have the right to know the hazards in their job. Manpower will make sure that you are provided with the information you need so you can work safely.
2. **Right to Participate** - all employees have the right to take part in keeping the workplace healthy and safe.
3. **Right to Refuse** - if you believe the job is likely to endanger your health and safety, you may refuse to do it based on specific requirements.

HEALTH AND SAFETY RESPONSIBILITIES POLICY

Manpower believes that “Safety is Everybody’s Business.”

Every individual working for and with Manpower (includes Manpower permanent staff and Associates), and all contractors are responsible for their safety, the safety of all workers on client work sites, and visitors.

Applicable Legislation:

The Alberta *Occupational Health and Safety Act* (Revised Statutes of Alberta 2000, Chapter O-2 – current as of May 24, 2006) identify two categories of responsibilities. In Alberta, the health and safety responsibilities of the employer are defined by section 2(1), which states:

- 2(1)** *Every employer shall ensure, as far as it is reasonably practicable for the employer to do so*
- (a) the health and safety of*
 - (i) workers engaged in work of that employer, and*
 - (ii) those workers not engaged in the work of that employer but present at the work site at which that work is being carried out, and*
 - (b) that the workers engaged in the work of that employer are aware of their responsibilities and duties under this Act and the regulations and the adopted code.*

In Alberta, the health and safety responsibilities of workers are defined by section 2(2), which states:

- 2(2)** *Every worker shall, while engaged in an occupation,*
- (a) take reasonable care to protect the health and safety of the worker and of other workers present while the worker is working, and*
 - (b) co-operate with the worker’s employer for the purposes of protecting the health and safety of*
 - (i) the worker,*
 - (ii) other works engaged in the work of the employer, and*
 - (iii) other workers not engaged in the work of that employer but present at the work site at which that work is being carried out.*

Further responsibilities for workers are defined by section 14(1) of the Regulation (62/2003), which states:

14(1) *A worker who is not competent to perform work that may endanger the worker or other must not perform the work except under the direct supervision of a worker who is competent to perform the work*

(2) *A worker must immediately report to the employer equipment that*

(a) is in a condition that will compromise the health or safety of workers using or transporting it,

(b) will not perform the functions for which it is intended or was designed

(c) is not strong enough for its purpose, or

(d) has an obvious defect

(3) *If a regulation of an adopted code imposes a duty on a worker,*

(a) the duty must be treated as applying to circumstances and things that are within the worker's area of occupation and responsibility, and

(b) the worker must perform that duty.

Based on the applicable legislation, Manpower recognizes that **workers** are responsible for, but not limited to the following:

- lead by example,
- become aware of and work in compliance with provincial health and safety related legislation, including the Alberta *Occupational Health and Safety Act (including associated Regulation(s) and Code(s))*.
- report any unsafe work practices to Manpower,
- report any event to Manpower within one (1) hour of occurrence,
- take steps to remedy unsafe work practices, hazardous or unsafe work conditions, when it is possible to do so safely,
- cooperate with all training initiatives,
- use all provided safeguards, including personal protective equipment or other devices designed to protect from injury,
- advise when safeguards, including personal protective equipment or other devices designed to protect from injury, are required,
- provide all information when an event investigation is being completed,
- participate in event investigations,
- remove from service any tool or equipment that has not been maintained or becomes damaged,
- do not operate any equipment that has been locked or tagged out,
- do not perform maintenance on any equipment that has not been locked out in accordance with the manufacturer and client's instruction, and
- take all necessary steps to promote the safety and health of all workers and visitors.

Based on the applicable legislation, Manpower recognizes that **sub-contractors and independent contractors** are responsible for, but not limited to the following:

- contractors and sub-contractors are considered to be workers under this policy and therefore must comply with all responsibilities outlined in this policy for workers,
- based on the severity of the infraction, the contract (including verbal, written, or implied) may be revoked,
- contractors must present evidence of all applicable Workers' Compensation Board coverage (for all employees and owner operators),
- contractors must conduct themselves and direct and coordinate their workers in cooperation with all policy, management direction, and client/customer direction,
- contractors must provide their workers with required personal protective equipment and ensure competent use of same, unless otherwise specified,

WORKPLACE VIOLENCE, DISCRIMINATION, AND HARASSMENT POLICY

Workplace Violence

Manpower subscribes to a **zero tolerance standard** related to workplace violence. This means that acts or threats of physical violence, including any form of intimidation, harassment, and/or coercion involving Manpower or its employees or customers/clients (including customer/client employees), when it occurs in connection with employment with Manpower **will not be tolerated at any time**. Workplace violence shall be considered as a hazard of employment.

An employee, who reports an injury or adverse symptom resulting from workplace violence or is exposed to workplace violence, will be referred/requested to consult a health professional of the worker's choice for assessment and treatment.

Discrimination and Harassment

Manpower is committed to a healthy, harassment-free work environment for all employees. Manpower had developed a companywide policy intended to prevent harassment of any kind (including sexual harassment) and to manage any incident that may occur.

All harassment is offensive and in many circumstances intimidates others. For this reason, no form of harassment will be tolerated. Employees who breach this policy shall become subject to corrective action.

DRUG AND ALCOHOL POLICY

Manpower is committed as a matter of policy to having a productive work environment that is free from unauthorized, prohibited, illegal or controlled substances, including alcohol, drugs, and other illegal or restricted chemicals.

It is recognized that inquiring about, or testing for, a condition that is a physical and/or mental disability is allowed only where it is a legitimate occupational requirement of a particular job. Alcohol or drug addiction is a physical and/or mental disability. Discrimination based on physical and/or mental disability is prohibited by the Alberta Human Rights, Citizenship and Multiculturalism Act and Canadian Human Rights Act.

Because involvement with substances of abuse (i.e., alcohol, drugs or chemicals) does compromise employee safety, public safety, environmental safety, the security of Manpower operations and takes its toll on job performance and client's interest. Manpower expects Associates to perform their duties safely and efficiently. Manpower encourages Associates with a substance abuse problem to seek assistance through a substance rehabilitation program. The rehabilitation affords an opportunity for assistance on a confidential basis or through performance referral.

This policy may be applied when client needs meet the standards established by the Alberta Human Rights and Citizenship Commission. All efforts to ensure that there are bona fide occupational requirements for testing shall be considered before requirement for participation in this policy.

YOUR JOB ASSIGNMENT RESPONSIBILITIES

When you are offered an assignment with a client, you will be provided with a job outline and provided with job hazard analysis and control information to help you work safely. If you arrive at the job assignment and the job description has changed, **call your Manpower Representative immediately!**

Every Associate needs to know and understand the following:

- No Associate is expected to undertake a job until he or she has received on-site instructions on how to do it properly and has been authorized to perform that job
- No Associate should undertake a job task that appears to be unsafe for any reason
- You are expected to report to Manpower **all unsafe conditions** encountered during your work
- Mechanical safeguards (machine guards) must never be removed and must be in place at all times. Machinery shut down for repair or maintenance must be **locked out or tagged out** appropriately. Check with your job-site supervisor for instructions.

ASSOCIATE SAFETY PARTICIPATION, RESPONSIBILITY & CODE OF SAFE PRACTICE

It is your duty to know and follow all of Manpower's safety rules and procedures, as well as all of the client's job site safety rules and procedures. Each employee has specific responsibilities to ensure safety on the job. These include:

- Knowing your job responsibilities and always following job-site rules and safe work practices.
- Recognizing the hazards that may be present on the job and taking precautions to ensure the safety of yourself and others.
- No employee is expected to undertake a job until he or she has received on-site instructions on how to do it properly and has been authorized to perform that job.
- No employee should undertake a job task that appears to be unsafe for any reason.

- Actively participating and cooperating in the overall safety program of Manpower and the client.
- Using the worksite first-aid facilities when necessary.
- **In the event of an injury, reporting it immediately** to the worksite supervisor and to your Manpower Representative **within one (1) hour** from the time of occurrence.
- Using all personal protective equipment provided by Manpower and/or the client.
- Being alert to see that all machine guards and other protective devices are in place and properly adjusted. Report deficiencies promptly to the job-site supervisor or to Manpower.

Manpower Code of Safe Practices

This code is general in nature and covers many types of business activities:

- All Associates will follow job-site safety rules and report all unsafe conditions or practices to their job-site supervisor and Manpower Representative.
- Manpower Representatives will insist that Manpower Associates observe and obey all rules, regulations and directives required to achieve safe work conditions. They will take action necessary to obtain compliance.
- Anyone known or suspected to be under the influence of alcohol, drugs and/or any illegal or controlled substances will not be allowed on the job while in that condition.
- No Associate will knowingly be permitted or required to work while their ability or alertness is impaired by illness or other causes that might unnecessarily expose that individual or others to injury
- Horseplay, practical jokes, scuffling and other acts that tend to endanger the safety or well-being of coworkers is prohibited
- Work will be supervised to prevent injuries when working with equipment and when handling heavy materials. When lifting heavy objects, Associates should use proper lifting techniques
- Workers will not handle or tamper with any electrical equipment, air or water lines, or machinery in a manner not within the scope of their assigned duties, unless they have received **authorization** and **instructions** from their worksite supervisor and Manpower.

HEALTH AND SAFETY COMMITTEE POLICY

Manpower's Health and Safety Committee is an integral aspect of developing and implementing injury prevention strategies and reviewing accidents and incidents. The committee is responsible for promoting and coordinating the health and safety of workers of Manpower. The committee shall be comprised of individuals who work in Manpower's offices.

Manpower will also work with client/customer health and safety committees that are voluntary and those that have been ordered by the Minister under the provisions of section 31(1) of the *Occupational Health and Safety Act*. It is recognized that Part 13 of the Occupational Health and Safety Code does not apply to Manpower, but is followed on a voluntary basis only.

HEALTH & SAFETY BULLETIN BOARDS

Every Manpower office maintains a Health & Safety Bulletin Board. This board provides important safety information such as:

- Provincial Occupational Health & Safety Act, Code and Regulations
- A copy of our Emergency Evacuation Plan
- Emergency Phone Numbers
- First Aid Policy
- Certified First Aid individuals
- The Names and Contact information of the Manpower locations Health & Safety Representative and/or Committee Member (where applicable) and;
- Other postings that we think you will find informative and will help keep you safe.

We encourage you to review the bulletin board before leaving the office today, and every time you visit our office.

FIRST AID POLICY

The intent of this policy is to provide specific information, to ensure a clear understanding of the standards that govern first aid at Manpower office locations and client/customer field sites.

It is mandatory that Manpower have certified first aiders, first aid services and supplies available in office environments, in accordance with the legislation. Because Manpower does not control the work sites where Associates will perform their occupation, Manpower will be responsible for the audit of these sites (refer to Work Site Inspection section in this manual).

On client/customer field sites, the owner of the site shall be considered the prime and the expectations of the employer, shall be clearly communicated by Manpower to be an obligation of the prime (client/customer), unless otherwise agreed by the parties.

It is the responsibility of each Branch Manager or assigned designate to ensure compliance with the First Aid standards for training and supplies. This will be reviewed on a monthly basis, through the Manpower Office Evaluation Report (refer to Work Site Inspection section of this manual).

WHMIS POLICY

Workplace Hazardous Materials Information System (WHMIS) is designed to ensure that people who handle hazardous materials at Canadian workplaces have the information that they need to work safely with those products. WHMIS has three major objectives:

- Protect workers by providing information about hazardous materials,
- Set standards that are Canada wide for the provision of hazardous information, and
- Keep genuine trade secrets from being revealed

No controlled products shall be stored at Manpower's office locations.

All field employees/Associates shall receive an orientation regarding the WHMIS system, regardless of expected placement. As a part of our worksite inspection program,

Representative's and other Manpower employees who visit field work sites for the purpose of evaluation, shall ensure that a representative sample of products examined do have appropriate labeling and accompanying material safety data sheets. Should controlled products be transferred from the original container into another container shall check that workplace labels are affixed to the containers. The client will also ensure that MSDS are readily available to employees. This will ensure that Manpower's client/partner have fulfilled the obligations imposed by section 395(2) of the Occupational Health & Safety Code (2009). In addition, a review of the process that will be followed by the client to ensure Manpower's employee is made aware of safe storage, use and handling of the controlled product and emergency procedures to be followed, shall be reviewed prior to the placement of an employee on any work site.

Manpower will not place an employee on a worksite where this standard is not enforced.

EMERGENCY RESPONSE POLICY

Manpower recognizes that many of their field employees will work on client/customer worksites governed by a site-specific plan. In those circumstances, the site-specific emergency preparedness and response will take precedence over this policy.

The purpose of this plan is to outline the emergency preparedness and response at Manpower that applies to our office environments and sites under the direction and control of Manpower.

The purpose of this policy is to ensure that both human and physical assets are protected and losses eliminated, in the event of an emergency situation.

An emergency is a situation that is sudden and unforeseen and may include (but is not limited to):

- Fire;
- Explosion;
- Chemical release and/or spill;
- Serious injury or fatality;
- Dangerous weather conditions;
- Bomb threats;
- Power failure;
- Gas leaks;
- Motor vehicle accidents;
- Water damage from overhead sprinklers;
- Violence or threat of violence.

All employees are responsible for ensuring that Manpower's Emergency Response procedures are followed. Senior Management is responsible for establishing policy and providing written documentation. Supervisors and Managers are responsible for communicating all information to staff.

WORK SITE INSPECTION POLICY

Manpower is committed to the health and safety of employees/Associates through review of sites where work may be performed. Based on the nature and diversity of work that is requested by Manpower's customers, it is recognized that Manpower cannot be responsible, nor be able to control the work site where an employee/Associate may be requested to perform work. Manpower's Associates are under the direction and control of Manpower's customer. Manpower will, however, take steps to be aware of the hazards and risks that are associated with a customer's work site.

The Alberta Industrial Work Environment Summary shall be completed prior to the commencement of an assignment. The Alberta Office Work Environment Summary may be completed within five (5) business days of the order start date or prior to the placement of a worker in accordance with the standards established by the Predictable Performance System. If a worksite is in a remote location which is a distance of greater than 50 kilometers from the office then a Work Environment Summary is not expected to be completed. If we are employing a large workforce at a location 50 kilometers or further from the office then a Work Environment Summary would be expected to be completed. This is a responsibility of the Manpower Representative who places an Associate and regular review of this expectation shall be completed by the responsible Supervisor/Manager. Industrial and Office Work Environment Summary documents shall be further reviewed on a bi-annual basis by the responsible Manpower Representative.

A Work Environment Summary shall be required in accordance with Manpower's Predictable Performance System standards should there be an interruption in services of one (1) year or greater.

A Manpower monthly office evaluation report shall be completed for all offices under the direction and control of Manpower on a monthly basis. This responsibility shall be assigned by the Chief Executive Officer and/or his/her designate. A summary of observation and action follow up shall be maintained on a monthly basis.

What you should do:

When you begin an assignment, you should be made aware of the following things at a minimum. If a client does not share these things with you, you should proactively ask your site Supervisor and notify your Manpower Representative before starting the work to be performed. Find out about:

- The Visitor/Sign In procedures
- Where to locate the Health & Safety bulletin board
- The Client site Emergency Evacuation procedures and phone numbers
- Where to locate MSDS sheets where applicable
- Lock Out Policy and Procedures
- PPE Requirements and Receive Training on how to use and care for them
- First Aid Station/Room and Certified First Aiders
- Hot Work Policy and Procedure where applicable
- Operator Pre-Use Inspection Policy or Process where applicable
- Any Safe Operating Procedures or training specific to your role

JOB HAZARD ANALYSIS POLICY

The intent of this policy is to provide specific information, to ensure a clear understanding of the standards that govern Job Hazard Analysis in Manpower's offices and at client sites.

It is recognized that accidents will be eliminated through the process of establishing and reviewing the job hazard analysis when all events and injuries have occurred.

To fulfill Manpower's commitment to all applicable legislation, regulation and code, Manpower shall gather and adopt Job Hazard Analysis documents from client/customer partners, in accordance with section 7(2) of the Alberta Occupational Health and Safety Code. This standard will be applied to all existing and new work activity in the Alberta region.

Manpower Representatives shall be responsible for reviewing the identified hazards and control/elimination methods identified before an employee or Associate assignment begins. Controls for hazards include engineering, administrative, and PPE. These documents shall be utilized in discussion with candidates for employment to ensure they are aware of all hazards and the expected control methods.

Manpower does not direct, manage or maintain Job Hazard Analysis for client/customer field sites where work is completed. It is Manpower's responsibility to ensure that client/customer partners have fulfilled their legislative obligations by reviewing the job hazard analysis documents prepared and enforced by the client. This process must occur before Manpower's employee/Associate commences work activity. For audit purposes and to prove due diligence, these documents shall be retained and filed in the customer file located in each field/branch location.

Only in the circumstance when a written report has not been prepared by the client/customer may Manpower review from its database of completed Job Hazard Analysis documents an appropriate written summary of job steps, hazards, and controls with the customer/client. If it is determined that an appropriate document does not exist, then Manpower and Manpower's customer/client shall be required to complete a Job Hazard Analysis document. Manpower's standardized template may be utilized for this purpose.

HAZARD REPORTING

The purpose of this policy is to outline a procedure to follow when reporting hazards.

By identifying safety hazards, Manpower is increasing your knowledge of the hazards that may exist in the workplace and will help to determine the safest way to work. By acting proactively, Manpower's goal is to prevent future accidents.

Defining hazardous conditions and acts

A hazard is anything that has the potential to cause damage, harm or adversely affect one's health. Examples include but are not limited to:

- An object that could fall from a height.
- Spills or other slip or tripping hazards.
- Faulty equipment (e.g. where there is the potential for entanglement of hair or clothing in equipment).

- An unsafe act is a behavior which could lead to an accident/incident (e.g. using equipment in an unsafe way or careless manner; not using personal protective equipment).
- Any changes in the workplace which workers feel are a potential hazard or risk.

Reporting and Follow-up Procedures

If a worker perceives or feels that there is a hazardous condition or act in the workplace, the following steps should be taken:

- Immediately advise your supervisor at the client site. Communicating directly with the supervisor at the workplace, will ensure quick and immediate response. It will also avoid putting other workers at risk.
- You shall then communicate with a Manpower representative to inform them of the situation.
- Your Manpower representative will provide you with an Event Recording and Investigation Form, which you shall complete and return to your Manpower representative. If you require assistance in completing this form, please ask your Manpower representative.
- A Manpower representative will review the Event Recording and Investigation Form immediately and work with the following resources to ensure your safety.
 - Key client contacts such as Health and Safety representatives, supervisors/managers, human resources, etc.
 - Health and Safety Representative or Joint Health and Safety Committee member
 - Health and Safety Coordinator
 - Risk Manager
- If it is impossible to correct the hazardous situation, the situation will be reviewed by either the Manpower work location Manager and/or Health & Safety Representative with Human Resources at Manpower and Risk Management to determine the next steps following our Event Recording and Investigation Policy.

Your Responsibility is to:

- Immediately report to your on-site supervisor the existence of any hazard of which he or she is aware.
- Immediately report the existence of these hazards to your Manpower Representative.
- Assist in the control of the hazard as possible.

RIGHT TO REFUSE UNSAFE WORK POLICY

Manpower has created a Right to Refuse Unsafe Work Policy and step-by-step process regarding your right to refuse work. Manpower requires that any Associate or employee exercise all rights and obligations to refuse any work activity if they:

- believe that there exists imminent danger to the health and safety of that worker or other workers,
- are carrying out any activity that could cause imminent danger, or
- operate any tool, appliance, or equipment if he believes it will cause imminent danger to himself or any other worker

This policy, though based on Alberta Legislation, applies to Associate's undertaking their occupation across Canada. Because some Manpower Associates may complete their occupation in other jurisdictions, the standards of this policy will be applied to all regions where Manpower may have workers engaged in their occupation.

All workers will be advised of the Right to Refuse Unsafe Work during new hire orientation and ongoing annual refresher for all Associates/employees.

Everyone is entitled to work in a safe environment and under safe conditions. Under no circumstance would employment be jeopardized, should a Manpower Associate/employee refuse to perform a job task/activity reasonably believed to represent imminent danger.

Refusal to work

You may refuse to work or do particular work where you have reason to believe that:

- (a) Any equipment, machine, device or thing you are to use or operate is likely to endanger yourself or another worker;
- (b) The physical condition of the workplace or the part thereof in which you work or are to work is likely to endanger you; or
- (c) Any equipment, machine, device or thing you are to use or operate or the physical condition of the workplace or the part thereof in which you work or are to work is in contravention of applicable provincial health & safety legislation and such contravention is likely to endanger you or another worker.

No worker may exercise his right to refuse if his refusal to perform the work puts the life, health, safety or physical well-being of another person in immediate danger or if the conditions under which the work is to be performed are ordinary conditions in his kind of work.

Basic steps when claiming your right to refuse work:

- Promptly report the situation to your immediate client supervisor and your Manpower Representative.
- The client supervisor and your Manpower Representative will immediately investigate the circumstances. You must remain in a safe place near your workstation during the investigation.
- If it is determined that it is not a dangerous situation or the situation has been controlled, you may then resume your work duties. A report of the circumstances is provided to Manpower's Health & Safety Representative.
- If steps were taken to deal with the situation and you continue to feel that the work is unsafe, there are particular circumstances in which you may refuse to do that particular work. In these circumstances, the appropriate provincial government body may be called in to review the situation in accordance with that provinces legislation.

MATERIAL MANAGEMENT POLICY

Manpower does not own or control any powered mobile equipment or other material management equipment or use on a customer/client worksite. Manpower Associates do, however, conduct their work activity on client/customer worksite, where material management equipment is available.

A Manpower worker may only be permitted to utilize this equipment to perform their occupation when they have received adequate site-specific client/customer initiated training. In those circumstances, the worker is under the direction and control of the client/customer. Manpower workers are not permitted to use powered mobile equipment, without client/customer direction and authorization.

In circumstances where training, including certification is requested, Manpower will engage the services of a third party provider, determined by Manpower to be competent in the training of workers related to use of material handling equipment.

Because certification training is not a provincially mandated standard, Manpower's Associates use of equipment will be mandated by the Occupational Health and Safety Code.

MANAGING THE CONTROL OF HAZARDOUS ENERGY POLICY

It is recognized that whenever machinery, equipment or powered mobile is to be serviced, repaired, tested, adjusted or inspected at a customer/client site, it is a requirement that the customer/client have in place a program related to the control of hazardous energy. The customer/client shall be responsible solely for ensuring that the hazardous energy has been controlled in accordance with Part 15 of the Occupational Health and Safety Code.

This policy is in place to ensure that the standard utilized by the client meets or exceed the expectations of this policy.

Hazardous energy is defined in Part 1 of the Alberta Occupational Health and Safety Code as the following:

“hazardous energy” in Part 15 means electrical, mechanical, hydraulic, pneumatic, chemical, nuclear, thermal, gravitational, or any other form of energy that could cause injury due to the unintended motion, energizing, start-up or release of such stored or residual energy in machinery, equipment, piping, pipelines, or process systems;”

Any Associate placed by Manpower involved with the servicing, repair, testing, adjusting or inspection, of machinery, equipment or powered mobile equipment must be provided with site specific training by the client related to the control of hazardous energy. It is Manpower's responsibility to ensure that those Associates will be supervised by a worker determined to be competent and that all training shall be documented and retained by the client.

In addition to a comprehensive program to control hazardous energy, the client must also have Job Hazard Analysis documents completed, in accordance with Part 2 of the *Alberta Occupational Health and Safety Code*. Manpower will not provide standardized template documents, nor complete Job Hazard Analysis when it involves the customer/client's obligations to provide control of hazardous energy.

TRANSPORTATION OF DANGEROUS GOODS (TDG) POLICY

Manpower will comply with the requirements established by Section 19 of the *Dangerous Goods Transportation and Handling Act* to ensure that no person shall handle, offer for transport, transport or import any dangerous goods, unless they are trained to work in compliance with all applicable prescribed safety requirements, understand the applicable prescribed documents, and the appropriate means of containment and transport complies with applicable safety standards and provides applicable prescribed safety marks.

PERSONAL PROTECTIVE EQUIPEMENT POLICY

Manpower recognizes that certain work and/or work sites require the use of Personal Protective Equipment (PPE).

Manpower is committed to the health and safety of workers through mandatory use of personal protective equipment (PPE), when it has been determined that an engineering or administrative control is not effective.

Manpower will determine the need for PPE through completion of the Industrial Work Environment Summary form, review of client/customer job hazard analysis reports, interview or request from Manpower's client/customer, and based on information provided from Associate/employees.

When indicated through one of the above noted methods, or when directed by Manpower's client/customer or the prime contractor for a work site, workers shall wear personal protective equipment deemed necessary.

What PPE is required; Who Must Wear it and; When Must It be Worn at the Client Site

PPE that is required at our client site will be determined on a client by client basis. All workers must comply with the client's requirements to wear PPE as directed by the client work site requirements. If an exception is required, both the client and Manpower's Health & Safety Coordinator should be consulted for discussion and decision.

What PPE is acceptable

The minimum acceptable standards will be determined by each Client. As a best practice, Canadian Standards Association (CSA) approved PPE is ideal (look for the green triangle).

Who Supplies the PPE

Footwear and Prescription Eyewear – will be provided by the Associate.

All other PPE – generally may be provided by either Manpower or the Client and in some cases the worker will be asked to provide.

Manpower/Client Owned PPE

The PPE provided to you is the property of the Manpower or the client, and we may require you to surrender the PPE upon the completion of your assignment. If this is done with the intention of re-issuing the PPE to another assigned worker, the PPE will be thoroughly examined to be sure there are no defects (chips, scratches, cracks, smears, tears, etc.). If defects are found the PPE will not be re-issued

Training on PPE

In order to provide you with training on the use, maintenance, and care for PPE, review the Personal Protective Equipment Information Sheet. This is available through your Manpower Representative.

WORKING ALONE SAFELY POLICY

Manpower will take all reasonable steps to comply with Part 28 of the Occupational Health and Safety Code, to ensure appropriate precautions in such circumstances. Manpower will evaluate work sites and take preventative steps which indicate to eliminate or minimize risk and develop effective communication strategies.

The objective of this policy is to secure workers from the risks associated with working alone under circumstances which could result in injury, health risk, impairment, or victimization through criminal violence or other adverse conditions.

ENVIRONMENT POLICY

In addition to ensuring all people (workers/employees/Associates, visitors, and contractors) associated with the work of Manpower remain healthy and safe, the company is also committed to preserving and protecting the environment we live and work in. All local, provincial, and federal regulatory requirements will be adhered to and enforced by Manpower. To ensure this, we will take steps to ensure that Manpower employees/workers/Associates are:

- Recycling all unused product(s) back into the process, where possible,
- Recycling all paper products,
- Using recyclable containers, when available,
- Properly storing any unused controlled products,
- Disposing of controlled product containers appropriately,
- Labeling all controlled products in accordance with WHMIS guidelines, to ensure accidental disposal is eliminated, and
- Clean up spillage immediately, using only appropriate spill cleanup techniques.

INJURIES ON THE JOB

Accidents can happen anywhere and anytime. Associates have the responsibility of reporting accidents to their immediate client supervisors and a Manpower Representative immediately, ideally within 1 hour. It is everyone's responsibility to immediately report any accident, illness, or incident which occurs at the workplace whether at a Manpower work location or at our client's workplace.

Claims Management Policy

Manpower is committed to providing effective claims management to reduce the impact of all work related injuries. Related to this process, Manpower subscribes to a progressive modified duties program. When injuries do occur, management of the claim is mandatory and all documentation shall be forwarded to the Manpower Human Resources Department immediately.

Modified Duties Policy

Manpower considers no phase of our operation to be more important than the wellbeing of its most valuable asset, our Associates/employees.

When an Associate suffers work related illness or injury, either in or outside the workplace, that results in absence from work not only is the employee's personal life affected, but the entire organization suffers as a result of the individual's inability to contribute.

To hasten a disabled Associate's return to work, or to keep the Associates as a productive contributor, Manpower Services will make every attempt possible to provide meaningful modified work duties to assist in the Associate's rehabilitation and restoration to healthy and productive normal work duties. Our goal is to contribute to a better quality of life for our Associates.

Injury Reporting Expectations

The purpose of this policy is to outline the procedures and responsibilities related to reporting an accident, illness or incident which occurs in the workplace.

Definitions

Accident: Bodily harm resulting from working; also known as an injury (an event that results in physical harm to an employee).

Illness: A deviation from the normal, healthy state of the body.

Incident: an event that results in injury to people and/or damage to the environment, equipment, property, and/or material.

Procedures

Reporting the accident by the injured worker

You must immediately report the situation to your client supervisor/manager verbally as well as contact your Manpower Representative. Your Manpower Representative needs to be notified within **1 hour of occurrence**. If it is impossible for you to report the situation for any reason, the reporting of the situation should be done in an acceptable time frame and where possible witnesses should assist in reporting. This is to ensure that you do not incur further harm. For example, a minor cut that may later become infected if not properly treated. Reporting your injury also helps ensure that any unsafe condition in the workplace is corrected. A near-miss should also be reported. It could be an indication of a condition that could cause serious injury to the next person who performs the task.

Treatment

The Client worksite First Aid Policy will apply, where onsite first aid is required. Let your supervisor or Manpower Representative know if you need assistance getting to professional help. Depending upon the type and nature of the injury that you sustain, your job-site supervisor or Manpower Representative may either:

- (a) suggest first-aid treatment at the jobsite; or,
- (b) refer or suggest a medical facility for treatment

Transportation

Manpower is committed to provide immediate transportation to a hospital, doctor's office, or other medical facility if necessary, when an injury occurs.

All Manpower Associates, when injured and when health care becomes necessary, are required to travel either by ambulance, or accompanied by another individual by taxi or car or driven by an individual approved by the injured worker (e.g. family member, etc.). Where emergency transportation to a hospital is required, we will contact 911 and secure an ambulance to transport the injured worker to the hospital.

Event Recording and Investigation Policy

Manpower views **all** events associated with performing work as preventable. Through the reporting and investigation of **all** events Manpower will be able to take a proactive approach to providing a safe workplace. All existing employees and new hires will be required to complete the Event Recording Form, when an event has occurred.

Upon being informed of an event if the worker has been assessed and it has been determined that the worker requires medical attention, a Manpower Representative will work with the client and the Associate to determine transportation arrangements to the nearest Health Center. An Event Investigation Report will be completed, determining the root causes, severity potential, and reoccurrence frequency.

All required reporting will be completed, in accordance with the *Occupational Health and Safety Act* and Regulations.

Event Records

To fulfill obligations to the Occupational Health and Safety Act and Code, Manpower will orient all Associates and complete the Incident/Injury Reporting Agreement at the time of orientation, ensuring understanding that an acute illness or injury must be reported **within one (1) hour of occurrence**.

To fulfill our obligation to Part 11 of the Occupational Health and Safety Code, the Event Recording Form shall be completed and maintained for a minimum of three (3) years. Records management is the responsibility of the Manpower Human Resources Department. All event records shall be maintained confidentially.

Event Investigations

All records shall initiate an investigation to be completed by the Manpower Representative, Representative, On-Site Supervisor, or responsible Supervisor/Manager, utilizing the Event Recording Form. The investigation shall be completed immediately. In any circumstance when the worker involved is not capable of completing an event record, the investigation shall proceed based on the allegation of the happening of an event.

All investigation forms shall be forwarded by end of day of event to the Support Center. The Support Center representative shall be responsible for completing the Event Investigation – Corporate Action Required Summary Report for assignment of action to indicate

supervisor/manager, recording of required action and recording of action being completed. The Event Investigation – Corporate Action Required Summary Report shall be reviewed and approved by the Chief Executive Officer on a monthly basis.

EARLY AND SAFE RETURN TO WORK PROGRAM

The objective of Manpower's Early and Safe Return to Work Program is to provide temporary, transitional modified or alternative work to Associates who, as a result of a workplace injury or illness, are unable to perform their usual and customary job, due to physical limitations.

Principles of Modified Duty including Work Hardening and Transitional Work

Manpower recognizes that injured or ill workers should perform meaningful and productive work as follows:

- The work must be productive and the result must have value.
- The work provided must not aggravate the employee's condition.
- The employee's condition must not constitute an additional hazard to the employee or fellow employee(s) while performing the duties assigned.
- The work must assist the employee either through progressive work hardening or through transitional work, in returning to their original position, if possible and if available, or support their recovery to maximum recovery.

Responsibilities

In order to ensure the applicability of our policy, we have identified the responsibilities of each party in achieving our goals.

Manpower's Responsibilities

- Contacting you as soon as possible after the injury occurs and maintaining communication throughout the period of your impairment and recovery.
- Attempting to provide suitable employment that is available and consistent with your functional abilities and that, when possible, restores your pre-injury earnings.
- Giving the Workers Compensation Board (WCB) such information as the Board may request concerning your return to work.

Injured Worker Responsibilities

- Contacting Manpower as soon as possible, ideally within 1 hour of occurrence, after the injury occurs and maintaining communication with Manpower throughout the period of your recovery and impairment;
- Assisting Manpower, as may be required or requested, to identify suitable employment that is available and consistent with your functional abilities and that, when possible, restores your pre-injury earnings;
- Maintaining contact with their health care providers and co-operating in any treatment as appropriate.
- Giving the Worker's Compensation Board (WCB) such information as the Board may request concerning your return to work; and
- Updating the WCB and Manpower regarding any change to your condition.

- Participating and cooperating with Manpower's Early Return to Work Program

It is important to note that if you fail to co-operate with a return to work program the Board may suspend WCB benefits.

Health Care Provider Responsibilities

Manpower does not have any health care providers on staff. External Health Care providers are expected to comply with their responsibilities under applicable legislation. Basic responsibilities include but are not limited to:

- Providing up to date medical information.
- Filling in applicable forms as requested.
- Act as a resource for information.

Workers Compensation Board (province specific)

- Process and adjudicate claims and maintain all responsibilities as outlined in applicable provincial legislation.

ACCOUNTABILITY AND DISCIPLINARY ACTION FOR SAFETY VIOLATIONS

The following process has been established to ensure that employees understand the established policy for discipline related to violating the policies, practices and rules contained in this Health & Safety Program.

Manpower Representatives will insist that Manpower Associates observe and obey all rules, regulations and directives required to achieve safe work conditions including the job-site safety rules of our clients.

A LAST WORD ABOUT YOUR SAFETY

Just as your job demands your full-time attention, so does your safety. You must be constantly on the alert for potentially dangerous situations. Accidents don't always happen to "somebody else." Remember, to others, **you are** "somebody else."

Manpower tries to take every precaution to assure the safety of all of our Associates. The precautionary measures in this guide, however, will be worthless to you without your complete cooperation. That is why it is important that you become thoroughly familiar with and follow the safety guidelines outlined here. If you need clarification or have questions about anything you have read in this Guideline, ask your Representative for assistance.

We also want to remind you of Manpower Alberta's Drug and Alcohol Policy. Please turn back to Page 5 and review it again so that you will fully understand it and have no doubts about how it could possibly affect you as a Manpower Associate.

This Safety Policy and Guidelines for Associates booklet is for your benefit. It is provided to help you work safely at assignments with Manpower. Also, in the event you are injured on the job, it will inform you what to do.

Now that you have reached this point, sign the Incident/Injury Reporting Agreement and Associate Agreement you have been provided, indicating that you have received this Guideline and understand the information it provides.

Remember, safety is everybody's business – make it yours!

ASSOCIATE'S RIGHT TO PRIVACY

Manpower respects the rights to privacy of its Associates in the application of this policy. For more information regarding Manpower's collection, use and disclosure of personal information, please see Manpower Canada's Personal Information Statement which can be found at www.manpower.ca