

POLICY FOR WORK ON OR UNDER WATER

Potential Risks: Drowning, hypothermia, fall from heights, diving accidents (decompression sickness, nitrogen narcosis, air embolism, etc.).

Objective

This policy establishes the rules that must be applied to prevent risks related to work near bodies of water on construction sites.

Scope



This policy applies to any person under the authority of, and conducting any associated work for, the benefit of EBC or its subsidiaries.

At all times, this policy and procedure should be diligently applied with professionalism and respect for others. In case of doubt or conflict in its application, managers have the responsibility to contact EBC Human Resources management for guidance in its implementation.







Distribution

This policy must be provided to all persons, working both on and off project sites, during their orientation session.

LEGEND

-  The behavior or activity required by the organization.
-  **Important non-compliance for the organization**

Planning

-  A description of the water body or watercourse must be prepared before the work begins. It must contain the type of body of water or watercourse and its characteristics. It must also include a means for knowing the water temperature and climatic conditions in this description. This description must be displayed at the worksite.
-  A description of the work must be prepared before the work begins. This description must contain the place of work, nature of work, number of workers on site, working hours, start and end date of work as well as locations of work areas, meals and rest. In addition, platforms, barges and other workboats must be indicated by specifying their dimensions, their capacity and their respective use. This description must be displayed at the worksite.
-  A water transportation plan suitable to the specific work conditions and characteristics of the water body or watercourse must be developed. This plan must be displayed at the worksite.
-  A rescue plan must be developed before beginning of work. It must be adapted to the specific work conditions and the characteristics of the water body or watercourse. This plan must be displayed at the worksite.
-  The employer must make sure to provide personnel with dive training, or verify that they have the required level of training or certifications depending on requirements.
-  The dive leader must develop a dive plan compliant with the regulations.

Organization

- Anyone who is responsible for transportation or rescue operations must hold the appropriate valid certificate when required by legislation.
- When a boat is expected to be used as part of a rescue plan, it must meet the current standards and regulations.
- An audible alarm system intended to trigger rescue operations and that is not affected by climate change, must be present on the worksite.
- A personal flotation device or lifejacket must meet the current standards and regulations.
- Any diving on a construction site must be carried out with another individual.
- The diving supervisor must ensure that a functional communication system is established between the divers and the team on the surface.
- The employer must ensure that the necessary signage is posted prior beginning work when work is performed in navigable waters.
- The employer must ensure that they establish the necessary measures to reduce the flow of current when it exceeds the amount permitted in diving regulations.
- The employer must ensure that the oxygen supply system and diving equipment meet the current standards.
- Prior to diving, the diving supervisor must ensure that equipment for the standby diver is prepared, assembled and ready for use at all times.
- The employer must be sure to keep a maintenance register for diving equipment and material.

Control

- All divers must make sure they have their updated medical certificate
- Any person working over or near water must wear a personal flotation device or lifejacket because of the inherent risks.
- All divers must be connected to the surface by a compliant safety line.
- The diving supervisor must ensure that no diver exceeds the diving limit for the daily number of hours.
- All divers must make sure to complete the diver's logbook.

If the rules of the main contractor, safety code or any regulation are different than those described above, the strictest shall apply.

Roles and Responsibilities

For the employee, worker, subcontractor, etc.:

Everyone has the obligation to respect and enforce this policy and procedure.

The Manager

The manager ensures compliance of this policy for the staff under their responsibility and ensures that the policy is known by all. In case of conflict, they shall communicate with the human resources department.

Human Resources Management

Human Resources management is responsible for ensuring the updates and distribution of the current policy. They must also oversee administration and determine disciplinary measures deemed appropriate for enforcement.

Disciplinary Measures

The person who does not respect the policy mentioned above will receive:

- 1- A verbal warning stating the correction(s) to be made, documented in the form of a correction or reprimand notice.
- 2- In the case of a repeated offence, a written warning is again written in the form of a correction or reprimand notice and is given to the person and to their superior.
- 3- Subsequently, if there is a recurrence, a write-up along with stricter disciplinary action resulting in an expulsion from the workplace for 1-2 workdays will be given.
- 4- In case of any further recurrence, a third written warning will be provided that can result in dismissal or expulsion from the project or a definite period of time.
- 5- Special Case:
When a person breaches a description for an **Important organization non-compliance**

In this specific case, the task performed must be stopped IMMEDIATELY, the first notice will correspond directly to step number 3 of disciplinary measures and the person will be expelled for a duration of 2 work days.

In case of any further recurrence, step 4 will apply regardless of the number of prior warnings given.

Sources: Occupational Health and Safety Act, Québec.

Definitions:

Surface-Supplied Diving: Means diving where the diver is supplied with a breathing mixture through an umbilical bundle, whether or not an open (wet) bell or a submersible compression chamber is used.