

## **1.0 Purpose**

The purpose of this document is to provide guidance for the consistent classification of Safety Absolutes violations across all CBGOC sites. All Trade Partners working with Clark Builders agree to enforce the rules in accordance with the terms and conditions outlined in this Standard (and as may be amended from time to time by Clark Builders).

The Safety Absolutes are intended to support existing company management systems, programs, and policies. Clark Builders shall regularly audit the Safety Absolutes to ensure the standards meet the needs of the Company and comply with this Standard and all its applicable requirements. Any changes to this Standard must be approved by the CBGOC Governance Committee.

## **2.0 Scope**

This Standard applies to all CBGOC employees, Trade Partners, Trade Partner subcontractors, on-site vendors and visitors.

## **3.0 Accountabilities**

Clark Builders Leadership are accountable for communicating, training, implementing, and auditing the Safety Absolutes to assure compliance and performance. Adherence to the Safety Absolutes and all safety policies, processes and procedures are an obligation for all personnel.

In accordance with occupational health and safety legislation all workers are responsible for protecting the health and safety of themselves and other workers.

## **4.0 Enforcement**

A breach or non-compliance to any Safety Absolute is unacceptable. All Safety Absolute infractions shall be investigated in a timely manner and root causes determined. Individuals involved in a blatant breach of rules that jeopardize the life of themselves or others will be suspended until the investigation is complete. If the investigation confirms a breach in Safety Absolutes, the result will be immediate termination (CBGOC employees) or dismissal (Trade Partner, Trade Partner subcontractor, and on-site vendor employees).

Any individual found through the investigation to be complicit in the breach in Safety Absolutes shall also be subject to immediate disciplinary action, up to and including termination/dismissal.

## **5.0 Investigations**

Upon identification of an incident where a potential Safety Absolute violation has occurred, the incident will be investigated as per Clark Builders' incident management process. Investigations will be completed within 24 hours of the violation by a CBGOC Supervisor or HSE Representative. If a Safety Absolute violation is confirmed, the incident is classified as a Safety Absolute violation in the incident management tool in Procore.

Investigations may reveal that the person(s) involved were the victims of another's act or omission or the violation occurred due to a system error, and therefore should not be held responsible for the Absolute violation. In these circumstances, appropriate disciplinary action will be taken based on the investigation findings.

The decision for disciplinary action(s) should be taken after the investigation is completed. The incident owner shall consult with their Human Resources Representative and/or Labour Relations Representative to determine the application of consequences.

## 6.0 Reinstatement

Clark Builders will consider reinstating CBGOC employees, Trade Partners, Trade Partner subcontractors, on-site vendors, and visitors who have been terminated or dismissed by way of a Safety Absolute violation. Individuals will be eligible for reinstatement only once, 90 days after the initial termination/dismissal, and only after a formal, written request for reinstatement has been submitted to Clark Builders HSE.

Upon receipt of a reinstatement request, Clark Builders shall reference the violation investigation and consult with representatives from Human Resources, Operations and HSE. If Clark Builders determines that the individual and Employer have demonstrated sufficient diligence in preventing any such violation from recurring, the reinstatement request will be approved.

Any further Safety Absolute violations by an individual who was reinstated will result in permanent termination/dismissal from Clark Builders workplaces.

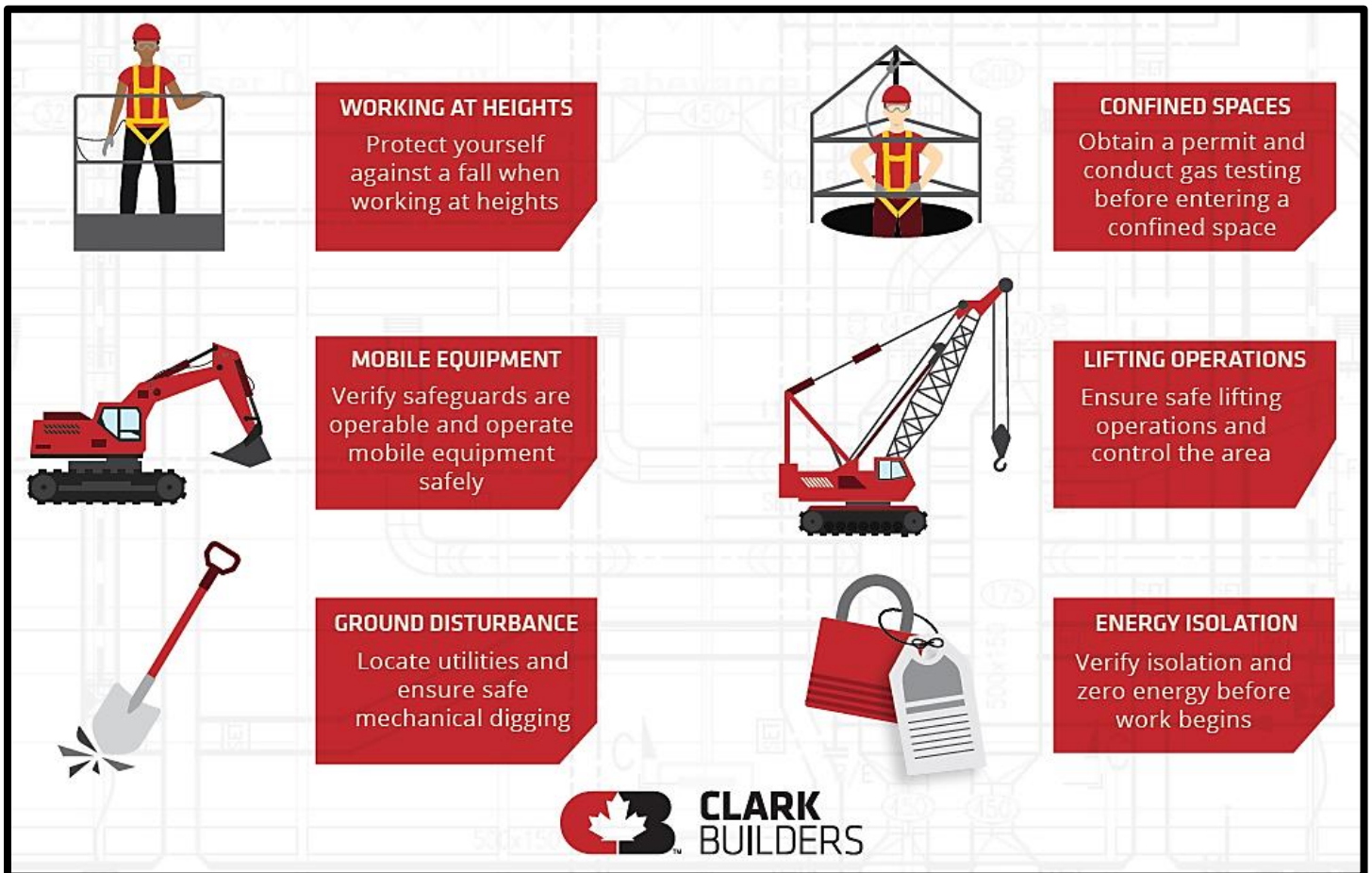
## 7.0 The Safety Absolutes

The Safety Absolutes have been implemented to improve safety performance and mitigate risks to workers in the areas where we have a history of significant injuries or fatalities in the industry, as well as significant incidents across Clark Builders. These rules will be recognized and enforced across all CBGOC sites.

## 8.0 Safety Absolutes Description and Violation Details

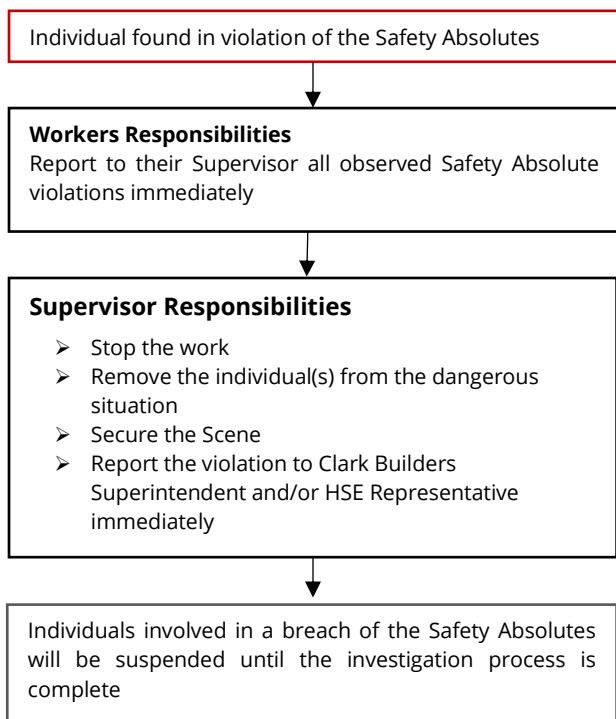
The following Safety Absolutes (Appendix I) will be enforced at all CBGOC sites:

1. **Working at Heights:** Protect yourself against a fall when working at heights.  
Violation Details: Fall protection is not used when working at height (3 meters or more) and within 2 meters of an unprotected fall hazard.
2. **Confined Spaces:** Obtain a permit and conduct gas testing before entering a confined space.  
Violation Details: Entering a confined space without a permit; and testing and monitoring the atmosphere is not conducted or confirmed before entry.
3. **Mobile Equipment:** Verify safeguards are operable and operate mobile equipment safely.  
Violation Details: Disabling and/or overriding safety devices; Exceeding the load limits of the equipment; and a safe distance is not maintained from overhead powerlines.
4. **Lifting Operations:** Ensure safe lifting operations and control the area.  
Violation Details: A safe distance is not maintained from overhead powerlines; A lift is conducted beyond the working load limits of the lifting equipment; and the load is positioned directly above personnel with no warning or exclusion zones.
5. **Ground Disturbance:** Locate utilities and ensure safe mechanical digging.  
Violation Details: Mechanical ground disturbance without locates; and deliberate mechanical ground disturbance in violation of the safe limits of approach of a known live utility.
6. **Energy Isolation:** Verify isolation and zero energy before work begins.  
Violation Details: Hazardous energy associated with the work scope is not isolated, locked and/or tagged.

**APPENDIX I – SAFETY ABSOLUTES**

**APPENDIX II – SAFETY ABSOLUTES FLOWCHART**

This flowchart outlines the reporting, investigation and disciplinary process for any CBGOC Employees, Trade Partners, Trade Partner Subcontractors, On-Site Vendors or Visitors on a Clark Builders workplace found in violation of the Safety Absolutes.

**REPORTING PROCESS****CBGOC Supervisor/HSE Representative will**

- Ensure the work has stopped and the scene where violation occurred is safe for others
- Gather evidence, including taking statements from Witnesses
- Notify CBGOC Management in accordance with a Level 4 event (*Ref Actual/Potential Severity Matrix*)
- Complete Safety Absolutes Incident Record and investigation in Procore
- Recommend Corrective Actions

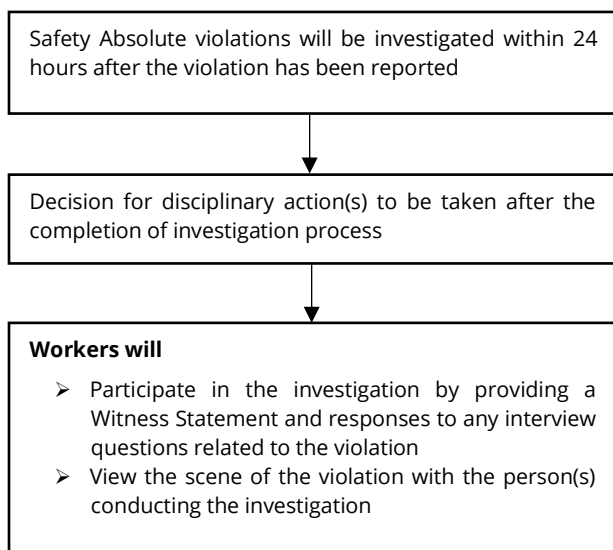
**DISCIPLINARY PROCESS**

Clark Builders Operations, HSE and HR will discuss the outcome of the investigation prior to any decision for disciplinary action.

**If the investigation confirms a breach of a Safety Absolute:**

- Termination of employment for CBGOC Employees (led by CBGOC Human Resources)
- Dismissal from all CB projects sites for Trade Partners, Trade Partner Subcontractors, On-site Vendors and Visitors (led by CBGOC Supervisor responsible for the project)

Those found to be complicit in the breach of a Safety Absolute shall face appropriate disciplinary action based on the findings of the investigation, up to and including termination/dismissal.

**INVESTIGATION PROCESS****REINSTATEMENT**

- Clark Builders will consider reinstating individuals who breached a Safety Absolute violation.
- Individuals will be eligible for reinstatement only once, 90 days after termination/dismissal.
- A formal, written request for reinstatement must be submitted to Clark Builders HSE.
- Applicants must demonstrate that sufficient diligence has been performed to prevent recurrence.
- Approvals granted are to be noted on request form, from both Clark Builders Operations and HSE.