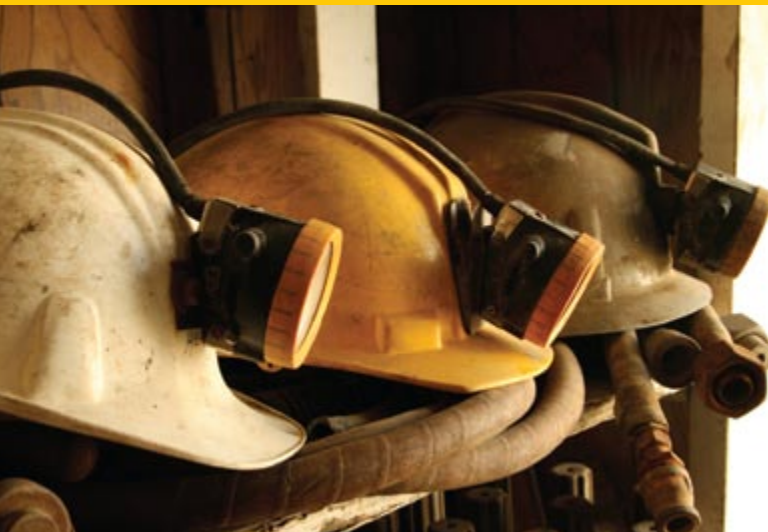


Health and Safety Policy Program

Volume II, December 2009



Technica Mining
a division of Technica Group Inc.



CANADIAN WELDING BUREAU

Health and Safety Policy Program

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Technica Mining Mission Statement and President’s Message

PROVIDING INNOVATIVE SOLUTIONS THROUGH HARD WORK AND CREATIVE THINKING IS NOT ACHIEVED SOLELY BY OUR DETERMINATION TO COMPLETE OUR WORK ON TIME OR ON BUDGET, BUT RATHER BY COMBINING OUR COLLECTIVE EFFORTS TO DO SO WITH EACH OF US RETURNING HOME UNHARMED EACH AND EVERY DAY.

It is our duty to ourselves, our families, and our customers to act in a manner that will offer a ZERO HARM workplace environment; ZERO HARM to one another, ZERO HARM to our equipment.

In order to do so, we must hold fast our conviction to the Internal Responsibility System, so that together we can eliminate or safely control workplace hazards.

As such, it is my responsibility to provide for all employees a framework to follow and ensure that we are complying with our Mission Statement.

Together, we can continue to make the right choices and make it simply unacceptable to work in an unsafe manner.

Mario Grossi
 President & C.E.O.
 Technica Group Inc.

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10 Fundamental Safety Rules

1. Working on Live Equipment

Must always abide by proper locking and tagging procedures for removing any energy sources, whether it be electrical or stored energy.

2. Entering a Confined Space

Proper confined space procedures must be followed at all times before entering a confined space.

3. Potential to Fall In a Open Hole

An appropriate travel restraint or fall arrest system must be worn and secured when working within 6 feet, or 1.8 metres of an open hole working environment and when working 10 feet, or 3 metres above ground.

4. Equipment Use by Non-Qualified Personnel

All equipment operators must be qualified to work on their respective pieces of equipment.

5. Disabling of Safety Devices

Must never do so without ensuring adequate alternative protection.

6. Unauthorized Burning/Welding

Hot-work may only commence when the proper paperwork is completed, and appropriate guarding and fire protection has been put in place.

7. Working Under the Influence of Drugs Or Alcohol

No person under the influence of liquor, drugs, or narcotics shall enter or knowingly be permitted to enter a mine or mining plant (O.H.S.A. Reg. #15(1) (2)).

8. Blasting and Guarding Infraction

Failure to follow written blasting and guarding procedures and related O.H.S.A. regulations is not tolerated.

9. Working Under Unsupported Ground

As it related to the O.H.S.A Reg. #67 (1)(2)(3), or as otherwise determined.

10. Failure to Follow Safe Rigging Practices

Any use of rigging equipment in excess of its recommended safe workload; use of defective equipment; hoisting over personnel; or any other unsafe rigging/hoisting activities.

Important:

1. These Safety Rules are of equal priority and shall all be respected in the same manner.
2. Any infraction of these rules whatsoever will result in immediate and permanent discharge.

Safe Production Model



Worst Case Scenario Approach

What Is *Worst Case Scenario Approach*?

The *Worst Case Scenario Approach* is the study of your workplace environment on an ongoing, continuous basis to determine “what is the worst possible thing that can happen to me right now, right here?”.

When, Why and How Does the *Worst Case Scenario Approach* Work?

By simply thinking about the worst possible thing that can happen to you in your workplace throughout your shift, you can begin to plan accordingly, taking all necessary safety precautions to protect yourself from these worst possible situations.

For good practice, you can exercise the *Worst Case Scenario Approach* in everything that you do. For example, if you were to walk down a flight of stairs in your house, think about the worst thing that could happen to you. When you consider all worst case possibilities, you’ll immediately find yourself grabbing the handrail – something you likely haven’t done in a while as we become complacent from time to time.

Like the stairway example, you must exercise the *Worst Case Scenario Approach* at all times in the workplace, from walking to your worksite to completing various job tasks. Upon doing so, you will quickly realize that almost all industrial workplace activities can lead to a fatality.

This somber conclusion will bring safe work practices back into the forefront of your thoughts and activities both consciously and subconsciously. It will help remove complacency in your daily tasks. It will help you plan accordingly and develop safe work practices that will allow you to perform your duties safely and injury free.

Definitions

Workforce:

All Workers and Line Management.

Worker(s):

Employee(s).

First Line Supervisor:

Production, Construction and Maintenance Supervisors.

Second Line Supervisor:

Site Superintendents, Safety Superintendents and Safety/Training Supervisors.

Third Line Supervisor:

Area Manager.

Fourth Line Supervisor:

President - C.E.O.

Line Management:

From First Line Supervisor up to and including the President.

1. Standards, Procedures and Programs

Objective:

To provide the employees with a framework that identifies their roles and responsibilities regarding standards, procedures and safety programs in the work place.

1.1 Workplace Standards and Procedures

Scope of Work:

Develop/communicate/implement and maintain generic and/or specific workplace standards and procedures or communicate/implement site specific workplace standards and procedures.

Process:

After a need has been identified, the Manager assigns responsibility. The Safety/Training Supervisor will ensure that these standards/procedures are developed, communicated and implemented or will request site specific standards/procedures are received to be communicated and implemented by Technica Mining crews.

Timeframe:

Standards and procedures are to be developed in a timely manner. Timeframe for completion of process is dependent upon the potential severity and frequency of associated risks involved.

1.2 Modular Training Program

Scope of Work:

All workers will be accredited in the work that they are performing thus ensuring a competent work force.

Process:

After training needs have been identified, second line supervisors will prioritize training needs. The Safety/Training Supervisor determines resources and provides training according to priorities and ensures this training is properly recorded and registered with the Ministry of Training, Colleges and Universities (MTCU).

Timeframe:

The Safety/Training Supervisor will maintain a monthly training plan and deal with emergency requests as required.

The Safety/Training Supervisor will monitor and audit all training activities to ensure compliance with the Occupational Health and Safety Act and Regulations and Ministry of Training, College and University regulations.



WARNING

1.3 Risk Management Program

Scope of Work:

To conduct assessment of selected processes and equipment to pro actively identify and evaluate risk and determine preventive action required to eliminate or reduce the potential for loss.

Process:

Manager, Site Superintendent, Safety Superintendents and/ or Safety/Training Supervisor will use either one or all of the following: Failsafe Checklist, PHR (Process Hazard Review) and RAMP (Risk Assessment and Management Program) to determine preventative actions required.

Timeframe:

As required.

1.4 Emergency Preparedness

Scope of Work:

To establish and maintain emergency response capability which will minimize loss from unexpected events.

Process:

The Safety Superintendent and/or Safety/Training Supervisor, in conjunction with the Second Line Supervisor will coordinate the communication/implementation and maintenance of emergency response plans as well as ensure that site specific emergency procedures are communicated and implemented with Technica Mining crews.

Timeframe:

The Safety/Training Supervisor will lead an annual review of all emergency response plans.





1.5 Internal Responsibility System (IRS)

Scope of Work:

To advise entire workforce that “*SAFETY STARTS WITH ME*” and that “*EVERYONE IS RESPONSIBLE FOR SAFETY*”. To define responsibilities and relationships, working with mutual commitment to eliminate or control workplace hazards

Process:

Through effective Communication, Workers and Line Management embrace that EVERYONE is responsible for meeting our Safety Mission Statement of arriving home safely, everyday.

Some examples of roles and responsibilities that fall under the IRS:

- Stop & Correct.
- Safely perform assigned duties.
- Use safety equipment as directed by the manufacturers’ recommendations.
- Correct or report unsafe conditions.
- Report incidents regardless of severity as they could potential result in an injury and/or equipment damage.
- Work in a manner that will not endanger yourself or others.
- Advise others of known unsafe conditions or work practices.
- Be aware of and follow all applicable legislation and safe work procedures.

Timeframe:

IRS is in effect at all times!

1.6 Accident/Incident Investigation

Scope of Work:

All injuries and incidents will be investigated to determine why they occurred, whereby appropriate preventative action(s) can be implemented to reduce the likelihood of recurrence.

Process:

All accidents and incidents will be investigated to identify their basic cause(s) and to develop recommendations to prevent re-occurrences.

The Technica Mining “079” Form, MASHA Accident Form, or Xstrata’s SIR form will be used as the vehicle for all investigations (appropriate form to be determined as per sites’ requests).

The First Line Supervisor, in consultation with the injured worker, will initiate an accident/incident form for all injuries and incidents.

All accidents and incidents require varying degrees of investigation to arrive at the above objective.

It is with this understanding that management has the flexibility to increase or decrease the level of investigation for each accident / incident as deemed necessary.

Together, the Worker(s), First, Second and Third Line Supervisors will spearhead an investigation at the respective mine site, requesting input from the various parties involved, as well as reviewing accident/incident reports for thoroughness when generated. The management team will assess the recommendations and determine which will be

implemented. The team will review the accepted recommendations and their completion dates at the bimonthly management meeting. All recommendations will be reviewed at the Supervisor’s Monthly Safety meeting to ensure that all Technica Mining employees are made aware of preventative measures.

A Serious Incident/Accident by definition is “one which may cause, or have the potential to cause a fatality or debilitating injury for life or cause equipment / property damage and / or loss to process in excess of \$500,000.”

Critical Injury – Defined in R.R.O. 1990, Regulation 834

For the purpose of the Act and Regulations, “Critically Injured” means an injury of a serious nature that:

- Places life in jeopardy;
- Produces unconsciousness;
- Results in substantial loss of blood;
- Involves the fracture of a leg or arm, but not a finger or toe;
- Involves the amputation of a leg, arm, hand, or foot, but not a finger or toe;
- Consists of burns to a major portion of the body; or
- Causes the loss of sight in an eye.

In the event of any injury/incident, Technica Mining reserves the right to request that an immediate drug test be performed whereby the Worker(s) will be escorted directly to a proper facility for this to occur.

Timeframe:

As required.

1.7 Five Point Safety System/ Stop Work and Correct

Scope of Work:

To establish a system to assist workers to perform work safely, without exposing themselves to unnecessary risks.

Process:

EACH AND EVERY WORKER WILL COMPLETE THEIR OWN 5-POINT SAFETY CARD FOR EVERY SHIFT WORKED. The worker must complete Points No. 1 and No. 2 on the card. In the event the worker finds a substandard or unsafe condition, he/she must correct it immediately and make note of it in the “Stop and Correct Action Taken” section of the card. Together with the Worker present, the First Line Supervisor reviews the 5-Point Safety Card of each Worker, confirms proper standards and procedures are being followed, and ensures that no legislated contraventions are being performed. The First Line Supervisor then completes Point No. 3 on the card. The First Line Supervisor and the Worker discuss safety topic, which may include a review of any previous accidents/incidents, specific hazards, work practices or legislative requirements. This provides an opportunity to encourage safe work habits and raise safety awareness. The First Line Supervisor will continue to complete Point No. 4 of the card making note of the “Act of Safety” as discussed. The First Line Supervisor, based on his discussion with the worker and his/her observations within the workplace, must determine if the worker has the ability (knowledge & skill) and motivation (attitude) to perform the work in a safe manner. Additionally, the First Line Supervisor must give



consideration to the safe condition of the tools and equipment being used. BOTH the Worker AND the First Line Supervisor have a shared responsibility to ensure Point No.5 of the system is reviewed and documented on the card. Included in this discussion are the safe work expectations for the remainder of the shift.

See 5 Point Safety System Protocol.

Timeframe:

- Start of each shift.
- Upon entering work area.

1.8 Personal Protective Equipment Program

Scope of Work:

To identify and communicate our PPE requirements and provide the best products available to reduce exposure to hazards that cannot be engineered out of the work place.

Process:

Technica Line Management will ensure that all of our Worker(s) use and wear PPE as required by Technica Mining, the O.H.S.A and Regulations, and any site specific requirement. In addition the First Line Supervisor will ensure that specific PPE required for specific work is made available and used by Worker(s) as applicable.

Annually, each First Line Supervisor will conduct a formal PPE audit with each member of their crew to ensure their PPE is in good condition.

Timeframe:

- PPE Assessments - as required.
- PPE Audit - Annually.



DANGER

1.9 Early and Safe Return to Work Program

Scope of Work:

To provide fair and consistent practices for accommodating Workers who have been injured or permanently disabled on the job to enable their return to work through early intervention, rehabilitation programs and providing meaningful work.

Process:

Technica Mining will provide meaningful work to accommodate worker(s) requiring modified work due to workplace-related injury. Technica Mining will use WSIB forms such as: Procedure, RTW Roles and Responsibilities, Required Letters, Job Demands Analysis, etc.

Time Frame:

As required.



Return To Work Policy

A workplace injury can be devastating to any worker and their family. Our focus is the Prevention of all workplace accidents and injuries. However, in the event of an occupational injury we have adopted the philosophy of returning an injured worker to meaningful and productive work, where possible, in order to protect their earning ability and minimize the disruption to their personal lives.

A Return to Work Program has been developed which is committed to providing suitable work consistent with the functional capabilities of an injured worker. In almost every case we will be able to immediately accommodate the worker with modified work within their physical capabilities. The goal of the program is to return the worker to their pre-injury position through good communication with all parties involved and through fair and consistent treatment in the provision of modified duties.

The worker is responsible for having the Functional Abilities Form for Timely Return to Work completed and returned to the company within 24 hours so that the workplace parties can jointly develop an early and safe return to work plan.

The co-operation and positive attitude needed to maintain the effectiveness of this program is essential by everyone. The program also requires respect for the returning injured worker by all employees and management. We therefore ask that everyone does their part to keep our valuable team together and keep us all working.

1.10 Sub-Contractor Management

Scope of Work:

To prevent or minimize injury or illness to Sub-Contractor(s) and Technica Mining employees and to ensure Contractor(s) comply to Technica Mining and site-specific standards, procedures and legislated requirements.

Process:

- a) Ensure sub-contractor is ISO certified
- b) Ensure sub-contractor has been pre-qualified with owner.
- c) Determine Scope of Work.
- d) Purchase order issued (assigns contact person and has Technica Mining and Site specific Standards and Procedures, Terms and Conditions, employee training requirements, commercial terms etc.).
- e) Perform a PHR where applicable.
- f) Perform Risk Assessment & Management Program (RAMP) if applicable.
- g) NORCAT/WHMIS.
- h) Contact person to ensure that, upon arriving on site, contractors performing the work have the MTCU training documentation as referenced within the Project Work Analysis. A copy of these records will be kept on file by the Training Department.
- i) Site Orientation (Site Superintendent).
- j) Job specific induction (Contact Person).

- k) Daily contact on property (Contact person or designate). Where the contractor has their own supervisors on site there will also be assigned Technica Mining supervisors making contact with them in the workplace.
- l) The pre-determined form will also be used for Accidents/ Incidents which involve contractors on site.

Time Frame:

Every purchase order issued for contract project work.

1.11 New Employees

Scope of Work:

To ensure new employees receive proper indoctrination with Technica Mining Health and Safety Policy, Technica Mining Employee Handbook, and Technica Mining Standards and Procedures.

Process:

- a) Technica Mining reserves the right to request a drug test report from all new prospective employees prior to offer of employment
- b) New employees are to provide previous training records and any other pertinent information as requested
- c) New employees are to take part in Technica Mining's Hiring and Indoctrination process which includes reviews of Technica Mining's Health and Safety Policy, Employee Handbook, and Standards and Procedures
- d) New employees are to receive site specific orientation as required

Timeframe:

As required.



2. Communication

Objective:

- i) To ensure that thorough and effective communication circulates fluidly between Line Management and Workers and alternatively, from the Workers through to Line Management.
- ii) To ensure the Workers clearly understand their respective roles and responsibilities regarding workplace standards, procedures and programs as outlined with the Health and Safety Program.

2.1 Crew Meetings

Scope of Work:

To afford an opportunity for Line Management to reinforce their commitment to safety, discuss critical information and address health and safety concerns raised by their crew.

Process:

- i) Daily Tool Box Safety and Line-up Meeting to be performed at the start of each shift with crews. This will focus on safety specifics with the crew.
- ii) Bi-monthly Management meeting with Second and Third Line Supervisors to review and discuss Safety, Tools/ Equipment, Projects and miscellaneous Issues.
- iii) Monthly Supervisors Safety Meeting.
- iv) Annual meeting with all Technica Mining Personnel

- v) Project start-up meeting with designated Technica Mining personnel.

Timeframe:

See Section 3.5 for Reporting Framework.



2.2 Joint Health and Safety Committee

Scope of Work:

To provide an opportunity for the members of the Joint Health and Safety Committee to communicate health and safety-related information and activities to the workforce, to be more proactive in developing safety awareness throughout the site, to participate in the development of safety initiatives, and to help emphasize safety to individual workers so that they will take safety personally.

Process:

Members of the Joint Health and Safety Committee will use the following avenues to achieve effective communication:

- Quarterly JHSC Meetings.
- Monthly JHSC Inspections.
- JHSC Minutes will be reviewed during crew safety meeting.
- JHSC Minutes will be posted at the workplace.
- Through personal interaction with workers.

Timeframe:

See Section 3.5 for Reporting Framework.

2.3 Workplace Visits

Scope of Work:

To improve the communication of health and safety-related issues to the workforce.

Process:

The workforce shall utilize the Five Point Safety System daily within all work places. This system allows Line Management to encourage safe work habits and raise safety awareness.

The Safety Superintendent and/or Safety/Training Supervisor shall conduct a monthly workplace inspection to promote the use of the Five Point Safety System and the Stop Work and Correct process as well as perform Safety inspections.

Timeframe:

See Section 3.5 for Reporting Framework.

2.3 Safety Bulletin Boards

Scope of Work:

To provide relevant health and safety related information to the workforce.

Process:

Technica Mining will maintain a safety bulletin board at each site trailer(s) to display health and safety related information. To ensure only accurate and appropriate information is placed on the monitor, all information must be reviewed by the Safety Superintendent or Safety/Training Supervisor or Site Superintendent prior to being displayed.

Timeframe:

See Section 3.5 for Reporting Framework.

3. Compliance

Objective:

To motivate and encourage our workforce to work in compliance with and truly embrace our Technica Mining Health and Safety Program, the OHSA and Regulations, and any pertinent standards/procedures as required; and to continually make good choices and arrive home safe after each shift

3.1 Program Inspections and Audits

Scope of Work:

Measure compliance to company Safety Conformance Matrix, procedures and programs as well as the OHSA and Regulations, and any site-specific standards, procedures and programs.

Process:

Audits and Inspections include;

- Health and Safety inspections and audits
- Safety Awards Recognition Program audit
- Five Point Safety System
- Planned Task Observations

Timeframe:

See Section 3.5 for Reporting Framework.



3.2 Health and Safety Strategies

Scope of Work:

To implement programs and actions to support the Safe Production Model.

Process:

Management and J.H.S.C. will develop an annual Health and Safety Strategy.

Timeframe:

See Section 3.5 for Reporting Framework.



3.3 Employee Performance Appraisals

Scope of Work:

To provide employee with feedback on past performance and outline possible action plan for improvement.

Process:

Employee Performance Evaluation form is completed by the First Line Supervisor and then delivered to the Second Line Supervisor for comments and signature. An interview is then held with the worker by the First Line Supervisor for appraisal review. The worker agrees or disagrees and signs. The completed appraisal is then sent to the balance of Line Management for review, then ultimately forwarded to the Administrative Assistant for placement in the worker's file.

Timeframe:

- 30 Day, 60 Day and 80 Day appraisals for new employees.
- *See Section 3.5 for Reporting Framework.*

3.4 Disciplinary Policy

Scope of Work:

To use the Technica Mining Disciplinary Policy to address non-compliance issues relating to the Technica Mining Health & Safety Program, Technica Mining Employee Handbook, Technica Mining Standards and Procedures, the OHSA and Regulations, and any site-specific standards and procedures.

Process:

Through a proper interview process, a consistent and appropriate disciplinary approach will be applied.

Timeframe:

As required.

3.5 Safety Reporting Framework

Safety Compliance	Reporting Time Frame					
	Daily	Weekly	Bi-Weekly	Monthly	Annual	As Required
Daily Tool Box Safety & Line-up Meeting	✓					
5-Point Safety Cards	✓					
Personal Contact		✓				
Workplace Inspection				✓		✓
Management Meeting			✓			
Job Observations				✓		
Employee Evaluations					✓	✓
Job Demonstrations				✓		
Line Management Meetings				✓		
Company Wide Management Safety Review					✓	



Technica Mining Health and Safety Policy Program Sign-Off

I have read and understood my responsibilities regarding the Technica Mining Health and Safety Policy Program and will follow them accordingly.

Employee Name (print)

Employee/Norcat No.

Date

Signed





Technica Group Inc.
Health and Safety Policy
Revised December 2009



Technica Mining
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