



Company Discipline Policy

The necessity for workers to conduct their work or services in accordance with regulatory and Company conformance safety requirements is a fundamental requirement of the Northwest Ventilation & Air Conditioning (1977) Ltd. Health, Safety and Environmental Program.

In the event a worker who has been previously advised of the Company's safety requirements violates any policy, practice, procedure, rule or reasonable instruction given by a person qualified to do so, then the worker may be subject to disciplinary measures.

In an effort to provide supervisors with the necessary guidance and direction as it relates to safety violation(s) "due process", a written procedure has been developed to ensure that those impacted receive equitable treatment.

It is the expectation of Northwest Ventilation & Air Conditioning (1977) Ltd. that when circumstances warrant disciplinary action, supervisors will implement the progressive disciplinary procedure in a timely manner. In all instances, disciplinary action will be applied on a fair and consistent basis while maintaining strict confidentiality.

Violation of the Company's rules or other safety and environmental legislation, will be handled in an objective, but firm manner.

The discipline policy progresses as follows:

- 1st Offence: Verbal Warning (documented)
- 2nd Offence: Written Warning
- 3rd Offence: Suspension and/or Termination

Offenses justifying immediate dismissal from employment include, but are not limited to the following:

- An employee violating the safety and/or health of themselves or other around them
- An employee has acted in a willful misconduct
- An employee has committed theft

Documentation of any and each indiscretion will be completed and kept on file.

Owner

Signature

Date



Company Health, Safety & Environmental Policy

Northwest Ventilation & Air Conditioning (1977) Ltd. believes that Safety, Health and Environment is an integral component to a successful company. All Workers have the right to a safe and healthy workplace and we will strive to create and maintain a safe and healthy work environment. Northwest Ventilation & Air Conditioning (1977) Ltd will work with workers and supervisors in efforts to continually improve our Safety, Health and Environmental Program.

Northwest Ventilation & Air Conditioning (1977) Ltd will comply with safety, health and environmental regulations applicable to company operations as per our clients, industry & legislation.

Northwest Ventilation & Air Conditioning (1977) Ltd is committed to providing active leadership and complete support in order to develop and maintain:

- A Safety Health and Environmental Program designed to prevent human pain and suffering from personal injury, to prevent environmental damage and to prevent economic losses from injuries, environmental incidents or property damage.
- A Safety, Health and Environmental program designed to provide the proper training and provide access to safety and environmental legislation to ensure workers, supervisors, sub contractors and owners know their legislated rights and responsibilities.
- A Safety, Health and Environmental program designed to provide the security, protection and well-being of personnel and property at our office and job sites by preventing and controlling violence, harassment, misconduct and theft.

It is imperative that everyone at Northwest Ventilation & Air Conditioning (1977) Ltd give complete endorsement, active participation and enthusiastic cooperation with the Safety, Health and Environmental Program. To this end, we will provide a safety and healthy work environment.

Owner

Signature

Date



Emergency Preparedness & Response Policy

It is Northwest Ventilation & Air Conditioning (1977) Ltd. obligation as an employer to ensure all employees are educated and prepared for all emergencies and the correct process in which to respond.

All Company workplaces such as office, shop/warehouse, job sites and all company vehicles are equipped with local emergency phone numbers as well as location and directions to the nearest hospital and/or medical facility. The emergency phone numbers are posted on the company safety board, are found in all company vehicles and on all job sites.

Employees will be educated on company emergency plans during their orientations. In addition, all job site employees will be educated on the site specific emergency plans during site orientation. These site specific emergency plans are also reviewed during tool box talks.

Northwest Ventilation & Air Conditioning (1977) Ltd is responsible to ensure that proper equipment is available for workers to respond to all injury, fires, spills and any other emergency that may occur. All facilities are equipped with proper emergency equipment, First Aid and means of communication & transportation in accordance with legislation.

ZINO VALERI
Owner

[Signature]
Signature

JAN 20/2014
Date



Hazard Assessment Policy

It is the Policy of Northwest Ventilation & Air Conditioning (1977) Ltd. that hazard assessments are completed and recorded. A hazard assessment is to be done before any work begins daily, when the job/site conditions change, when doing a job that is associated with incidents or in any circumstance or condition that poses a risk of injury.

Hazard assessments are to be done in the in the form of safety H.I.T lists (or equivalent), conducted by the safety representative and supervisor together. They will both sign off on the completed document. The identified hazards will be prioritized, and the controls will put into place. The document will be posted on site making it readily available to all employees, subs and visitors.

Management, supervisors, safety representatives and all employees, including sub contractors will abide by our hazard assessment policy.

PINO VACCARI
Owner

[Signature]
Signature

JANUARY 20/2014
Date



Section 9: Inspections

Policy

It is the Policy of Northwest Ventilation & Air Conditioning (1977) Ltd. to conduct regular Safety, Health and Environmental inspections. Inspections are designed to check for compliance with established work practices, job procedure and other applicable safety, health and environmental rules.

Northwest Ventilation & Air Conditioning (1977) Ltd is committed to performing a formal written inspection within 2 days of starting work at any long term (lasting more than 2 days) job site, and monthly thereafter. Short term (less than 2 day in duration) jobsite will generally be inspected on an informal basis. Office/shop will be inspected monthly.

Informal safety and environmental inspections will be conducted at all work sites by project managers, supervisors and/or safety reps on an ongoing basis (daily). Documentation of informal inspection will be recorded on HIT lists and kept on site. Upon identification of a new safety or environmental hazard, the inspector will perform a hazard assessment and take the appropriate actions to control the hazard(s).

Workers and/or the safety rep will be included in the inspection when possible. Workers will be warned and properly notified regarding all hazards potentially impacting their safety and health. Senior management will address safety and environmental hazards identified during inspections in a timely manner.

Formal and informal inspection will be discusses at toolbox talks, allowing discussion amongst workers, supervisors and managers. Inspection reports will be made readily available to all works.

Pino Valeri
Owner

[Signature]
Signature

January 20/2014
Date

Section 13: Legislation and Guidelines

Northwest Ventilation & Air Conditioning (1977) Ltd. will ensure that all employees know their rights and duties under the Workplace Safety and Health Act & Regulations. All employees are informed and educated on how to exercise their 3 fundamental rights:

- THE RIGHT TO KNOW
- THE RIGHT TO PARTICIPATE
- THE RIGHT TO REFUSE UNSAFE WORK
- THE RIGHT TO WORK WITHOUT BEING SUBJECT TO DISCRIMINATORY ACTION

Employees are also informed on their safety responsibilities with the company:

- Follow instruction
- Wear the required personal protective equipment
- Do not conduct work in a manner that may endanger oneself or others
- Identify, communicate and control hazards

As an employer, Northwest Ventilation & Air Conditioning (1977) Ltd will meet all required responsibilities as outlined in the Workplace Safety and Health Act and Regulations and provide employees with complete access to the WSH Act and Regulations by providing copies in all vehicles, and on all work sites as well as in the office. This gives employees the ability to further educate themselves and acts as a reference tool to be used in regards to responsibilities and procedures.

It is understood, as an employer, Northwest Ventilation & Air Conditioning (1977) Ltd is responsible to:

- Provide a safe and healthy workplace
- Train employees on potential hazards
- Ensure all employees have the correct certification
- Correct unsafe acts and conditions
- Report and investigate all incidents

All employees of Northwest Ventilation & Air Conditioning (1977) Ltd, as well as the company itself, are required to follow all appropriate legislation. Northwest Ventilation & Air Conditioning (1977) Ltd understand the severity of potential incidents occurring and the importance conducting all necessary due diligence for the accurate and safe continuation of operations. This due diligence includes proper and complete reporting to the Workers Compensation Board, ensuring all workplace safety and health guidelines are followed, legislation is met and enforced and to participate in the identification, communication and control of all hazards.

Section 13: Legislation and Guidelines

Northwest Ventilation & Air Conditioning (1977) Ltd. will ensure that all employees know their rights and duties under the Workplace Safety and Health Act & Regulations. All employees are informed and educated on how to exercise their 3 fundamental rights:

- THE RIGHT TO KNOW
- THE RIGHT TO PARTICIPATE
- THE RIGHT TO REFUSE UNSAFE WORK
- THE RIGHT TO WORK WITHOUT BEING SUBJECT TO DISCRIMINATORY ACTION

Employees are also informed on their safety responsibilities with the company:

- Follow instruction
- Wear the required personal protective equipment
- Do not conduct work in a manner that may endanger oneself or others
- Identify, communicate and control hazards

As an employer, Northwest Ventilation & Air Conditioning (1977) Ltd will meet all required responsibilities as outlined in the Workplace Safety and Health Act and Regulations and provide employees with complete access to the WSH Act and Regulations by providing copies in all vehicles, and on all work sites as well as in the office. This gives employees the ability to further educate themselves and acts as a reference tool to be used in regards to responsibilities and procedures.

It is understood, as an employer, Northwest Ventilation & Air Conditioning (1977) Ltd is responsible to:

- Provide a safe and healthy workplace
- Train employees on potential hazards
- Ensure all employees have the correct certification
- Correct unsafe acts and conditions
- Report and investigate all incidents

All employees of Northwest Ventilation & Air Conditioning (1977) Ltd, as well as the company itself, are required to follow all appropriate legislation. Northwest Ventilation & Air Conditioning (1977) Ltd understand the severity of potential incidents occurring and the importance conducting all necessary due diligence for the accurate and safe continuation of operations. This due diligence includes proper and complete reporting to the Workers Compensation Board, ensuring all workplace safety and health guidelines are followed, legislation is met and enforced and to participate in the identification, communication and control of all hazards.



Section 14: Manitoba Supplement

Introduction

This section of our Health, Safety & Environmental Program addresses a number of safety and environmental issues.

Worker Safety Representative

Northwest Ventilation & Air Conditioning (1977) Ltd. ensures that there is a safety representative on each worksite at all times. This employee receives company specific training in Northwest Ventilation & Air Conditioning Health, Safety and Environmental program, and is required to understand their responsibilities and the current legislation as per the Workplace Safety and Health Act & Regulations. The workers safety Representative will be involved with developing/reviewing safe work plans, will assist with completing or provide review of inspections and investigations, and is provided opportunity to discuss safety issues at toolbox talk.

Toolbox talks are posted either in the workplace and/or shop safety board for all employees to review at any time.

Regulatory Compliance and Safety Program Directives

Northwest Ventilation & Air Conditioning (1977) Ltd has established a hearing conservation program in order to conduct noise exposure assessments. Hearing protection in the form of ear plugs and earmuffs are provided when noise levels are or above 80dBA or when requested by the worker.

A lockout/tag out program is in place to ensure proper safe work and job practices. Employees are required to follow the necessary steps outline in section 7 of the Health, Safety and Environmental program to ensure tools and equipment undergoing repair or maintenance is in a zero-energy state.

A policy and procedure has been written in regards to working alone. It is required that all employees working alone complete the necessary procedure documentation indicating their location, the type of work being performed, and the duration of the time that work will be conducted. The worker and the employee representative then comprise a schedule check in system, if the employee working alone does not check-in at the scheduled time; emergency actions will be taken to contact that employee.

Northwest Ventilation & Air Conditioning (1977) Ltd follows the WHMIS requirements, ensuring all controlled products are all properly labeled and have the correct up to date MSDSs available



on site/in the shop. All employees are required to study, write and pass a WHMIS test annually to demonstrate they understand the hazards of the workplace and all other requirements.

Northwest Ventilation & Air Conditioning (1977) Ltd recognizes the responsibility of prime and sub contractors on the worksite. If we are the prime contractor we provide our subs an orientation which is signed and documented for each sub contractor worker and we include the sub contractor in our inspections. When we are not the prime contractor, we partake in safety meetings if requested and abide by the safety rules of the prime contractor and legislation.

Proper training is the focus in order to prevent hazards and incidents and create a workplace with high regards to safety. It is mandatory that all employees operating equipment are properly trained by a competent individual, as discussed in section 8 of the Health, Safety & Environment program.

It is important for employees to understand ergonomics and the risk of musculoskeletal (MSI) injuries at the workplace. Due to this importance, Northwest Ventilation & Air Conditioning (1977) Ltd has created an Ergonomics program, including annual MSI surveys.

Northwest Ventilation & Air Conditioning (1977) Ltd believes that violence and harassment of any sort are unacceptable in the workplace. To address this, Northwest Ventilation & Air Conditioning (1977) Ltd has created prevention policies for both violence and harassment which are posted on the company safety board and reviewed with employees during orientation. All issues that arise in regard to violence and harassment will be dealt with in accordance with the WSH Act & Regulation.

Section 6: Personal Protective Equipment Policy

Northwest Ventilation & Air Conditioning (1977) Ltd has written this policy to minimize injuries to employees through the use of proper personal protective equipment (PPE).

It is the policy of Northwest Ventilation & Air Conditioning (1977) Ltd to have all employees use CSA Approved personal protective equipment. Approved equipment will be made available by Northwest Ventilation & Air Conditioning (1977) Ltd to all employees.

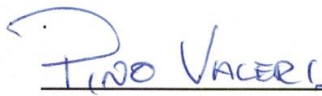
It is the responsibility of all company personnel to wear the personal protective equipment as required for each job. The required personal protective equipment is determined in accordance with WSH regulations, CSA standards, hazard assessments and MSDS sheets. Employees will be made aware of the required personal protective equipment through site orientation, tool box talks, hazard assessments, safe job procedures and MSDS sheets.

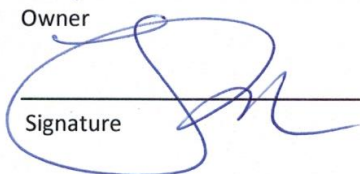
All specialty and general personal protective equipment will be provided at no cost to workers with the exception of safety boots, which workers will be responsible for. All workers are expected to wear CSA approved Grade 1 safety boots with leather uppers and a CSA approved hard hat at all times on all Northwest Ventilation & Air Conditioning (1977) Ltd job sites.

It is the responsibility of the individual to inspect and document, the personal protective equipment before use to ensure it is in good condition, if not, report to the supervisor to have the equipment repaired or replaced.

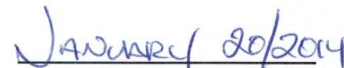
Managers will ensure that the proper personal protective equipment is available and used by workers and guests. On Site training will be provided, by a competent person, to all employees required to use specialized equipment.

Managers, Supervisors and employees will use and maintain the safety equipment as outline in the CSA standards or other applicable standards such as directed in MR 217/2006.



Owner


Signature



Date



Section 12: Statistics and Records

Policy

Northwest Ventilation & Air Conditioning (1977) Ltd. maintains an effective record keeping system, and produces monthly and annual reports in regards to the Health, Safety & Environment Program.

Health and safety records are documented and kept on file at the office for due diligence purposes as well as to assist with loss prevention.

Northwest Ventilation & Air Conditioning (1977) Ltd maintains the following records;

- Worker Orientation records
- Worker and supervisor training records
- Records of all meetings and tool box talks where health & safety issues were discussed
- Near Miss reports
- Inspection reports along with corrective actions
- Investigation Reports
- Documents showing the use of progressive discipline to enforce health and safety rules and regulations.
- Medical certificates, Hearing tests, and first aid records
- Noise exposure testing
- MSI assessments
- MSDS Records
- Monthly safety summaries
- Annual Health, Safety & Environment Program reports, including all audits and corrective actions.

Injury and illness records are used in developing statistics to identify;

- Injury frequency rates
- Injury severity rates
- Average days lost
- Time loss injuries

Trend analysis is produced from all data accumulated under the Health, Safety and Environment program to identify patterns which may lead to the identification of systematic problems not perceived when looking at isolated incidents.

Records and statistics are reviewed at management meeting and Health and safety committee meetings; this process is crucial to identifying hazards not previously identified and outdated or inefficient control measures.



Section 8: Training and Communication

Introduction

Northwest Ventilation & Air Conditioning (1977) Ltd. believes that health and safety training is the foundation of a successful Safety, Health & Environmental Program. Such training will give management, supervisors and workers an appreciation of their personal responsible for health and safety within the framework of the minimum standard outlined by legislation.

Northwest Ventilation & Air Conditioning (1977) Ltd's training starts with an orientation, examining the company's Safety, Health & Environmental program to educate employees on company policies, procedures and responsibilities. The orientation is mandatory for all employees before starting work with Northwest Ventilation & Air Conditioning (1977) Ltd.

Following orientation, Northwest Ventilation & Air Conditioning (1977) Ltd will assess the knowledge and competency of the employee through demonstration, observation and written tests.

Northwest Ventilation & Air Conditioning (1977) Ltd understand the importance of conducting work in a safe manner. Not only is it important for the safety of the employees, but for the health and safety of others around the worksite. Through mandatory site/job specific training and orientation to all employees and sub contractors before starting work, Northwest Ventilation & Air Conditioning (1977) Ltd ensures the worksite is safe.

Northwest ventilation & Air Conditioning will provide refresher and updated training as needed to all employees.

All training records will be maintained in personal files.

In order for proper training to be maintained, communication is mandatory. Safety Meetings are held are every level, site, office and company. Tool box talks will be held weekly and documented in the form of a HIT list. Safety committee meeting will be held at minimum once every 3 months to ensure proper safety and health development and current industry infraction are being discussed, as well as current legislation is being met. Minutes will be recorded and posted on the company health and safety board, readily available for all employees to review. Company meeting will be held including all management to discuss current issues in regards to projects, new training procedures and to review all safety hazards reported, investigation and inspections.

The training strategy's focus is to create a motivated workplace that is capable of meeting new challenges, skilled and competent in all aspects, and will relate directly with Northwest Ventilation & Air Conditioning (1977) Ltd's objective, both short and long term.