

Distraction Avoidance Policy

1) Purpose

The purpose of this policy is designed to keep our employees, customers, and the public we work around each and every day safe from incident or injury.

2) Scope

The Policy and Procedure applies to all staff employed by the company or contractors performing any services for the company.

3) Objective

The objective of this policy is to prevent three main distractions:

- Visual: Taking your eyes off the task you are performing
- Manual: Taking your hands off the task you are performing
- Cognitive: Taking your mind off the task you are performing

4) Equipment Operators (Conveyor operators, equipment operators, truck drivers, service call technicians, operators of company-owned mobile equipment)

4.1 Always have your electronic devices turned off or stored well away from reach of operator while performing any company tasks. The only electronic devices approved to be in operation are OBC and mounted GPS and approved devices that never require operation while equipment is in motion.

***** Cell phones are not acceptable devices for GPS unless mounted and do not need to be touched to operate. As new devices/technology enter the market, pre-approval for use will be required from the company's VP of Safety and added to this policy.***

4.2 Never use handheld or Bluetooth communication devices while operating equipment or performing any task that requires any deviation from the 3 main distraction types listed below:

- Visual: Taking your eyes off the task you are performing
- Manual: Taking your hands off the task you are performing
- Cognitive: Taking your mind off the task you are performing

If in an emergency situation or you are responding to an emergency situation, hands-free/blue tooth is allowed on cell phone.

- 4.3** To prevent slips, trips and falls and to avoid being distracted in high traffic areas, walking and using electronic devices in traffic areas is prohibited. (Stop in safe area and take necessary calls, if required.)
- 4.4** Always avoid talking on a CB. Only talk if you are not in a high risk situation (no high traffic, weather and road conditions are clear, site activity is low risk). Always ensure your discussion is work related and as brief as possible (best practice is to discuss on CB while equipment is not in motion; always avoid walking and talking on portable communication device). The CB radio during winter road operations, dry bulk operations can be an integral part of our customer's operations. We can use the CB radio safely to complete the brief operational communications, always perform LMRA.
- 4.5** Always ensure prior to performing a company task that snacks and drinks are prepared and accessible without your mind or eyes leaving task. Make sure all gear is properly stowed and secured before performing a task; loose objects can become a distraction if having to brake quickly, or travelling on rough roads or equipment is being moved.
- 4.6** Avoid reaching for anything while equipment is in motion.
- 4.7** Never reach for anything with both arms while equipment is in motion.
- 4.8** Never have animals/pets or unauthorized individuals with you while performing a company task.
- 4.9** If you are a company-approved passenger/trainer, do not distract operator from the task at hand.
- 4.10** Never perform more than one task at a time unless you are sure there is zero risk of incident (avoid multi-tasking, not keeping your eyes and mind on task).
- 4.11** Never perform grooming activities while performing a company task.
- 4.12** Always step back and ensure zero distractions in work area; stop and take personal time if your mind is not focused on the task you are performing. LMRA (Last Minute Risk Assessment) should be performed before starting a task; if task changes, stop and perform a second LMRA.
- 4.13** Always avoid knowingly sending texts, or speaking on a phone with employees or contractors operating equipment or performing a task on duty. This can cause both parties to be in violation of this policy.

- 4.14 Provide family members with the RTL-Westcan emergency hotline number (1-855-573-8888) so that they can reach you through our emergency line in the event of a family emergency.
- 4.15 In some cases to help investigators in determination of root cause and prevention of future incidents, actively participate in investigation in to the alleged use of electronic devices. The RTL-Westcan Group of Companies Terminal Manager may ask for the opportunity to review your actual device for usage logs and in some cases, work with the company and or government officials to gain logs from your service provider with your permission.

5) Maintenance, Yard and Warehouse Employees:

- 5.1 Provide family members with the RTL-Westcan emergency hotline number (1-855-573-8888) so that they can reach you through our emergency line in the event of a family emergency.
- 5.2 In the event you need to respond with a communication device, only do so when safe and never multitask, i.e. never continue to perform another task at the same time as responding. Always avoid getting/making calls or reading/sending texts during work hours. Check phones/messages on your breaks or after work shift. Always leave communication devices away from your work area so they do not cause distractions.
- 5.3 Always step back and ensure zero distractions in the work area; stop and take personal time if your mind is not focused on the task you are performing. LMRA (Last Minute Risk Assessment) should be performed before starting or re-starting a task; if task changes, stop and perform a second LMRA.
- 5.4 Never have animals/pets or unauthorized individuals with you while performing a company task.
- 5.5 Always avoid knowingly sending texts, or speaking on a phone with employees or contractors operating equipment or performing a task on duty, as this can cause both parties to be in violation of this policy.
- 5.6 In some cases to help investigators in determination of root cause and prevention of future incidents, actively participate in investigation in to the alleged use of electronic devices. The RTL-Westcan Group of Companies Terminal Manager may ask for the opportunity to review your actual device for usage logs and in some cases, work with the company and or government officials to gain logs from your service provider with your permission.

- 5.7** Avoid performing more than one task at a time unless you are sure there is no risk of incident (avoid multi-tasking, not keeping your eyes and mind on task).

6) All Employees

6.1 In the event you need to respond with a communication device, only do so when safe and never multitask, i.e. continue to perform another task at the same time as responding. Always avoid getting/making calls or reading/sending texts during work hours. Check personal phones/messages on your breaks or after work shift. Always leave communication devices away from your work area so they do not cause distractions.

6.2 Always avoid knowingly sending texts, or speaking on a phone with employees or contractors operating equipment or performing a task on duty, as this can cause both parties to be in violation of this policy.

6.3 Provide family members with the RTL-Westcan emergency hotline number (1-855-573-8888) so that they can reach you through our emergency line in the event of a family emergency.

6.4 Always avoid making or receiving calls while on duty. In the event you need to make a call, never violate distracted driving laws.

6.5 To prevent slips, trips and falls and to avoid being distracted in high traffic areas, walking and using electronic devices in traffic areas is prohibited. (Stop in safe area and take necessary calls, if required).

6.6 Never have animals/pets or unauthorized individuals with you while performing a company task.

6.7 If you are a company-approved passenger, do not distract operator from the task at hand.

6.8 Avoid performing more than one task at a time unless you are sure there is zero risk of incident (avoid multi-tasking, not keeping your eyes and mind on task).

6.9 Always step back and ensure zero distractions in the work area; stop and take personal time if your mind is not focused on the task you are performing. LMRA (Last Minute Risk Assessment) should be performed before starting a task; if task changes, stop and perform a second LMRA.

6.10 In some cases to help investigators in determination of root cause and prevention of future incidents, actively participate in investigation in to the alleged use of electronic devices. The RTL-Westcan Group of Companies Terminal Manager may ask for the opportunity to review your actual device for usage logs and in some cases, work with the company and or government officials to gain logs from your service provider with your permission.

7) Exception

Exception to this policy will apply in the case of “Emergency Response Activity”. In emergency situations, employees must limit the violations of the policy whenever possible.

In some cases we may have to operate Equipment and you may have to also operate a communication device such as a computer. For example, when profiling ice, a LMRA will be performed at the start of each event that may violate this policy to ensure the safest plan has been put in place and the level of risk has been identified to your supervisor. Your Supervisor and the employee will approve your LMRA in digital or hand writing allowing approval of non-compliance of this policy.

When in a non-emergency situation, or approved variation, employees must continue to follow the policy at all times while performing any task for the company.

8) Discipline

Violation of this policy will follow the company culpability model.

Tips on Preventing Distractions

- Inform friends and family of your work schedule and share the risks of distractions with them
- Provide Westcan emergency number (1-855-573-8888) to family members so they can reach you in case of emergency
- Use your breaks to check and respond to messages
- Turn off electronic devices while performing a company task
- Have a daily plan or journey management plan so that you are prepared for weather, directions, food/snacks, break downs, fuel, work load, time and can remain focused on the task at hand
- Always perform a Last Minute Risk Assessment before starting new task or if task changes

- Work with your manager or supervisor on a plan that does not contravene this policy if you are expecting an urgent call/text (notification must be made prior to any violation)
- If you are not sure how to prevent a distraction, speak with safety or your manager
- Keep items that can cause distractions such a communication devices, loose objects, hanging objects, things stuck in windows, dashes and floors clean and free of debris and all properly stored to prevent distraction