



AGNICO EAGLE

MELIADINE GOLD PROJECT

SD 9-6

**Occupational Health and
Safety Plan**

**APRIL 2014
REVISION 3**

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DOCUMENT CONTROL

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EXECUTIVE SUMMARY

AEM believes that a safe and healthy workplace is a fundamental right for our employees. We are committed to protect the health and safety of our workers and to meet and, when possible, surpass legislated occupational health and safety standards. Management is committed to provide all resources necessary to prevent injuries and to maintain a healthy work environment. Our goal is an injury-free workplace for all of our employees. The Occupational Health and Safety Plan (OHSP) has been built focusing on accident prevention and risk management. To achieve these goals, AEM is committed to:

- Comply with all applicable safety laws and regulations;
- Promote the concept that all loss due to accidents/incidents is preventable;
- Encourage and expect safety leadership from all employees at all levels;
- Encourage a safety leadership that demonstrates personal commitment and accountability;
- Establish a workplace environment that is supportive of all employees accepting responsibility;
- Act responsibly in the process of managing workplace risks;
- Establish and implement proper health and safety systems and processes to manage and control workplace risks;
- Achieve safe production by applying proactively sound principles and practical policies/procedures;
- Design and operate facilities to ensure that effective controls are in place to mitigate health and safety risks;
- Minimize the generation of hazardous conditions and ensure controls are in place;
- Provide with adequate training for all employees, at all levels;
- Provide professional safety staff to plan and direct safety/risk management compliance programs and assist in training and educational activities; and
- Regularly audit safety/risk management performance and implement any required corrective action.

Safe work performance is the responsibility of every person in the workplace. Specific responsibilities of AEM employees in accordance with AEM's safety philosophy are listed in this plan.

In conformity with the *Canada Labour Code*, Part II, AEM will establish an Occupational Health and Safety Committee (OHSC) at the Meliadine Gold Project immediately upon initiation of construction activities. The OHSC will be composed of management and employee members (including contractor(s)). The general terms of reference for Committee operation, related training, and AEM's commitment to the effective functioning of the OHSC are outlined in this plan.

AEM included best safety practices in its Health and Safety Policy. To make sure all employees are aware of the health and safety rules, they will be explained at the initial induction/orientation

session. The AEM Safety Coordinator will conduct all health and safety orientations and briefings. The induction session will also include general information on accommodation, food/nutrition, alcohol/drug/smoking policies, and recreation. Details on these are provided in the Human Resources Plan (SD 9-4).

Documented work procedures and job hazard analyses will be used as guides for job training. AEM will ensure ongoing health and safety education programs and approved first aid training courses are provided. Certain employees, willing and designated by the OHSC, will be trained in mine rescue procedures and emergency evacuation applicable to the Meliadine operation. An Emergency Response Team (ERT) will also be put together.

AEM will develop appropriate work procedures for all activities through a process of Job Hazard Analysis (JHA). This will include procedures for the management of hazardous chemical, physical and biological agents/materials (e.g. manufacture, storage, use and disposal) which are better described in the Hazardous Materials Management Plan (SD 2-13) and Spill Contingency Plan (SD 2-16). Relevant health and safety information regarding hazardous materials will be communicated to the appropriate health centers and emergency response staff.

Many tools are already established in AEM's operations to control and measure the workplace health and safety performance. These will be implemented at the Meliadine Gold Project and will include, for examples: the use of Work Safety Cards, job observations, internal and external safety audits, equipment checks and inspections, noise and temperature surveys, gas monitoring, etc. Also, a hygiene monitoring program will be established. Personal Protective Equipment (PPE) will be available on site and mine safety equipment and devices will be maintained and ready at all times.

The *Mine Health and Safety Act* and regulations require that the Mine Manager establish and maintain a medical surveillance program and first aid facilities for employees. AEM will proactively comply with the Act and the regulations at the Meliadine Gold Project and will ensure that the all contractors and subcontractors at the mine site also comply. In the event of serious injury, it may be necessary to remove the individual from the source of the danger and to administer emergency first aid. The site Health Professional will be notified immediately in order to take charge of the situation and, if needed, appropriately interact with Nunavut's medical health system. More information related to emergencies is available in the Risk Management and Emergency Response Plan (SD 2-15).

ACRONYMS

AEM	Agnico Eagle Mines Limited
CCOHS	Canadian Centre for Occupational Health and Safety
CEO	Chief Executive Officer
ERT	Emergency Response Team
JHA	Job Hazard Analysis
MSDS	Material Safety Data Sheet
OHS	Occupational Health and Safety
OHSC	Occupational Health and Safety Committee
OHSP	Occupational Health and Safety Plan
PPE	Personal Protective Equipment
SD	Support Document
WCB	Workers' Compensation Board
WHMIS	Workplace Hazardous Materials Information System

SECTION 1 • INTRODUCTION

1.1 Overview

This plan has been prepared by Agnico Eagle Mines Limited (AEM) to address the requirements under the Nunavut *Safety Act* and *General Safety Regulations*, the Nunavut *Mine Health and Safety Act* and *Mine Health and Safety Regulations* and the *Canada Labour Code* applicable to workplace health and safety at the Meliadine Project. This same legislation applies to all mining developments in Nunavut. The Occupational Health and Safety Plan (OHSP) covers gold mining, processing, and related activities at the Meliadine site, and focuses on accident prevention and risk management. AEM will also ensure that the mining contractor's OHSPs meet both the legislative requirements and AEM's standards before any work begins at the Meliadine site.

Guiding the development of this document has been the principle that an effective and high-quality OHSP must provide:

- A clear chain of command for health and safety activities;
- Accountability for safety and health performance;
- Well-defined corporate expectations regarding safety and health;
- Well-defined operational/task hazards and risks;
- Comprehensive hazard prevention and control methods;
- Recordkeeping requirements to track program progress.

This plan is conceptual and will be updated before construction and on a regular basis. AEM has also developed a Risk Management and Emergency Response Plan (SD 2-15), a Spill Contingency Plan (SD 2-16), a Hazardous Materials Management Plan (SD 2-13) and a Noise Monitoring Plan (SD 5-2). These plans are submitted separately.

1.2 AEM Sustainable Development Policy

The keystones supporting AEM's Sustainable Development Policy are: Operate Safely, Protect the Environment, and treat our Employees and Communities with Respect. AEM is thus committed to safe production. We believe that all loss due to accidents/incidents is preventable. We aim to operate a safe and healthy work place that is injury and fatality free. We believe that if we all work together, we can achieve zero accidents in the work place and enhance the well-being of employees, contractors and communities. To achieve a safe and healthy workplace we:

- Use sound engineering principles in the design and operation of our facilities;
- Provide appropriate training for all employees, at all levels of exploration, development, construction and operations;
- Minimize the generation of hazardous conditions and ensure controls are in place;
- Maintain occupational health and industrial hygiene programs;

- Provide appropriate tools to carry out the work safely and efficiently;
- Maintain a high degree of emergency preparedness to effectively respond to emergencies.

AEM believes that the responsibility for the health and safety of people is one that is shared with and between each employee, our suppliers and the contractors that are on our sites. AEM believes that each person has a contribution to make to the health and safety of everyone in the workplace, and such contribution is expected by all.

1.3 AEM's Commitment to Health and Safety

AEM believes that a safe and healthy workplace is a fundamental right for our employees. We are committed to protect the health and safety of our workers and to meet and, when possible, surpass legislated occupational health and safety standards. Health and safety considerations will be paramount in all aspects of the Meliadine Gold Project, from design through construction, commissioning, start-up, and operations. Management is committed to provide all resources necessary to prevent injuries and to maintain a healthy work environment. Our goal is an injury-free workplace for all of our employees. In implementing this OHSP, we will set measurable performance targets and report our progress on a regular basis.

To this end:

- All relevant laws and regulations are incorporated in AEM's OHS programs as minimum standards;
- Senior management is responsible for making funds and other resources available to ensure the successful implementation of the OHSP and for hiring and training qualified personnel for all activities at the Meliadine Gold Project;
- All supervisors are responsible for ensuring that their employees are trained in approved work procedures to obtain optimal output without accidents and injuries, and that employees follow safe work methods and all related regulations;
- All employees are required to fully support the OHS programs, to make health and safety a part of their daily routine, and to ensure they are following safe work methods and relevant regulations. At the Meliadine Gold Project, mine safety will be everybody's business;
- Employee responsibility extends to fitness for duty. There will be zero tolerance for individuals who are unfit for duty in the workplace, whatever the reason;
- An Occupational Health and Safety Committee (OHSC), co-chaired by management and employee representatives and composed of salaried and hourly employees, will be established when mining commences at Meliadine;
- The OHSP will be reviewed annually, or more frequently as required, to evaluate its effectiveness and to ensure continual improvement. All employees will be encouraged to offer suggestions for ways to eliminate potential hazards and improve work procedures; and

- Through effective communication with all employees and recognition of good performance, we aim to foster individual commitment to safety and responsible attitudes, behaviour, and practices in the workplace.

1.4 Policy with Respect to Contractors and Visitors

Every person working at or visiting the Meliadine Gold Project site will be required to follow AEM's OHS policy and procedures.

A pre-hire assessment will be made for all contractors and subcontractors based on hurdles that eliminate companies with a poor safety record and give preference to the selection of "best-in-class" companies based on their safety performance. Major contractors, such as those for mining and hauling, will be required to have their own health and safety plans that meet legislative standards. This will be verified by AEM management prior to final engagement of the contractor.

The employees of smaller contractors or subcontractors will be given site and safety orientations before commencing work at the site for the first time. They will be notified of the Personal Protective Equipment (PPE) requirements and will be asked to supply their workers as needed. These orientations will be mandatory and will be facilitated by the Safety Coordinator.

All contractors will be signed in to the site and given a badge (if necessary). All visitors and consultants will be signed in to the site and given induction training upon arrival. Visitors to site will generally be escorted by a designated AEM employee at all times. Visitors will be specifically warned about necessary precautions with respect to any current blasting operations and the need to obey the instructions of mine personnel at all times.

1.5 Federal, Provincial and Territorial Regulations

AEM must be compliant with the applicable regulations within the jurisdictions in which it conducts work. For the Meliadine Gold Project, the key acts and regulations governing occupational health and safety are as follows:

Federal

- *Canada Labour Code, Part II*
 - *Canada Occupational Health and Safety Regulations*
- *Nuclear Safety and Control Act*
 - *General Nuclear Safety and Control Regulations*

Nunavut

- *Safety Act*
 - *General Safety Regulations*
 - *Work Site Hazardous Materials Information System Regulations*

- *Mine Health and Safety Act*
 - *Mine Health and Safety Regulations*

SECTION 2 • OCCUPATIONAL HEALTH AND SAFETY RESPONSIBILITIES

AEM is accountable for overall compliance with health and safety legislation and for providing a safe and healthy work environment at the Meliadine site. In turn, safe work performance is the responsibility of every person in the workplace, including all employees and all levels of management. To fulfill these responsibilities, every person must:

- Know what their responsibilities are;
- Have sufficient authority to carry them out;
- Have the required ability and competence (training or certification); and
- Clearly recognize that health and safety are an integral, full-time component of every job.

Specific responsibilities of AEM employees in accordance with AEM's safety philosophy are listed below. Legislated responsibilities of the mine owner, mine manager, and workers are outlined in Section 4 • Health and Safety Rules of this OHSP. PPE will be available on site to ensure preparedness of mine safety equipment and devices. They will be maintained and ready at all times.

Hourly Employees are responsible for:

- Knowing and complying with all regulations;
- Following safe work procedures;
- Using the required personal protection and safety equipment;
- Using the appropriate tools and equipment for the job;
- Keeping tools in good condition;
- Reporting any incidents, near misses, injury, or illness immediately;
- Reporting unsafe acts and unsafe conditions;
- Suggesting ways to eliminate hazards; and
- Cooperating with OHSC members and representatives.

Supervisors are responsible for:

- Enforcing health and safety regulations;
- Instructing workers about safe work practices;
- Ensuring that new and transferred employees receive detailed safety instruction before they are allowed to start work;
- Holding regular safety meetings to review safety conditions and general safety policies;
- Providing an example for others by always directing and performing work in a safe manner;
- Ensuring that only authorized, adequately trained workers operate equipment;
- Inspecting the work place regularly and taking remedial action to minimize or eliminate hazards;
- Ensuring that equipment is properly maintained;

- Correcting unsafe acts and unsafe conditions;
- Reporting and investigating all accidents/incidents;
- Arranging for medical treatment as required, including transportation to an appropriate medical facility; and
- Accompanying the government mines inspector during mine and process plant inspections.

Senior Executives/Managers are responsible for:

- Providing a safe and healthful workplace;
- Providing a statement of policy with regard to the OHS program;
- Establishing and maintaining a health and safety program;
- Maintaining overall control of the safety and loss prevention program;
- Ensuring that all established safety policies are administered and enforced in all areas;
- Ensuring that personal protective equipment is available;
- Ensuring that all workers are trained or certified, as required;
- Providing medical and first aid facilities;
- Providing ongoing health and safety education programs and approved first aid training courses, as required;
- Reporting accidents and cases of occupational disease to the appropriate authority;
- Supporting supervisors in their health and safety activities; and
- Evaluating the health and safety performance of supervisors.

Safety Coordinators/Superintendents are responsible for:

- Advising all employees on health and safety matters, including legal requirements and changes in legislation;
- Ensuring conformity to Industrial Hygiene programs and activities;
- Coordinating interdepartmental health and safety activities;
- Operating the health centre and providing nursing services on site;
- Attending to safety seminars and training;
- Collecting and analyzing health and safety statistics;
- Assisting in accident investigations and reporting;
- Preparing inspection reports and ensuring that all deficiencies are addressed;
- Conducting research on special problems; and
- Attending OHSC meetings as a resource person.

SECTION 3 • OCCUPATIONAL HEALTH AND SAFETY COMMITTEE

3.1 Legal Requirements

Under the *Canada Labour Code*, Part II, Sections 135 to 137, and the *Nunavut Mine Health and Safety Act* and associated regulations, a mining operation with more than fifteen (15) employees must establish an Occupational Health and Safety Committee (OHSC). Sections 11, 12, and 13 of the Act, and Part III of the Regulations, address the Committee requirements. Key items are as follows:

- The OHSC must consist of management members appointed by management and an equal or greater number of worker (hourly) members elected by hourly employees (at least four (4) members total for mines with 15 to 100 employees; at least eight (8) members total for mines with 100 to 250 employees). OHSC member names are to be posted at the mine and sent to the union local (if any) and the Chief Inspector of Mines.
- The OHSC must be co-chaired by an appointee from management and an hourly employee selected by the worker members; co-chairs alternate as meeting chairs.
- Worker OHSC members must be drawn from representative job classifications at the mine.
- Both worker and management OHSC members can serve on the Committee for a period of two (2) years and are eligible for re-election or re-appointment for subsequent two-year terms.
- OHSC member vacancies are to be filled by election or appointment, as appropriate, within 60 to 90 days (circumstances dependent) of the occurrence of the vacancy.
- Decisions of the OHSC are made by majority participation in the decision.
- The Mine Manager must enable OHSC members to participate in inspections, investigations, and meetings.
- The Mine Manager must ensure that OHSC members are paid their normal rate when attending to Committee business.
- The Mine Manager must ensure that OHSC members receive training relating to the functions of the Committee. A record of training must be kept.
- The Mine Manager must provide for a meeting place for the OHSC.
- OHSC members must make monthly inspections of work sites as deemed appropriate by the Committee. Meetings are to be held within forty-eight (48) hours of an inspection, and minutes of the meeting are to be kept for circulation to the Committee members.
- OHSC members must participate in accident investigations.

3.2 OHSC Establishment at Meliadine

AEM will establish an OHSC at the Meliadine Gold Project immediately upon initiation of construction activities. The OHSC will be composed of a minimum of eight (8) members drawn from AEM management and employees and those of the mining contractor(s). In this case, a minimum of four (4) AEM employees will form the OHSC for the process plant. The Safety Coordinator will attend

all OHSC meetings to act as a resource person and, at the discretion of the OHSC, may be invited to be a member.

General terms of reference for Committee operation, related training, and AEM's commitment to the effective functioning of the OHSC are outlined below.

3.3 OHSC Terms of Reference

The OHSC members will be active participants in the development, implementation, and monitoring of all phases of the OHSP. Special duties will include:

- Participating in the development and implementation of programs to protect employee health and safety;
- Making recommendations to management for accident prevention and safety program activities;
- Participating in all health and safety inquiries and investigations;
- Dealing with employee complaints and suggestions concerning health and safety;
- Participating in resolving workplace refusals and work stoppages related to health and safety;
- Monitoring and following up on hazard reports and recommending appropriate actions;
- Ensuring the maintenance and monitoring of injury and work hazard records;
- Setting up and promoting programs to improve employee training and education; and
- Monitoring the effectiveness of safety programs and procedures.

3.4 OHSC Training

AEM management will provide a training program for OHSC members. The program will include (but will not necessarily be limited to):

- Committee responsibilities and authority;
- Occupational health and safety regulations;
- Hazard recognition;
- Job safety analysis;
- Industrial hygiene;
- Methods of raising safety awareness;
- Inspections;
- Principles of accident causation;
- Accident investigation;
- Effective communication; and
- Cross-cultural awareness with respect to health and safety.

3.5 Assurance of OHSC Effectiveness

AEM is committed to the establishment and operation of an effective OHSC. To that end, the following checklist of items will be completed by the joint founding Committee and followed up in the health and safety audits:

- Members' duties will be clearly defined and provided in writing to all members.
- The founding Committee and auditors will canvass members to determine whether they understand their duties, and will take appropriate corrective action where necessary.
- The OHSC will continually evaluate how effectively members are carrying out their duties and take appropriate corrective action where necessary; auditors will review OHSC member effectiveness annually.
- The structure and duties of the OHSC will be reviewed by the Committee and auditors at least annually and revised as indicated in consultation with all stakeholders.
- Written statements of authority will be provided to each OHSC member, the co-chairs, and the secretary, and will be reviewed with each member for understanding by the founding Committee and by auditors annually. Authority issues will be reviewed periodically by the OHSC, as appropriate or necessary.
- OHSC performance will be evaluated by OHS auditors at least annually using the following indicators (or others to be determined by the OHSC):
 - Do workers know who members of the Committee are?
 - Are the duties and authority of members known to the workers?
 - Is the Committee seen by workers as being useful in providing leadership in safety?
 - Is the Committee seen by management as correctly meeting its responsibilities and authority?
 - Do line supervisors see members as facilitating worker/supervisor communication in safety?
 - Is the distinction between management and Committee responsibility for safety clearly understood by all employees?
 - Are members perceived as enforcers or advisors?
 - Do workers make suggestions to members?
 - Does management representation on the Committee reflect its strong commitment to safety?
 - Does management fully support Committee activities by providing comprehensive information, time, facilities, and training?
 - What proportion of members' time during paid work hours is spent on health and safety activities?
 - How many Committee recommendations have been implemented in the past year and in total since inception?
 - When a recommendation is not implemented, are the full reasons given to the Committee?

- Is the full record of Committee recommendations, their implementation, and reasons for non-implementation available to all workers?

SECTION 4 • HEALTH AND SAFETY RULES

This section sets out both AEM's policy and the minimum government requirements with respect to health and safety rules at the Meliadine Project site. It includes listings of the respective responsibilities of the mine owner, mine manager, and general employees as stated in the Nunavut *Mine Health and Safety Act* and its regulations. As discussed in Section 3 • Occupational Health and Safety Committee of this OHSP, the Act and the *Canada Labour Code* require that a mine with more than fifteen (15) employees establish an Occupational Health and Safety Committee co-chaired by management and an employee representative; AEM's proposed OHSC is described in Section 3 • Occupational Health and Safety Committee. In addition to the legislated duties and responsibilities outlined below, the OHSC will establish additional site-specific rules as required to promote a safe and healthy work environment at Meliadine.

4.1 AEM'S Health and Safety Policy

Compliance with health and safety rules is a condition of employment at the Meliadine Gold Project. This includes both AEM employees and contractor's employees. The health and safety rules and rationale will be explained at the initial orientation for all new employees or employees that transfer to another position. The AEM Safety Coordinator will conduct all health and safety orientations and briefings (updates). The interval for briefings will be decided by the OHSC in consultation with AEM management. To the extent possible, briefings will also be coordinated with the contractor's Safety Coordinator.

No violation of health and safety rules will be disregarded. Violations will initially be dealt with by an employee's supervisor and, at the discretion of the supervisor or manager, by the OHSC. Repeated breach of rules or repeated unsafe acts that endanger the safety or health of any individual on site will be grounds for disciplinary action, including dismissal. Coercion of other employees to break the rules will not be tolerated, and such action will be subject to disciplinary action, including dismissal.

4.2 Legislated Minimum Standards

The minimum health and safety standards for mining in Nunavut are set out in the *Mine Health and Safety Act* and associated regulations. Copies of this Act will be available to AEM employees upon request to the Safety Coordinator.

Duties and responsibilities of the mine owner are set out in Section 2(3) of the Act as follows:

The owner of a mine shall ensure that:

- Provision is made for such supervision, instruction and training as is necessary to protect the occupational health and safety of the employees;

- The mine is constructed, developed, reconstructed, altered or added to in accordance with the *Mine Health and Safety Act* and regulations;
- Machinery, equipment, material and protective devices that are required, by the regulations, to be used at the mine or available for the use of employees at the mine, are available for such use;
- Personal protective equipment required by the regulations to be provided to employees is so provided; and
- The mine is operated in accordance with this Act and the regulations.

The mine owner must appoint a Mine Manager and make this person known to the Workers' Compensation Board Chief Inspector. The Mine Manager will have prime responsibility for ensuring that the requirements of the Act and the regulations are met in the operation of the mine. Other duties and responsibilities of the Mine Manager are set out in Section 10(3) of the Act as follows:

The Mine Manager shall:

- Ensure that machinery, equipment, materials and protective devices required to be used at or available at the mine are maintained in good condition;
- Ensure that the personal protective equipment required to be provided to employees by the regulations is maintained in good condition;
- When appointing a supervisor or surveyor, appoint a person possessing the prescribed qualifications;
- Ensure that an employee is under the daily supervision of a person possessing the prescribed qualifications;
- Ensure that an employee receives the information, instruction and supervision necessary to protect his or her health and safety;
- Establish and maintain an occupational health and safety program as required under the regulations;
- Establish and maintain a medical surveillance program for employees as required under the regulations;
- Establish and maintain a mine rescue program as required under the regulations;
- Ensure that any order, directive, notice or other document that is required to be posted at a mine under this Act or regulations is maintained in a legible condition; and
- Where an owner is a corporation, send a copy of every order of an inspector and every order and directive of the Chief Inspector to the senior officer of the corporation designated under subsection 9(1) to review and consult with the Mine Manager in respect of such orders and directives.

The Mine Manager is also responsible for maintaining a register of all persons employed at the mine in a manner satisfactory to the Chief Inspector of Mines. Where mining is conducted by a contractor, duties of the Mine Manager extend to a contractor.

Duties and responsibilities of mine workers are set out in Section 17 of the Act. Under the Act, a worker has the right to refuse to perform any work or operate any machinery that he or she has reasonable cause to believe would endanger the health or safety of any person. The worker has the responsibility to bring the condition of concern to the attention of his or her supervisor as quickly as possible. It is the responsibility of the mine owner or contractor to resolve the refusal to work. An employee cannot be discriminated against for refusing to work under conditions that do not comply with the *Mine Health and Safety Act* and regulations.

A worker shall:

- Take every reasonable measure and precaution to protect the health and safety of employees and other persons at the mine; and
- Comply with the Act and the regulations and any orders and directives issued under the Act and the regulations.

SECTION 5 • INDUCTION AND ORIENTATION

5.1 Induction

Upon arrival on site of any new or transferred employee, contractor, visitor or student, an induction will be provided which will include but not be limited to:

- General visit of installations/accommodations (kitchen, first aid clinic, muster points and smoking areas);
- Presentation of conditions specific to the site (emergency evacuation, multicultural group, communications in English, waste management, clothing guidelines, weather conditions, working schedule and living arrangements);
- Site policies/procedures:
 - Radio communication;
 - Zero tolerance for drugs and alcohol;
 - Harassment;
 - Areas permitted for outside activities;
 - Wildlife reporting and adapted behavior;
 - Access road travelling guidelines and safety;
 - Best safety practices and safety awareness programs;
 - Rules of conduct for different areas of the site; and
 - Muster point locations and evacuation.

5.2 Employee Orientation

New employees to the mine, as well as those who transfer internally, will be provided with a job-specific health and safety orientation, which will include the results of the Job Hazard Analysis (JHA) for their specific position. No employee will start a new job until the supervisor or manager is satisfied that the employee is adequately trained for the tasks to be performed. Orientation sessions will cover, at a minimum:

- AEM's commitment to occupational health and safety;
- Function of the work unit;
- Cold weather safety precautions;
- Organizational relationships (how the various operating positions interrelate);
- Administrative arrangements (the employee's supervisor and the supervisor's manager);
- Policies and rules pertaining to the specific job and to the overall Meliadine operations;
- Work duties and safe work practices;
- Fire and other emergency procedures;
- Location of first aid or medical stations;

- Locations of fire extinguishers, eye wash stations, first aid kits, Workplace Hazardous Materials Information System (WHMIS), Right-to-Know stations (Material Safety Data Sheets – MSDSs);
- Health and safety responsibilities of the employee and the employer, including those specified by the *Mine Health and Safety Act* and regulations;
- Reasons for each health and safety rule;
- Right to refuse hazardous work, duty of the employee to report the situation, and duty of management to address the refusal;
- Hazards, including those outside the employee's own work area;
- Procedures for reporting accidents, injuries, unsafe conditions, and unsafe acts;
- Use of personal protective equipment;
- Work card, etc.

Because the Meliadine Project will be a mixed cultural environment, with personnel from both eastern and Inuit backgrounds, the orientation sessions will include a discussion on diversity awareness and the importance of creating a supportive working environment for all employees. Employees will be informed that racial discrimination by any employee will not be tolerated and will be grounds for disciplinary action, including dismissal.

A brochure or handout outlining the points covered in the orientation sessions will be provided to each employee.

New, inexperienced, or transferred employees will be encouraged to ask questions at any time if they have any doubts about the appropriate procedure to use for a task. The following checklist of items must be clearly understood:

- Hazards of the job;
- Availability of job safety training;
- Required safety equipment and reasons for the need;
- Required PPE, the available training in PPE use, and reasons for the need;
- How (and to whom) to report unsafe or unhealthy conditions;
- Who is responsible for safety-related questions; and
- What to do if an injury or accident occurs.

All new employees will be assessed by their supervisor or other manager, as appropriate, as to their understanding of the items discussed in the orientation session within approximately one week of the session. Assessments will be conducted in a helpful, non-threatening way and will not constitute a job evaluation. The reasons for the assessment will be explained to the employee, along with suggestions for additional study or training. The supervisor or manager will complete an assessment evaluation form that will not identify the employee or the position, but will be structured so as to evaluate the orientation process and its success in conveying essential health and safety information to new and transferred employees.

More information can be found on the workplace conditions such as accommodation, food/nutrition, health and safety, alcohol/drug/smoking policies, and recreation in the Human Resources Plan (SD 9-4).

SECTION 6 • TRAINING

6.1 Supervisory Personnel

Under the *Mine Health and Safety Act* and regulations, all supervisors at a mining operation must be certified. All supervisory personnel at the Meliadine Gold Project will require, as a condition of employment, certification under the Act.

6.2 Employees

As a minimum, all employees will receive an initial job orientation (see Section 5.2 Employee Orientation).

Documented work procedures and JHAs will be used as training guides for job training. On-the-job training will, at a minimum, consist of:

- Steps in carrying out the job and each task involved in the job;
- All the hazards associated with the job and the required PPE;
- Where to obtain PPE and health and safety information; and
- Where to obtain information about any aspect of the job.

Each step of the job will be demonstrated, stressing key points. The employee will then be led through the job procedure. The employee's supervisor will conduct initial frequent checks to ensure that the employee is following appropriate and safe procedures.

Certain employees, willing and designated by the OHSC, will be trained in mine rescue procedures applicable to the Meliadine operations. Employees hired initially with appropriate mine rescue training will be designated as the mine rescue team at the commencement of mining. Training of the mine rescue team will include emergency evacuation appropriate to the Meliadine operations.

6.3 Occupational Health and Safety Committee

In accordance with the Act, AEM management will ensure that training relevant to the work of the OHSC is provided at least twice a year. A record of training will be kept and will be made available to mine inspectors. AEM will proactively comply with the provisions of the Act and will ensure that its mining contractor(s) comply as well. Training for the OHSC will include procedures and processes required for routine workplace health and safety inspections and for accident investigations. These areas were presented in previous Section 3 • Occupational Health and Safety Committee.

SECTION 7 • WORK PROCEDURES

7.1 Elaboration of Work Procedures

Appropriate work procedures ensure the safest way of doing a job. They are elaborated based on job instruction, monitoring performance, and accident investigation. AEM will develop appropriate work procedures for all activities through a process of JHA. In this analysis, each task of a specific job will be examined to identify hazards and determine the safest way to perform the work. The work procedures will include:

- Identification of concerned departments/individuals;
- Equipment requirement;
- PPE requirement;
- Risks identification: hazardous chemical, physical and biological agents/materials;
- Storage, use and disposal of hazardous chemical, physical and biological agents/materials (as indicated by manufacturer); and
- Icons for quick identification and visual perception.

AEM will use the procedures set out by the Canadian Centre for Occupational Health and Safety (CCOHS) as a guide for the JHA. In summary, the analysis will consist of four (4) main steps:

- Select the job;
- Divide the job into sequential steps;
- Identify the hazards; and
- Define preventive measures.

Critical tasks or jobs, such as those with the potential for causing severe injuries or that entail infrequently performed tasks (e.g., maintenance), will be addressed as a first priority. The JHA will be carried out by observing employees on the job. Members of the OHSC will participate. Employees will be briefed as to the reasons for the observation, emphasizing that the objective is to examine the task, not the employee. Where applicable, reference will be made to safety rules and regulations and to the PPE required, if any. Employees will be asked for their suggestions and assistance in these analyses.

All contractors on site will need to work according to AEM procedures.

AEM believes that if work procedures are followed, accidents and occupational illnesses should be prevented. Substandard health and safety performance at any level will not be tolerated and is not acceptable. AEM believes in and is committed to continual improvement.

7.2 Communication of Procedures

All procedures will be presented to employees at the safety meetings. When approved, all procedures will be made available to everyone on site. Current version of these procedures, including revisions or corrections, will be accessible at all time from IT system.

Also, relevant health and safety information regarding hazardous materials will be communicated to the appropriate health centers and any emergency response staff.

SECTION 8 • WORKPLACE MONITORING AND CONTROL

8.1 Workplace Specific Item

The final OHSP will provide additional details on procedures and requirements related to workplace specific items. These will include (but not be limited to):

- Workplace Hazardous Materials Information System (WHMIS) training and the location of Material Safety Data Sheets (MSDSs);
- Electrical lockout procedures, including general information for all employees and specific procedures for employees requiring them;
- Job-specific materials handling rules;
- Job-specific training for personnel handling materials that could pose a health or safety risk;
- General information on ammonium nitrate and explosives handling for all employees working in areas where explosives are used (all personnel handling explosives will be licensed, without exception);
- Job-specific training and orientation for safe operation and maintenance of plant equipment and of mobile equipment such as trucks, shovels, and front-end loaders;
- Job-specific personal protective equipment requirements;
- Fire guards and the location of firefighting equipment, including fire extinguishers;
- Vehicle safety rules, including speed limits and other considerations;
- Guidelines for working alone;
- Identification of specific permanent monitoring (ex: gas monitor, radiation monitor, etc.) in each areas;
- For employees requiring it, orientation on engineering standards in use at the mine;
- For employees requiring it, the purchasing standards policy of AEM and the mining contractors;
- For all employees, orientation on preventative maintenance and its value;
- For employees requiring it, job-related training in preventative maintenance (e.g., mobile equipment operators); and
- For all employees, orientation in on off-the-job safety.

In addition, employees will be provided with details of the Risk Management and Emergency Response Plan (SD 2-15), the Spill Contingency Plan (SD 2-16), and the Hazardous Materials Management Plan (SD 2-13).

8.2 Workplace Monitoring and Control

AEM has many tools established in its operations to control and measure OHS performance. Here are some examples:

- Use of Work Safety Card;

- Job observations;
- Internal safety audits;
- External safety audits;
- Pre-use equipment checks;
- Equipment inspections;
- Noise surveys;
- Surveys of extreme temperature;
- Gas monitoring, etc.

Also, a hygiene monitoring program will be established. This program will be supported by the Health and Safety Department.

SECTION 9 • WORKPLACE INSPECTIONS

9.1 Legal Requirements

Workplace inspections are intended to identify existing or potential hazards and to recommend appropriate corrective action. The *Mine Health and Safety Act* and regulations set out requirements for workplace inspections by mine management, the OHSC, and mine inspectors. Management must ensure that procedures are in place for the examination of:

- The condition of access routes, haulage roads, and travelways;
- The suitability and safety of work practices;
- The general condition of equipment, tools, and protective equipment and devices;
- The use of protective equipment and devices;
- The condition of refuge stations;
- The adequacy of ventilation;
- The presence of hazardous gases and toxic fumes;
- Emergency arrangements, including safe means of egress; and
- Provisions to ensure that work procedures are being properly followed.

The Act mandates the monthly inspection of as many work sites as the OHSC considers necessary. AEM will comply with the provisions of the Act and regulations in a proactive manner. Management and employees, through the OHSC, will evaluate previous accidents and the potential for serious accidents and injuries in assigning inspection frequencies beyond those mandated in the Act.

9.2 Inspection Team Members

OHSC members will ordinarily carry out inspections. At the discretion of the Committee, additional personnel may be added to the inspection team. Criteria for the selection of the inspection team will include (but not necessarily be limited to) the following:

- Knowledge of the *Mine Health and Safety Act* and regulations and company policies and procedures;
- Familiarity with the hazards and with the standards, regulations, personal protective equipment, and procedures that apply to the area to be inspected;
- Experience with the work processes involved in the inspection;
- Knowledge of previous injuries and illnesses in the workplace or conditions at similar operations;
- Ability and skills to assess situations requiring corrective action (job hazard recognition);
- Training in inspection and in handling personnel and situations;
- Knowledge of the organization's operations, work flow, systems, and products; and
- Proper attitudes and influence to bring about improvements.

9.3 Purpose of Workplace Inspections

The purpose of workplace inspections will be to:

- Listen to concerns of workers and supervisors;
- Gain further understanding of jobs and tasks;
- Identify existing and potential hazards;
- Determine the underlying causes of hazards;
- Monitor hazard controls; and
- Recommend corrective action.

9.4 Inspection Planning and Procedures

Prior to an inspection, the inspection team will consult and review relevant documents, including notes from previous inspections. Where practical and indicated, the team members will use inspection checklists to help ensure that items are not overlooked. The OHSC will develop customized checklists adapted to each workplace and to the conditions at Meliadine.

During inspections, both work conditions and procedures will be observed. If required, preventative actions will be instituted immediately. Inspection notes will include details of hazards, including exact locations, and hazards will be classified either at the site or in a follow-up meeting. Recommendations for action, such as engineering controls, management actions, and worker re-education, will be included in the inspection report.

9.5 Potential Workplace Hazards

Potential workplace hazards relevant to the Meliadine Gold Project could notably include:

- Safety hazards related to inadequate machine guards, improper use of air hoses, improperly functioning PPE, poor housekeeping practices, unsafe electrical cords/outlets, improperly functioning fire protection equipment, careless storage of flammable materials, and other unacceptable workplace conditions and practices;
- Chemical hazards caused by solids, liquids, vapours, dust, fumes, mist, etc.;
- Ergonomic hazards caused by anatomical, physiological, and psychological demands on the worker, such as repetitive and forceful movements, vibration, extreme temperature, and awkward postures arising from improper work methods and improperly designed tools and equipment;
- Biological agents and materials; and
- Physical hazards caused by noise, vibration, energy, blasting, and heat and cold extremes.

Safety and management procedures or programs related to these hazards will be put in place. These procedures or programs could include many items as: storage, adequate PPE, monitoring schedule, etc.

9.6 Inspection Scheduling

An overall inspection schedule will be developed by the OHSC in consultation with management. The schedule will take into account inspection intervals for each area within the workplace, the designated team members and their responsibilities for the inspection, and the degree of details required to inspect each area.

The frequency of inspections will be based on:

- The number and size of different work operations;
- The type of equipment and work processes in each work area;
- The number of operating shifts per day; and
- The introduction of any new processes or machinery.

9.7 Follow-up Meetings

Following the inspection, the OHSC will meet to evaluate and discuss inspection results. Minutes of the meeting will be forwarded to management and to the Chief Inspector of Mines. Minutes will also be posted for the information of employees.

9.8 Reporting

Reports will include (but not necessarily be limited to):

- Department or area inspected;
- Date of inspection;
- Names and titles/positions of the inspection team members;
- Unfinished items from previous reports;
- Observed unsafe conditions;
- Hazard classification of the condition:
 - Major – requiring immediate attention;
 - Serious – requiring short-term action;
 - Minor – requiring long-term action; and
- Recommended methods of control.

9.9 Follow-up Monitoring

Follow-up monitoring will be the joint responsibility of the OHSC and management and will consist of the following:

- Reviewing the information obtained from regular inspections to identify where immediate corrective action is needed;
- Identifying trends and obtaining timely feedback;
- Analyzing inspection reports to identify:

- Priorities for corrective action;
- Need for improving safe work practices;
- Insight about why accidents are occurring in particular areas;
- Need for training in certain areas; and
- Areas and equipment that require more in-depth hazard analysis.

9.10 Hazard Reporting by Employees

All employees will be informed during initial job orientation of their requirement under the Act and regulations to report hazards immediately to their supervisor. Employees will be expected to report hazards as they are noticed rather than waiting for workplace health and safety inspections to bring unsafe conditions or procedures to the attention of management and fellow workers.

SECTION 10 • REPORTING AND INVESTIGATING ACCIDENTS

The *Mine Health and Safety Act* and regulations outline procedures that must be followed in the event of an accident, as well as the duties of the Mine Manager and of the Workers' Compensation Board (WCB) mines inspectors. AEM will proactively comply with all provisions of the Act and regulations.

It is AEM's policy to investigate all accidents and incidents, including "near misses". The purpose of the investigation is to identify measures that can be taken to prevent a recurrence of similar events. After causes have been determined, prompt follow-up action is required to achieve the purpose of the investigation.

The following standard steps will be followed in accident/incident investigation:

- Provide first aid and medical care to the injured person(s);
- Identify the cause(s);
- Prepare a report on the findings;
- Develop a plan for corrective action;
- Implement the plan;
- Evaluate the effectiveness of the corrective actions; and
- Incorporate changes for continuous improvement.

AEM's final OHSP will specify the following:

- What is to be reported;
- To whom it is to be reported;
- How it will be reported;
- Which incidents will be investigated;
- Who will investigate them;
- What forms are to be used;
- What training the accident investigators will receive;
- What records will be kept (legal and company policy requirements);
- What summaries and statistics are to be developed and whose responsibilities these are; and
- How often reports are to be prepared.

Detailed accident/incident investigation procedures are to be developed by AEM for its exploration activities. These procedures will be reviewed at an early opportunity by the OHSC shortly after it is formed, but no later than six (6) months after mine construction commences.

SECTION 11 • EMERGENCY RESPONSE

11.1 Emergency Response Plan (ERP)

AEM has developed a Risk Management and Emergency Response Plan (SD 2-15) to comply with the NIRB's guideline for Environmental Impact Statement of its Meliadine Project. The updated Emergency Response Plan (see SD 2-15) will be filled out prior to Project's construction to complete the details regarding emergencies such as fires, explosions, major release of hazardous materials, violent occurrences, or natural hazards. The plan will conform to the requirements set out in the *Mine Health and Safety Act* and regulations, and will include at least the following:

- A list of potential hazards;
- Possible major consequences of each;
- Required countermeasures;
- Inventory of resources needed to carry out the planned actions; and
- Provision for establishing the necessary emergency organization and procedures.

Communication, training, and periodic drills will ensure that all employees perform as required when emergency procedures must be implemented.

The ERP will be completed in cooperation with AEM's mining contractor and will cover both the mining and processing operations at the Meliadine Project; the OHSC will be a key participant in that process.

A Spill Contingency Plan (SD 2-16) was also put together and will be reviewed prior to construction.

In the event of serious injury, it may be necessary to remove the individual from the source of the danger and to administer emergency first aid. The on-site Health Professional will be notified immediately in order to take charge of the situation and, if needed, appropriately interact with Nunavut's medical health system. Procedures for emergency incidence reporting and actions including procedures for medical transport of injured staff or persons are available in the Risk Management and Emergency Response Plan (SD 2-15).

11.2 Emergency Response Team (ERT)

An Emergency Response Team (ERT) will be put together. Site employees will receive special training to assist in emergencies. The Mine Manager, in consultation with the Health and Safety Department, will select qualified candidates in sufficient numbers to facilitate the response programs required by the plan.

The ERT will receive the special training required for adequate response to on-site emergencies. Some of the emergencies the team may respond to include:

- Emergencies involving injuries and fatalities;
- Evacuations;
- Fires and/or explosions;
- Spills or other accidental releases; and
- Search and rescue.

SECTION 12 • MEDICAL AND FIRST AID

The *Mine Health and Safety Act* and regulations require that the Mine Manager establish and maintain a medical surveillance program and first aid facilities for employees. AEM will proactively comply with the Act and the regulations at the Meliadine Gold Project and will ensure that the all contractors and subcontractors at the mine site also comply. Specifically:

- A first aid or nursing station (Health Center) that conforms to the requirements set out in the regulations will be established at a convenient location at the mine site;
- A Health Professional (first aid attendant or nurse) of appropriate qualifications will be hired or contracted;
- A medical surveillance program will be established by the Health Center personnel to follow personal health on a regular basis (as example: ears survey, blood survey, annual exam, etc.);
- First aid equipment, supplies, and facilities will be kept clean, dry, and ready for use;
- First aid equipment and supplies will be established at refuge stations, the mill, and other locations as required in the regulations;
- First aid equipment and supplies will be inspected weekly and replenished or replaced, as required;
- All employees will be made aware of the location of first aid facilities and how to call for first aid assistance;
- Signs indicating how to call and the location of first aid facilities will be posted throughout the mine site;
- Effective means of communication will be established between the Health Center and all work areas to be served;
- Effective means of communication will be established to allow the person in charge of the first aid facility to summon additional aid. This will likely be a satellite phone for external communication and a site phone or radio, as appropriate, for mine communication; and
- Supervisors and employees will have first aid training, as required by the regulations.

When an injury has occurred at work which may result in lost time beyond the day of the accident, it must be reported to the WCB. If the accident disables or is likely to disable the worker for more than the day of the accident, AEM will give notice of the accident to the WCB within 72 hours of knowledge of the accident. A notice will also be provided to the injured worker.

A policy on return to work after lost-time accidents will be established in consultation with health representative to ensure internal consistencies between mining and processing operations at the Meliadine site. The following guidelines will be used in developing the policy:

- Productive, suitable work will be offered to the employee.

- The worker's physician will be consulted and must agree that employment will not harm the worker or slow down his or her recovery;
- No work will be offered that, if done by the worker in question, will pose a threat to other workers' health and safety; and
- As far as practical, the policy will be applied to off-the-job injuries as well as those suffered on-the-job.

12.1 Medical and First Aid Operations

AEM intends to construct at Meliadine an on-site medical facility similar to the one at the Meadowbank Gold Mine as the level of care required at the two mines are expected to be similar. Experience at Meadowbank will provide a good indication for what level of medical service Meliadine will draw on in Rankin Inlet.

The Meliadine Project will have the appropriate staff and an emergency medical centre designed to handle the following types of care:

- **Emergency advanced first aid response** will be supplied in the event of injury resulting from both on the job and off the job accidents. The objective would be to provide advanced first aid/treatment for minor injuries that would safely allow a patient to continue working at the site for the remainder of their rotation without further medical attention. For more serious injuries, the objective would be to stabilize the patient so that they can be transported safely to a more advanced medical or hospital setting for the required kind of care. In the most serious cases, this would likely result in a medical evacuation to a hospital setting such as in Winnipeg. For less serious injuries, this would likely result in the transport of the injured patient back to their community of origin using the Company's arranged employee charter flights for further medical care in their home community. This applies equally to both southern and Nunavut-based employees.
- **Basic care** will be supplied for minor ailments incurred by any employee, contractor employee or visitor during their time at the Meliadine site. The objective would be to treat minor employee ailments on site so that this employee can complete their work rotation. For more serious ailments, where the illness is likely to extend beyond one or two days of bed rest, or where spread of illness is a risk, AEM would likely arrange for the transport of the injured patient back to their community of origin using the Company's arranged employee charter flights for further medical care in their home community. This applies equally to both southern and Nunavut-based employees.

During the construction and operational phases of the proposed Meliadine Project, it is AEM's plan that it will employ a full time registered nurse and/or advanced Para-medical on each work rotation so that at all times there is at least two medical professionals (nurse or medic) available on site to

provide emergency medical care. The nurse/medic would be based at the site medical centre and would be scheduled to work a set schedule of hours on a seven-day per week basis. The medics will also be on call on a 24-hour per day basis for serious injury or illness. The medics will work on the two week in – two week off rotational work schedule. The site will have an emergency communication system so that the medic can be contacted at any time should their services be needed in the event of a medical emergency. This communication system will include site-based two-way radios and phone contact. The site will have both landlines and cell phone service. At its Meadowbank Mine, AEM entered into a contract with Qikiqtaaluk Medical (<http://qmedical.ca/>) to provide additional medical support in the event the on-site nurse/medic require further assistance. This includes phone access to a physician on a 24/7 basis by the site nurse/medic for consultation/advice, when required. AEM intends to create a similar arrangement at its proposed Meliadine site once construction commences.

The site medical clinic will be set up to accommodate two patients at any given time and will be supplied with the necessary equipment to help address advanced first aid needs and to stabilize patients for transfer to a hospital setting for serious injuries/accidents. On-site health professionals will mainly do first aid interventions. Protocols will be put in place to cover a wide range of different medications that a medic and/or a nurse can administer on site for multiple types of illnesses and injuries. The site will have access to a defibrillator for urgent care; however, the site medical facility will not have access to X-ray equipment or other types of diagnostic equipment.

AEM will on occasion have to draw on medical aid from the Government of Nunavut health care facility in Rankin Inlet. For example, for major injury (e.g., dislocation, broken bone, etc.), patients would be stabilized at the site medical clinic, then transported to the Rankin Inlet Health Center for further assessment/stabilization before being transported to a Winnipeg hospital.

SECTION 13 • OHSP IMPLEMENTATION AND PROMOTION

AEM recognizes the importance of management commitment to the OHSP at all levels, from the Chief Executive Officer (CEO) to managers and employees at all levels. All personnel will be accountable for their individual performance with respect to health and safety on the job. Specific management actions taken in consultation with the OHSC will include:

- Providing sufficient time, money, and personnel for implementation and promotion of the OHSP;
- Ensuring that employees receive training or certification as required;
- Setting realistic goals and monitoring progress toward these goals;
- Distributing all pertinent information regarding job health and safety and related matters;
- Including health and safety performance as part of employee performance appraisals at all levels;
- Ensuring management attendance at OHSC meetings;
- Developing a system of individual recognition for superior performance, such as safety awards that recognize achievement;
- Designing a communication system, such as a tally board placed in a prominent location, to provide a daily accounting of the number of accident-free days worked in the current period; and
- Providing active support for general meetings on health and safety, briefings by supervisors where indicated, and one-on-one coaching.

SECTION 14 • PLAN EVALUATION AND CONTINUOUS IMPROVEMENT

Consistent with guidelines for ISO-14000 environmental management systems, AEM will conduct an annual in-house occupational health and safety audit to evaluate the effectiveness of the OHSP. Periodically, as indicated and approved by senior management, an external organization will be contracted to conduct a check OHS audit. The AEM staff who conducts the in-house audits will work closely with external auditors to ensure a thorough review of health and safety issues.

The audits will verify compliance with laws and regulations and conformance with corporate guidelines, policies, and procedures. Regular safety auditing will also serve to maintain worker health and safety consciousness at a consistent level and assure employees that management strongly supports the workplace health and safety programs.

An auditing protocol will be designed once the mine plan has been finalized and prior to the end of the first year of commercial production. To ensure that the audit adequately covers all health and safety aspects at the Meliadine Gold Project, AEM will consult as necessary with its major contractors to complete the protocol.

Procedures will be established for follow-up on both in-house and external audits, including target dates for remedial actions and follow-up checks.