



**HEALTH AND SAFETY POLICY**  
CAPSTONE INFRASTRUCTURE  
CORPORATION  
August 2013  
Last reviewed August 2015

## A Message to Our Employees:



**Michael Bernstein**  
*President and Chief  
Executive Officer*

A key value of Capstone Infrastructure Corporation is to foster a professional, safe work environment where our people have the tools and resources to excel and be successful.

There is nothing more important than the well-being and safety of our employees across our businesses and those who work with us. This Health and Safety Policy (the “Policy”) sets out our approach to managing health and safety. It highlights our guiding health and safety principles, describes our four health and safety goals, and clarifies roles and responsibilities. This Policy will be periodically reviewed and updated.

Our approach to health and safety reflects our commitment to excelling beyond mandatory minimum requirements for health and safety set out by government and regulatory agencies. It is also guided by our belief that all accidents are preventable through diligent risk assessment and identification and control of hazards and the presence of a strong health and safety culture across our company.

Safety is the shared responsibility of everyone at Capstone, from the Board of Directors to each employee. We encourage you to review this policy thoroughly, to internalize our core principles and goals, and to take accountability for your own actions. Together, we can nurture a vibrant health and safety culture that will improve employee wellness while increasing our company’s stability, productivity and future prospects.

Thank you for your continuing commitment and service to Capstone. With your support, Capstone is well positioned to realize its vision of becoming Canada’s pre-eminent diversified infrastructure company.

Sincerely,

A handwritten signature in black ink that reads "Michael Bernstein". The signature is fluid and cursive, with the first name clearly legible and the last name written in a more stylized, connected script.

**Michael Bernstein**  
President and CEO

## Scope

This policy statement applies to all of Capstone's businesses and supports the aims of the occupational health and safety laws and regulations in the jurisdictions where Capstone operates. At a minimum, our businesses must fully comply with all appropriate laws and with internal procedures.

We encourage all businesses to foster a culture of continuous improvement in health and safety performance and in the use of equipment and techniques that will minimize risk. We expect our businesses to ensure that staff, contractors, members of the public and any other third party who may be affected by our business activities, are not injured or exposed to unnecessary risks to their health or safety.

It is a business priority and crucial company goal of ours to achieve and sustain an industry-leading health and safety record and maintaining a proactive and collaborative health and safety culture.

This Policy is designed to provide and maintain a safe and healthy working environment and to achieve full compliance with applicable health and safety laws.

## Core Principles

- Capstone expects its businesses to build and encourage a proactive health and safety culture that is open, cooperative, constructive and collaborative, thereby allowing the exchange of ideas between management, staff and contractor partners to improve the existing working environment.
- All employees must take direct responsibility for their own personal safety as well as that of their colleagues and others who may be affected by their activities or omissions. Participation and insight from every employee is essential to the sustainability of our health and safety culture and of our business overall.
- As part of our culture to continuously improve health and safety, all businesses must strive to learn from historical incidents, take appropriate and timely action to prevent recurrence, and track the results over time to verify that root causes have been addressed. Doing so will heighten responsibility to help prevent future incidents of a similar nature from occurring.

These core principles benefit everyone by encouraging accountability that results in increased stability, productivity and wellness across our businesses. Consistent and continuous efforts by all employees will reduce risk and liability to themselves and to others and that can negatively affect the business. The results of Capstone's health and safety program will strengthen our business and profile as a committed corporate citizen.

## Goals

- **Achieve zero accidents at our businesses and instill an industry-leading safety culture.** We seek to grow beyond our prior accomplishments, avoid complacency and progress together as a team to make zero accidents an attainable goal.

- **All accidents or near misses are preventable.** When planning to engage in an activity or task, employees will perform a thorough risk assessment. The risk assessment process is the foundation for safe working practices and procedures.
- **Identify the root causes of all incidents.** In the event of an incident, all who work for or with us are expected to cooperate with and learn from the investigation.
- **Assess the businesses' health and safety performance quarterly and annually.** A health and safety assessment will be calculated on a quarterly and annual basis. The reporting requirements for the power assets are covered in "**Reporting of Health and Safety Data by Power Operations**". Capstone's other businesses may use this document as a reference in developing their guidelines for specific reporting requirements and key performance indicators.

## Site Approach

While safety is everyone's responsibility, local occupational health and safety laws govern the formal structure of Capstone's health and safety approach.

In some locations, a joint health and safety committee (JHSC) may need to be established to manage health and safety policies and practices. This committee shall comprise of at least two employee representatives and two management representatives.

At locations where a JHSC is not required and has not otherwise been voluntarily established, the manager responsible for the site, in cooperation with the safety representative responsible for the site, shall manage the health and safety concerns of the business and may elect to establish a volunteer safety committee to support the communication and monitoring of health and safety practices.

The health and safety committee or manager and site safety representative shall ensure that as a minimum:

- Capstone's health and safety policy is posted and effectively communicated to each employee.
- A local health and safety manual is developed and made available to every employee for review. The contents of each manual will include information on the following topics:
  - Incident reporting procedures;
  - Incident investigation procedures;
  - Workplace Hazardous Material Information System (WHMIS);
  - Safety orientation and training;
  - Workplace Safety Inspections;
  - First Aid arrangements and procedures;
  - Driver Licensing program for site vehicles, if appropriate;
  - Health and Safety monitoring and reporting procedures; and
  - Other information deemed advisable or necessary by local management and/or the JHSC or site safety representative, for the protection of

employees.

- The business develops and publishes an Emergency Preparedness Plan outlining procedures to be followed in the event of an emergency arising from fire, theft, break-in, bomb threats, power failure, or natural disasters. Employee emergency response training, including fire training and drills, shall be conducted on a regular basis.
- A site's health and safety policies, plans, and practices comply with the legal requirements governing the location.

Disciplinary action up to and including termination may be taken against any employee who fails to observe this policy or who violates established workplace safety requirements.

## **Responsibilities**

Capstone exercises its responsibility for health and safety through its **Asset Managers**. These managers must:

- Ensure this Policy is translated into effective action at all levels within their operations;
- Provide adequate financial resources and personnel to implement this Policy effectively and efficiently.;
- Promote an interest in, and enthusiasm for, health and safety matters and set high personal standards as an example to others; and
- Provide a confidential support service for those who require assistance with drug, alcohol and stress-related personal issues.

**Supervisors** are responsible for health and safety within their own group and are expected to:

- Monitor their group's health and safety performance and take steps to continuously improve health and safety standards;
- Educate and ensure necessary training for their group on their health and safety responsibilities;
- Ensure that adequate health and safety procedures are in place within their group by ensuring an active role is taken in foreseeing, preventing and controlling hazards;
- Personally promote an interest in, and enthusiasm for, health and safety, and set high personal standards; and
- Take responsibility for health and safety issues associated with day-to-day activities and ensure that:
  - All health and safety policies, procedures and working instructions, where appropriate, are implemented within their group sections;
  - Any reports of hazards, risks or shortfalls that have the potential to cause harm are acted upon in an appropriate and timely manner;
  - Information regarding health and safety is adequately communicated to all staff within their group; and

- Accidents, near misses, operational incidents involving health and safety, and dangerous occurrences are promptly reported to the Site Safety Representative and Manager and investigated. The results of any investigation must be discussed with the entire group at the next safety meeting or communicated by any other appropriate means.

**All Staff** are expected to act in a responsible manner and take reasonable care of themselves, their colleagues and others affected by their activities or omissions. **Everyone** is required to avoid careless or hazardous behavior, especially horseplay, which may endanger themselves and others.

- Adhere to company policies, safe working practices and other instructions at all times;
- Use all tools, materials and equipment safely and in accordance with training and instructions;
- Inspect, maintain and use personal protective equipment when appropriate to do so;
- Carry out a proper and sufficient risk assessment before starting a task and when circumstances change;
- Immediately report any incident or near miss that occurs to the site manager, supervisor or to the site safety representative;
- Report any hazard, risk or shortfall to their site manager, supervisor or to the site safety representative;
- Take an active and personal interest in promoting health and safety at work; and
- Personally promote an interest in and enthusiasm for health and safety matters and set high personal standards as an example to others, especially their colleagues and trainees.

The **Site Safety Representative** reports directly to the Site Manager (or Capstone Asset Manager if needed) and is required to:

- Review, understand and assist in revising the health and safety policy and its associated directives, procedures and working instructions;
- Provide information, advice, assistance and support on health and safety matters to all staff;
- Provide professional advice on technical, legal and other health and safety matters;
- Liaise with bodies employed in the enforcement of health and safety matters; and
- Personally promote an interest in and enthusiasm for health and safety matters and set high personal standards as an example to others.

## **Monitoring and Compliance**

Capstone details the requirements for reporting and provides guidance to all businesses on the procedures for monitoring and reporting health and safety-related matters. The reporting requirements for the power assets are covered in “**Reporting of Health and Safety Data by Power Operations**”. This document is used to review and update the Health and Safety Policies and Procedures made at the local level. Capstone’s other businesses may use this document as a reference in developing their guidelines for reporting requirements.

The Site Managers are responsible for ensuring all health and safety activities are recorded in meeting minutes or other appropriate forms so that the statistical data can be retrieved for reporting purposes. This includes sickness absence records. All incidents are investigated and lessons learned. Where necessary, procedures and processes are altered to reflect these lessons.

It is also incumbent on the Site Manager and Health and Safety Committee/Site Safety Representative to ensure there is an annual review of the Health and Safety Manual, Emergency Preparedness Plan and other local processes and procedures in order to seek improvements and updates.

*This Policy Last Reviewed – August 2015*