

Muskrat Falls Projects

Gender Equity and Diversity
Program

July 2014



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1. INTRODUCTION

The development of Muskrat Falls¹ on the lower Churchill River in Labrador will provide a clean, renewable source of electricity to meet Newfoundland and Labrador's growing energy demands. Its development will provide homes and businesses with stable electricity rates well into the future, and will be a valuable power-producing asset for more than 100 years.

The development of Muskrat Falls represents the first phase of development on the lower Churchill River. The development includes:

- *Muskrat Falls Generating Facility*, an 824 megawatt (MW) hydroelectric generating facility consisting of two dams and a powerhouse at Muskrat Falls in Labrador.
- *Labrador-Island Transmission Link*, an 1,100 km High Voltage direct current (HVdc) transmission line from Muskrat Falls to Soldiers Pond on the Avalon Peninsula, including a 35 km subsea cable across the Strait of Belle Isle.
- *Labrador Transmission Assets*, two 250 km High Voltage alternating current (HVac) transmission lines between Muskrat Falls and Churchill Falls.

These are collectively referred to as the Projects.

The Government of Newfoundland and Labrador sanctioned the development of Muskrat Falls in December 2012. Construction is expected to take five years to complete.

The Lower Churchill Management Corporation (LCP) was established to manage the construction of the Projects as described above; LCP commits to apply the principles established in this Program throughout construction of the Projects.

¹ See more at: <http://muskratfalls.nalcorenergy.com/project-overview/>

2. GENDER EQUITY & DIVERSITY PROGRAM STRUCTURE

This document describes LCP's plan to integrate gender equity and diversity principles, values and practices in the Projects. The document presents:

- The provincial regulatory requirements and contract terms outlined in the Lower Churchill Projects Benefits Strategy (Benefits Strategy), the Lower Churchill Innu Impacts and Benefits Agreement (IBA) with the Innu Nation, and collective agreements.
- Nalcor Energy's vision and values with respect to gender equity and diversity, which apply to all of its subsidiaries, including LCP.
- Nalcor's experience with gender equity and diversity (GED) initiatives.
- LCP's goals and objectives for the LCP Gender Equity and Diversity Program (Program).
- LCP's implementation and evaluation methodology.

The Program reflects the requirements of the Government of Newfoundland and Labrador (the Province) and the terms of the negotiated benefits agreements, IBA and collective agreements. Further, it builds on and extends Nalcor's experience as an employer committed to gender equity and diversity in the workplace.

It is LCP's goal that Muskrat Falls will be a model project demonstrating innovation and creativity in developing and implementing best practices in gender equity and diversity. Through its own diversity program and through its management of the hydroelectric Projects in its mandate, Nalcor seeks to position positively the creation and ongoing support of a respectful, inclusive and diverse work culture as a desirable business practice. LCP believes the Program will also contribute to workplace safety through increased collaboration and respect, which is a priority for Nalcor and one of its corporate goals.

The Program is guided by the commitment to support employment opportunities for Labrador and for Newfoundland residents as per the Benefits Strategy.

LCP recognizes the lives of women and members of underrepresented groups are different from those who have primarily participated in large-scale industrial development; it also recognizes equal opportunity has not necessarily translated into equitable levels of participation. Thus, the Program includes employment plans and business access strategies for women, Aboriginal people, visible minorities, and persons with disabilities. As initiatives and accompanying tactics for women and diversity groups are often similar, the Program combines both to avoid duplication. The Program does, however, reflect particular considerations for specific populations as necessary and appropriate.

The Program informs all contracts, purchasing and employment agreements managed by LCP. All contractors and subcontractors are required to support this Program as per the nature of their work associated with the Projects. This Program applies to all LCP facilities, sites and offices within the province.

Oversight of the Program's implementation is provided through LCP's Executive Committee, which includes the following representatives:

- Gilbert Bennett, Vice President – LCP
- Paul Harrington, Project Director – LCP
- Dawn Dalley, Vice President, Corporate Relations, Nalcor
- Gerard McDonald, Vice President, Human Resources and Organizational Effectiveness, Nalcor

LCP's Gender Equity and Diversity Coordinator is responsible for the management and implementation of the Program, and is assisted by the GED Working Group, to advance the following objectives:

- Build partnerships with labour, education, government, and communities of interest (women, Aboriginal people, people with disabilities, and visible minorities) and their representative organizations;
- Facilitate awareness and understanding of GED among LCP employees, workers, contractors, unions and partners; and
- Monitor implementation of GED initiatives to assess outcomes.

LCP, its contractors and unions will work together with government and stakeholders to implement this Program and to achieve its objectives and goals. LCP is committed to continuous improvement and will review and monitor these plans and strategies throughout the construction period of the Projects to ensure the Program's success.

3. REGULATORY AND CONTRACTUAL REQUIREMENTS

3.1. Provincial Requirements

In its 2007 Energy Plan, Focusing our Energy, the Government of Newfoundland and Labrador stated:

“An available and a diverse workforce is critical to the success of our energy Projects and the growth of the provincial energy economy.”

LCP is committed to the principles outlined in the Energy Plan with respect to the construction of the Projects.

In keeping with these principles, the Benefits Strategy has been established with the Province of Newfoundland and Labrador. The Benefits Strategy outlines the necessary requirements to provide opportunities and benefits for the people of the province. It includes clear obligations to gender equity and diversity, with an overall objective to address employment equity and business access for traditionally underrepresented groups. This Program is the cornerstone for optimizing the benefits of the Projects for all people of Newfoundland and Labrador.

3.2. Lower Churchill Impacts and Benefits Agreement

In recognition of the claim by the Innu of Labrador to Aboriginal rights and title in the area of the Projects, Nalcor has entered into an Impacts and Benefits Agreement (IBA) with Innu Nation to address Innu interests.

Nalcor has made IBA commitments regarding employment and training, workplace policies, business opportunities and environmental management, including specific initiatives regarding women. In addition to its IBA commitments, Nalcor has undertaken additional initiatives to enhance employment and training opportunities for Labrador Innu. These commitments are important elements of LCP’s objectives to support a diverse workplace, and the Program is consistent with Nalcor’s IBA commitments.

3.3. Applicability of the Program to Project Construction Activities

As per the Benefits Strategy, this Program applies to work on the following:²

- Construction of the Muskrat Falls hydroelectric generating station
- Construction of the Labrador Transmission Assets in Labrador
- Construction of the Labrador Island Transmission Link.

² The initiatives, goals and objectives for the Program will be reassessed prior to a sanction decision for the Gull Island project.

3.4. Hiring Priority

The Benefits Strategy has established adjacency-based employment protocols:

For the construction of the lower Churchill generating stations at Gull Island and Muskrat Falls and associated High Voltage alternating current (HVac) transmission facilities in Labrador, the hiring protocol is as follows:

1. Qualified Labrador Innu as per the IBA
2. Qualified residents of Labrador
3. Qualified residents of Newfoundland
4. Qualified residents of Canada
5. Qualified non-Canadians

and for construction of the Labrador-Island Transmission Link (LIL), as follows:

1. Qualified Labrador Innu for work in Labrador as per the IBA
2. Qualified residents of Newfoundland and Labrador
3. Qualified residents of Canada
4. Qualified non-Canadians

3.5. Benefits Strategy Gender and Diversity Requirements

The Benefits Strategy outlines the following requirements to be incorporated into the Gender Equity and Diversity Program, as noted on pages 7-9 of the Benefits Strategy:

Gender Equity Plan

The objectives of the Gender Equity Plan will be to address employment equity for the Projects, including access to employment opportunities for and employment of qualified women in the Projects, with an emphasis on continuous improvement. The plan will implement proactive programs and practices that contribute to the creation of an inclusive work environment and corporate culture. The plan will promote accountability and responsibility for gender equity.

The Gender Equity Plan shall include a women's employment plan and business access strategy (WEP) in which LCP will establish quantitative goals for employment of women at all phases of the Projects. LCP will initially set such goals by taking into account the availability of women in particular occupational categories as identified by Statistics Canada in its Employment Equity Data Report. The WEP will institute ongoing programs and processes to facilitate employment and participation for women in all phases of the Projects, and at all facilities, sites and offices in the Province where work performed by LCP and its primary contractors relating to the Projects is taking place.

The WEP will include the following provisions:

- LCP will put in place the necessary organizational resources to develop and implement the WEP;
- LCP will support training and recruitment programs for women in consultation with training and educational institutions in the Province;
- LCP will provide facilities for the Projects that are accommodative of women, and will require a safe and respectful work environment;

- LCP will require that each primary contractor to the Projects provide LCP with a plan for compliance with the WEP, and will require that contracts related to the execution of the Projects include an acknowledgement from the successful bidder that they are aware of the existence and importance of the WEP;
- LCP will identify and implement special measures to attract and secure employment of women in occupations where women are under-represented, including setting longer term qualitative goals to employ more women in occupational areas where women are historically under-represented;
- LCP will develop an implementation schedule and will report on progress to the Government; and
- LCP will consult on development and progress on the WEP in an annual consultation with the Government and other stakeholders, including community groups.

Diversity Plan

The objectives of the Diversity Plan will be to address employment equity for the Projects, including access to employment opportunities for and employment of qualified members of underrepresented groups in the Projects, with an emphasis on continuous improvement. The plan will implement proactive programs and practices that contribute to the creation of an inclusive work environment and corporate culture. The plan will promote accountability and responsibility for diversity.

The Diversity Plan shall include a business access strategy for underrepresented groups in which LCP will establish quantitative goals. The Diversity Plan will institute ongoing programs and processes to facilitate employment and participation for underrepresented groups in all phases of the Projects, and at all facilities, sites and offices in the Province where work performed by LCP and primary contractors relating to the Projects is taking place.

The Diversity Plan will include the following provisions:

- LCP will put in place the necessary organizational resources to develop and implement the Diversity Plan;
- LCP will support training and recruitment programs for disadvantaged groups in consultation with training and educational institutions in the Province;
- LCP will require that each primary contractor to the Projects provide LCP with a plan for compliance with the Diversity Plan, and will require that contracts related to the execution of the Projects include an acknowledgement from the successful bidder that they are aware of the existence and importance of the Diversity Plan;
- LCP will develop an implementation schedule and will report on progress to the Government; and
- LCP will consult on development and progress on the Diversity Plan in an annual consultation with the Government and other stakeholders, including community groups.

3.6. Collective Agreements

The majority of people working on the Projects will be employed by contractors and will work in a unionized environment. This Program has been considered during the negotiations for the collective agreements specific to each component of the Projects.

The collective agreements are as follows:

1. The collective agreement between Muskrat Falls Employers' Association Inc. and Resource Development Trades Council of Newfoundland and Labrador for the Construction of the Lower Churchill Hydroelectric Generation Project at Muskrat Falls on the lower Churchill River Newfoundland and Labrador (MFEA and RDC)³;
2. The Lower Churchill Project Transmission Construction Collective Agreement between Lower Churchill Transmission Construction Employers' Association Inc. and International Brotherhood of Electrical Workers and IBEW Local Union 1620 (LCTCEA and IBEW 1620)⁴; and
3. The Lower Churchill Reservoir Clearing Collective Agreement between Lower Churchill Reservoir Clearing Employers' Association Inc. and Labourers International Union of North America and Construction and General Labourers' Union, Rock and Tunnel Workers Local 1208 (LCRCEA and Local 1208)⁵.

The specific clauses that relate to gender equity and diversity in each of the collective agreements are included in Appendix A.

³ http://www.gov.nl.ca/lra/collective/pdf/naics22/MFEA_RDTCNL_2012_2017.pdf

⁴ http://www.gov.nl.ca/lra/collective/pdf/naics22/LCT_CEA_IBEW_2012_2017.pdf

⁵ http://www.gov.nl.ca/lra/collective/pdf/naics22/LCRC_Collective_Agreement_2012_2017.pdf

4. CORPORATE AND PROJECT POLICIES AND REQUIREMENTS

4.1. Application of Corporate Policies

The application of Nalcor's corporate strategies and principles is an important consideration in the development of Project-specific plans by LCP, as it is a subsidiary of Nalcor.

4.2. Nalcor's Core Values

The development and implementation of the Program is guided by Nalcor's Core Values:

Open Communication

Fostering an environment where information moves freely in a timely manner

Accountability

Holding ourselves responsible for our actions and performance

Safety

Relentless commitment to protecting ourselves, our colleagues, and our community

Honesty and Trust

Being sincere in everything we say and do

Teamwork

Sharing our ideas in an open and supportive manner to achieve excellence

Respect and Dignity

Appreciating the individuality of others by our words and actions

Leadership

Empowering individuals to help guide and inspire others

4.3. Nalcor's Diversity and Inclusion Strategy

In 2010, Nalcor developed its Diversity and Inclusion Strategy and a multi-year action plan. Nalcor's Leadership Team formally endorsed the strategy in early 2011. As part of the strategy's action plan, Nalcor established a Diversity Council to help foster employee engagement with the strategy and to promote its tools for increasing diversity and inclusion practices within the company.

The Diversity Council provides advice to the Human Resources (HR) Department on diversity issues and initiatives as Nalcor continues to move forward with its strategy. The Council is made up of about a dozen employees throughout the organization, representing different backgrounds and levels of management.

Other activities carried out since the development of the new strategy include the integration of diversity commitment into public recruitment ads, reviewing/developing HR and employment policies, and identification of external groups/associations with whom Nalcor may wish to work with in regards to diversity/inclusion initiatives.

Work has been ongoing since spring 2013 to develop part one of a two-part workshop series that will lay the ground work for the implementation of the Diversity and Inclusion Strategy. The pilot launched in August 2013 and with refinements added to the session in September 2013.

Nalcor's Diversity and Inclusion Strategy has as its primary goal: *Building and maintaining a skilled and high performing workplace environment that is respectful and accepting of individual differences and experiences resulting in innovation, creativity, and competitiveness.*

The company has identified several best practices on which to base the development and implementation of its diversity framework:

- **Leadership commitment** from senior management and the board is essential.
- **Passion** from middle managers and directors has enabled the program to build slowly but steadily in the company.
- **Community engagement with key leaders** in target groups has led to strong relationships and unexpected benefits and opportunities.
- **Openness to learning is critical.** Learnings and experiences of others provide valuable input. Adaptive approaches are required, as initial concepts may need modification in order to better achieve goals.
- **Creating a workplace where questions are supported and encouraged** means supporting the conversation about what diversity and inclusion means to employees and their communities.

These values and best practices have been integrated in the Program for LCP as Nalcor aims for congruency with its diversity framework across all projects arising from its lines of business. The LCP GED Program combines efforts in recruitment and employment with robust equity and diversity policy to increase the presence and contributions of underrepresented groups resulting in a positive workplace culture on LCP worksites and in the future, elsewhere within Nalcor.

4.4. Code of Conduct and Business Ethics Handbook

Nalcor is dedicated to developing a work environment conducive to productivity and effectiveness and which enables employees to demonstrate Nalcor's values, with an emphasis on respect, dignity and teamwork in achieving its vision for diversity and inclusion:

“Our workplace is described as an inclusive and respectful one. We collectively believe that diversity of backgrounds, ideas and experiences enriches our company and contributes to an innovative, high performance environment. We embrace individual differences and enable each other to reach our full potential.

Nalcor's employees are guided in this goal by the company's code of conduct and business ethics. The handbook outlines the specifics of the company's vision and values reflected in everyday work practice. The handbook states:

“Nalcor employees deserve to work in an environment where they are treated fairly and with respect. We must all take steps to ensure we are respectful of others, supportive of the dignity and self-esteem of every person and promote an environment that is free of harassment. The importance of

treating each other with respect applies to all Nalcor employees, regardless of their role or position.”

4.5. Nalcor’s Position on Respectful Workplace Policy

Nalcor identifies behaviours the company will not tolerate in its workplace. These are: harassment, discrimination, diminishment of personal dignity and mutual respect, and the posting of offensive material in the workplace. Nalcor believes a respectful workplace is a safe workplace and that supporting gender equity and diversity will contribute positively and effectively to its primary goal of safety.

4.6. LCP Workplace Policy and Respectful Workplace Standard

LCP will develop and integrate Nalcor’s position on workplace policy into the Project worksites. LCP is committed to maintaining a safe, healthy and productive work environment where all persons attending LCP worksites are valued and treated with respect and dignity.

LCP will develop a Respectful Workplace Standard that supports Nalcor’s core values. This standard will apply to all LCP employees and consultants, LCP contractors, visitors, and others attending the LCP worksites. In addition, contractors working on LCP worksites will be required to have a Respectful Workplace Policy that meets or exceeds Nalcor’s Respectful Workplace Standard.

The Respectful Workplace Standard is intended to support a work environment that is free of discrimination, harassment, workplace violence and/or threats of workplace violence. The Respectful Workplace Standard will effectively transmit policy requirements to frontline staff as expectations for appropriate behaviours supporting respect and dignity in the workplace that is consistent with the company’s safety goal.

Details on the LCP Respectful Workplace Standard will be included in the LCP Site Handbook provided to everyone working on an LCP worksite. A copy of the LCP Site Handbook is in Appendix D.

5. GENDER EQUITY AND DIVERSITY INPUT AND STRATEGIC CONSIDERATIONS

5.1. Stakeholder Perspectives and Contributions

Nalcor and LCP developed the Gender Equity and Diversity Program through an extensive consultation process. Nalcor began its work on the Program in 2009 by meeting with organizations in individual meetings and structured open sessions. Later, LCP invited more than 40 community agencies, non-governmental organizations, and government agencies to provide input and to share information regarding priorities for the Gender Equity and Diversity Program. Consultation was, and will continue to be, carried out in accordance with LCP's consultation principles and includes an evaluation process. Feedback forms are utilized as appropriate.

The focus group sessions started in May 2012 and identified a number of key themes to guide the Projects in the development and implementation of this Program:

- Establish measurable goals for participation by underrepresented groups in the construction of the Projects.
- Facilitate LCP's involvement and support in workforce preparation, supplier development, and gender equity and diversity-related training to ensure all Newfoundlanders and Labradorians can avail of project opportunities.
- Recognize contractor and union adherence and support as key factors to successful implementation of the GED Program.
- Make regular public reports to stakeholders so that the fulfillment of commitments is documented and areas with potential for improvement can be identified.
- Include specific mitigations to the GED Program to address unique barriers for each underrepresented group considered in the Program.
- Work with committed stakeholders to bring their respective expertise, to implement a successful Program.

The preceding points have shaped LCP's approach to implementing gender equity and diversity on the Project and have provided a foundation for this document.

- Results and comments from the consultation process are provided in Appendix B.

5.2. Unique Project Considerations

The development of initiatives will need to consider the location and nature of Project activities, as well as the Projects' rotation and shift schedules for work.

Given the hiring preference for Labrador Innu and Labrador residents in the Benefits Strategy, efforts to increase female participation in Labrador will need to focus on increasing the supply of female workers who are also Labrador residents. Similarly, work at a remote site introduces the requirement that workers be away from home for extended periods. Recognizing this potential barrier for workers who have family care obligations (and a potential preference for other local projects), initiatives that increase the supply of local female workers should be considered.

5.3. Evaluation of Best Practices

LCP has completed an extensive review of best practices and has consulted extensively with key stakeholders to ensure that this Program contains the components necessary for successful implementation. A list of resources and consulted stakeholders is available in Appendix C.

6. PROGRAM GOALS, OBJECTIVES, INITIATIVES AND TARGETS

6.1. Goals and Objectives

The Program incorporates two major focus areas based on: 1) employment and 2) business access strategies across four underrepresented groups: women, Aboriginal people, persons with disabilities, and visible minorities.

The employment strategy addresses four key objectives:

- Increase the level of capacity in the four underrepresented groups to access work on the Projects;
- Ensure the recruitment and hiring processes use available resources from the four underrepresented groups and provide opportunities for new entrants to the workforce from the four underrepresented groups;
- Ensure that workplace and working conditions support the retention of workers from the underrepresented groups and contribute to an inclusive and supportive work environment; and
- Ensure successful implementation of the Program through continuous improvement and adaptive management measures.

The overarching goal of the Program's business access strategy is to ensure full and fair opportunity for work associated with the Projects to businesses owned by the underrepresented groups, recognizing that IBA commitments must be met as a first priority. The Program's key business access objectives are:

- Build awareness of the breadth of opportunities associated with the Projects (including direct, indirect, and induced opportunities) and LCP's procurement requirements to help link businesses owned by underrepresented groups with opportunities in the supply chain, and
- Ensure an understanding of the processes used by LCP for procurement.

6.2. Employment Strategy Initiatives

6.2.1. Capacity Building

LCP has, and will continue to, partner with organizations advocating for underrepresented groups to build capacity with regard to workforce and supply chain preparation and development. These include but are not limited to:

- Participating in WRDC's Techsploration and other programs.
- Delivering safety training to members of Innu Nation and women interested in Project employment.
- Participating in round table discussions regarding childcare options in Upper Lake Melville.

- Supporting profile entries in the LCP online employment database muskratfallsjobs.com

LCP supports the Labrador Aboriginal Training Partnership (LATP), which has been the primary vehicle to increase the capability of Aboriginal Labradorians to participate in the Projects and in other developments in Labrador. Through the co-operation of Innu Nation, NunatuKavut Community Council, the Nunatsiavut Government, the Government of Canada, the Government of Newfoundland and Labrador, and LCP, LATP has been successful in training over 500 individuals and has accessed over \$46 million in funding to advance training initiatives.

Initiatives of the LATP include:

- Providing tuition funding, living allowances, and childcare allowances for Aboriginal people who wish to train for opportunities associated with the Projects.
- Providing career counseling for Aboriginal people.
- Providing Project-related community-based training.
- Providing high-school equivalency testing, including oral testing for those who do not speak English as their first language.
- Providing in-class interpreters/translators or co-instructors when requested.
- Coordinating an apprenticeship pilot in which one journey person can sign off hours for up to five apprentices.
- Coordinating on-the-job training opportunities for Aboriginal people.

Consistent with the priority hiring protocol for Labrador Innu and Labrador residents, increasing Labrador workforce capacity increases the extent to which local residents benefit from the Projects.

LATP has also extended its services to Labrador women who are not Aboriginal people to enhance the gender equity and diversity goals and objectives for the Projects.

Initiatives to increase the level of capacity in the underrepresented groups to access work on the Projects are described in Table 1 on the following pages.

The reduction of barriers to employment for members of the underrepresented groups is an important measure to increase employment levels. Initiatives intended to show that members of the underrepresented groups are working on the Projects and to assist others in considering work on the Projects (and construction Projects work in general) as a viable career are provided in Tables 1 and 2. These initiatives are also intended to provide feedback to identify potential issues so LCP may take action to reduce existing barriers on the work site.

Table 1: CAPACITY BUILDING INITIATIVES

Initiative	Groups ⁶				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Offer pre-employment orientation to members of underrepresented groups.	*	*			Benefits Team	Ongoing since sanction
Category: Partnerships						
Participate in the LAMP which provides tuition funding, living allowances, and childcare allowances for Aboriginal people who wish to train for opportunities associated with the Projects.		*			Benefits Team	Ongoing to Q1 2015
Work with Memorial University, CNA and other registered training institutions to support increased participation of women, Aboriginal people, people with disabilities, and visible minorities in training and education programs through the provision of scholarships and training opportunities.	*	*	*	*	Communication, Benefits Team	Ongoing
Partner with Women in Resource Development Council (WRDC) and the Office to Advance Women Apprentices (OAWA) to develop a training-to-employment initiative for women, including on-the-job training opportunities where feasible.	*				Benefits Team	Ongoing
Support awareness initiatives and programs offered by government and stakeholders encouraging women and underrepresented groups to explore trades and technology.	*	*	*	*	Benefits Team	Ongoing
Work with College of the North Atlantic (CNA), union training schools and other training institutions to ensure students (past and present) are aware of job opportunities associated with the Projects and the necessary skills required.	*	*	*	*	Benefits Team, Project Leadership	Ongoing
Participate in and support education events hosted by educational and training organizations related to the Projects.	*	*	*	*	Benefits, HR	Ongoing

⁶ W – Women A – Aboriginal People PD – Persons with disabilities VM – Visible Minorities

Initiative	Groups ⁶				Responsible	Schedule
	W	A	PD	VM		
Support WRDC and OAWA through partnership development and sponsorship.	*				Benefits Team, Communications	Ongoing
Provide community investment support through Nalcor’s corporate Community Investment Program, for non-profit groups and organizations aimed at assisting the underrepresented groups.	*	*	*	*	Communications	Ongoing
LCP, its contractors and unions will work with stakeholder organizations and governments, including Child, Youth and Family Services (CYFS) to assess the need for caregiving solutions and to develop an appropriate response in the region adjacent to the Projects resulting in creative and adaptable options for childcare in keeping with provincial regulations.	*				Benefits	Ongoing
LCP will support and promote early childcare education programs in the Upper Lake Melville Region through <ul style="list-style-type: none"> o Identification of potential caregiving resources o Promotion of information on child care resources o Support for the recruitment of additional child care professionals through the provision of scholarships to aid students enrolled in early child care education at a registered training institution o Investigation of opportunities to facilitate increased access to childcare. 	*				Benefits	Ongoing

6.2.2. Recruitment and Hiring Processes

The Program is predicated on supporting gender and employment diversity as a key principle for business success and in developing and providing tools which will facilitate this approach.

LCP's website, muskratfallsjobs.com, supports recruitment for the Projects. The site allows workers to register and provide key hiring information, such as residency, experience, training, and affiliation in the underrepresented groups.

The website is promoted as a hiring resource with potential workers, contractors, and unions. LCP will also use its website data as appropriate and necessary to identify qualified members of underrepresented groups.

LCP has developed resources to assist individuals in completing an online profile, including: a step-by-step information brochure and a video that explains the process of creating and editing an employment profile.

LCP also assists individuals by working directly with them to create and edit their online profile.

LCP hosts employment information sessions to deliver information to stakeholders, including the underrepresented groups identified in the Program.

In addition to LCP's recruitment activities listed above, each union maintains an out-of-work list for the Projects.

Further initiatives to ensure the recruitment and hiring processes information and resources are accessible to the underrepresented groups are described in Table 2.

Table 2: RECRUITMENT AND HIRING INITIATIVES

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Include a gender equity and diversity inclusion statement in recruitment materials related to LCP.	*	*	*	*	Communications, HR	Ongoing
Provide underrepresented groups with Project information to ensure members of key target audiences are informed of available employment and training opportunities.	*	*	*	*	Benefits, Communications	Ongoing
Communicate muskratfallsjobs.com website to potential workers via direct engagement, information brochures, videos, and through traditional and social media.	*	*	*	*	Communications, HR	Ongoing
Hold employment information sessions and hiring events (job fairs, etc.) and encourage members of the underrepresented groups to register on muskratfallsjobs.com during the event.	*	*	*	*	Communications, Consultation	Ongoing
Provide information sessions to contractors and sub-contractors on how to use the employment database to meet their hiring needs re: diversity and equality.	*	*	*	*	Benefits	Ongoing
Dedicate resources to ensure members of the underrepresented groups understand the job application process, including the role of contractors and unions, and how to register with the employment database muskratfallsjobs.com. Provide information to assist users in navigating and registering in the database.	*	*	*	*	Benefits, HR, Communications	Ongoing since Oct 2012
Dedicate resources to provide hands-on assistance to members of the underrepresented groups to register on the employment database muskratfallsjobs.com.	*	*	*	*	Benefits, Communications	Ongoing since Oct 2012

Hold province-wide recruitment and employment information sessions and use stakeholder and government networks to invite/ensure individuals from the underrepresented groups are aware and can participate.	*	*	*	*	Communications, Consultation, Benefits	Ongoing since sanction
Participate in events such as conferences, career fairs, and other events applicable to LCP, that promote participation/awareness in the trades among the underrepresented groups.	*	*	*	*	Benefits, HR, Communications, Consultation	Ongoing
Ensure recruitment information is available in accessible formats and plain language upon request.		*	*	*	Benefits, Communications	Ongoing
Develop Project promotional and communications materials using positive images and articles/profiles that highlight role models from the underrepresented groups working on the Projects.	*	*	*	*	Communications	Ongoing
Use traditional and social media to promote employment opportunities for the Projects.	*	*	*	*	Communications	Ongoing
Use appropriate language and imagery in all job ads to encourage members of the underrepresented groups to apply for job opportunities.	*	*	*	*	Communications, HR	Ongoing
Use visual representation of the underrepresented groups in print and electronic public education and promotional materials.	*	*	*	*	Communications	Ongoing
Category: Compliance						
Integrate progressive apprenticeship ratios in Project collective agreements by <ul style="list-style-type: none"> ○ Ensuring affiliation re: Gender and Aboriginal is a consideration in the hiring of qualified apprentices ○ Maximizing use of available apprenticeship programs to assist LCP and its contractors in recruiting/hiring individuals from the target groups. 	*	*	*	*	HR	Ongoing

Monitor the Muskrat Falls employment database for potential workers from the underrepresented groups and advise applicable contractors and unions.	*	*	*	*	Benefits	Ongoing since Oct 2012
Qualified workers will not be required to be members of the union to be referred to bargaining unit positions. They will be represented by the union once employed.	*	*	*	*	HR	Ongoing
Potential workers/workers will be asked for recruitment purposes or on point-of-hire if accommodation measures are required due to a diagnosed disability, and these will be implemented where feasible.			*		HR	Ongoing
Category: Partnerships						
Work with/train stakeholder groups on the use of muskratfallsjobs.com employment database (e.g., WRDC, OAWA, AES, LAMP, CNA, Avalon Employment Centre, Independent Living Resource Centre, Association for New Canadians, NunatuKavut Community Council, Nunatsiavut Government, etc.).	*	*	*	*	Benefits	Ongoing
Work with LCP contractors and unions, governments and stakeholders to encourage women and Aboriginal people to apply for Project positions.	*	*			Benefits	Ongoing
Work with stakeholder groups to identify opportunities for persons with disabilities (e.g., Independent Living Resource Centre, Avalon Employment Centre, Disability Policy Office, HRSDC Disabilities, etc.).			*		Benefits	Ongoing
Use OAWA and WRDC databases to identify potential female workers and promote available job opportunities to these women. LCP's Gender Equity and Diversity Coordinator will engage directly with these organizations to identify potential hires in response to contractors' requests for employment.	*				Benefits	Ongoing
Provide links and resource information on muskratfallsjobs.com website referencing organizations supporting underrepresented groups.	*	*	*	*	Communications	2014

LCP's Gender Equity and Diversity Coordinator, supported by contractor resources and a union representative, will work directly with individuals to identify potential caregiving resources.	*				Benefits	Ongoing
LCP's Gender Equity and Diversity Coordinator will maintain and promote a caregiver resource listing that will be made available to LCP workers.	*				Benefits	Ongoing

6.2.3. Workplace Policies and Working Conditions

The development of a respectful worksite culture is an important initiative to help meet the Projects' significant labour supply needs through the positioning of LCP as a highly desirable place to work and by orienting new hires effectively to the key aspects of a respectful workplace culture. Not only will this help create a positive and productive work environment, it will also contribute to labour relations stability on site, the retention of productive employees, and most importantly, the promotion of workplace safety for all.

LCP will develop a comprehensive Respectful Workplace Standard. The initiatives outlined in Table 3 are intended to communicate LCP's Respectful Workplace Standard and also to ensure compliance with the Standard and its mechanisms as established for Project worksites.

As well, all Project facilities will comply with applicable regulatory requirements, including accessibility and gender, as a minimum for LCP's Respectful Workplace Standard.

Table 3: RETENTION AND WORKPLACE POLICY INITIATIVES AND WORKING CONDITIONS

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Make information and materials from stakeholder organizations available to LCP management, contractors and workers, including underrepresented groups.	*	*	*	*	Benefits, Comm	Ongoing
Support the establishment of diversity networks to facilitate community building amongst the underrepresented groups.	*	*		*	Project Team	Ongoing
Category: Compliance						
Develop and deliver information on LCP’s Respectful Workplace Standard to workers, contractors and stakeholders.	*	*	*	*	HR, Benefits, Communications	2013-end of construction
Require contractors to have a Respectful Workplace Standard with a zero tolerance for harassment. These policies are fully supported by the Projects’ unions.	*	*	*	*	HR	2013-end of construction
Enforce compliance with LCP Respectful Workplace Standard.	*	*	*	*	HR	2013-end of construction
Ensure LCP contractors are aware of LCP standards, practices, policies related to the employment of underrepresented groups.	*	*	*	*	Benefits	2013-end of construction
Display LCP’s corporate values and respectful workplace statement at LCP worksites.	*	*	*	*	HR, Communications	2013-end of construction
Ensure all workers participate in Gender Awareness training.	*				Benefits (Training)	Ongoing since 2013
Ensure all workers participate in Respectful Workplace Policy training.	*	*	*	*	Benefits (Training)	Ongoing since 2013
Ensure all workers participate in Aboriginal cultural awareness sessions.		*			Benefits (Training)	Ongoing since 2013
Provide supervisors and shop stewards with additional respectful workplace training to enable them to handle any situations that arise in a safe and appropriate manner.	*	*	*	*	Benefits Team (Training)	Ongoing

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Incorporate diversity considerations into the corporate performance assessment process to ensure that performance is assessed without bias.	*	*	*	*	Nalcor HR	2014
Support onsite cultural events for Aboriginal people, considering ongoing work priorities, safety and security requirements, and site policies.		*			Benefits, IBA Lead, Communications	2013-end of construction
Develop shift schedules that address work-life balance in the development of shift schedules and where possible, provide flexibility in individual working schedules to accommodate family responsibilities and cultural considerations.	*	*	*	*	HR	Ongoing
Reinforce messaging about gender equity and diversity through: tool box talks, Lunch and Learns, supervisory training, shop stewards meetings, worksite posters and stickers.	*	*	*	*	Benefits	Ongoing
Ensure worksites, common areas, parking lots are well lit to support personal safety.	*	*	*	*	Safety	Ongoing
Ensure appropriate security is onsite at all times, including female security staff at the Muskrat Falls site.	*	*	*	*	Safety	Ongoing
Ensure permanent accommodation facilities have units that adhere to accessibility standards as per the NL Buildings Accessibility Act and Regulations.			*		Safety	Ongoing
Ensure Project accommodation sites recognize the needs of women (e.g. worksites will have adequate female washroom facilities as per occupational health and safety regulation).	*				Safety	Ongoing
Require all contractors to provide appropriately-sized tools and safety equipment for employees, such as proper-fitting gloves and personal protective equipment (PPE).	*	*	*	*	Contractors, Safety	Ongoing
Ensure safety standards and emergency procedures recognize the needs of persons with disabilities.			*		Safety	Ongoing
Provide supports to persons with diagnosed disabilities where feasible.			*		HR	Ongoing
Provide information to all workers dealing with violence of any kind.	*				Benefits	Ongoing

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Coordinate on-the-job training opportunities where feasible for members of underrepresented groups.	*	*	*	*	Benefits	As required
Category: Partnerships						
Work with stakeholders to develop a Trades Workplace Cultural Awareness program for visible minorities including safety standards and required certifications.			*		Benefits	Q2/Q3 2014
Support union efforts to develop a mentorship program to assist females and other individuals from underrepresented groups in obtaining the skill, ability and competence to be shop stewards as they (unions) acknowledge their commitment to account for gender equity and diversity considerations when appointing shop stewards so females and other individuals from underrepresented groups with the skill, ability and competence have the opportunities to be appointed as shop stewards.	*	*	*	*	HR, Unions	2014-end of construction

6.2.4. Continuous Improvement and Adaptive Management

Both Nalcor and LCP are committed to the principle of continuous improvement. The safety model also supports accountability and responsibility at both the individual and the management levels.

Through this Program, LCP will monitor on a regular basis its gender equity and diversity programs and introduce responsive policy changes as needed within the continuous improvement framework.

LCP will use various tools to collect the necessary information in a way that supports workers, especially women and members of underrepresented groups, in bringing forward their concerns in a safe and protected manner. This includes, but is not limited to, the following qualitative and quantitative approaches:

- formal internal reviews in both the development and revision stages
- one-on-one discussion with employers, supervisors and management
- formal and informal focus groups with management staff and employees
- climate and/or exit surveys with management staff and employees
- corrective measures will be implemented as required

Recommendations for changes arising from these approaches for feedback will be considered with respect to safety, productivity and cost, and a plan for execution of any necessary corrective measures will be developed.

Earlier efforts in GED plans supporting other natural resource-driven projects have focused on increasing participation through effective recruitment and retention efforts. In addition to its own ongoing initiatives to support increased participation through training and workplace readiness, LCP is committed to developing and ensuring a safety focused work site culture that supports diversity and inclusion as keystones to success in this goal. Nalcor, through LCP and its GED Program, believes its efforts to create a responsive, result-based gender equity and diversity process as a learning opportunity for future resource-based construction projects.

Table 4: CONTINUOUS IMPROVEMENT AND ADAPTIVE MANAGEMENT MEASURES

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Review best practices and incorporate initiatives as necessary to adapt to lessons learned.	*	*	*	*	Benefits	Ongoing
Review existing policies and procedures to enhance language in support of workplace diversity.	*	*	*	*	Benefits	Ongoing
Review LCP’s qualitative and quantitative goals for the Program and implement any needed revisions as part of the adaptive management process.	*	*	*	*	Benefits	Ongoing
Engage with members of the underrepresented groups at work sites on an ongoing basis using diversity and gender equity champions on site to facilitate engagement.	*	*	*	*	Benefits Team	Ongoing
Conduct research using tools such as focus groups, surveys, meetings, and/or interviews of workers to gather feedback in a safe and protected manner on the effectiveness of initiatives and to collect suggestions for adaptive management.	*	*	*	*	Benefits	Annually
Conduct employee surveys/interviews for LCP Project Delivery team on exit from LCP to identify any gender equity and diversity challenges, and endeavour to implement corrective measures as required.	*	*	*	*	HR	2014-end of construction
Report regularly (monthly, quarterly and annually) on the GED Program’s accomplishments and initiatives derived from the employment initiatives and targets.	*	*	*	*	Benefits, Communications	Ongoing since Jan 2013
Category: Compliance						
Carry out an annual audit of GED initiatives to document successes in meeting commitments, to identify areas of concern, and to implement any adjustments to the GED Program as a result.	*	*	*	*	Benefits	2014-end of construction

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Partnerships						
Review best practice initiatives from other regions related to childcare.	*				Benefits	Ongoing

6.3. Employment Targets

The Program sets quantitative goals for Project participation for women and members of underrepresented groups. These goals are based on supply data and current Project estimates. Progress on achievement of these goals will be monitored on a quarterly basis and will be re-evaluated on an annual basis.

6.3.1. Project Participation

Women

- 1,000 women registered in muskratfallsjobs.com, LCP's employment database
- An initial target of 8% of apprentices, reviewed annually and increased for individual trades (up to 25%) where labour supply is available in accordance with the hiring protocol. In construction trades, women currently represent approximately 4% of the workforce.
- 20% of total Project hours worked, 3.9 million hours, 375 full-time equivalents (FTEs) per year, 1,875 person years over the life of the Projects.
- 12% of all trades and labour hours worked, 1.2 million hours, 115 FTEs per year, 577 person years over the life of the Projects.
- 35% of all Project Support hours, 1.3 million hours, 125 FTEs per year, 625 person years over the life of the Projects.
- 30% of all Engineering, Professional and Technical hours worked, 965,000 hours, 93 FTEs per year, 464 person years over the life of the Projects.
- 30% of all Project Management hours worked (110,000 hours, 11 FTEs per year, 55 person years over the life of the Projects).
- 50% of work-term students (including similar roles, such as summer students, co-op program hires, or interns) employed by LCP.

Aboriginal People

- 1,000 Aboriginal people registered in muskratfallsjobs.com, LCP's employment database
- 8% of apprentices. Aboriginal people comprise approximately 3% of the construction industry's workforce nationally.
- 10% of total Project hours worked; estimated at 1.8 million hours, 183 FTEs per year, 915 person years over the life of the Projects.
- 20% of all Project Support hours; estimated at 730,000 hours, 73 FTEs per year, 365 person years over the life of the Projects.
- 30% of work-term students employed by LCP and its contractors in Labrador.

People with Disabilities

- 50 workers on site who have self-identified as a person with a disability.
- 50 accommodative measures put in place for persons with disabilities.
- 25 positions identified for persons with disabilities. These positions will be forwarded to stakeholder groups and qualified individuals will be encouraged to apply.

Visible Minorities

- 30 workers associated with the Projects that have self-identified as a visible minority.

6.4. Business Access Strategy Initiatives

6.4.1. Build Awareness of Project Opportunities

The overarching goal of the business access strategy is to ensure full and fair opportunity for goods and services on a competitive basis for work associated with the Projects to businesses owned by the underrepresented groups, as well as fulfilling the IBA commitments regarding Innu business opportunities.

One of LCP's business access strategies is to build awareness of the breadth of opportunities associated with the Projects (including direct, indirect, and induced opportunities), and LCP's procurement requirements and processes.

The initiatives to achieve this objective are outlined in Table 5.

Table 5: PROJECT/CONTRACT OPPORTUNITY AWARENESS INITIATIVES

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Communicate Project requirements through supplier development workshops.	*	*	*	*	Consultation, Procurement	2011-2014
Communication directed to the underrepresented groups for procurement opportunities.	*	*	*	*	Communications, Consultation	2013 to Project commissioning
Advertisements identifying breadth of opportunities with invitations to the underrepresented group businesses to participate in business opportunity sessions.	*	*	*	*	Communications	2013 to Project commissioning
Invite underrepresented group business owners to supplier workshops/information sessions.	*	*	*	*	Communications, Consultation	2011 to 2014
Provide information to the underrepresented groups on indirect, direct and induced contracting opportunities and encourage business owners to seek out these business opportunities.	*	*	*	*	Consultation, Procurement, Communication	2013 to Project commissioning
Outreach to business community through Business Opportunities Committee.	*	*	*	*	Consultation, Procurement	2013 to Project commissioning
Participation by LCP and LCP contractors in events directed at the underrepresented group business owners.	*	*	*	*	Consultation, Procurement	2013 to Project commissioning
Initiate and/or plan a public event focusing on encouraging female involvement in business opportunities for the Projects	*				Communications, Consultation	2011-2014
Promote/profile business owners associated with the Projects.	*	*	*	*	Communications	2014

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Compliance						
Regular (monthly) reporting of GED Program accomplishments/initiatives related to business opportunities.	*	*	*	*	Benefits, Communications	Ongoing since Jan 2013
LCP and its contractors will provide, upon request, procurement documents in accessible formats.			*		Procurement	As required
Category: Partnerships						
Partnerships with stakeholder groups to deliver supplier information sessions to target business owners, including: Newfoundland and Labrador Organization of Women Entrepreneurs (NLOWE), Innu Nation, HVGB Chamber of Commerce, Board of Trade, etc.	*	*	*	*	Consultation, Communication	Ongoing

6.4.2. Ensure Understanding of the Projects' Procurement Requirements

LCP has established processes to address Project requirements and to qualify contractors and suppliers.

LCP is committed to ensuring there is an understanding by the underrepresented groups of the processes used by LCP for procurement.

LCP sees opportunities for future business development benefits by

- Identifying strategic areas within the broader supply/service chain to focus on supplier diversity.
- Ensuring businesses led by women and other underrepresented groups are aware of these opportunities.
- Identifying best practices and areas that the province should focus on to increase supplier diversity in the resource sector.

The IBA requires that LCP offer Innu businesses first bidding opportunity for designated LCP contracts. LCP also considers Innu content in the evaluation of all LCP contracts.

LCP has developed specific initiatives to achieve this business access strategy objective, and these are outlined in Table 6.

LCP primary contractors are encouraged to adopt these initiatives.

Table 6: PROCUREMENT PROCESSES AND REQUIREMENTS

Initiative	Groups				Responsible	Schedule
	W	A	PD	VM		
Category: Communications and Outreach						
Encourage businesses/joint ventures owned by the underrepresented groups to register in the LCP vendor database.	*	*			Benefits, Procurement, Communications	Ongoing
Direct contractors to organizations representing women-owned businesses, such as NLOWE.	*				Benefits, Procurement	Ongoing to year end 2014
Provide information regarding businesses owned by the underrepresented groups to LCP team who make purchasing decisions.	*	*	*	*	Benefits, Procurement	Ongoing to year end 2014
Enhance capacity and expertise by piloting and refining education/awareness sessions including specific content and supporting materials regarding requirements of procurement process in association with business/municipal partners such as NLOWE	*	*	*	*	Benefits, Procurement	Ongoing to year end 2014
Category: Compliance						
Encourage businesses/joint ventures owned by the underrepresented groups to self-identify during the Expression of Interest (EOI) and Requests for Proposals (RFP) processes.	*	*			Procurement, Communication, Consultation	Ongoing to year end 2014
Provide full and fair opportunity through the procurement processes of LCP and its contractors to businesses/joint ventures owned by the underrepresented groups to compete for contracts associated with the construction of the Projects.	*	*	*	*	Procurement, Contractors	Ongoing to year end 2014
Give consideration in the procurement evaluation process to businesses/joint ventures that are owned by the underrepresented groups.	*	*			Procurement	Ongoing to year end 2014
Provide feedback, when requested, on LCP's procurement process.	*	*	*	*	Procurement	Ongoing as required

6.4.3. Business Access Targets

The following business access targets have been established for the Projects:

Women-Owned Businesses/Joint Ventures

- 100 women attend Project supplier information sessions.
- \$10 million in expenditure (contracts, subcontracts and purchase orders) to women-owned businesses and joint ventures

Aboriginal-Owned Businesses/Joint Ventures

- 100 Aboriginal people attend LCP supplier information sessions.
- 100 Aboriginal businesses/joint ventures registered in LCP's vendor database
- \$140 million in expenditure (contracts, subcontracts and purchase orders) to Aboriginal businesses and joint ventures.

6.5. Innu Initiatives

The Labrador Innu claim Aboriginal rights and title to a significant portion of Labrador, including the Project areas. The Innu Nation land claim was accepted by the federal government for negotiation in 1978 and negotiations are currently ongoing between the federal government, provincial government and Innu Nation.

In recognition of this claim, Nalcor has entered into an Impacts and Benefits Agreement (IBA) with Innu Nation to address Innu interests in the Project areas.

Nalcor has made IBA commitments in relation to employment and training, workplace policies, business opportunities and environmental management, including specific initiatives regarding women. In addition to its IBA commitments, Nalcor has undertaken special initiatives to enhance employment and training opportunities for Labrador Innu.

Table 7 outlines the IBA and other initiatives in support of Labrador Innu participation in employment and business opportunities associated with the Projects.

Table 7: IBA COMMITMENT INITIATIVES

Initiative	Labrador Innu	Responsible	Schedule
Category: Employment and Training			
Hire an Innu Employment and Training Coordinator to support priority hiring for qualified Labrador Innu and associated training and employment supports.	*	IBA Lead	Completed
Assist Innu Nation to develop an Innu training plan and to access third-party funding for Innu interested in working on the Projects.	*	IBA Lead	Completed (LATP)
Provide on-the-job training opportunities through Nalcor and in cooperation with Project contractors.	*	IBA Lead	Ongoing through end of construction
Provide, where possible, the services of Nalcor’s training coordinators to deliver safety certification courses to enhance employment qualifications of Innu interested in working on the Projects, including delivery of training in Sheshatshiu and Natuashish.	*	IBA Lead	Ongoing through Q1 2015 (LATP)
Hold employment information sessions and providing assistance with the job application process, including offering these services in Sheshatshiu and Natuashish.	*	IBA Lead	Ongoing through Q1 2015
Award scholarships to Innu post-secondary students and participating in career fairs and related activities in Innu schools and communities.	*	IBA Lead	Ongoing through IBA term
Provide summer employment and work terms through Nalcor and in cooperation with Project contractors.	*	IBA Lead	Ongoing through end of construction
Category: Workplace Policies and Conditions			
Include IBA commitments in Projects’ collective agreement negotiations.	*		Completed

Initiative	Labrador Innu	Responsible	Schedule
Consult with Innu Nation on workplace policies, including: alcohol and drug use, harvesting in the Project areas, lodging and transportation of Innu employees, and translation of safety signage.	*	IBA Lead	As required
Establish workplace policies requiring mandatory Innu cross-cultural training for all employees, and prohibition of discrimination and harassment of Innu.	*	IBA Lead	Completed
Hire an on-site Innu Liaison Coordinator to assist Innu who have questions or are experiencing problems in the workplace; including provision of translation services to Innu employees who are involved in disciplinary processes or respectful workplace processes.	*	IBA Lead	Completed
Appoint a GED Coordinator to manage the LCP GED Program.	*	IBA Lead	Q3 2014
Establish a GED Working Group to oversee implementation and led by the Vice President for LCP and the Vice President Corporate Relations.	*	IBA Lead	Q3 2014
Provide workplace orientation programs to assist Innu employees to transition to the LCP workplace.	*	IBA Lead	Ongoing through end of construction
Provide Employee Assistance Program (EAP)/counselling services for Innu employees.	*	IBA Lead	Ongoing through end of construction
Provide resources for Innu social and cultural activities in the workplace.	*	IBA Lead	Ongoing through end of construction
Establish an Innu Employee Advisory Committee, including representation of Innu LCP site employees.	*	IBA Lead	Ongoing through end of construction
Work with Innu Nation to identify workplace issues which may present barriers to employment and retention of Innu women, and identifying potential corrective measures.	*	IBA Lead	Ongoing through end of construction

Initiative	Labrador Innu	Responsible	Schedule
Encourage and support cultural leave and flexibility in work schedules and rotations to enable Innu employees to participate in traditional activities.	*	IBA Lead	Ongoing through end of construction
Provide country foods in the cafeteria, when available.	*	IBA Lead	Ongoing through end of construction
Category: Business Opportunities			
Provide first bidding opportunity for qualified Innu businesses for IBA-designated contracts.	*	IBA Lead	Ongoing through year end 2014
Ensure Innu content is a consideration in bid evaluations for all awarded LCP contracts.	*	IBA Lead	Ongoing through year end 2014
Establish Innu business participation target of \$134 million set for Muskrat Falls.	*	IBA Lead	Completed
Provide the Innu Business Development Centre and individual Innu businesses with information through supplier development sessions, meetings and regular communications, regarding potential contracting opportunities for Innu businesses.	*	IBA Lead	Ongoing through year end 2014
Establish a joint Nalcor-Innu Nation Innu Business Development Advisory Committee to monitor progress towards the Innu business participation target and to recommend measures to promote Innu businesses.	*	IBA Lead	Completed

6.6. Program Implementation

LCP has a leadership responsibility for advancing gender equity and diversity throughout the Projects and will achieve this by:

- Providing leadership in developing and implementing this program as well as advocating and supporting gender equity and diversity initiatives
- Reporting on gender equity and diversity performance to the Government of Newfoundland and Labrador.
- Working with stakeholders and community groups.
- Holding annual gender equity and diversity consultation with governments, stakeholders and other community groups with the intent of continuous improvement through ongoing dialogue.

The success of this Program relies on the experience, support and networks of existing government initiatives and stakeholder organizations. These entities bring a wealth of expertise, motivation and programming that will set a new standard for gender equity and diversity in this province. This Program looks to stakeholder organizations and government entities to contribute the following:

- Support of the Program through existing initiatives and networks.
- Offer new ideas to capitalize on Project opportunities.
- Work with LCP, its contractors and unions to optimize opportunities by offering solution-based input.

6.7. Role of Contractors

Contractors and sub-contractors will undertake the majority of the construction work. The support, compliance and implementation of this Program is a contractual obligation for all primary contractors associated with the Projects. The Benefits Strategy states:

LCP will require that each primary contractor to the Projects provide LCP with a plan for compliance with the WEP, and will require that contracts related to the execution of the Projects include an acknowledgement from the successful bidder that they are aware of the existence and importance of the WEP.

In implementing this Program, the Projects' primary contractors, selected by LCP on the basis of the amount and type of work they are undertaking, will be required to establish various organizational requirements, including:

- Establishing gender equity and diversity goals
- Supporting the Program's quantitative goals
- Submitting detailed human resource policies
- Participating in stakeholder consultation sessions

6.8. Role of Unions

LCP will work closely with unions to support implementation of the GED Program. This means LCP and unions will:

- Ensure that collective agreement obligations in support of the gender equity and diversity plan are met
- Identify bringing forward to the Operator ways to increase diversity on the Project
- Ensure consideration of this Program in the referral of apprentices, workers and supervisors
- Support the Program's quantitative goals
- Work with LCP contractors and stakeholders to create an inclusive workplace
- Ensure unions are invited to participate in stakeholder consultation sessions.

7. LCP WORKPLACE POLICY

Workplace principles for the Projects are incorporated in the LCP Site Handbook, which is provided to every LCP employee following orientation. Each employee is required to sign their handbook, signifying acceptance of the policies, principles and values contained therein.

The orientation session is mandatory for all LCP workers and emphasized and contains components dedicated to gender equity, diversity, respectful workplace practices, and company policies governing employee behaviours and expectations contributing to a positive and affirming workplace culture.⁷

⁷ A copy of the LCP site handbook is included as Appendix D

8. MONITORING & REPORTING

LCP has established a Benefits Monitoring and Reporting System (BMRS) for the Projects.

Progress on the implementation of initiatives outlined in this plan will be reported on a monthly basis in the Monthly Project Report.

All contractors are required to submit benefits data on a monthly basis, which includes employment and expenditure data such as:

- Occupational Category
- Gender
- Aboriginal Affiliation
- Persons with a disability
- Visible Minority
- Expenditures made to businesses/joint ventures owned by women and members of underrepresented groups

Project reports, including gender equity and diversity information (activities and statistics) are submitted to the Government of Newfoundland and Labrador, consistent with sections 5.0 and 6.0 of the Benefits Strategy. These reports are published on the Projects' website (musktratfalls.nalcoreenergy.com) on a monthly basis and are available to the public. LCP, on request, will report additionally best practices which emerge from this Program to increase gender equity and diversity in the resource sector.

9. CONCLUSION

As a Crown corporation, Nalcor is uniquely positioned to advance innovative gender equity and diversity practices in the natural resources sector. Both Nalcor and LCP are committed to gender equity and diversity as a fundamental keystone of creating a respectful workplace dedicated to safety, quality, productivity and inclusiveness.

LCP developed its Gender Equity and Diversity Program using research, best practices and industry expertise in Nalcor and beyond to increase the level of participation by target groups in the Projects for both employment and business opportunities and to ensure enhanced access to the benefits derived from this involvement.

The Program offers a blueprint for advancing the participation of women, Aboriginal people, people with disabilities and visible minorities in LCP. The initiatives described in this document are designed to advance employment and business participation, while also incorporating and considering the unique features of the energy projects being developed. LCP has also established targets and monitoring processes to manage progress adaptively against the targets of traditionally underrepresented groups.

Appendix A
Gender Equity and Diversity Clauses from Collective Agreements

The collective agreements are as follows:

1. The Collective Agreement between Muskrat Falls Employers' Association Inc. and Resource Development Trades Council of Newfoundland and Labrador for the Construction of the Lower Churchill Hydroelectric Generation Project at Muskrat Falls on the Lower Churchill River Newfoundland and Labrador (MFEA and RDC).
2. The Lower Churchill Project Transmission Construction Collective Agreement between Lower Churchill Transmission Construction Employers' Association Inc. and International Brotherhood of Electrical Workers and IBEW Local Union 1620 (LCTCEA and IBEW 1620).
3. The Lower Churchill Reservoir Clearing Collective Agreement between Lower Churchill Reservoir Clearing Employers' Association Inc. and Labourers International Union of North America and Construction and General Labourers' Union, Rock and Tunnel Workers Local 1208 (LCRCEA and Local 1208").

The following specific clauses relate to gender equity and diversity in each of the collective agreements.

1. MFEA and RDC

Article 7 – Hiring Provisions

7.03 In order to meet the obligations applicable to the hiring and retention of qualified Labrador Innu and obligations contained within the Benefits Strategy, the Parties agree that all Project partners, including the Association, its Contractor members, the Council of Unions and its Union members will work proactively and progressively to advance the participation and integration in the areas of employment, training and apprenticeship for women and members of underrepresented groups as per gender Equity and diversity objectives.

7.08 a) The Parties agree that highly qualified supervision is fundamental to the success of the Project, therefore the following will apply:

- i) Foreperson and general foreperson will be selected or name hired after having received pre-employment multi-faceted training, including but not limited to safety, cultural sensitivity, respectful workplace, labour relations dispute resolution pursuant to the Agreement and productivity;
- ii) The selection of forepersons and general forepersons must be in alignment with the Benefits Strategy and Gender Equity and Diversity objectives established in consultation with the Province.

b) The Parties agree that it is fundamental to the success of the Project to have highly qualified trained employees, and accordingly agree to the following:

- i) Workers will be selected or name hired by the Contractor and/or referred by the Union from a group of workers that have received pre-employment multi-faceted orientation and training, including Site and collective agreement orientation, safety, environment, cultural and gender sensitivity, respectful workplace and productivity, as is set out above in 7.08 a), so that such employees have the skills and tools to succeed;

Article 12 Diversity and Gender Equity on the Project

12.01 The Association, its Contractor members, the Council of Unions and its Union members will promote and support Gender Equity Programs and Diversity Programs established in accordance with the Benefits Strategy. The Parties to this Agreement recognize and support the principles of diversity and employment and gender equity in the workplace and will work cooperatively to create a respectful and inclusive work culture.

12.02 The Association, its Contractor members, the Council of Unions and its Union members will support the Lower Churchill Project Gender Equity and Diversity Program and the participation goals for women and underrepresented groups established in consultation with the Province.

Article 16 Shop Stewards

16.01 Stewards shall be appointed by the Union Business Manager or his/her representative. Skill, ability and competency as well as Gender Equity and Diversity shall be considerations in the appointment of Stewards.

Article 34 Apprenticeship and Training

34.01 The Association, the Contractors, the Council of Unions and the Unions agree, in alignment with the Benefits Strategy and obligations to the Labrador Innu, to create training, development and apprenticeship opportunities.

34.02 The Association, the Contractors, the Council of Unions and the Unions agree to Project conditions and law, to maximize placement and utilization of apprentices as follows:

a) Not less than one (1) apprentice for every three (3) journeypersons; and

b) Not more than two (2) apprentices for each journeyperson.

34.03 Gender Equity and Diversity shall be a consideration when hiring or referring Apprentices to the Project as part of the Parties' cooperative effort to achieve and sustain participation rates for women and underrepresented groups established in consultation with the Province.

34.04 The employment of apprentices (within regulatory requirements and limitations) will be promoted throughout the duration of the Project and will provide for a spectrum of apprentices from the first year through the fourth year as appropriate to their respective trade(s). The Parties will facilitate this through the effective utilization of the hiring provisions contained in Article 7 of this Agreement.

The MFEA and RDC also signed a Memorandum of Understanding on June 13, 2013 agreeing to the following key points:

1. To support and promote initiatives and plans for employment diversity.
2. To provide full access to employment opportunities for and employment of qualified women and qualified members of underrepresented groups (Aboriginal people, persons with disabilities and members of visible minorities).
3. To implement proactive programs and practices that contribute to the creation of an inclusive work environment consistent with the policies established for the Project and commitments in the Gender Equity and Diversity Program.
4. To achieve diversity objectives, the Parties have agreed to the name hiring provisions set out in Article 7.07(c) & (d).

5. The collective agreement will not frustrate access to employment for underrepresented groups.

2. LCTCEA and IBEW 1620

Article 7 – Hiring Provisions

7.03 In order to meet the obligations applicable to the hiring and retention of qualified Labrador Innu and obligations contained within the Benefits Strategy, the Parties agree that all Project partners, including Contractors, the Union and the Association will work proactively and progressively to advance the participation and integration in the areas of employment, training and apprenticeship women and members of underrepresented groups as per gender equity and diversity objectives.

- 7.09 a) The Parties agree that highly qualified supervision is fundamental to the success of the Project, therefore the following will apply:
- i. Forepersons will be selected or name hired after having received pre-employment multi-faceted training including, but not limited to, site and collective agreement orientation and training, safety, environment, IBEW Code of Excellence, cultural and gender sensitivity, mentoring and coaching, work scheduling and budgeting, respectful workplace, labour relations dispute resolution pursuant to the agreement, communication skills, productivity, leadership, team building, management and maintaining schedule in advance of coming to work so they have the skills and tools to succeed.
 - v. The selection of foremen must be in alignment with the Benefits Strategy and Gender Equity and Diversity objectives established in consultation with the Province.
- b) The Parties agree that it is fundamental to the success of the Project to have highly trained employees, and accordingly agree to the following:
- i. Workers will be selected or name hired by the Contractor and/or referred by the Union from a group of workers that have received pre-employment multi-faceted orientation and training, including, site and collective agreement orientation, safety, environment, IBEW Code of Excellence, cultural and gender sensitivity, respectful workplace, dispute resolution pursuant to the Agreement and productivity, so that such employees have the skills and tools to succeed.

Article 12 – Diversity and Gender Equity on the Project

12.01 The Association, its Contractor members and the Union will promote and support Gender Equity Programs and Diversity Programs established in accordance with the Benefits Strategy and programs established in order to support the training, hiring and retention of Labrador Innu. The parties to this Agreement recognize and support the

principles of diversity in employment and gender equity in the workplace, and will work cooperatively to create a respectful and inclusive work culture.

- 12.02 The Association, its Contractor members and the Union will support the Lower Churchill Project Gender Equity and Diversity Program and the participation goals for women and underrepresented groups established in consultation with the Province.

Article 16 – Shop Stewards

- 16.01 Stewards shall be appointed by the Union Business Manager or his/her representative. Gender Equity and Diversity shall be considerations in the appointment of stewards. When a scheduled second and/or third shift occurs, stewards for such shift(s) may be appointed. Such appointments shall be confirmed in writing to the Contractor and the Association. Stewards assigned to represent a particular shift will not retain their status if that shift is cancelled.

Article 24 – Accommodations

- 24.07 Accommodations will take into account the requirements of a diverse workforce.

Article 34 – Apprenticeship and Training

- 34.01 The Association, the Contractors and the Union, in alignment with the Benefits Strategy and obligations to the Labrador Innu, agree to work cooperatively to create training, development and apprenticeship opportunities as part of their joint responsibility to maintain a supply of skilled tradespersons for the Project.
- 34.02 The Parties agree to cooperate to the fullest extent with any government instituted Apprenticeship Training Plan including layoff for yearly in-school training where requested by the employee.
- 34.03 The Association, the Contractors and the Union agree, to the extent permitted by Project conditions and law, to maximize placement and utilization of apprentices.
- 34.04 Gender equity and diversity shall be a consideration when hiring or referrals of apprentices to the Project as part of the Parties cooperative efforts to achieve, sustain and hopefully surpass participation goals for women and underrepresented groups established in consultation with the Province.

The LCTCEA and IBEW also signed a Memorandum of Understanding on May 17, 2013 agreeing to the following key points:

1. To support and promote initiatives and plans for employment diversity.
2. To provide full access to employment opportunities for and employment of qualified women and qualified members of underrepresented groups (Aboriginal people, persons with disabilities and members of visible minorities).

3. To implement proactive programs and practices that contribute to the creation of an inclusive work environment consistent with the policies established for the Project and commitments in the Gender Equity and Diversity Program.
4. To achieve diversity objectives, the Parties have agreed to the same hiring provisions set out in Article 7.08(b) & (c).
5. The Collective Agreement will not frustrate access to employment for underrepresented groups.

3. LCRCEA and Labourers 1208

Article 7 – Hiring Provisions

- 7.03 In order to meet the obligations applicable to the hiring and retention of qualified Labrador Innu and obligations contained within the Benefits Strategy, the Parties agree that all Project partners, including Contractors, the Union and the Association will work proactively and progressively to advance the participation and integration in the areas of employment, training and apprenticeship for women and members of underrepresented groups as per gender equity and diversity objectives.
- 7.06 a) The Parties agree that it is fundamental to the success of the Project to have highly trained employees, and accordingly agree to the following:
- i. Workers will receive, prior to employment, pre-employment multifaceted orientation and training, including, site and collective agreement orientation, safety, environment, cultural and gender sensitivity, and respectful workplace, so that such employees have the skills and tools to succeed.

Article 12 – Diversity and Gender Equity on the Project

- 12.01 The Association, its Contractor members and the Union will promote and support Gender Equity Programs and Diversity Programs established in accordance with the Benefits Strategy and programs established in order to support the training, hiring and retention of Labrador Innu. The parties to this Agreement recognize and support the principles of diversity in employment and gender equity in the workplace, and will work cooperatively to create a respectful and inclusive work culture.
- 12.02 The Association, its Contractor members and the Union will support the Lower Churchill Project Gender Equity and Diversity Program and the participation goals for women and underrepresented groups established in consultation with the Province.

Article 16 – Shop Stewards

- 16.01 Stewards shall be appointed by the Union Business Manager or his/her representative. Gender Equity and Diversity shall be considerations in the appointment of stewards.

Article 22 – Accommodations

22.05 Accommodations will take into account the requirements of a diverse workforce.

The LCRCEA and Labourers also signed a Memorandum of Understanding on May 21, 2013 agreeing to the following key points:

1. To support and promote initiatives and plans for employment diversity.
2. To provide full access to employment opportunities for and employment of qualified women and qualified members of underrepresented groups (Aboriginal people, persons with disabilities and members of visible minorities).
3. To implement proactive programs and practices that contribute to the creation of an inclusive work environment consistent with the policies established for the Project and commitments in the Gender Equity and Diversity Program.
4. To achieve diversity objectives, the Parties have agreed to the Contractor hiring provisions set out in Article 7.05(a) and union referral provisions contained in Article 7.05(b).
5. The Collective Agreement will not frustrate access to employment for underrepresented groups.

Appendix B

Gender Equity & Diversity Program 2012 Consultation Report

A. INTRODUCTION

The Government of Newfoundland and Labrador and Nalcor Energy are committed to the principles outlined in the province's Energy Plan with respect to construction of the Lower Churchill Hydroelectric Generation Project and the Labrador-Island Transmission Link.

The Department of Natural Resources has outlined gender equity and diversity requirements for industrial developments, including the Lower Churchill Project (LCP). These requirements, as well as the LCP's Benefits Strategy negotiated with the Province of Newfoundland and Labrador, provide the framework for Nalcor's Gender Equity and Diversity Program for construction of the Lower Churchill Project.

In developing the LCP Gender Equity and Diversity Program Nalcor invited the following organizations to provide input and feedback on the proposed program.

NGO's and Government	Sheshatshiu Innu First Nation Mushuau Innu First Nation NunatuKavut Community Council Nunatsiavut Government Violence Prevention organizations Women's Safe Houses/Shelters Women's policy office Women in Resource Development Corporation (WRDC) Women in Apprenticiable Trades Vale Diversity Committee Women in Science and Engineering Women Interested in Successful Employment Newfoundland and Labrador Organization of Women Entrepreneurs (NLOWE) Ananaukatiget Tuningit Inuit Regional Women's Group Women's Centre's (St. John's and Labrador) Multicultural Women's Association Department of Natural Resources Department of Education - Apprenticeship Registration Office to Advance Women Apprentices NSERC/Petro-Canada Chair for Women in Science and Engineering, Atlantic Region
Trade Unions/Labour	Canadian Building Trades Council (CBTC) Resource Development Council (RDC) All member Unions

Training Organizations	College of North Atlantic (CNA) Private Training Institutions Memorial Gardiner Institute Labrador Institute Union Training Institutions
Training Partnerships and Funding Organizations	Labrador Aboriginal Training Partnership (LATP) Aboriginal Skills Enhancement Training Strategy (ASETS) agreement-holders Atlantic Canada Opportunities Agency (ACOA) Human Resources and Development Canada (HRSDC) Human Resources Labour and Employment (HRLE) Indian and Northern Affairs Canada (INAC) Health Canada (HC)
Other Industry	Vale Inco Hebron Iron Ore Company of Canada Wabush Mines New Millenium Palladin (Aurora Energy)

The consultations took place in two stages:

One-on-one consultations from March to May 2012

Focus group consultations on May 15, 2012, in Happy Valley-Goose Bay, and on May 16, 2012, in St. John's.

LCP is considering the information exchange with these groups in finalizing the Gender Equity and Diversity (GED) Program (Program), and in developing respectful workplace and labour acquisition standards. The feedback will also be considered in developing specific and measurable annual targets.

B. SUMMARY OF CONSULTATION FEEDBACK

Throughout the one-on-one and focus group consultations, organizations recognized LCP for taking an early and proactive approach to developing a gender equity and diversity program. Most agreed that a good framework is in place and the focus should now be on setting targets and pursuing actions that will give meaning to the policy statements. The comments and recommendations heard during consultations can be broadly summarized into six major themes:

Detailed targets: There must be clear and direct targets set to implement the Program. While the policy framework provides all the right language, the program can only be successful if it is specific and measurable, and if it sets minimum targets that must be met by all.

Monitoring and enforcement: Positions must be created and given the authority and information needed to coordinate, monitor and enforce compliance with LCP's gender equity and diversity requirements, from the primary contractor through to all levels of sub-contractors.

Training: LCP must coordinate the delivery of many levels of training, including essential workplace skills such as worksite readiness, cultural awareness, and gender equity and diversity awareness. Training will be the key to success for the Program.

Comprehensive communication loop: Communication on the Program must be thorough and reach all levels, from the main contractor through to all sub-contractors. Supervisors and managers are a critical link in the communications loop since they will be instrumental in implementing the program.

Small business supports: To ensure access to LCP work for businesses owned by underrepresented groups, early, accessible and clearly-written information on how to participate is important.

Continued consultation and cooperation: Organizations with a vested interest in gender equity and diversity can share information and advice that will support the ongoing implementation of LCP's Program. It is important that LCP create processes to facilitate an ongoing relationship.

Stakeholder support

During the consultations, groups expressed an interest in supporting LCP's GED policies and targets for the Project. They offered to stay actively involved in consultations, to share expertise in specific areas related to the Program, and to use their distribution networks to reach members with messages and information about LCP's gender equity and diversity initiatives.

C. SUMMARY OF ONE-ON-ONE CONSULTATIONS

During March, April and May, LCP met one-on-one with several organizations representing women and underrepresented groups to discuss a draft concept version of LCP's Program.

The goal was to stimulate discussion and ask representatives to advise and make suggestions on any major gaps or additional measures needed to improve the Program. One-on-one meetings were held with:

Innu Nation

Sheshatshiu Innu First Nation (SIFN)

Mushuau Innu First Nation (MIFN) - Natuashish

Nunatsiavut Government

NunatuKavut Community Council

Labrador Aboriginal Training Partnership

Miawpukek First Nation – Conne River

Qalipu Mi'kmaq First Nation

Newfoundland and Labrador Organization of Women Entrepreneurs (NLOWE)

Women in Resource Development Corporation (WRDC)

Office to Advance Women Apprentices (OAWA)

Coalition of Persons with Disabilities

Canadian Hard of Hearing Association

Partners for Workplace Inclusion Program (PWIP)

Women in Science and Engineering

Association of New Canadians

Provincial Advisory Council on Status of Women

Mokami Status of Women Council

Libra House

Women's Policy Office

Office of Immigration and Multiculturalism

While there was positive response to the Program, groups offered the following comments and insights:

In addition to communicating goals and targets to contractors and labour organizations, these goals and targets should also be shared with women's organizations.

With regard to mandatory training in gender sensitivity, diversity, equity, respectful workplace and inclusion, several groups strongly recommend this training occur **prior to arrival at site**.

For complaints on site, a Shop Steward/HR person should be on site as a key person to ensure the complaints process is fair and equitable.

An LCP/EPCM Diversity Coordinator is also needed on site.

Targets and goals for women's employment must be tied to specific training initiatives – this can help with the ratios.

Can data from the LCP database regarding women employed/ applied/etc be made available to other groups?

Nalcor should consider offering a "refresher" workplace training program, specifically for HEOs, but for others as well. In some cases, women are a few years removed from the workforce and/or training and need to refresh their skills.

The Project should employ female supervisors/shop stewards. In addition, there should be more than one woman per work crew/team.

Groups should be sent notification when job advertisements are ready to hit the various media - groups can distribute to their respective networks.

Nalcor should consider establishing a committee of owner/contractors/union to meet regularly to discuss GED issues.

More information is needed regarding contract award and expenditures to women-owned businesses.

Regarding self-identification of disabilities, it was suggested that upon hiring, people should be asked if they need any special workplace accommodations. This might lead to a better understanding of any disabilities and allow the necessary workplace modifications to occur.

For persons with disabilities, flexible work schedules would be welcome, to allow individuals to deal with issues as they arise. There is no control over the timing of when a disability issue arises.

There should be a special focus on youth in all underrepresented groups.

Setting goals and targets are important, but creating a culture is more important. The results will then come.

Community groups should participate in identifying joint projects; they can help report on progress on various issues.

Parental leave/flexible work schedules are important and need to be geared towards men as well. It allows women the flexibility to work in construction.

Cultural awareness training needs to be delivered similar to safety training, with the same importance and scope.

Innu from both Natuashish and Sheshatshiu highlighted several issues, most of which are addressed via provisions contained in the Impact and Benefits Agreement (IBA). Issues needing special consideration include addictions and communications/language.

Innu liaison positions are needed on-site and must be visible in order to be effective.

Local Labrador contractors who successfully obtain work need to be more progressive in hiring women and Aboriginal people.

It is important to explain to new workers the process of when there may be a layoff and the sequence of events that follows.

D. SUMMARY OF FOCUS GROUP CONSULTATIONS

In May, LCP held two focus groups to gather input on the proposed Program. Each session was three and a half hours long and was led by an external facilitator. Both sessions inquired into three areas:

What is your reaction to the proposed GED Program? (*Sub-questions: How will it impact your group and members? Do you perceive gaps that need to be addressed before the program is finalized?*)

What are your recommendations for implementing the Program?

How can your organization support implementing the Program?

Happy Valley – Goose Bay: May 15, 2012

The following 14 participants attended the session held at Hotel North:

Name	Organization
Cyril Peach	Coalition of Persons with Disabilities
Theresa Hollett	Nunatsiavut Government
Francine Couture	Nunatsiavut Government
Tim McNeill	Nunatsiavut Government
Michelle Kinney	Nunatsiavut Government

Betty Morris	NunatuKavut Community Council
Jennifer Hefler-Elson	Labrador Friendship Centre
Karen Natrass	Labrador Aboriginal Training Partnership
Keith Jacques	Labrador Aboriginal Training Partnership
Jennifer Taylor	Aboriginal Affairs and Northern development Canada
David Massie	Canadian Hard of Hearing Association
Theresa Gregorie	Sheshatshiu Innu First Nation
Amanda Hill	Sheshatshiu Innu First Nation
Shirley Penashue	Sheshatshiu Innu First Nation

Reaction to the proposed Gender Equity and Diversity Program:

The Program says all the right things and uses the right language, but LCP needs to move beyond words and make commitments that are specific, relevant and easy to understand for everyone involved. It’s important to use plain language and provide practical examples.

The labour supply is very short. This will be a challenging Project.

The Program will need buy-in at all levels. Monitoring and accountability are critical.

How will commitments in the IBA be reflected in the GDE policies?

LCP needs to consider the rating that will be used in the bid process. There needs to be a strong requirement for reporting and acting on GED policies and practices. It can’t be an option to skip these practices and get away with it.

Monitoring and enforcement must be diligent. The further things get from LCP (out to contractors and sub-contractors), the harder it will be to monitor adherence to policies.

The language used in contract documents is critical. It must be specific and clear.

A full communication loop, bringing together all stakeholders, must be honoured.

Supervisor engagement is critical on all areas, including cultural sensitivity. If supervisors are not aligned with the policies, the program will not be effective.

Continued consultation is needed.

We must learn from the experience of other major projects, particularly Voisey’s Bay. Get the Program right before construction begins; otherwise the program will continually play catch-up to fix mistakes. The best method of enforcement is through financial penalties. Communication has to be diligently managed from Project owner to contractor to sub-contractor (top to bottom approach). Without this communication, policies and procedures are lost. Provide a safe and private accommodation for women, right from the beginning of the Project. The full loop of accountability and communication is essential.

Recommendations for implementing the program:

Minimum targets: Set and enforce minimum targets on gender equity and diversity. Provide documentation to all contractors. Require contractors and sub-contractors to keep a paper trail of applications received. This will be proof of compliance with hiring protocols and minimum targets.

Contractor communication: Communicate gender equity and diversity to all contractors and sub-contractors, creating a full communication loop. Include hiring managers, unions, site supervisors, shift managers, etc.

Zero tolerance: Ensure policies are enforced at a practical level and cover all aspects of harassment: intimidation, sexual harassment, cultural/racial/gender harassment, bullying, etc. Zero tolerance will lead to a respectful workplace.

Tendering packages: Include information on workforce availability and contacts of organizations that can support meeting GED goals. This can be summarized as a one-pager for the tender package. Include a hiring checklist “have you done...?”

Monitors: Establish independent monitors on Project worksites. They must have open access to information. This may work best with a monitoring team versus an individual monitor.

Training: Deliver training in communities wherever possible. Offer basic (high school equivalency) and workplace readiness workshops, such as worksite orientation, social impacts preparation, etc. Courses such as these will help avoid culture shock for people starting new jobs on the Project and for families left at home. LCP also needs to support apprenticeship training. Introduce a professional development officer position to monitor and support training.

Family supports: Consider childcare needs more broadly (on site and in communities). Consider offering accommodations onsite for married couples.

Accommodations: Specific groups need to be considered and accommodated – women, disabled, pregnant women, etc.

Small business: Large contracts need to be broken down into manageable sizes for smaller businesses, enabling them to bid. Businesses need early information on what will be required so they have time to get ready.

Consultation: Stay connected with stakeholders. Implement a more formalized process, such as working groups on specific issues, to work together to ensure the best GED program possible. Prior to finalizing the GED policy, share the draft with stakeholders. Reach out to groups not yet involved in consultations.

Cultural and language considerations: Ensure the GED program allows flexibility for cultural practices and celebrations. Ensure clear, language-appropriate signage on worksites.

Hiring preferences: Ensure that those who meet multiple criteria receive a higher ranking in the hiring process.

How stakeholder organizations can help implement the program:

We can work with LCP on sensitivity programs and orientations. We can provide, for example, cultural content.

We can increase awareness of all initiatives among our members, using our own distribution networks.

We can work with our members to educate them on the fundamental aspects of gender equity and diversity; we can help them understand what’s acceptable and what’s not. We can communicate the concept of equality.

As stakeholders we can provide content to include in tendering package.

We can help disburse job ads and educate members on GED policies and requirements; this will help hold contractors accountable to the policies.

Our organizations can create parallel positions to work alongside Nalcor’s GED monitor to ensure optimal monitoring and reporting.

We can help LCP find the right training partners.

We can take part in an Advisory Group to help on specific areas such as apprenticeship training.

St. John’s: May 16, 2012

The following 18 participants attended the session in St. John’s:

Name	Organization
Kristy Hoddinott	NLOWE
Karen Walsh	Office to Advance Women Apprentices
Krista Hickey	Office to Advance Women Apprentices
Gloria Montano	Women in Science and Engineering
Linda Ross	Provincial Advisory Council of the Status of Women
Jessica Gallant	Provincial Advisory Council of the Status of Women
Robin Grant (and co-worker)	Association of New Canadians
Nellie Burke	Office of Immigration and Multiculturalism
Keith Goulding	Qalipu Mi’kmaq First Nation
Peter Dawe	Qalipu Mi’kmaq First Nation
Tracey House	Miawpukek First Nation
Sheila Ryan	St. John’s Status of Women’s Council
Tanya Noseworthy	Government of Newfoundland and Labrador, Department of Natural Resources
Lori LeDrew	Partners for Workplace Inclusion
Michelle Clarke	Partners for Workplace Inclusion
Nicole Kielely	Women in Resource Development
Juanita Cutler	Women in Resource Development
Nicole LaBossiere	Women in Resource Development

Reaction to the proposed Gender Equity and Diversity Program:

What we’re talking about is culture change in a short timeframe. What’s the goal? To complete the Project on time or to do business differently? The GED policies could make this Project different.

This policy represents the new rules of engagement. It’s not just a nice-to-do anymore. Nalcor has an opportunity to complete the Project on time and set a new model for doing business differently.

The framework contains some strong impressive elements but will there be enough change in construction’s normal way of doing business. For example, will it be possible for a single mother to participate?

There seems to be evidence of good consultation but the door is still closed in some ways. It seems Nalcor often presents the finished document with no further consultation.

An important phrase in the agreement is “continuous improvement” – this is essential to long-term success.

There are many great positive comments but the devil is in the details. We are in an abstract position right now.

We seem to be in a state of positive skepticism. There is concern that LCP has not been as free-flowing with information as it appears. Example: lack of participation in the NLOWE conference and ANC symposium.

We need to know specific employment numbers; this information is critical, especially from a training and readiness point of view. Example: Qualipu has 23,000 members - in order to participate, information is needed to help them prepare for opportunities.

We are in the midst of cultural change. The province has come a long way but LCP needs to be realistic about what’s achievable. Look at low-lying fruit. How can LCP set an example? Be reasonable with short and long term goals.

Every Project has a unique opportunity to set an example. This is an opportunity for Nalcor to set a new best practice.

We are seeing big change in this province – policies and structure and participation is getting better.

We need a commitment to results versus a commitment to action. The focus needs to be on what plays out at the ground level.

We have a five-year window. This can be a model GE&D program. Community organizations must also take responsibility for pushing back and demanding change. Look at the RNC example – what if LCP were given a human rights exemption on targeted hiring?

What happens after five years? Do we need a broader perspective, industry-wide, on how we train people and keep them employed in this province in the long term?

There seems to be organizations missing in the conversation – labour and union groups, for example.

We need to address the perception of Newfoundland in international circles - we may need to look far and wide for Project recruitment.

We need an independent monitor on this Project.

Why was this program not in place prior to the start of preliminary works? We (stakeholder organizations) need to be able to prepare our members; we can’t do this without information.

Recommendations for implementing the program:

Specific targets: Provide more information on the Program with regard to monitoring and enforcement. Details are needed beyond the policy framework. An independent monitor (specific to GED) is needed for the entire Project to ensure policies and targets are met.

Childcare: Hire early childhood educators to support families in communities but also on worksites, enabling workers to bring their small children to job sites. Pay these workers well. Support small businesses in opening childcare operations. Consult with workers and their families in developing the childcare strategy.

Minimum GD&E targets: Clearly communicate specific targets. Consider developing policies and practices that will support sustainable employment. A coordinated industry-wide approach is needed. Regarding procurement, the GED requirement needs to be stronger and have more importance in terms of minimum requirements and the weight that meeting these standards will be given in the tendering process.

Database: We need industry-wide access to information on women working in non-apprenticed trades. The GED Program is a good opportunity for Nalcor to spearhead this collaboration.

Hiring: Seek to hire and contract those who are already committed to diversity, versus hiring with an intention to train.

Disability: This needs to be reflected more strongly in the policy framework. It seems to be missing. A key issue for the disabled is feeling safe to disclose their disability. The disability must be acknowledged and accommodated. The current plan feels more reactive than proactive regarding disability.

Recruitment: Tap into all available pools of diverse talent. International recruitment needs to be reflected in the planning; labour shortages in the province will demand this.

Communication and consultation: Nalcor must share its GED results with stakeholders. We need to hold more meetings like this focus group but include more groups, such as unions. Think broadly about consultations for the benefit of industry. Need to participate in more front line sessions with stakeholder groups, providing information to members. Circulate the policy draft to a broad selection of stakeholders to gather feedback before finalizing it.

Best practices: Learn from the gender equity and diversity practices in Long Harbour. They are seeing good results.

Language: User-friendly language is needed in recruiting suppliers and employees. This is a complex Project and it can't be assumed that people understand the complex language – it can be a barrier to participation.

How organizations can help implement the program:

We can support GED communication by getting information out to our members – we can use our distribution networks.

We can help access funding and link to opportunities that are already in place, such as in the area of childcare.

We can share our database information to support a larger industry employment database. We can also contribute to the analysis involved in setting annual GED targets and assessing results.

We can support training initiatives, such as diversity training, welcome-to-the-workplace training, etc. Some of these programs are already available.

Work with us on international opportunities. There are several organizations with expertise in the area.

Work with our existing certification programs, such as WE Connect, to support the women's targets.

We can provide expertise in assessing work sites from diversity and culture perspectives. This will help accommodate culture-specific areas, such as Aboriginal ceremonies.

Gender Equity & Diversity Focus Group Invitation List

Happy Valley-Goose Bay Invitation List	
Organization	Contact Person
Women's Resource and Information Centre (Labrador West)	Noreen Careen, Coordinator
Labrador West Status of Women Council	Noreen Careen, Executive Director
Mokami Status Of Women Council	Petrina Beals, Coordinator
Labrador Regional Coordinating Committee – Violence Prevention Labrador	Carmen Hancock, Coordinator
Libra House	Janet O'Donnell, Executive Director
Mud Lake United Women's Group	Vyann Kerby
Labrador Friendship Centre	Jennifer Hefler-Elson, Executive Director Denise Cole, Homelessness Coordinator
Labrador West Association for Community Living	Tony Lawrence
Lake Melville Community Employment Inc. (persons with disabilities)	Donna Roberts, Executive Director
Labrador Aboriginal Training Partnership	Keith Jacque
Hope Haven Inc.	Marsha Power Slade
Sheshatshiu First Nation	Amanda Hill Theresa Gregorie Shirley Penashue
Mushuau Innu First Nation	Angela Pasteen
NunatuKavut Community Council	Dorothy Earl
Nunatsiavut Government	Rexanne Crawford, Deputy Minister Finance, Human Resources and Information Technology
Human Resources Labour and Employment	Erica Stockley
Aboriginal Affairs and Northern Development Canada	Jennifer Taylor
Inuit Women	Myrtle Banfield
Coalition of Persons with Disabilities Newfoundland and Labrador	Cyril Peach

St. John's Invitation List	
Organization	Contact Person
Woman's Policy Office	Heather McLellan, ADA
Newfoundland and Labrador Organization for Women Entrepreneurs	Paula Sheppard, Executive Director
Office to Advance Women Apprentices	Karen Walsh, Executive Director
Women in Resource Development	Charmaine Davidge, Executive Director
Women in Science and Engineering	Gloria Montano, President
Multicultural Women's Organization	Kaberi Sarma-Debnath, Executive Director
Provincial Advisory Council on the Status of	Linda Ross, President

St. John's Invitation List	
Organization	Contact Person
Women	
Newfoundland Aboriginal Women's Network	Sheila Robinson, President
St. John's Native Friendship Centre	Karen Miller, Women's Program Coordinator
Association for New Canadians	Bridget Foster, Executive Director
Office of Immigration and Multiculturalism	Nellie Burke, Director
Federation of Newfoundland Indians	Brendan Sheppard, Executive Director
Qalipu	Keith Goulding
Miawpukek First Nation – Conne River	Mi'sel Joe, Chief Tammy Drew, General Manager
St. John's Native Friendship Centre	David Penner, Executive Director
Coalition of Persons with Disabilities Newfoundland and Labrador	Michele Murdoch, President
St. John's Status of Women's Council & St. John's Women's Centre	Leslie MacLoud
Department of Natural Resources	Tanya Noseworthy
Department of Education – Apprentices Registration	Cliff Mercer
Partners for Workplace Inclusion	Sandra Whiffen, National Manager
Division of Institutional Services	Candice Ennis-Williams, Director

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Appendix D
LCP Site Handbook



Nalcor Energy Lower Churchill Project

LCP Site Handbook

LCP-PT-MD-0000-HR-MN-0001-01

Revision: B1

Last Updated: February 2014



LOWER CHURCHILL PROJECT SITE HANDBOOK

Information in this Site Handbook is proprietary to Nalcor Energy – Lower Churchill Project (LCP). Hard copies of this handbook are not reissued for every update.

Emergency Response

Medical Centre _____

Emergency Response _____

Radio Channels _____

Contact Numbers

Main _____

Security _____

Supervisor Name _____

Supervisor Phone _____

Local Safety Advisor _____

Location of Closest Medical Provider

Location of Emergency Muster Station

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Welcome to the Lower Churchill Project

On behalf of Nalcor Energy, I would like to welcome you to the Muskrat Falls, Lower Churchill Project (LCP). As part of the LCP, you are a valued member of our team.

Nalcor is committed to promoting and maintaining a positive project culture throughout the various phases of the LCP. The pages of this Handbook set out the standards of conduct to be followed by all personnel. It outlines practices to maintain a work environment that is safe, healthy and environmentally friendly, as well as addressing issues associated with ensuring a respectful and productive workplace.

The LCP will set the standard for execution of major project work in Newfoundland & Labrador. Our priorities are our people, and we will lead the industry in labor relations, safety and productivity.

You have been provided with a copy of the LCP Site Handbook and are required to read and comply with the safety absolutes, rules and other requirements contained in the Handbook.

Thank you and again, welcome to the Muskrat Falls Lower Churchill Project.



Paul Harrington
Project Director, Lower Churchill Project

Occupational Health and Safety Policy

The safety of our employees, contractors, visitors and the public is our first and most important priority. Our goal is a workplace where nobody gets hurt – zero harm – and a working environment where each and every employee is always concerned for their own safety and the safety of others. In support of this goal, Nalcor Energy and its employees are committed to the following guiding principles:

- 1) Employees will govern their actions in accordance with Nalcor Energy's Internal Responsibility System for safety. This includes adherence to the principles of employee and role related responsibilities for their personal safety and the safety of their co-workers, contractors, visitors, and members of the public.
- 2) Nalcor Energy shall establish and maintain an Occupational Health & Safety Management System (HSMS) which:

- a. meets or exceeds legislated requirements and is compliant with accepted industry standards and practice; and
- b. documents health and safety objectives for Nalcor Energy; and
- c. contains a mechanism for performance measurement and continuous improvement; and
- d. facilitates both the formal and informal involvement of employees in the development, maintenance, and improvement of occupational health and safety within the organization.



President and CEO
Nalcor Energy

Environmental Policy and Guiding Principles



All Nalcor Energy companies will help sustain a diverse and healthy environment for present and future Newfoundlanders and Labradorians by maintaining a high standard of environmental responsibility and performance through the implementation of a comprehensive environmental management system.

The environmental principles that follow guide Nalcor Energy companies' environmental actions and decision-making:

Prevention of Pollution

- implement reasonable actions for prevention of pollution of air, water, and soil and minimize the impact of any pollution which is accidental or unavoidable;
- use the Province's natural resources in a wise and efficient manner;
- use energy as efficiently as possible during the generation, transmission, and distribution of electricity, and the operation of its facilities, and promote efficient use of electricity by stakeholders;

- maintain an adequate level of emergency preparedness in order to respond quickly and effectively to environmental emergencies; and
- recover, reduce, reuse and recycle waste materials whenever feasible.

Improve Continually

- audit facilities to assess potential environmental risks and to identify opportunities for continual improvement of environmental performance;
- establish environmental objectives and targets, and monitor environmental performance;
- integrate environmental considerations into decision-making processes at all levels; and
- empower employees to be responsible for the environmental aspects of their jobs and ensure that they have the skills and knowledge necessary to conduct their work in an environmentally responsible manner.

Comply with Legislation

- comply with all applicable environmental laws and regulations, and participate in the Canadian Electricity Association's Sustainable Electricity Program;
- periodically report to the Board of Directors, Leadership Team, employees, government agencies, and the general public on environmental performance, commitments and activities;

- monitor compliance with environmental laws and regulations, and quantify predicted environmental impacts of selected activities on the environment; and
- respect the cultural heritage of the people of the Province and strive to minimize the potential impact of Corporate activities on heritage resources.

Approved by: _____



Date: February 3, 2010

Version: 3



About this Handbook

This Handbook provides background information about the Lower Churchill Project (LCP), general health and safety information, as well as information about human resources and labour relations. Please read the Handbook carefully and if you have any questions, ask your supervisor or a member of the management team.

This Handbook is not intended to address all of the LCP's policies, procedures, standards and operating practices. Personnel should confer with their supervisor if guidance or assistance is required for matters that are not addressed in this Handbook.

Written guidelines assist the efficient operation of an organization and support the fair treatment of all personnel. *While this Handbook attempts to set out guidelines for personnel practices on the project, business circumstances, revisions in the law and other factors may make revisions necessary.* In such cases, efforts will be made to communicate the change to those affected. By accepting or continuing their employment, personnel of Nalcor and Nalcor's contractors agree to conform to these guidelines, policies, procedures and standards. This Handbook is not intended to be and does not constitute a contract of employment. It is published for

informational purposes only. The guidelines, policies, procedures outlined in this Handbook may be changed, modified, superseded, suspended or cancelled at any time at the sole discretion of Nalcor with or without prior notice. From time to time specific locations, divisions and organizations may implement guidelines more appropriate to their working environment, industry practices or special needs than the general guidelines contained in this Handbook.

Despite the geographical locations under which the project is being constructed, good management principles dictate fair, equitable and consistent application of policies. While this is always considered, it is not possible in every instance because of the nature and the variety of work situations and location requirements.

As a prerequisite to starting work on the Project, potential employees and new hires must attend an LCP pre-employment orientation session that includes but is not limited to, health, safety and environmental obligations, human resources policies, including respectful workplace; cultural sensitivity, Innu cross-cultural training; gender equity and diversity; labour relations, including an overview of the collective agreement, site standards, rules, corrective action and dispute resolution. Upon successful completion of the LCP pre-employment orientation, new hires will then complete a job site specific orientation facilitated by their respective contractor.

Scope

This Handbook applies to the construction of Phase One of the LCP, the Muskrat Falls Project. It is applicable to all workers that travel to and work on any of the project sites (outlined in the Project Description Section) including members of the Nalcor owner's team, contractors, suppliers and union members.

Who We Are and What We Are Committed to Achieving

Nalcor Energy

Nalcor Energy is Newfoundland and Labrador's energy company. Headquartered in St. John's, the company's business includes the development, generation, transmission and sale of electricity; the exploration, development, production and sale of oil and gas; industrial fabrication; and energy marketing.

Focused on sustainable growth, the company is leading the development of the province's energy resources and has a corporate-wide framework which facilitates the prudent management of its assets while continuing an unwavering focus on the safety of its workers and the public.

Nalcor currently has six lines of business: Newfoundland and Labrador Hydro, Churchill

Falls, Oil and Gas, the Lower Churchill Project, Bull Arm Fabrication and Energy Marketing.

Nalcor's vision is to build a strong economic future for successive generations of Newfoundlanders and Labradorians.

Five goals drive Nalcor's business:

- 1) Safety: to be a safety leader;
- 2) Environment: to be an environmental leader;
- 3) Business Excellence: through operational excellence, provide exceptional value to all consumers of our energy;
- 4) People: to ensure a highly skilled and motivated team of employees who are committed to Nalcor Energy's success and future direction;
- 5) Community: to be a valued corporate citizen in Newfoundland and Labrador.

The Lower Churchill Project

The LCP is one of the most attractive undeveloped hydroelectric sites in North America and is a key component of the province's energy warehouse. The LCP's two sites at Gull Island and Muskrat Falls have a combined energy capacity of over 3,000 megawatts (MW). The clean, stable, renewable electricity provides an opportunity for the province to meet its own domestic and industrial needs in an

environmentally-sustainable way, and also export electricity to other jurisdictions where the demand for clean, renewable energy continues to grow.

Nalcor is developing Phase One of the LCP which includes an 824 MW hydroelectric generating facility at Muskrat Falls and associated transmission links to Newfoundland and Nova Scotia.

Project Description

LCP Phase One development includes the following key components:

The **Muskrat Falls Generation** will consist of the construction of an 824 MW generating station with a powerhouse that will contain four turbines. A 59km long, 101 km² reservoir will be contained by a concrete dam on the north side of the river and a rock filled dam on the south side.

The 900MW, 350 kilovolt (kV) bi-pole **Labrador-Island Transmission Link** is a 1,100km long High Voltage direct current (HVdc) interconnection that will run from the Muskrat Falls generating station to Soldiers Pond near Holyrood, Newfoundland. Each end of the line energy will be connected from AC to DC and vice versa through converter stations and switchyards.

The **Labrador Transmission Assets** includes two 247km, 315kV High Voltage alternating current (HVac) transmission lines connecting Muskrat Falls generation station and Churchill Falls generation station, along with switchyards at both Muskrat Falls and Churchill Falls to facilitate the connection of the 315kV feed.

In addition, Emera Newfoundland & Labrador Inc. will construct a 500 MW, 250kV 480km HVdc **Maritime Transmission Link** from Cape Ray in western Newfoundland to Lingan, Nova Scotia.

Nalcor's Core Values

Nalcor aspires to be a proud, diverse energy company, whose people are committed to building a bright future for Newfoundland and Labrador, unified by its core values:

Open Communication: Fostering an environment where information moves freely in a timely manner.

Accountability: Holding ourselves responsible for our actions and performance.

Safety: Relentless commitment to protecting ourselves, our colleagues and our community.

Honesty and Trust: Being sincere in everything we say and do.

Team Work: Sharing our ideas in an open and supportive manner to achieve excellence.

Respect and Dignity: Appreciating the individuality of others by our words and actions.

Leadership: Empowering individuals to help guide and inspire others.

Nalcor's Code

Nalcor's Code of Business Conduct and Ethics (Code) reinforces the company's commitment to professional and ethical business practices. All Nalcor employees, contractors and unions should adhere to the Code.

Four key principles guide how we should apply the Code in our day-to-day work:

- The commercial, reputational and other interests of Nalcor must always take precedence over personal interests and those of third parties;
- We must always avoid any act or conduct – intentional or not – that may support the private interests of a third party or an individual over those of Nalcor;
- Any conflict of interest – real or perceived – has the potential to impair the company's credibility, reputation and commercial interests;

- We have an obligation to perform our duties and responsibilities in a conscientious manner, and never allow our personal interests to conflict with those of Nalcor.

**Health
and Safety**

Health and Safety

The health and safety portion of this Handbook is based on the Lower Churchill Project Health and Safety Management Plan. The Health, Safety and Security practices outlined in this Handbook are not a substitute for the required safety training and safe work practices and procedures.

Nalcor Energy's Safety Credo

The safety of employees, consultants, contractors, visitors and the public is our core value. Our goal is a workplace where nobody gets hurt – zero harm – and a working environment where each and every employee and contractor is continuously concerned for their own safety, and the safety of others.

Nalcor's Safety Credo states three basic rules that must be applied to the workplace:

- ***I always follow safety requirements and best practices;***
- ***I always take time to complete my work safely;***
- ***I always take action when I see unsafe acts or conditions.***

Safety Absolutes

In an effort to achieve our “Zero Harm” target, a number of safety absolutes have been established. Close attention should be paid to the violations listed below, which will lead to the denial or revocation of site access and termination of your employment by your employer, unless there are exceptional mitigating circumstances:

- Tampering with safety devices or emergency response equipment;
- Operating equipment or vehicles without the proper licensing, authority, training or qualifications;
- Willful damage to property and/or equipment;
- Blatant disregard of properly marked zones of imminent danger (e.g. flagging);
 - Falsification of reports, statements, or records;
 - Non-compliance of the information contained in the two day Fall Protection standard prescribed by WHSCC, NL including training, proper selection of fall protection equipment and anchorage points for any work above six feet or less if there is an unusual possibility of risk or danger;
- Any violation of energy isolation procedures (e.g. mechanical, electrical, pneumatic);

- Unauthorized modification of scaffolding or other work platform leading edges;
- Working without a construction permit as specified on the StepBack card;
- Failure to conduct a StepBack Field Level Hazard Assessment **prior** to starting every assigned task and/or task change;
- Refusal to submit to requested searches (e.g. vehicle, toolbox, lunchbox);
- Non-compliance with the Lower Churchill Project Standard for Drug and Alcohol, including but not limited to:
 - Reporting for work under the influence of alcohol or illegal drugs;
 - Possession of alcohol, illegal drugs or illegal drug paraphernalia;
 - Distribute, sell or attempt to sell drugs or illegal drug paraphernalia, or engage in unauthorized distribution, offering, or sale of prescription medication;
 - Refusing to submit to a requested just cause or post incident drug and alcohol test;
- Physical harassment of other site personnel;
- Operating mobile machinery and equipment while using cellular devices or without the use of a seatbelt;
- Walking or working under a suspended load;
- Serious violation of safety policies, procedures or standards (ex. lock-out violation or confined space violation).

Project Personal Protective Equipment (PPE) Standard

All personnel entering a LCP work site must adhere to the PPE Standard at all times.

- Class E or G CSA Type II approved hardhat at all times. Unless otherwise approved for trade specific, the bill of the hard hat must face forward unless a safety device, like a welding shield, is attached. Hardhat hood combinations are mandatory for all welders on site;
- Wear CSA approved safety glasses with approved side shields during work hours. No dark glasses inside dark buildings or in poor light;
- Cut resistant gloves must be worn at all time when handling knives or other tools with exposed blades as well as material with sharp surfaces;
- Gloves are required for all tasks. Hand protection appropriate for the hazard must be worn;
- Reflective apparel, when required, must meet minimum CSA Class 2, level 2 requirements;
- Safety boots (steel toe and a minimum 6" boot height).

Any requirements for additional task-specific PPE will be determined through a risk assessment. (TBRA- Task Based Risk Assessment)

Project Safety Orientation

The project Safety Orientation is a prerequisite to entering any LCP site, except for those persons entering the site as a visitor (visitors must be accompanied by a designated, orientated Project person at all times and will abide by the LCP Health & Safety Management Plan and will receive a Visitor Safety Orientation).

Drug and Alcohol Standard

The Project team has developed a Drug and Alcohol Standard based on the Canadian Model for Providing a Safe Workplace. Contractors must ensure that all workers deployed to any project site are fit to safely and reliably perform their work duties, and that these workers must remain fit for duty throughout their work shift, and free from impairment due to alcohol and/or drugs. Workers will submit to a drug and alcohol testing procedure in the following circumstances: pre-access; reasonable cause and post-incident. Contractors must have a drug and alcohol policy that is at least equivalent to the requirements set out in the Canadian Model and this standard.

Nalcor has declared the LCP worksites as “Dry Sites”, whereby the possession, use and sale of alcohol are strictly prohibited.

Non-compliance of this standard will result in denial or revocation of site access and

termination of your employment by your employer, unless there are exceptional mitigating circumstances.

Incident Notifications Requirements

All incidents must be reported verbally **within two hours of occurrence** through the safety management organization. The severity of the incident or the severity potential determines the reporting/notification requirements for each incident. A written (preliminary) report is required to be prepared by the employee's employer within 24 hours of occurrence. All Near Miss situations and Hazardous Conditions/Behaviors will be reported promptly using the same incident report process described above. These situations will be looked upon as a learning opportunity and will be treated seriously.

Near Miss Incidents having serious potential (an incident where, under other/different circumstances, could have resulted in serious injury or fatality) will be included in Nalcor's Safe Workplace Observation Program (SWOP) database and will be fully investigated and have mitigating measures identified and tracked to completion. Other Near Miss Incidents will be recorded and, as appropriate, investigated, to derive any lessons learned (as noted above). All incidents will be communicated to affected and

potentially affected personnel and addressed in tool box talks and safety meetings as a means to increase overall awareness in an effort to prevent similar incidents from recurrence.

Case Management

All incidents resulting in personal injury will be effectively managed in order to:

- Prevent further injury;
- Aid in the recovery of the injured person;
- Reduce the possibility of an incident classification escalation (i.e. from a first aid incident to a medical aid or lost time, etc.);
- Ensure adherence to all applicable Workplace, Health, Safety and Compensation Commission requirements;
- All LCP contractors will have an effective modified duty program;
- All injured persons will be offered meaningful modified work if approved by the attending physician, and where appropriate an independent physician;
- These modified duties will meet all restrictions placed on the injured person by the attending physician.

Security

LCP security management may include, but is not limited to the following procedures that:

- Control access of all personnel, vehicles and material through the use of swipe cards, vehicle permits, material lists and passes, camera passes, visual vehicle inspections, and property searches;
- Ensure visitors are properly registered, equipped with the suitable PPE for the area they are visiting, given an appropriate orientation, and accompanied by a responsible person;
- Prevent unauthorized entry and removal of materials and equipment using video surveillance and inspection of personal property including brief cases, back packs, lunch boxes, tool boxes, vehicles and any other item at the discretion of security management.

Joint Occupational Health and Safety Committee (JOHSC)

It is the policy of Nalcor as well as a regulatory requirement to ensure that all personnel are provided an opportunity to be involved in health and safety program development and improvement efforts. Formal health and safety committees provide leadership and direction for the project and allow for participation and input at all levels. The Health and Safety Committee structure is designed to establish positive, two-way communication throughout the organization and facility. The organization and function of the

Health and Safety Committee shall be designed to meet the intent of applicable Newfoundland and Labrador legislation.

Safe Work Practices and Procedures

The LCP team will ensure there is adequate and appropriate development and implementation of safe work practices by project contractors, based on the contractors' scopes of work. All contractors and workers are responsible to ensure they have sufficient and correct training to use these practices and procedures. Quarterly inspections are required on the project.

Housekeeping

Keeping your work area tidy encourages safe work habits. Good housekeeping is a basic requirement in all construction areas and shall be maintained at all times. The following general housekeeping requirements apply:

- Clean up regularly as the job progresses;
- Ensure equipment and tools are stable and secure, cannot fall over or from the work area, and are stored appropriately;
- Ensure that all stored hoses, cords and cables are neatly coiled and hung on appropriately designed hangers off the ground;
- Keep the floor, ground and gratings clear of tools, welding materials and waste, metal shavings, etc.

- Store or contain material in such a way that prevents a potential fire from starting.

Access and Egress

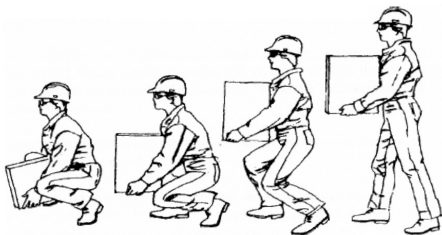
- Routes leading to and from all work locations shall be kept free and clear of obstructions and be well lit;
- Walkways and stairways shall be clear, ladders shall not be blocked, and emergency exits shall be easily identified and clear of all obstructions. Stairs, landings and platforms shall have proper handrails;
- Never block the access to any emergency equipment, fire extinguisher or electrical disconnect switch.

Avoiding Slips and Trips

- Keep work areas well lit and organized;
- Clean up any spills immediately;
- Keep snow and ice off walkways;
- Practice safe walking skills by taking shorter steps and paying continuous attention to your path;
- Practice three point ascent and descent on ladders;
- Walk at a steady pace and do not run;
- Use the walkways and accesses provided;
- Always use handrails on stairways.

Material Handling - Save Your Back

Improper lifting and handling may lead to serious back injuries. Mechanical handling is required and shall be utilized for lifting all items over 25 kg (55 lb.). When lifting by hand, abide by the 25 kg limit and use the following lifting techniques:



- Always wear gloves;
- Know the weight of any object to be handled;
- Plan your lift, test the load and ask for help when needed (e.g., awkward or slippery packaging);
- Get a firm footing, bend your knees and tighten your stomach muscles;
- Lift with your legs and keep your back straight;
- Keep the load close to your body;
- Keep your back upright and do not twist when moving and carrying the load;
- Avoid stairs and inclines when carrying heavy objects;

- Manual lifting of tools or equipment when using a ladder is prohibited (three-point contact must be maintained on the ladder at all times).

Welding and Cutting

During any welding or cutting procedures the worker shall:

- Inspect all leads, grounds, clamps, welding machines, hoses, gauges, torches, and cylinders each day before use and ensure that all fittings, couplings and connections are tight;
- Only use cutting torch, welding and oxygen/fuel gas systems equipped with anti-flashback arrestors at the regulator and at the torch;
- Keep welding leads and oxy/acetylene hoses clear of passageways and protect them from damage;
- Erect proper barriers or screens to protect other workers from exposure to welding flash;
- A trained fire watch is required in areas where there is a potential for fire;
- Ensure that a 9kg/20lb ABC dry-chemical fire extinguisher is immediately available in the work area.

Ladder Safety

Ladders shall be commercially manufactured and comply with CSA Standard CAN3-Z11-M81 (R2001), *Portable Ladders*. All ladders shall only be utilized within the safe working load and conditions that are listed on the ladder. No “job built” or other similar type ladders shall be used.

Inspect the ladder before each use for signs of damage and ensure the following safe ladder procedures are used:

- Face the ladder when climbing up or down, and always maintain 3-point contact;
- Change the position of the ladder if required to avoid overreaching (“rule of thumb”: keep your belt buckle within the rails of the ladder);
- Tag and remove damaged ladders from service;
- Use a rope and canvas tool bag or bucket to move tools and material to working heights. Do not carry tools or materials when using a ladder;
- Always fully open a stepladder and set it level on all four feet, with spreaders locked in place;
- Never use a stepladder like a straight ladder;
- Do not use the top two steps of the stepladder;

- Always place ladders against solid surfaces;
- The vertical distance must be four times the horizontal distance and the top of the ladder shall extend a minimum of 1m (3 ft.) beyond the supporting object;
- The ladder shall be adequately tied off at the top and bottom;
- Do not use extension ladder sections separately.

Scaffolds

Scaffolds shall only be erected and dismantled by qualified scaffold erectors. Do not combine parts and sections of scaffolding made by one manufacturer with those made by another manufacturer.

Scaffold Tagging

The tagging color code to be used is:

Red: *“Danger – Do Not Use”* – Scaffold is incomplete

Yellow: *“Caution”* – Special requirements for use (e.g., fall arrest equipment is required)

Green: *“Safe for Use”*

A worker shall not use a scaffold if it has:

- A red tag;

- A green or yellow tag that has expired;
- No tag at all.

Flagging and Hazard Signs

Flagging is used to warn of hazards that exist in work areas. When flagging an area:

- Flag off only the areas where the hazard exists;
- Use the appropriate type of flagging for the hazard and completely fill out the flagging tag;
- Remove the flagging promptly when complete;
- Tagging should be included and kept current on all flagging for the purpose of identifying the person who has erected the flagging, the purpose of the flagging, and contact information in the event entry is required.

Red Flagging:

“Danger – Do Not Enter” flagging is to be used where the risk factor to personnel working in the immediate area is high. No access is allowed, except for the crew doing the work.

Yellow Flagging:

“Caution” flagging is to provide a warning that hazards exist in an area and you should look for

an alternate route. If no alternate route is available, read the flagging tag, look for and plan to avoid the hazard, ask permission of the workers inside and proceed with caution.

Radiation Flagging:

Radiation barriers are yellow and magenta colored flagging, or ropes and radiation signs.

Warning Signs:

Warning signs are used to indicate specific hazards (e.g., *“Danger – High Voltage”* *“Caution – Overhead Work”* etc.).

Excavations

All excavations shall comply with the following rules:

- All excavations must be identified to other workers through flagging, marking; safeguards, or other appropriate and effective means;
- All excavation walls shall be checked before entering, especially after a heavy rain or thaw;
- Shoring shall be checked daily or more often in extremely wet weather;
- No worker shall be in an excavation when any equipment is working next to the edge – keep all heavy equipment away from trench edges;

- Test for low oxygen, hazardous fumes, and toxic gases – the excavation may be a confined space. ie: Excavations deeper than 4 feet;
- Ensure there are safe and adequate ladders for access/egress.

Vehicle Requirements

Workers shall not use LCP vehicles unless assigned by their supervisor. Any worker who operates a vehicle shall comply with the following requirements:

- Possess a valid driver's license for the class of vehicle being used;
- Inspect the vehicle at the beginning of each shift before use by completing a thorough walk-around and doing operational/functional checks;
- All vehicles shall be equipped with a 9kg/20lb ABC dry-chemical fire extinguisher, a first aid kit – minimum Class 2 and flares;
- "Buggy whips" (minimum 3.6m in height) are required in and around the Muskrat Falls generating station construction area. 3.6m Buggy Whips are not required to be the lighted type;
- Ensure that all tools and materials are transported in a safe and secure manner;
- Wear a seatbelt at all times while driving, both on and off site, and ensure that seat

- belts are worn by all passengers;
- Always give pedestrians the right of way;
 - Observe posted speed limits and other regulatory signs and practice safe driving at all times;
 - Do not use cellular phones or mobile devices unless the vehicle is stopped and parked in a safe location;
 - Practice safe refuelling procedures;
 - Do not ride in the bed of any vehicle;
 - In winter, ensure that all windows and hood and roof are clear of snow, ice and condensation before moving;
 - Immediately report all vehicle incidents;
 - All site vehicles are required to have back-up alarms, sounding the horn twice before backing up is not necessary;
 - Strictly comply with project parking regulations and back into parking areas;
 - Use a spotter when backing a vehicle into a congested area or under circumstances with limited clearance or visibility;
 - Heavy haul vehicles have the right of way on work site locations;
 - All site light vehicles are required to have a rotating/revolving amber coloured beacon mounted on the top of the cab and must be fully operational when driving on the site. Amber light should be turned off after the vehicle has left the project footprint.

Pedestrian Safety

- Walk on the left side of site roads unless directed to do otherwise;
- Do not take shortcuts through other construction areas or buildings;
- Wherever there exists potential interaction between pedestrians, vehicles and heavy equipment designated walkways will be established and well-marked. It is mandatory that all pedestrians utilize these walkways;
- Scan ahead for potential hazards in the work site;
- When walking to a location be aware of your surroundings, always observing for any potential hazards.

Fire Protection

- Fire extinguishers are located where they can be readily accessed in case of fire and are inspected monthly;
- Storage areas for flammable liquids, gas cylinders, explosives, etc., shall be located well away from worksites, field offices and sources of ignition;
- Fire extinguishers and appropriate signage shall be located in the immediate storage area;
- Flammable or combustible liquids shall be stored only in approved metal safety cans and portable tanks. No plastic containers to be used;

- Fire extinguishers required for emergency service shall not be used for construction use;
- Adequate firefighting tools and water will be readily available at all sites in forested areas during forest fire season. Every reasonable effort will be made to ensure that LCP activities do not result in forest fires.

Working at Heights

The Project is committed to providing a safe work environment for its employees and preventing occupational injuries due to falls. Fall Protection is an integral part of our commitment to a safe work environment. Any time a worker is exposed to a fall hazard in excess of two (2) meters, or where there is an unusual possibility of danger, Fall Protection will be required or a procedure and equipment to reduce and/or eliminate the hazard of working at height. Fall Protection shall be achieved through a hierarchy of controls that will involve all levels of management, supervisory and field personnel. This hierarchy shall be: elimination of hazards through engineering (design) and procedural practices; control and mitigation of hazards through passive fall protection; travel restraint systems; the use of fall arrest systems; and finally the use of administrative controls. Supervisors and workers shall be expected to assess the risks associated with a task and ensure that proper mitigation is in place to protect them while

climbing and working at heights. Where a worker is unsure of the methods, equipment or procedures to reduce the risk they are to seek direction from their supervisor.

Energy Isolation (Lock-out/Tag-out)

The purpose of having an energy isolation standard is to eliminate or minimize the risk of fatalities, injuries and incidents arising from the uncontrolled and unexpected release of energy or hazardous materials. The standard applies to all sources of energy including: electrical, mechanical, hydraulic, chemical, gravitational, pneumatic, kinetic and stored energy.

The failure to isolate an energy source can create an immediate danger to life and health situation. A high portion of energy related incidents are caused by inadequate or improper isolation of the energy sources. The causes or contributing factors to these incidents have been:

- Failure to identify or recognize a source of potential or stored energy;
- Inadequate training or competence;
- Inadequate energy isolation systems;
- Complacency;
- Working on, or isolation of wrong equipment;
- Inadequate design and/or maintenance of isolators.

The requirements of the Lower Churchill Project for Energy Isolation include the following:

- Purchase and design of equipment shall be given due consideration to meeting energy isolation standards;
- Isolation shall provide positive protection and be achieved by use of locking devices or the establishment of a physical barrier or separation. All separations or barriers shall be provided by either a permanent or temporary fitted locking device;
- Personal locking devices shall be 1) uniquely keyed, 2) not be of the combination lock type, 3) not have an unauthorized second-party master over-ride key, 4) be kept under the exclusive control of the owning individual and key shall not be transferred from one person to another during the course of the work;
- Designated isolation points shall be clearly labeled at all times to identify the circuit or system over which they have direct control. These labels shall be applied following a process of pre-isolation identification using isolation lists, load verification, marked drawings, etc.;
- Energy Isolation boxes, stations or equivalent shall be provided when required;
- All designated isolations points must be fitted with personal locking devices and shall be tagged. The tags must include the name of the person locking out, the reason for the isolation, the date and time the locking

device was applied and must be highly visible to prevent inadvertent operation.

General Procedures for Energy Isolation include:

- Full compliance with relevant OHS Legislation, regulations and standards;
- A documented Energy Isolation System;
- No work can be carried out on any equipment or system unless it has been established and confirmed that it is in a zero energy state, unless involved with commissioning or troubleshooting;
- The isolation system shall be applied to all activities on the Lower Churchill Project;
- The isolation procedure should determine the appropriate isolation method for any activity (either by way of a full description or by demonstrating the process that shall be followed for new activities);
- Prior to relying on an isolation to supply a safe working environment, documented testing procedures must be provided to verify energy isolation integrity;
- A formal procedure shall be in place for controlling clearances to the work for isolation and de-isolation of equipment, handover and handback of equipment (maintenance to operations), or transfer of isolations between shifts/workgroups;
- Specific procedures shall be developed to address software overrides;

- A procedure for testing and positioning during maintenance and set-up shall be in place;
- A procedure shall be in place to mitigate hazards in special cases where zero energy state, test/try of isolation or use of a locking device are not possible or feasible;
- Formal isolation procedures include requirements for investigation, reporting and removal of personal locks/tags by an authorized person other than the originator. The isolation system must be reviewed regularly and audited to capture any previous unidentified changes and revised when necessary.

Workplace Hazardous Material Information System (WHMIS)

- All contractors will have an established WHMIS program in place for all LCP construction activities;
- All personnel will be trained in WHMIS, including a site specific element;
- All material and containers will be properly labeled;
- Contractors will maintain a complete and up to date set of Material Safety Data Sheets for all controlled products on site.

Environment

Environment

All Nalcor companies will help sustain a diverse and healthy environment for present and future Newfoundlanders and Labradorians by maintaining a high standard of environmental responsibility and performance through the implementation of a comprehensive environmental management system.

Roles and Responsibilities

All project participants have a responsibility for the protection of the environment. Project personnel will:

- Participate in the LCP orientation sessions;
- Be familiar with the environmental mitigation measures specific to their scope of work, as described in the environmental documents;
- Participate regularly in toolbox meetings;
- Report any environmental issues or concerns as outlined in the orientation provided by your supervisor;
- Project personnel are encouraged to reduce/eliminate idling of vehicles where practical.

General Environmental Procedures

Storage, Handling, Disposal of Fuel and Other Hazardous Materials

- All personnel handling fuel and hazardous materials are to be properly trained and informed;
- Fuel may only be stored and transported in appropriate and approved containers;
- Waste products will be properly stored and disposed;
- Fuel and other hazardous materials are not to be poured down drains or permitted to enter the environment in any manner.

Waste Management

- Project personnel are to keep work areas free of food scraps and garbage;
- Project personnel should recycle wherever possible;
- There will be NO littering on site;
- Absolutely NO waste material is to be deposited in any water body.

Water Protection

When working around water bodies Project personnel should:

- Confirm with On-Site Environmental Monitor, proper mitigation measures to be used;

- Report any incidents of failed siltation/soil erosion control structures and incidents of sedimentation of water bodies.

Wildlife

There is a wide range of plants and animals found in the project area, some of which are protected or of special concern. Project personnel should be especially aware of rare birds such as the Common Nighthawk, Grey Cheeked Thrush, Rusty Blackbird, Harlequin Duck, and the Olive Sided Flycatcher as well as Raptors and Woodland Caribou.

- Any sightings of these and other wildlife are to be reported to an On-Site Environmental Monitor;
- Any nest sightings are to be reported to an On-Site Environmental Monitor;
- NO personal pets will be allowed on the site;
- Under NO circumstances is wildlife to be fed, chased, followed, diverted or otherwise harassed;
- Any incident that results in the displacement or fatality of wildlife is to be reported to the On-Site Environmental Monitor;
- Project personnel are not permitted to hunt, fish, or trap wildlife, collect firewood or pick berries, whether on or off duty, at any time during their employment within the Project Area at any LCP work site and support

infrastructure. This includes Project related roads, camps, the main work site, the future reservoir area and associated transmission lines. The attached map illustrates the “no harvesting zone”;

- Project personnel conducting activities outside of the Project footprint who are non-resident to the area may only do so while they are off rotation and in compliance with applicable provincial and federal regulations. Project personnel conducting activities outside of the Project footprint who are resident to the area may only do so outside of their normal hours of work and in compliance with applicable provincial and federal regulations;
- This policy will be strictly enforced through corrective action which would include revocation of site access and termination of your employment by your employer, unless there are exceptional mitigating circumstances;
- Harvesting by Labrador Innu within the Project Area is addressed in the Impacts and Benefits Agreement with the Innu Nation.

Historic Resources

Historical resources can include stone flakes; tent rings; burial mounds; tilts; structural frames; arrowheads, tools and fire pits. If an historic resource or artifact is suspected:

- Stop work immediately, **DO NOT** touch or remove artifact;
- Report the find to a supervisor and On-Site Environmental Monitor.

Spills

In the event of a spill or leak of hazardous materials (including fuels), site personnel should:

- Act immediately;
- Stop source if possible and safe to do so;
- Contain the spilled products if safe to do so;
- Contact your supervisor or the site; emergency contact, providing as much information as available.

Human Resources

Employment Equity

The LCP team recognizes the importance and benefit of a diverse workforce. Employment decisions concerning the workforce on this project shall be based on individual merit qualifications and competence, and the employment preference provisions in the Lower Churchill Construction Projects Benefits Strategy (Benefits Strategy) and the Impacts and Benefits Agreement (IBA) for qualified Labrador Innu. Nalcor is committed to employment equity and will not discriminate on the basis of race, colour, nationality, ethnic origin, social origin, religious creed, religion, age, disability, disfigurement, sex, sexual orientation, marital status, family status, source of income and political opinion. The profitable, responsible growth and business success of the company, as well as the personal growth of individuals, results from using the abilities of all individuals to the fullest extent practical within the framework of the business environment.

Lower Churchill Construction Projects Benefits Strategy

LCP and the Province of NL have agreed to the projects Benefits Strategy. The overriding objective of this strategy is to provide opportunities and benefits to the people of Newfoundland and Labrador during the

construction of the project. Included in this strategy are hiring protocols for different components and geographical areas of the project. These hiring protocols are also contained in the Labour Project Agreements with our Union partners. A summary of these hiring protocols is as follows:

Muskrat Falls Generating Facility and associated HVac Transmission System

For these components of the LCP the priority is as follows:

1. Qualified Labrador Innu as per the terms of the IBA;
2. Qualified residents of Labrador; and
3. Qualified residents of the Island of Newfoundland;
4. Qualified Canadian Residents.

Island Link HVdc Transmission System

For these components of the LCP the priority is as follows:

1. Qualified Labrador Innu for the Labrador portion of this component of the LCP;
2. Qualified residents of Newfoundland and Labrador;
3. Qualified Canadian Residents.

The Benefits Strategy also includes an outline for the project's Gender Equity and Diversity Program. The objective of this program is to address employment Equity for the Project, including access to employment opportunities for qualified members of underrepresented groups. This program will implement programs and practices that contribute to the creation of an inclusive work environment and culture.

The main objective of the Gender Equity and Diversity Program is access to employment opportunities for, and employment of, qualified women and members of underrepresented groups on the project. The program includes a Women's Employment Plan that provides the necessary resources for an inclusive work environment and corporate culture.

The LCP team recognizes the importance of compliance with the commitments and obligations contained in the IBA with the Innu Nation and the Benefits Strategy. These commitments and obligations are supported by Nalcor's Human Resources policies and procedures.

IBA initiatives include Innu cross-cultural training for all employees to enhance understanding of the culture of the Innu of Labrador, and social supports for Innu employees, including opportunities for Innu cultural activities.

Labrador Aboriginal Cultural Awareness

Three distinct Aboriginal peoples reside in Labrador: the Labrador Innu, represented by Innu Nation, the Labrador Inuit, represented by Nunatsiavut Government, and the descendants of Inuit and European cultures, represented by NunatuKavut Community Council.

The Labrador Innu are the indigenous inhabitants of an area they refer to as Nitassinan (“Our Land”). The Labrador Innu claim Aboriginal rights and title to a significant portion of Labrador, including the LCP area. In recognition of this, Nalcor negotiated an Impacts and Benefits Agreement (“IBA”) with the Innu Nation and both Innu First Nation communities. The IBA provides certain benefits to the Innu, including first preference for employment opportunities on the project.

Innu reside primarily in the communities of Sheshatshiu (pop. 1700) and Natuashish (pop. 900), which are reserves under the *Indian Act*. One of the last Aboriginal peoples in Canada to settle permanently, the Innu lived in Labrador as hunter/gatherers for several thousand years until the 1960s when they became permanently settled in communities. The word Innu means “human being” in Innu-aimun, which is the first language of the Innu.

The 6,500 Labrador Inuit call their homeland in northern Labrador “Nunatsiavut.” This means “our beautiful land” in Inuttitut, the traditional language of the Inuit who have lived in Labrador for thousands of years. Labrador Inuit settled their claim for Aboriginal rights and title under the Labrador Inuit Land Claims Agreement, which came into effect in 2005. Labrador Inuit have rights over and/or title to land in Labrador that includes the Inuit communities of Rigolet, Postville, Makkovik, Hopedale and Nain. In addition, many Inuit live in Happy Valley-Goose Bay, Mud Lake and North West River. English is widely spoken by Labrador Inuit, who have had regular contact with European settlers for over 200 years.

NunatuKavut Community Council, formerly known as the Labrador Metis Nation, represents 6,000 descendants of Inuit and European cultures. Members of NunatuKavut live in the southern Labrador communities of Cartwright, Paradise River, Black Tickle, Norman Bay, Charlottetown, Pinsent's Arm, Williams Harbour, Port Hope Simpson, St. Lewis, Mary's Harbour and Lodge Bay, as well as the Upper Lake Melville area.

LCP Respectful Workplace Standard

The project is committed to maintaining a safe, healthy and productive work environment where all persons attending LCP worksites are valued

and treated with respect and dignity. The project has adopted a Respectful Workplace Standard (“standard”) which is intended to support a work environment free of discrimination, harassment, workplace violence and/or threats of workplace violence. All persons engaged in work on the LCP are expected to lead by example to ensure the project is free of discrimination, harassment, workplace violence and/or threats of workplace violence. This standard provides guidelines for Nalcor Energy and its contractors to respond quickly and fairly with any incidents reported under this standard or policy created under this standard.

This Standard supports our Project values:

Open Communication: Fostering an environment where information moves freely in a timely manner.

Accountability: Holding ourselves responsible for our actions and performance.

Safety: Relentless commitment to protecting ourselves, our colleagues and our community.

Honesty and Trust: Being sincere in everything we say and do.

Team Work: Sharing our ideas in an open and supportive manner to achieve excellence.

Respect and Dignity: Appreciating the individuality of others by our words and actions.

Leadership: Empowering individuals to help guide and inspire others.

Application of Standard

This standard applies to all employees and consultants of Nalcor, LCP contractors and any other parties engaged in or performing work on LCP worksites.

This standard applies to visitors, vendors, suppliers, contractors and consultants attending LCP worksites.

All contractors working at any LCP worksite are required to have a Respectful Workplace Policy that meets or exceeds this standard. In the event a contractor does not have such a policy, this standard will constitute the contractor's policy.

Discrimination, Harassment and Workplace Violence

1. Discrimination

“Any action, inaction or behaviour which negatively affects the status of an employee, or the unequal treatment of an employee or harassment on the basis of prohibitive grounds as defined under Human Rights Act, 2010, SNL2010 CHAPTER H-13.1, s. 9 (j) and s. 14 (j) including race, religion, religious creed, political opinion, source of income, color, nationality, ethnic origin, social origin, sex, sexual orientation, marital status, family status, disfigurement, disability, age and

conviction of a criminal offence unrelated to employment.”

2. **Harassment**

Harassment is any form of conduct that is known or reasonably ought to have been known to:

- a) Create an intimidating, hostile or offensive work environment;
- b) Be objectionable or offensive behaviour that is unwelcome;
- c) Adversely affect an individual’s employment relationship or work performance; or
- d) Deny an individual dignity and self-respect.

3. **Sexual Harassment**

Any conduct, comment, gesture, or contact of a sexual nature, whether one-time or on a continuous basis that:

- a) Might reasonably be expected to cause offense or humiliation;
- b) Is known or ought to reasonably be known as unwelcome;
- c) Is made to an individual by another individual where the other individual is in a position to confer a benefit on or deny a benefit to, the individual to whom the solicitation or advance is made, where the individual who makes the solicitation or advance knows or

- reasonably ought to know that it is unwelcome;
- d) Is a retaliation or threat of retaliation against an individual for rejecting a sexual solicitation or advance; or
 - e) Might reasonably be perceived as placing a condition on employment or opportunity for training, promotion or career development.

4. **Workplace Violence and/or Threat of Workplace Violence**

Any inappropriate physical contact or action, or threat of inappropriate physical contact or action, that would result in pain and/or suffering to individuals. This includes behaviour that would be interpreted by a reasonable person as a substantial threat to harm another person, or endanger the safety or wellbeing of another person, as well as any aggressive or bullying behaviour that is intended to cause emotional or physical distress to a person.

Workplace harassment, workplace related harassment or any other violations of this standard or any policy created under this standard, by any means of communication including but not limited to social media (i.e. Facebook, Twitter, MySpace, Blogging, etc.), email or texting during or outside work hours is strictly prohibited. Any form of workplace harassment, workplace related

harassment or other violation of this standard or any policy created under this standard, may lead to revocation of site access and discipline by your employer up to and including termination.

5. Examples of Discrimination, Harassment, Sexual Harassment, Workplace Violence and/or Threat of Workplace Violence

Discrimination, harassment, sexual harassment, workplace violence or threat of workplace violence can take many forms including but not limited to jokes, insults, threats, personal comments or innuendoes. The following are some examples:

- a) Posters, pictures, graffiti or derogatory statements;
- b) Insults, slurs and negative stereotyping;
- c) Threatening, intimidating and hostile acts;
- d) Written or graphic material, including email and internet material, that denigrates or shows hostility towards an individual or group;
- e) Touching, pushing, pinching, or any unwelcome physical contact including but not limited to physical assault, offensive comments, leering or similar gestures; and
- f) Profanity and offensive language; verbal and physical threats or assault;

intimidation; taunting or ostracizing; rude or inappropriate jokes or innuendos; overly aggressive, embarrassing, humiliating or demeaning behaviour; and malicious gestures or action.

6. **What Harassment is Not**

Examples of what is not harassment or behaviour that does not offend this Standard are the following:

- a) Chit-chat or good-natured jesting when both parties find the conduct acceptable;
- b) An occasional compliment or remark;
- c) Workplace flirtation when it is a voluntary relationship to which neither objects;
- d) Normal exercise of supervisory responsibilities including training, counselling and discipline or a particular supervisory style; and
- e) Personality differences between people

Individual Responsibility

All individuals are responsible for:

1. Abiding by this standard or any policy created under this standard;
2. Fostering a respectful workplace where discrimination, harassment, workplace

- violence and/or threat of workplace violence is not tolerated; and
3. When encountering behaviour which violates this standard or a policy created under this standard, immediately advise the individual (where possible) that the behaviour is unwelcomed or report the undesired behaviour to a supervisor.

Managers and Supervisors

Managers and supervisors are responsible for:

1. Leading by example to ensure our project is free of discrimination, harassment, workplace violence and/or threat of workplace violence;
2. Implementing or enforcing this standard or any policy created under this standard;
3. Ensuring that all employees they supervise have knowledge of and understand this standard or any policy created under this standard;
4. Ensuring the work environment they supervise is free from discrimination, harassment, workplace violence or the threat of workplace violence and is a respectful workplace; and
5. Taking or assisting in prompt and appropriate corrective action where necessary to ensure compliance with this standard or any policy created under this standard.

Contractor Responsibility

Contractors are responsible to:

- a) Have a Respectful Workplace Policy that meets or exceeds this Standard;
- b) Make inquiries to determine if the circumstances are such that an informal resolution of the complaint is a potential outcome, and if so to determine if the Complainant will consider attempting to resolve the matter through the Informal Complaint process;
- c) Document Informal Complaints and the resolution of Informal Complaints, and provide a copy of documentation to Nalcor Energy, no later twenty-four (24) hours after receipt;
- d) Upon receipt of a Formal Complaint, or being made aware of a complaint, the Contractor must determine the following:
 - i. if it is appropriate to separate the Complainant and the Respondent'
 - ii. have the Respondent off work on administrative leave pending the outcome of the investigation; or
 - iii. such other action the Contractor deems appropriate in the circumstances.
- e) Report in writing all Informal or Formal Complaints made under this Standard or policy created under this Standard, to Nalcor Energy immediately, including copies of all

statements and other documentation, and no later than twenty-four (24) hours after receipt;

- f) Complete investigation, or cause an investigation to be completed by an independent investigator and render a report within seven (7) days of receipt of the Formal Complaint, unless completing the report in this timeframe is not practical;
- g) Upon completion of the investigation report, advise Nalcor Energy in writing of the outcome of the Formal Complaint including any corrective action recommended and taken;
- h) Provide a copy of the investigation report to Nalcor Energy if requested; and
- i) Make available translation services that have been designated by Nalcor Energy for Labrador Innu that are interviewed or required to attend any meeting under this Standard or policy created under this Standard

Complaint Reporting and Informal Resolution

1. Informal Complaint Resolution Option

- a) If possible, tell the individual either verbally or in writing, that the behaviour is unwelcome and/or ask him/her to stop immediately following the incident;
- b) Report the incident to your immediate supervisor, or a manager or a member of

the human resources department (Labrador Innu workers have the option of reporting any incidents under this standard to the Innu Liaison Coordinator);

- c) The person making the complaint and the person the complaint is reported to shall keep a written record of the incident(s), including but not limited to date, time, location, witnesses, and what happened;
- d) Have consultation with your immediate supervisor, manager, member of the Human Resource Department or a third-party investigator engaged by the contractor to determine if the matter can be resolved as an Informal Complaint; and
- e) Where the complainant is not satisfied with the outcome of the informal process (as set out in (a), (b) (c) and (d)), or where an Informal Complaint is inappropriate, the complainant may choose to file a Formal Complaint against the Respondent.

2. Formal Complaint Reporting

- a) A Formal Complaint may be filed with any of the following:
 - Immediate supervisor;
 - Human resources and/or labour relations manager;

- Any manager of your Employer; or
 - Labrador Innu workers may file a complaint with the Innu Liaison Coordinator.
- b) The complaint should include:
- Name of alleged harasser(s); and
 - Details of alleged discrimination, harassment, workplace violence and/or threat of workplace violence (including dates, times, location, witnesses, circumstances surrounding the complaint, drawings or any other supporting documentation).
- c) The complaint should be made as soon as possible, as timeliness in filing the complaint protects the rights of the Complainant and Respondent;
- d) Nothing in this standard or policy under this standard, prohibits the individual their right to report the incident to the police or any other form of authority including the Newfoundland and Labrador Human Rights Commission; and
- e) The Complainant and Respondent will be made aware of the nature of the complaint and will be given an opportunity to respond as part of the investigation.

3. Reports of Violation of Respectful Workplace Standard by Witnesses

If you observe any incident of discrimination, harassment, workplace violence and/or threat of workplace violence, you are required to:

- a) If possible, tell the alleged harasser or person engaging in discriminatory or violent behaviour that the behaviour is inappropriate and ask him/her to stop;
- b) Keep a record of the incident(s) (date, time, location, witnesses, details of incident, etc.);
- c) Refer the victim of the incident to this standard or any policy of the victim's Employer created under this standard; and
- d) Report the incident to your supervisor, the human resources or labour relations manager, or any other manager of your employer.

Investigation Process

1. Within two (2) days upon receipt of a Formal Complaint, an impartial investigator shall be appointed by a senior management person or representative of the human resources department. Where appropriate, an independent investigator may be appointed to conduct the investigation.
2. The investigator will conduct a thorough and impartial investigation appropriate to the

- circumstances and collect evidence, question the involved parties, review documentation and interview witnesses.
3. The investigator will submit an investigation report within seven (7) days of being appointed, if practical, documenting the findings.
 4. A senior manager designated by the Contractor will, upon reviewing the report, determine the appropriate corrective action(s).
 5. In the case of an investigation report rendered by Nalcor Energy, a senior management person designated by Nalcor Energy will determine the appropriate corrective action(s).

When the disposition of the complaint has been decided, the Complainant and the Respondent are to be informed of the investigation findings and the action(s) taken to resolve the complaint. Where the resolution of the complaint requires disciplinary action against a union person, the union must be provided with a copy of any discipline notation.

Confidentiality

All parties involved in investigations of complaints of discrimination, harassment, workplace violence and/or threat of workplace violence will be treated with the strictest of confidence. Such complaints will be investigated

or resolved with the persons deemed necessary to carry out the investigation. The names of the individuals involved and the circumstances will only be divulged if necessary for the purposes of investigating the complaint, if required by law, or pursuant to Section 4.3 of this Standard

LCP Contractor Remedies under this Standard or Policy Created under this Standard

Appropriate action to be taken by a contractor against any employee found to have violated this standard or a policy created under this standard may include but is not limited to and not necessarily in the following order:

1. Written reprimand;
2. Attendance at Respectful Workplace Training;
3. Attendance at Cultural and/or Gender Sensitivity Training;
4. A suspension without pay;
5. A transfer if the persons involved cannot continue working together; and
6. Termination of employment.

Nalcor Energy Role and Remedies under this Standard

Nalcor Energy reserves the right, at its sole discretion, to review or change this standard at any time.

Nalcor Energy, at its sole discretion may in exceptional circumstances, investigate any complaint made under this standard to Nalcor or any complaint submitted to a Contractor under this standard or a policy created under this standard. Should Nalcor Energy conduct an investigation, such investigation does not replace any investigation being conducted by the contractor or relieve the contractor's obligation to comply with this standard or any policy created under this standard.

Nalcor Energy, upon receiving an Informal or Formal Complaint, completing an investigation or being notified of the outcome of an investigation or corrective actions, may:

1. Temporarily revoke site access;
2. Impose any conditions precedent to granting site access;
3. Permanently deny or revoke site access; or
4. Any other actions Nalcor Energy, in its absolute discretion, deems appropriate.

Frivolous Complaints or Retaliation for Making Complaints

Unsubstantiated/Unwarranted or Frivolous Complaints

Making a false complaint, frivolous complaint or a complaint in bad faith, or knowingly providing false information during a process established pursuant to this Standard or a policy created

under this Standard is prohibited and will result in discipline up to and including termination by the Contractor and may result in site access being revoked temporarily or permanently at Nalcor Energy's absolute discretion.

Retaliation

No one shall discipline, retaliate or take reprisal in any way against anyone who in good faith makes a complaint pursuant to this Standard or policy created under this Standard, or expresses a concern about discrimination, harassment, workplace violence and/or threat of workplace violence, or who has cooperated in an investigation pursuant to this Standard or policy created under this Standard.

Any retaliation against an individual who has made a bona fide complaint is strictly prohibited and any individual who engages in such conduct may be subject to discipline up to and including termination and may have their site access revoked temporarily or permanently at Nalcor Energy's absolute discretion.

Work Schedule

The work schedule for site shall be determined by the contractor in accordance with the Project Labour Agreement, where applicable. The scheduling of the number of days of work in a week, the number of shifts in a day and the

number of hours in a shift shall be at the discretion of the contractor in accordance with the applicable Project Labour Agreement. The work schedules for Innu employees will comply with the terms of the IBA, including flexibility in work schedules and rotation provisions to allow Innu to participate in traditional activities.

Privacy Policy

All contractors are to institute systems to protect the personal information of their employees as outlined in the Provincial Government's Access to Information and Protection of Privacy Act.

Labour Relations

Labour Relations

The LCP is committed to the creation of a positive project culture and terms and conditions of employment that differentiates the project. In partnership with the union all stakeholders will work together to support the Labour Relations Management Plan which provides the framework for achieving high levels of labour productivity, while fostering a respectful work environment, safety, quality, efficiency and respect for the environment. The focus is on fairness in the relationship between workers, contractors and union through open dialogue, equal treatment, consistent enforcement of rules and respect for each other's requirements.

In partnership with our unions, Project Labour Agreements have been negotiated that support a team based work environment. Adherence to the Project Labour Agreement is expected. This Handbook is not a part of the agreement and no grievances can arise out of this document. You are encouraged to discuss any work related problems or concerns with your supervisor.

Given the large number of employees who will be working on the Project, and to maintain the desired work environment, we have created work standards for site access and related day to day matters.

It is our expectation that contractors will have work rules that meet or exceed the standards listed below.

LCP Site Access

Nalcor, as the Owner, has the right to control access to any LCP site. As such, Nalcor, at its sole discretion, may grant or deny access to any LCP site.

Site Access Card

All personnel granted site access will be issued a picture ID card. All lost or misplaced ID cards must be reported to the Administration Office immediately. If a replacement card is required, there will be a charge for each replacement. When employees leave the site indefinitely or for extended periods (temporary layoffs) the supervisor must ensure that the employee's ID card is returned to the Administration Office. If an employee has forgotten or misplaced their ID card, the employee is required to sign in at Security.

Report to Work Standard

All personnel must sign in and out on a daily basis at the start and end of the shift, as well as any late start or early departure from the Project.

All personnel must arrive at work in a timely manner such that the employee is ready to go to work at the start of the shift. All personnel must leave work in a manner that reflects a time that is either on or after the conclusion of the work shift.

Personnel are not allowed to sign in or out for one another.

Attendance Standard

Personnel are accountable for their attendance and are expected to be at work on time every workday and to complete a full shift.

Absenteeism of three or more consecutive shifts without notification or a reasonable excuse will result in revocation of site access and termination of your employment by your employer, unless there are exceptional mitigating circumstances.

Personal Cell Phones/ Mobile Devices and Internet Usage

Personal cell phones or other mobile devices are not to be used on LCP work sites.

A recreational internet network will be available in the accommodations complex for use during non-work hours, appropriate restrictions will apply. Nalcor offices will have secure internet connection for business use only.

Use of Cameras

Digital Camera/Video Permits are to be issued to those required to collect photos for work related duties/purposes and can be revoked at any given time by the Project Delivery Team.

This policy applies to all project property locations, including the camp accommodations. Permits are required to be signed by the respective LCP Area Construction Manager or Site Manager and the approval signature for authorization must be obtained by Authorized Project Delivery Personnel. In accordance with the policy, project authorization can be granted by any of the following: Project Site HSSER Manager, Project Site HSSER Coordinator, Project Site Manager (or designate), Project Deputy Site Manager (or designate), Area Construction Manager (or designate).

The Digital/Camera Permit shall be made readily available for presentation to both Security and Project Delivery Team Personnel in order to control unauthorized usage.

Safety/Hazard potential in high risk areas must be taken into consideration while utilizing digital/video equipment on any LCP site.

A designated escort will be responsible for ensuring that digital equipment/camera

equipment is used in accordance with the reason the permit was brought on site.

A progressive disciplinary policy will be enforced upon those who fail to abide by the requirements of this Policy.

All visitors and new employees/contractors are advised of this policy requirement during site orientation. For visitors found violating this policy, it will constitute IMMEDIATE removal from the site. For employees, consultants, etc., a violation will result in a formal report to the supervisor and will be subject to the progressive site disciplinary policy.

Smoking

LCP has designated smoking areas for personnel who smoke. All personnel should check with their supervisor and watch the bulletin boards at their location for information on this policy. Whether you are a smoker or non-smoker, respect the rights of your coworkers. All personnel who smoke in non-designated areas may be subject to revocation of site access and discipline by your employer, up to and including termination.

Control of Firearms

Personnel are strictly prohibited from possession or use of firearms or other weapons on the site,

even when they possess a legal permit from a governmental body to carry such an item. Weapons may include, but are not limited to, handguns, knives (other than small, personal ones or those used as work tools), explosives and explosive devices and other instruments or materials that could cause harm to another employee, wildlife, or the public. Violation of this standard will result in the revocation of site access and termination of employment by your employer, unless there are exceptional mitigating circumstances.

Counseling and Progressive Discipline Standard

Counseling

Counseling is non-disciplinary and may be utilized by a supervisor when an employee does not meet the expected standard of performance or conduct established by the Contractor or for the Project. This non-disciplinary counseling is to ensure the employee is made aware of what is expected for a standard of performance or conduct and to give the employee the opportunity to modify the behavior. In addition, any counseling will make it clear that similar conduct or behavior may result in discipline up to and including termination.

Progressive Discipline

Progressive discipline may be utilized by a supervisor after an employee has received counseling and the conduct or behavior continues or when the severity of an incident warrants discipline in the first instance.

Discipline is normally carried out in progressive severity and is intended to correct behavior while acting as a deterrent.

The following is the typical sequence of progressive discipline:

Verbal Disciplinary Warning – to be recorded by a contractor and noted in the employee's personnel file; issued when the infraction is of a minor nature and is either the first occurrence of unacceptable behaviour or first occurrence after the employee has been counseled. The employee is to be provided a written confirmation of the verbal disciplinary warning.

Written Disciplinary Warning – issued where the first infraction is of a relatively minor nature. It may be a first occurrence of unacceptable behaviour or it may have been brought to the attention of the employee previously, through counseling or through a verbal disciplinary warning.

Suspension – issued when the infraction is of a serious nature, even though it may be the first occurrence;

The infraction is of a minor nature but is a continuation of unacceptable behavior, after a written and/or verbal disciplinary.

Termination – issued when the infraction is of such a serious nature that employment cannot continue;

The infraction is a final incident in a series of infractions that have been dealt with through one or more steps of progressive discipline.

Factors to Consider:

The steps of progressive discipline may be jumped or accelerated or delayed based on the following:

- Length of service;
- Past record;
- Severity of the infraction;
- Attitude of the employee;
- Previous corrective action record;
- Other mitigating factors, i.e., provocation.

Investigation – When a supervisor observes or is made aware of conduct or behavior of an employee that does not meet the accepted

standards of performance or conduct established for the project, the supervisor or a contractor/manager will:

- Conduct an initial investigation of the incident to gather all of the facts. The investigation may include an opportunity for the employee to provide the facts as the employee sees them. It should also provide an opportunity for the employee union representative, when requested to be involved;
- Innu employees will also have the access to support of the Innu Liaison Coordinator and other supports provided for in the IBA.

After the Contractor's supervisor has gathered information on the circumstances surrounding the infraction and reviewed the personnel file, the supervisor will communicate the level of discipline to the employee, including a copy of the written documentation.

LCP Site Work Rules

For all individuals working on the site, a basic set of rules have been developed to govern daily activities. While various rules are listed throughout the Handbook, particular attention should be paid to the violations listed below, which will lead to the denial or revocation of site access and termination of your employment by

your employer, unless there are exceptional mitigating circumstances.

The following list provides examples and is not exclusive:

- Violation of safety absolutes;
- Disregard for safety rules;
- Non-compliance with the Lower Churchill Project Drug and Alcohol standard, including but not limited to:
 - Reporting for work under the influence of alcohol or illegal drugs;
 - Possession of alcohol, illegal drugs or illegal drug paraphernalia;
 - Distribute, sell or attempt to sell drugs or illegal drug paraphernalia, or engage in unauthorized distribution, offering, or sale of prescription medication;
 - Refusing to submit to a requested just cause or post incident drug and alcohol test;
- Willful damage to equipment;
- Tampering with Safety Devices or Emergency Response Equipment;
- Working without a Construction Specific Permit. (Confined Space Entry, Excavation, Leading Edge/ Open Hole, etc.);
- Theft of property;
- Deliberate falsification of statement, reports or records;
- Failure to submit to requested searches

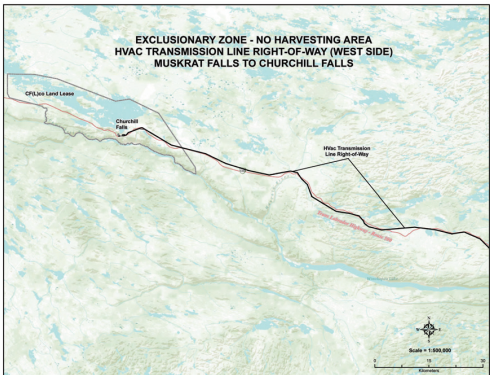
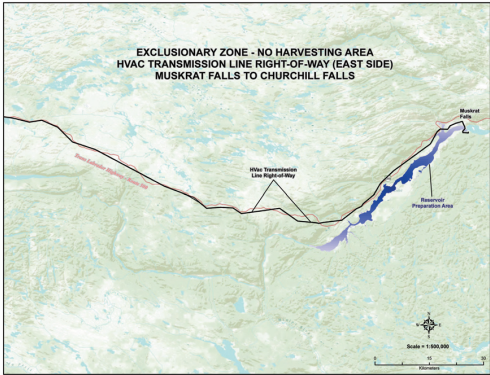
(vehicles, packages and/or personal baggage, including lunch boxes, entering or leaving the Site);

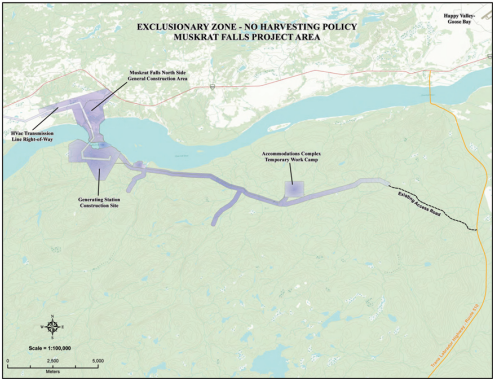
- Fighting or assault;
- Card swiping in or out for another individual and time card theft;
- Sleeping on the job during work hours;
- Possession of firearms, lethal weapons, ammunition or explosives on the site;
- Insubordination;
- Absenteeism of three (3) consecutive shifts without notification;
- Serious harassment, sexual or any other form.

The following are examples that may lead to revocation of site access and discipline by your employer up to and including termination:

- Hunting, fishing, trapping, collecting firewood or picking berries, whether on or off duty, at any time within the project area at any LCP work site and/or support infrastructure;
- Personal cell phones or other mobile devices, unless authorized;
- Abusive language, verbal threats, or intimidation of any employee;
- Failure to report job related injuries or illnesses.

11.0 Attachments







Harlequin Duck



Rusty blackbird



Osprey



Olive-sided flycatcher



Caribou



Night hawk



Grey-cheeked thrush

Acknowledgement Form

I have been provided with a copy of the LCP Site Handbook and understand that I am required to read the Handbook and am required to comply with the safety absolutes, rules and other requirements contained in the Handbook.

Signature: _____

Printed Name: _____

Date: _____

Office Location: _____

Signed original is to be retained by the Training Department.



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LOWER CHURCHILL PROJECT