Introduction

Robert Gibson, a line manager in the logistics department, is pensive as he sits in his office after a meeting with a longstanding employee. Earlier that day, he had received a telephone call from Joseph Stevens, a team leader in one of the operations departments. Joseph had witnessed one of Robert’s employees driving unsafely on the public roadways and at a railway crossing on his way into work that morning. He was concerned that such behaviour could easily have led to a serious accident, not only to the driver, but also to members of the public on the roadways.

The employee, Jeff Michaels, was a delivery driver who had been with Dofasco for 22 years. His job responsibilities included delivering the spare parts and tools used by maintenance personnel who repair and maintain plant equipment. During the meeting with Robert, Jeff was asked to explain his recollection of the incident. Jeff explained that on that morning, the spare part being delivered was urgently needed to repair a backup control module. Because of the urgency of the request, and because he had two prior orders to deliver elsewhere, Jeff drove above the speed limit. Jeff arrived at an activated railroad crossing on a public road near the plant. He came to a stop behind a car already waiting at the barriers, looked up and down the track to confirm that the way was clear, and then drove the delivery truck around the railroad crossing barriers to get to the other side (See Exhibit 1).

During the meeting, the following discussion took place:

Robert: Tell me Jeff, why did you take such a potentially dangerous risk on the public roads?
Jeff: I felt I was doing my job in the way the company expects. I know how much they [the maintenance people] needed the parts to keep the equipment working. I felt the risk was worth it, as I didn’t want to let them down.
Robert: Are you saying you chose to ignore the potential danger and the Health and Safety Program, because people were relying on you?
Jeff: Well, I felt the risk was pretty low. Besides, I looked on both sides of the crossing and there was no train in sight.

* This case study was written by Karlene Harry (PhD Candidate), Dr. Catherine Connelly, and Dr. Isik U. Zeytinoglu. The case is intended as a basis for generating class discussion, rather than to illustrate or evaluate occupational health and safety management practices. Funding for this work was provided by Minerva Canada. Copyright © 2006 Michael G. DeGroote School of Business, McMaster University, Hamilton, Ontario, Canada and Minerva Canada Safety Management Education Inc.
Robert: I don’t understand. Why did you think that was acceptable?

Jeff: Honestly, I’ve done it before and I know that other people [i.e., employees] do this all the time. Why should I wait there while on company time, and hold up both the repair work and the guys on the [production] lines?

As Robert ended the meeting, Jeff had pointed at a framed certificate on the far wall, and said, “I may have taken a risk, but it wasn't out of line with that.”

The plaque read, “Do it Right the First Time, Every Time, At the Lowest Cost and Shortest Cycle Time, With No One Getting Injured.”

Dofasco Company Background

Dofasco, as it is now known, was established as Dominion Steel Casting Co. in 1912 by C.W. Sherman. It originally made castings for Canadian railroads. In 1917, Dominion Steel Casting Co. merged with Hamilton Steel Wheel Company to form Dominion Foundries and Steel Co. Ltd. One year later, the first universal steel plate mill in Canada was started. Dofasco made Canadian manufacturing history in 1938 when it introduced profit sharing to its employees. Today, employees have an equal share of 14 per cent of the pretax profit from the core Hamilton operations (See Exhibit 2).

Today, Dofasco is one of Canada’s largest steel maker and one of North America’s most profitable steel makers. With its head office and main operational facilities in Hamilton, Ontario, Dofasco is a non-unionized employer, with around 7000 employees. It is considered one of Canada’s best employers. Dofasco attributes its business success to its talented and committed workforce, its continued investment in research, development, state-of-the-art technology, and superior customer service and support.

To maintain a leadership position within the North American steel industry, Dofasco uses “triple bottom line” approach to maintaining sustainability and competitiveness: financial performance, environmental responsibility, and social well-being. The company also embraces the widely accepted definition of sustainability: "the ability to meet the needs of the present without compromising the ability of the future generations to meet their needs."

The Hamilton, Ontario plant produces various steel-based products, including hot rolled, cold rolled, galvanized, tin-plated, chromium-coated and pre-painted flat rolled steels, as well as tubular products and laminates. Most of these products are sold to the construction, automotive, steel-distributing, appliance and packaging industries.

Dofasco also owns manufacturing facilities in the United States and Mexico, and iron ore interests in Canada. Gallatin Steel is a joint venture operation in
Kentucky, producing hot rolled steel. Dofasco Marion, Dofasco de Mexico, and Powerlasers are all wholly-owned subsidiaries of Dofasco Inc. Both Dofasco Marion and Dofasco de Mexico produce various tubular products out of Marion, Ohio and Monterrey, Mexico, respectively. Powerlasers manufactures laser-welded automotive blanks and other components in Pioneer, Ohio and Concord, Ontario, and also has an Advanced Technology Centre in Kitchener, Ontario. In October 2005, Dofasco completed the acquisition of several tube manufacturing facilities, formerly owned by Copperweld. With this acquisition, Dofasco’s tube manufacturing processes have quadrupled.

More recently, in early 2006, Arcelor, one of world’s largest steelmakers with headquarters in Luxemburg, acquired all of Dofasco’s common shares. The company plans for Dofasco to be the hub of its North American growth strategy. Arcelor has 94,000 employees in over 60 countries. The company has centered its long-term business strategy on sustainable development, economic performance, labour relations and corporate social responsibility.

The Steel-Making Industry

The steel-making industry is critical to the North American economy. Steel is the raw material used in numerous transportation, construction, manufacturing, and consumer products. Steel is also the most recycled material, with roughly two-thirds of North American steel now produced from scrap.

In Canada, the Canadian steel industry plays a significant role in supporting the national economy. Strategically, steel serves to bridge Canada’s resource-based industries and a diverse assortment of value-added manufacturing activities. The strength of this domestic industry is demonstrated by the following facts:

- Over 35,000 people are directly employed within the steel industry. This figure does not include contractors, part-timers or student employees.
- In terms of productivity gains, the steel industry continues to lead all other Canadian industries. For example, between 1993 and 1999, the steel industry grew in productivity by an average of 14% per year, versus the gains of roughly 3.2% in the rest of the manufacturing sector.
- Canada's steel producers have more than 10,000 suppliers throughout Canada, and spend approximately 85% of revenues - one of the highest spend ratios of any major industry.
- Canada's steel producers lead North America in profits per ton.

Similarly, in the United States, the steel industry and its downstream processes is a $70+ billion venture, accounting for nearly 10% of the entire global market of raw steel production. Within recent years, the North American steel industry has faced intensifying international competition, due to the influx of sizeable quantities of low-cost imports. To improve production yields, labour productivity
and overall efficiency, companies have turned to implementing new technologies, transforming production processes, restructuring, consolidating, and downsizing to remain competitive.

**Operational Processes**

Dofasco’s operations hub is its 730-acre steelmaking complex in Hamilton, Ontario, Canada - one of the most efficient, flexible and technologically advanced steel plants in North America. The state-of-the-art Hamilton plant includes two blast furnaces, a basic oxygen steelmaking furnace, an electric arc steelmaking furnace, a hot mill, cold mills, galvanizing lines, and Canada's only electrolytic tinning line (See Exhibit 3).

Dofasco’s operational processes are numerous, interdependent and in many cases, simultaneous. It uses a hybrid planning & scheduling system to automatically control, coordinate, track and integrate major steps during the manufacturing process. The scheduling system gives the necessary feedback, flexibility and quick response in order to meet production and/or maintenance requirements, and customer expectations.

Over the last two decades, many workplaces with complex, capital-intensive processes have undergone tremendous transformation. These changes have been prompted, in part, by pressures to maintain or restore international competitiveness, adopt new technologies, and improve product quality. In response to these pressures, Dofasco created a new growth strategy in the 1990s, coined **Solutions in Steel™**, to differentiate itself from the rest of the steel industry. It focused on developing high value-added markets and products, through new product development, state-of-the-art technology adoption, and innovation. The **Solutions in Steel™** strategy led to the development of new customer relationships, and also helped to create sustainable performance throughout the business cycle.

In addition, the company made huge gains through its operational excellence initiatives in the following areas:

- Productivity
- Customer Service
- Cycle Time / Delivery
- Capability and Reliability
- Quality and Yield
- Cost Reduction

These strategies have transformed Dofasco, and enabled future growth and sustained competitiveness.
As other manufacturers have done, Dofasco has adopted several practices to enable process transformation. One such practice is the adoption of a just-in-time (JIT) inventory control. This is a demand-based production approach, where only a small amount of inventory, such as production inputs, equipment or other supplies, is kept on hand. Supplies are generally ordered only when additional items are needed. In general, supporters of JIT production systems believe that such systems enable higher productivity gains and a more effective response to fluctuating market demand. Critics of this type of workplace practice, however, suggest that much of these gains come at the cost of work intensification and speed-up, employee stress, and potentially worsened employee health and safety practices.

Health and Safety at Dofasco

Health and Safety is deeply embedded within Dofasco’s core values, which state, “Nothing is more important than the health and safety of our people”. This value is echoed in the Health and Safety Policy (See Exhibit 4), and throughout the Health and Safety Manual (See Exhibit 5). The Health and Safety management system requirements meet or exceed the requirements of Ontario’s Occupational Health and Safety Act and other applicable regulations.

Dofasco has been recognized as a leader in the health and safety arena, and recently received the 2002 Healthy Workplace Award from the National Quality Institute, in recognition of the company’s commitment to continuous improvement in employee health, safety and well-being, both within and outside the workplace. The award recognizes Canadian organizations that make employee health and well-being an integral and strategic part of the way they do business. Organizations considered for a Healthy Workplace Award are judged based on the Canadian Healthy Workplace Criteria developed by the National Quality Institute in partnership with Health Canada and health and wellness professionals.

Companies that understand the relevant Health and Safety needs, set organizational goals and proactively manage health and wellness programs are good candidates for such awards. To senior management, the 2002 Healthy Workplace Award is a tribute to the ongoing efforts of Dofasco people to make the company a healthy and productive place to work (See Exhibit 6).

Roadway Safety in Ontario

In 1999, more than 860 people were killed, and over 84,000 were injured while traveling on Ontario roads. The social and economic costs of these collisions have been previously estimated at $9 billion annually. The Ontario Ministry of Transportation suggests that driver error is one of the most common causes of
roadway collisions, including behaviour such as failing to yield right of way, failure to obey road signs and signals, following too closely, speeding, and improper turns and lane changes.

There were 248 railway crossing collisions across Canada in 2003. These accidents resulted in a total of 26 fatalities and 51 serious injuries. Passenger trains travel at speeds of up to 160 km/h and freight trains can reach 105 km/h. It can take a train more than one minute to come to a complete stop. For example, in perfect weather, an 88 car freight train weighing 13,000 tonnes and travelling 96 km/h would cover about two kilometres before stopping.

All railway crossings on public roads in Ontario are marked with large red and white ‘X’ signs. Drivers are required to watch for these signs and be prepared to stop. Some railway crossings have flashing signal lights, while others use gates or barriers to keep drivers from crossing the tracks when a train is passing. At a railway crossing where the signal lights are flashing, drivers are required to stop at least five metres from the nearest rail. Drivers must not cross until the signals stop flashing. If the crossing has a gate or barrier, drivers must wait until it rises or opens before crossing. It is dangerous and illegal to drive around, under or through a railway gate or barrier while it is being opened or closed. Ontario drivers can be fined $110 upon conviction for failing to stop at a railway crossing, and can receive three demerit points on their driving record, according to the *Highway Traffic Act*.

**The Current Situation**

Robert Gibson reviewed the company’s health and safety manual (See Exhibit 7). Robert also re-read the position description for the driver/operator job. As he did, he noticed that the section on working conditions and risk did not seem to provide details on the potential risk of harm to members of the public. Dofasco has strong ties to the Hamilton and surrounding community, donating millions of dollars and thousands of volunteer hours to improving community wellbeing. Any accident causing injury to people within these communities, if caused by employee recklessness on or off the job, would certainly be in conflict with ongoing commitments. It is for this reason that Robert was especially concerned that Jeff’s risk-taking behaviour may extend beyond his work responsibilities. He decided to review the last performance review report in Jeff’s employee file.

Robert Gibson’s thoughts also passed to the recent announcement that Dofasco was again listed on the Dow Jones Sustainability World Index, the sixth consecutive time since the launch of the Index in 1999. Companies listed on this index are considered by Dow Jones to achieve their business goals through the integration of economic, environmental, and social growth opportunities into their core business strategies. Sustainability-driven organizations like Dofasco consider all three areas simultaneously, to develop holistic strategies that enable
positive outcomes for all stakeholders. They pursue these opportunities in a proactive, cost-effective and responsible manner, to outpace their competitors. From a social perspective, Robert knew that any risks or harm to public safety caused by the unsafe employee behaviours, would be detrimental to Dofasco’s broader goals of sustainable development.

Conclusions: Addressing the Reported Behaviour

Robert Gibson contemplated how to proceed. The last employee found to have violated a traffic-related Health and Safety rule was suspended by management for four days. That employee had admitted to moving barrier tape out of an area, in order to get to work on time. The tape was legitimately placed in the laneway by Dofasco Trade Specialists, who were completing repairs on overhead equipment.

This situation was more complex. The employee certainly owned some of the responsibility, though he believed he acted in a way that supported the company’s business goals. Robert could relate somewhat to Jeff’s explanation, and believed that Jeff’s unsafe actions were influenced by several personal, job-related, organizational, and environmental factors.

Now Robert had to conduct an accident investigation and decide which factors he would consider, in determining the best way to address the reported behaviour. Who was really at fault here? Was punishing the employee appropriate? What management system issues need to be addressed? What steps, if any, should Robert Gibson take? What role can the Health and Safety department play here? What role can the Human Resources department play here?
References


Ontario e-Laws: *Highway Traffic Act* website, [http://www.e-laws.gov.on.ca/DBLaws/Statutes/English/90h08_e.htm](http://www.e-laws.gov.on.ca/DBLaws/Statutes/English/90h08_e.htm)

Ontario e-Laws: *Occupational Health and Safety Act* website, [http://www.e-laws.gov.on.ca/DBLaws/Statutes/English/90o01_e.htm](http://www.e-laws.gov.on.ca/DBLaws/Statutes/English/90o01_e.htm)


The Canadian Steel Producers Association, [http://www.canadiansteel.ca/industry/index.html](http://www.canadiansteel.ca/industry/index.html).

Exhibit 1

Figure 1 – Re-enactment of the Driver Conduct

![Diagram of railroad crossing and truck paths]
Exhibit 2

**DOFASCO**

### Table 1 – 2004 Consolidated Statements of Income and Retained Earnings

for the years ended December 31 (in millions except per share amounts)

<table>
<thead>
<tr>
<th></th>
<th>2004</th>
<th>2003†</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Income</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Net sales</td>
<td>$4,224.9</td>
<td>$3,954.9</td>
</tr>
<tr>
<td>Cost of sales (before the following item)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employees’ profit sharing (note 15)</td>
<td>61.5</td>
<td>32.9</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>3,388.7</td>
<td>2,996.3</td>
</tr>
<tr>
<td>Gross income</td>
<td>856.2</td>
<td>553.6</td>
</tr>
<tr>
<td>Depreciation and amortization</td>
<td>235.8</td>
<td>251.8</td>
</tr>
<tr>
<td><strong>Operating income</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interest on long-term debt</td>
<td>39.3</td>
<td>48.6</td>
</tr>
<tr>
<td>Investment and other income</td>
<td>(10.5)</td>
<td>6.0</td>
</tr>
<tr>
<td>Foreign exchange loss</td>
<td>5.9</td>
<td>32.4</td>
</tr>
<tr>
<td>Loss on disposal of GCM (note 6)</td>
<td>–</td>
<td>27.9</td>
</tr>
<tr>
<td><strong>Income before income taxes</strong></td>
<td>565.7</td>
<td>204.0</td>
</tr>
<tr>
<td><strong>Income tax expense (note 14)</strong></td>
<td>183.7</td>
<td>85.3</td>
</tr>
<tr>
<td>Minority interest</td>
<td>382.0</td>
<td>118.7</td>
</tr>
<tr>
<td><strong>Net Income</strong></td>
<td>117.7</td>
<td></td>
</tr>
</tbody>
</table>

| **Earnings per common share (note 11)**      |         |       |
| Basic                                          | $4.92   | $1.55 |
| Diluted                                        | $4.90   | $1.55 |

| **Dividends declared per common share**       |         |       |
|                                               | $1.26   | $1.26 |

| **Retained earnings**                         |         |       |
| Opening balance as previously reported        | $1,081.1| $1,053.0|
| Accounting change (note 2)                     | (8.9)   | (6.2) |
| Opening balance as restated                    | 1,072.2 | 1,046.7|
| **Net Income**                                 | 376.9   | 117.7 |
| **Premium on redemption of preferred shares (note 10)** | (0.1) | – |
| **Ending balance**                             | 1,449.0 | 1,163.4|

See accompanying notes to consolidated financial statements

† Restated (see note 2)
Exhibit 3

DOFASCO

How Steel is Made

Raw Materials
Most of Dofasco's raw materials, including iron ore and coal, arrive at our Hamilton docks by ship. Recycled steel is shipped to Dofasco by rail and truck.

Coke Production
Coal is converted to “coke” in Dofasco’s coke ovens. Impurities are removed and sold as by-products. The remaining pure carbon or “coke” is used in the blast furnace.

Iron Production
The 3 blast furnaces are used to make molten iron from iron ore. The coke in the blast furnace acts as the main source of energy along with oil, while limestone is used to remove impurities.

Molten Iron
Special insulated rail cars are used to transport the molten iron to one of the two steelmaking facilities where it is mixed with recycled steel and other alloys to make new steel.

By-Products
A number of by-products such as slag, light oils, ammonia, iron oxides and coal tars are captured during the coke and ironmaking processes and sold. These by-products are used as raw materials to make aggregates for road pavement, cements, fertilizers, plastics, electronics, and roofing compounds.

Steel Slabs
Steel slabs produced by Slab Casters are up to 30 feet long and weigh an average of 20 tons.

No. 1 Slab Caster
At the No. 1 two-strand Continuous Slab Caster the molten steel is poured into the casting machine which produces up to 2.65 million tons of solid steel slabs each year.

No. 1 Ladle Metallurgy
The molten steel is further refined at our No. 1 Ladle Metallurgy Facility where chemistry and temperature are finely adjusted before casting into a solid slab of steel.

Basic Oxygen Steelmaking
70% iron and 30% recycled steel are mixed with other alloys in the 300-ton basic oxygen steelmaking furnace to create the exact metallurgical qualities which suit customers’ end use requirements.

Recycled Steel
Recycled steel is an essential raw material for both the basic oxygen and electric arc furnace steelmaking processes. Steel Slabs The slabs begin to cool immediately after production, requiring reheating before further processing.

No. 2 Slab Caster
The No. 2 Slab Caster, linked with the Electric Arc Furnace, produces up to 1.35 million tons of steel slabs each year which are rolled at the Hot Strip Mill.

Dofasco Inc.
No. 2 Ladle Metallurgy
The No. 2 Ladle Metallurgy Facility refines the steel produced by the EAF to exact specifications which meet our customers’ needs.

Electric Arc Steelmaking
The Electric Arc Furnace uses from 70 to 100% recycled steel as its raw material. Dofasco has the flexibility to add molten iron to increase quality or as a substitute, when availability of recycled steel is low.

Reheat Furnaces
All of the cast slabs produced at Dofasco are reheated to about 1200°C in one of two reheat furnaces to ensure uniform temperatures prior to rolling into strip.

Rougher Mill
The 30-foot long slabs are reduced from 8 1/2 inches to less than 2 inches after 5 passes in the “roughing mill” as an intermediate step before rolling to exact thickness in the finishing mill.

Finishing Stands
The 2 inch thick steel strip now extends about 120 feet in length and is sent to the 7-stand finishing mill where it is further reduced to a range of thickness from .059 inches to .5 inches.

Tin Mill Products
The cold rolled steel can also be plated with tin for use in packaging. Dofasco is the only Canadian supplier of tinplated steel to the food packaging industry.

Tempering and Annealing
The cold rolled steel can also be tempered to give it greater hardness, or annealed to provide formability before it is sold.

Cold Rolled Products
Cold Rolling reduces the steel to exact thickness and flatness requirements. This product can be sold for use in a wide range of applications in the construction, automotive, appliance and manufacturing industries.

Pickling
The first step is to “pickle” the steel before further processing. There are four pickle lines where the strip of steel is run through hydrochloric acid to remove surface scale before cold rolling.

Hot Rolled Products
The strip of hot rolled steel is wound into a coil. This steel is sold to customers for processing into steel products for automobiles, pipes, tubing and construction. Most of the hot rolled steel is sent for further processing or coating at Dofasco for use in various other applications.

Galvanized Products
A zinc coating is added at one of our four galvanizing lines in Hamilton. Galvanized steel is used in products where its corrosion-resistant qualities are desirable. The strength, durability, recyclability, and relative low cost of steel assure its wide use and continued benefits long into the future.

Recyclability
Steel is 100% recyclable and can be recycled infinitely without ever affecting its strength or durability.

Protecting the Environment
Energy
Energy conservation is a major focus at Dofasco. The chemical reactions and high temperatures needed to make steel require a great deal of energy. Even small percentage improvements in our energy efficiency have significant benefits for the environment. One way we save energy is to capture gases from our Coke Ovens and Blast Furnaces, clean and then re-burn them as fuel in other processes around the Company.

Air
The best available pollution control technology is used to clean dust-laden gases before discharge to the environment. Preventive programs to reduce dust from open areas include the use of greenbelting, dust suppressants, fencing and regular sweeping of roadways.

Water
Approximately 90% of the water used comes into contact with operational processes and is treated and reused over and over again. Much of the water taken from Hamilton Harbour is for indirect cooling without contacting any pollutants. This water is returned to the harbour after use. The Electric Arc Furnace uses dry gas cleaning, which doesn’t require the use of water or treatment of effluents.

Society
Society’s understanding of environmental issues has evolved over the last thirty years from a basic concern for pollution, to a broad range of sustainability issues such as how we conserve non-renewable resources and use fuels more efficiently. Today, society’s environmental needs are reflected in the design of our customers’ products as well as Dofasco’s steels... Steel builds a better world.

Dofasco People
Environmental performance is a critical part of the job for many Dofasco employees. Careful attention during the operation and maintenance of our equipment makes a significant contribution to continuously improving performance indicators such as energy use, and particulate releases to air or water.

For information call: 1-800-DOFASCO
DOFASCO

Health and Safety Manual:
Health and Safety Policy

At Dofasco, nothing is more important than the health and safety of our people. We are committed to:

- Integrating health and safety practices into all aspects of our work. We will continue to incorporate these practices into product and process design, manufacturing and business planning;
- Providing innovative and preventive health and safety programs. We will continually optimize the effectiveness and integrity of our programs through open communications, comprehensive training and education, audits and workplace assessments;
- Developing understanding among those in leadership of their responsibilities and their accountability to provide a safe and healthful workplace;
- Developing understanding among all employees of their personal responsibility to work safely, their accountability for individual performance and the assignment of appropriate authority to implement these responsibilities, and;
- Meeting or exceeding the requirements of applicable legislation and regulations for performance in health and safety matters. Dofasco will demonstrate leadership within our industry.
Exhibit 5

**DOFASCO**

**Figure 2 - Health and Safety Council Committee Structure**

Diagram showing the structure of the Health and Safety Council Committee, including:
- Health and Safety Council
- Third Party Health and Safety Management Committee
- Dofasco Health and Safety Committee
- Improvement Projects
- Combustion & Instrumentation Standards Committee
- Lifting & Structures Committee
- Pre-Start Health and Safety Review Committee
- Confined Space Entry Committee
- Electrical Standards Committee
- Purge Committee
- Lifestyle Resource Group
Exhibit 6

DOFASCO

Examples of Health and Safety Activities:

- $15 million invested annually in employee training and development.
- Confidential access to a wide range of supportive Employee Assistance Programs for employees and families for issues related to: family, marital, financial, bereavement, substance abuse, anger management, eating disorders, smoking cessation, elder/child care and stress management.
- A Health and Safety Department, comprised of a multi-disciplinary team with expertise in safety systems, ergonomics and occupational hygiene, who provide technical support to the entire company.
- One full-time Health and Safety facilitator assigned to each Dofasco Manufacturing business unit to work with managers and employees in continually improving Health and Safety performance.
- Health and Safety performance is one of the factors that determine compensation, through a Variable Compensation payout component of all employees' compensation.
- An Open Door Policy allows every employee to effectively raise and resolve any workplace concerns and complaints.
- The Dofasco Health and Safety Committee is comprised of 11 employees with formal responsibility for promoting and recommending ways to maintain a safe and healthy workplace.
- A proactive, grassroots and volunteer-driven lifestyle and wellness program that is fully supported by senior leadership.
- A company-wide Health and Safety Fair that is held in the spring. The 9th annual Fair in 2005 attracted more than 3,600 employees and featured 85 displays and interactive exhibits.
- Three on-site fitness facilities that are open 24 hours a day, seven days a week for all employees. All employees using the facilities also receive a free initial fitness assessment.
Exhibit 7

**DOFASCO**

**Health and Safety Manual: Motor Vehicles and Heavy Equipment Directives**

- Only competent and authorized personnel are allowed to operate motor vehicles. All persons operating mobile equipment must possess a valid driver’s license specific to the equipment they are operating;
- All relevant government regulation must be adhered to while operating vehicles during fieldwork.
- Vehicles must be checked prior to operating to ensure they are safe to operate. Any problems must be reported and corrected.
- Loads must be securely fastened before transporting.
- Transporting personnel in the box or in the deck of a truck is prohibited.
- All Dofasco roadway rules and roadway signs must be adhered to at all times.
- Employees must not use restricted roadways unless approved by Dofasco.
- Vehicles must not be parked within 2 meters (6 feet) of railway tracks. Cross only at designated crossings.
- Employees must be aware or and alert to all traffic inside and outside of buildings (e.g. overhead cranes, transporters, slag carriers, etc.) Allow the right of way. Do not walk or drive under suspended loads.
- There is a 4 kilometre speed limit inside all buildings.
- Vehicles ignitions must be shut off and the parking brakes engaged when parked.