



**2025 HEALTH & SAFETY
PROGRAM AND PROCEDURES**



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Health & Safety Policy & Program Procedure	Issue Date: January 17, 2016	
	Revision Date: January 27, 2025	
Policy Number: HSMS 1-01	Revision Number: 009	
	 <i>Approved By: President</i>	

POLICY STATEMENT

The goal of the Health & Safety Policy & Program Procedure is to ensure that both our Policy & Program are kept current. This Procedure will ensure that KING complies with the requirements of the Occupational Health & Safety Act (OHSA) and all other applicable legislation, standards, and guidelines.

SCOPE

This procedure applies to Senior Management and all members of the Joint Health & Safety Committee that will complete the annual review and any necessary updates to the policy and program.

RESPONSIBILITIES

Senior Management will:


- Review the Health & Safety Policy and Program annually to ensure it is kept current. Upon review and approval, each policy, procedure, and practice will be signed off by the company President.
- Make any necessary changes to meet all regulations.
- The Health & Safety Policy will be signed annually by the company President.
- Ensure that the current Health & Safety Policy is posted on all job sites and on office Health & Safety Boards
- Ensure that all employees receive a copy of the Health & Safety Policy and Program and that they are trained on any changes and/or additions that were made to meet regulations.
- Allocate appropriate resources, training, and employees to implement and maintain the Health & Safety Policy and Program

JHSC will:

- Work jointly with Senior Management and the safety department to revise and update policies, practices, and procedures.
- Review the Health & Safety Policy and Program annually to ensure it is kept current.
- Make any necessary changes to meet all regulations.

Health & Safety Department will:

- Review the Health & Safety Policy and Program annually to ensure it is kept current.
- Make any necessary changes to meet all regulations.
- Ensure that the current Health & Safety Policy is posted on all job sites and on office Health & Safety Boards
- Ensure that all employees receive a copy of the Health & Safety Policy and Program and that they are trained on any changes and/or additions that were made to meet regulations.

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TRAINING

All applicable Senior Management, members of the JHSC, and the Health & Safety department will be kept current on all legislative changes and any applicable training required for the ongoing maintenance of this procedure.

COMMUNICATION


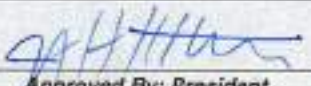
This procedure will be communicated to all applicable Senior Management, members of the Joint Health & Safety Committee, and the Health & Safety Department. In addition, new policies, practices and procedures or ones that have been revised will be communicated through toolbox talks throughout the year.

EVALUATION AND CONTINUOUS IMPROVEMENT

This procedure will be evaluated on an on-going basis and reviewed annually by Senior Management and the JHSC. The amended procedure shall be kept as a record or review and the required changes.

The revision of this document shall be tracked on the bottom of the procedure and recorded on the document maintenance tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy	OHSA Regulation New Standard	Jan 31, 2016	000
Update responsibilities	Annual Review	Jan 31, 2017	001
Updated format & responsibilities	Annual Review	Jan 10, 2018	002
Updated policy	Annual Review	Jan 4, 2019	003
Update policy	Annual Review	Feb 13, 2020	004
Update policy	Annual Review	Jan 11, 2021	005
Update policy Expanded Senior Management Responsibilities and JHSC responsibilities	Annual Review	Jan 10, 2022	006
Review Policy	Annual Review	Jan 04, 2023	007
Review Policy	Annual Review	Jan 08, 2024	008
Reworded Policy Statement	Annual Review	Jan 27, 2025	009

Health & Safety Policy Statement	Issue Date: January 31, 2017	
	Revision Date: January 27, 2025	
Policy Number: HSMS 1-02	Revision Number: 011	
	 Approved By: President	

The Senior Management Team at King Paving & Construction Ltd. is fully committed to the health and safety of its workers and all individuals involved in its projects. This includes a commitment for senior management to set & review OHS objectives & continual improvement of the OHSMS and OHS performance. Senior management is committed to providing a safe & healthy work environment for the prevention of injuries and illnesses. King Paving & Construction Ltd. is committed to continuous improvement towards an incident-free workplace. This commitment will be achieved through compliance with applicable OHS, legal and other requirements.

The Senior Management Team at KING promises that every reasonable precaution will be taken for the protection of all workers, in all circumstances. Supervisors at KING will be responsible for the health and safety of workers under their supervision.

All supervisors, workers and subcontractors must protect their own, and fellow workers' health and safety by working in compliance with the *Occupational Health and Safety Act* and with all applicable regulations and safe work practices and procedures established by the Company.

KING recognizes that a safe work environment can only be established and sustained through a joint effort by all management, workers, and subcontractors, and that the participation of each person is required. The company will work to develop, maintain, and update safety practices that meet or exceed legislated and COR requirements. Our goal is to ensure the right to a healthy and safe work environment that is free from violence and harassment. King Paving & Construction will work together in the spirit of consultation and cooperation with supervisors, workers, and contractors to continuously improve the health and safety management system.

Everyone, from Senior Management to newly hired workers, has a responsibility to ensure a safe and healthy workplace. While managers and supervisors are responsible for the implementation and enforcement of our health and safety program, we expect all workers and subcontractors to work and conduct themselves in a manner that reflects the company's commitment to safety. For detailed roles & responsibilities please see HSMS 13-02, Duties & Responsibilities.


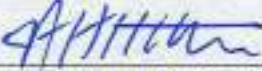
Let us all work together to prevent incidents which result in unwanted losses and personal injuries or illnesses.

King Paving & Construction Ltd.



John Hutter

President

Documents & Record Control	Issue Date: August 29, 2022	
	Revision Date: January 27, 2025	
Policy Number: HSMS 1-03	Revision Number: 005	
 Approved By: President		

POLICY STATEMENT

The goal of the Documents and Records Procedure is to ensure that both our Policy & Program are kept current and to ensure proper management and control of all documents and records. This procedure will ensure that KING complies with the requirements of the Occupational Health & Safety Act (OHSA), COR 2020 and all other applicable legislation, standards, and guidelines.

SCOPE

This procedure applies to Senior Management, all members of the Joint Health & Safety Committee, Foremen, Superintendents, operators, and all personnel that will complete daily inspections or take part in the annual review as well as any necessary updates to the policy and program.

DEFINITIONS

Document: Medium containing information related to the Occupational Health and Safety Management System such as policies, procedures, and practices.

Legible: Capable of being read or deciphered, especially with ease.

Record: Document(s) stating results achieved or providing evidence of activities performed. Examples include training records, records of emergency drills, daily inspections, JHA's, etc.

Policy: A general commitment, direction or intention that is formally stated by senior management

Procedure: A documented specific method for carrying out a task or activity

Practice: A more generalized version of a procedure which states the main guidelines to be followed

SiteDocs: A company that stores all of King Paving & Construction's safety documents and records.


PROCEDURE

All King Paving & Construction's safety documents and records are kept electronically on the company shared drive and/or on SiteDocs. The following chart lists the various documents and records, who is to complete them and submit them, who signs off, and where they are stored/point of use:

****Please note the following****

For a variety of purposes, any of the following documents or records could be stored on the company shared drive.


Within each policy and/or procedure, it is noted as to which document or record needs to be completed & submitted for compliance.

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PREREQUISITES


As per element 1.2.1 of the 2020 version of the COR audit, this procedure for documentation, document control and record control include the following:

- a) Roles and Responsibilities (Listed in the Responsibility section of this procedure)
- b) Documents and records determined by King Paving & Construction to be necessary for the effectiveness of the OHSMS. These documents and records are listed on the chart included in this procedure.
- c) Documents are required to be approved prior to issue. This is listed under Senior Management Responsibilities. The health & safety department will review the document(s) with senior management or the president of the company. The signing authority will review the document and make recommendations where required. Once satisfied, the signing authority will approve and sign the document. The health & safety department will scan the signed document and upload it to the company shared drive at which point the document is issued.
- d) Requirement to review, update, re-approve or withdraw documents as necessary. This is listed under Senior Management Responsibilities.
- e) Requirement to ensure changes to, and current revision status of documents are identified and tracked. This is listed under the Document Requirements section of this procedure.
- f) Requirement to ensure relevant versions of applicable documents are readily available at the point of use. This is listed in the chart as well as under the document requirements section of this procedure.
- g) Requirement to identify documents of external origin that may be necessary for the planning and operation of the OHSMS. This is listed on the chart below and under the document requirements section of this procedure.
- h) Requirement to prevent unintended use of obsolete documents and identify such documents if they are retained for any purpose. This is listed under the document requirements section of this procedure. Obsolete documents will be placed in a protected archived folder (only accessible by the H&S department) based on the year that the document was issued. These archive folders are located on the company shared drive and will only be utilized for reference.
- i) Requirements for the identification and retention of records is necessary to demonstrate conformity to the requirements of the OHSMS. These records and documents are listed on the chart below which identifies the document or record, who fills it out, who signs off and where the document or record is stored.
- j) Requirement for protection of privacy and confidentiality, as appropriate. Any documents deemed confidential will be labeled as such. Examples of confidential records and/or documents include medical records, certain WSIB documents, violence/discrimination/harassment investigations, etc. Confidentiality will be maintained by limiting access to these documents or records to the Health & Safety Department, investigators, and senior management.
- k) Requirement to ensure documents and records remain legible and readily identifiable. Since most documents and records are electronic, legibility is not an issue, however, certain hand-written documents must be legible (as per the definition listed above) and readily available. Hand-written documents should


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be printed as handwriting may be difficult to read. Hand-written documents will be scanned and saved electronically to SiteDocs or the company shared drive once submitted to the health & safety department.


Document/Record	Type	Completed/Submitted By	Signed Off By	Storage Location/Point of Use
H&S Program	Document	H&S Dept	John Hutter	Shared Drive
Safe Work Practice	Document	H&S Dept/Supers	John Hutter	Shared Drive & SiteDocs
Safe Job Procedure	Document	H&S Dept/JHSC	John Hutter	Shared Drive & SiteDocs
Paving Weekly Site Inspection (HSF 9.4)	Record	Foreman	Super or John Hutter	SiteDocs
CVOR Schedule 1 Daily Inspections	Record	Drivers	Equipment & Trucking Super or John Hutter	SiteDocs
Confined Space Bump Test (HSF 11.0)	Record	Foreman	Super or John Hutter	SiteDocs
Confined Space Hazard Assessment (HSF 11.1)	Record	Foremen	Super	Shared Drive
Confined Space Entry Permit (HSF 11.5)	Record	Foremen	Super	Shared Drive
Construction Job Hazard Assessment (JHA) (HSF 2.1)	Record	Foremen/Supers	Super or John Hutter	SiteDocs
Defective Tool/Equipment Removal Report (HSF 7.0)	Record	Foremen/Supers	Super or John Hutter	SiteDocs
Emergency Site Plan	Record	Supers	John Hutter	SiteDocs
Vehicle Pre-Trip Inspection-All Company Vehicles (HSF 9.8)	Record	Operator	Super or John Hutter	SiteDocs
Foreman Weekly Site Inspection (HSF 9.0)	Record	Foremen	Super or John Hutter	SiteDocs
H&S Only Site Inspection Report (HSF 9.1)	Record	Safety Officer	John Hutter	SiteDocs

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Hand & Power Tool Daily/Pre-shift Inspection (Part of Daily JHA form)	Record	Foreman/Operator	Super or John Hutter	SiteDocs
JHSC Monthly Site Inspection (HSF 9.2)	Record	JHSC Worker Rep	John Hutter	SiteDocs
Job Hazard Assessment (JHA) with Weekly Toolbox Talk (HSF 8.0)	Record	Supers/Foremen	Super or John Hutter	SiteDocs
LOTO Permit	Record	Supers/Foremen	Super or John Hutter	SiteDocs
Lockout/Tagout Report (HSF 11.3)	Document	Foremen	Super or John Hutter	SiteDocs
New Tool/Equipment Purchase (HSF 7.1)	Record	Supers/Foremen	Super or John Hutter	SiteDocs
Office Monthly/JHSC Inspection Checklist	Record	JHSC Worker Rep	John Hutter	SiteDocs
Operator's Daily/Pre-shift Inspection (HSF 9.3)	Record	Operator	Super or John Hutter	SiteDocs
Paving/Construction Job Hazard Assessment (JHA) (HSF 2.2)	Record	Paving Foremen	Super or John Hutter	SiteDocs
Pre-Shift Forklift	Record	Operator	Super or John Hutter	SiteDocs
Pre-shift Skid Steer/Loader	Record	Operator	Super or John Hutter	SiteDocs
Safety Recognition Card (HSF 8.7)	Record	JHSC Member	Safety Dept	SiteDocs
Senior Management Monthly Site Inspection (HSF 9.6)	Record	President/Snr PM/Safety Officer	John Hutter	SiteDocs
Superintendent Pre-Job Start Hazard Assessment (HSF 2.3)	Record	Supers	John Hutter	SiteDocs
Superintendent/JHSC Monthly Site Inspection	Record	Supers/JHSC Rep	John Hutter	SiteDocs

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Vehicle Pre-Trip Inspection – All Company Vehicles (HSF 9.8)	Record	Driver of Vehicle	Office Admin or John Hutter	SiteDocs
Acknowledgement of Training/Reference Material Received	Record	Trainer	Safety Dept or John Hutter	SiteDocs
Corrective Action Evaluation Form	Document	H&S Dept/Foremen/Supers	Senior PM or John Hutter	SiteDocs
Fit test Training	Record	Trainer	Safety Dept	SiteDocs
Construction Job Hazard Assessment (JHA) w TBT (HSF 8.0)	Record	Foremen	Super or John Hutter	SiteDocs
Foremen Meeting Minutes	Record	Office Admin	John Hutter	SiteDocs & Shared Drive
Generic Meeting Minutes (HSF 8.1)	Record	Facilitator	John Hutter	SiteDocs
JHSC Meeting Minutes (HSF 8.2)	Record	JHSC Rep	John Hutter	SiteDocs & Shared Drive
New Worker Orientation Form (HSF 8.4)	Record	Trainer/H&S Officer	Safety Dept or John Hutter	SiteDocs
Record of Emergency Preparedness Drill (HSF 11.4)	Record	Foremen/H&S Officer	Super or John Hutter	SiteDocs
Return to Work Closure/Evaluation Report	Record	H&S Dept	John Hutter	SiteDocs
Return to Work Contact Record (HSF 8.5)	Record	H&S Dept	John Hutter	SiteDocs
Return to Work Form Plan	Record	H&S Dept/Worker	John Hutter	SiteDocs
SWP Training Record	Record	Foremen	Safety Dept or John Hutter	SiteDocs
Senior Management Meeting Minutes (HSF 8.8)	Record	Office Admin	John Hutter	SiteDocs & Shared Drive
Site Orientation & Specific Guidelines for Sub-Contractors (HSF 4.0)	Record	Supers/Foremen	Super or John Hutter	SiteDocs

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Site Orientation & Specific Guidelines for Workers (HSF 8.9)	Record	Supers/Foremen/H&S Dept	John Hutter	SiteDocs
Superintendent Meeting Minutes	Record	Office Admin	John Hutter	Shared Drive
Training Attendance Record	Record	Trainer/Facilitator	Safety Dept	SiteDocs
Witness Statement Form	Record	Supers/Foremen	Safety Dept	SiteDocs
Incident Report – Injury, Theft, Damage, Utility Hit (HSF 10.2)	Record	Supers/Foremen	Supers or John Hutter	SiteDocs
First Aid Record (HSF 10.0)	Record	First Aider	Supers or John Hutter	SiteDocs
Generic Incident Report Form	Record	Foremen/JHSC/H&S Dept	Supers or John Hutter	SiteDocs
Hazard Assessment Form (HSF 2.0)	Record	Supers/Foremen/H&S Dept and JHSC Reps	Safety Dept or John Hutter	SiteDocs
Incident Investigation Form (HSF 10.1)	Record	H&S Dept	John Hutter	SiteDocs
Near Miss Report (HSF 10.3)	Record	Foremen/Supers	Supers or John Hutter	SiteDocs
Tap Root Cause Analysis	Document	H&S Dept	John Hutter	SiteDocs
Third Party Reporting Form	Record	Foremen/Supers	Supers or John Hutter	SiteDocs
Utility Hit Report Form	Record	Foremen/Supers	Supers or John Hutter	SiteDocs
Worker Incident Report Form	Record	Foremen/Supers	Senior PM or John Hutter	SiteDocs
Safety Memos/Emails	Record	Author of Memo/Email	Author of memo/Email	Shared Drive
Superintendent Performance Report Form (HSMS 14-06)	Document	Senior PM/John Hutter	Senior PM/John Hutter	Shared Drive
Foreman Performance Report Form (HSMS 14-07)	Document	Supers	Supers	Shared Drive

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Signs/Tags	Document	Safety Dept	Safety Dept	Shared Drive
3 rd Party Confined Space Equipment Annual Inspection Form	Record	Safety Dept	Safety Dept	Shared Drive
3 rd Party Fire Extinguisher Annual Inspection Form	Record	Safety Dept	Safety Dept	Shared Drive
MOL Field Visit Reports	Record	Foreman/Super	N/A	Shared Drive
MOL Orders	Record	Foreman/Super	N/A	Shared Drive
MOE Field Visit Report	Record	Foreman/Super	N/A	Shared Drive
MOE Orders	Record	Foreman/Super	N/A	Shared Drive
WSIB Reports	Record	Safety Dept	N/A	Shared Drive
Statistical Trend Analysis	Document	Safety Dept	John Hutter	Shared Drive
COR Audits	Document	Safety Dept	John Hutter	Shared Drive
Toolbox Talks	Document	Safety Dept	N/A	SiteDocs & Shared Drive
AED Inspection Form (HSMS 11-04)	Record	Safety Dept	Safety Dept	Shared Drive
Form 1000's/NOP's/Insurance/WSIB	Document	Estimators/Safety Dept	Safety Dept	Shared Drive
Safety Awards	Document	Safety Dept	N/A	Shared Drive
Training Records	Record	Safety Dept	N/A	SiteDocs & Shared Drive
Gas Detector List	Document	Safety Dept	Safety Dept	Shared Drive
Equipment List	Document	Safety Dept & Trucking Equipment Super	N/A	Shared Drive
Service/Maintenance Reports	Record	Foremen/Trucking & Equipment Super	N/A	Shared Drive
Site Photos	Document	Safety Dept/Supers	N/A	Shared Drive
Policy Review Maintenance Log	Record	Safety Dept	N/A	Shared Drive

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Health & Safety Binders/Boards	Document	Safety Dept	N/A	Shared Drive
Chemical Inventory Form	Document	Foremen	N/A	Shared Drive
SDS Binders	Document	Safety Dept	N/A	Shared Drive
H&S Orientation Video	Document	Safety Dept	John Hutter	Shared Drive
RTW Package	Document	Safety Dept	John Hutter	Shared Drive
RTW and Re-employment Forms	Record	Safety Dept	John Hutter	Shared Drive
Crew Schedule	Record	Supers	Senior PM	Microsoft Teams
JHSC Recommendation Form (HSF 8.3)	Record	JHSC	John Hutter	SiteDocs & Shared Drive

RESPONSIBILITIES

General Reporting Responsibilities:

The following documents are records (including those listed in the previous chart) that have been determined by King Paving & Construction to be necessary for the effectiveness of the Occupational Health and Safety Management System. The following is a list of the required reporting responsibilities, documents and records that must be filled out and submitted to ensure that we are staying safe as well as meeting our COR requirements.

DAILY


- Field Vehicle Pre-Trip Inspection
- Company Vehicle Pre-Trip Inspection
- JHA / Paving JHA
- Hand & Power Tool Daily/Pre-Shift Inspection
- Operator's Pre-Shift Inspection

WEEKLY

- Weekly Foreman's Site Inspection
- JHA with TBT

MONTHLY

- Super's Monthly Site Inspection
- JHSC Monthly Site Inspection (all committee members to complete one)
- Office Monthly Site Inspection
- Senior Management/H&S Monthly Site Inspection
- Safety Observation Card (JHSC to complete 2 per month)

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JOB SPECIFIC

- Pre-start Checklist
- Pre-Job Start Hazard Assessment
- Workplace Violence & Harassment Risk Checklist
- Site Specific Workplace Violence & Harassment Risk Assessment
- Emergency Site Plan
- Site Orientation for Subcontractors

CONFINED SPACES

- Hazard Assessment
- Entry Permit
- Bump Test


AS REQUIRED

- New Tool/Equipment Purchase
- Defective Tool/Equipment Removal
- Near Miss Reporting
- Incident Reporting
- Utility Hit Reporting
- Company Equipment Damage/Loss/Theft Reporting
- First Aid

REMEMBER, IT IS IMPERATIVE THAT IF THE FORM YOU ARE COMPLETING STATES THAT YOU NEED A PICTURE, PLEASE, TAKE THE PICTURE.

DOCUMENT REQUIREMENTS:

- Documents are required to list the roles and responsibilities of the pertinent parties involved.
- All documents must be approved by either Senior Management, the Health & Safety Department or the JHSC prior to being issued and used.
- All documents are to be reviewed, updated, revised, re-approved or withdrawn as necessary.
- All documents are reviewed on a yearly basis as a minimum.
- All changes, updates and revisions are to be logged and tracked.
- All relevant versions of documents must be available at the point of use. Although most of our documents are on SiteDocs, there may be paper copies for some tasks (i.e., CVOR inspections, Confined Space Permits, etc.).
- All documents of external origin must be identified, checked for compliance, relevant, and necessary for the planning and operation of the King Paving & Construction Occupational Health and Safety Management System
- Obsolete documents are to be eliminated to prevent unintended use. Prior to eliminating a document, the document in question will be reviewed by the health & safety department. It should be noted that certain documents, including those that have been deemed as obsolete, may still be required to be retained for reference purposes.

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- Documents related to conformity of the Occupational Health and Safety Management System are to be identified and retained as necessary and for a duration that is required by regulations and standards (i.e., confined space permits, safety equipment inspection records, etc.).
- Certain documents are required to be kept confidential. When this is the case, the policy and/or procedure governing the requirement for confidentiality will state the reason(s) that the document will be held in confidence, and the parties or personnel to which the confidentiality applies.
- Although most documents used by King Paving & Construction are digital, certain documents are required to be filled out in writing. When this is the case, the document must be legible and readily identifiable.

REQUIRED RESOURCES

The following resources are required to maintain this procedure:


- Adequate space in the company shared drive dedicated to the safety department.
- Annual subscription to SiteDocs.
- Access to SiteDocs by all safety personnel, superintendents, foremen and equipment operators.
- Training for all personnel who have access to SiteDocs.
- Trained personnel regarding COR auditing.
- Printing and distribution of documents as required (i.e., Confined Space Permits, Foreman's safety binders).

Senior Management will:

- Review the Health & Safety Policy and Program annually to ensure it is kept current. Upon review and approval, each policy, procedure, and practice will be signed off by the Company President.
- Review, update, re-approve or withdraw documents as necessary.
- The Health & Safety Policy will be signed annually by the company president.
- Policies, procedures, and documents must be approved by senior management and signed off.
- Review SiteDocs records and sign off after review as required.
- Ensure that the current Health & Safety Policy is posted on all job sites and on office Health & Safety Boards.
- Ensure that all employees receive a copy of the Health & Safety Policy and that they are trained in any changes and/or additions that were made to meet regulations.
- Allocate appropriate resources, training, and employees to implement and maintain the Health & Safety Policy & Program procedure.
- Ensure that documents and records are maintained as per this procedure (HSMS 1-03 Document and Record Control)

JHSC will:

- Work jointly with Senior Management and the safety department to revise and update policies, practices, and procedures.

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- Review the Health & Safety Policy and Program annually to ensure it is kept current.
- Make any necessary changes to meet all regulations.
- Fill out and submit all SiteDocs records and forms that are assigned to JHSC members. Before submitting have the site foreman and site superintendent sign. These forms must also request a signature from the Health & Safety department.

Health & Safety Department will:


- Create, where necessary in consultation with subject matter experts, all safety-related documents.
- Review the Health & Safety Policy and Program annually to ensure it is kept current.
- Ensure that documents and records are maintained as per this procedure (HSMS 1-03 Document and Record Control)
- Make any necessary changes to meet all regulations.
- Ensure that the current Health & Safety Policy is posted on all job sites and on office Health & Safety Boards.
- Ensure that all employees receive a copy of the Health & Safety Policy and that they are trained in any changes and/or additions that were made to meet regulations.
- Review and sign off on all SiteDocs documents, forms and records which have been assigned.
- Ensure that all forms and records are reviewed by the appropriate party and signed off accordingly.
- Ensure that any revisions or updates made to policies, procedures, practices, forms, and records are logged.

Superintendents:

- Complete the required inspections, toolbox talks and job hazards assessments and submit them to SiteDocs.
- Ensure that all foremen are completing their assigned inspections, JHA's and toolbox talks and submitting forms promptly to SiteDocs.
- Ensure that traffic control plans are available on site and specific to the location.
- Ensure site orientations are conducted with sub-contractors and the record is submitted to SiteDocs.

Foremen:

- Complete site inspections as required and submit the form to SiteDocs.
- Ensure that all work is conducted in accordance with regulations and company policies, procedures, and practices.
- Ensure that operators are inspecting their equipment at the beginning of each shift and submitting the inspection record to SiteDocs.
- Ensure that incident reports, near miss reports, utility hit forms and first aid reports are completed promptly and submitted to SiteDocs.

Documents & Record Control	Issue Date: August 29, 2022	
	Revision Date: January 27, 2025	
Policy Number: HSMS 1-03	Revision Number: 005	

	<i>Approved By: President</i>	

Workers:

- Workers are to work in accordance with the regulations and all company policies, procedures, and practices. Certain workers such as operators must complete their equipment inspections and submit the form to SiteDocs.

TRAINING

All applicable Senior Management, members of the JHSC, and the Health & Safety department will be kept current with all legislative changes and any applicable training required for the ongoing maintenance of this procedure.

COMMUNICATION

This procedure will be communicated to all applicable to all King Paving & Construction personnel. In addition, new policies, practices and procedures or ones that have been revised will be communicated through toolbox talks throughout the year.

EVALUATION AND CONTINUOUS IMPROVEMENT

This procedure will be evaluated on an on-going basis and reviewed annually by Senior Management and the JHSC.

The amended procedure shall be kept as a record for review.

The revision of this document shall be tracked at the bottom of the procedure and recorded on the document maintenance tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy	New COR Requirement	Aug 29, 2022	000
Added "Prerequisite" section to the procedure to ensure full compliance with element 1.2.1 of the 2020 version of the COR audit	Annual review and procedure update	Jan 04, 2023	001
Revised wording in 1,2,1 and added processes	COR audit corrective action plan requirement	Apr 27, 2023	002
Added Required Resources Section	Annual Review and Update	Jan 08, 2024	003
Replaced eCompliance with SiteDocs	Change is safety platform	Nov 13, 2024	004
Minor changes to wording in the chart. Reworded Policy Statement	Annual Review	Jan 27, 2025	005

Hazard Assessment, Analysis and Controls Policy	Issue Date: December 6, 2017	
	Revision Date: January 27, 2025	
Policy Number: HSMS 2-01	Revision Number: 009	
	 Approved By: President	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to the prevention of injuries & illness by immediately eliminating or controlling hazards as soon as they are identified to protect the health & safety of workers, subcontractors & visitors.

For that purpose, King Paving & Construction Ltd. has established procedures to identify, assess, analyze & control hazards. This will include routine, non-routine operations, outside workplace hazards and the human factors where work is performed. Risks resulting from the identified hazards will be classified and prioritized and a list of the identified critical tasks will be maintained.

The assessment process must be completed prior to the start of all jobs to identify existing or potential hazards to workers; eliminate or control these hazards using engineering or administrative controls, proper training and/or by using personal protective equipment. The information gathered during the assessment is to be communicated to all personnel who are assigned to a site on their first day prior to the start of work. Additionally, a daily job hazard assessment (JHA) will be completed and communicated to everyone on site.

This policy and procedure work in conjunction with HSMS 2-02 Critical Task List, HSMS 3-05 Controls, risk assessments, and all safe work practices and procedures.

SCOPE AND REGULATIONS

This policy pertains to all workers, visitors, subcontractors, and service providers, at all work locations, where King Paving & Construction Ltd. conducts business.

All parties are required to take a proactive approach to identifying, reporting, and managing hazards in the workplace.

When they observe a hazard, they are required to take steps to manage that hazard directly (provided they are adequately knowledgeable/trained to safely do so); eliminate the hazard or get assistance from appropriate persons to do so, whenever reasonably possible.


Where hazards cannot be eliminated immediately, take necessary steps to warn others of the hazard. Report hazardous or potentially hazardous conditions and acts to a supervisor or your supervisor or site contact, if working as a sub-contractor.

Reference O. Reg 213/91 25(2)(h)

DEFINITIONS

For this policy, the following definitions will be used.

Acceptable Risk – Risk that has been reduced to a level that can be tolerated by the organization having regard to its legal obligations and its own OH&S policy.

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Competent Person – As per the Ontario Occupational Health and Safety Act, a competent person is a person who:

- a) Is qualified because of knowledge, training, and experience to perform the work,
- b) Is familiar with the Occupational Health and Safety Act and the provisions that apply to the work, and
- c) Has knowledge of all potential and actual danger to health or safety in the work.

Consequence Matrix – Means of combining qualitative and quantitative ratings of consequence and probability to produce a level of risk or risk rating.

Harm – Physical injury or damage to health.

Hazard – A source of potential harm to people or a situation with potential to cause injury or loss to plant, property, and equipment. Hazards can be grouped as physical, chemical, ergonomic, biological, or psychological.

Hazardous Event – An immediate event or event that is extended over a period of time that can cause harm.

Hazardous Situation – A circumstance in which a person is exposed to a hazard or multiple hazards.

Hazard Control – The process of implementing measures to reduce the risk associated with a hazard.

Hazard Identification – The process of identifying all situations or events that could give rise to injury, illness or damage to plant or property.

Health – Refers to the physical and psychological health of a worker.

Incident – Work related event(s) in which an injury or ill health (regardless of severity) or fatality occurred or could have occurred.

Probability – The likelihood of an event occurring.

Procedure – A documented method for carrying out an activity.

Process – A set of interrelated or interacting activities.


Qualitative and Quantitative Assessments – Defines the result or consequence, probability or occurrences and level of risk by using the terms such as “high”, “medium” or “low”.

Risk – Is the consequence or result of exposure to a hazard.

Risk Assessment – Is a systematic process of evaluating the potential risks that may be involved in an activity or task. The result of the assessment is the development of the risk rating.

Risk Analysis – The part of the assessment that contributes to the development of an understanding of all risks. All risk assessment tools contain methods of measuring or evaluating the potential risks.

Supervisor – Person who has charge of a workplace or authority over another worker.

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Visitor – A person who is not employed by the Company. This person may be a salesperson, trainer, client, or someone who may have interest in the operations.

Worker – Means any of the following, but does not include an inmate of a correctional institution or like institution or facility who participated inside the institution or facility in a work project or rehabilitation program:


- A person who performs work or supplies services for monetary compensation.
- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school board.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied art and technology, university, or other post-secondary institution.
- A person who receives training from an employer, but who under the "Employment Standard Act, 2000" is not a worker for the purposes for that Act because of the condition set out in subsection 1(2) of that Act have been met.
- Such other person as may be prescribed who perform work or supply services to an employer for no monetary compensation.

Worker Safety Representative – Worker member of the JHSC or a Health & Safety representative as defined in the OHSAA.

PREREQUISITES

To ensure full compliance with element 2.2 of the 2020 version of the COR audit, the following items are required:


- a) All roles and responsibilities must be clearly defined in writing. These roles and responsibilities are listed in the responsibilities section of this procedure.
- b) Required competencies for conducting hazard assessments, analysis, and control. All personnel involved in conducting hazard assessments will be competent people. The personnel involved will have valid training records in courses such as hazard assessment, analysis, and control, JHSC certification, IHSA BOS training, etc. The specific competency requirements for persons conducting hazard assessments are listed below in the "Competencies" section of this policy.
- c) There is a requirement for the involvement of appropriate competent workplace parties such as workers, supervisors, maintenance, engineering, and suppliers in the hazard assessment process. Competent workers, supervisors, maintenance, engineering, and suppliers will be involved in the hazard assessment process as it pertains to the work being performed and the equipment that is to be used or operated. As part of the daily JHA meetings and weekly toolbox talk meetings, all superintendents, foremen and workers are encouraged to make recommendations based on their observations and experience performing their tasks and based on equipment and tools that they may use. The same holds true for estimators, engineers, maintenance personnel and subcontractors. Any recommendations, corrective actions or notable participation will be listed on the SiteDocs form that is pertinent to the type of meeting that has taken place.

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- d) King Paving & Construction has a requirement to conduct hazard assessments for all operations, including routine and non-routine, and human factors where work is performed. King Paving & Construction conducts hazard assessments daily at all our sites during the JHA meetings which includes the participation of workers, supervisors, and subcontractors. The daily JHA form is filled out based on the tasks being performed and the personnel involved. The JHA form is then submitted to SiteDocs for signing off by senior management. The hazard assessments are conducted by competent persons who have been trained as per the topics listed in the competencies section of this procedure. Foremen and superintendents are to communicate the pertinent sections of the hazard assessment and ask all personnel what can be done to make the job or task safer. All recommendations are to be logged into the SiteDocs form and submitted as per HSMS 1-03.
- e) Requirement for reporting actual and potential hazards. All King personnel and subcontractors are required to report actual and potential hazards immediately to the foreman or superintendent in accordance with KPC rules, policies, and procedures, specifically HSMS 10-03 Incident Reporting Guide.
- f) King Paving & Construction will conduct risk assessments for identified hazards:
- i. Proactively prior to the commencement of tasks
 - ii. When equipment, material, substance, or process is introduced or changed.
 - iii. When a change to the Occupational Health and Safety Management System may impact workplace operations or activities.

The procedure for conducting risk assessments is included in the Pre-Job Hazard Assessment Safety Planning Procedure section of this procedure.

- g) Identification of when to review and update hazard assessments. KPC reviews and updates hazard assessments after investigations, when there is a change in tasks within a project, and at the start of each project. Hazard assessments are reviewed annually by the health & safety department and revised or updated as necessary. All updates are referenced in each procedure and are reviewed by the JHSC during quarterly meetings and annually by the president of the company. Upon approval, the updated policy or procedure will be signed and dated by the president of the company and added to the Health & Safety Program.
- h) KPC will identify hazards that originate outside of the workplace that may impact occupational health and safety within a workplace for which KPC has control. This will be accomplished by communication with subcontractors regarding the work processes that they will be completing on site, and/or with the hiring client. The communication will also identify physical hazards such as soil condition, drainage patterns, locations of confined spaces, electrical hazards, chemical hazards, and any other hazards which may affect the health and safety of King personnel, subcontractors, and the public where applicable. When such hazards are identified, a hazard assessment will be conducted by the site superintendent and control measures put in place specific to the hazard. The site superintendent will also communicate with the health & safety department, the JHSC and the safety personnel from the subcontractor or hiring client to develop the best possible control measures for the specific hazard and tasks.
- i) Legal requirements and associated standards and guidelines are considered while conducting all hazard assessments. Legal and other requirements are initially determined by the estimating department as they

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pertain to the job that is being quoted on. King Paving & Construction has the applicable legislation, guidelines and standards listed in each policy, procedure and practice as it pertains to the specific tasks that will be performed on the job. All superintendents and foremen are to observe all work to ensure that all work conducted on King sites meets or exceeds these legislative requirements, guidelines, and standards.

- j) The design and layout of each work site with respect to ergonomics, machinery, and equipment to be used on site, access and egress, and tidiness are considered while conducting hazard assessments. Prior to the start of a project, the site superintendent will conduct a Pre-Start Hazard Assessment and develop an emergency site plan. The document and checklist that is used is entitled "Superintendent Pre-Start Hazard Assessment and Emergency Site Plan" and is in the inspections section on SiteDocs.
- k) KPC uses a standardized risk rating system to prioritize risks before and after identifying controls. Controls for hazards are communicated to the workers during the daily JHA meeting and weekly toolbox talks. Each task has a specific hazard assessment that has been completed which utilizes the standardized risk rating system and lists the control measures that are to be followed to minimize risk. These hazard assessments are located on SiteDocs under the "Hazard Assessment" section. To directly access a hazard assessment for a specific task, the superintendent or foreman will log onto SiteDocs, select Hazard Assessment, then select a hazard assessment for the specific task or hazard.
- l) KPC has developed a list of critical tasks and activities based on the risk rating system. Identification of critical tasks, and a list of the most common critical tasks that King Paving & Construction personnel are involved with is listed in the "Identification of Critical Tasks" section of this procedure.
- m) Risk assessment forms have been developed and are utilized for recording hazard assessments, analysis, and controls. These forms are maintained on SiteDocs.
- n) All documents and records are maintained as per the procedure HSMS 1-03 Document and Record Control.


COMPETENCIES

The following is a list of competencies that are required by personnel who conduct hazard assessments:

Superintendents, Managers and Foremen: For a superintendent, manager, or foreman to be considered competent to conduct hazard assessments, he/she must have received training in at least one of the following:

- IHSA Basics of Supervision (BOS)
- Supervisor Due Diligence or equivalent
- JHSC Certification Parts I and II
- IHSA Hazard Recognition, Analysis and Control
- OSG Job Hazard Analysis

Health and Safety Personnel: Health and safety personnel include health and safety officers, health and safety coordinators and Joint Health & Safety Committee members. Health and Safety personnel must have received training in at least one of the following training courses to be considered competent to conduct hazard and risk assessments:

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- Supervisor Due Diligence or equivalent
- JHSC Certification Parts I and II
- IHSA Hazard Recognition, Analysis and Control

HAZARD CONTROLS

When a hazardous condition is identified, corrective actions will be promptly implemented in a timely manner according to the hazard. The following list highlights preferred methods of control in descending order:

1. **Elimination:** Remove the hazard or hazardous situation whenever possible.
2. **Substitution:** Substitute the hazardous product or element with a less hazardous option.
3. **Engineering:** Implement engineering designs and control measures whenever reasonably practical.
4. **Administrative:** Implement safe work policies, procedures, and practices to ensure the hazardous element is controlled adequately.
5. **Personal Protective Equipment (PPE):** Implement adequate PPE to ensure the hazardous condition does not affect exposed workers.


Once hazards are identified and assessed, it is necessary to develop formal controls for workplace parties to follow to ensure their safety. Please refer to "HSMS 3-05 Controls" for the specific procedures used to identify, develop, and implement hazard controls. King Paving has developed a new risk assessment form that utilizes a 5X5 risk matrix to identify the likeliness of an incident occurring, and its potential impact. The risk for each task, and subtasks are rated, and hazards are listed. Controls are then developed, and the task(s) are re-rated. This aids in showing the effectiveness of the controls that have been put in place.

Following the risk matrix (on the same form), human factors are considered based on the task being performed, and a section following the hierarchy of controls is filled out. This section identifies which of the control methods can be implemented, and what specific controls will be utilized. A detailed description of the risk assessment process and form are included in the Hazard Assessment section of this procedure. A sample of a completed risk assessment is also included.

IDENTIFICATION OF CRITICAL TASKS

A critical task is one that may include the following factors:

- Jobs with a high frequency of accidents or near misses which pose a significant threat to health and safety.
- Jobs that have the potential to produce fatalities, disabling injuries, illnesses, or environmental harm.
- Newly established jobs whose hazards may not be evident because of lack of experience.
- Jobs that are to be performed in hazardous and/or unfamiliar environments. (i.e., confined spaces, restricted access, excavations, heavy equipment, elevated work surfaces, and unfamiliar work sites).

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RISK ASSESSMENTS AND CRITICAL TASK THRESHOLDS:

The risk assessment form is colour-coded and rates each task and subtask as to the likeliness of an incident occurring, and the potential impact should an incident occur. Both the likeliness and the impact are rated from 1 to 5 as follows:

		Impact →				
		Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
Likelihood ↑	Almost Certain (>1 in 10) 5	Medium 5	High 10	Extreme 15	Catastrophic 20	Catastrophic 25
	Likely (1 in 20) 4	Low 4	Medium 8	High 12	Extreme 16	Catastrophic 20
	Occasional (1 in 200) 3	Low 3	Medium 6	High 9	High 12	Extreme 15
	Unlikely (1 in 2000) 2	Very Low 2	Low 4	Medium 6	Medium 8	High 10
	Rare (<1 in 10000) 1	Very Low 1	Very Low 2	Low 3	Low 4	Medium 5

The determination of whether the task is to be considered as critical is based on the pre-control risk rating. King Paving & Construction has set a pre-control threshold value of 20, which will show in the red section of the matrix.

The colour coding for risk ratings is as follows:

Very Low: Ratings from 1 to 3 show as dark green. Priority Low – Attend to within 90 days

Low: Ratings from 4 to 5 show as light green, Priority Low – Attend to within 90 days

Medium: Ratings from 6 to 8 show as yellow. Priority Medium – Attend to within 30 days


High: Ratings from 9 to 12 show as orange. Priority High – Immediate Attention Required

Extreme: Rating from 15 to 16 show as dark orange. Priority High – Immediate Attention Required.

Catastrophic: Ratings from 20 to 25 show as red. Priority High – Immediate Attention Required

The likeliness and impact are rated numerically from 1 to 5. The values given for likelihood and impact are multiplied to give the risk rating for the task and subtasks. The risk rating is completed

If any one of the subtasks receives a **pre-control** risk rating of 20 or higher (Red), the overall task is deemed to be critical and will be **identified as a critical task on the risk assessment form.**

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IMPORTANT NOTE: If any one of the subtasks receives a **post-control risk rating of 20 or higher, the task must not be conducted** until such time as new controls can be put in place to lower the post-control risk rating to under 20.

A full description of the risk assessment matrix is found in the hazard assessment section of this procedure.

A full list of critical tasks based on the completed risk assessments is included in HSMS 2-02 Critical Task List. Examples of critical tasks include, but are not limited to the following:


- Confined Space
- Backfilling
- Working at Heights
- Excavation sites
- Work involving high voltage, or buried utilities
- Working over or around water
- Working with hazardous materials (asbestos, silica, etc.)
- Working with or around large heavy machinery and equipment
- Large material lifting task

It is the Senior Project Manager and site Superintendent's responsibility to ensure that required inspections and forms have been completed, all provincial legislation and code requirements have been completed and made readily available for review during critical task activities on the job sites.

REQUIRED RESOURCES

To effectively implement the hazard assessment, analysis and control policy and procedure, the following resources are required:

- Personnel that meet the competency requirements listed in the competencies section above.
- Completed Risk Assessment forms
- Access to the SiteDocs app for all personnel involved in completing hazard assessments.
- Review and signature(s) from management and/or the safety department.
- A significant amount of time per assessment.
- Access to the company shared drive and the safety folders therein.
- Access to a computer, tablet, or cell phone.
- Access to the photocopier and scanner.
- On occasion, time discussing the tasks with workers and foremen.
- P.P.E. that is required for the site or location.

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PRE-JOB HAZARD ASSESSMENT SAFETY PLANNING PROCEDURE

A pre-job start-up meeting is an important chance for the people in charge of a project to review and plan procedures, facilities, timelines, etc., including a full review of health and safety compliance to be in effect.

Superintendent Pre-Start Hazard Assessments & Emergency Site Plan (Document review of the following):

- Hazard assessments, particularly for tasks or areas that tend to involve frequent and/or severe injuries, and for tasks that are new to the jobsite, recently changed, or seldom performed.
- Timing and frequency of on-site inspections, by who and type of inspection.
- Special safety risks due to specialized equipment, environmental or weather conditions, site conditions, etc.
- Special safety items that must be installed, rented, or purchased in advance due to special work activities.
- A list of special equipment needed to ensure safety on all tasks, including PPE for all workers, and an inventory of its availability for all workers who will need it. Methods and/or checklists for PPE distribution, and for the tracking of all safety equipment shall be established with the assistance of the Health & Safety Department.
- First aid procedures that must be followed for the job site and specific first aid information, such as nearest hospital, shall be created and posted at the job site.
- Security measures needed, including site requirements for public, worker, property, equipment, and tool protection.
- Accident reporting procedures. Ensure that all levels of supervision are aware of reporting requirements. All Company forms are available on SiteDocs.
- Additional site-specific worker training, site orientation, etc., may be required for job sites. Ensure workers have the required proof of training that may be required to accompany the workers on the jobsites.
- Review any subcontractor's prequalification packages that may be required to perform work on the jobsites. Subcontractors must be approved by the Company prior to performing work on the job site.

HAZARD ASSESSMENTS


A hazard assessment must be completed prior to project start by King Paving & Construction Ltd., monthly or whenever site conditions change significantly.

Hazard assessments will be reviewed, and updated as necessary, at every toolbox talk throughout the duration of the project.

A hazard assessment is a careful analysis of all potential hazards associated with the entire jobsite. It is a process where a "team" effort is required. The designated person will fill in the tasks to be completed, along with the priority ranking, hazards, and the controls to be instituted.

Hazard Priority Ranking

(the rankings estimate the severity of the problem if a potential accident were to occur)

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Identification and Storage of Risk Assessment Forms: All risk assessment forms are identified by the letters RA, followed by the overall task name. For example, RA – Backfilling, or RA – Confined Spaces.

All completed risk assessment forms are stored on the company shared drive in the safety folder in the subfolder "Risk Assessments".

The completed risk assessment forms are also stored in the resources section on SiteDocs.

All tasks conducted at King Paving & Construction are rated as to the likelihood of an incident occurring, and the potential impact of the incident. Below is a description of the likelihood and impact rating system:


Likelihood (Probability) Rating

The likelihood, or probability, of a risk refers to the chance of the risk event occurring. The definitions for the rating scale may be qualitative, quantitative, or a combination of both and should be customized based on the types of risk events being analyzed. For example, natural disaster events may occur at rates of months to millennia, while risk events at a construction site might occur at rates of hours to days or years.

Below is an example of a 5-point rating scale for the likelihood axis, along with some examples of different types of qualitative and quantitative definitions.

5-Point Rating Scale for the Likelihood Axis

Rating	Label	Description	Probability	Frequency	Rate	Example
1	Rare	Very rare or highly unlikely	<0.01%	≤1 in 10,000	Once per Century	Possible, but hasn't been observed anywhere yet
2	Unlikely	Could occur at some time	0.1% - 1%	1 in 2,000	Once per Decade	Has not occurred here, but has been observed elsewhere
3	Occasional	Might occur occasionally	1% - 20%	1 in 200	Once per Year	Has occurred at least once
4	Likely	Likely to occur often	20% - 95%	1 in 20	Once per Month	Has occurred occasionally (annually)
5	Almost Certain	Expected under most conditions	>95%	≥1 in 10	Once per Week	Has occurred frequently (multiple times per year or even weekly/daily)

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Impact (Severity) Rating


The horizontal axis of the risk assessment matrix measures the **Consequence, Impact or Severity** of the risk *if it does occur*. These three terms are used synonymously, so King Paving & Construction has opted to use the term "Impact".

When rating the impact or severity to rate just a single occurrence of the failure or event, not the overall impact of all events. For example, you can ask "If this failure does occur, how severe is the consequence of a single occurrence? Is the consequence Insignificant, Minor, Moderate, Major, or Catastrophic?"

The rating scale below provides a few examples.

Example: 5-Point Rating Scale for the Impact Axis

Impact Rating	Impact	Operational Effect	Financial Effect	Injury	Pain Level
1 - Insignificant	Minimal or no impact	Negligible delay (<1 day)	Minimal financial effect	Annoyance-level injury at most	0 Pain
2 - Minor	Low impact	Minor operational delay (a few days)	Acceptable financial setback	Injury may require non-professional first aid	1-2 Pain
3 - Moderate	Noticeable impact	Significant project delay (a few weeks)	Moderate financial loss	Injury may require professional treatment	3-6 Pain
4 - Major	Significant impact	Widespread project disruption (a year or more)	Large financial loss	Hospitalization	7-9 Pain
5 - Catastrophic	Critical impact	Project failure or cancellation	Severe financial damage	Death or permanent disability	10 Pain

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Below is a completed risk assessment for backfilling:

Risk Assessment Template

TASK: Backfilling



FOUR: Backfilling



#	Type	Issue	Pre-Control (RCS)	Pre-Control (RCS)	Residual Risk	Comments	Pre-Control (RCS)	Pre-Control (RCS)	Residual Risk
1	Support equipment in uncontrolled surface fully controlled area	Operator equipped, vehicle control status. (Risk is fully mitigated by operator status)	3	3	4	Support equipment with an operator, vehicle control status. (Risk is fully mitigated by operator status)	3	3	4
2	Worker fall from edge, into hole, or into trench	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	4	4	10	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	4	4	10
4	Worker fall from edge, into hole, or into trench	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	3	3	10	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	3	3	10
4	Worker fall from edge, into hole, or into trench	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	4	4	10	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	4	4	10
5	Worker fall from edge, into hole, or into trench	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	3	3	10	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	3	3	10
6	Worker fall from edge, into hole, or into trench	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	3	4	10	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	3	4	10
7	Worker fall from edge, into hole, or into trench	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	3	2	4	Worker placed on edge, into hole, or into trench. Worker not in control. Worker not in control. Worker not in control.	3	2	4


CRITICAL TASK THRESHOLD: IF ANY OF THE PRE-CONTROL RISK SCORES EXCEED 20, THE TASK IS CONSIDERED TO BE A CRITICAL TASK

CRITICAL TASK: YES

HUMAN FACTORS: Standing for long periods of time. Possible poor posture. Dehydration on hot days. Workers need to be protected from the sun. Workers may also need to use bug repellent to protect them from ticks. Constant loud noise can cause communication errors and lead to fatigue.

HIERARCHY OF CONTROLS	IMPLEMENTATION POSSIBLE?	CONTROL MEASURES
ELIMINATION	No	
SUBSTITUTION	No	
ENGINEERING	No	
ADMINISTRATION	Yes	Workers are to follow the safe work procedure for backfilling (SWP - Backfilling), and supervisors are to ensure procedures are followed
P.P.E.	Yes	Hard Hat, High-Visibility clothing or vest, Safety Boots, Hearing protection in noisy areas, Safety glasses are recommended to protect from dust. Dust masks to be used if there is a high level of airborne particles.

Please be aware that you may need to magnify your view to make the text easier to read.

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For new hazards:

1. Identify appropriate corrective actions.
2. Set a specific date for its completion.
3. Whenever possible, identify and correct the cause as well as the specific problem.
4. Hazard assessments must be reviewed with the site crew during the JHA.


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Hazard Assessment, Analysis and Controls Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Hazard Assessment, Analysis and Controls Program.
- Provide active support for activities associated with the Hazard Assessment, Analysis and Controls Program, including job site audits.
- Review the policy at least annually and approve all revisions. Provide a signature on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure that the Health & Safety Department implements the necessary equipment inspection, purchasing procedures and protocols to support the Program.

Foremen/Supervisors/Managers/Superintendents will:

- Complete appropriate training regarding the identification of job site hazards and implement appropriate controls to ensure worker, visitor, and subcontractor safety.
- Maintain a valid training certification for the Basics of Supervision course from IHSA.
- Complete a pre-job hazard assessment form prior to the project start. Review with the Senior Project Manager.
- Complete an updated hazard assessment monthly or when new conditions occur on the jobsite.
- Ensure workers, visitors and subcontractors are aware of the locations of onsite first aid kits, fire extinguishers, air horns, spill kits and muster points.
- Communicate the hazard assessment and any other information during the JHA when required.
- Encourage all on-site personnel to communicate any hazards that may be identified during normal work activities.
- Take appropriate action to implement controls and record your actions on the hazard assessment form located on SiteDocs.
- Consult with the Health & Safety Department, as required, with regards to developing controls for onsite hazards when required.

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- Ensure all workers are wearing the required personal protective equipment.
- Ensure that workers have the machinery, equipment and/or devices necessary to carry out the work and that all are inspected and in proper working condition.

Subcontractors will:


- Ensure that all related requirements under OHSA and O. Reg. 851 RRO. 1990 and O. Reg. 213/91 Construction Projects and O. Reg. 297/13 Occupational Health and Safety Awareness Training are met by all workers of Subcontractors that work at King Paving & Construction Ltd. jobsites.
- Follow all site guidelines for hazard reporting for all job sites and work locations.
- Ensure that all workers who work as Subcontractors have completed the required training including but not limited to MOL Awareness training for workers, fire extinguishers, WHMIS 2015, Working at Heights, hazard awareness, PPE requirements and maintenance, inspection procedures and other required training depending on the scope of work.
- Ensure that only competent workers are assigned to the job site or work location.
- Provide proof of training for workers assigned to work on the project.

Joint Health & Safety Committee members will:

- Work together with workers and Management to identify job site hazards, exercise appropriate due diligence, and prioritize safety concerns daily.
- Participate in the Hazard Assessment, Analysis and Control Program training as assigned.
- Participate in the monthly job site inspection program to identify hazards and provide suggestions to Management to implement controls.
- Correct any non-compliance on jobsites found during the inspection process.
- JHSC Certification parts I and II for at least one of the worker members.
- Review this policy on an annual basis and make recommendations to improve the Hazard Assessment, Analysis and Control Program.

Workers Will:

- Participate in the Daily JHA meetings and weekly toolbox talks.
- Follow the direction of their supervisor.
- Work in compliance with all legislative requirements, guidelines, and standards.
- Workers are encouraged to offer suggestions/recommendations to reduce risk and develop control measures that are specific to the tasks they are performing.
- Wear the appropriate personal protective equipment and inspect it to ensure it is in good condition.
- Workers are to inspect tools and equipment before use.
- Workers are to report incidents, near misses, injuries, or illnesses to the supervisor immediately.

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Health & Safety Department will:


- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the job sites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with OSHA and the Hazard Assessment, Analysis and Control Program.
- Request, review and approve any Subcontractor's Health & Safety Program prior to performing work for the company.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through safety day, job site visits, toolbox talks or onsite training.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Maintain JHSC certification parts I and II.
- Keep abreast of the updated legislation with regards to Hazard Assessment, Analysis and Control Program standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Record all revisions on the policy in the maintenance and continuous improvement log.

COMMUNICATION/TRAINING/RECORD KEEPING

Training records shall be maintained for workers and subcontractors involved in hazard assessments and control procedures. The records will contain the name of the worker trained, date of training and the signature of the person who conducted the training and expiration date. Training records shall be maintained by the Health & Safety Department.

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

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REFERENCES

Z1000-06 (R2011) Occupational Health and Safety Management

Z1001-13 Occupational Health and Safety training

Z1002-12 Occupational Health and Safety training (Hazard identification and elimination and risk assessment and control)

CSA-ISO 31000-10 Risk Management

CSA-IEC/ISO 31010-10 Risk Management techniques

OHSAS 18001:2007 Occupational Health and Safety Management Systems

HSMS 2-02 Critical Task List

HSMS 3-05 Controls

HSMS 10-01 Investigations and Reporting Policy

HSMS 10-03 Incident Reporting Guide

Risk Assessments (on shared drive and in the resources section on SiteDocs)

Superintendent Pre-Start Hazard Assessment and Emergency Site Plan (SiteDocs)

Daily JHA (SiteDocs)

EVALUATION AND CONTINUOUS IMPROVEMENT

This policy and process for Hazard Assessment, Analysis and Control Program will be reviewed annually jointly by Senior Management and the JHSC.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked on the bottom of the policy and recorded on the document maintenance and tracking log.

Safe Work Practice Policy	Issue Date: December 12, 2017	
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POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, Subcontractors, and visitors. The purpose of this policy is to establish written instructions for safe work practices and all work activities that pose a risk to the health and safety of people undertaking activities for the Company.

SCOPE AND REGULATIONS

This policy pertains to all workers and Management who work for the Company. Both workers and Management are jointly responsible for the development of safe work practices to address detailed processes and work activities.

An effective control measure to eliminate or reduce risks associated with identified hazards is to develop Safe Work Practices (SWP's). A safe work practice should exist where there are activities carrying a health and safety risk (including those stated in legislative requirements), or where an absence of such instruction would adversely affect health and safety performance.

DEFINITIONS

For this policy, the following definitions will be used.

Risk – A risk is the consequence and likelihood of harm occurring when exposed to the hazard.

Safe Work Practices (SWP) – A procedure which describes how work is to be carried out in safe and standardized process. It identifies the risks associated with a specific work task and incorporates the appropriate risk control measures into a generalized sequence of steps for doing the task safely. The SWP includes a description of the equipment used in the work, the standards, or codes to be compiled with and the qualifications and training for the activity.


Work – Any activity or process undertaken by a worker on behalf of the Company.

Worker – A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as a worker, contractor or subcontractor, a worker of a contractor or subcontractors, or a worker of a recruitment company assigned to work for the Company, an apprentice or trainee or a student gaining work experience.

DEVELOPMENT OF THE SAFE WORK PRACTICES

The Health & Safety Department usually identifies the need for a SWP as an administration control measure. SWP's should be developed by workers and Management with hands on experience and knowledge of the tasks. Gaining input from several workers will greatly enhance the usefulness of the procedures.

For some processes or tasks, it may be necessary to seek the input of a person with mechanical and other technical competence. This may be through in-house expertise or an external expert.

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The legislation, Code of Practice, manufacturer's user manual and any relevant Safety Data Sheets must be consulted for safety information included in the SWP. For complex or unusual situations, it is recommended that the Health & Safety Department be consulted during the development of the SWP before the process or task can begin.

The Superintendent/Foreman is responsible for the task or process, must sign off on the SWP after being satisfied that sufficient expertise has been sought in the development of the practice.

Safe work practices are located on SiteDocs under Resources in its own folder and are identified by the letters SWP followed by the name of the practice. They can also be found on the shared drive in the Safety folder, sub-folder Safe Work Practices.

REQUIRED RESOURCES

To effectively implement and manage the safe work practices policy, the following resources are required:

- A list of tasks that are conducted.
- Competent personnel who are experienced in writing policies, practices, and procedures.
- Access to a computer or tablet and cell phone.
- Access to the SiteDocs app.
- Time to speak with foremen and workers and to observe tasks being performed on site.
- PPE is required for the site or location where the safe work practice is being observed.
- Completed Risk Assessments


PRIORITIES FOR THE DEVELOPMENT OF SAFE WORK PRACTICES

Given the enormous number of tasks that are carried out in the Company, it will be necessary to prioritize the task for which SWP's need to be written. The following is an example of the order that could be followed:

- New task/processes/equipment where there are medium to high risks.
- Existing tasks where there are high risks.
- Existing tasks where there are medium risks.
- Existing or new tasks where training is required.
- Existing tasks that are low risk are carried out by a large number of workers.
- Existing tasks that are low risk are carried out frequently.

SAFE WORK PRACTICES SHOULD INCLUDE

- The author of the SWP.
- The title of the SWP and a basic description of the activity (i.e., using a drill) or a process (i.e., decanting a hazardous substance).

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- A list of potential hazards and controls as identified during a risk assessment including specific precautions required. Include title and location or link to the associated risk management document.
- Any resources required to perform that task including job sites, chemicals and personal protective equipment and clothing to be worn.
- Requirements from legislation, standards, codes of practice, and manufacturer's information used in the development of the SWP.
- Clear step by step instructions for completing the task in a safe manner.
- Emergency procedures for how to deal with fires, spills, or exposure to hazardous substances while completing the process where applicable.
- A list of applicable regulations
- A completed risk assessment which will be referenced in the safe work practice
- Normal operating clean-up and waste disposal requirements.
- A list of the competency and training required by those carrying out the task or process (e.g., qualifications, certifications, licensing, etc.).
- Person or position that has Supervisory responsibility for the activity or process and the person that has responsibility to review the SWP.

USE OF SAFE WORK PRACTICES

The SWP should be displayed prominently in the jobsite trailers and work locations or equipment where practical. All SWP's should be readily accessible by people who undertake the activity or process.

USE OF MANUFACTURER'S MANUALS AS A SAFE WORK PRACTICE

As the manufacturer's manual may not contain all the information required to qualify as a SWP, manufacturer's manuals or instructions alone cannot be used as a SWP.


Manufacturer's manuals can be listed and used as reference points for any questions in addition to the step-by-step instructions in the SWP.

REVIEW OF SAFE WORK PRACTICES

SWP's should be reviewed when new information becomes available (i.e., legislative changes), an incident has occurred, the work environment has changed, equipment has been modified and at a frequency determined based on the risk.

TRAINING

Workers must be trained in the SWP and be deemed competent in that activity. Training provision, competency assessment and recordkeeping must comply with the Health & Safety training program and the New Hire

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Orientation procedures. Where there have been changes to jobsites or processes, a review of the SWP and training/competency of users must be undertaken.

Evaluation of the Safe Work Practices will be completed through job worker observations, worker interviews and random surveys. Results will be reviewed by the JHSC and Senior Management to determine any gaps and develop a plan for improvement. Acknowledgement for training competency will be recorded on SiteDocs.

Training records shall be maintained for workers and subcontractors involved in hazard assessments and control procedures. The records will contain the name of the worker trained, date of training and the signature of the person who conducted the training and expiry date. Training records shall be maintained by the Health & Safety Department.


Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual Health & Safety Day

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Safe Work Practices Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Safe Work Practices Program.
- Provide active support for activities associated with the Safe Work Practice Program including job site audits.
- Review the policy at least annually and approve all alterations. Signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure that the Health & Safety Department implements the necessary equipment inspection, purchasing procedures and protocols to support the Program.

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Foremen/Supervisors/Managers/Superintendents will:

- Complete appropriate training regarding the safe work practices to ensure worker, visitor, and subcontractor safety.
- Maintain a valid training certification for the Basics of Supervision (BOS) from IHSA.
- Ensure workers, visitors and subcontractors are aware of the locations of the safe work practices on the jobsite or work locations.
- Complete field communication of the SWP and the worker's competency completing the task.
- Consult with the Health & Safety Department as required regarding developing changes to the SWP's as required based on controls for onsite hazards when required (refer to the priorities for the development of SWP's).

Subcontractors will:

- Ensure that their workers have access to SWP's for any process, equipment, or task they complete on our jobsites.
- Ensure that only competent workers are assigned to the job site or work location.
- Provide proof of training for workers assigned to work on the project.

Workers will:


- Complete training in safe work practices as required.
- Participate in the development of SWP with management.
- Follow the guidelines listed in the SWP.
- Report to your immediate Supervisor about any deficiencies with the SWP.

Joint Health & Safety Committee members will:

- Work together with workers and Senior Management to create, review and update SWP's as required.
- Participate in the monthly jobsite inspection program to ensure SWP's are available to the workers and that they are deemed competent for the tasks and processes they are completing.
- Correct any non-compliance on jobsites found during the inspection process.
- Review the policy on an annual basis and make recommendations to improve the Safe Work Practices Program.

Health & Safety Department will:

- Ensure that the Program and relevant operating practices are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with OSHA and the Safe Work Practice Program.
- Provide feedback to Senior Management at safety meetings on program compliance.

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- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continue understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through the annual Health & Safety Day, job site visits, toolbox talks or onsite training.
- Complete risk assessments for safe work practices
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation regarding the Safe Work Practice Program standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Record any revisions on the policy maintenance and continuous improvement log.

REFERENCES

IHSA Construction Health & Safety Manual 2017 Edition

Workplace Safety and Insurance Act, 1997, S.O. 1997, c. 16 Sched. A

Z1002-12 Occupational Health and Safety training (Hazard identification and elimination and risk assessment and control)

O. Reg. 213/91: Construction Projects

R.R.O. 1990, Reg. 851: Industrial Establishments

Risk Assessment for the safe work practice

EVALUATION AND CONTINUOUS IMPROVEMENT

This policy and process for the Safe Work Practice Program will be reviewed annually jointly by Senior Management and JHSC.

The amended policy shall be kept as a record of review and the required changes.

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POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, contractors, and visitors. The purpose of this policy is to establish written and practical instructions for safe work procedures and all work activities that pose a risk to the health and safety of people undertaking activities for the company.

SCOPE AND REGULATIONS

This policy pertains to all workers and management who work for the company. Both workers and Management are jointly responsible for the development of safe job procedures to address detailed processes and work activities.

An effective control measure to eliminate or reduce risks associated with identified hazards is to develop Safe Work Procedures (SWP's) also known as Safe Job Procedures (SJP's).

A safe job procedure is generally written outlining how to perform a task with minimum risk to people, materials, environment, and processes. Safe job procedures are a series of specific steps that guide an employee through a task from start to finish in a chronological order. Safe job procedures are designed to reduce the risk by minimizing potential exposure.

All workers and contractors are charged with the responsibility of following these written and practical instructions.

Work must be performed according to rules and procedures from a variety of sources, included but not limited to the following:


- WSIB
- Occupational Health and Safety Regulations
- Municipal By-laws
- Manufacturer's rules and guidelines for safe use
- Governing bodies for the industry
- Company/Prime Contractor policy

Superintendents/Foremen need to understand the rules and regulations that are directly related to the work being performed and ensure all workers are compliant.

The applicable rules and regulations must be included in all SJP, training must be provided to the workers and they must be aware they are required to comply.

DEFINITIONS

For this policy, the following definitions will be used:

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Risk – A risk is the consequence and likelihood of harm occurring when exposed to the hazard.

Safe Job Procedures (SJP) – Also known as a Safe Work Procedure (SWP), it is a procedure which describes how work is to be carried out in safe and standardized process. It identifies the risks associated with a specific work task and incorporates the appropriate risk control measures into a detailed sequence of steps for doing the task safely. The SWP or SJP includes a description of the equipment used in the work, the standards, or codes to be complied with and the qualifications and training in the activity.

Work – Any activity or process undertaken by an employee on behalf of the company.

Worker – A person is an employee if the person carries out work in any capacity for a person conducting a business or undertaking, including work as an employee, contractor or subcontractor, an employee of a contractor or subcontractor, or an employee of a recruitment company assigned to work for the company, an apprentice or trainee or a student gaining work experience.

DEVELOPMENT OF THE SAFE JOB PROCEDURES

SJP's must be developed by workers and Management with hands on experience and knowledge of the tasks. Gaining input from several workers will greatly enhance the usefulness of the procedures.

Safe Job Procedures are usually developed by Management and workers because of a hazard assessment, an accident investigation and/or as a supplement to a safe job practice.

For some processes or tasks, it may be necessary to seek the input of a person with mechanical and other technical competence. This may be through in-house expertise or an external expert.

The legislation, Code of Practice, manufacturer's user manual and any relevant Safety Data Sheets may be consulted for safety information included in the SJP.

For complex or unusual situations, it is recommended that the Health & Safety Department be consulted during the development of the SJP.


Due to the diversity and complexity of the construction industry, general job procedures as well as specific job procedures will be developed to provide both the general requirements of the work force and the specific requirements of the projects.

Safe work procedures are located on SiteDocs under Resources in its own folder and are identified by the letters SWP followed by the name of the procedure. They can also be found on the shared drive in the Safety folder, sub-folder Safe Work Procedures.

REQUIRED RESOURCES

To effectively implement and manage the safe work procedures policy, the following resources are required:

- A list of tasks that are conducted.
- Competent personnel who are experienced in writing policies, practices, and procedures.

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- Access to a computer or tablet and cell phone.
- Access to the SiteDocs app.
- Time to speak with foremen and workers and to observe tasks being performed on site.
- PPE that is required for the site or location where the safe work practice is being observed.
- Completed risk assessments for each safe work procedure.

PRIORITIES FOR THE DEVELOPMENT OF SJP'S

Safe Job Procedures are usually developed by management and workers because of a hazard assessment, accident investigation and/or as a supplement to a safe job procedure.

Safe Job Procedures must be developed and documented for critical tasks (high priority) identified in COR Element #2 Critical Task List and other activities/operations that the company performs.

This may be conducted through a Job Hazard Analysis. The job should be broken down according to the following steps:

Step 1: A breakdown of critical job/task into a sequence of steps or sub-tasks to determine how it is done.

Step 2: Identification of potential hazards for each sub task, is there a potential for exposure to gases or vapours, slip/trip/fall hazards, overhead hazards, lighting inadequacies, inclement weather, or sources of noise.


Step 3: Determination and implementation of control measures for the identified hazards prior to starting or resuming work.

Step 4: Complete a risk assessment for the task

Step 5: Development of a safe job procedure based on the breakdown of steps so the job tasks can be completed safely from start to finish.

Developing the SJP is a straightforward process consisting of several steps:

1. Understand the scope of the work to be done.
2. Conduct a hazard assessment to identify the hazards.
3. Understand the rules and procedures governing each task, the work is being performed safely, and the noted hazards are being controlled.
4. Combine the information together in a SJP.
5. Train all applicable workers on the SJP.
6. Monitor the effectiveness of the SJP by getting feedback from workers and management.
7. Complete revision of the SJP as required.

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SCOPE OF WORK

Superintendents/Foremen are to ensure they fully understand the scope of work prior to starting the project. For example, they are required to review all applicable drawings and make note of any materials or equipment they require to complete the work. The pre-job start checklist and hazard assessment form is required to be completed once the job has been accepted.

These assessments will assist the Project Managers and Superintendents with the development of site-specific safe job procedures. Not completing or completely understanding the importance of the work requirements may expose workers to possible risks which can be reasonably controlled.

Other trades may work in close proximity during the different stages of work and must also be protected from exposure of hazards.

Superintendents/Foremen need to anticipate that the work zone will have to be shared with other trades. Coordination of controls will need to be taken into consideration to ensure a safe work area for all trades.

USE OF SAFE JOB PROCEDURES

The SJP should be located on the company share drive and in the safety binders. These safety binders will be in the jobsite trailers or with the site Foreman.

All SJP's should be readily accessible by people who undertake the activity or process.

USE OF MANUFACTURER'S MANUALS AS SAFE JOB PROCEDURES

As the manufacturer's manual may not contain all the information required to qualify as an SJP. Manufacturer's manuals or instructions alone cannot be used as an SJP.


Manufacturer's manuals can be listed and used as reference points for any questions in addition to the step-by-step instructions in the SJP.

REVIEW OF SAFE JOB PROCEDURES

SJP's should be reviewed when new information becomes available (e.g., legislative changes, an incident has occurred, the work environment has changed, and equipment has been modified and at a frequency determined based on the risk).

TRAINING

Workers must be trained in the SJP and be deemed competent in that activity. Training provision, competency assessment and recordkeeping must comply with the Health & Safety training program and the New Hire Orientation procedures. Where there have been changes to jobsites or processes, a review of the SJP and training/competency of users must be undertaken.

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Evaluation of the Safe Job Procedures will be completed through the job worker observations, employee interviews and random surveys. Results will be reviewed by the JHSC and management to determine any gaps and develop a plan for improvement. Acknowledgement for training competency will be recorded on SiteDocs.

Safe Job Procedures are included in the "worker orientation" program. All workers will be made aware that safe job procedures have been established, are in effect, are written down and must be followed.

Training records shall be maintained for workers and subcontractors involved in hazard assessments and control procedures using the SiteDocs form. The records will contain the name of the worker trained, date of training and the signature of the person who conducted the training and expiry date. Training records shall be maintained by the Health & Safety Department.

COMMUNICATION


Managers/Foremen/Superintendents/Supervisors and workers will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Online training
- Annual safety day

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Safe Job Procedure Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Safe Job Procedure Program.
- Provide active support for activities associated with the Safe Job Procedure Program including jobsite audits.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure that the Health & Safety Department implements the necessary equipment inspection, purchasing procedures and protocols to support the Program.

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Foremen/Supervisors/Managers/Superintendents will:

- Complete appropriate training regarding the safe job procedures to ensure worker, visitor, and subcontractor safety.
- Maintain a valid training certification for the Basics of Supervision (BOS) from IHSA.
- Ensure workers, visitors and subcontractors are aware of the locations of the safe job procedures on the jobsite or work locations.
- Complete field communication of the SJP and the worker's competency completing the task.
- Consult with the Health & Safety Department as required with regards to developing changes to the SJP's as required based on controls for onsite hazards when required (refer to the priorities for the development of SJP's).
- Complete the required pre-job start checklist and hazard assessment prior to commencing work.

Subcontractors will:

- Ensure that their workers have access to SJP's for any process, equipment, or task they complete on our jobsites.
- Ensure that only competent workers are assigned to the job site or work location.
- Provide proof of training for workers assigned to work on the project.

Workers will:


- Complete training on safe job procedures as required.
- Participate in the development of SJP.
- Follow the guidelines listed in the SJP.
- Report to your immediate Supervisor about any deficiencies with the SJP.

Joint Health & Safety Committee members will:

- Work together with workers and Management to create, review and update SJP's as required.
- Participate in the monthly jobsite inspection program to ensure SJP's are available to the workers, and they are deemed competent for the tasks and processes they are completing.
- Correct any non-compliance on jobsites found during the inspection process.
- Review the policy on an annual basis and make recommendations to improve the Safe Job Procedure Program.

Health & Safety Department will:

- Ensure that the Program and relevant operating practices are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with OSHA and the Safe Job Procedure Program.

Safe Job Procedure Policy	Issue Date: December 12, 2017	
	Revision Date: January 27, 2025	
Policy Number: HSMS 3-02	Revision Number: 008	
	_____ <i>Approved By: President</i>	

- Provide feedback to management at safety meetings on program compliance.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through safety day, jobsite visits, toolbox talks or onsite training.
- Review and advice on the audit results and findings.
- Complete risk assessments for each task being analyzed.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to Safe Job Procedure standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Record any revisions on the policy maintenance and continuous improvement log.

REFERENCES

IHSA Construction Health and Safety Manual 2017 Edition

Workplace Safety and Insurance Act, 1997, S.O. 1997, c. 16, Sched. A

Z1002-12 Occupational Health and Safety Training (Hazard Identification and Elimination and Risk Assessment and Control)

O. Reg. 213/91: Construction Projects



R.R.O. 1990, Reg. 851: Industrial Establishments

Risk assessment for the particular task

EVALUATION AND CONTINUOUS IMPROVEMENT

This policy and process for the Safe Job Procedure Program will be reviewed annually by Senior Management and the JHSC.

The amended policy shall be kept as a record of review and the required changes.

Controls	Issue Date: June 12, 2023	
	Revision Date: January 28, 2025	
Policy Number: HSMS 3-05	Revision Number: 003	
	 Approved By: President	

POLICY STATEMENT

At King Paving & Construction Ltd. the prevention and effective management of emergency situations can assist in minimizing the negative impact of an unexpected event. The company will therefore ensure that all workplace hazards are controlled in a timely manner. Participation from varying positions within the company will participate in the development and review of controls.

Hazard identification and risk assessments are processes used to identify and evaluate existing and potential hazards on a worksite and the methods used to control or eliminate the hazards identified. This procedure will describe the identification, development, and implementation of controls.

This procedure works in conjunction with HSMS 2-01 Hazard Assessment, Analysis and Control, HSMS 3-01 Safe Work Practices Policy, HSMS 3-02 Safe Job Procedures, HSMS 3-03 Workplace Hazard Corrective Action Assessment – Head Office and HSMS 3-04 Workplace Hazard Corrective Action Assessment – Field.

The assessment process must be completed prior to the start of all jobs to identify existing or potential hazards to workers; eliminate or control these hazards using engineering or administrative controls, proper training and/or using personal protective equipment. The information gathered during the assessment is to be communicated to all personnel who are assigned to a site on their first day prior to the start of work.

SCOPE AND REGULATIONS

This policy pertains to all workers, visitors, subcontractors, and service providers, at all construction sites, where King Paving & Construction Ltd. conducts business.

All parties are required to take a proactive approach to identifying, reporting, and managing hazards in the workplace.

When they observe a hazard, they are required to take steps to manage that hazard directly (provided they are adequately knowledgeable/trained to safely do so); eliminate the hazard or get assistance from appropriate people to do so, whenever reasonably possible.

Where hazards cannot be eliminated immediately, take necessary steps to warn others of the hazard. Report hazardous or potentially hazardous conditions and acts to a supervisor or your supervisor or site contact, if working as a sub-contractor.


Reference O. Reg 213/91 25(2)(h)

DEFINITIONS

For this policy, the following definitions will be used.

Competent Person – As per the Ontario Occupational Health and Safety Act, a competent person is a person who:

- Is qualified because of knowledge, training, and experience to perform the work,
- Is familiar with the Occupational Health and Safety Act and the provisions that apply to the work, and
- Has knowledge of all potential and actual danger to health or safety in the work.

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Harm – Physical injury or damage to health.

Hazard – A source of potential harm to people or a situation with potential to cause injury or loss to the plant, property, and equipment. Hazards can be grouped as physical, chemical, ergonomic, biological or psychological.

Hazardous Event – An immediate event or event that is extended over a period of time that can cause harm.

Hazardous Situation – A circumstance in which a person is exposed to a hazard or multiple hazards.

Hazard Control – The process of implementing measures to reduce the risk associated with a hazard.

Hazard Identification – The process of identifying all situations or events that could give rise to injury, illness or damage to equipment or property.

Health – Refers to the physical and psychological health of a worker.

Incident – Work related event(s) in which an injury or ill health (regardless of severity) or fatality occurred or could have occurred.

Probability – The likelihood of an event occurring.

Procedure – A documented method for carrying out an activity.

Process – A set of interrelated or interacting activities.

Qualitative and Quantitative Assessments – Defines the result or consequence, probability or occurrences and level of risk by using the terms such as “high”, “medium” or “low”.

Risk – Is the consequence or result of exposure to a hazard.

Risk Assessment – Is a systematic process of evaluating the potential risks that may be involved in an activity or task. The result of the assessment is the development of the risk rating.


Risk Analysis – The part of the assessment that contributes to the development of an understanding of all risks. All risk assessment tools contain methods of measuring or evaluating the potential risks.

Supervisor – Person who has charge of a workplace or authority over another worker.

Visitor – A person who is not employed by the Company. This person may be a salesperson, trainer, client, or someone who may have an interest in the operations.

Worker – Means any of the following, but does not include an inmate of a correctional institution or like institution or facility who participated inside the institution or facility in a work project or rehabilitation program:

- A person who performs work or supplies services for monetary compensation.
- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school board.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied area and technology, university, or other post-secondary institution.

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- A person who receives training from an employer, but who under the "Employment Standard Act, 2000" is not a worker for the purposes for that Act because of the condition set out in subsection 1(2) of that Act have been met.
- Such other person as may be prescribed who perform work or supply services to an employer for no monetary compensation.

Worker Safety Representative – Worker member of the JHSC or a Health & Safety representative as defined in the OSHA.


PREREQUISITES

To ensure full compliance with element 3.2 of the 2020 version of the COR audit, the following items are required:

- All roles and responsibilities must be clearly defined in writing. These roles and responsibilities are listed in the responsibilities section of this procedure.
- Senior management is required to approve all controls. As new controls are developed, the JHSC and senior management will review the controls to ensure that the best possible control measures will be implemented. The safety department will add the new controls to the existing applicable policy or procedure or create a new policy or procedure if required. All updated controls, policies or procedures will be reviewed and approved by the president of the company, signed, and dated, and added to the health & safety program.
- Requirement for involvement of appropriate competent workplace parties such as workers, supervisors, maintenance, engineering, and suppliers in the hazard assessment process. Competent workers, supervisors, maintenance, engineering, and suppliers will be involved in the hazard assessment process as it pertains to the work being performed and the equipment that is to be used or operated. As part of the daily JHA meetings and weekly toolbox talk meetings, all superintendents, foremen and workers are encouraged to make recommendations based on their observations and experience performing their tasks and based on equipment and tools that they may use. The same holds true for estimators, engineers, maintenance personnel and subcontractors. Any recommendations, corrective actions or notable participation will be listed on the SiteDocs form that is pertinent to the type of meeting that has taken place.
- When a hazardous condition is identified, corrective actions will be promptly implemented in a timely manner according to the hazard. The following list highlights preferred methods of control in descending order:
 - Elimination:** Remove the hazard or hazardous situation whenever possible.
 - Substitution:** Substitute the hazardous product or element with a less hazardous option.
 - Engineering:** Implement engineering designs and control measures whenever reasonably practical.
 - Administrative:** Implement safe work policies, procedures, and practices to ensure the hazardous element is controlled adequately.
 - Personal Protective Equipment (PPE):** Implement adequate PPE to ensure the hazardous condition does not affect exposed workers.

Examples of the above are as follows:


- Elimination:** An opening in the ground creates a situation where a worker could fall in. Placing and securing a cover over the hole will eliminate the hazard.

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2. Substitution: A skid steer with a bucket attachment is being used to move pallets. Substituting fork attachments rather than the bucket will control the hazard because the forks can fully enter the pallet, thereby securing the load.
 3. Engineering: Using an engineered trench box will protect a worker from a trench collapse.
 4. Administrative: When a hazard exists, or an incident has occurred, a new procedure may be written that specifically addresses the hazard in the work and the process thereof. New procedures are communicated to all personnel via toolbox talks.
 5. Personal Protective Equipment: Selecting the appropriate P.P.E. as listed on a safety data sheet when using chemicals will protect a worker from the specific hazards of that chemical.
- e) Legal requirements and associated standards and guidelines must be considered while conducting all hazard assessments and when formulating controls. Legal and other requirements are initially determined by the estimating department as they pertain to the job that is being quoted. King Paving & Construction has the applicable legislation, guidelines and standards listed in each policy, procedure, and practice as it pertains to the specific tasks that will be performed on the job. All superintendents and foremen are to observe all work to ensure that all work conducted on King sites meets these legislative requirements, guidelines, and standards. Supervisors and the health & safety department will utilize the manufacturer's instructions, recommendations, and guidelines as they will greatly reduce risks and aid in controlling hazards.
- f) Specific forms are used for documenting controls. Prior to the start of a project, the site superintendent will conduct a Pre-Start Hazard Assessment and develop an emergency site plan. The document and checklist that is used is entitled "Superintendent Pre-Start Hazard Assessment and Emergency Site Plan" which is located on SiteDocs. Daily JHA meetings, weekly toolbox talks, incident report forms, near miss forms and incident/accident investigation reports also have sections for controls to be documented and subsequently uploaded to SiteDocs. Supervisors and JHSC members have been instructed to utilize the "Action Item" sections of these forms as SiteDocs will then automatically send an action item email to the pertinent people involved and will allow for accurate follow up and measurement of the effectiveness of the controls that were put in place. In Addition, Risk Assessment forms are completed based on specific tasks and their subtasks. The completed risk assessment forms are identified by the letters RA, followed by the name of the task being assessed. Examples are RA – Backfilling, and RA – Confined Spaces. The completed risk assessment forms are stored on the company shared drive in the safety folder in the risk assessments subfolder.
- g) King Paving & Construction will communicate control measures to affected work parties. This will be accomplished through daily JHA meetings, toolbox talks, email, and in some cases, during the annual safety day. It is usually the foremen who conduct the daily JHA meeting with their crews. Crew members will sign the form on SiteDocs as proof that they participated in the meeting. The same holds true for weekly toolbox talks.
- h) All control measures must be readily available at the point of use as required. The control measures are listed for each selected task on the daily JHA meeting form located on SiteDocs. All documents and records are maintained as per the procedure HSMS 1-03 Document and Record Control.

COMPETENCIES

The following is a list of competencies that are required by personnel who conduct hazard assessments:

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Superintendents, Managers and Foremen: For a superintendent, manager, or foreman to be considered competent to conduct hazard assessments, he/she must have received training in at least one of the following:

- IHSA Basics of Supervision (BOS)
- Supervisor Due Diligence or equivalent
- JHSC Certification Parts I and II
- IHSA Hazard Recognition, Analysis and Control

Health & Safety Personnel: Health & safety personnel include health & safety officers, health & safety coordinators and Joint Health & Safety Committee members. Health & safety personnel must have received training in at least one of the following training courses to be considered competent to conduct hazard and risk assessments:

- JHSC Certification Parts I and II
- IHSA Hazard Recognition, Analysis and Control

Proof of Competency: King Paving and Construction will institute an observation and evaluation program regarding equipment operators and other positions in which there are not clear regulations that require official training. The purpose of this is to ensure that our operators and other personnel are working safely and following all safe work procedures, standards, guidelines and recommendations. People in these positions will be formally observed and evaluated on an annual basis. A checklist for the observation and evaluation will be developed to meet this need.


REQUIRED RESOURCES

To effectively implement the hazard assessment, analysis and control policy and procedures, the following resources are required:

- Personnel that meet the competency requirements listed in the competencies section above.
- Access to the SiteDocs app for all personnel involved in completing hazard assessments.
- Review and signature(s) from management and/or the safety department.
- A significant amount of time per assessment.
- Access to the company shared drive and the safety folders therein.
- Access to a computer, tablet, or cell phone.
- Access to the photocopier and scanner.
- On occasion, time discussing the tasks with workers and foremen.
- P.P.E. that is required for the site or location.
- Access to all risk assessments stored on SiteDocs.
- Access to all safe work practices and procedures located on the shared drive.
- Access to all incident reports, first aid reports, near miss reports and accident investigations.

IDENTIFYING, DEVELOPING, AND IMPLEMENTING CONTROLS

Controls are measures used to eliminate or reduce actual or potential risks to health and safety of workers based on the tasks that they will be performing.

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The identification of risks is crucial to the development of controls that will be the most effective in protecting workers from harm and exposure to hazardous situations.


The following is a list of how controls can be identified:

- 1) **Incident and near miss reports:** When an incident or near miss occurs, the person filling out and submitting the report (to SiteDocs) will state what risks or hazards were observed, or potentially be the cause of the incident, accident or near miss. Once the possible causes have been determined, the foreman will speak with the parties involved and recommend methods to control the hazard. This may be through communication with superintendents, workers, equipment operators, site safety representatives, the JHSC representatives and the safety department. The information gained through these discussions will be used to identify possible controls which will be assigned as "action items" on the SiteDocs form.

The person(s) responsible for the action item will be alerted via email and are required to develop and implement the action item. This may also be in conjunction with the safety department. Once the control measure has been identified and assigned, SiteDocs will track the status of the control and allow for documented follow-up as to the effectiveness of the control.

Accident investigation forms are also used to develop controls because the analysis of the potential causes is more in-depth. Controls are also assigned as action items on the accident investigation form, implemented and tracked.

- 2) **Hazard Assessments:** Hazard assessments are conducted through the Superintendent Pre-Start Hazard Assessment and Emergency Site Plan, Daily Job Hazard Analysis meetings, weekly Toolbox Talks, and through the specific task risk assessments that have been developed by the safety department and listed in the risk assessment section located on SiteDocs. Control measures have been developed for the risks associated with the common tasks performed at our sites. These control measures are clearly stated on the SiteDocs report forms (as listed above) and are communicated to all personnel via the daily JHA meetings and weekly toolbox talks. A section has been added to these forms that asks, "what can be done to make the job safer?". This allows for the participation of all personnel, and gives the opportunity for workers to make recommendations, which in turn can introduce more specific control measures based on the work performed by the crew. Please refer to HSMS 2-01 Hazard Assessment, Analysis and Control for more information and the process for conducting hazard assessments.
- 3) **JHSC, Senior Management and Annual Safety Reviews:** As part of the King Paving & Construction health and safety management system, quarterly JHSC and senior management meetings are held. During these meetings, incident reports, accident reports, first aid reports and the monthly statistical analysis are discussed along with methods of improving the overall safety of our work environment. These methods can also be considered as control measures that can be introduced throughout the company or for specific forms of work.
- 4) **Annual Policy and Procedure Review:** Throughout the first quarter of each year, the health & safety department reviews and updates all safety policies, practices, and procedures from the health & safety program manual and the safe work procedure and practice files. This presents an opportunity to identify possible control measures. When this is the case, the safety department will communicate with the JHSC and

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superintendents, which allows them to participate more fully in the occupational health and safety management system while also allowing them to make recommendations to improve our control measures. As the policies, practices and procedures are updated, they are reviewed by the president of the company, approved, and implemented in the new (current year) health & safety program. Any significant changes are communicated to all personnel during the annual safety day and/or through toolbox talks.

HAZARD ASSESSMENTS

A hazard assessment must be completed prior to the project start by King Paving & Construction Ltd., monthly or whenever site conditions change significantly. Hazard assessments may also include completing or reviewing the specific risk assessment forms based on tasks performed by King Paving & Construction personnel.

Hazard assessments will be reviewed, and updated as necessary, at every Toolbox talk throughout the duration of the project.


A risk assessment is a careful analysis of all potential hazards associated with the entire jobsite. It is a process where a "team" effort is required. The designated person will fill in the tasks to be completed, along with the priority ranking, hazards, and the controls to be instituted.

Once hazards are identified and assessed, it is necessary to develop formal controls for workplace parties to follow to ensure their safety. Please refer to "HSMS 2-01 Hazard Assessment, Analysis and Controls" for the specific procedures used to identify, develop, and implement hazard controls. King Paving has developed a new risk assessment form that utilizes a 5X5 risk matrix to identify the likeliness of an incident occurring, and its potential impact. The risk for each task, and subtasks are rated, and hazards are listed. Controls are then developed, and the task(s) are re-rated. This aids in showing the effectiveness of the controls that have been put in place.

Following the risk matrix (on the same form), human factors are considered based on the task being performed, and a section following the hierarchy of controls is filled out. This section identifies which of the control methods can be implemented, and what specific controls will be utilized. A detailed description of the risk assessment process and form are included in the Hazard Assessment section of this procedure. A sample of a completed risk assessment is also included.

RISK ASSESSMENTS AND CRITICAL TASK THRESHOLDS:

The risk assessment form is colour-coded and rates each task and subtask as to the likeliness of an incident occurring, and the potential impact should an incident occur. Both the likeliness and the impact are rated from 1 to 5 as follows:

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		Impact →				
		Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
Likelihood ↑	Almost Certain (>1 in 10) 5	Medium 5	High 10	Extreme 15	Catastrophic 20	Catastrophic 25
	Likely (1 in 20) 4	Low 4	Medium 8	High 12	Extreme 16	Catastrophic 20
	Occasional (1 in 200) 3	Low 3	Medium 6	High 9	High 12	Extreme 15
	Unlikely (1 in 2000) 2	Very Low 2	Low 4	Medium 6	Medium 6	High 10
	Rare (<1 in 10000) 1	Very Low 1	Very Low 2	Low 3	Low 4	Medium 5

The determination of whether the task is to be considered as critical is based on the pre-control risk rating. King Paving & Construction has set a pre-control threshold value of 20, which will show in the red section of the matrix.

The colour coding for risk ratings is as follows:

Very Low: Ratings from 1 to 3 show as dark green. Priority Low – Attend to within 90 days

Low: Ratings from 4 to 5 show as light green, Priority Low – Attend to within 90 days

Medium: Ratings from 6 to 8 show as yellow. Priority Medium – Attend to within 30 days

High: Ratings from 9 to 12 show as orange. Priority High – Immediate Attention Required

Extreme: Rating from 15 to 16 show as dark orange. Priority High – Immediate Attention Required.

Catastrophic: Ratings from 20 to 25 show as red. Priority High – Immediate Attention Required

The likeliness and impact are rated numerically from 1 to 5. The values given for likelihood and impact are multiplied to give the risk rating for the task and subtasks. The risk rating is completed


If any one of the subtasks receives a **pre-control** risk rating of 20 or higher (Red), the overall task is deemed to be critical and will be **identified as a critical task on the risk assessment form.**

IMPORTANT NOTE: If any one of the subtasks receives a **post-control** risk rating of 20 or higher, the task must **not be conducted** until such time as new controls can be put in place to lower the post-control risk rating to under 20.

A full description of the risk assessment matrix is found in the hazard assessment section of this procedure.

A full list of critical tasks based on the completed risk assessments is included in HSMS 2-02 Critical Task List. Examples of critical tasks include, but are not limited to the following:

- Confined Space
- Backfilling
- Working at Heights
- Excavation sites
- Work involving high voltage, or buried utilities

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- Working over or around water
- Working with hazardous materials (asbestos, silica, etc.)
- Working with or around large heavy machinery and equipment
- Large material lifting task

It is the Senior Project Manager and site Superintendent's responsibility to ensure that required inspections and forms have been completed, all provincial legislation and code requirements have been completed and made readily available for review during critical task activities on the job sites.

PRE-JOB HAZARD ASSESSMENT SAFETY PLANNING PROCEDURE

A pre-job start-up meeting is an important chance for the people in charge of a project to review and plan procedures, facilities, timelines, etc., including a full review of health and safety compliance to be in effect.


Superintendent Pre-Start Hazard Assessments & Emergency Site Plan (Document review of the following):

- Hazard assessments, particularly for tasks or areas that tend to involve frequent and/or severe injuries, and for tasks that are new to the jobsite, recently changed, or seldom performed.
- Timing and frequency of on-site inspections, by who and type of inspection.
- Special safety risks due to specialized equipment, environmental or weather conditions, site conditions, etc.
- Special safety items that must be installed, rented, or purchased in advance due to special work activities.
- A list of special equipment needed to ensure safety in all tasks, including PPE for all workers, and an inventory of its availability for all workers who will need it. Methods and/or checklists for PPE distribution, and for the tracking of all safety equipment, shall be established with the assistance of the Health & Safety Department.
- First aid procedures that must be followed for the job site and specific first aid information, such as nearest hospital, shall be created and posted at the job site.
- Security measures needed, including site requirements for public, worker, property, equipment, and tool protection.
- Accident reporting procedures. Ensure that all levels of supervision are aware of reporting requirements. All Company forms are available on SiteDocs.
- Additional site-specific worker training, site orientation, etc., may be required for job sites. Ensure workers have the required proof of training that may be required to accompany the workers on the jobsites.
- Review any subcontractor's prequalification packages that may be required to perform work on the jobsites. Subcontractors must be approved by the Company prior to performing work on the job site.

HAZARD ASSESSMENTS

A hazard assessment must be completed prior to the project start by King Paving & Construction Ltd., monthly or whenever site conditions change significantly.

Hazard assessments will be reviewed, and updated as necessary, at every toolbox talk throughout the duration of the project.

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A hazard assessment is a careful analysis of all potential hazards associated with the entire job site. It is a process where a "team" effort is required. The designated person will fill in the tasks to be completed, along with the priority ranking, hazards, and the controls to be instituted.

Hazard Priority Ranking

(the rankings estimate the severity of the problem if a potential accident were to occur)

Identification and Storage of Risk Assessment Forms: All risk assessment forms are identified by the letters RA, followed by the overall task name. For example, RA – Backfilling, or RA – Confined Spaces.

All completed risk assessment forms are stored on the company shared drive in the safety folder in the subfolder "Risk Assessments".

The completed risk assessment forms are also stored in the resources section on SiteDocs.

All tasks conducted at King Paving & Construction are rated as to the likelihood of an incident occurring, and the potential impact of the incident. Below is a description of the likelihood and impact rating system:


Likelihood (Probability) Rating

The likelihood, or probability, of a risk refers to the chance of the risk event occurring. The definitions for the rating scale may be qualitative, quantitative, or a combination of both and should be customized based on the types of risk events being analyzed. For example, natural disaster events may occur at rates of months to millennia, while risk events at a construction site might occur at rates of hours to days or years.

Below is an example of a 5-point rating scale for the likelihood axis, along with some examples of different types of qualitative and quantitative definitions.

5-Point Rating Scale for the Likelihood Axis

Rating	Label	Description	Probability	Frequency	Rate	Example
1	Rare	Very rare or highly unlikely	<0.01%	≤1 in 10,000	Once per Century	Possible, but hasn't been observed anywhere yet
2	Unlikely	Could occur at some time	0.1% - 1%	1 in 2,000	Once per Decade	Has not occurred here, but has been observed elsewhere
3	Occasional	Might occur occasionally	1% - 20%	1 in 200	Once per Year	Has occurred at least once
4	Likely	Likely to occur often	20% - 95%	1 in 20	Once per Month	Has occurred occasionally (annually)

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Rating	Label	Description	Probability	Frequency	Rate	Example
5	Almost Certain	Expected under most conditions	>95%	≥1 in 10	Once per Week	Has occurred frequently (multiple times per year or even weekly/daily)

Impact (Severity) Rating


The horizontal axis of the risk assessment matrix measures the **Consequence, Impact** or **Severity** of the risk *if it does occur*. These three terms are used synonymously, so King Paving & Construction has opted to use the term "Impact".

When rating the impact or severity to rate just a single occurrence of the failure or event, not the overall impact of all events. For example, you can ask "If this failure does occur, how severe is the consequence of a single occurrence? Is the consequence Insignificant, Minor, Moderate, Major, or Catastrophic?"

The rating scale below provides a few examples.

Example: 5-Point Rating Scale for the Impact Axis

Impact Rating	Impact	Operational Effect	Financial Effect	Injury	Pain Level
1 - Insignificant	Minimal or no impact	Negligible delay (<1 day)	Minimal financial effect	Annoyance-level injury at most	0 Pain
2 - Minor	Low impact	Minor operational delay (a few days)	Acceptable financial setback	Injury may require non-professional first aid	1-2 Pain
3 - Moderate	Noticeable impact	Significant project delay (a few weeks)	Moderate financial loss	Injury may require professional treatment	3-6 Pain
4 - Major	Significant impact	Widespread project disruption (a year or more)	Large financial loss	Hospitalization	7-9 Pain

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Impact Rating	Impact	Operational Effect	Financial Effect	Injury	Pain Level
5 - Catastrophic	Critical impact	Project failure or cancellation	Severe financial damage	Death or permanent disability	10 Pain

Below is a completed risk assessment for backfilling:

Risk Assessment Template

TASK: Backfilling



FORM RA-Backfilling




#	Task	Pre-Controls	Pre-Controls Likelihood	Pre-Controls Impact	Pre-Controls Score	Controls	Post-Controls Likelihood	Post-Controls Impact	Post-Controls Score
1	Inspect equipment to ensure loading devices, lifts, ladders and tags	Operator required, vehicle must be clean, check capacity with manufacturer, sign out the device	2	3	6	Inspect all equipment with a certified operator and operator. Check for safety devices and signs, ensure good condition. Verify the manufacturer's rated load capacity is appropriate for the task and age.	2	3	6
2	Verify the work area, check grades and slope	Operator should be trained and certified. Provide signs or barriers for safety. Use operator's judgement to determine what to do when the equipment is not in the operator's field of view. Define the work area to be used.	4	4	16	Ensure the work area is clear and free from obstructions. Check the ground conditions and slope conditions before starting work. Use warning signs and barriers to define the work area. Ensure the ground is not unstable or too steep for the equipment to be used.	2	3	6
3	Verify the equipment is in good condition	Operator must be trained for equipment. Provide good training. The operator must be certified. The operator must be trained on the use of the equipment. Define the work area to be used.	2	4	8	Inspect the equipment and ground conditions. Use a lift device that is appropriate for the task. Provide training for the operator. Check the operator's certification and training records. Check the operator's knowledge of the equipment. Check the operator's ability to use the equipment safely. Check the operator's ability to use the equipment in the work area.	2	3	6
4	Ensure the operator is trained	Operator should be trained and certified. Provide signs or barriers for safety. Use operator's judgement to determine what to do when the equipment is not in the operator's field of view. Define the work area to be used.	4	3	12	Check the operator's training records. Check the operator's certification and training records. Check the operator's knowledge of the equipment. Check the operator's ability to use the equipment safely. Check the operator's ability to use the equipment in the work area.	2	3	6
5	Establish a safe work area	Operator should be trained and certified. Provide signs or barriers for safety. Use operator's judgement to determine what to do when the equipment is not in the operator's field of view. Define the work area to be used.	4	2	8	Check the work area for obstructions. Check the ground conditions. Check the operator's judgement. Check the operator's ability to use the equipment safely. Check the operator's ability to use the equipment in the work area.	2	3	6
6	Verify the operator is trained and that the work area is safe	Operator should be trained and certified. Provide signs or barriers for safety. Use operator's judgement to determine what to do when the equipment is not in the operator's field of view. Define the work area to be used.	2	4	8	Check the operator's training records. Check the operator's certification and training records. Check the operator's knowledge of the equipment. Check the operator's ability to use the equipment safely. Check the operator's ability to use the equipment in the work area.	2	3	6
7	Control the equipment operator's speed	Operator should be trained and certified. Provide signs or barriers for safety. Use operator's judgement to determine what to do when the equipment is not in the operator's field of view. Define the work area to be used.	2	3	6	Use the operator's judgement. Check the operator's ability to use the equipment safely. Check the operator's ability to use the equipment in the work area.	2	3	6

CRITICAL TASK THRESHOLD: IF ANY OF THE PRE-CONTROL RISK SCORES EXCEED 20, THE TASK IS CONSIDERED TO BE A CRITICAL TASK

CRITICAL TASK: YES

HUMAN FACTORS: Standing for long periods of time. Possible poor posture. Dehydration on hot days. Workers need to be protected from the sun. Workers may also need to use bug repellent to protect them from ticks. Constant loud noise can cause communication errors and lead to fatigue.

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HIERARCHY OF CONTROLS	IMPLEMENTATION POSSIBLE?	CONTROL MEASURES
ELIMINATION	No	
SUBSTITUTION	No	
ENGINEERING	No	
ADMINISTRATION	Yes	Workers are to follow the safe work procedure for backfilling (SWP - Backfilling), and supervisors are to ensure procedures are followed.
P.P.E.	Yes	Hard Hat, High Visibility clothing or vest, Safety Boots, Hearing protection in noisy areas. Safety glasses are recommended to protect from dust. Dust masks to be used if there is a high level of airborne particles.

Please be aware that you may need to magnify your view to make the text easier to read.

For new hazards:

1. Identify appropriate corrective actions.
2. Set a specific date for its completion.
3. Whenever possible, identify and correct the cause as well as the specific problem.
4. Hazard assessments must be reviewed with the site crew during the JHA.

IDENTIFICATION OF CRITICAL TASKS

A critical task is one that may include the following factors:


- Jobs with a high frequency of accidents or near misses which pose a significant threat to health and safety.
- Jobs that have the potential to produce fatalities, disabling injuries, illnesses, or environmental harm.
- Newly established jobs whose hazards may not be evident because of lack of experience.
- Jobs that are to be performed in hazardous and/or unfamiliar environments. (i.e., confined spaces, restricted access, excavations, heavy equipment, elevated work surfaces, and unfamiliar work sites).

COMMUNICATION/TRAINING/RECORD KEEPING

Training records shall be maintained for workers and subcontractors involved in hazard assessments and control procedures. The records will contain the name of the worker trained, date of training and the signature of the person who conducted the training and expiration date. Training records shall be maintained by the Health & Safety Department.

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks

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- Company emails
- Annual safety day

Daily JHA meetings and weekly toolbox talks will discuss the control measures that are in place for the tasks to be performed, and all workers sign the SiteDocs form as acknowledgement that they participated in the meeting and that they understand the information (including control measures) that have been discussed.


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Controls Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Controls Program.
- Provide active support for activities associated with the Controls Program, including job site audits.
- Review the policy at least annually and approve all revisions. Provide a signature on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure that the Health & Safety Department implements the necessary equipment inspection, purchasing procedures and protocols to support the Program.

Foremen/Supervisors/Managers/Superintendents will:

- Complete appropriate training regarding the identification of job site hazards and implement appropriate controls to ensure worker, visitor, and subcontractor safety.
- Maintain a valid training certificate for the Basics of Supervision course from IHSA.
- Complete a pre-job hazard assessment form prior to the project start. Review with the Project Managers.
- Complete an updated hazard assessment monthly or when new conditions occur on the jobsite.
- Review completed risk assessments and communicate pertinent information to the workers.
- Aid in completing risk assessments and communicating recommendations to the health and safety department.
- Ensure workers, visitors and subcontractors are aware of the locations of onsite first aid kits, fire extinguishers, air horns, spill kits and muster points.
- Communicate the hazard assessment and controls during the JHA when required.
- Communicate any changes, corrective actions, preventative actions, and any new controls that have been formulated with workers during daily JHA meetings and follow-up meetings after an incident or near miss has occurred.
- Encourage all on-site personnel to communicate any hazards that may be identified during normal work activities.
- Take appropriate action to implement controls and record your actions on the hazard assessment form located on SiteDocs.
- Consult with the Health & Safety Department, as required, with regards to developing controls for onsite hazards when required.
- Ensure all workers are wearing the required personal protective equipment.

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- Ensure that workers have the machinery, equipment and/or devices necessary to carry out the work and are inspected for proper working conditions.

Subcontractors will:


- Ensure that all related requirements under OHSA and O. Reg. 851 RRO. 1990 and O. Reg. 213/91 Construction Projects and O. Reg. 297/13 Occupational Health and Safety Awareness Training are met by all workers of Subcontractors that work at King Paving & Construction Ltd. jobsites.
- Follow all site guidelines for hazard reporting for all job sites and work locations.
- Ensure that all workers who work as subcontractors have completed the required training including but not limited to MOL Awareness training for workers, fire extinguishers, WHMIS 2015, Working at Heights, hazard awareness, PPE requirements and maintenance, inspection procedures and other required training depending on the scope of work.
- Take part in the daily JHA meeting for the days that they will be on site and discuss control measures regarding the work that the subcontractor will be conducting.
- Take part in the King Paving & Construction safety orientation prior to performing any work on our sites.
- Ensure that only competent workers are assigned to the job site or work location.
- Provide proof of training for workers assigned to work on the project.

Joint Health & Safety Committee members will:

- Work together with workers and management to identify job site hazards, exercise appropriate due diligence, and prioritize safety concerns daily.
- Participate in the Controls Program training as assigned.
- Participate in the monthly job site inspection program to identify hazards and provide suggestions to Management to implement controls.
- Correct any non-compliance on jobsites found during the inspection process.
- Make recommendations regarding the identification, development, and implementation of controls.
- Review this policy on an annual basis and make recommendations to improve the Hazard Assessment, Analysis and Control Program.
- Maintain JHSC certification where required.

Workers Will:

- Participate in the daily JHA meetings and weekly toolbox talks.
- Follow the direction of their supervisor.
- Communicate any suggestions or make recommendations regarding the identification, development, and implementation of controls.
- Work in compliance with all legislative requirements, guidelines, and standards.
- Workers are encouraged to offer suggestions/recommendations to reduce risk and develop control measures that are specific to the tasks they are performing.
- Wear the appropriate P.P.E. and ensure it is in good condition.

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- Workers are to inspect tools and equipment before use.
- Workers are to report incidents, near misses, injuries, or illnesses to the supervisor immediately as per HSMS 10-01.
- Worker JHSC representatives are to maintain JHSC certification where required.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the job sites or workplace.
- Communicate the requirements of the program and associated procedures with all relevant parties.
- Complete formal field audits to ensure compliance with OHSA and the Controls Program.
- Request, review and approve any Subcontractor's Health & Safety Program prior to performing work for the company.
- Ensure that the requirements of the program are periodically embedded in safety forums to confirm a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through safety day, job site visits, toolbox talks or onsite training.
- Review and advise on the audit results and findings.
- Review all incident, accident, near miss and first aid reports and formulate control measures to reduce risks.
- Communicate control measures with all personnel through safety day and toolbox talks.
- Assist in revisions to the program, as required.
- Keep abreast of the updated legislation with regards to Hazard Assessment, Analysis and Control Program standards through industry education.
- Update the policy on an annual basis with Senior Management and the JHSC.
- Maintain JHSC Certification.
- Record all revisions on the policy in the maintenance and continuous improvement log.

REFERENCES

Z1000-06 (R2011) Occupational Health and Safety Management

Z1001-13 Occupational Health and Safety training

Z1002-12 Occupational Health and Safety training (Hazard identification and elimination and risk assessment and control)


CSA-ISO 31000-10 Risk Management

CSA-IEC/ISO 31010-10 Risk Management techniques

OHSAS 18001:2007 Occupational Health and Safety Management Systems

HSMS 2-01 Hazard Assessment, Analysis and Control

HSMS 2-02 Critical Task List

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HSMS 3-01 Safe Work Practices Policy

HSMS 3-02 Safe Job Procedures Policy

HSMS 3-03 Workplace Hazard Corrective Assessment – Office

HSMS 3-04 Workplace Hazard Corrective Action Assessment – Field Operations

HSMS 10-01 Investigations and Reporting Policy

HSMS 10-03 Incident Reporting Guide


Completed Risk Assessments per task

SiteDocs Hazard Assessments

Superintendent Pre-Start Hazard Assessment and Emergency Site Plan (SiteDocs)

Daily JHA (SiteDocs)

EVALUATION AND CONTINUOUS IMPROVEMENT

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POLICY STATEMENT

King Paving & Construction Ltd. is committed to the selection of health & safety focused subcontractors and service providers. Based on our belief in the Internal Responsibility System and that all workplace parties must work together and do their part in achieving a healthy & safe workplace, we have developed health and safety criteria to help select, monitor and evaluate our subcontractors and service providers.

Meeting the criteria should give an indication of the subcontractor's ability and competence to assess and control health & safety hazards resulting from work done by the subcontractor or by King Paving & Construction Ltd. Meeting the criteria will also play a role in the continuity of business with the subcontractor or service provider.

King Paving & Construction Ltd. will maintain open and ongoing communication with subcontractors and service providers, especially when there is a change that will affect the health and safety of the workers.

This policy/procedure works in conjunction with HSMS 14-04 – Management of Change.

SCOPE

This policy applies to all subcontractors and their employees who perform the work on behalf of King Paving & Construction Ltd.

DEFINITIONS

Company Safety Goals – Company safety goals will be established for the current business year. These goals will be communicated to the subcontractor upon their arrival on site as part of the Subcontractor Safety Orientation.

Competent Person (OHSA) – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance
- Is familiar with the Act and the regulations that apply to the work
- Has knowledge of any potential or actual danger to health and safety in the workplace


Constructor – Means a person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by him or herself or by more than one employer.

Employer – A person who employs one or more workers or contracts for the services of one or more workers; includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with the owner, constructor, contractor, or subcontractor, to perform work or supply services.

Ensure – Take every reasonable precaution to achieve the stated objective.

Supervisor – Person who has charge of a workplace or authority over another worker.

Subcontractor – A subcontractor is a person or firm that has a contract to do part of a job which another firm is responsible for.

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Worker – Means any of the following, but does not include an inmate of a correctional institution or like institution or facility who participated inside the institution or facility in a work project or rehabilitation program:

- A person who performs work or supplies services for monetary compensation.
- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school board.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, or other post-secondary institution.
- A person who receives training from an employer, but who under the "Employment Standard Act, 2000" is not an employee for the purposes for that Act because of the condition set out in subsection 1(2) of that Act have been met.
- Such other person as may be prescribed who perform work or supply services to an employer for no monetary compensation.

Worker Safety Representative – Worker member of the JHSC or a Health & Safety representative as defined in the OHSA.

Workplace Investigation – Is an impartial information gathering process that can be conducted by an external investigator. It is used to establish the facts and circumstances relating to a complaint or grievance. Investigations into misconduct issues can also be conducted.

Principal Contractor – A person who is appointed to manage, coordinate and/or implement work or service in a contract and/or a Subcontractor.

Contractor – A person or Company including Subcontractors or independent contractors who are engaged by King Paving & Construction Ltd. to perform work or carry out a service.


Short Term Contractor – A contractor hired to carry out a specific task in a short period of time. (e.g., electrical repairs, tire repairs, plumbing repairs completed in a few hours or a day).

Long Term Contractor – Contractors who are engaged on a full time or regular basis to carry out work or service on behalf of the Company. The work or service to be completed in a period greater than one day.

Designated Substance – Includes a biological, chemical, or physical agent or combination thereof prescribed as a designated substance to which the exposure of a worker is prohibited, regulated, restricted, limited or controlled.

Owner – Includes a trustee, receiver, mortgagee in possession, tenant, lessee, or occupier of any lands or premises used or to be used as a workplace, and a person who acts for or on behalf of an owner as an agent or delegate.

Prescribed – Means prescribed by a regulation made under an Act.

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Construction – Includes the erection, alteration, repair, dismantling, demolition, structural boring, drilling, blasting, or concreting, the installation of any machinery or plant, and any work or undertaking in connection with a project but does not include any work or undertaking underground in a mine.

Constructor – Means a person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by him or herself or by more than one employer.

Project – Means a construction project, whether public or private including:

- The construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipeline, duct or well, or any combination thereof,
- The moving of a building or structure, and
- Any work or undertaking, on any lands or appurtenances used in connection with construction.


PREREQUISITES

The following prerequisites are required in order to comply with element 4.2 of the COR audit system.

- a) Roles and responsibilities of all relevant parties are clearly listed in the responsibilities section of this procedure.
- b) Contractors and service providers are to complete a hazard assessment as per COR element 2 – Hazard Assessment, Analysis and Control (HSMS 2-01); and Element 3 – Controls (HSMS 3-05) and HSMS 14-04 Management of Change. Contractors and service providers will conduct a hazard assessment based on the tasks that they will be performing on site and communicate the results of their assessment with the King Paving & Construction site superintendent. The control measures will be communicated during the daily JHA meeting which the contractor must attend for the days that they will be on site. By doing so, all personnel on site will have a better understanding regarding the potential hazards, and the specific controls used to eliminate or reduce the risks.
- c) The Occupational Health and Safety criteria for selecting, monitoring, and evaluating contractor/service providers includes:
 - i. The ability and competency of the contractor to be able to assess, analyze and control hazards that arise from their own work that may impact King Paving & Construction's workers.
 - ii. The ability and competency of the contractor to be able to assess, analyze and control hazards arising from King Paving & Construction's work that may impact the contractor's workers.

King Paving & Construction will use COR certified contractors and service providers whenever it is possible and affordable to do so. This will ensure that the criteria listed above will be achieved.

In cases where the contractor or service provider is not currently COR certified, preference will be given to selecting contractors and service providers that are either enrolled and actively seeking COR

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certification or have a well-developed and accepted occupational health and management system which includes the procedures for conducting workplace hazard assessments and developing control measures.

From time to time, King Paving & Construction may select a contractor that, due to their nature, does not have a well-developed occupational health and management system (i.e., small subcontractors, one person jobs, etc.). When this is the case, the subcontractor will work with the KPC site superintendent and foreman to conduct a hazard assessment together (following HSMS 2-01 - Hazard Assessment and Controls and HSMS 3-05 – Controls) and develop controls prior to beginning their work.

- d) Communication will take place with all relevant workplace parties when there are changes that affect the health and safety of the work and/or workers. When King Paving & Construction or their subcontractors change the scope of the work or tasks to be performed on a project that affects the health and safety of the work, the new changes, hazard assessment and controls will be communicated with all parties on site via a site safety meeting, daily JHA, or toolbox talk.
- e) King Paving & Construction will lead the coordination of their site-specific occupational health and safety on multi-employer workplaces. The site superintendent will coordinate the work and ensure that adequate hazard assessments have been completed, and control measures are in place. This information will be communicated to site personnel via JHA meetings and toolbox talks. The foremen will monitor the contractors and other employers on the site to ensure that all personnel on site are following procedures and working in accordance with the regulations, standards, guidelines and the applicable policies and procedures.
- f) King Paving & Construction has developed and maintains specific forms for evaluating contractors and service providers. The form is titled Subcontractor Review and is located on the company shared drive in the subcontractor information file folder.
- g) All controls must be readily available at the point of use.
- h) All personnel, including contractors and service providers are required to follow the controls as set forth by King Paving & Construction.
- i) Both management and workers are required to participate in the development and review of controls.
- j) All documents and records are maintained as per procedure HSMS 1-03 – Document and Record Control.

RESOURCES REQUIRED:

- WSIB Reports (Contractor's Health and Safety Performance Records).
- Adequate liability insurance as per the requirements of the contract.
- Form 1000's
- Proof of Training records
- Job Hazard Analysis for tasks to be performed.
- Proof of participation in the King Paving & Construction Safety Orientation.
- Subcontractor Health & Safety Agreement HSMS 4-02A.
- Annual certification and maintenance records for supplied equipment (i.e., rental equipment).

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- Operator's manuals for equipment being purchased or rented,
- PPE as per the manufacturer's requirements and site requirements.
- Pertinent information from the Occupational Health and Safety Act, Regulations, guidelines, and standards that apply to the equipment to be operated and/or tasks to be conducted.
- Safety Data Sheets for any potentially hazardous products that will be brought to the site.
- Engineers design drawings and approvals (where required).
- Specialized training in new equipment where required.
- Adequate fire extinguishers when required.

PROCEDURES

Prior to a subcontractor performing work on any King Paving & Construction site, the subcontractor must submit the documentation listed below in the Tier 1 and Tier 2 sections to the health & safety coordinator for approval. Once the documentation has been received and approved, the subcontractor will be allowed on site to complete the items listed in Tier 3.

Upon completion of the work, and at least annually, the subcontractor review form will be filled out for King Paving & Construction to better track the safety record and overall performance of the subcontractor. This information may be used when selecting subcontractors for future projects.

Below is a list of the documentation and communication that is required (Subcontractor Pre-Qualification Process):

Step 1 **WSIB Clearance/Insurance**


- Confirm WSIB clearance and General Insurance Requirements
- Review WSIB Compass Report
- Senior Management must approve prior to any work commencing

Step 2 **Complete Subcontractor Prequalification**

- Review: All training records, subcontractor form, verify declaration signatures and position in company, trade licenses and other required site-specific documents

Step 3 **Onsite Monitoring of Safety Compliance**

- Complete on-site orientation and safety requirements

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- Complete on-site audits for compliance
- Complete verbal and written communication for non-compliance

Step 4 Annual Safety Performance Review

- Health & Safety Manager to complete annual safety performance report.
- Senior Management to review each subcontractor's safety performance.
- Validate each subcontractor for continued work contracts

Contractor Review and Communication:

Communication will take place between King Paving and the subcontractor and any changes to process, procedures or control measures will be discussed.

Contractors will be monitored while on site by the superintendents and/or the foremen. Communication will be logged during the daily JHA meeting.

This information, along with all information listed above in steps 1 through 4 will be entered into the Contractor Review Matrix which is stored on the shared drive (Safety/subcontractor information/subcontractor review). This information may be used during the selection process to determine which subcontractor meets our requirements and will be the best for the project. The matrix is filled out throughout the year and is completed during the 4th quarter as part of our overall subcontractor review.


RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Procurement and Contractor Management Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Procurement and Contractor Management Program.
- Provide active support for activities associated with the Procurement and Contractor Management Program.
- Review the policy at least annually and approve all alterations. Signature is required on the policy as proof of approval.
- Senior Management will review deficiencies and take actions to correct identified deficiencies.
- Participate in the review of subcontractor performance and make recommendations.

Foremen/Supervisors/Managers/Superintendents will:

- Communicate objectives, duties, and responsibilities of the program to subcontractors and their

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employees during the orientation process.

- Communicate any specific requirements (i.e., communicating the client's Drug & Alcohol Policy) of the hiring client during the subcontractor orientation.
- Ensure that the required procedures are carried out at all operational levels.
- Ensure that subcontractors and their employees wear the required PPE for the scope of work being performed.
- Ensure that all subcontractors and their employees report injuries to the onsite management.
- Report all incidents involving subcontractors to the hiring client (if requested) and will participate in all incident investigations.
- Ensure that all subcontractors and their employees comply with the OSHA and other legislative requirements.
- Ensure that subcontractors and/or their employees attend any required safety meetings.
- Ensure that subcontractors have developed and supplied hazard assessments for their work or have actively participated in the King Paving & Construction daily JHA meetings and shared their control measures with King personnel.
- Identify any areas of non-compliance for the Safety Program and take the necessary requirements to ensure compliance.
- Ensure contractors and subcontractors sign the safety orientation checklist.
- Monitor work activities and document substandard acts/practices.
- Correct non-compliance issues.
- Complete mandatory post-job performance reviews.

Subcontractors will:

The following rules are for your protection while working at this company and are a condition of employment. Failure to comply will result in disciplinary action, up to and including termination.

- Complete and provide the Subcontractor's Package to the company health & safety coordinator for approval prior to job start. This package requires the subcontractor to provide: a signed Health & Safety Agreement, a Form 1000 (where applicable), a WSIB Clearance Certificate, a Certificate of Insurance, training records and, SDS for controlled products brought on-site (where applicable).
- If your company does not have a Health & Safety Manual/Program, you will abide by that of King Paving & Construction Ltd.
- Provide qualified and competent workers to perform all work activities.
- Abide by the Occupational Health and Safety Act, Regulations and applicable codes and standards.
- Assess, analyze, and control hazards that arise from their own work that may impact King Paving & Construction's workers.
- Assess, analyze, and control hazards arising from King Paving & Construction's work that may impact the contractor's workers.
- Ensure employees do not use King Paving & Construction Ltd. assets without prior authorization.
- Do not interfere with the company's work processes without prior authorization.

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- Ensure all employees use and wear all required personal protective equipment.
- Always follow emergency procedures.
- Report hazards, absences, or defective equipment to the company.
- Provide trained first aiders as per Reg. 1101 requirements.
- Always maintain personal hygiene practices.
- Removal of company property will result in termination of the contract.
- Ensure employees smoke in approved designated areas only.
- Only complete hot work that has been approved by the Company contact.
- Understand that all incidents **MUST** be reported to King Paving & Construction Ltd.
- Be included in pre-job meetings and/or hazard assessments.
- Be responsible for ensuring compliance with OHSA.
- Ensure that workers perform pre-use inspection of equipment and tools.
- Provide a jobsite free of workplace violence, harassment, bullying and mobbing.

Subcontractor's Employees will:

- If your company does not have a Health & Safety Manual/Program, you will abide by that of King Paving & Construction Ltd.
- Report all accidents, incidents, near misses and injuries to the onsite supervisor or company contact.
- Participate in incident investigations (when applicable).
- NOT operate equipment unless properly trained.
- Ensure any loose clothing and jewelry is tucked or confined.
- Wear CSA approved safety footwear, eyewear, head protection and safety vest on the jobsites.
- Ensure that operators are the only individuals allowed on mobile equipment or moving vehicles.
- Wear fall protection and be trained in fall protection when required.
- Remain in your location until further notice in the event of a power failure.
- Maintain a clean work area and ensure the safety of all workers.
- Not engage in horseplay.
- Always maintain personal hygiene practices.
- Be removed and banned from the jobsite if found to be under the influence of illicit drugs or alcohol or found to have the same in their possession.
- Comply with the company's cell phone policy.
- Refrain from workplace violence, harassment, bullying, and mobbing on the jobsite.

Health & Safety Department will:

- Complete the subcontractor prequalification and any follow up required with the company representative.
- Through WSIB Compass, we review all incident/injury statistics during prequalification.
- Complete site audits to verify compliance with the subcontractor program.

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- Provide injury status reports to senior management for review.
- Verify training certification for subcontractors' employment & their employees.
- Assist site management and subcontractor for any non-compliance issues.
- Ensure that the requirements of the program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated through toolbox talks.
- Review and advise on the interpretation of the results and findings of all program-related assessment activities.
- Assist in revisions to the program, as required.
- Keep abreast of the updated legislation regarding changes in the regulations for both industrial and construction sectors through industry education.
- Be responsible for updating the policy on an annual basis.

COMMUNICATION/TRAINING/RECORD KEEPING

Training records shall be maintained for workers and subcontractors involved in hazard assessments and control procedures. The records will contain the name of the worker trained, date of training and the signature of the person who conducted the training and expiration date. Training records shall be maintained by the Health & Safety Department.


Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

REFERENCES

Z1000-06 (R2011) Occupational Health and Safety Management

Z1001-13 Occupational Health and Safety training

Procurement and Contractor Management	Issue Date: January 31, 2016	
	Revision Date: January 28, 2025	
Policy Number: HSMS 4-01	Revision Number: 010	
	<hr/> <i>Approved By: President</i>	

Z1002-12 Occupational Health and Safety training (Hazard identification and elimination and risk assessment and control)

CSA-ISO 31000-10 Risk Management

CSA-IEC/ISO 31010-10 Risk Management techniques

OHSAS 18001:2007 Occupational Health and Safety Management Systems

HSMS 2-01 Hazard Assessment, Analysis and Control

HSMS 3-01 Safe Work Practices

HSMS 3-02 Safe Work Procedures

HSMS 3-05 Controls

HSMS 4-02A Subcontractor Health & Safety Agreement

HSMS 10-01 Investigations and Reporting Policy

HSMS 10-03 Incident Reporting Guide

HSMS 14-04 Management of Change

WSIB Form 1000, Clearance Reports, Compass Reports

SiteDocs Hazard Assessments



Superintendent Pre-Start Hazard Assessment and Emergency Site Plan (SiteDocs)

Daily JHA (SiteDocs)

Subcontractor Health & Safety Agreement

Subcontractor Review

H&S Only Site Inspection

Subcontractor Rules and Regulations	Issue Date: January 31, 2016	
	Revision Date: January 28, 2025	
Policy Number: HSMS 4-02	Revision Number: 009	
	 Approved By: President	

POLICY STATEMENT

King Paving & Construction Ltd. has set a minimum standard for all those that work in a subcontract capacity. This procedure is to ensure that all subcontractors comply with OHSA, King's Health & Safety Program, legislative and other requirements as well as reduce the potential for harm to employees, prevent property damage and loss.

Safety standards will be enforced with all Subcontractors up to and including removal from the jobsite for non-compliance.

SCOPE

This policy applies to all Subcontractors and their employees who perform work on behalf of King Paving & Construction Ltd.

DEFINITIONS

Company Safety Goals – Company safety goals will be established for the current business year. These goals will be communicated to the Subcontractor upon their arrival on site as part of the Subcontractor Safety Orientation.

Competent Person (OHSA) – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge to any potential or actual danger to health and safety in the workplace.

Constructor – Means a person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by him or herself or by more than one employer.

Employer – A person who employs one or more worker or contracts for the services of one or more workers; includes a Contractor or Subcontractor who performs work or supplies services and a Contractor or Subcontractor who undertakes with the owner, constructor, Contractor or Subcontractor, to perform work or supply services.


Ensure – Take every reasonable precaution to achieve the stated objective.

Supervisor – Person who has charge of a workplace or authority over another worker.

Subcontractor – A subcontractor is a person or firm that has a contract to do part of a job which another firm is responsible for.

Worker – Means any of the following, but does not include an inmate of a correctional institution or like institution or facility who participated inside the institution or facility in a work project or rehabilitation program:

- A person who performs work or supplies services for monetary compensation.

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- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school board.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, or other post-secondary institution.
- A person who receives training from an employer, but who under the "Employment Standard Act, 2000" is not an employee for the purposes for that Act because of the condition set out in subsection 1(2) of that Act have been met.
- Such other person as may be prescribed who perform work or supply services to an employer for no monetary compensation.

Worker Safety Representative – Worker member of the JHSC or a Health & Safety representative as defined in the OHSA.

Workplace Investigation – Is an impartial information gathering process that can be conducted by an external investigator. It is used to establish the facts and circumstances relating to a complaint or grievance. Investigations into misconduct issues can also be conducted.

Principal Contractor – A person who is appointed to manage, coordinate and/or implement work or service in a contract and/or a Subcontractor.

Contractor – A person or Company including Subcontractors or independent contractors who are engaged by King Paving & Construction Ltd. to perform work or carry out a service.

Short Term Contractor – A contractor hired to carry out a specific task in a short period of time. (e.g., electrical repairs, tire repairs, plumbing repairs completed in a few hours or a day).

Long Term Contractor – Contractors who are engaged on a full time or regular basis to carry out work or service on behalf of the Company. The work or service to be completed in a period greater than one day.


Designated Substance – Includes a biological, chemical, or physical agent or combination thereof prescribed as a designated substance to which the exposure of a worker is prohibited, regulated, restricted, limited or controlled.

Owner – Includes a trustee, receiver, mortgagee in possession, tenant, lessee, or occupier of any lands or premises used or to be used as a workplace, and a person who acts for or on behalf of an owner as an agent or delegate.

Prescribed – Means prescribed by a regulation made under an Act.

Construction – Includes the erection, alteration, repair, dismantling, demolition, structural boring, drilling, blasting, or concreting, the installation of any machinery or plant, and any work or undertaking in connection with a project but does not include any work or undertaking underground in a mine.

Constructor – Means a person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by him or herself or by more than one employer.

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Project – Means a construction project, whether public or private including:

- The construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipeline, duct or well, or any combination thereof,
- The moving of a building or structure, and
- Any work or undertaking, on any lands or appurtenances used in connection with construction.


PREREQUISITES

The following prerequisites are required to comply with element 4.2 of the COR audit system.

- a) Roles and responsibilities of all relevant parties are clearly listed in the responsibilities section of this procedure.
- b) Contractors and service providers are to complete a hazard assessment as per COR element 2 – Hazard Assessment, Analysis, and Control; and Element 3 – Controls.
- c) The Occupational Health and Safety criteria for selecting, monitoring, and evaluating contractor/service providers includes:
 - i. The ability and competency of the contractor to be able to assess, analyze and control hazards that arise from their own work that may impact King Paving & Construction's workers.
 - ii. The ability and competency of the contractor to be able to assess, analyze and control hazards arising from King Paving & Construction's work that may impact the contractor's workers.
- d) Communication will take place with all relevant workplace parties when there are changes that affect the health and safety of the work and workers.
- e) King Paving & Construction will lead the coordination of site-specific occupational health and safety on multi-employer workplaces.
- f) King Paving & Construction will develop and maintain specific forms for evaluating contractors and service providers.
- g) All controls must be readily available at the point of use.
- h) All personnel including contractors and service providers are required to follow the controls as set forth by King Paving & Construction.
- i) Both management and workers are required to participate in the development and review of controls.
- j) All documents and records are maintained as per procedure HSMS 1-03 – Document and Record Control.

RESOURCES REQUIRED

- All information and documentation as listed below for tiers 1-4.

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- Subcontractor evaluation documentation.
- Hazard Analysis for the tasks being performed by the subcontractor and/or proof that the subcontractor has participated in the daily JHA meetings at the site.

PROCEDURES

SUBCONTRACTOR PREQUALIFICATION PROCESS

Tier 1 **WSIB Clearance/Insurance**

- Confirm WSIB clearance and General Insurance Requirements
- Review WSIB Compass Report
- Senior Management must approve prior to any work commencing

Tier 2 **Complete Subcontractor Prequalification**

- Review: All training records, subcontractor form, verify declaration signatures and position in company, trade licenses and other required site-specific documents

Tier 3 **Onsite Monitoring of Safety Compliance**

- Complete on-site orientation and safety requirements
- Complete on-site audits for compliance
- Complete verbal and written communication for non-compliance


Tier 4 **Annual Safety Performance Review**

- Health & Safety Manager to complete annual safety performance report
- Senior Management to review each Subcontractor safety performance
- Validate each Subcontractor for continued work contracts

RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Subcontractor Program.

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- Allocate appropriate resources, training, and employees to implement and maintain the Subcontractor Program.
- Provide active support for activities associated with the Subcontractor Program.
- Review the Policy at least annually and approve all alterations. Signature is required on the Policy as proof of approval.
- Senior Management will review deficiencies and take actions to correct identified deficiencies.
- Participate in the review of Subcontractor performance and make recommendations.


Foremen/Supervisors/Managers/Superintendents will:

- Communicate objectives, duties, and responsibilities of the Program to Subcontractors and their employees during the orientation process.
- Communicate any specific requirements (i.e., communicating the client's Drug & Alcohol Policy) of the hiring client during the subcontractor orientation.
- Ensure that the required procedures are carried out at all operational levels.
- Ensure that Subcontractors and their employees wear the required PPE for the scope of work being performed.
- Ensure that all Subcontractors and their employees report injuries to the onsite Management.
- Report all incidents involving Subcontractors to the hiring client and will participate in all incident investigations.
- Ensure that all Subcontractors and their employees comply with the OSHA and other legislative requirements.
- Ensure that Subcontractors and/or their employees attend any required safety meetings.
- Identify any areas of non-compliance for the Safety Program and take the necessary requirements to ensure compliance.
- Ensure contractors and Subcontractors sign the safety orientation checklist.
- Monitor work activities and document substandard acts/practices.
- Correct non-compliance issues.
- Complete mandatory post-job performance reviews.
- Ensure contractors and Subcontractors submit a report detailing their methods of safety related training.

Subcontractors will:

The following rules are for your protection while working at this Company and are a condition of employment. Failure to comply will result in disciplinary action, up to and including termination.


- Complete and provide the Subcontractor's package to the Company administrator for approval prior to job start. This package requires the Subcontractor to provide: a signed Health & Safety Agreement, a Form 1000 (where applicable), a WSIB Clearance Certificate, a Certificate of Insurance, training records and, SDS for controlled products brought on-site (where applicable).
- If your company does not have a Health & Safety Manual/Program, you will abide by that of King Paving & Construction Ltd.

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- Provide qualified and competent workers to perform all work activities.
- Abide by the Occupational Health and Safety Act, Regulations and applicable codes and standards.
- Assess, analyze, and control hazards that arise from their own work that may impact King Paving & Construction's workers
- Assess, analyze, and control hazards arising from King Paving & Construction's work that may impact the contractor's workers.
- Ensure employees do not use the King Paving & Construction Ltd. assets without prior authorization.
- Do not interfere with the Company's work processes without prior authorization.
- Ensure all employees use and wear all required personal protective equipment.
- Always follow emergency procedures.
- Report hazards, absences, or defective equipment to the Company.
- Provide trained first aiders as per Reg. 1101 requirements.
- Always maintain personal hygiene practices.
- Removal of Company property will result in termination of the contract.
- Ensure employees smoke in approved designated areas only.
- Only complete hot work that has been approved by the Company contact.
- Understand that all incidents **MUST** be reported to King Paving & Construction Ltd.
- Be included in pre-job meetings and/or hazard assessments.
- Be responsible to ensure compliance with OHSA.
- Ensure that workers perform pre-use inspection of equipment and tools.
- Provide a jobsite free of workplace violence, harassment, bullying and mobbing.

Subcontractor's Employees will:

- If your company does not have a Health & Safety Manual/Program, you will abide by that of King Paving & Construction Ltd.
- Report all accidents, incidents, near misses and injuries to the onsite Supervisor or Company contact.
- Participate in incident investigations (when applicable).
- NOT operate equipment unless properly trained.
- Ensure any loose clothing and jewelry is tucked or confined.
- Wear CSA approved safety footwear, eyewear, head protection and safety vest on the jobsites.
- Ensure that operators are the only individuals allowed on mobile equipment or moving vehicles.
- Wear fall protection and be trained in fall protection when required.
- Remain in your location until further notice in the event of a power failure.
- Maintain a clean work area and ensure the safety of all workers.
- Not engage in horseplay.
- Always maintain personal hygiene practices.
- Be removed and banned from the jobsite if found to be under the influence of illicit drugs or alcohol or found to have the same in their possession.
- Comply with Company's cell phone policy.

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- Refrain from workplace violence, harassment, bullying, and mobbing on the jobsite.

Health & Safety Department will:

- Complete the Subcontractor prequalification and any follow up required with the Company representative.
- Through WSIB Compass review all incident/injury statistics during prequalification.
- Complete site audits to verify compliance with the Subcontractor program.
- Provide injury status reports to Senior Management for review.
- Verify training certification for Subcontractor's employment.
- Assist site management and Subcontractor for any non-compliance issues.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated through toolbox talks.
- Review and advice on the interpretation of the results and findings of all Program related assessment activities.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation regarding changes in the regulations for both industrial and construction sectors through industry education.
- Be responsible for updating the Policy on an annual basis.

EVALUATION AND CONTINUOUS IMPROVEMENT

This policy and process for Subcontractor Rules and Regulations will be reviewed annually jointly by Senior Management and JHSC.

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The amended Policy shall be kept as a record of review and the required changes. The revision of the Policy shall be tracked on the bottom of the Policy and recorded on the document maintenance and tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Updated policy content	Annual review requirements	Dec 8, 2017	001
Update policy	Annual review & company name change	Oct 17, 2019	002
Update policy	Annual review & updated subcontractor responsibilities	Feb 13, 2020	003
Update policy	Annual review & updated subcontractor responsibilities	Jan 11, 2021	004
Update policy Added that subcontracted employees must be trained in fall protection where required	Annual review & updated subcontractor responsibilities	Jan 10, 2022	005
Updated Contractor roles and responsibilities/added prerequisites	Annual review	Jan 6, 2023	006
Updated Policy Added Required Resources	Annual review	Jan 9, 2024	007
Replaced eCompliance for SiteDocs	Change in safety platform	Nov 13, 2024	008
Update Policy	Annual Review & revised policy statement	Jan 28, 2025	009

Company Rules Policy	Issue Date: January 11, 2018	
	Revision Date: January 28, 2025	
Policy Number: HSMS 5-01	Revision Number: 008	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction Ltd. has established Company Rules for all employees to express expectations regarding behaviour towards coworkers, supervisors and the whole company while at work. King Paving & Construction Ltd. has established these Company Rules and expectations for compliance with health & safety, environmental and other regulations. These Company Rules apply to every person at King Paving & Construction Ltd. regardless of their title or duties.

King Paving & Construction Ltd. expects all employees to comply with the Company Rules and will ensure consistent enforcement of these rules through supervisors and management in all work locations. If any employee violates the Company Rules, the Progressive Discipline Policy (HSMS 5-02) and procedure will be applied.

SCOPE AND REGULATIONS

This policy pertains to all employees, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business. The policy will outline the roles and responsibilities that have been established and will be enforced as part of our due diligence.

DEFINITIONS

For this policy, the following definitions will be used:

Company – Means the company to whom the Subcontractor is providing services for. (e.g., King Paving & Construction Ltd.)

Company Property – Means property that is owned, leased, or rented on behalf of King Paving & Construction Ltd. that may be used in the scope of work.


Laws – Mean any municipal, provincial, or federal regulations that must be complied with during business.

Services – Means a service or work performed by a Subcontractor for the company.

Subcontractor – Means a person or company who performs work or provides a service to the company.

Violation – Means any failure of the Company's or Subcontractor's workforce to comply with the Company's rules.

Progressive Discipline – Is a process for dealing with job-related behaviors that does not meet expected and communicated performance standards. The primary purpose of progressive discipline is to assist the employee to understand a performance problem or opportunity for improvement.

Company Rules Policy	Issue Date: January 11, 2018	
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PREREQUISITES

- A) The roles and responsibilities for setting, implementing, and complying with company rules are clearly defined in the roles and responsibilities section of this procedure.
- B) Both standard and location specific rules must be available and easily accessible. Standard company rules are kept in the site trailers and in the foremen's trucks and posted on the safety board in the head office. Site specific rules are posted in the site trailer and made available to the foremen as required.
- C) As per our requirement, the company rules are clearly stated in writing and are visibly posted in all site trailers and in the foreman's safety binder. A copy of the company rules is provided to each employee during the orientation and at each annual safety day.
- D) Company rules are clearly explained to workers in a way that they understand them. This occurs during orientation and on safety day. Workplace specific rules are explained during daily job hazard analysis meetings, contractor orientations and toolbox talks. On safety day, the health & safety officer explains each of the company rules. Typically, approximately 95% of King personnel attend the annual safety day. Workers who are unable to attend safety day will attend a safety orientation prior to starting work. During orientation, the company rules are explained to workers and subcontractors by the health & safety officer or the site superintendent prior to the worker or subcontractor starting work on site.
- E) The company will ensure that company rules are applied and enforced consistently throughout the organization. Managers, supervisors, and safety personnel are to follow HSMS 5-02 – Progressive Discipline Policy. By doing so, this will ensure that company rules, corrective actions, and disciplinary actions are consistent throughout the company.
- F) The company has a written progressive discipline procedure (HSMS 5-02) which is explained to all workers during orientation and during the annual health and safety day.

COMPANY RULES


Mandatory Requirements

- Perform all work in accordance with safe work practices and your supervisor's direction.
- Wear or use the appropriate personal protective equipment (PPE) or clothing and use the appropriate safety devices.
- Maintain good housekeeping in your work area.
- Inspect all tools and equipment in accordance with site rules, regulations, and manufacturer's specifications.
- Report any near misses, unsafe conditions, incidents, and damage (to property or equipment) to your immediate supervisor as soon as you are aware.

Prohibitions

The following are always prohibited on all company property and all company jobsites:

- Possession or consumption of alcohol or illegal drugs

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- Possession of firearms
- Engage in fighting or horseplay
- Unlawful harassment or discrimination
- Theft, vandalism
- Damage, disabling or interfering with safety, firefighting or first aid equipment.
- Reckless or negligent use of company equipment or vehicles including operating vehicles without a valid driver's license.
- Arriving at work or remaining at work when the ability to perform the job safely is impaired.

ROLES AND RESPONSIBILITIES

Senior Management will:


- Assume ultimate responsibility for the development and implementation of an effective Company Rules Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Company Rules Program.
- Provide active support for activities associated with the Company Rules Policy.
- Review the policy at least annually and approve all alterations. Signature is required on this policy as proof of approval.
- Senior management will review deficiencies and take actions to correct identified deficiencies.
- Ensure that the Health & Safety Department implements the necessary tools such as the Progressive Discipline forms to support the program.

Foremen/Supervisors/Managers/Superintendents will:

- Complete appropriate training regarding roles and responsibilities for jobsite compliance.
- Have access and use the company progressive discipline forms when required. Currently, we have disciplinary form booklets available as well as a safety violation form on SiteDocs.
- Foremen must bring all progressive discipline concerns to their immediate Superintendent when progressive discipline is required. Ultimately, the progressive discipline form must be signed by the Superintendent.
- Be consistent in applying the company rules to all workers on the job site including subcontractors and their workers.
- Provide a copy of the progressive discipline form to the employee.
- Consult Senior Management on any termination potential prior to any action being taken.

Subcontractors will:

- Comply with the Company's rules.
- Follow guidelines as outlined in the Subcontractor's Health & Safety Agreement.

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Joint Health & Safety Committee members will:

- Work together with employees and Management to review the Company Rules annually and make recommendations for continued improvements.
- Re-enforce compliance of the Company Rules in the workplace.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Safety Day; Toolbox Talks or onsite training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to OSHA standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JSHC.

TRAINING/RECORD KEEPING

Training records shall be maintained for employees involved in Company Rules training.


The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

Training records shall be maintained by the Health & Safety Department.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails

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- Annual safety day

REFERENCES

OHSA Construction and Industrial Regulations

Company Rules Policy

HSMS – 5-02 Progressive Discipline Policy

Disciplinary Form Booklets


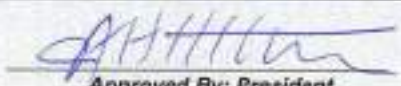
Safety Violation Form on SiteDocs

CONTINUOUS IMPROVEMENT

This policy and process for Company Rules will be reviewed annually and jointly by Senior Management and JHSC.

Legislative updates will be reviewed to ensure the Company Rules meet the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

Progressive Discipline Policy	Issue Date: October 27, 2017	
	Revision Date: January 29, 2025	
Policy Number: HSMS 5-02	Revision Number: 009	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction Ltd. has adopted a policy of Progressive Discipline to ensure that employees have the opportunity to correct any performance or behavioral problems that may arise.

King Paving & Construction Ltd. has established a set of reasonable rules and guidelines for employees to follow. These have not been put in place to restrict the freedom of our employees, but rather they are in consideration of their safety, and the overall protection of King Paving & Construction Ltd.'s employees, property, and our business practices.

SCOPE AND GUIDELINES

This policy applies to all employees that work for King Paving & Construction Ltd.

This policy addresses the following:

- The Progressive Discipline Process
- The Levels of Progressive Discipline
- Investigation and Documentation
- Suspension and Review Period
- Suspension with Pay
- Termination


DEFINITIONS

Performance Management – Is the process through which supervisors and those they lead, gain a shared understanding of work expectations and goals, exchange performance feedback, identify learning and development opportunities, and evaluate performance results.

Collective Agreement – Regulates the terms and conditions of employees in their workplace, their duties, and the duties of the employer. It is usually the result of a process of collective bargaining between an employer and a trade union representing workers.

Suspension – Is defined as the placing of an employee, for disciplinary reasons, in a temporary status without duties and pay.

Workplace Investigation – Is an impartial information gathering process that can be conducted by an external investigator. It is used to establish the facts and circumstances relating to a complaint or grievance. Investigations into misconduct issues can also be conducted.

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RESOURCES REQUIRED

- Proof of Orientation Training
- Posted Company Rules
- Time allotted during the annual health and safety day to cover the rules with all personnel
- Corrective/Disciplinary Action books
- Access to SiteDocs
- HSMS 5-01 Company Rules

PROGRESSIVE DISCIPLINE PROCESS

If an employee of King Paving & Construction Ltd. violates company policy or exhibits problematic behaviour, a system of progressive discipline shall be utilized.

Progressive Discipline can be issued on either: attendance, conduct, health & safety, or performance concerns.


Employees will be given four opportunities to correct unwanted behaviour, unless the behaviour or concern is one of a severe nature, in which case, progressive discipline can be accelerated to match the violation. Typically, progressive discipline will progress through the following steps:

1. Coaching – informal
2. Verbal Warning – formal
3. Written Warning – formal
4. Final Written Warning with Possible Suspension – formal
5. Termination

(It is understood that reference needs to be given to Progressive Discipline guidelines within the most current respective collective agreements. Where the collective agreements dictate specific performance management steps, the company will follow the guidelines. Senior Management must be contacted if there is not a clear understanding of the steps of progressive discipline that are to be followed.)

With each violation or apparent problem, the employee will be provided with a written document to: (1) alert them to the problem, provide a reiteration of the correct company policy regarding the violation, (2) advise them of the consequences associated with further infractions, and (3) provide a suggestion towards a method of improvement.

All formal warnings will be kept on file for a period of 18 months. If no further discipline happens within that time period, the warning will become inactive. If further offences relating to the issue have taken place, the warning will be attached to the next set of progressive disciplinary actions. All copies of progressive discipline letters will remain in the employees' files even though they may become inactive.

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Degrees of discipline shall be used in relation to the problem at hand. As the situation dictates, based on the past performances of the employee, and the seriousness of the violation, King Paving & Construction Ltd. reserves the right to skip the three-step disciplinary process and move straight to termination when necessary.

Progressive Discipline Levels

This policy outlines the Progressive Discipline Levels. The table outlines the progressive discipline steps for common workplace issues. The chart provides clear examples of unacceptable offences and the resulting violation in general terms. The chart does not contain all offences and depending on the nature and severity of the offense, King Paving & Construction Ltd. reserves the right to advance discipline to a higher level.

Chart (Examples of Common Performance Concerns)

Failure to wear safety protection (1 st offense)	Verbal Warning
Failure to wear safety protection (2 nd offense)	Written Warning
Actions causing intentional harm to another employee	Suspension
Insubordination (1 st offense)	Verbal Warning
Failure to follow company policy (3 rd offense)	Final Written Warning


Investigation and Documentation

All violations or alleged violations will be properly investigated and documented by a manager, and/or Senior Management. All formal measures that have been taken within the progressive discipline process will be documented and kept in the employee's personnel file.

Suspension and Review Period

During the final written warning, an employee may be suspended and/or put-on review.

- **Suspension:** Employees put on suspension will be excluded without pay from the workplace for a period of one to three days depending on the violation. Typically, suspension will be for three days unless the employee is required at work to complete projects or perform required duties.
- **Review:** Employees may be put on a review period following the final written warning. The review period will last two months. During the review period the employee will be excluded from wage increases and advancement and is discouraged from taking vacation.
- *The collective agreements must be reviewed if there is a specific guideline for performance management.*

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Termination of Employee

The final stage of progressive discipline is termination of employment. Termination of employment with King Paving & Construction Ltd. may occur following an employee committing multiple violations of company policy, after the logical steps for progressive disciplinary action have been taken or immediately following a severe violation.

Appeals

If an employee feels that they have been wrongfully accused, or disciplined, they may file a written appeal with Senior Management. Written appeals must contain:

- Details of the discipline
- Events surrounding the discipline
- Why the employee feels the discipline is not warranted or appropriate

Senior Management shall review and respond to all written appeals within ten business days.

Suspension with Pay – Pending Investigation

If a King Paving & Construction Ltd. employee is placed on suspension pending the results of an investigation, the employee will be notified of the decision, a stated timeline for the investigation and the actions that predicated the decision.


This form of suspension is not disciplinary but is intended for all King Paving & Construction Ltd. to examine the issues thoroughly and to determine appropriate action. Should the investigation not be completed during the stated timeline, King Paving & Construction Ltd. will reserve the right to extend the suspension, as necessary.

During the investigation, the suspended employee will be provided with the details of the allegations and given an opportunity to respond to them. The suspended employee must ensure that he/she is available for interviews during this period. If the suspended employee fails to make him/herself available, King Paving & Construction Ltd. will proceed with the investigation and make a determination based on the information available.

The suspended employee will have the right to legal representation, union representation, or a King Paving & Construction Ltd. representative present at any such interview and will be given 24 hours' notice prior to any interview taking place.

As the suspended employee will be suspended with full pay, he/she will be required to be available for interviews during this period. Should the suspended employee need to leave town or be unavailable for interviews, he/she must submit a request to be granted approved leave.

Any King Paving & Construction employee who is placed on suspension with pay will be required to temporarily turn over his/her office keys, access passes and King Paving & Construction Ltd. identification and credit cards. All King Paving & Construction Ltd. property, business information, and confidential information are to remain at

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the worksite. If any King Paving & Construction Ltd. employee placed on suspension with pay maintains any files or equipment at his/her residence which are the property of King Paving & Construction Ltd., he/she will be required to turn these items over to a King Paving & Construction Ltd. representative, until such time as the investigation is completed.

King Paving & Construction Ltd. employees placed on suspension with pay should not have contact with anyone from the office other than their designated point of contact.

Program Guidelines


The following progressive discipline actions should be performed given the nature of the offence (serious offences such as physical or sexual assault and/or theft will have zero tolerance).

- **Verbal Warning**

- Employees will be given a verbal warning regarding the undesirable behaviour or action.
- Employees will be given an explanation of when and how the behaviour or action took place. This will include the reason as to why the behaviour or action was unacceptable.
- Employees will be given an opportunity to explain the situation and their actions. This should be his/her opportunity to give their side of the story.
- Employees will be given a description of the desirable and/or acceptable behaviour or actions.
- Employees will be informed that further disciplinary actions, up to and including termination, will follow if unacceptable behaviour continues.
- Employees will be informed that further disciplinary action, up to and including termination, will follow if unacceptable behaviour continues.
- Employees will be informed that the incident will not go into their file, but that it will be taken note of to follow up on possible further disciplinary incidents.
- **NOTE:** Some examples of reasons for verbal warnings are: First late arrival for scheduled shift, first incident of not following proper work procedures, first incident of not wearing proper PPE.

- **Written Warning**


- Employees will be given a written warning regarding his/her undesirable behaviour or action if the behaviour or action had either been discussed in a previous verbal warning or the behaviour or action was considerably severe in nature.
- Employees will be explained when and how the undesirable behaviour or action took place. This will include the reason why the behaviour or action was unacceptable.
- Employees will be given an opportunity to explain the situation and his/her actions. This should be his/her opportunity to give their side of the story.
- Employees will be given a description of the desirable and/or acceptable behaviour or actions.
- Employees will be provided with a copy of the written warning, and another will be placed in the employee's file.
- Employees will sign the document as proof that he/she has received it.
- Employees will be told that future disciplinary problems will be addressed with further progressive disciplinary actions up to and including termination.

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- **NOTE:** Some examples of reasons for written warnings are: Inappropriate or rude interaction with a customer such as a raised voice, sarcastic comments, or impatience, not showing up for a scheduled shift with no reasonable explanation, insubordination such as talking back to management or lack of adherence to service standards.
- **Suspension**
 - Employees will be given written documentation regarding the suspension in relation to the undesirable behaviour or action if the behaviour or action had either been discussed in a previous verbal or written warning or the behaviour or action was considerably severe in nature.
 - The documentation will include information on the offence and the length of the term of suspension and why the employee has been suspended.
 - Employees will be given an explanation of when and how the undesirable behaviour or action took place. This will include the reason why the behaviour or action was unacceptable.
 - Employees will be given a description of the desirable and/or acceptable behaviour or actions.
 - Employees will be provided with a copy of the suspension, and another copy will be placed in the employee's file.
 - Employees will sign the document as proof that he/she has received it.
 - Employees will be told that future disciplinary problems will be addressed with further progressive disciplinary actions up to and including termination.
 - **NOTE:** Some examples of reasons for suspensions are: Repetitive lateness or absences with no reasonable explanation, an incident of verbal abuse to customers, co-workers or management and repetitive lack of adherence to appearance or service standards.
- **Termination**
 - Employees will be given written documentation regarding his/her termination and the undesirable behaviour or action leading to and justifying the termination.
 - Documentation should include information on the offence and previous disciplinary communications with the employee.
 - Employees will be given a description of when and how the unacceptable behaviour or action took place. This will include the reason why the behaviour or action was unacceptable.
 - Employees will be given a description of the desirable and/or acceptable behaviour or actions.
 - Employees will be provided with a copy of the termination notice and another copy will be placed in the employee's file.
 - Employees will be escorted from the location, maintaining the dignity of the terminated employee by not making obvious to other employees that the employee has been terminated and for what reasons.

TRAINING/RECORD KEEPING

Training on the "Progressive Discipline Policy" shall be conducted as part of the worker orientation process, with follow-up refresher training conducted every three years.

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Training records shall be maintained for employees involved in Progressive Discipline Management.

The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

Training records shall be maintained by the Health and Safety Department.

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Toolbox talks
- Company emails
- Annual safety day

ROLES AND RESPONSIBILITIES

Senior Management will:


- Assume ultimate responsibility for the development and implementation of an effective Progressive Discipline Program
- Allocate appropriate resources, training, and employees to implement and maintain the Progressive Discipline Program
- Provide active support for activities associated with the Progressive Discipline Program
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval
- Senior management will review deficiencies and take actions to correct identified deficiencies

Foremen/Supervisors/Managers/Superintendents will:

- Complete appropriate training regarding how to administer the progressive discipline policy
- Use the Progressive Discipline form only and provide the designated copy to the employee
- Consult with their next level of Supervisor if there are any questions as how to complete the form
- Complete training on how to identify unwanted behaviour and manage performance in the workplace
- Consult Senior Management prior to any terminations to verify the correct course of action is taken in relation to the situation

Subcontractors will:

- Ensure that all their employees follow all site guidelines for job performance as well as Health and Safety requirements

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- Provide proof of training for employees assigned to work on the project

Employees will:

- Follow established and communicated work practices, health and safety requirements and corporate policies and procedures
- Participate in training as scheduled
- Cooperate in investigations as required
- Work to promote a safe and healthy work environment

Joint Health & Safety Committee members will:


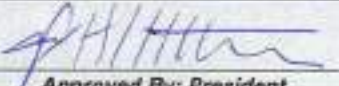
- Work together with employees and Management to identify employees who are not complying with safe work procedures
- Review the policy on an annual basis and make recommendations to improve the Progressive Discipline Program

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the job sites or workplace
- Communicate the requirements of the Program and associated procedures to all relevant parties. Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Safety Day, Toolbox Talks or onsite training
- Promote feedback and recommendations from employees.
- Assist in revisions to the Program, as required
- Keep abreast of the updated legislation with regards to Progressive Discipline Management standards through industry education
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC

Payroll Department will:

- Notify the respective Union Local representative as required of citations as issued
- File and maintain all copies of the progressive discipline and correspondence in the employee files.

Social Media Policy	Issue Date: February 3, 2020	
	Revision Date: January 29, 2025	
Policy Number: HSMS 5-03	Revision Number: 006	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, contractors, and visitors by ensuring everyone, regardless of their position within the company, use social media accounts in safe and effective fashions.

Although social media can benefit the company – especially in terms of relationship building and prospect communication – poorly judged or timed activity can hurt the company's reputation.

SCOPE AND REGULATION

King Paving & Construction Ltd.'s social media policy pertains to all workers as well as subcontractors, who log onto social media platforms during work hours, or to complete work-related activities outside of standard times, or on personal time.


For the purposes of this policy, social media may refer to:

- Popular social networks such as Twitter and Facebook
- Photo-sharing websites such as Pinterest and Instagram
- Professional social networks such as LinkedIn
- Review systems such as Yelp and Google Reviews
- Discussion forums such as the ones found on Reddit
- Question and answer-based networks such as Yahoo Answers

PROCEDURES

The following principles apply to professional use of social media on behalf of King Paving & Construction Ltd. as well as personal use of social media when referencing King Paving & Construction Ltd.

- Workers need to know and adhere to the Company Rules.
- Workers should be aware of the effect their actions may have on their images, as well as King Paving & Construction Ltd.'s image. The information that workers post or publish may be public information for a long time.
- Workers should be aware that King Paving & Construction Ltd. may observe content and information made available by workers through social media. Workers should use their best judgement in posting material that is neither inappropriate nor harmful to King Paving & Construction Ltd., its workers, or customers.
- Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, or that can create a hostile work environment.

<i>Social Media Policy</i>	Issue Date: February 3, 2020	
	Revision Date: January 29, 2025	
Policy Number: HSMS 5-03	Revision Number: 006	
	_____ <i>Approved By: President</i>	

- Workers are not to publish, post or release any information that is considered confidential or not public. If there are questions about what is considered confidential, workers should check with the supervisor or senior management.
- Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Workers should refer these inquiries to senior management.
- If workers encounter a situation while using social media that threatens to become antagonistic, workers should disengage from the dialogue in a polite manner and seek the advice of a supervisor.
- Workers must acquire appropriate permission from King Paving & Construction senior management before posting images of current or former workers, vendors, or suppliers. Additionally, workers should get appropriate permission to use a third party's copyrights, copyrighted material, trademarks, or other intellectual property.
- Subject to applicable law, after-hours online activity that violates the Company Rules or any other company policy may subject an employee to disciplinary action or termination.

Best Advice and General Guidelines for Using Social Media


Adhere to these standards to avoid common social media mistakes:

- **Understand the social network.** Different social media platforms have different purposes. For example, it is common to see more personal status updates on Facebook than LinkedIn. Before posting, become familiar with the network by reading FAQs and quickly researching what is and is not acceptable.
- **Correct your own mistakes.** When you make a factual error in a post, create an update to correct it. Deleting or editing the original post should come at your own discretion, depending on the situation.
- **Beware of potential security threats.** Hackers can use social networks to distribute spam and malware. They can also launch phishing attempts. You should report suspicious activities, including questionable comments and friend requests.
- **Be careful when sharing information about yourself or others.** Hackers can also use personal information to their advantage.
- **Do not escalate issues.** Responding to other social media users, especially concerning a contentious subject, can result in a heated argument. To avoid such arguments, it may be best to avoid commenting if you feel it may spark conflict.
- **Think before posting.** This is the golden social media rule. Not only should you check grammar and spelling, but you should also ensure there won't be any negative effects of posting a status update. These include creating arguments and divulging sensitive information.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Social Media Policy
- Allocate appropriate resources, and employees to implement and maintain the Social Media Policy

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- Review the policy at least annually and approve all revisions. A signature is required on the policy as proof of approval
- Ensure compliance with all those who have a relationship with the organization
- When a complaint has been made, work together with those involved to come to a solution (which may include termination if necessary)

Foremen/Supervisors/Managers/Superintendents will:

- Be knowledgeable in the Social Media Policy
- Enforce the policy and procedures and monitor for compliance
- Work together with the senior management when a complaint has been made
- Communicate the policy to the workers as required

Workers will:

- Understand and comply with the Social Media Policy
- Report all violations of this policy to your supervisor immediately.
- Seek support when confronted with any social media harassment or threats of violence

Subcontractors will:

- Understand and comply with the Social Media Policy
- Report all violations of this policy to your supervisor immediately

Joint Health & Safety Committee members will:

- Work together with Senior Management to review the Social Media Policy annually and make recommendations for continuous improvements
- Re-enforce compliance of the Social Media Policy

TRAINING/RECORD KEEPING

All new hires will complete the training during the new hire orientation process.


The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

Training records shall be maintained by the Health & Safety Department.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings

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- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

CONTINUOUS IMPROVEMENT



The Social Media Policy will be reviewed annually jointly by Senior Management and Joint Health and Safety Committee.

Legislative and industry updates will be reviewed to ensure the Social Media Policy meets the Occupational Health and Safety Act, and any other governing legislation that pertains to this program.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Policy created	New	Feb 3, 2020	000
Update policy, correct errors	Annual Review	Jan 11, 2021	001
Updated Policy Changed wording to read "Workers must acquire appropriate permission from King Paving & Construction senior management before posting images of current or former workers, vendors, or suppliers"	Annual Review	Jan 10, 2022	002
Update policy	Annual Review	Jan 9, 2023	003
Reviewed policy	Annual Review	Jan 9, 2024	004
Replaced eCompliance with SiteDocs	Change in safety platform	Nov 13, 2024	005
Reviewed Policy Minor Grammatical Changes	Annual Review	Jan 29, 2025	006

Cell Phone & Device Policy	Issue Date: January 31, 2016	
	Revision Date: January 29, 2025	
Policy Number: HSMS 5-04	Revision Number: 006	
	 <i>Approved By: President</i>	

POLICY STATEMENT

The purpose of this policy is to protect all King Paving & Construction Ltd. workers from injuries associated with the IMPROPER use of cell phones while driving, operating equipment, or working. These devices cause distraction that prevents you from concentrating on the safe operation of vehicles and equipment and from focusing on the job at hand.

SCOPE AND REGULATIONS

This policy pertains to all workers, visitors, and subcontractors at all work locations where King Paving & Construction Ltd. conducts business.

RULES

SHOULD COMPANY ASSIGNED DEVICES BE REQUIRED FOR USE, THE RULES FOR DRIVERS, EQUIPMENT OPERATORS AND WORKERS ARE:

INCOMING CALLS


- Make sure the device has caller ID and/or voicemail.
- If operating a vehicle or equipment, DO NOT answer unless and until you pull over in a safe location (or let a passenger, co-worker, or voicemail answer the call). If your vehicle is equipped with Bluetooth, you can utilize the hands-free option.
- If not operating a vehicle or equipment, DO NOT answer until you move to a safe location and clear of any moving equipment.
- You may not resume your duties until your conversation has ended.

OUTGOING CALLS

- You may not make outgoing calls while operating a vehicle or equipment or working.
- If operating a vehicle or equipment, and you need to place a call, pull over to a safe location (or let a passenger or co-worker place the call)
- If not operating a vehicle or equipment, and you need to place a call, move to a safe location and clear of any moving equipment.
- You may not resume your duties until your conversation ends.

The use of hands-free devices such as external speakers or ear buds (single ear only) will be permitted for the following operations:

- Operating a truck
- Operating an automobile

Cell Phone & Device Policy	Issue Date: January 31, 2016	
	Revision Date: January 29, 2025	
Policy Number: HSMS 5-04	Revision Number: 006	
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*** The use of a personal cell phone while on an active jobsite must be authorized by the foreman or superintendent. In that situation, ensure that your position is filled while you are on the phone ***

**** VIOLATIONS OF THESE RULES WILL BE CONSIDERED A SERIOUS OFFENCE AND MAY RESULT IN THE IMPOSITION OF DISCIPLINE UP TO AND INCLUDING TERMINATION ****

RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Cell Phone & Device Policy
- Provide active support for activities associated with the Cell Phone & Device Policy
- Review the policy at least annually and approve all alterations. A signature is required on the policy as proof of approval.

Foremen/Supervisors/Managers/Superintendents will:

- Communicate the policy to all workers.
- Ensure that the rules of this policy are followed by all workers.
- Report any violations of this policy to your immediate supervisor.

COMMUNICATION

Foremen/Supervisors/Managers/Superintendents will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Toolbox talks
- Company emails
- Annual safety day

CONTINUOUS IMPROVEMENT

This policy and process for cell phone and device use will be reviewed annually and jointly by Senior Management and the JHSC.

Fit For Duty Policy	Issue Date: August 19, 2021	
	Revision Date: January 29, 2025	
Policy Number: HSMS 5-05	Revision Number: 006	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction, along with our clients and contractors, have an overriding obligation to protect the health and safety of all individuals by ensuring that all workers performing work are Fit for Duty, as defined in this Fit for Duty Policy. Considering this obligation and recognizing the safety-sensitive nature of construction operations, this policy is intended to outline in more detail the standards associated with being Fit for Duty while performing work.

SCOPE AND GUIDELINES

This policy applies to all King Paving & Construction personnel and to all contracted personnel at King Paving & Construction sites and properties.

DEFINITIONS

Worker - (a) Any individual that the Contractor or a Subcontractor employs, contracts with, or assigns to perform work; and/or (b) any Contractor or Subcontractor that is an individual.


Drug - Any substance, including but not limited to alcohol, illicit drugs, medications, or other substances the use of which has the potential to change or adversely affect the way a person thinks, feels, or acts. For purposes of this procedure, drugs of concern are those that inhibit a worker's ability to perform work safely and productively.

- **Alcohol** refers to beer, wine, and distilled spirits, and includes the intoxicating agent found in medicines or other products.
- **Illicit drugs** mean any drug or substance which is not legally obtainable and whose use, sale, possession, purchase, or transfer is restricted or prohibited by law (e.g., street drugs such as marijuana and cocaine).
- **Medication** refers to a drug obtained legally, either over the counter or through a doctor's or nurse practitioner's prescription.

Drug Paraphernalia - Means any personal property associated with the use of any drug, substance, chemical or agent, the possession of which is unlawful in Canada. This would also include any product or device that may be used to attempt to tamper with a testing sample.

Extreme Fatigue - means physical and/or mental exhaustion that reduces a person's alertness such that a safety hazard is created or results in an inability to safely perform work.

Fit for Duty - means, in the context of the policy, that a worker is able, to safely and/or acceptably perform assigned duties without any limitations resulting from but not limited to the use or after-effects of illicit drugs, alcohol, and/or medications; the misuse of and/or failure to take prescribed medications; and/or extreme fatigue.

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On Duty - is the time period commencing from when a worker reports to perform work up until the time, he or she ceases to perform work for the day, and includes lunch, break times and times between the portions of split crews. On duty also includes the time in which an individual is required to be performing work or is on stand-by to perform work.

REQUIRED RESOURCES

- Knowledge or potential mental health issues that may arise in the workplace. Refer to HSMS 15-22 Mental Health Policy.
- Training in workplace violence and harassment policies and procedures (HSMS 13-12 and 13-13)
- Knowledge of HSMS 15-21 Fatigue Management Policy
- Knowledge of HSMS 5-01 Company Rules and HSMS 5-02 Progressive Discipline Policy
- Access to first aid kits
- Cell Phone (Foremen and Superintendents)
- A means to transport a person home if they are unfit for duty.
- If it becomes apparent that opiates are being used, a naloxone kit should be provided on site.
- Access to the Employee Assistance Program

STANDARD/PROCEDURE

Illicit Drugs


The following are prohibited while on duty or otherwise on any King Paving & Construction premises or worksites:

- reporting for duty or remaining on duty under the influence of illicit drugs
- consuming any illicit drugs during meals or other breaks
- the use, possession, distribution, offering or sale of illicit drugs or drug paraphernalia.

Alcohol

The following are prohibited while on duty or otherwise on any King Paving & Construction premises or worksites:

- the use, possession, distribution, offering, or sale of alcohol
- reporting for duty or remaining on duty under the influence of alcohol from any source
- consuming any product containing alcohol

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Medications

Workers are expected to responsibly use all medications. They should investigate (through their doctor or pharmacist) whether a medication can adversely affect performance or the safe operation of any equipment or machinery, including vehicles. They should also take appropriate steps to minimize the associated risk, which would include notifying their King Paving & Construction Supervisor, the King Paving & Construction Contractor or Subcontractor, as applicable, their supervisor or a King Paving & Construction representative of their inability to perform work safely.

The following are prohibited while on duty or otherwise on any King Paving & Construction premises or worksites:

- the possession of prescribed medications without a legally obtained prescription
- the distribution, offering or sale of prescription medications (trafficking)
- the intentional misuse of medications (i.e., using the medication not as prescribed, using someone else's medication, or combining medication and alcohol use against direction)

Extreme Fatigue

Workers are expected to report fit for duty and are responsible for taking appropriate action(s) to avoid extreme fatigue while on duty. When performing work, workers are prohibited from reporting for duty or remaining on duty when suffering from extreme fatigue. All workers are responsible for:

- ensuring sufficient rest periods prior to starting work and utilizing breaks provided within and between shifts to rest and recuperate
- recognizing the symptoms of fatigue and reporting incidents of extreme fatigue to the Contractor or Subcontractor, as applicable, his or her supervisor and/or a King Paving & Construction representative

LEGALIZATION OF CANNABIS


As of October 17th, 2018, Cannabis was legalized in Ontario. This does not mean that smoking or vaping cannabis is legal in the workplace. The following is an excerpt from the Ontario Ministry of Labour document entitled Cannabis Legalization:

"Ontario currently has strict rules in place to make sure workplaces are safe.

Consuming recreational cannabis in the workplace is illegal and will continue to be after legalization on October 17, 2018.

Senior Management/Foremen/Supervisors/Managers/Superintendents:

- Need to know the rules for medical cannabis
- Will be required to address workplace hazards, under the Occupational Health and Safety Act

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Workers:

- Who are unable to work safely could be a hazard to themselves or to others in the workplace
- Have a duty to perform work safely and to report any hazards to their supervisor or employer under the Occupational Health and Safety Act

HOW FAR DOES THE DUTY TO ACCOMMODATE EMPLOYEES USING MEDICAL MARIJUANA EXTEND?

Human rights legislation requires that a disabled employee be accommodated. What, precisely, does this mean in the context of medical marijuana?


- A prescription for medical marijuana does not entitle an employee to be impaired at work
- A prescription for medical marijuana does not entitle an employee to compromise his or her safety, or the safety of others
- A prescription for medical marijuana does not entitle an employee to smoke in the workplace
- A prescription for medical marijuana does not entitle an employee to unexcused absences or late arrivals
- The employer is, however, required to attempt to find suitable workplace accommodation for disabled employees who have a prescription for medical marijuana use, just as would be required for any other disabled employee with a medical drug prescription

INVESTIGATIONS & REPORTING REQUIREMENTS**FIT FOR DUTY****A. King Paving & Construction Personnel:**

King Paving & Construction Personnel are expected to be fit for duty and if not, or has otherwise violated this policy, be required to notify their supervisor immediately and to remove themselves from performing any work.

If any King Paving & Construction staff member has reasonable grounds and believes any worker is not fit for duty, or has otherwise violated this policy, the staff member is to notify their supervisor immediately to remove the worker from performing work. The removed worker will be given the opportunity to speak with their immediate supervisor to explain the situation.

All investigations will be conducted by the immediate supervisor and/or the Health & Safety Department.

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B. Contractors:

If there are reasonable grounds to believe that a worker is not fit for duty, or has otherwise violated this policy, the contractor is required to notify a King Paving & Construction representative immediately, to remove the worker from performing work and to provide the worker with an opportunity to explain the situation.

If a King Paving & Construction Contractor is unavailable or otherwise unable to have the worker removed, King Paving & Construction will remove the worker.

The worker shall not perform any further work, perform additional work, or enter upon any site pending the results of the investigation without the permission of the contractor.

All investigations by the contractor must be carried out to King Paving & Construction's satisfaction. A contractor must prepare a written report directed at the applicable King Paving & Construction representative setting out the nature of its investigation and the results.

C. Investigations by King Paving & Construction Where Conflict of Interests Exists:

In some circumstances, a conflict of interest will exist with regard to having the King Paving & Construction contractor conduct an investigation into whether a worker is fit for duty or has otherwise violated the policy, for e.g. where the worker is a director, owner or officer of the King Paving & Construction contractor, or where the worker is an individual who does not have any employees and is directly engaged by King Paving & Construction. King Paving & Construction in its sole discretion will determine whether a conflict of interest exists preventing the King Paving & Construction contractor from conducting the investigation.


If a conflict of interest exists, the King Paving & Construction contractor shall not investigate whether a worker is fit for duty or has otherwise violated this policy. Instead, a King Paving & Construction representative will conduct the investigation.

If reasonable grounds exist to believe that the worker is not fit for duty or has otherwise violated this policy, he or she will be removed from performing any work and given an opportunity to explain the situation to a King Paving & Construction representative.

If a King Paving & Construction representative still believes that the worker is unfit for duty or has otherwise violated the policy, after the worker is provided with an opportunity to explain the situation, a King Paving & Construction representative will consult with a second King Paving & Construction representative.

The worker shall not perform any further work, perform additional work, or enter upon any site pending the results of the investigation without the permission of King Paving & Construction.

King Paving & Construction will prepare a written report directed to the contractor setting out the nature of its investigation and the results.

<i>Fit For Duty Policy</i>	Issue Date: August 19, 2021	
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IMPAIRED DRIVING SITUATIONS

If required to operate any vehicle, workers must report the loss of a valid driver's license to the Contractor, their supervisor and/or a King Paving & Construction representative immediately. In addition, workers are required to immediately report to the contractor, their supervisor and/or a King Paving & Construction representative the receipt of any impaired driving charges and/or suspensions received while operating a vehicle on duty.

POSSESSION OF ALCOHOL OR DRUGS

King Paving & Construction personnel and King Paving & Construction contractors are required to notify a King Paving & Construction representative if they have reasonable grounds to believe that a worker possesses alcohol and/or illicit drugs while performing work or otherwise on King Paving & Construction premises or worksites while on duty. In cases where the contractor or King Paving & Construction has reasonable grounds to believe this, the police must be contacted. If the police do not investigate, King Paving & Construction in its sole discretion will determine if King Paving & Construction or the contractor will conduct the investigation. A worker may not perform any work or additional work pending the results of an investigation.

If a contractor conducts the investigation, a report must be prepared setting out the nature of its investigation and the results. All investigations conducted by contractors must be carried out to the satisfaction of King Paving & Construction.

WORKER REFUSAL TO PARTICIPATE IN AN INVESTIGATION


Where a worker refuses to participate in an investigation required by this policy, he or she will be directed to cease performing all work and will abide by all decisions and directives made by the company because of their investigation.

VIOLATIONS & CONSEQUENCES

VIOLATIONS

In the case of a confirmed violation of this policy, the contractor and/or worker shall not perform any further or additional work and/or enter upon any King Paving & Construction premises or worksites without the written permission of King Paving & Construction. If requested by King Paving & Construction, the contractor and/or worker must provide a written safety program detailing how the contractor/worker will ensure adherence to this policy when performing further and/or additional work to obtain this written permission.

The decision to permit a contractor and/or worker to perform further and/or additional work and to enter upon King Paving & Construction premises or worksites is at the sole discretion of King Paving & Construction.

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If the contractor and/or worker does receive the written permission of King Paving & Construction to perform further and/or additional work, the contractor and/or worker must adhere to the written safety program, if applicable, and any imposed written conditions that King Paving & Construction in its sole discretion may determine are appropriate to ensure that future violations of this policy do not occur.

CONSEQUENCES

King Paving & Construction staff that are in violation of this Policy will be dealt with as per the disciplinary procedures as set out in the King Paving & Construction Health & Safety Program.

Contractors that are in violation of this policy may be in breach of their contract with King Paving & Construction. This breach of contract may result in the contractor being required to pay liquidated damages pursuant to the terms of the contract to King Paving & Construction, and/or suspension and/or termination of the contract.

At the sole discretion of King Paving & Construction, it may choose to not consider the contractor who has violated this policy, for additional work for a period of one year from the date of the termination letter. In such an instance, during the one-year period, the contractor and/or worker will be removed from the King Paving & Construction bidders list and any bid submissions from the contractor will not be considered. The contractor and/or the worker will also be prohibited from entering any site.


When alcohol or drugs affect a person's work, treatment will be a condition of continued employment. The employee or employer can initiate professional treatment by contacting one of the following groups:

- | | |
|--|---------------------|
| ➤ The Addiction Research Foundation | 800-463-6273 |
| ➤ Centre for Addiction & Mental Health | 416-425-3930 |
| ➤ Alcoholics Anonymous | 416-487-5591 |

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Fit for Duty Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Fit for Duty Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Ensure that all King Paving & Construction personnel and contracted personnel adhere to the Fit for Duty policy.
- Ensure that the requirements of the Fit for Duty policy are being enforced.

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Foremen/Supervisors/Managers/Superintendents will:

- Adhere to the requirements of this Policy and ensure, by enforcing these requirements, that their workers and subcontractors do the same.

Workers:

Workers performing the work are expected to adhere to the requirements of this policy including, but not limited to:


- Report fit for duty and remain fit while on duty or otherwise on site.
- Cooperate with any investigation required by this policy.
- Take appropriate action(s) to minimize any safety risk.
- If unexpected circumstances arise where a worker is requested to perform work while he or she is not fit for duty, it is the responsibility of the worker to inform their King Paving & Construction Supervisor, the King Paving & Construction Contractor or Subcontractor, as applicable, the worker's supervisor and/or a King Paving & Construction representative that he or she cannot perform the work.
- All workers must be physically capable of performing all tasks and duties related to their job.
- If a worker is not able to physically perform their work safely in accordance with the specific policies and procedures associated with the tasks, King Paving & Construction will assist in assigning modified duties of which the worker is capable. This may take the form of modified duties, adjusting work hours, limiting the worker to certain locations and/or duties, assigning a coworker to aid, or assigning duties in accordance with the recommendations of a qualified medical practitioner (following the functional abilities form).
- King Paving & Construction may also assist a worker through the Employee Assistance Program.
- If a worker is deemed unfit for duty, they will be removed from the job site.
- Workers will be monitored for unsafe behaviours or actions to determine if they meet all Fit for Duty requirements.

Subcontractors will:

- Adhere to the requirements of this policy, as applicable, and to ensure, by enforcing these requirements, that their workers and any subcontractors they contract with do the same.
- Subcontractors that are individuals are also expected to adhere to the requirements of the worker's responsibilities, set out above.

TRAINING/RECORD KEEPING

Training shall be arranged and provided by the Health & Safety Department and will take place during King Paving & Construction Orientation.

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COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Toolbox talks
- Company emails
- Annual safety day
- Written correspondence regarding suspected substance abuse
- Incident Reports

Records of communication will be recorded and stored using SiteDocs or other means when required.


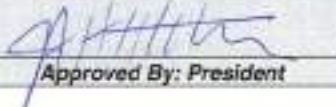
EVALUATION & CONTINUOUS IMPROVEMENT

This policy and process for Hazard Assessment, Analysis and Control Program will be reviewed annually jointly by Senior Management and the JHSC.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy		Aug 19, 2021	New
Added statements regarding workers being physically able to perform duties, Assistance offered by King Paving, modified duties, monitoring workers for unsafe behaviours and removing a worker from a job site when necessary	ISN requirement	Dec 13, 2021	001

Personal Use of Company Vehicles Policy	Issue Date: June 10, 2020	
	Revision Date: January 29, 2025	
Policy Number: HSMS 5-06	Revision Number: 005	
 Approved By: President		

POLICY STATEMENT

This policy covers the personal use of King Paving & Construction Ltd. company vehicles. A 'company vehicle' is any type of vehicle the company assigns to employees to support their transportation needs for their jobs.

POLICY ELEMENTS

Authorized Drivers:

Authorized drivers of a company vehicle for personal use are:

- Employees
- Spouse with employee's permission
- Personnel conducting repairs and service to the vehicle.
- Other supervisory employees authorized by senior management to use a company vehicle for company business and to travel to and from their residence to job sites, customer's facilities, and King Paving & Construction offices.

Company vehicles that are used to travel to work must be parked and secured until required.

****You must ask for approval from senior management if you plan on travelling outside of Canada in your company vehicle****


Accident/Incident/Stolen Vehicle Reporting:

It is King Paving & Construction's policy that **ANY** incident involving injury to persons, a motor vehicle, and/or an incident involving damage to, or theft of property is to be reported immediately to your supervisor and the health & safety department.

A Vehicle Accident & Loss Report form must be completed on scene whenever possible. Please ensure that you take pictures from various vantage points. This form must be submitted to your supervisor the same day or at the very latest, the next day.

NO EMPLOYEE IS TO ACCEPT RESPONSIBILITY, OFFER TO PAY FOR DAMAGES OR ADMIT LIABILITY TO A THIRD PARTY IN ANY WAY, FOR AN ACCIDENT

Failure to report an incident in a timely manner can jeopardize our ability to claim, particularly with respect to our insurance policies. The fact that we carry a deductible does NOT relieve us of the obligation to report potential claims. Our insurance carrier is prepared to investigate incidents on our behalf and provide advice and guidance when necessary. This part of our carrier's service can only be taken advantage of when incidents are reported in a timely manner.

Personal Use of Company Vehicles Policy	Issue Date: June 10, 2020	
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Vehicles in an accident must be repaired promptly; they must not be driven for extended periods of time without having accident damage repaired.

Insurance:

The company carries insurance against Third Party Bodily Injury and Property Damage Liability on all company vehicles. The Liability Certificate must always be carried in the vehicle.

Preventative Maintenance:

The maintenance of light trucks and cars is the responsibility of the operator and the fleet manager. In view of the varying requirements of manufacturers regarding periodic maintenance, routines, and warranty requirements, the operator is expected to follow the manufacturer's recommendations. A maintenance record is maintained for every vehicle.

I _____ acknowledge the receipt of the above policy.

Employee Signature

Date

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy		June 10/20	New
Update Policy	Annual Review	Jan 11, 2021	001
Update Policy Corrected grammatical errors	Annual Review	Jan 10, 2022	002
Update Policy	Annual Review	Jan 9, 2023	003
Reviewed Policy	Annual Review	Jan 10, 2024	004
Reviewed Policy	Annual Review	Jan 29, 2025	005

Personal Protective Equipment	Issue Date: January 16, 2018	
	Revision Date: January 29, 2025	
Policy Number: HSMS 6-01	Revision Number: 010	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to implementing the Personal Protective Equipment (PPE) program and to ensure that all employees are provided with the PPE that is suitable for the task they are performing. The purpose of this policy is to control hazards on the jobsite by using engineering, administrative, or behavioural controls. Despite being the last resort for protection (control at the worker) on construction projects, personal protective equipment (PPE) can be of vital importance.

The company will endeavor to ensure that consideration is given to engineering and administrative controls, as well as the use of proper PPE on each project. To ensure that workers are protected from hazards where possible, it is policy that all personnel on King Paving & Construction Ltd. projects wear the appropriate PPE that is always required by the construction regulations. This regularly includes the following equipment that meets or exceeds current CSA standards: head protection, foot protection, and eye protection, high visibility vest, hearing protection, fall arrest protection and other applicable equipment where appropriate. All required PPE is listed on the individual safe work procedures & is discussed at the daily JHA meeting.

The Occupational Health and Safety Act requires employers to ensure that PPE is available, and employees are trained in the proper care and use of it.

SCOPE AND REGULATION

This policy pertains to all employees, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.

The policy will outline the roles and responsibilities that have been established and will be enforced as part of our due diligence.


- Occupational Health and Safety Act
- Regulations for Construction Projects (O. Reg. 231/91)
- CSA Standard for Protective Clothing
- ANSI American National Standard for Personal Protection

DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the company to whom the subcontractor is providing services for. (e.g., King Paving & Construction Ltd.)

Defective – Means the PPE device does not meet the CSA standards and must be taken out of service. A repair or replacement must be completed in order to meet compliance. The device must be taken out of service and tagged with a "Do Not Use" tag.

Personal Protective Equipment	Issue Date: January 16, 2018	
	Revision Date: January 29, 2025	
Policy Number: HSMS 6-01	Revision Number: 010	
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Personal Protective Equipment – Specialized clothing or equipment worn by employees for protection against health and safety hazards. Personal protective equipment is designed to protect many parts of the body. (i.e., eyes, head, face, hands, feet, and ears).

Pre-Use Inspection – Visual inspection completed by the person going to use the PPE. The inspection should focus on the current condition of the unit. Look for excessive wear or damage that would prevent the PPE from performing its function of protecting the person wearing the device.

Annual Inspection – Pertains to specialized PPE that requires annual inspection by a competent and certified inspector. Inspections are outlined in the manufacturer's manual.

Services – Means a service or work being performed by a subcontractor for the company.


Subcontractor – Means a person or company who performs work or provides a service to the company.

Violation – Means any failure of the Company's or subcontractor's workforce to comply with the Company's rules.

Progressive Discipline – Is a process for dealing with job-related behaviour that does not meet expected and communicated performance standards. The primary purpose of progressive discipline is to assist the employee to understand a performance problem or opportunity for improvement.

REQUIREMENTS

- The roles and responsibilities regarding the selection, use and care of PPE are listed in the responsibilities section of this procedure.
- All activities that require PPE are documented on all safe work practices and procedures and are listed on the daily JHA forms.
- Specific criteria are used to select the appropriate PPE for all activities. These criteria are listed throughout this procedure and listed in the PPE chart (HSMS 6-02). Prior to the selection of PPE, the safety department researches the CSA standards, Occupational Health and Safety Act, Construction regulations, manufacturer's recommendations, Safety Data Sheets, and any other pertinent standards, regulations or guidelines that pertain to the task and equipment used. This information is used to ensure that the correct PPE is purchased and supplied to all appropriate personnel that will be involved in the tasks. When writing, revising, or updating policies, procedures, and practices, the PPE that is required to perform the task(s) safely is clearly noted in the procedure, practice, and policy. Supervisors can access the safe work practice and procedure files on the shared drive and/or SiteDocs or in the foreman's health & safety binder to review the specific PPE requirements for each task and share the information with the workers during the daily JHA meetings. Specific PPE is also listed in the following policies: HSMS 6-03 Fall Protection, HSMS 6-04 Respiratory Protection, HSMS 13-09 Confined Space Policy, HSMS 15-03 Environmental Policy, HSMS 15-04 Lead Policy, HSMS 15-05 Silica Policy, HSMS 15-06 Asbestos Policy, HSMS 15-09 Hazardous Noise Policy, HSMS 1510 Biohazardous Waste Policy, HSMS 15-11 Hazardous Substances and PCB Policy.

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- d) Written rules and/or guidelines for the proper fitting, care, and use of P.P.E are available. All workers are made aware of these rules/guidelines during orientation and during the annual health and safety day. The rules are based on regulations and on the manufacturer's recommendations. Workers are informed by their foreman as to the PPE that is required each day on site during the daily JHA meeting which takes place at the beginning for the day prior to the start of work.
- e) The company will ensure that the appropriate PPE is provided and/or made available to workers for specific activities. Harnesses are available to workers who are working in confined spaces or working at heights, dust masks are given to workers who are cutting concrete, hearing protection is given to workers when they are using tools such as concrete saws which can emit high noise levels. Clear, tinted, and dark safety glasses are given to workers depending on the brightness of the sun. Foremen have an ample supply of all required PPE and will contact the safety department if they are running low so that more PPE can be purchased and delivered to the foremen as soon as possible.
- f) The company requires that all PPE is inspected and maintained as per the manufacturer's recommendations and legislative requirements. All King personnel are informed of the requirements and procedures for inspecting and maintaining PPE during the annual health and safety day, during orientations, and during toolbox talks.
- g) The company requires all personnel including management, supervisors, workers, subcontractors, and suppliers of service to use the appropriate PPE at all King Paving & Construction sites and locations. When a person is observed on site who is not wearing the required PPE, they are notified by the foreman, superintendent, or safety representative to adorn the proper PPE immediately. Spare P.P.E is available on site and is generally kept in the foremen's trucks or site trailer. The company has developed a specific form for inspecting PPE. This form is available on SiteDocs (PPE Inspection Form (HSF 6.1)) and will be completed once per month.
- h) PPE is also inspected during JHA meetings, and the foreman will check the applicable boxes on the SiteDocs Daily JHA meeting form.


PERSONAL PROTECTIVE EQUIPMENT SELECTION PROCESS

The selection of PPE will be based on the requirements as outlined in OSHA (Construction Regulation 213/91), hazard assessments, required by SDS, or other requirements.

The Company has developed a required PPE use chart which outlines the type of PPE to be worn when completing certain tasks. Additional or specialized PPE may be required in a site-specific situation and may be defined by the constructor.

RESOURCES REQUIRED:

- PPE that is required as outlined throughout this policy.
- Safe Work Practices and Procedures for each task (PPE requirements are listed per task).
- Peer PPE Inspection Forms (Filled out monthly at each site and returned to the office)
- Access to SiteDocs (for the Acknowledgement of PPE received form).
- All King personnel are to participate in the King Paving & Construction Safety Orientation.

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- All Subcontractors are to participate in the King Paving & Construction Safety Orientation.
- PPE Training for all King Personnel (Also covered during the orientation).
- Specialized training for working at heights and confined space entry.
- Specialized PPE for working at heights and confined space entry.
- Respirator training and Fit Testing for personnel who use respirators.
- Specialized training and PPE for personnel who work with asbestos.

PERSONAL PROTECTIVE EQUIPMENT

Personal protective equipment (PPE) is the last means of protecting workers from injury.

PPE is employed when administrative and engineering controls are ineffective or insufficient.

Hazards should be minimized by ensuring that all jobs are well planned, workers are properly trained, and safe work practices and safe job procedures are followed.

PPE provides an additional degree of protection from injury.

TYPES OF PERSONAL PROTECTIVE EQUIPMENT (PPE)

PPE generally falls into two categories:

- Basic – The PPE that should always be worn by all personnel in the workplace. This includes hard hats, safety glasses, safety footwear, hi-vis safety vest and appropriate clothing.
- Specialized – Covers PPE which is used only for specific jobs or for the protection from specific hazards. This includes but is not limited to gloves, welder's gloves, respiratory protective equipment, fall arresting equipment and special clothing.


EYE AND FACE PROTECTION

This PPE is designed to protect the workers from hazards such as:

- Flying objects and particles
- Molten metals
- Splashing liquids
- Ultraviolet, infrared, and visible radiation (welding)

There are two types of eye and face protection:

- Basic Eye Protection includes:
 - Eye cup goggles
 - Monoframe goggles and spectacles with side shields
- Face Protection includes:
 - Metal mesh face shields for radiant heat or hot and humid conditions

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- Chemical and impact resistant (plastic) face shields
- Welder's shields or helmets with specified cover
- Filter plates and lenses

Welders should wear eye protection adequate for the job they are doing. Anyone else working in the area should wear eye protection where there is a chance they could be exposed to a flash.

Inspection: All protective eyewear is to be inspected prior to each use. Inspect safety glasses for damage, excessive scratching of the lenses and proper fit. Face shields should be inspected for cracks and excessive scratching of the surface. Defective eyewear must be reported to the supervisor and replaced immediately.

If Protective eyewear is found to be defective, it must be replaced immediately. All foremen are required to have extra eye protection in their trucks.


Fit and Care: Protective eyewear should fit comfortably. Some safety glasses allow slight adjustments to be made to achieve this goal. If your protective eyewear is uncomfortable, report it to your supervisor so that a reasonable alternative can be obtained in a timely manner. Safety glasses should be kept as clean as possible. Cleaning wipes are available in the foremen's trucks. When storing safety glasses, place them with the lenses facing upward and avoid storing protective eyewear where it is exposed to direct sunlight.

FOOT PROTECTION

Safety footwear is designed to protect against foot hazards in the workplace. Safety footwear against compression, puncture injuries and impact.

Safety footwear is divided into three grades, which are indicated by coloured tags and symbols.

- The tag colour tells the amount of resistance the toe will supply to different weights dropped from different heights.
- The symbol indicates the strength of the sole. e.g., a triangle means a puncture resistant sole able to withstand 135 kg (300 lbs.) of pressure without being punctured by a 5 cm (2 inch) nail.
- The Company requires all personnel on jobsites to have a minimum of a 6" CSA work boot with the green triangle grade which will provide ankle support or what is necessary to meet site specific requirements (i.e., Stelco).
- Choose footwear according to the job hazard and approved standards.
- Lace up boot and tie laces securely (boots do not provide protection if they are a tripping hazard or fall off).
- Use a protective boot dressing to help the boot last longer and provide greater water resistance (wet boots conduct current).
- Choose a high cut boot (6 in at least) to provide ankle support (fewer injuries).

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Do Not:

- Wear defective safety footwear (i.e., exposed steel toe caps or excessive wear, where the boot is broken down and socks are exposed).
- Under protect your feet.
- Modify safety footwear.

Inspection: All protective footwear is to be inspected prior to each use. Inspect safety boots for damage, separating soles, broken laces, cuts, and areas where the steel or composite toe has broken through the tip of the boot. Defective footwear must be replaced as soon as possible and reported to the supervisor.

Please note: a supervisor has the duty and the right to prevent a worker from entering a site and performing work if their PPE is defective or substandard.

Fit and Care: When selecting safety boots, comfort plays an integral role. Most safety boots that are available on the market today are form fitting, which means that after wearing them for a while, the boot will form to your feet, thereby adding to the comfort. It is also important to realize that the level of protection that safety footwear is rated for will significantly drop if the boot is not tied up correctly. When possible, clean your boots and replace laces when you notice that the laces are becoming frayed or damaged. Store boots in a dry location and in an area where they will not be exposed to direct sunlight.

HEAD PROTECTION

Safety headwear is designed to protect the head from impact from falling objects, bumps, splashes from chemical or harmful substances, and contact with energized objects and equipment.

In construction, the recommended type of protective headwear is a hard hat which has the required "dielectric strength". There are many designs, but they all must meet CSA requirements for Class E.

Most head protection is made up of two parts:


- The shell: light and rigid to deflect blows.
- The suspension: to absorb and distribute the energy of the blow.

Both parts of the headwear must be compatible and maintained according to the manufacturer's instructions. If attachments are used with headwear, they must be designed specifically for use with the specific headwear used. Bump caps or laceration hats are not considered safety helmets.

Inspection and Maintenance

Proper care is required for the headgear to perform efficiently. Its service life is affected by many factors including temperature, chemicals, sunlight, and ultraviolet radiation. The usual maintenance for headgear is simply washing with a mild detergent and rinsing thoroughly.

Do:

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- Replace headgear that is pitted, holed, cracked or brittle.
- Replace headgear that has been subjected to a blow even though damage cannot be seen.
- Remove from service any headgear if its serviceability is in doubt.
- Consult regulations or your supplier for information on headgear.

Do not:

- Drill, remove peak or alter the shell or suspension in any way.
- Apply unauthorized stickers, write, or paint on your hard hat.
- Put chin straps over the brims.
- Use any liner that contains metal or conductive materials.
- Carry anything in the hard hat while wearing the hard hat.

Fit and Care: Hard hats can be adjusted with ease by turning the adjustment knob at the back. Hard hats should fit snugly so as not to be too loose and fall off, but not tight enough to cause any discomfort. Hard hats should be cleaned, when necessary, with a mild soap and water solution and stored where they will not be exposed to direct sunlight.

Note: Hard hats expire after 5 years and need to be replaced. King Paving & Construction supplies all PPE except for safety footwear.

Refer to:

Occupational Health and Safety Act and Regulations for Construction Projects

CSA Standard CAN/CSA-Z94.1-1977

CAN/CSA-Z89.1-1986 Industrial Headwear


HAND/SKIN PROTECTION

In construction, hands and skin are susceptible to physical, chemical and radiation hazards. Personal hand/skin protection is often the only practical means of preventing injury from:

- Physical hazards (heat, vibration or sharp or jagged edges on materials and tools)
- Corrosive or toxic chemicals
- Ultraviolet radiation

King Paving & Construction provides work gloves as well as gloves that are designed for a specific task. King also provides sunscreen which is to be used in accordance with the directions listed on the container.

Some clients require the use of fire-resistant arm sleeves. These will be provided as required.

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Physical Hazards

Workers who use vibrating tools such as jackhammers, grinders, and compactors daily may develop HAVS (Hand Arm Vibration Syndrome). Preventing this disease requires cooperation from both employees and employers.

The company rents a large portion of tools from third party rental companies. Additional controls include:

- All equipment that is rented should have built-in vibration reducing components.
- Monitor exposure times and allow rest breaks away from vibrating tools.
- Ensure proper tool maintenance (worn grinding wheels or tool bearing can lead to higher vibration levels).
- Train exposed workers in prevention techniques.
- Provide anti-vibration gloves.
-

Workers should:


- Wear appropriate clothing in cooler weather to maintain core body temperature.
- Wear gloves whenever possible.
- Wear anti-vibration gloves when using power tools and equipment.
- Avoid smoking which contributes to circulatory problems.
- Report any poorly functioning tools immediately.
-

Inspection: All protective gloves are to be inspected prior to each use. Inspect gloves for damage, cuts, and proper fit. Defective gloves must be replaced immediately and reported to the supervisor.

Chemical Hazards

For protection against chemical hazards, the (material) safety data sheet for the product being used should identify whether gloves are needed and what they should be made of. A SDS must be available on the jobsite for every controlled product being used.

Glove Selection Chart (Sample)	
Chemical Name	Glove Selection
Acetone	Butyl rubber
Cellosolve	PVA, PCA, Neoprene

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Methyl Alcohol	Neoprene, Rubber, NBR
Mineral Spirits	Neoprene
Naphtha	NBR, PVA
Turpentine	PVA, NBR
PVA – Polyvinyl Alcohol PVC – Polyvinyl Chloride NBR – Nitrite Butyl Rubber Viton – DuPont Tradename Product	

Gloves requirements should be discussed with the Health & Safety Department prior to ordering to ensure the correct glove is selected to provide adequate protection.

Skin Protection

In recent years, there has been growing concern over the health risks of exposure to the sun's ultraviolet radiation (UV). Construction workers are particularly at risk because they often work outdoors.


Long term health risks include skin cancer. There has been an increase in the incidence of skin cancer. Exposure to the sun's UV radiation is widely recognized as a highly preventable cause of skin cancer.

The following trades have a higher risk of exposure:

- Concrete finishing
- Roofers
- Rod workers
- Road workers
- Traffic signalers
- Iron workers

Prevention Techniques:

- Apply a broad screen sunscreen with a sun protection factor (SPF) of 30 or greater to all skin areas that are exposed to the sun. Apply 30 minutes prior to being exposed and reapply every 2 hours.
- Add UV protection to the back of the neck by using a fabric neck protector.
- Wear UV absorbent, CSA approved safety glasses.

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- Wear clothing that covers as much of the skin as possible. Tightly woven material will offer greater protection as a physical block to UV rays.
- Find a shaded area for lunch and breaks.
- Educate workers on the hazards of UV radiation.

REFLECTIVE VESTS AND OTHER CLOTHING

Reflective vests are required to be worn at all King Paving & Construction sites. The company provides vests for all workers, supervisors, and visitors. Subcontractors are responsible for supplying their own vests.

Reflective stripes are also added to all hard hats that are provided by the company.

Other reflective clothing is provided for night work. All reflective clothing meets or exceeds the requirements listed in the Ontario Occupational Health and Safety Act, O. Reg. 213/91, O. Reg 851, Ontario Book 7, and CSA standards for personal protective equipment.

RESPIRATORY PROTECTION

Respirators are designed to protect against respiratory hazards in the workplace. These hazards may include gases, vapours, fumes, mist, dust, or bio aerosols.


The company has designated the N95 and 3M QuickLatch Release as the company provided respiratory protection. They are selected using the CSA Standards Z94.4: Selection, Care and Use of Respirators.

To ensure that the respiratory fits well, a fit test must be carried out prior to use. Each fit tester is required to fill in a medical surveillance form that will be provided to Senior Management for review. Workers may be requested to consult with their family physician based on the questionnaire. Once the worker has been approved, a fit test will be scheduled.

Qualitative Fit Tests

Two methods of qualitative fit tests will be used. Note, confirm that the user can taste or smell the agent used to test.

- Irritant Smoke Test – The wearer will have a cloud of irritant smoke created around them. The respirator is adjusted if there is any leakage or irritation. For the safety of the workers, they should be advised to step out of the smoke as soon as they notice any leakage or irritation.
- Bitter Solution Aerosol Test – The user wears the respirator with any articulate filter. A hood/test enclosure is placed over the user's head, then the bitter solution is sprayed inside the hood/test enclosure. If the user cannot taste the bitter solution, the respirator is the right fit.

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User Seal Checks

Before each use of a tight-fitting respirator, a seal check must be performed using:

- **Negative-Pressure Seal Check** – User puts on and adjusts the respirator until it is comfortable. The air inlets are covered with their hands or a plastic cover. The user then inhales softly and holds for five seconds. If the respirator is a proper fit, it should collapse slightly, and no air will be allowed into the face piece. If a leakage is present, readjust the respirator and repeat the test until a proper fit is determined.
- **Positive-Pressure Seal Check** – User puts on and adjusts the respirator until it is comfortable. The exhaust port is covered and the user exhales. If the respirator is a proper fit, the face piece should move away from the user, but no leakage is present. If a leakage is present, readjust the respirator and repeat the test until a proper fit is determined.

Respirator Maintenance and Inspection

- Filters should be changed according to their specific guidelines.
- Damaged parts should be replaced with original parts only.
- Face pieces should be washed according to guidelines.
- Respirators should be assigned to individual workers (if assigned to multiple workers, it should be disinfected after each use).
- Check all parts of the respirator and maintain them according to the manufacturer's recommendations.
- Storage of the respirators should be away from sun, heat, extreme cold, dust, ozone layer, excessive moisture, vermin, damaging chemicals, oils, and grease.

NOTE: IHSA recommends that only NIOSH approved equipment be used for protection against respiratory hazards.


HEARING PROTECTION

Hearing protection is designed to protect against noise exposure hazards. These hazards may include noise-induced hearing loss (NIHL), tinnitus (ringing in the ears), high blood pressure, and fatigue.

The company has designated earplugs and earmuffs as the company provided hearing protection. They are selected using the CSA Standards Z94.2-14: Hearing Protection Devices – Performance, Selection, Care and Use. Earplugs and earmuffs should conform to the latest issue of CSA Standard Z94.2.

Workers who are required to wear hearing protection devices must be provided adequate training and instruction on the care and proper use of the device. This includes its limitations, proper fitting, inspection, and maintenance and, if applicable, cleaning and disinfection.

Inspection: All hearing protection is to be inspected prior to each use. Inspect plugs or muffs for damage, excessive scratching, cracks in the surface and proper fit. Disposable ear plugs must be kept clean. After the work has been completed, do not just throw the plugs on the ground. Dispose of them properly. Defective hearing protection must be replaced immediately and reported to the supervisor.

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All hearing protection is provided by the company so there is no excuse not to wear ear plugs or earmuffs when they are required.

FALL PROTECTION

Ontario has introduced a Working at Heights (WAH) Training Standard and made changes to legislation to reduce the number of fall-related injuries and fatalities. The minimum requirements for fall protection are described in Section 26 of the Construction Projects regulation (213/91). All workers that are working on the sites will be required to have a Working at Heights card.

Fall protection must be used where a worker may be exposed to any hazards listed in O. Reg. 213/91, s. 26).

A guardrail system must be used as a method for protection when workers are exposed to a fall of 2.4m (8ft) or more and have access to the perimeter or an open side of any of the work surfaces listed in O. Reg. 213/91, s. 26.3(1).

In cases where it is not practical to install guardrails, the worker must be protected by the highest-ranked method of fall protection that is practical (O. Reg. 213/91, s. 26.1(2)). These may include:

- Travel restraint system
- Fall restricting system
- Fall arrest system
- Safety net

Mandatory training is required for any worker who may use one of the four methods of protection.


Inspection: All fall protection is to be inspected prior to each use. Inspect harnesses, lanyards, lifelines, and associated hardware for any signs of damage such as cuts, tears, rust, and burns. Ensure that rope grabs work properly. The harness and lanyard must have the inspection date and the date of manufacture clearly displayed and readable. If the harness or lanyard does not have the tag or if it is unreadable, the harness or lanyard must not be used. Defective fall protection must be replaced immediately and reported to the supervisor. **A fall protection inspection form must be submitted to SiteDocs on any day that the fall protection will be used.**

Refer to the company Fall Protection Program for further details.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Personal Protective Equipment Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Personal Protective Equipment Program.

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- Provide and maintain all PPE required by the worker except for safety boots. All PPE or clothing will be of a safe design and construction for the work performed and will meet Canadian Standards Association (CSA) Standards.
- Allocate resources for annual inspection of equipment such as fall protection where required.
- When required, management will provide hard hats and safety glasses for any visitors on jobsites.
- Provide active support for activities associated with the Personal Protective Equipment Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Complete appropriate training regarding roles and responsibilities for jobsite compliance.
- Complete a pre-job hazard assessment based on the scope of work to be completed.
- Provide PPE guidelines based on project site as determined in the JHA.
- Contact the Health & Safety Department to purchase any required PPE.
- Ensure employees are trained in the care and maintenance of the PPE and storage instructions have been provided.
- Ensure that workers inspect their PPE prior to use.
- Ensure subcontractors follow and have the required PPE for specific tasks.
- Determine the PPE free zone where applicable.
- Arrange training related to any specialized PPE for workers and maintain training records.
- Keep records of PPE issued to workers and have them sign the acknowledgement form on SiteDocs.
- When required, discipline workers found in contravention of this policy using the Progressive Discipline Policy.
- Ensure there is an adequate amount of PPE available on the jobsites.
- Once per month, the PPE Inspection Form (HSF 6.1) on SiteDocs will be completed.
- Ensure that any damaged or missing PPE is either repaired or replaced by the Company.
- Inform new workers using the Site Orientation Process of all PPE requirements for the jobsite.
- Identify any hazards arising from the scope of work and materials and make PPE available to all workers as required.

Workers will:

- Understand, acknowledge, and comply with the Company's PPE requirements, storage, and safe use.
- Maintain records of training for specialized PPE such as Working at Heights and respirators on the jobsite.
- It is the responsibility of the worker to wear foot protection that meets the requirements of the company.
- Workers are responsible to regularly, or as designated by the Occupational Health and Safety Act and applicable regulations and/or the Company, inspect their personal PPE provided by the Company.

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- PPE provided by the worker, if found to be substandard, must be replaced by the worker. If PPE provided by the Company is found to be substandard, it must be tagged and removed from service to be replaced or repaired by the Company.

Subcontractors will:

- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health & Safety Agreement.

Joint Health & Safety Committee members will:

- Work together with employees and Senior Management to review the Personal Protective Equipment Program annually and make recommendations for continued improvements.
- Re-enforce compliance with the Personal Protective Equipment Program in the workplace.
- When completing the monthly inspections, reporting any worker to site management for failing to comply with this policy.
- Ensure that workers are inspecting their PPE
- When requested, assist the Health & Safety Department in the selection of PPE.


Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsite or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Safety Day, Toolbox Talks, or onsite training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to OHSA Standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Provide training to management and workers on the proper use, care and maintenance of PPE and other safety devices.
- Complete required training to maintain program certification required to instruct training courses.
- Inspect the condition of PPE worn by the workers and supervisory staff on site.

TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

Certification training will be provided by competent and qualified third-party providers.

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The Health & Safety Department will request a copy of the trainer's certification for the course being provided.

Training records shall be maintained for employees involved in Personal Protective Equipment Program training. The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

Training records shall be maintained by the Health & Safety Department.

Any training that does have a standard expiration date will be considered valid for three years. Awareness training will be provided on an ongoing basis and considered to be valid for a period of three years. More frequent training may be required if deemed necessary.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

Occupational Health and Safety Act Construction and Industrial Regulations

Company Rules Policy

Personal Protective Equipment Program


Manufacturer's Product Manuals

Company Personal Protective Equipment Chart

HSMS 6-03 Fall Protection

HSMS 6-04 Respiratory Protection

HSF-1 PPE Inspection form on SiteDocs

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HSMS 13-09 Confined Space Policy

HSMS 15-03 Environmental Policy

HSMS 15-04 Lead Policy

HSMS 15-05 Silica Policy

HSMS 15-06 Asbestos Policy

HSMS 15-09 Hazardous Noise Policy

HSMS 1510 Biohazardous Waste Policy,

HSMS 15-11 Hazardous Substances and PCB Policy

All Safe Work Practices and Procedures

CONTINUOUS IMPROVEMENT

This policy and process for the Personal Protective Equipment Program will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the Personal Protective Equipment Program meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

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POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe work environment for their workers, subcontractors, and visitors by preventing injuries due to falls.

Fall protection is an integral part of our commitment to a safe work environment. Any time an individual is exposed to a fall hazard, there will be a procedure and required PPE to reduce and/or eliminate the hazard of working at heights.

SCOPE AND REGULATIONS

This policy pertains to all workers, subcontractors and visitors that enter or work on any of our jobsites or workplace locations that are exposed to a fall hazard or that are required to work at a height of greater than 3 metres.

Occupational Health and Safety Act, R.S.O., and O. Reg. 851. R.R.O. Industrial Establishments, Section 85 and Reg. 213/91 Construction Projects, Section 26, and Section 27. (Reference to the most current editions of the OHSA)


- O. Reg. 297/13 Occupational Health and Safety Awareness Training
- Canadian Standards Association, Z259. 16-04, Design of Active Fall Protection Systems
- Canadian Standards Association, Z1156, Fall Arrest Systems Practical Essentials
- Canadian Standards Association, Z259. 10-06, Full Body Harness
- Canadian Standards Association, Z259. 2.1-98, Fall Arresters, Vertical Lifelines
- Canadian Standards Association, Z259. 11-5, Energy Absorbers and Lanyards
- Canadian Standards Association, Z259. 2.2-98 Self Retracting Devices for Personal Fall Arrest Systems
- Canadian Standards Association, Z259. 1-05, Body Belts and Saddles for Work Positioning and Travel Restraint
- Canadian Standards Association, Z259. 12-01, Connecting Components for Personal Fall Arrest Systems
- Canadian Standards Association, Z259. 17, Guide to Selection of Fall Protection Components
- Canadian Standards Association, Z259. 2.3-99, Descent Control Devices

DEFINITIONS

For this policy, the following definitions will be used:

Anchorage Point – A secure point of attachment for lifelines, lanyards or deceleration devices that is independent of all means of supporting or suspending the worker. The anchor point must be a fixed support able to withstand the maximum arrest forces that could be applied and be free of sharp edges.

Buddy System – A system of organizing individuals into work groups so that everyone within the group is designated to be observed, but at least one other person in the work group.

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Authorized Workers – Individuals who have been trained and certified as being competent to work safely on a specific task involving the use of scaffolds, suspended scaffolds, or powered elevated platforms.

Competent Person (OHSA) – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance.
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge of any potential or actual danger to health and safety in the workplace

Constructor – Means a person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by him or herself or by more than one employer.

Equipment Inspection Tag – Tag identified with a unique number that has been installed by a certified equipment inspector during the inspection process. This tag identifies the piece of fall arrest system as a King Paving & Construction Ltd. asset. The tag is not to be removed by anyone other than the designated equipment inspector.

Employer – A person who employs one or more worker or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with the owner, constructor, contractor, or subcontractor, to perform work or supply services.

Ensure – Take every reasonable precaution to achieve the stated objective.

Fall Arrest System – An assembly of components joined together so that when the assembly is connected to a fixed support, it is capable of arresting if a worker fell; consists of a full body harness with back mounted “D” ring, a shock absorber lanyard, a lifeline, connecting hardware and anchorage point(s).


Fall Protection – Specialized personal protective equipment designed to prevent falls from height or to bring an individual to a safe and controlled stop after falling.

Fall Restricting System – A type of fall arrest system that has been designed to limit a worker’s fall to a specific distance.

Guardrail System – An assembly of components joined together to provide a barrier to prevent a person from falling from the edge of a surface.

Lifeline – Will be a minimum of 16mm (5/8”) diameter polypropylene rope or other durable 16mm material that provides at least equal protection to the wearer. It must be free of knots, splices and imperfections and used so it cannot be cut or chafed.

Pre-Inspection – The fall arrest equipment shall be visually inspected by the user prior to each use and concerns directed to the site Foreman/Superintendent or Manager. Any defective equipment must be taken out of service and tagged “Do Not Use”. Any equipment tagged out of service must be reviewed by an authorized training person that will determine whether the equipment should be repaired if possible or destroyed.

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Safety Net – A safety net that complies with O. Reg. 213/91, section 26.8, and is located and supported in such a way that it arrests the fall of a worker who may fall into it without endangering the worker.

Swing-fall – The hazard of swinging into an obstruction after falling.

Supervisor – Person who has charge of a workplace or authority over another worker.

Travel Restraint System – An assembly of components capable of restricting a person's movement on a work surface and preventing the person from reaching location from which he or she could fall that includes: equipment designed to keep a person away from the location of a fall hazard; a mechanism which restricts that movement of a person on a work surface; consists of a full body harness, a lifeline or retractable lanyard, and an anchorage point also referred to as a fall restraint.

Worker – Means any of the following, but does not include an inmate of a correctional institution or like institution or facility who participated inside the institution or facility in a work project or rehabilitation program:

- A person who performs work or supplies services for monetary compensation.
- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school board.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, or other post-secondary institution.
- A person who receives training from an employer, but who under the "Employment Standard Act, 2000" is not a worker for the purposes for that Act because of the condition set out in subsection 1(2) of that Act have been met.
- Such other person as may be prescribed who perform work or supply services to an employer for no monetary compensation.


Worker Safety Representative – Worker member of the JHSC or a Health and Safety representative as defined in the OHSA.

Acronyms –

- **FAS** – Fall Arrest System
- **JHSC** – Joint Health and Safety Committee
- **MOL** – Ministry of Labour
- **OHSA** – Occupational Health and Safety Act
- **SOP** – Standard Operating Procedure

Resources Required:

- Harnesses and lanyards for personnel who will be working at heights and/or working in confined spaces.
- Tripods and winches for personnel who will be working in confined spaces.

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- Harness and confined space equipment annual inspections to be conducted by a qualified outside source.
- Working at heights training for all site workers and foremen.
- Confined space training for all personnel who will be entering or attending confined spaces.
- Ladders of the correct size and type based on the tasks to be performed.
- Access to SiteDocs by supervisory personnel.
- Safe work procedures for working at heights, confined space entry and P.P.E.
- Hazard assessments for working at heights.

COMMUNICATION/TRAINING/RECORDS

All workers/subcontractors/visitors who are potentially exposed to fall hazards are required to comply with provincial regulations with regards to fall prevention. Workers who may be exposed to fall hazards shall be trained to recognize the hazards and procedures to follow to minimize the hazards.

Working at Heights certification training will be provided by third party providers, approved by the Chief Prevention Officer from the Ministry of Labour only. Only training certificates from the Ministry of Labour approved providers will be accepted.

Training records shall be maintained for all workers. The record will contain the name of the trained worker, date of training and the signature of the person who conducted the training.


The WAH refresher will be conducted every three years or sooner if there are changes to the OHS standard or if the worker demonstrates he/she has not retained the understanding or skills important to fall protection.

The competent training provider shall train in the following areas:

- Fall hazards in the work area
- Required daily inspection of the equipment
- Selection, proper use, care, and maintenance of equipment comprising of the fall protection system used
- Annual inspect requirements
- Donning and doffing of equipment
- Roles of workers in the fall protection and rescue plans
- Overview of the OHS fall protection standards

New hires will be required to provide a copy of the Ministry of Labour approved WAH card as proof of training at the time of hire. A temporary record of training card may be accepted if the worker has just completed the WAH training. Once the MOL approved card has been received, a copy must be provided to the office.

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through the following events:

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- Scheduled meetings
- Safety communication board postings
- Worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Training courses

Equipment Inspection Records

Equipment inspection of the fall arrest and travel restraints systems shall be maintained by the Health & Safety Department and kept for a period of three years after the use of such equipment.

Any equipment that must be removed from service and cannot be repaired is to be destroyed. Any such equipment must be logged, photographed, and destroyed. Defective equipment must not be taken home for personal use.

A designated competent person will complete annual inspections on the harness, lanyard, lifeline, and rope grab to meet inspection standards. This inspection is usually conducted during the first quarter of each year.

All fall rescue equipment including SRL's and tripod will be sent to a third-Party provider to complete the annual inspection.


Fall Hazards

Identification of the fall hazards will be completed throughout the job.

Elimination of the fall hazards is the first line of defense to protect the workers.

Strategies to Eliminate the Risk of Falls include:

- Remove the reason for the work at heights
- Move the task to ground level
- Ensure that the elevated workplace can support at least 4 times the weight of the worker
- Install permanent safe access to the elevated workplace
- Build safe work platforms or use a cage or lift
- Enclose the workplace
- Install permanent rigid covers over openings and/or erect barriers or guardrails
- Select anchorage points carefully for fall restraint and fall arrest systems.

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Rescue Plans

- A written rescue plan for any situation where a worker(s) is working at heights greater than 3 meters, enters a trench, a confined or restricted space or when there is a chance of a fall.
- The rescue plan can be prepared by the onsite Foreman, Supervisor, Superintendent or Manager with the assistance the JHSC members if available.
- All workers need to be aware of the rescue plan and their role such a rescue of a fellow worker be required.
- The plan needs to be reviewed prior to entering the trench, confined or restricted space. This plan may need to be altered depending on site conditions, scope of work changes or for other reasons.

The King Emergency Response Kit must be on site where the work is located for easy access during emergency situations.


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Fall Protection Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Fall Protection Program.
- Provide active support for activities associated with the Fall Protection Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Senior Management will review deficiencies and take actions to correct identified deficiencies.
- Ensures that the Health and Safety Department implements the necessary equipment inspection, purchasing procedures and protocols to support the Program.

Foremen/Supervisors/Managers/Superintendents will:

- Be trained and authorized to recognize and supervise work that involves the use of fall protection equipment.
- Ensure that all fall arrest, travel restraint and rescue equipment components are CSA approved and have a current inspection tag. Inspection of the equipment is to be inspected by a competent person before and after each use and defective components are taken out of service immediately.
- Ensure that all workers assigned to work that requires the use of fall protection equipment are trained and deemed to be competent in the safe use, care, and maintenance of the equipment.
- Provide a written record of such inspection and approval for continued use.
- Implement a buddy system whenever fall arrest, restraint or rescue systems are required.
- Provide a SJP for all work that involves the use of fall protection equipment.

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- Provide a written rescue plan for workers in advance of all work requiring the use of a fall arrest system or safety net.

Subcontractors will:


- Ensure that all related requirements under OHSA and O. Reg. 851 RRO. 1990 and O. Reg. 213/91 Construction Projects and O. Reg. 297/13 Occupational Health and Safety Awareness Training are met by all workers of subcontractors that work on our King Paving & Construction Ltd. jobsites.
- Ensure that regular inspections and safety audits are conducted on all project sites.
- Ensure that only competent workers are assigned to the project.
- Provide proof of training for workers assigned to work on the project.

Workers will:

- Attend the required training to develop an understanding of the requirements and procedures of the Program. Authorized workers are deemed to be competent in the safe use, care, and maintenance of the equipment.
- Ensure work being carried out on the job site be completed as per O. Reg. 297/13 and O. Reg. 213/91.
- Participate in the development of the SOP and rescue plan for the work involving the use of fall arrest equipment or safety nets.
- Wear the appropriate PPE, as required.
- Participates in training, as required.
- Provides the Supervisor with feedback and suggestions for improvements to the Program.
- Follow the safety procedures outlined in the SOP and observe the regulatory requirements.
- Inspect all the components of fall arrest and travel restraint equipment before and after each use and report defective components to their immediate supervisor.
- Report all incidents involving personal injury or property damage to their immediate supervisor.

Joint Health & Safety Committee members will:

- Work together with workers and management to identify fall hazards, exercise appropriate due diligence, and prioritize safety concerns daily.
- Participate in Fall Prevention Program training as assigned.
- Ensure fall hazards are identified, and equipment is properly worn to prevent falls and enable rescues as required in the workplace.
- Correct and non-compliance on jobsites found during the inspection process.
- Review the policy on an annual basis and make recommendations to improve the Fall Protective Program.

Fall Protection Program	Issue Date: August 17, 2017	
	Revision Date: February 3, 2025	
Policy Number: HSMS 6-03	Revision Number: 009	
	<hr/> <i>Approved By: President</i>	

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the job sites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Be responsible for arranging the annual equipment inspections and maintaining inspection records for all components of the fall arrest systems as per manufacturer's requirements and OHSA regulations.
- Complete formal field audits to ensure compliance with OHSA and the Working at Heights requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from workers.
- Review and advise on the audits results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to Fall Protection standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.

REFERENCES

Occupational Health & Safety Awareness & Training:

<http://www.ontario.ca/law/regulation/130297>

Requirements of O. Reg. 851 for Industrial Establishments Section 85:

<https://www.ontario.ca/laws/regulation/900851#BK14>

Requirements of O. Reg. 213/91 for Construction Projects, Section 26, Section 207:

<https://www.ontario.ca/laws/regulation/910213#BK9>


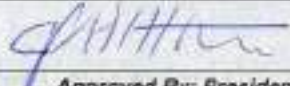
<https://www.ontario.ca/laws/regulation/910213#BK38>

HSMS 6-01 PPE Policy

HSMS 6-02 PPE Chart

EVALUATION AND CONTINUOUS IMPROVEMENT

This policy and process for fall protection will be reviewed annually by Senior Management and the JHSC. Legislation updates will be reviewed to ensure the fall protection policy meets the provincial Occupation Health and Safety Act.

Respiratory Protection Program	Issue Date: January 31, 2014	
	Revision Date: February 3, 2025	
Policy Number: HSMS 6-04	Revision Number: 007	
	 <i>Approved By: President</i>	

POLICY STATEMENT

It is the Company's goal to use engineered or administrative control measures to protect our workers from exposure to any hazardous materials within the workplace. As it may not be practical or feasible in all instances, we have developed a respiratory protection program designed to maintain the health of our workers.

It is our goal to ensure that we meet the Canadian Standard Association's Z94.4-02 "Standard for the Selection, Use and Care of Respirators", Occupational Health and Safety Act (OHSA), R.S.O. and Regulations 1990, Section 25-28, O. Reg 851, R.R.O. 1990, Industrial Establishments, 79, 127, 128 (2)(b), 130, 137, 138, O. Reg 833/90 Control of Exposure to Biological or Chemical Agents, Section 3.7, and Schedule (1) and CSA: Z94.4-2011: Selection, "Use and Care of Respirators".

SCOPE

This program applies to all workers of King Paving & Construction Ltd., as well as all subcontractors and visitors, who are exposed to any hazardous materials while doing work or visiting any of our sites or facilities.

DEFINITIONS

Aerosols – Airborne solid or liquid particles.

Air Line Respirator – Supplies breathing air through a hose to the wearer's face piece.


Air-Purifying Respirator – Removes contaminants from the workplace air passing it through a filter, a cartridge, or a combination of both to provide protection from particulates, vapours, or gases. Types of air-purifying respirators include full face (fits over the mouth, nose, and eyes), and the half mask piece (fits over mouth and nose) that have attachments for filters and/or cartridges. Air-purifying respirators will not provide protection in oxygen deficient atmospheres.

Assigned Protection Factor (APF) – A measure of the minimum anticipated workplace level of respiratory protection that would be provided by a properly functioning respiratory or class of respirators to a percentage of properly fitted and trained users.

Clean Shaven – A worker, visitor, subcontractor, or other person with no facial hair that will interfere with an effective seal between the individual's face and the respirator face piece. The individual must have no more than one day (24 hours) facial hair growth to achieve a good seal.

Chemical Cartridge – Removes specific gases or vapours from the workplace atmosphere. High concentrations of contaminants, high humidity, and high breathing rates will shorten the breakthrough time and usefulness of chemical cartridges.

Dusts – Solid, mechanically produced particles or fibres; airborne solid particles caused by abrasive procedures such as grinding and cutting.

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Engineering Controls – The use of engineered machinery or equipment to eliminate or reduce exposure to a hazard. Examples: fume hoods, biosafety cabinets, mechanical ventilation, adding clean air to oxygen-deficient spaces, enclosure or isolation of the process or work equipment and substitution with less hazardous material.

Fit Testing – Procedure to ensure a good seal between the respirator face piece and the face: may be qualitative (i.e., negative, and positive pressure tests and tests relying on personal sensory response) or quantitative (i.e., utilize a particle generator and particle counter).

Fumes – Occur when metal is heated and suddenly cooled; regarded as airborne condensation of solid particles from hot processes involving metal (i.e., welding, brazing).

Gases – Substances that are in the gaseous state at ambient temperature and pressure.

HEPA Filter – High efficiency particulate air filter (99.7% efficient removal of 0.3 um particles).

Mist – Tiny liquid droplets caused by a spraying or blowing operation.

Particulate Filter – Removes particulates (i.e., dusts, mists, and fumes) from workplace air.

Powered Air-Purifying Respirator – Utilizes a blower which passes air through a filter or cartridge and then supplies air to the face piece; may be suitable for persons with facial hair or respiratory difficulties.

Respirator – Device worn over the mouth and nose to protect the respiratory tract by filtering out hazardous contaminants.

Respiratory Protection – Systems of personal protective equipment designed to protect individual employees from exposure to airborne contaminants.

Smoke – Airborne solid and liquid particulates and gases emitted when a material undergoes combustion.

Supervisor – A person who has charge of a workplace or authority over a worker.

Supplied Air Breathing Apparatus – An airline breathing apparatus that supplies breathing air to the wearer in accordance with CSA Standard Z180.1-00.

Vapours – Substances that evaporate from a liquid or solid at ambient temperature and pressure.

Worker – A person who has entered employment or is employed under a contract of service or apprenticeship, written or oral, expressed, or implied, manual labour or otherwise.

Acronyms:


ACGIH – American Conference of Governmental Industrial Hygienists

APF – Assigned Protection Factor

JHSC – Joint Health & Safety Committee

CSA – Canadian Standards Association

IDLH – Immediately dangers to life or health

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MOL – Ministry of Labour

NIOSH – National Institute for Occupational Health & Safety

QLFT – Qualitative Respirator Fit Testing

QNFT – Quantitative Respirator Fit Testing

SCBA – Self Contained Breathing Apparatus

SOP – Standard Operating Procedures

RESOURCES REQUIRED:

- Respirator masks of various sizes.
- Respirator cleaning wipes.
- Respirator cartridges based on the type of cartridge required for the task.
- Safe Work Procedures for all tasks which involve the use of respirators.
- Hazard Assessments for work that requires the use of respirators.
- Respirator training for appropriate personnel.
- Fit testing for appropriate personnel.


APPLICABLE FORMS

- Medical Surveillance Form
- Fit Testing Form
- Respiratory Hazard Assessment Form
- Standard Operating Procedures
- Employee Fit Test Cards

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Respiratory Protection Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Respiratory Protection Program.
- Provide active support for activities associated with the Program.
- Review the Policy at least annually and approve all revisions. A signature is required on this Policy as proof of approval.

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Program Administrator (which is carried out by the Health & Safety Officer) will:


- Design and implement the Respiratory Protection Program.
- Ensure that the defined roles of the program are filled.
- Ensure that all hazard assessments are completed by qualified people.
- Ensure that a list of accepted respirators is maintained for each hazard.
- Ensure that proper instructions, both written and through training, are provided to workers requiring the use of respirators.
- Ensure ongoing monitoring of the use of respirators.
- Ensure the maintenance and annual review of the Respiratory Protection Program is completed.
- Ensure that all records are kept in a central file or database for a period of no less than ten (10) years.
- Ensure that a health surveillance procedure is in place to determine the medical requirements of respirator use.

Respirator Users will:

- Participate in training and fit testing program.
- Where tight-fitting respirators are used, ensure that they are clean-shaven and that no object or material could interfere with the seal or operation of the respirator.
- Ensure that the respirator assigned is clean and in good working condition prior to each use.
- Follow the manufacturer's specifications with regards to storage, cleaning, and maintenance of the respirator.
- Ensure that the negative and/or positive pressure seal check is done when wearing a tight-fitting respirator prior to entering the hazardous work area.
- Ensure that all defective respirators are reported to the supervisor immediately.
- Advise their supervisor of any change in condition that would affect their ability to safely use a respirator.
- Advise their supervisor if there is a personal weight gain or loss of more than 10lbs that will require a scheduled re-fit.
- Use respirators as per written instructions and training, as applicable. Altering or modifying the respirator is strictly prohibited.
- Follow the program guidelines for changing the masks and cartridges.

Foremen/Supervisors/Managers/Superintendents will:

- Ensure that the appropriate health screening questionnaire, any fit testing, and training on the use of a respirator are completed before assigning a worker to a task requiring the use of the respirator.
- Ensure the proper use, maintenance, storage, cleaning, and inspection of the respirators as noted in the written instructions and the manufacturer's recommendations.
- Ensure that workers requiring tight-fitting respirators remain clean-shaven.

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- Notify the program administrator of any changes in process or materials that would require changes to the respirators and to the program.
- Notify the program administrator of any incidents where the use of a respirator would have prevented or contributed to an injury.
- Ensure that respirators are maintained by qualified persons, and that records are provided for maintenance for the respirators.
- Issue approved respirators to the employee.

Healthcare Professional:

- The worker who will be required to use a respirator must obtain clearance from a qualified medical practitioner. This does not apply to the use of dust masks.

STANDARD/PROCEDURE

Hazard Assessments

Hazard assessments of the work area are to be completed by either the health & safety officer, or a qualified subcontractor. The hazard assessment will be done as part of the Health & Safety Program but will include identification of hazards that require the use of respiratory protection.

The hazard assessment should include:

- the contaminants present
- the physical state of the contaminants
- estimated concentrations of the contaminants
- determination of oxygen levels, to determine the potential for oxygen deficiency
- identification of the occupational exposure limits
- determination of the presence of oil
- determination of immediate danger to life and health (IDLH) conditions
- determination of the existence of adequate warning properties


Selection of Appropriate Respirators

The selection of respirators will be based on the following criteria:

A systematic review of the airborne contaminants' hazards, appropriate standards, regulatory criteria, and manufacturer's information on the types of respirators and their limitations.

Respirator Fit Testing

The fit testing process for the respiratory protection will follow the CSA Standard Z94.4 "Selection, Use and Care of Respirators" and the manufacturer's instructions for the selected respirator.

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Certified Fit Tester

- The Company will acquire the services of a certified fit tester, as required.
- A copy of the fit tester's certification must be provided to the company as proof of competency and provided to the Program Administrator.

Respirator fit testing is to be carried out:

- Prior to the initial use of a tight-fitting respirator
- Every two (2) years, or when a change in respirator has taken place.
- When there are changes to the employee's physical condition that would impact the fit of the respirator
- Using the same make and model as the respirator to be worn.
- All workers being fit-tested must be clean-shaven in the area where the face piece seals to the skin.
- Any additional personal protective equipment that is worn during the use of the respirator should also be worn to ensure the proper fit of the respirator.

TRAINING/RECORD KEEPING

A competent person will provide the training for respiratory protection use, care, and maintenance in accordance with the CSA Standard Z94.4, "Selection, Use and Care of Respirators" and the manufacturer's instructions for the selected respirator, including:


- Policy/Procedure/Responsibilities
- Overview of respirator selection process
- Proper use, care, and maintenance of the selected respirator
- Donning and doffing the respirator
- Negative and positive pressure seal checks

The program trainer must complete and maintain records of attendance for all training sessions. All records of training will be provided to the program administrator for recordkeeping purposes.

All workers will be issued a user card indicating the type of respirator the worker is authorized to use and the expiry date of the cardholder's training.

As it is the responsibility of the Program Administrator to maintain records, the following records are to be kept in a central file or database:

- Hazard assessments
- Records of respirator selection
- Records of respirator fit training
- Records of training
- Records of inspection, maintenance, and storage
- Records of program evaluation

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- References: HSMS 6-01 PPE Policy and HSMS 6-02 PPE Chart


EVALUATION AND CONTINUOUS IMPROVEMENT

To continuously improve the Respiratory Protection Program, the Company will review at least annually jointly by Senior Management and the JHSC and will be based on the evolution of the needs of the Company.

The program review will include:

- Written policy and training program
- Training records
- Exposure assessments
- Safe work procedures
- Health assessment program
- Relevant changes in the practice and/or industrial hygiene which may have been adopted

Policy Maintenance log is on the next page.

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POLICY STATEMENT

King Paving & Construction Ltd. is committed to our preventative maintenance program to ensure all tools, vehicles and equipment are serviced according to the manufacturer's specifications and meeting all legislated requirements. The purpose of this policy is to provide written guidelines for the preventative maintenance of tools, vehicles and equipment that is owned or rented by the company.

The preventative maintenance program will ensure regular maintenance of equipment to improve equipment life, minimize breakdowns and delays on jobsites and prevent injury to workers.

This policy works in conjunction with HSMS 7-02, Preventative Maintenance Statement & Frequency Procedure.

SCOPE AND REGULATION

This policy pertains to all workers, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.

The policy will outline the roles and responsibilities that have been established and will be enforced as part of our due diligence.

- Occupational Health and Safety Act Part III, Section 25 (2)(h)
- Ministry of Transportation (MTO)
- Commercial Vehicles Operator's Registration System
- Manufacturers Maintenance Program

DEFINITIONS


For this policy, the following definitions will be used.

Company – Means the company to whom a subcontractor is providing services for. (e.g., King Paving & Construction Ltd.)

Commercial Vehicle Operator's Registration (CVOR) – An automated monitoring system that tracks the on-road safety performance of Commercial Motor Vehicle (CMV) operators. The goal of the CVOR System is to improve safety for all users of Ontario highways and develop effective compliance strategies with emphasis on safety and protection of the highway infrastructure.

Defective – Means the tool, vehicle or equipment does not meet the operating standards and must be taken out of service. A repair or replacement must be completed to meet compliance. The tool must be taken out of service and tagged with a "Do Not Use" tag.

Pre-Use Inspection – Visual inspection completed by the person/operator going to use the tool/vehicle or equipment. The inspection should focus on the current condition of the unit. Look for excessive wear or damage that would prevent the tool/vehicle or equipment from performing safely.

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Annual Inspection – Pertains to tools, vehicle or equipment that requires annual inspection by a competent and certified inspector. Inspections are outlined in the manufacturer’s manual.

Preventative Maintenance – Is a schedule of planned maintenance actions aimed at the prevention of breakdowns, failures, and potential risk of injury to workers.

CVOR Schedule 1 – Standard list of required vehicle components that must be checked daily as outlined in the MTO schedule 1 chart.

Ministry of Transportation – Is a ministry responsible for transportation within Canada. It usually is administered by the Minister of Transport. The term is also sometimes applied to the departments or other government agencies administering transport within nations that do not employ ministers.


Commercial Motor Vehicle – For the purpose of every provision of the Act and the regulations, “commercial motor vehicle” includes the following, even if it does not have a truck or delivery body attached to it:

- A motor vehicle commonly known as a tow truck.
- A mobile equipment vehicle.
- A vehicle built on a truck chassis O. Reg. 399/16, s.2.

Qualified Person – Is deemed to be qualified due to training and experience with the operations, inspection, and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

PREREQUISITES

- a) King Paving & Construction clearly lists the roles and responsibilities of pertinent parties regarding the Preventative Maintenance Program. These roles and responsibilities are listed in the responsibilities section of this procedure.
- b) An inventory of items is maintained (owned, leased, or rented) and is available and updated as necessary. King Truck & Equipment Repair (3rd Party Service Provider) updates the inventory list on a monthly basis and when new equipment is purchased, or equipment is sold. This list is maintained and stored on the company shared drive. Emails are also sent out to pertinent personnel when new equipment is purchased.
- c) The company requires the use of preventative maintenance schedules for each piece of equipment. These schedules are outlined later in this procedure and are also described in HSMS 7-02 – Preventative Maintenance Statement.
- d) The preventative maintenance schedules are based on the manufacturer’s recommendations and/or legislative requirements. The manufacturer’s recommendations are in the operators’ manuals which are kept with the equipment and stored on the company shared drive. This policy works in conjunction with HSMS 14-04 – Management of Change.
- e) The company requires that all maintenance and repair records are maintained including the corrective actions that were taken. When repairs or maintenance takes place, the repairs or maintenance that was

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performed are listed on the invoice(s). These invoices are saved in pdf format on the company shared drive for future reference as per HSMS 1-03 – Documents and Records.


- f) It is a requirement of King Paving & Construction that all person(s) performing inspections and maintenance are qualified, trained, and competent. Only competent, certified technicians can perform work on vehicles and equipment. Operators of equipment such as loaders, excavators and skid steers will be inspected by the competent operator at the beginning of each day or shift as described in the Pre-Use Inspection section of this procedure.
- g) All overdue and/or defective tools, equipment, facilities, and vehicles are to be removed from service, tagged, or locked out and reported to supervision. Our GeoTab software tracks the hours and mileage for each piece of equipment and notifies King Truck & Equipment Repair (KTR). KTR will notify the supervisor of the job where the vehicle or equipment is as it approaches its maintenance/service date so that the equipment can be brought in for service. For office vehicles or management pickup trucks, KTR will notify the operator. KTR will also notify the person in charge of the vehicle or equipment if it is overdue for service and instruct them to tag it out of service. If a piece of equipment is defective, the foreman will tag the equipment out of service and fill out the defective tool and equipment form on SiteDocs, an action item will be created on the SiteDocs form to ensure that the equipment is either repaired or replaced. Refer to SWP Lock Out and Tagging and SWP Removing Power Tools and Equipment from Service for specific details.
- h) King Paving & Construction utilizes the GeoTab software for scheduling and to track preventative maintenance. In addition, SiteDocs forms are used for people involved in daily inspections.

REQUIRED RESOURCES:

- Cell phone, I-pad, or tablet.
- Access to SiteDocs to use the appropriate pre-use/pre-trip forms and action item requests.
- Internet or data.
- GeoTab for most company owned vehicles and equipment.
- Lockout tags.

GENERAL RULES AND REQUIREMENTS

- Only properly trained workers are to use tools, equipment, and vehicles.
- Inspect all tools, equipment, and vehicles prior to use.
- For vehicles and equipment, daily inspections consist of performing a Pre-Trip Inspection (circle check).
- When applicable, maintenance schedules for all tools, equipment, and vehicles are to be respected.
- Each jobsite Foreman/Superintendent is to ensure weekly inspections of all tools, equipment, and vehicles on the jobsite. Inspections are to be completed using the SiteDocs app.
- The inspection should assess the condition of the tools, equipment and vehicles and take any action required. Action can include such things as putting air in the tires, adding fluids, or removing them from service.

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- If any worker judges that any tool, equipment, or vehicle is unsafe for use, they must properly tag the item (tools must be tagged out of service) and inform the Supervisor immediately.
- Tools, equipment, or vehicles that are tagged unsafe shall be either repaired immediately or removed from service.
- Tools, equipment, or vehicles that are overdue for service or maintenance must not be used. Overdue equipment shall be tagged unsafe and either repaired immediately, removed from service, and arrangements made for the equipment to be taken back to King Truck Repair for service or maintenance.

EQUIPMENT/TOOLS MAINTENANCE LIST

A list of tools, equipment, and vehicles along with written maintenance procedures will be established.

Refer to Safe Work Practices – tool use and maintenance.

The annual list of equipment will be verified at the end of each season by a designated management team.

OPERATOR TRAINING AND QUALIFICATIONS

All individuals who operate mobile equipment, forklifts, vehicles etc. will have the appropriate skills, accreditation and/or certification. This applies to both company workers and contracted equipment services.


Only competent and qualified technicians/inspectors will perform inspections and/or repairs required.

Operators will be trained in the following:

- Their responsibility is to ensure they operate the equipment in a safe manner.
- Familiarity and comprehension of safety requirements for the piece of mobile equipment which they operate.
- Manufacturer's operating and typical maintenance procedures.
- How to communicate with maintenance personnel when there is a problem with a specific piece of equipment.
- Hand signals and/or other requirements set by the manufacturer, the company or dictated by site conditions.

COMMERCIAL MOTOR VEHICLES

- A commercial motor vehicle is a vehicle or combination of vehicle and trailer with a gross weight (GW) or registered weight over 4500kg or (9920 lbs.).
- The GW of a vehicle is located on the manufacturer's plate attached to the driver's door or doorjamb.
- The registered GW of a vehicle is located on the plate portion of the vehicle registration.
- The GW of a trailer is located on the manufacturer's plate attached to the tongue of the left front side of the trailer.

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Vehicle Requirements:

CVOR regulations require the operator to maintain a file of each CMV (Commercial Motor Vehicle). The file will contain a statement of the company maintenance schedule (which must be strictly adhered to), records of all maintenance completed and copies of vehicle inspection reports. The inspection files will be kept on site at the Howard Road location by the trucking foreman.

Driver License Abstract:

A copy of each operator's license shall be obtained quarterly. The company reserves the right to suspend any driver who has points in excess of six indicated on the driver's abstract after meeting with senior management.

Any violations will be reviewed with the driver independently. If necessary, disciplinary action will be taken and all results documented in the driver's personnel file for infractions obtained during working hours.

Documents to be carried in the vehicle:

- A copy of the vehicle registration
- Valid insurance certificate
- A current copy of the CVOR registration
- A current copy of the annual inspection
- A current copy of the trailer registration (Located in the document holder mounted on the trailer)

Roadside Inspections:

CMV's are subject to random roadside inspections. Upon completion of an inspection the driver will be issued a CSVA report. The driver shall notify the trucking foreman by phone immediately. The driver shall give a copy of the CVSA report to management within 24 hours of the inspection.

Equipment Maintenance Schedule Matrix


All mobile equipment is to be inspected and maintained in accordance with the Equipment Maintenance schedule as a minimum.

A matrix will be developed to include:

- A complete list of all equipment requiring regular maintenance.
- A complete list of inspection tasks for each piece of equipment – i.e., oil change, brake inspections.
- The frequency of inspections for each piece of equipment as per the Preventative Maintenance Statement (HSMS 7-02).

The type of maintenance performed:

- Preventative Maintenance i.e., every 6 months/250 hours
- Predictive Maintenance i.e., when a prescribed level of wear/time has been reached
- Corrective Maintenance i.e., due to a breakdown or malfunction

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- Situational Maintenance i.e., as the result of a specific work task

MAINTENANCE CHECKLIST AND REPORTS

Equipment Repair and Maintenance Reporting:


- Each jobsite Foreman/Superintendent is to ensure weekly inspections of all tools, equipment, and vehicles on the jobsite. Inspections are to be completed using the SiteDocs app.
- Our GeoTab software tracks the hours and mileage for each piece of equipment and notifies King Truck & Equipment Repair (KTR). KTR will notify the supervisor of the job where the vehicle or piece of equipment is as it approaches its maintenance/service date so that the equipment can be brought in for service. For office vehicles or management pickup trucks that do not have Geotab, it will be up to the driver of the vehicle to schedule service and maintenance. KTR will also notify the person in charge of the vehicle or equipment if it is overdue for service and instruct them to tag it out of service. If a piece of equipment is defective, the foreman will tag the equipment out of service and fill out the defective tool and equipment form on SiteDocs, an action item will be created on the SiteDocs form to ensure that the equipment is either repaired or replaced. To ensure quick repairs are completed, please notify KTR by phone as well at (905) 639-0400.
- When completing an action item for any deficiencies, you must assign it to scott@kingtruckrepair.com. Remember to always include the unit number and specifically what is wrong.

The maintenance program will contain a recording system. Part of this system is to be made up of inventories and schedules. In addition, the recording system should document what maintenance work was completed, the date and by which technician.

All inspections and reports will be documented and kept on file for not less than five years.

Inspection/Reports will include but are not limited to:

- The date of inspection
- The nature of the inspection
- Inspection results
- The type of maintenance performed
- Maintenance/repair details
- The signature of the qualified person conducting the inspection/repairs

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EQUIPMENT TRACKING AND SERVICE DATES

All mobile equipment owned by King Paving & Construction is tracked by our Geotab software. As a service date approaches, KTR will send out a reminder that the equipment requires service or maintenance. The equipment will then be taken to King Truck Repair. Arrangements for rental equipment will be made to adhere to the appropriate maintenance schedule (i.e., a piece of equipment rented from Cooper will need to be taken to Cooper Rentals).

Equipment that is overdue for service will be removed from service and returned to King Truck Repair for inspection, maintenance, service, or repair as soon as possible.

PRE-USE INSPECTIONS

Pre-use inspections are also referred to as a "walk around" or "circle check". Pre-use inspections on all pieces of mobile equipment are necessary to ensure the unit is safe to operate from the personnel standpoint and for the equipment. The inspection includes all fluid levels to the correct level, general condition of all components, and safety devices etc.


Pre-use inspections must be completed by the first driver/operator of the day. If there are multiple shifts, then an inspection is to be completed at the start of each shift. The report will be valid for 24 hours. If the report is not completed and the vehicle is stopped by the Health & Safety Department or company management to verify compliance of pre-use inspection, the driver/operator will be subject to performance management from the company.

In the case where the driver/operator is stopped at MTO officer and found to be in contravention of the highway traffic act, the driver/operator will be subject to a fine and possible CVOR points for himself/herself and the company.

Prior to the commencement of a pre-inspection, the driver/operator should check the cab area to ensure there are no workers who may be working in or around the unit who may be injured during the inspection process.

Whenever a deviation from standard operating conditions occurs, the driver/operator will report to the Foreman/Superintendent immediately. The deviation will be recorded on the SiteDocs app, and an action item identified as to the appropriate level of action that is required.

All major defects shall be repaired immediately before the vehicle is operated that day or the driver will be subject to disciplinary action. The vehicle will be tagged out of service. Violation of this procedure will result in disciplinary action against the driver/operator.

Preventative Maintenance Policy	Issue Date: January 16, 2018	
	Revision Date: January 21, 2025	
Policy Number: HSMS 7-01	Revision Number: 010	
	<hr/> <i>Approved By: President</i>	


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Preventative Maintenance Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Preventative Maintenance Program.
- Purchase and maintain equipment as required, minimum maintenance will be as per manufacturer's guidelines.
- Ensure that maintenance program is being completed as required and records are available.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.
- Senior Management will review deficiencies and take actions to correct identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Complete appropriate training regarding roles and responsibilities for jobsite compliance of the preventative maintenance program.
- Ensure drivers/operators complete daily pre-use inspection on equipment and vehicles.
- Workers complete a pre-use inspection of tools prior to use.
- Fill out the Defective Tool and Equipment form on SiteDocs and create an action item. For mobile equipment and vehicles, assign the action item to scott@kingtruckrepair.com and follow up with a phone call to 905-639-0400.
- Ensure subcontractors follow the pre-use inspection guidelines on the jobsites.
- Ensure that the manufacturer's manuals are provided with all rental equipment over 10HP, and onsite management is aware of maintenance requirements for the equipment.
- Be aware of any vehicle/equipment deficiencies and ensure it is recorded on the SiteDocs app. Any critical repairs must be communicated directly to King Truck & Equipment Repair and arrange for immediate service.
- Ensure all workers are operating/using the tools, vehicles, and equipment for the correct intended use as per the manufacturer's guidelines.
- Keep abreast of when the equipment on site requires service or maintenance based on the maintenance schedule.
- Ensure any tools that have been tagged "out of service" are repaired or replaced and recorded on SiteDocs.
- Complete the new equipment purchase form on SiteDocs so it can be added to the equipment list upon receipt of the new equipment.
- Complete the annual end of season inventory check list with management.

Preventative Maintenance Policy	Issue Date: January 16, 2018	
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- Ensure that any tools, vehicles, and equipment are operated by competent workers only. Verify that the worker has the required training to operate specific pieces of equipment such as forklift etc. Certification shall be verified before allowing workers to operate specialty equipment.
- Ensure anyone driving a commercial vehicle has a minimum of a class "G" driver's license.
- Ensure that the maintenance program is completed; all units requiring maintenance.
- Provide onsite training for the safe operation, storage and maintenance of any new equipment brought to the jobsite.
- Record any training for new equipment using the SiteDocs app.
- Only allow competent technicians to perform service work on vehicles and equipment.
- Complete a monthly review to ensure adherence to the maintenance equipment matrix.

Workers will:


- Understand, acknowledge, and comply with the company's preventive maintenance program.
- Maintain their individual training records of training for specialized pieces of equipment such as a forklift etc.
- Complete a pre-inspection of tools, vehicles, and equipment prior to use.
- Report any deficiencies immediately to their immediate supervisor and/or their JHSC reps.
- Not operate any tool, vehicle or piece of equipment that is not operating as per manufacturer's guidelines.
- Not remove any type of safety guards or modify the unit without permission.
- Not perform any type of repair without permission to do so.
- Keep all vehicles and equipment free of garbage and debris (e.g., mud) on a shift basis.
- Complete training on how to perform the required pre-use inspections on tools, vehicles, and equipment.

Equipment Rental Companies will:

- Ensure that only certified technicians complete repairs on the vehicles/equipment.
- Ensure that the required maintenance records are completed and kept on file for a minimum of five years.
- Follow up with the Foremen/Superintendents on all maintenance requests when they are completed or when there are delays.
- Ensure the required documentation has been provided in all CVOR vehicles.
- Ensure that the field is notified of the required maintenance to be performed as per the manufacturer's guidelines.
- Ensure all CVOR vehicles and trailers have annual inspections completed as required.
- Advise Superintendents of any type of abuse including poor housekeeping noticed during regular service maintenance.
- Provide reference paperwork in each vehicle on how to complete inspections for CVOR vehicles.

Subcontractors will:

- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health & Safety agreement.

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Joint Health & Safety Committee members will:

- Work together with workers and Management to review the Preventative Maintenance Program annually and make recommendations for continuous improvements.
- Review the policy on an annual basis and make recommendations to improve the Preventative Maintenance Program.
- Re-enforce compliance of the Preventative Maintenance Program in the workplace.
- Complete the monthly inspections and report any worker to site management for failing to comply with this policy.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through any of the following: Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from workers.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to OSHA standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Provide training to management and workers on the proper use, care and maintenance of PPE and other safety devices.
- Complete required training to maintain program certification required to instruct training courses.

TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.


Certification training will be provided by competent and qualified third-party providers.

The Health & Safety Department will request a copy of the trainer's certification for the course being provided.

Training records shall be maintained for workers involved in preventative maintenance program training.

The records will contain the name of the worker trained, date of training and the signature of the person who conducted the training and expiry date.

Training records shall be maintained by the Health & Safety Department and recorded on SiteDocs.

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	Revision Date: January 21, 2025	
Policy Number: HSMS 7-01	Revision Number: 010	
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Any training that does not have a standard expiration date will be considered valid for three years. Awareness training will be provided on an ongoing basis and considered to be valid for a period of three years. More frequent training may be required if deemed necessary.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Geotab reports
- Service reminders
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

Occupational Health and Safety Act Construction and Industrial Regulations

Company Rules Policy

Personal Protective Equipment Program

Owners/Maintenance Manuals

Company Preventative Maintenance Matrix

General Safety Rules and Regulations


Service Ontario Driver's Abstract

Ministry of Transportation of Ontario

Driver's CVOR Logs

SiteDocs Company Vehicle Pre-Trip Inspection form

SiteDocs Operator's Daily Pre-Shift Inspection form

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Schedule 1 Inspection Checklist

HSMS 1-03 Documents and Records

HSMS 7-02 Preventative Maintenance Statement & Frequency Procedure

HSMS 14-04 Management of Change

SWP Lock Out and Tagging

SWP Removing Defective Power Tools or Equipment from Service

CONTINUOUS IMPROVEMENT

This policy and process for the Preventative Maintenance Program will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the preventative maintenance program meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log. (Next Page)

Refer to SiteDocs under Operator's Daily/Pre-Shift Inspection (Required for all operators who operate equipment. Must be completed by the first operator for each shift).

PREVENTATIVE MAINTENANCE STATEMENT & FREQUENCY PROCEDURE	Issue Date: February 13, 2020	
	Revision Date: January 21, 2025	
Policy Number: HSMS 7-02	Revision Number: 005	
 <i>Approved By: President</i>		

PREVENTATIVE MAINTENANCE STATEMENT

The following is applicable to all trucks (including pickups), equipment and trailers owned, leased or operated by King Paving & Construction Ltd. This Preventative Maintenance Statement works in conjunction with HSMS 7-01 Preventative Maintenance Policy,

INSPECTION SCHEDULE

Power Units:

- Every truck and trailer shall receive an "A" inspection every 24,000km +/- 10%.
- Every tractor shall receive a "B" inspection every 3 months or 12,000km +/- 10% .
- Every truck shall receive a "B" inspection every 3 months or 12,000km +/- 10%.
- Every truck and trailer shall receive a "C" inspection every 12 months.

Trailers:

- Every active trailer shall receive an "A" inspection of applicable vehicle components every 90 days +/- 10%
- Every trailer shall receive a type "C" inspection every 12 months.


All Vehicles:

- Every truck, tractor and active trailer shall receive a "D" inspection every month.

INSPECTION TYPES:

"A" Inspection means:

1. Complete chassis lubrication
2. Check transmission and rear axle fluid levels.
3. Visual inspection of all drive line and suspension components
4. Visually inspect and adjust brakes as required.
5. Check and adjust tire pressure.
6. Visual inspection of tires, wheels and fasteners
7. Check lights.
8. Inspect engine fluids and components.

PREVENTATIVE MAINTENANCE STATEMENT & FREQUENCY PROCEDURE	Issue Date: February 13, 2020	
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“B” Inspection means a comprehensive inspection including but not limited to:


1. Oil and filter change
2. Visual inspection of steering components and toe-in
3. Remove dust shields and inspect brake linings.
4. Adjust brakes, if necessary
5. Clean and lubricate 5th wheel and check operation of locking mechanism.
6. Check and clean trailer cords and hoses.
7. Check mounting of bumper, fenders, cab, radiator, and fuel tanks
8. Check and tighten air compressor mounting and head bolts and service breather.

“C” Inspection means an annual inspection in accordance with the requirements as set down in Regulation 611.

“D” Inspection means a chassis lubrication, a visual inspection of all safety components and a brake adjustment as required.

Equipment Repair and Maintenance Reporting:

- Each jobsite Foreman/Superintendent is to ensure weekly inspections of all tools, equipment, and vehicles on the jobsite. Inspections are to be completed using the eCompliance app.
- Our GeoTab software tracks the hours and mileage for each piece of equipment and notifies King Truck & Equipment Repair (KTR). KTR will notify the supervisor of the job where the vehicle or piece of equipment is as it approaches its maintenance/service date so that the equipment can be brought in for service. For office vehicles or management pickup trucks that do not have Geotab, it will be up to the driver of the vehicle to schedule service and maintenance. KTR will also notify the person in charge of the vehicle or equipment if it is overdue for service and instruct them to tag it out of service. If a piece of equipment is defective, the foreman will tag the equipment out of service and fill out the defective tool and equipment form on eCompliance, an action item will be created on the eCompliance form to ensure that the equipment is either repaired or replaced. To ensure quick repairs are completed, please notify KTR by phone as well at (905) 639-0400.
- When completing an action item for any deficiencies, you must assign it to scott@kingtruckrepair.com. Remember to always include the unit number and specifically what is wrong.

PREVENTATIVE MAINTENANCE STATEMENT & FREQUENCY PROCEDURE	Issue Date: February 13, 2020	
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CONTINUOUS IMPROVEMENT

This policy and process for the Preventative Maintenance Program will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the preventative maintenance program meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked on the bottom of the policy and recorded on the document maintenance and tracking log. (Next Page)

Refer to eCompliance under Operator's Daily/Pre-Shift Inspection (Required for all operators who operate equipment. Must be completed by the first operator for each shift).

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy		Feb 13, 2020	New
Updated policy	Annual Review	Jan 18, 2021	001
Updated Policy	Annual Review	Jan 14, 2022	002
Updated Policy	Annual Review	Jan 9, 2023	003
Added Equipment Repair and Maintenance Reporting Section, Continuous Improvement Section, and referenced HSMS 7-01 Preventative Maintenance Policy	Annual Review	Jan 12, 2024	004
Update Policy	Annual Review & changed name	Jan 21, 2025	005

Machine Guarding Policy	Issue Date: January 11, 2022	
	Revision Date: February 3, 2025	
Policy Number: HSMS 7-03	Revision Number: 004	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, subcontractors, and visitors. The purpose of this policy is to protect workers by providing written guidelines to ensure that all equipment and tools meet or exceed the regulatory standards regarding machine guarding.

SCOPE & REGULATION

This policy pertains to all workers, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.


The policy will outline the roles and responsibilities that have been established and will be enforced as part of our due diligence.

- Occupational Health and Safety Act Part III, Section 25 (2)(h)
- Ministry of Transportation (MTO)
- Commercial Vehicles Operator's Registration System
- Manufacturers Maintenance Program
- Occupational Health and Safety Act, Regulation 231, R.R.O, Construction Regulations
- Ontario Fire Code
- National Fire Code
- Ontario Building Code
- CSA Standard CAN C22.2 No. 745-1-95, Safety of Portable Electric Tools Part 1
- CSA Standard CAN C22.2 No. 745-2 Series, Safety of Portable Electric Tools Part2
- CSA Standard CAN C22.2 No. 144-1977, Ground Fault Circuit Interrupters
- ANSI B11.8, Safety Requirements for the Construction, Care, and Use of Drilling, Milling, and Boring Machines
- ANSI B11.9, Safety Requirements for the Construction, Care, and Use of Grinding Machines
- ANSI B11.10, Safety Requirements for the Construction, Care, and Use of Metal Sawing Machines
- ANSI B15.1, Safety Standard for Mechanical Power Transmission Apparatus.

DEFINITIONS

Machine - Includes, but not limited to, fans, compressors, bench grinders, fuel pumps, dumpsters, trash compactors and table saws.

Machine Hazard - occurs at the point of operation and can be created by components which transmit energy (i.e., pulleys, belts, chains, etc.) or other moving parts.

Machine Guarding Policy	Issue Date: January 11, 2022	
	Revision Date: February 3, 2025	
Policy Number: HSMS 7-03	Revision Number: 004	
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Machine Guard - Machine guarding is a safety feature on or around manufacturing or other engineering equipment consisting of a shield or device covering hazardous areas of a machine to prevent contact with body parts or to control hazards like chips or sparks from exiting the machine.

GENERAL RULES & REQUIREMENTS

- Only properly trained workers are to use tools, equipment, and vehicles.
- Inspect all tools, equipment, and vehicles prior to use.
- For vehicles and equipment, daily inspections consist of performing a Pre-Trip Inspection (circle check).
- Ensure all guards are securely in place and in good condition. If a guard is damaged or missing, the equipment or tool must be taken out of service immediately and reported to the supervisor.
- Employees must not wear loose-fitting clothing and/or jewelry if they can meet with moving parts.
- When applicable, maintenance schedules for all tools, equipment, and vehicles are to be respected.
- Each jobsite Foreman/Superintendent is to ensure weekly inspections of all tools, equipment, and vehicles on the jobsite. Inspections are to be completed using the SiteDocs app.
- The inspection should assess the condition of the tools, equipment and vehicles and take any action required. Action can include such things as putting air in the tires, adding fluids, or removing them from service.
- If any worker judges that any tool, equipment, or vehicle is unsafe for use, they must properly tag the item (tools must be tagged out of service) and inform the Supervisor immediately.

REQUIRED RESOURCES:


- Operator's Manuals and/or equipment schematics.
- Lockout tags and locks.
- Lockout/tagout training.
- Current Version of the Ontario Occupational Health and Safety Act and applicable regulations therein.
- Trained operators.
- Adequate tools for the job.

PROCEDURE

All departments shall ensure that the person appointed as supervisor is qualified and competent.

No person shall operate or instruct to operate a machine unless they are qualified and competent and authorized by the Supervisor and the appropriate guards are in place. No person shall modify or disable any protective guards.

Any unguarded machine shall be reported immediately to the supervisor. The worker shall under no circumstances, use an unguarded machine. The Supervisor shall be responsible for organizing or replacing damaged or missing guards. All such machines will be locked out until proper guards are installed.

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Personal protective equipment shall be worn by all workers as prescribed by the Supervisor.

Guidelines:

Each department shall have detailed procedures on site for working with each piece of machinery. Procedures shall include, but not limited to:

1. Procedures for safe work.
2. Personal protection equipment required while working with the machine.
3. Use and meaning of warning devices.
4. Use and meaning of warning signs.
5. Applicable legislation, CSA standards and other relevant guidelines.

Machines that require guarding shall be regularly inspected by the supervisor or competent designate. Record of the inspection and conditions of the machine and guard shall be noted on SiteDocs and available to any personnel utilizing the machinery. Recommended inspection checklist (but not limited to):

1. Is the guard in proper working condition?
2. Is the guard securely installed?
3. Does the guard prevent contact (human, objects) with all moving parts of the machine?
4. Is the guard sufficient to contain the impact of broken pieces of moving machinery?
5. Is the guard free of sharp edges or other hazards?
6. Can the guard be safely handled during maintenance?
7. Is the guard tamper resistant?
8. Can the machinery be inspected/maintained without removing the guard?

Note: If a guard must be removed as part of a repair or servicing, the equipment shall be de-energized and blocked in such a way that the equipment cannot move or fall.


OPERATOR TRAINING & QUALIFICATIONS

All individuals who operate mobile equipment, forklifts, vehicles etc. will have the appropriate skills, accreditation and/or certification. This applies to both company workers and contracted equipment services.

Only competent and qualified technicians/inspectors will perform inspections and/or repairs required.

Operators will be trained in the following:

- Responsibilities to ensure they operate the equipment in a safe manner.

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- Familiarity and comprehension of safety requirements for the piece of mobile equipment which they operate.
- Manufacturer's operating and typical maintenance procedures.
- How to communicate with maintenance personnel when there is a problem with a specific piece of equipment.
- Hand signals and/or other requirements set by the manufacturer, the company or dictated by site conditions.

MAINTENANCE CHECKLIST & REPORTS

The maintenance program will contain a recording system. Part of this system is to be made up of inventories and schedules. In addition, the recording system should document what maintenance work was completed, the date and by which technician.

All inspections and reports will be documented and kept on file for not less than five years.

Inspection/Reports will include but are not limited to:


- The date of inspection
- The nature of the inspection
- Inspection results
- The type of maintenance that was performed
- Maintenance/repair details
- The signature of the qualified person conducting the inspection/repairs

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Machine Guarding Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Machine Guarding Program.
- Purchase and maintain equipment as required, minimum maintenance will be as per manufacturer's guidelines.
- Ensure that maintenance program is being completed as required and records are available.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.
- Senior Management will review deficiencies and take actions to correct identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:


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- Complete appropriate training regarding roles and responsibilities for jobsite compliance of the machine guarding program.
- Ensure proper guards are in place and are in good condition.
- Ensure drivers/operators complete daily pre-use inspection on equipment and vehicles.
- Workers complete a pre-use inspection of tools prior to use.
- Ensure subcontractors follow the pre-use inspection guidelines on the jobsites.
- Ensure that the manufacturer's manuals are provided with all rental equipment over 10 HP and onsite management is aware of maintenance requirements for the equipment.
- Be aware of any vehicle/equipment deficiencies and ensure it is recorded on the SiteDocs app. Any critical repairs must be communicated directly to the trucking & equipment Superintendent who will then decide where the repair should be done (i.e., third-party company) and arrange for immediate service.
- Ensure all workers are operating/using the tools, vehicles, and equipment for the correct intended use as per the manufacturer's guidelines.
- Ensure any tools that have been tagged "out of service" are repaired or replaced and recorded on SiteDocs.
- Complete the new equipment purchase form on SiteDocs so it can be added to the equipment list upon receipt of the new equipment.
- Ensure that any tools, vehicles, and equipment are operated by competent workers only. Verify that the worker has the required training to operate specific pieces of equipment such as forklift etc. Certification shall be verified before allowing workers to operate specialty equipment.
- Provide onsite training for the safe operation, storage and maintenance of any new equipment brought to the jobsite.
- Record any training for new equipment using the SiteDocs app.
- Only allow competent technicians to perform service work on vehicles and equipment.
- Ensure that all guards are in place and in good condition.

Workers will:

- Understand, acknowledge, and comply with the company's machine guarding program.
- Maintain their individual training records of training for specialized pieces of equipment such as a forklift etc.
- Complete a pre-inspection on tools, vehicles, and equipment prior to use. Workers are to pay particular attention to machine or equipment guards.
- Report any deficiencies immediately to their immediate supervisor and/or their JHSC reps.
- Not operate any tool, vehicle or piece of equipment that is not operating as per manufacturer's guidelines.
- Not remove any type of safety guards or modify the unit without permission.
- Not perform any type of repair without permission to do so.
- Keep all vehicles and equipment free of garbage and debris (e.g., mud) on a shift basis.
- Complete training on how to perform the required pre-use inspections on tools, vehicles, and equipment.

Equipment Rental Companies will:

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	Revision Date: February 3, 2025	
Policy Number: HSMS 7-03	Revision Number: 004	
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- Ensure that only certified technicians complete repairs on the vehicles/equipment.
- Ensure that the required maintenance records are completed and kept on file for a minimum of five years.
- Follow up with the Foremen/Superintendents on all maintenance requests when they are completed or when there are delays.
- Ensure the required documentation has been provided in all CVOR vehicles.
- Ensure that the field is notified of the required maintenance to be performed as per the manufacturer's guidelines.
- Ensure all guards are securely in place prior to delivery of the machine or equipment.
- Advise Superintendents of any type of abuse including poor housekeeping noticed during regular service maintenance.

Subcontractors will:


- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health & Safety Agreement.
- Ensure that all equipment is properly guarded.

Joint Health & Safety Committee members will:

- Work together with workers and Management to review the Machine Guarding Program annually and make recommendations for continuous improvements.
- Review the policy on an annual basis and make recommendations to improve the Preventative Maintenance Program.
- Re-enforce compliance of the Machine Guarding Program in the workplace.
- When completing the monthly inspections, report any worker to site management for failing to comply with this policy.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through any of the following: Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from workers.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to OHS standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.

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- Provide training to management and workers on the proper use, care and maintenance of PPE and other safety devices.

TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

Certification training will be provided by competent and qualified third-party providers.

The Health & Safety Department will request a copy of the trainer's certificate for the course being provided.

Training records shall be maintained for workers involved in preventative maintenance program training.

The records will contain the name of the worker trained, date of training and the signature of the person who conducted the training and expiry date.

Training records shall be maintained by the Health & Safety Department and recorded on SiteDocs.

Any training that does not have a standard expiration date will be considered valid for three years. Awareness training will be provided on an ongoing basis and considered to be valid for a period of three years. More frequent training may be required if deemed necessary.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:


- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

Occupational Health and Safety Act Construction and Industrial Regulations

HSMS 5-01 Company Rules Policy

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HSMS 6-01 Personal Protective Equipment Program

Owners/Maintenance Manuals

Company Preventative Maintenance Matrix

General Safety Rules and Regulations

SiteDocs Vehicle Pre-Trip Inspection form (HSF 9.8)

SiteDocs Operator's Daily Pre-Shift Inspection form (HSF 9.3)

Schedule 1 Inspection Checklist

SWP - Lock out and Tagging

SWP - Removing Defective Tools and Equipment from Service

CONTINUOUS IMPROVEMENT

This policy and process for the Preventative Maintenance Program will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the preventative maintenance program meets the Occupational Health and Safety Act, other governing legislation, and updated company policies. The amended policy shall be kept as a record of review and the required changes. The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Vehicle Safety Policy	Issue Date: June 1, 2018	
	Revision Date: February 3, 2025	
Policy Number: HSMS 7-04	Revision Number: 008	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all employees, subcontractors, and visitors.

The purpose of this policy is to provide written guidelines for the operational requirement of Company vehicles and equipment which is a vital aspect of the Health & Safety Program.

This policy has been developed to define standards of conduct and establish mandatory training for workers who operate motor vehicles while conducting business on behalf of King Paving & Construction Ltd.

The primary goal of this policy is to help prevent accidents and minimize the risk of personal injury associated with those incidents.

SCOPE AND REGULATION

This policy applies to individuals who are required to operate a motor vehicle, either company owned or rented, to conduct business on behalf of the Company.

DEFINITIONS


For this policy, the following definitions will be used.

Motor Vehicle Operator – Refers to any worker 18 years of age or older, who operates a motor vehicle while conducting company business.

Suspended License – Administrative License Revocation or ALR is when a driver's license is taken away by law enforcement at the time of the offense or stop by police upon the failure or refusal of a chemical test. Judicial or court ordered license revocation, is done post-conviction by a judge.

Criminal Code Convictions – Your license will be suspended if you are convicted of any of the following Criminal Code offences:

- Driving or having care and control of a vehicle while your ability is impaired by alcohol or drugs.
- Refusing to submit to a breath test for alcohol
- Failing or refusing to provide a breath sample for roadside testing
- Driving or having care and control of a vehicle when your blood-alcohol concentration is more than 90 milligrams per 100 milliliters of blood (.08).
- Driving or having care and control of a boat, motorized or not, when your blood-alcohol concentration is more than 80 milligrams per 100 milliliters of blood (.08).
- Failing to remain at the scene of a collision to escape criminal or civil liability.
- Dangerous driving.
- Causing bodily harm by criminal negligence.
- Causing death by criminal negligence.

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- Failing to stop for police.

Revoked License – A revoked driver's license means your license has been fully canceled and cannot be reinstated.

Vehicle Impound Program – To counter the dangerous behaviours of impaired and suspended driving, Ontario law includes seven-day vehicle impoundments for:

- Drivers operating a vehicle while under a *Highway Traffic Act* license suspension (excluding suspensions for defaulted fines or medical conditions).
- Drivers are required to have a vehicle ignition interlock device and are caught driving without such a device.
- All drivers caught with a blood-alcohol concentration over 0.08 or who fail/refuse to comply with a demand made by a police officer under the Criminal Code of Canada.

If you are caught driving while your license is suspended for a Criminal Code offence, the vehicle you are driving will be impounded for a minimum of 45 days. These vehicle impoundments apply regardless of whether the vehicle is borrowed from a friend or family member, used for business or employment purposes, rented, or leased. The owner of the vehicle must pay the towing and storage costs before the vehicle is released. This program applies to all motor vehicles, including passenger vehicles, motorcycles, trucks and buses.

Qualified Person – Is deemed to be qualified due to training and experience with the inspection and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.


Worker – A person who performs work or supplies services for monetary compensation. Other people who work or provide services to an employer for no money, who may be prescribed by regulation includes an unpaid intern, co-op students, and certain other learners.

ELEGIBILITY TO OPERATE COMPANY VEHICLES

- All drivers must have a valid driver's license in the province of Ontario for the class of vehicle to be operated.
- All workers, both new and returning, must sign an authorization form to authorize a quarterly Driver's Abstract Check to be eligible to operate any Company vehicles.
- All drivers must hold a minimum of a Class G license to operate Company owned or leased vehicles.
- All drivers are required to operate all vehicles in accordance with the Highway Traffic Act.
- Obtaining a driver's license is a personal expense.

DRIVER ABSTRACT REVIEW PROCESS

- The driver's license master database will be submitted on a quarterly basis to the third-party verification provider.

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- The Health & Safety Department will receive and review the results of the injury.
- Based on the status change notification, a full driver's abstract will be requested.
- Senior Management will be notified of any changes to the status of any Company driver.
- Senior Management will schedule a meeting with drivers with a change to their driver's abstract for any of the following reasons:
 - Suspended driver's license
 - Accumulation of 6 points
 - Conviction of an alcohol or drug related offense while driving
 - Being involved in a chargeable accident
 - Reported dangerous driving
- Senior Management will determine if the driver will be placed on a restricted status. If there is a restricted status, the following departments will be notified:
 - Health & Safety Department
 - Operations Management

Drivers with a restricted status are not allowed to operate any Company vehicles or equipment on roadways.

Management is not allowed to assign work involving driving on highways to any worker with a restricted status until the status is changed to active.

ROLES AND RESPONSIBILITIES


Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Vehicle Safety Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Vehicle Safety Program.
- Purchase the required printed materials and program support needed to support the Vehicle Safety Program.
- Review the policy at least annually and approve all alterations. Signatures are required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.

Senior Project Managers will:

- Arrange meetings and interviews with any drivers who are identified as a risk.
- Review the report provided by the Health & Safety Department on a quarterly basis.
- Determine if the driver's privileges are to be placed on restricted status.
- Determine if any disciplinary action may need to be taken.

Foremen/Supervisors/Managers/Superintendents will:

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- Ensure that workers operate only the vehicles that they are licensed to operate.
- Report on any safety concerns regarding drivers to Senior Management.
- Ensure that all company vehicles are in good condition.
- Follow the Preventative Maintenance Policy (HSMS 7-01).
- Ensure that fire extinguishers and first aid kits are inspected monthly for all vehicles.
- Ensure that all company vehicles are kept clean. All trash must be emptied at the end of each use or shift.

Workers will:


- Operate all Company vehicles in accordance with the Highway Traffic Act.
- Follow all posted speed limits.
- Ensure driver and all passengers wear available personal restraints.
- Ensure proper maintenance for the vehicle is kept current as per the manufacturer's requirements.
- Complete daily vehicle inspection and record on SiteDocs.
- Operate the vehicle for Company business only (unless authorized for personal use).
- Not use a cell phone while operating a vehicle.
- Be responsible for parking or moving violations, towing storage or impoundment are the personal responsibility of the assigned driver.
- Report any violations, vandalism or accidents to your Foreman or Superintendent.
- Keep operators compartments clean and free of trash. Trash is to be removed at the end of each use or shift.

Joint Health & Safety Committee members will:

- When consulted, provide input for the development and updating of Vehicle Safety Program.
- Advise Management about any workers who operate vehicles or equipment without a valid driver's license.
- Review and make recommendations on the Vehicle Safety Program within the area of their responsibility.
- Ensure that the confidentiality requirements are maintained throughout the validation process.

Health & Safety Department will:

- Complete the onboarding process with new hires and have the Driver's Abstract Authorization form completed.
- Be responsible for creating, review, and provide the approved Driver Abstract Authorization form for this program.
- Submit the spreadsheet on a quarterly basis to Ontario Motor Coach Association.
- Update the driver status report on SiteDocs.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Review the quarterly report and advise on the audit results and findings.

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- Communicate status changes to the Senior Project Managers.
- Provide guidance to Management regarding any questions or concerns that arise during the review process.
- Assist in revisions to the Program, as required.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.

COMMUNICATION

Communication of this program with regards to the roles and responsibilities will be completed through any of the following forums:

- Scheduled safety meetings
- Safety communication board postings
- Employee orientation
- Toolbox talks
- Specific training courses

Records of communication will be recorded and stored using SiteDocs or other means when required.

TRAINING/RECORD KEEPING

All workers of King Paving & Construction Ltd. who are required to comply with the Vehicle Safety Program. Training records will be maintained by the Health & Safety Department for a period of three years.

Annual training awareness for this program may be completed through any of the different forums:

- New Hire Orientation
- Toolbox Talks
- Management Meetings
- JHSC Meetings

Training records will be maintained by the Health & Safety Department in SiteDocs.


Training awareness updates will be completed every three years.

REFERENCES

New Worker Orientation Form

Site Orientation & Specific Guidelines for Workers Form

Driver Abstract Authorization Form

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Ontario Motor Coach Association
 Ministry of Transportation
 Service Ontario Driver's Abstract
 Commercial Vehicle Operator Registration (CVOR)
 Geo-Tab reports



CONTINUOUS IMPROVEMENT

This standard and process for the Vehicle Safety Program will be reviewed annually jointly by Senior Management and JHSC.

Legislation updates will be reviewed to ensure the Vehicle Safety Program meets the Ministry of Transportation guidelines, Provincial Occupational Health and Safety Act and other governing legislation. If there are legislative or updates in the company policies, the document will be revised and approved.

An evaluation of the Vehicle Safety Program will be conducted annually using surveys, internal audits, or management reviews. A summary review based on the actual results will be prepared for review. The results of the surveys and annual performance results will be reviewed, and recommendations made based on the findings.

The amended policy shall be kept as a record of review and the required changes.


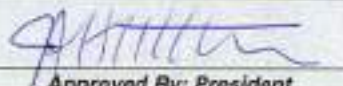
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The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

An action plan is to be created based on the results of the standard evaluation. The action plan will identify the gap, action to be completed, who will be responsible for completing the action and the timeframe for completion.

Record of the action will be identified on the Continuous Improvement Plan and reviewed by Senior Management

Description of Change(s)	Reason for Change (s)	Date	Revision No.
New standard development	New	Jun 1, 2018	000
Update policy	Annual review & company name change	Oct 17, 2019	001
Update policy	Annual review	Feb 13, 2020	002
Update policy	Annual review	Jan 11, 2021	003
Update policy	Annual review	Jan 10, 2022	004
Update policy	Annual review	Jan 9, 2023	005
Update policy Added statements ensuring that fire extinguishers and first aid kits are inspected monthly, and that operator's compartments are to be kept clean and free of trash. Trash is to be removed at the end of each use or shift	Annual review	Jan 12, 2024	006
Replaced eCompliance with SiteDocs	Change in safety platform	Nov 13, 2024	007
Update Policy	Annual Review	Feb 3, 2025	008

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POLICY STATEMENT

King Paving & Construction Ltd. believes that training and education enhance our employees' knowledge. This in turn provides them with the skills required to perform their work in a safe and healthy manner, thus reducing workplace illnesses and injuries.

King Paving & Construction Ltd. will ensure that all employees have acquired the proper training and education upon hiring and before performing any task. The training needs will be assessed according to the company training needs and the legislative requirements and will be provided by competent trainers only.

The purpose of this policy is to provide written guidelines for the education and training requirements for our employees. This policy works in conjunction with HSMS 8-05 - Communication Policy.

SCOPE & REGULATION

This policy pertains to all employees, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.

The policy will outline the roles and responsibilities that have been established and will be enforced as part of our due diligence. The policy will include:


- Roles and Responsibilities for Training
- Training Matrix
- Training Needs Schedule Timetable
- Orientation and Review Checklist (Workers)
- Orientation and Review Checklist (Subcontractors)
- Safety Talk Form
- Training Class Sign in Sheet
- Occupational Health & Safety Act Part III, Section 25(2)(a)
- Occupational Health & Safety Regulation 213/91 Construction Projects

DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the company to whom the subcontractor is providing services for (e.g., King Paving & Construction Ltd.).

Certified Trainer – An individual who has completed required training on subject matter and adult learning. The individual has completed a Train the Trainer course and completed some type of testing to verify competence. The governing body for the subject matter will determine the requirement for recertification. Typically, this will be the Ministry of Labour.

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Safety Training – Safety training is a teaching tool used to help employees become more safety-conscious in all aspects of safety.


Qualified Person – Is deemed to be qualified due to training and experience with the operations, inspection, and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

PREREQUISITES

As per element 8 of the COR audit, King Paving & Construction has a written procedure for training that includes:

Training:

- a) Setting roles and responsibilities for those administering and managing the training procedure. These roles and responsibilities are listed in the responsibilities section of this procedure.
- b) Identifying competencies for each task or role. These competencies are listed under the minimum training requirements and the roles and responsibilities sections of this procedure.
- c) Ensuring in-house trainers are competent. Prior to administering a training course, KPC will determine if the trainer selected is competent to deliver the training course. The determination will be made based on the knowledge, training, and experience that the in-house trainer has regarding the topic being trained. The in-house trainer must have a minimum of 3 years of safety and training experience, a good understanding of the regulations that apply to the work and be able to develop or acquire suitable training materials.
- d) Determining Occupational Health and Safety Training needs by:
 - i. Conducting training needs analysis. The health & safety department will conduct a training needs analysis on a quarterly basis to ensure that all required training is up to date.
 - ii. As part of the training needs analysis, the health & safety department will review all legislated and other training requirements.
 - iii. When analyzing the training requirements, KPC will take into consideration the different levels of responsibilities, abilities, language skills and literacy.
 - iv. Include information on the company's Occupational Health and Safety Management System including purpose, roles, responsibilities and rights, importance of conformity, potential consequences for deviations or non-compliance, and the importance of workers participation within the Occupational Health and Safety Management System. The items listed above are covered during health and safety orientation, and during the annual health and safety day.
- e) King Paving & Construction will provide training prior to the worker performing the relevant task. This may be through a formal training course, on-site training, or through toolbox talks.
- f) King Paving & Construction provides a standardized orientation program that:
 - i. Is completed prior to starting work.
 - ii. Is provided for new and young workers, returning workers or if there is a change in roles.
 - iii. The King Paving & Construction orientation is mandatory for all KPC employees including workers, supervisors, and managers. Subcontractors are also required to take part in the KPC

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safety orientation. The King Paving & Construction Orientation Procedure HSMS 8-02 fully defines the facets of the orientation program.

- g) The health & safety department will administer and manage the training program and will determine the best possible form of training. This may include assigning relevant online training, arranging for in-house training, or utilizing a competent 3rd party source.
- h) After a training course has taken place, the trainee will be asked to fill out an evaluation of training form. This will aid KPC in improving future training courses.
- i) The health & safety department will maintain all training and orientation records. These records are submitted to SiteDocs.


MINIMUM TRAINING REQUIREMENTS

All King Paving & Construction Ltd. employees will receive, but are not limited to, training on the following:

- Legislated Health and Safety responsibilities
- AODA
- Industry Standards
- Ministry of Labour (MOL) Worker Health and Safety Awareness – 4 Step Program (where applicable)
- Ministry of Labour (MOL) Supervisor Health and Safety Awareness – 5 Step Program (where applicable)
- Worker Rights – Right to know, Participate, and to Refuse Unsafe Work
- Company Health & Safety Program and Orientation
- Early and Safe Return to Work obligations
- Safe Material Handling
- WHMIS/SDS
- Working at Heights (where applicable)
- Prescribed Designated Substances (when required)
- The Care and Maintenance of PPE
- Basics of Supervision (where applicable)
- First Aid (where applicable)
- Other required training which is based on the scope of work.
- JHSC Part 1 and/or 2 Certification (where applicable)

RESOURCES REQUIRED:

- Access to SiteDocs.
- Training Records.
- Training Matrix (generated from SiteDocs).
- P.P.E. required for the task. Please note: P.P.E. required during many safety training courses.
- Email access for all supervisory personnel.
- Knowledge of legislative training requirements.
- Weekly Toolbox talks.

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- Time to be made available for personnel who are to attend training courses.
- Access to qualified trainers.
- Training Evaluation Sheets.
- Printed material as required.

COMPETENCIES

The following is a list of competencies that are required by personnel who conduct hazard assessments:

Superintendents, Managers and Foremen: For a superintendent, manager, or foreman to be considered competent to conduct hazard assessments, he/she must have received training in at least one of the following:

- IHSA Basics of Supervision (BOS)
- Supervisor Due Diligence or equivalent
- JHSC Certification Parts I and II
- IHSA Hazard Recognition, Analysis and Control

Health & Safety Personnel: Health & safety personnel include health & safety officers, health & safety coordinators and Joint Health & Safety Committee members. Health & safety personnel must have received training in at least one of the following training courses to be considered competent to conduct hazard and risk assessments:

- JHSC Certification Parts I and II
- IHSA Hazard Recognition, Analysis and Control


WORKER RIGHTS

The Occupational Health and Safety Act recognizes the three rights of the worker: the right to know, the right to participate, and the right to refuse unsafe work.

Management recognizes the knowledge base and experience that our workers bring to the Company. We encourage workers to engage in the development and implementation of the Health & Safety program.

Management believes that through empowerment and working together with the workers and the JHSC, a strong safety culture can be achieved.

The Company will confirm that all workers have completed the online training for worker awareness. In attaining our health and safety goals, the Company will recognize and respect the three rights of the worker: the right to know, the right to participate and the right to refuse unsafe work.

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The Right to Know

Management recognizes the workers' right to know and will endeavor to provide all information required to ensure the worker has adequate knowledge to perform their work in a safe and healthy manner.

Through the process of hazard assessments, workplace inspections and other processes, the Company will identify all existing hazards and potential hazards. Once identified, controls will be implemented to reduce the risk and eliminate injury to the worker. Workers will be educated and when necessary, trained in the controls.

Information will be provided to the workers through, but not limited to, the following methods:

- Training – informal/formal
- Memos
- Posting on the Health & Safety Board
- Safety Talks
- Equipment instructions and manuals

The Right to Participate

Workers have the right to be part of the process of identifying and resolving workplace health and safety hazards and to recommend solutions through the Health & Safety Representatives and JHSC members.


Management will ensure that the selection of the Health & Safety Representatives follows the guidelines listed under the roles and responsibilities policies and procedures. Management recognizes the workers Right to Participate in other ways. We want to always encourage questions and recommendations from our workers and will ensure that no question will be treated as "dumb".

Management will ensure that employees will be treated with respect and consideration.

Management values the wealth of knowledge through our workers.

This knowledge has accumulated over many years of on-the-job work experience. In the attempt to capitalize on this wealth of knowledge, we encourage workers to participate in the improvement of our Health & Safety Program through:

- Safety Talks
- Health & Safety Representatives
- Joint Health & Safety Committee
- Training Evaluations
- One on one meetings with Management
- Support from the Health & Safety Department

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The Right to Refuse Unsafe Work

All workers at King Paving & Construction Ltd. have an obligation to refuse unsafe work when they believe that it could be a potential risk of injury to a worker or equipment damage. If any of the following conditions exist, the worker must refuse to continue the task:

- If any equipment, machine, device, or tool the worker is to use or operate is likely to endanger himself/herself or any other person.
- If the physical condition of the workplace, or the part in which the workers are performing work, is likely to endanger himself/herself or any other person.
- If any equipment, machine, device, or tool used or operated, or the physical condition of the workplace, or part in which they are working, is in contravention of the Occupational Health and Safety Act or applicable regulations and such contravention is likely to endanger themselves or any other person.

Work Refusal Procedures


If a worker invokes their Right to Refuse Unsafe Work, the following steps will be followed:

- The worker must notify their supervisor immediately that they are refusing to perform work. They must offer an explanation as to why they believe the work is unsafe.
- Upon notification of the work refusal, the Supervisor will immediately stop the work.
- If the Supervisor is unable to control the risk to the satisfaction of the worker, then Management will meet with the Health & Safety Department and a certified member of the JHSC. The team may also include another member of Senior Management and the worker who is refusing the work.
- If the worker chooses not to participate in the investigation, then they will remain in a safe place near the workstation or location.
- The team will investigate the circumstances.
- Once corrective measures to resolve the Work Refusal are implemented, and if all parties agree that the situation is considered to now be safe, work can resume.

If Parties Reach an Impasse

If an agreement cannot be reached, the following steps must be followed:

- If the worker still believes that threat remains, the Supervisor must contact the Ministry of Labour.
- The worker is to remain in a safe place near the workstation or location or can be assigned to alternate meaningful work.
- The MOL inspector will present a written report when they have completed their investigation.
- Only when all conditions required by the MOL inspector are implemented should it be considered safe for the worker to return to the prior task that was considered unsafe.

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TRAINING

Training Matrix

A training matrix will be developed to identify and outline the training requirements for all levels of employees within the company.

The matrix will identify the following components:

- Specific training requirements
- Competent trainers and training organizations
- Timeframes
- Method of ensuring transfer of knowledge
- Expiry timeframe
- Verification process

Training Schedule

Each year the Company will identify the minimum training qualifications for the workers. The Company will establish the topics to be covered at the annual Health & Safety Day which is held before the spring start of the season. Training records will be analyzed quarterly to determine additional training that must take place throughout the year.

The Health & Safety Department will work in conjunction with the JHSC members and Supervisors to identify what training would be beneficial for the workers to ensure they can perform their work tasks in a safe and healthy manner.


Training Goals and Objectives will:

- Identify the training – what topics need to be completed.
- Responsibility – who is competent to perform the training.
- Acknowledgement – how to confirm transfer of knowledge.
- Feedback – evaluate and how to improve training courses.

Senior Management will review and approve the training goals and objectives.

Record of Training

- A Record of Training (ROT) provides a systematic approach to ensure that training participants are recognized for attending a particular training session.
- Training records will allow for a quick and general overview of the training status of all workers within the Company. The overview will also allow the Company to ensure they are in compliance with the Occupational Health and Safety Act and any other provincial regulations.

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- The record will include the training topic, date training was delivered, the name of the facilitator, the printed names, and signatures of those attending the training along with their position in the Company.
- The ROT will include a brief description of the course content when training outlines/materials are not provided.
- All training records, including orientation records, will be filed, stored, and maintained on SiteDocs by the Health & Safety Department.
- Training records will be updated after the training has been delivered and/or training records have been received by the third-party provider.

Training Evaluations

- Training evaluation forms have been developed to allow the participant to provide input into the Health & Safety Program.
- Training evaluations will identify the topic of the course, date of course, and the name of the facilitator.
- Training evaluations will provide the opportunity for participants to rank the effectiveness of the course content and location on a scale from poor to excellent.
- They will be able to rank the following components of the course:
 - Quality of training presented.
 - Value of the presentation
 - Relevance of topic to your job
 - Suggestions for improvement
- Training evaluations will allow the participant to provide comments on:
 - Which information was most valuable to them?
 - Which information was least valuable to them?
 - Their suggestions on what they feel would improve the value of the training.

PROCEDURES

- The Company will ensure that the annual training goals and objectives are identified and communicated.
- It will be the Health & Safety Department's responsibility to track the annual goals and objectives to ensure completion.
- During the onboarding process, workers will be required to participate in and, when required, successfully complete all components of the Company Health & Safety Orientation. All returning employees will take part in the orientation during the annual safety day held prior to the start of the construction season.
- Through this process, the Company will ensure that the worker has adequate skills and training for the position for which they have been hired.
- Upon hiring, the Company will verify that any completed legislated training requirements are valid (i.e., WAH, MOL Health & Safety Awareness). If records are found to be non-compliant, the worker will be required to complete the current legislated training necessary.
- If a worker is found to be lacking the required skills, arrangements will be made by the Health & Safety Department to either provide or arrange to have the necessary training provided.

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- The Health & Safety Department will be responsible for ensuring Records of Training (ROT) are recorded and kept on file for a minimum of five years.
- The Company will monitor workplace inspections (refer to the Workplace Inspection Policy) to ensure workers are performing their duties in compliance with training standards.
- Supervisors will reinforce training standards through safety talks or by any other means when and where necessary.
- Refreshers will be delivered to all workers on the annual Health & Safety Day or as necessary.

ENFORCEMENT

Any worker who does not comply with this policy may be subjected to disciplinary actions as per the Company Progressive Discipline Policy.

Supervisors/Foremen may be reassigned if they fail to meet their responsibilities.

The appropriate consequences will depend on the facts of the case, including the nature of the violation, prior violations, and the seriousness of the violation.


ROLES & RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Training Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Training Program.
- Ensure that the Training Program is being completed as required and records are available. Training will be provided by both in-house and third-party certified training professionals.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure that training records are recorded and kept on file for a minimum of five years.
- Develop a written training schedule to identify the minimum standards required for training.
- Ensure workers are trained in the Legislated Health and Safety responsibilities and industry standards.
- Ensure that any worker that has been absent from the Company for more than six months will complete the full Company Orientation Program.
- Conduct and participate in monthly health & safety meetings with Management and continuous improvement will be reviewed on a quarterly basis.
- Participate in the company health and safety orientation annually.

Foremen/Supervisors/Managers/Superintendents will:

- Be knowledgeable about the training expectations and standards of the company.
- Participate in the company health and safety orientation annually.

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- Review training expectations and training records of all company workers on a project to ensure compliance with this policy.
- Communicate minimum training requirements and health and safety expectations on a project through a "Site Specific Worker Orientation" or "Site Specific Subcontractor Orientation".
- Provide training or arrange training when a worker is found to be lacking in any area of their required tasks.
- When a worker is performing work not in compliance with Company or legislated standards, ensure the worker is removed from the work task until they agree and demonstrate that they will work in compliance or, when necessary, training has been delivered.
- In the case of a subcontractor or one of their workers, the Supervisor may require the worker(s) to be removed from the project until proof of adequate training can be provided.
- Keep accurate records of training delivered to workers onsite. Those records must be forwarded to the Health & Safety Department to be uploaded to SiteDocs.
- Complete the Basics of Supervision training. Newly hired or promoted Supervisors must complete the next available course with IHSA to meet the Company requirements for training. Supervisors and foremen are to complete the Ministry of Labour Safety Awareness for Supervisors in 5 Steps online training within 7 days of assuming the role of supervisor.
- When necessary, should a worker refuse to participate in required training activities, the Supervisor should discipline the worker in a manner consistent with the Company "Progressive Discipline Policy".

Workers will:

- Participate in any safety meeting and/or training required by the Company.
- Participate in the company health and safety orientation annually.
- Upon completion, sign all records of training.
- Comply, when required, to successfully complete a quiz or test to prove the transfer of knowledge.
- When required, provide written acknowledgement of receipt of information by signing either a hard copy form or an electronic form on SiteDocs.
- Have access to proof of training while on the construction project sites.
- Work in a manner consistent with the Company and training expectations.
- Report any infractions of the Occupational Health and Safety Act and applicable regulations to your immediate Superintendent/Foreman.

Subcontractors will:

- Ensure their workers are adequately trained as required by the Company.
- Be required to accept full responsibility for ensuring their workers are adequately trained as per the Occupational Health and Safety Act and other regulations as required.
- Provide proof of training for all workers on the job site. If a subcontractor or their worker(s) is/are found to have inadequate skills, Company Management or the Health & Safety Department may require the worker to leave the job site until proof of training can be provided.


Training Policy	Issue Date: January 30, 2025	
	Revision Date:	
Policy Number: HSMS 8-01	Revision Number: New	
	<hr/> <i>Approved By: President</i>	

Joint Health & Safety Committee members will:

- Work together with employees, the Health & Safety Department and Management to review the Training Program annually and make recommendations for continuous improvements.
- Participate in the company health and safety orientation annually.
- Comply with the Company requirement that all Joint Health & Safety Committee members must be certified Level 1 and the committee itself must have a minimum of two certified Level 2 worker members.
- Re-enforce compliance of the Training Program in the workplace.
- When completing the monthly inspections, report any worker(s) to site Management who fail to comply with this policy.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplaces.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the program are embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Safety Day, Toolbox Talks, or onsite training.
- Ensure new workers have adequate training assigned for the tasks they will be expected to perform.
- Ensure that the person conducting the orientation signs the New Worker Orientation form (HSF 8.4).
- Review the training records regularly to ensure that they are adequate, and that the worker training is current.
- Ensure all Health & Safety forms and records are completed and filed on SiteDocs.
- Ensure that additional training is provided for those promoted or for those individuals who assume responsibilities for a new position (e.g., JHSC).
- Ensure that a competent and qualified person (s) delivers all the training. Record of certification is required as proof of competency.
- Deliver or arrange for training when it is deemed a worker has inadequate training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to OHS standards through industry education.
- Be responsible for updating the Policy on an annual basis with Senior Management and the JHSC.
- Complete required training to maintain program certification required to instruct training courses.
- Work with Senior Management to establish the agenda for the annual Health & Safety Day.

Training Policy	Issue Date: January 30, 2025	
	Revision Date:	
Policy Number: HSMS 8-01	Revision Number: New	
	<hr/> <i>Approved By: President</i>	

TRAINING RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department, Management, or qualified third-party providers.

Certification training will be provided by competent and qualified third-party providers.

The Health & Safety Department will request a copy of the trainer's certification for the course being provided.

Training records shall be maintained for employees involved in the Training and Communication Program on SiteDocs for a period of at least five years.

The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training (where applicable) and expiry date.

The Company will ensure that any worker that has been absent from the Company for more than six months, will complete the full Company Orientation Program.

Any training that does not have a standard expiration date will be considered valid for three years. Awareness training will be provided on an ongoing basis and considered to be valid for a period of three years. More frequent training may be required if deemed necessary.

Whenever possible, training will include a theoretical and practical component.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:


- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Toolbox talks
- Company emails
- Annual safety day

REFERENCES

Occupational Health and Safety Act Construction and Industrial Regulations

HSMS 5-01 Company Rules Policy

Training Matrix

Health & Safety Orientation Policy	Issue Date: May 29, 2018	
	Revision Date: February 3, 2025	
Policy Number: HSMS 8-02	Revision Number: 009	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all employees, subcontractors, and visitors.

The purpose of this policy is to provide written guidelines for the orientation of employees, students and subcontractors which is a vital aspect of the Health & Safety Program.

Through orientation, Management can provide new/student, transferred/promoted and/or returning employees as well as subcontractors with information on the specific requirements for health and safety within our organization.

SCOPE AND REGULATION

This policy applies to newly hired employees and to any employees (including acting positions) who are assigned new or unfamiliar work and/or equipment.

Certain provisions of the policy (as indicated) also apply to summer students, supplied labour, and contract employees. For this policy, a new hire would also include anyone returning to the company with a break of service of more than six months.

Health & Safety orientation is conducted for workers as soon as possible after accepting employment with the Company, and before the assignment of work that places their health and safety at risk.

Job-specific health and safety training is provided prior to employees commencing specific jobs they have not previously performed that places their health or safety at risk.


DEFINITIONS

For this policy, the following definitions will be used.

Health & Safety Orientation – Means acquainting workers and others to the KING Health & Safety Program and the hazards to which they may be exposed and familiarizing those individuals with KING's expectations regarding occupational health and safety and the roles and responsibilities of the workplace parties within the Health & Safety program.

Job-Specific Health and Safety Training – Means a formalized training program geared to a specific job/task (e.g., confined space entry) that provides participants with the necessary knowledge and skills to perform the job/task safely.

Qualified Person – Is deemed to be qualified due to training and experience with the inspection and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

Health & Safety Orientation Policy	Issue Date: May 29, 2018	
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Worker – A person who performs work or supplies services for monetary compensation. Other persons who work or provide services to an employer for no money, who may be prescribed by regulation includes an unpaid intern, co-op student, and certain other learners.

Short Service Employee – A person who is hired for a period of 4 months or less to conduct work for the company. This also includes all summer students even if their work term is greater than 4 months. Note: All contracted personnel are considered Short Service Employees and must adhere to the minimum requirements listed in this policy, HSMS 8-01 Training and Communication Policy and HSMS 2-02 Subcontractor Rules and Regulations Policy

New Employee – A person who has been offered a position with the company and who has completed the company health and safety orientation and all other training that has been assigned to them. All new employees must meet the minimum requirements as listed in this policy and listed in HSMS 8-01 Training and Communication Policy. All new employees and workers under 25 must wear a green hard hat.

Additional – All Short Service and New Employees will be monitored for compliance with King Paving & Construction Health Safety and Environmental Policies and Procedures and will be mentored by a qualified, experienced, and knowledgeable employee. Contractors wear hard hats with their company identification.


REQUIRED RESOURCES:

- A customized health and safety orientation program.
- Access to the company shared drive.
- Access to SiteDocs (Orientation form).
- Access to the internet
- Cell phones/tablets for supervisory personnel.
- Printed hand-outs when requested.
- Proof of training.
- P.P.E. based on company minimum requirements.
- Proof of valid driver's license where required.
- Driver's abstracts for all personnel who drive company owned vehicles.
- Venue, courses and presenters for the annual health and safety day.

TRAINING AND ORIENTATION PROGRAM

Health & Safety Orientation Training shall include:


- Health & Safety Policy
- Drug & Alcohol Policy
- Progressive Discipline Policy
- Workplace Violence & Harassment Policy

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- Company Safety Standards
- Employee Roles & Responsibilities
- Traffic Control (Ontario Book 7) where required
- Standards and Procedures for:
 - Reporting injury/illness
 - Hazard Awareness and reporting hazards
 - Emergency response & procedures
 - Early and Safe Return to Work
 - JHSC/Worker Health and Safety Representative activities
 - Refusal to Work
 - PPE Care & Maintenance
 - Completing assigned specific training courses online and externally as required

Site Specific Orientation Training shall include:

- **Workplace/Jobsite Tour including:**
 - Introduction to JHSC/Worker Health & Safety Representative for the work area
 - Emergency equipment, exits, first aid stations, etc.
 - Health & Safety board and postings
- **Training in the following areas:**
 - Review of assigned job activities
 - Review of operating instructions for equipment/process
 - Review of hazards and controls
 - Review of any safe operating procedures/safe work instructions
 - Time frames for training completion
- **Specific training programs:**
 - Complete assigned in-house training modules based on job position
 - Complete any third-party training as required to meet provincial requirements or determined by OHSA

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ROLES AND RESPONSIBILITIES

Senior Management will:


- Assume ultimate responsibility for the development and implementation of an effective Health & Safety Orientation Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Health & Safety Orientation Program.
- Purchase the required printed materials and training needed to support the Health & Safety Orientation Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Participate in the King Paving & Construction Health & Safety Orientation annually.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure the requirements as defined in Section 25 and 26 of OHSA are completed.

Senior Project Managers will:

- Approve all hiring and promotions of workers.
- Participate in the King Paving & Construction Health & Safety Orientation annually.
- Follow the hiring and onboarding process established by the Payroll & Health & Safety Departments.
- Advise all departments including Payroll, and the Health & Safety Department once an offer has been accepted.
- Verify the candidate holds a valid Working at Heights certification. Proof of valid driver's license may be required depending on the position of employment.
- Be involved with corrective or disciplinary actions where required

Foremen/Supervisor/Managers/Superintendents will:

- Ensure that workers receive site specific health and safety orientation once assigned to a jobsite using the designated orientation form. A signature is required by the individual completing the site safety orientation and the person receiving the orientation.
- Attend and be familiar with all health & safety training programs required by workers under their supervision.
- Participate in the King Paving & Construction Health & Safety Orientation annually.
- Complete the Ministry of Labour Health and Safety Awareness for supervisors in 5 steps within 7 days of assuming the role of Supervisor
- Monitor worker's performance to ensure the skills and knowledge are put into practice and for modifying training as needed.
- Maintain site specific training materials such as Health & Safety binders.
- Communicate aspects of the program standard applicable to their work operations to those newly hired workers and workers with new tasks or equipment who report to them (e.g., toolbox talks, staff meetings,

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training sessions, posting in the workplace). All new workers will be informed that they may not work alone

Workers will:


- Participate and complete all assigned training including the Ministry of Labour Health and Safety Awareness for Workers in 4 steps within 7 days of being hired.
- Follow the policies and procedures as outlined in the training program.
- Participate in the King Paving & Construction Health and Safety Orientation annually.
- Report any violations of the OHSA, any defective equipment, or any workplace hazard to the employer or Supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Provide evidence of training records when requested by either the Company or third parties including Ministry of Labour.
- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures.
- New and Short Service Employees are not allowed to work alone.

Joint Health & Safety Committee members will:

- When consulted, provide input for the development and updating of both health & safety orientation and job-specific health & safety training programs.
- Maintain current joint health and safety committee membership lists and post them prominently in their workplaces.
- Both Management and union members of joint health and safety committees should be encouraged and permitted to take part in the health & safety orientation.
- Review and make recommendations on the health & safety orientation and job specific health & safety training programs within the area of their responsibility.
- Participate in the King Paving & Construction Health and Safety Orientation annually.

Health & Safety Department will:

- Assign the required training materials including online programs of job specific training.
- Complete onsite orientation when required.
- Participate in and/or facilitate the King Paving & Construction Health and Safety Orientation annually.
- Develop and deliver on a regular basis, generic health & safety training programs to assist departments in meeting their responsibilities under this policy.
- When developing new training programs and revising existing programs, build in participant evaluations, either written and/or practical.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Promote feedback and recommendations from employees.

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- Provide consultation in the design and/or delivery of health & safety orientation and job-specific health & safety training programs, in accordance with the accompanying training standard, in conjunction with the respective joint health and safety committee.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Make the training records available to departments, the joint health and safety committee, and the Ministry of Labour, upon request.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.

TRAINING/RECORD KEEPING

All workers of King Paving & Construction Ltd. who are required to complete Health & Safety Orientations will be trained in how to complete the different components of the onboarding process.

Training records will be maintained by the Health & Safety Department for a period of three years.

Annual training awareness for this program may be completed through any of these different forums:

- Health & Safety Day
- New Hire Orientation
- Toolbox talks
- Management Meetings
- JHSC Meetings
- Specific training courses through external providers

Training records will be maintained by the Health & Safety Department in SiteDocs.


Training awareness updates will be completed every three years.

COMMUNICATION

Communication of this program with regards to the roles and responsibilities will be completed through any of the following forums:

- Scheduled safety meetings
- Safety communication board postings
- Employee orientation
- Subcontractor orientation
- Toolbox talks
- Specific training courses

Records of communication will be recorded and stored using SiteDocs or other means when required.

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REFERENCES

New Worker Orientation Form (HSF 8.4)

Site Orientation for Workers (HSF 8.9) Subcontractors (HSF 4.0)

HSMS 8-01 Training Policy

HSMS 8-05 Communication Policy

Launching a Safe Start: A Worker's Guide

Prevention Fact Sheet to Developing a Workplace Health & Safety Policy and Program

Ministry of Labour Worker and Supervisor Awareness Training

CONTINUOUS IMPROVEMENT

This standard and process for the Health & Safety Orientation will be reviewed on an annual basis, jointly by Senior Management and JHSC.

Legislation updates will be reviewed to ensure the Health & Safety Orientation Standard meets the provincial Occupational Health & Safety Act and other governing legislation. If there are legislative or updates in the company policies, the document will be revised and approved.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the document maintenance and tracking log.

Networking and Peer Learning Policy	Issue Date: February 11, 2022	
	Revision Date: February 3, 2025	
Policy Number: HSMS 8-03	Revision Number: 004	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all employees, subcontractors, and visitors. The purpose of this policy is to provide written guidelines for the education and training requirements for our employees through an active networking and peer learning program.

Our goal is to ensure that all personnel can share their knowledge and experience and to learn from others through toolbox talks, networking and other peer learning events.

This policy works in conjunction with HSMS 8-05 – Communication.

SCOPE AND REGULATION

This policy pertains to all employees, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.

The policy will outline the roles and responsibilities that have been established and will be enforced as part of our due diligence. The policy will include:

- Roles and Responsibilities for Training and Communication
- Training Matrix
- Orientation and Review Checklist (Workers)
- Orientation and Review Checklist (Subcontractors)
- Safety Talk Form
- Occupational Health & Safety Act Part III, Section 25(2)(a)
- Occupational Health & Safety Regulation 213/91 Construction Projects


DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the company to whom the subcontractor is providing services for (e.g., King Paving & Construction Ltd.).

Networking and Peer Learning – An opportunity to communicate with individuals or organizations and to share information and experience to improve personal understanding regarding health and safety matters. This also extends to information shared between companies and organizations.

Safety Training – Safety training is a teaching tool used to help employees become more safety-conscious in all aspects of safety.

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REQUIRED RESOURCES:

- Personal and/or corporate memberships with organizations such as the HHCA, ORBA, HAND, OSWCA or a union.
- Access to or membership with networking sites such as Linked-In.
- Time and personnel to attend meetings and events held by the organizations listed above.
- Hosting the annual health and safety day and requiring attendance by all personnel.
- Access to the internet and email.
- Ability to use the outlook calendar.
- Funding to attend or host events and for charitable donations.
- Access to suitable venues where required.

NOTE: All training courses are an excellent way to network and learn from peers.

PROCEDURES

- The Company will ensure that the annual training goals and objectives are identified and communicated.
- It will be the Health & Safety Department's responsibility to track the annual goals and objectives to ensure completion.
- During the onboarding process, workers will be required to participate in and, when required, successfully complete all components of the Company Health & Safety Orientation.
- Through this process, the Company will ensure that the worker has adequate skills and training for the position for which they have been hired.
- Upon hiring, the Company will verify that any completed legislated training requirements are valid (i.e., WAH, MOL Health & Safety Awareness). If records are found to be non-compliant, the worker will be required to complete the current legislated training necessary.
- If a worker is found to be lacking in the required skills, arrangements will be made by the Health & Safety Department to either provide or arrange to have the necessary training provided.
- The Company will encourage networking and peer learning opportunities through associations such as the Regional Construction Group, ORBA and the HAND association.
- The Company will ensure that safety talks or toolbox talks are held each week. A topic will be selected by the safety department and sent out to all superintendents and foremen to ensure that the toolbox talks are consistent throughout the company.
- The safety department will send emails regularly throughout the organization to keep all personnel up to date on safety regulations, guidelines, standards, and recommendations.
- Networking and peer learning will be encouraged through and by the health & safety department, including exchanging safety information with other companies.
- Refreshers will be delivered to all workers on the annual Health & Safety Day or as necessary.

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ROLES AND RESPONSIBILITIES

Senior Management will:


- Assume ultimate responsibility for the development and implementation of an effective Networking and Peer Learning Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Training and Communication Program.
- Ensure that the Networking and Peer Learning program is being completed as required.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.
- Senior Management will review deficiencies and take actions to correct identified deficiencies.
- Ensure that training records are recorded and kept on file for a minimum of five years.
- Develop a written training schedule to identify the minimum standards required for training.
- Ensure workers are trained in the Legislated Health and Safety responsibilities and industry standards.
- Conduct and participate in monthly health & safety meetings with Management and continuous improvement will be reviewed on a quarterly basis.

Foremen/Supervisors/Managers/Superintendents will:

- Be knowledgeable of the training expectations and standards of the company.
- Communicate minimum training requirements and health and safety expectations on a project through a "Site Specific Worker Orientation" or "Site Specific Subcontractor Orientation".
- Keep accurate records of training delivered to workers onsite. This must be completed using SiteDocs.
- Engage in networking and peer learning opportunities when presented.
- All Supervisors and Foremen are required to complete the Basics of Supervision training. Newly hired or promoted Supervisors must complete the next available course with IHSA to meet the Company requirements for training.

Workers will:

- Participate in any safety meeting and/or training required by the Company.
- Upon completion, sign all records of training.
- Engage in networking and peer learning opportunities when presented.
- Comply, when required, to successfully complete a quiz or test to prove the transfer of knowledge.
- When required, provide written acknowledgement of receipt of information by signing either a hard copy form or an electronic form on SiteDocs.
- Always carry proof of training on their person while on the construction project sites.
- Work in a manner consistent with the Company and training expectations.
- Report any infractions of the Occupational Health and Safety Act and applicable regulations to your immediate Superintendent/Foreman.

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Subcontractors will:


- Ensure their workers are adequately trained as required by the Company.
- Be required to accept full responsibility for ensuring their workers are adequately trained as per the Occupational Health and Safety Act and other regulations as required.
- Provide proof of training for all workers on the job site. If a subcontractor or their worker(s) is/are found to have inadequate skills, Company Management or the Health & Safety Department may require the worker to leave the job site until proof of training can be provided.

Joint Health & Safety Committee members will:

- Work together with employees, the Health & Safety Department and Management to review the Networking and Peer Learning Program annually and make recommendations for continuous improvements.
- Comply with the Company requirement that all Joint Health & Safety Committee members must be certified Level 1 and the committee itself must have a minimum of two certified Level 2 worker members.
- Re-enforce compliance with the Training and Communication and the Networking and Peer Learning Programs in the workplace.
- When completing the monthly inspections, report any worker(s) to site Management who fail to comply with this policy.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplaces.
- Communicate the requirements of the Program and associated procedures with all relevant parties
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the program are embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Safety Day, Toolbox Talks or onsite training.
- Ensure new workers have adequate training assigned for the tasks they will be expected to perform.
- Ensure that the person conducting the orientation signs the New Employee Orientation form.
- Review the training records regularly to ensure that they are adequate, and that the worker training is current.
- Ensure all Health & Safety forms and records are completed and filed on SiteDocs.
- Ensure that additional training is provided for those promoted or for those individuals who assume responsibilities for a new position (e.g., JHSC).
- Present networking and peer opportunities to all pertinent personnel.
- Deliver or arrange for training when it is deemed a worker has inadequate training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.

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- Keep abreast of the updated legislation with regards to OSHA standards through industry education.
- Be responsible for updating the Policy on an annual basis with Senior Management and the JHSC.
- Complete required training to maintain program certification required to instruct training courses.
- Work with Senior Management to establish the agenda for the annual Health & Safety Day.

TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department, Management, or qualified third-party providers.

Certification training will be provided by competent and qualified third-party providers.

The Health & Safety Department will request a copy of the trainer's certification for the course being provided.

Ensure that networking and peer learning opportunities attended by a King employee have been recorded on SiteDocs.

The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training (where applicable) and expiry date.


The Company will ensure that any worker that has been absent from the Company for more than six months, will complete the full Company Orientation Program.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Networking and Peer Learning events.
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

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REFERENCES

Training Records

New Worker Orientation form (HSF 8.4)

Site Orientation – Worker (HSF 8.9) – Subcontractor (HSF4.0)

SiteDocs Construction JHA with Toolbox Talk (HSF 8.0)

Training Evaluation Feedback Form

Proof of attendance to networking and peer learning events

HSMS 8-05 - Communication

CONTINUOUS IMPROVEMENT

This policy and process for the Networking and Peer Learning Policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the Networking and Peer Learning Policy meets the Occupational Health and Safety Act, other governing legislation, and updated Company policies.

The amended Policy shall be kept as a record of review and the required changes.

The revision of the Policy shall be tracked on the bottom of the Policy and recorded on the document maintenance and tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy	WSIB Safety Excellence topic	Feb 11, 2022	000
Policy Update	Annual Review	Jan 10, 2023	001
Policy Update Added required resources section	Annual Review	Jan 15, 2024	002
Replaced eCompliance with SiteDocs	Change in safety platform	Nov 13, 2024	003
Referenced HSMS 8-05 – Communication, removed training statements that are covered in HSMS 8-01, added SiteDocs form numbers	Annual Review	Feb 3, 2025	004

Diversity, Equity & Inclusion Policy	Issue Date: March 1, 2023	
	Revision Date: February 3, 2025	
Policy Number: HSMS 8-04	Revision Number: 003	
	 Approved By: President	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to fostering a work environment that is inclusive, equitable and diverse. Our aim is to ensure that our work environment is one where we celebrate differences; where each employee is treated fairly and is respected for those differences; and where every team member has an equal opportunity to contribute to the success of our company and reach their full potential. This commitment stems from our most senior leaders and includes every member of our team.

SCOPE

This policy applies to all current employees (full-time, part-time, contractual, permanent, and temporary) of King Paving & Construction Ltd., and it extends to our treatment of vendors and suppliers, subcontractors, visitors, customers, and job applicants.

DEFINITIONS

Diversity – Refers to the differences in the structure of our staff and crews, including age, race, color, national or ethnic origin, family or marital status, sex, gender identity or expression, sexual orientation, language, physical and mental ability, genetic characteristics, political affiliations, religion, socio-economic status, and other characteristics that make our employees unique.


Equity – Means ensuring fair access to all employment opportunities for everyone, regardless of diversity or difference. Equity addresses the effects of colonization, economic and social disparity, and injustices against marginalized groups. It also addresses systemic barriers to access and participation in employment opportunities, sometimes through practices that may not appear to be 'equal'.

Inclusion – Is the process through which the company builds community and where employees and the company at large experience the benefits of diversity. Inclusion provides everyone with the right to participate in our workplace.

COMMITMENTS

As a company, King Paving & Construction Ltd. is committed to:

- Creating an environment where the individual differences and contributions of all employees are recognized and valued.
- Maintaining a work environment that promotes dignity and respect for every employee.
- Attracting and retaining a skilled and diverse workforce that best represents the talent that is available within the communities in which we operate.
- Ensuring all selection-based criteria are appropriate and based on diverse skills, experience, and perspectives when both hiring new staff and promoting current team members. Selecting team members for new jobs or promotions based solely on merit.

Diversity, Equity & Inclusion Policy	Issue Date: March 1, 2023	
	Revision Date: February 3, 2025	
Policy Number: HSMS 8-04	Revision Number: 003	
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- Regularly reviewing and updating as required all employment practices and policies that do not support the intention behind this policy – including, but not limited to: recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; terminations; and the ongoing development of a work environment built on the premises of diversity, equity, and inclusion.
- King Paving & Construction is committed to developing respectful, sustainable and mutually beneficial relationships with Indigenous/aboriginal people and communities.
- Reviewing diversity statistics on an ongoing basis to ensure representation of our communities within and at all levels of our workforce.
- Complying with all associated legislation requirements.
- Always encouraging respectful communication.
- Actively discouraging, and addressing through appropriate disciplinary action, any forms of intimidation, bullying, victimization, vilification, or harassment that result from or are contrary to the intentions of this policy.

ROLES AND RESPONSIBILITIES

Senior Management will:


- Assume ultimate responsibility for the development and implementation of a Diversity, Equity & Inclusion Policy.
- Allocate appropriate resources, training and employees to implement and maintain the Diversity, Equity & Inclusion Policy.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Understand their role in promoting diversity, equity, and inclusion within our company.
- Act in accordance with this policy.
- Actively discourage and address any actions that are contrary to this policy.
- Review deficiencies and take actions to correct the identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Understand their role in promoting diversity, equity, and inclusion within our company.
- Act in accordance with this policy.
- Actively discourage and address any actions that are contrary to this policy.

Workers will:

- Always treat all employees with dignity and respect.
- Act in accordance with this policy.
- Identify and bring forward any situations that are contrary to this policy.

Diversity, Equity & Inclusion Policy	Issue Date: March 1, 2023	
	Revision Date: February 3, 2025	
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Health & Safety Department will:

- Keep current regarding any changes or updates to regulations and update this policy to reflect these changes.
- Review the Diversity, Equity & Inclusion policy annually and ensure that senior management has reviewed and approved the policy.

COMPLAINTS

It is the expectation of King Paving & Construction Ltd. that all employees adhere to the commitments outlined in this policy. Should you witness any breach of this policy, please advise the Health & Safety Department immediately.

If you are personally in violation of any commitments or the general intention of this policy, disciplinary action, up to and including termination, may be taken. The disciplinary action will be in direct correlation to the nature and extremity of the violation.

This policy works in conjunction with HSMS 13-12 Workplace Violence and Harassment Policy and HSMS 13-13 Workplace Violence and Harassment Procedure.

REPRISALS

Any employee who files a valid complaint in accordance with this policy will not be subject to any form of retaliation either direct (e.g., dismissal or demotion) or indirect (e.g., being passed over for a promotion).


TRAINING/RECORD KEEPING

Training shall be arranged and provided by the Health & Safety Department and will take place during King Paving & Construction Orientation.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Toolbox talks
- Company emails
- Annual safety day
- Written correspondence regarding suspected substance abuse
- Incident Reports

Diversity, Equity & Inclusion Policy	Issue Date: March 1, 2023	
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	<p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Approved By: President</i></p>	

Records of communication will be recorded and stored using SiteDocs or other means when required.

EVALUATION & CONTINUOUS IMPROVEMENT

This policy for Diversity, Equity & Inclusion will be reviewed annually jointly by Senior Management and the JHSC.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy		March 1, 2023	New
Reviewed Policy	Annual Review	Jan 15, 2024	001
Replaced eCompliance with SiteDocs	Change in safety platform	Nov 13, 2024	002
Corrected Grammatical Errors and Referenced HSMS 13-12 Workplace Violence and Harassment Policy and HSMS 13-13 Workplace Violence and Harassment Procedure in the "complaints" section of this policy	Annual Review	Feb 3, 2025	003

Communication Policy	Issue Date: February 4, 2025	
	Revision Date: New	
Policy Number: HSMS 8-05	Revision Number:	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction Ltd. believes that on-going and two-way communication plays an essential role in maintaining a safe & healthy workplace.

We are committed to removing any information barriers by communicating all updated health & safety information with all parties. In doing so it helps our employees make the right decisions when it comes to health and safety issues or concerns.


SCOPE

This policy pertains to all employees, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.

PREREQUISITES

As per element 8 of the COR audit, King Paving & Construction has a written procedure for communication that includes:

- a) Roles and responsibilities are outlined in the responsibilities section of this procedure.
- b) Senior management holds regularly scheduled company-wide safety meetings with all employees that include the Occupational Health and Safety Management System and its implementation at least annually. KPC holds a company-wide annual safety day prior to the start of the spring season which includes all workers, supervisors, managers, and various subcontractors. The annual company-wide safety day typically takes place in March each year.
- c) Communication delivered in a manner that is understood by the receiver of the message and considers ability, language, and literacy. KPC communicates via in-person learning, emails, memos, and toolbox talks. Where literacy is an issue, KPC ensures understanding by administering oral quizzes.
- d) Opportunity for input from workers. KPC values input from all personnel. During training sessions and daily JHA meetings, workers are asked for their input regarding the tasks of the day. This input is to be logged on to the daily JHA and weekly toolbox talk forms located on SiteDocs.
- e) Receiving, documenting, and responding to internal and external Occupational Health and Safety communications. Daily JHA meetings take place on site along with weekly toolbox talks. All personnel are required to sign off on SiteDocs. Any concerns or recommendations are to be listed as an action item on the SiteDocs document and the responsibility to follow through on the action item will be assigned to the appropriate person such as a foreman, superintendent, or the health & safety department. Detailed information regarding internal & external communications can be found in the Communications section of this policy.
- f) Tailgate or toolbox talks or their equivalent. King Paving & Construction holds toolbox talks every Tuesday. The health & safety department ensures consistency by developing and sending out the topics that are to be covered. The toolbox talk is sent out to all supervisors and office personnel on Thursday or Friday prior to the week that the toolbox talk will be conducted.

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- g) Specific forms for recording attendance, agendas, meeting minutes and toolbox talks. Toolbox talks, foremen's meetings, JHSC meetings and Senior Management meetings are documented on SiteDocs. Agendas are created and meeting minutes are taken and submitted to SiteDocs. Superintendent meeting minutes are taken and stored on the company shared drive.
- h) Requirement to maintain records. King Paving & Construction has a requirement to maintain all records of meetings, training sessions and other forms of communication. Specific forms are used and submitted to SiteDocs. Refer to HSMS 1-03 Document and Record Control.

INTERNAL COMMUNICATION PROCESS

There are several modes of internal communication within King Paving & Construction. The following is a list of common internal communication techniques along with the processes associated with them:


Emails and Memos: Originate from one sender and can either be directed to one person, a specified group of people, or can be companywide. The sender generally keeps the original email or memo in a sent folder however, duplicate copies can be kept in specific files on the shared drive if it is required for future use.

Superintendent Weekly Meetings: Superintendent meetings take place on a weekly basis (usually on Thursday) from April through to December. These meetings are held both in person, and by Zoom. The minutes of these meetings are kept in a folder on the company shared drive and are also sent out prior to the next meeting. Invitations to these meetings are sent out via email notification.

JHSC Meetings: JHSC meetings are held on a quarterly basis and are co-chaired by one management representative and one worker representative. An agenda for the meeting is created and presented at the start of the meeting. An email notification is sent out to all JHSC members several weeks in advance to confirm the date and time of the meeting and their attendance. The meeting minutes and recommendation forms are submitted to SiteDocs, stored in the JHSC folder on the shared drive and sent to the company president. The recommendation forms require the signature of the president and follow-up by the committee. Meeting minutes are also distributed to all foremen for their health & safety binders and to any health & safety boards on sites.

Senior Management Health and Safety Review Meetings: The senior management health and safety review meetings are held on a quarterly basis. The safety department generates a quarterly report which includes statistical data and action plan updates. An agenda is presented at the start of the meeting and is stored on the shared drive. The minutes from the meeting are submitted to SiteDocs and stored on the company shared drive in the senior management meeting folder.

Daily JHA Meetings: Daily JHA meetings are held every morning at each site to discuss the hazards and control measures that will be put in place to protect the workers. Each worker is required to sign the JHA meeting form which is submitted to SiteDocs by the foremen. Any recommendations to improve safety are documented in the daily JHA and reviewed by the safety department.

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Weekly Toolbox Talk Meetings: Toolbox talks are generally held at each site on Tuesday mornings, or on Wednesday mornings if Monday is a holiday. The toolbox talks, which are created by the safety department, are sent to all foremen, superintendents and office personnel on the previous Thursday or Friday via SiteDocs. All personnel who receive the toolbox talk read the topic and sign as acknowledgement. All field workers are required to sign the weekly JHA with toolbox talk form on SiteDocs to acknowledge their participation.

General Meetings: General meetings are held for a variety of reasons. The minutes to safety related meetings are submitted to SiteDocs and stored in the appropriate folder on the company shared drive.

Estimating Meetings: The estimating meetings are held weekly (depending on workflow) during the regular season. These meeting minutes are stored in the appropriate folder on the company shared drive.

Safety Orientation Meetings: As per HSMS 8-01 Training, all new employees are required to take part in the King Paving & Construction health and safety orientation program. Upon completion of the training, a new worker safety orientation form is filled out on SiteDocs and acts as proof of participation. A similar safety orientation meeting is held with all subcontractors that are new to the site. A safety orientation meeting takes place between the superintendent and the subcontractor. Upon completion of the orientation, the subcontractor will sign the subcontractor orientation form which is submitted to SiteDocs. A company-wide safety orientation takes place at our annual health & safety day.


Annual Health & Safety Day: King Paving holds an annual health and safety day before the beginning of our active season. On this day, amongst many topics, the audit results, company goal results & new goals are presented. There is also a myriad of training that happens depending on the needs for that particular year but always includes WHMIS refresher training and safety orientation training.

Incident Reports, Near Misses and Investigations: When an incident, injury, or near miss occurs, an incident or other pertinent form (such as first aid, theft, utility hit) is filled out on SiteDocs which includes signature requests from a person in authority who will receive notification via email, or through the SiteDocs application. Action items and other corrective items are tracked through SiteDocs as to their status. The same hold true for investigations.

Inspections: Various inspection forms such as vehicle pre-trips, site safety inspections, and equipment inspections are filled out on Site Docs and signed by the appropriate personnel. Notifications are sent through SiteDocs and email to all personnel who have had their signature requested.

Return To Work and Modified Duties Plans: Due to the confidential information contained in this correspondence, much of the documentation is in paper form which is kept in a secure area by the health and safety officer.

Please note: all forms, records and documents are maintained as per HSMS 1-03 Document and Record Control.

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EXTERNAL COMMUNICATION PROCESS

There are several modes of external communication between King Paving & Construction and outside sources. The following is a list of common external communication techniques along with the processes associated with them:

Emails and Memos: Originate from one sender and can either be directed to one person, a specified group of people. The sender generally keeps the original email or memo in a sent folder however, duplicate copies can be kept in specific files on the shared drive if it is required for future use. If the email contains information that pertains to a specific job or subcontractor, the email may also be stored in the correspondence or subcontractor file on the company shared drive.

Communication with the Ministry of Labour, Immigration, Training & Skills Development and Ministry of Environment: When a MLITSD officer or M.O.E. inspector visits a site, he/she will ask to speak with a supervisor and a worker safety representative. Upon completion of their inspection or initial investigation, the inspector will issue a field visit report which requires the signature of the worker representative and a supervisor. The superintendent must keep the report posted at the site for a minimum of 21 business days. The superintendent will create a digital copy of the field visit or investigation report and email it to the safety department for follow-up. The digital copy will be placed in the pertinent folder on the company shared drive.


Communication with the WSIB: Communication with the WSIB may take place by telephone or email, however, most commonly, communication takes place through the WSIB web portal. This is due to the sensitive and confidential nature of the information. The WSIB claims portal can only be accessed by authorized personnel such as the safety officer, safety coordinator and the payroll administrator. Please note that the WSIB also sends some correspondence via regular mail. These documents are kept in a secure location.

Please note: all forms, records and documents are maintained as per HSMS 1-03 Document and Record Control.

ROLES & RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Communication Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Communication Program.
- Ensure that the Communication Program is being completed as required and records are available.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.

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- Review deficiencies and take actions to correct identified deficiencies.
- Conduct and participate in monthly health & safety meetings with Management and continuous improvement will be reviewed on a quarterly basis.

Foremen/Supervisors/Managers/Superintendents will:

- Communicate minimum training requirements and health and safety expectations on a project through a "Site Specific Worker Orientation" or "Site Specific Subcontractor Orientation".
- Communicate site hazards & controls during the daily JHA.

Workers will:


- Participate in any safety meeting and/or training required by the Company.
- Participate in the company health and safety orientation annually.
- When required, provide written acknowledgement of receipt of information by signing either a hard copy form or an electronic form on SiteDocs.
- Report any infractions of the Occupational Health and Safety Act and applicable regulations to your immediate Superintendent/Foreman.
- Report any site hazards to the Superintendent/Foreman.

Joint Health & Safety Committee members will:

- Work together with employees, the Health & Safety Department and Management to review the Communication Program annually and make recommendations for continuous improvements.
- Participate in the company health and safety orientation annually.
- Re-enforce compliance of the Communication Program in the workplace.
- When completing the monthly inspections, report any worker(s) to site Management who fail to comply with this policy.
- Communicate the minutes of the quarterly meetings.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplaces.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the program are embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Safety Day, Toolbox Talks, or onsite training.
- Ensure all Health & Safety forms and records are completed and filed on SiteDocs.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.

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- Keep abreast of the updated legislation with regards to OSHA standards through industry education.
- Be responsible for updating the Policy on an annual basis with Senior Management and the JHSC.
- Work with Senior Management to establish the agenda for the annual Health & Safety Day.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails & telephone calls
- Annual safety day

REFERENCES

Occupational Health and Safety Act Construction and Industrial Regulations

HSMS 5-01 Company Rules Policy

HSMS 1-03 Document and Record Control

New Worker Orientation form (HSF 8.4)

Site Orientation – Worker (HSF 8.9) – Subcontractors (HSF 4.0)


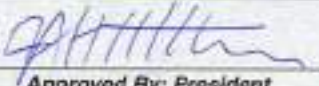
SiteDocs Construction JHA with Toolbox Talk (HSF 8.0)

EVALUATION AND CONTINUOUS IMPROVEMENT

This policy and process for the Communication Policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the Training and Communication Policy meets the Occupational Health and Safety Act, other governing legislation, and updated Company policies.

The amended Policy shall be kept as a record of review and the required changes. The revision of the Policy shall be tracked at the bottom of the Policy and recorded on the maintenance and tracking log.

Workplace Inspection Policy	Issue Date: January 31, 2016	
	Revision Date: February 5, 2025	
Policy Number: HSMS 9-01	Revision Number: 011	
	 Approved By: President	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to conducting workplace inspections in compliance with the Occupational Health and Safety Act and applicable regulations. These inspections are conducted to identify, monitor, follow up and control or eliminate all hazards.

The company will ensure that all locations and sites where work is being performed undergo workplace inspections including vehicle and equipment pre-use inspections as per frequencies established in this policy. Inspections will be completed and documented by applicable personnel and will identify deficiencies and corrective actions taken or scheduled & follow up when necessary.

SCOPE

This policy applies to all personnel of King Paving & Construction Ltd., which includes workers, subcontractor(s) and management personnel that are required to perform workplace inspections as part of the roles and responsibilities for the Company.

DEFINITIONS

Workplace Inspection – A documented physical inspection of the company premises that would include all areas of the workplace including construction sites, company equipment and other company owned assets.

Inspection Frequency – Established criteria for inspections as outlined in the Occupational Health and Safety Act and recommended manufacturer specifications.

Worker Rep – A worker who is selected by workers at the workplace who does not exercise managerial functions or by the union where the workplace is unionized.


IRS (Internal Responsibility System) – Established joint responsibility between workers and management to ensure a safe work environment. Every worker who sees health and safety concerns such as hazards in the workplace has a duty to report the situation to management. Once the hazard is reported, management and the supervisor have a duty to review the problem and better the best means available to either eliminate or reduce any hazard that could injure workers.

Hazard – Is the potential to cause harm or adverse effect on workers in the workplace.

Risk – Is the chance or probability that a person will be harmed or experience an adverse health effect if exposed to a hazard. It may also apply to situations with property or equipment loss, or harmful effects on the environment.

Near Miss – Is an unintentional incident that could have caused damage, injury or death but was narrowly avoided. In the context of safety, a near miss may be attributed to human error, or might be a result of faulty safety systems or processes in an organization.

Risk Control – Is the method by which firms evaluate potential losses and take action to reduce or eliminate such threats.

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APPLICABLE FORMS

The forms used in the inspection process are as follows:


- Operator's Daily Pre-Shift Inspection (HSF 9.3)
- Inspection – All Company Vehicles (HSF 9.8)
- CVOR Schedule 1 Daily/Pre-Shift Inspection (Booklet in vehicles)
- Senior Management Monthly Site Inspection Report (HSF 9.6)
- Superintendent Monthly Inspection (HSF 9.7)
- Foreman's Weekly Inspection (HSF 9.0)
- Near Miss Report (HSF 10.3)
- H&S Only Inspection Form (HSF 9.1)
- JHSC Monthly Site Inspection or Super/JHSC Monthly Site Inspection (HSF 9.2)
- P.P.E. Inspection Form (HSF 9.1)
- Paving Weekly Site Inspection (HSF 9.4)
- Emergency Preparedness Drill (HSF 11.4)
- Equipment Inspection (9.5)
- Superintendent Pre-Start Hazard Assessment & Emergency Site Plan (HSF 2.3)

NOTE: The inspection forms listed above contain specific checklists of items to be inspected.

These inspection reports will be completed using SiteDocs.

REQUIREMENTS

- a) The roles and responsibilities regarding inspections are stated in the responsibilities section of this procedure.
- b) KPC has the requirement to conduct and keep records for workplace inspections including identifying corrective actions and preventing potential non-conformities. Refer to HSMS 1-03 Document and Record Control for specific details regarding who fills out the inspection forms, the frequency of which inspections are to be completed and where the inspection forms are maintained and stored. All supervisory personnel and the JHSC have been instructed to use the "action item" feature of the relevant SiteDocs inspection form. Action items list the potential non-conformities and corrective actions that are to be taken. The action item will be assigned to the appropriate person for follow-up to ensure that the non-conformity has been corrected, and relevant personnel are notified. Also refer to the Inspection Frequencies section of this procedure.
- c) KPC has the requirement to conduct and keep records for pre-use inspections of vehicles, machines, tools, and equipment. The records must also contain the corrective actions taken. Non-conformities are to be listed as action items on the SiteDocs inspection form and assigned to the appropriate person for follow-up (i.e., King Truck Repair, Health & Safety Officer, etc.). Inspections are to be conducted as per HSMS 7-01 Preventative Maintenance Policy, HSMS 1-03 Document and Record Control, SWP – CVOR


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Inspections, SWP Fire Extinguishers – How to Conduct a Monthly Inspection, SWP Inspecting portable power tools, SWP – Inspecting Company Equipment, SWP – Inspecting rental Equipment, and all other safe work procedures where equipment, tools or other conditions are to be inspected.

- d) The frequency of required inspections along with who is responsible for conducting them is listed on the chart in this procedure.
- e) Workers are required to participate in the inspection process as it pertains to their duties (i.e., pre-use inspections, JHSC inspections, etc.).
- f) King Paving & Construction has the requirement to meet or exceed all legislation and manufacturers' requirements such as the Ontario Occupational Health and Safety Act, O. Reg 213/91 Regulations for Construction Projects, O. Reg 851 Regulations for Industrial Establishments, The Highway Traffic Act, Ontario Book 7, and First Aid Regulation 1101. Applicable legislation is listed in each procedure and safe work practice.
- g) A list of what must be inspected along with the frequencies of inspections is listed on the chart in this procedure. Each type of inspection (site inspection, pre-use inspection, JHSC inspection, Superintendent inspection, Foreman inspection, Senior Management inspection, power tool inspection, etc.) has its own checklist on SiteDocs which lists what must be checked while conducting the inspection.
- h) Specific forms are used for recording workplace and pre-use inspections. These forms are on SiteDocs and are to be filled out by the person conducting the inspection. Please note: If a worker does not have access to SiteDocs, a JHSC member or their foreman may fill out the form on their behalf. When this is the case, the JHSC member or foreman must include the name of the person who conducted the inspection and have them sign off.
- i) KPC has the requirement to communicate inspection results to Senior Management and other relevant workplace parties. All inspection records are kept on SiteDocs and must be signed by a supervisor or Senior Management.

RESOURCES REQUIRED:

- Access to SiteDocs for all personnel who conduct inspections.
- Competent Inspectors (for site inspections and equipment inspections).
- Access to various SiteDocs inspection report forms as listed in the "applicable forms" section.
- Time to be allotted for personnel conducting inspections.
- Knowledge of equipment to be inspected (equipment, fire extinguishers, first aid kits, vehicles, and sites).
- Procedures regarding how to conduct the inspections listed above.
- Knowledge of hazard assessments.
- Cell phones/tablets/l-pads with internet or data access.
- Knowledge regarding how to use the "action items" feature on the SiteDocs forms.
- Knowledge regarding the legislative requirements regarding P.P.E., frequency of inspections, first aid kits, fire extinguishers, harnesses, confined space equipment, traffic control, hazardous products, and hygiene.

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- P.P.E. that is required to conduct an inspection that is specific to the site and/or equipment.
- Access to the Progressive Discipline Report books.
- Access to the superintendent's daily logbooks when required.
- A schedule listing the frequency of inspections to be conducted. This is listed below in the Frequencies section of this policy.

COMMUNICATION & TRAINING

All workers of King Paving & Construction Ltd. who are required to complete inspections will be trained in how to complete workplace inspections that pertain to the scope of work being performed.

Pre-inspections are required of all equipment including hand tools, vehicles, heavy equipment, and other devices used in the workplace.

Training records will be maintained by the Health & Safety Department.

Training awareness updates will be completed every three years.


Any subcontractors that perform work for the Company must provide proof of training for their workers during the prequalification process. Subcontractor(s) and their workers are required to comply with the pre-inspection policy.

Communication of the inspection requirements will be completed by any of the following: toolbox talks, safety meetings, JHSC meetings or other means as required by the Health & Safety Department. Records of communication will be maintained in SiteDocs and/or the company shared drive.

INSPECTION FREQUENCIES

All levels of management have a responsibility to perform workplace inspections. Based on the position in the organization. The frequency of inspections is as follows:

POSITION	FREQUENCY	LOCATION
Worker/Operator	Pre-use of Tools/Equipment – daily	Active job locations
Foreman	Daily JHA & Weekly Site Inspection	Active job locations
Superintendent	Pre-Start Hazard Assessment & Emergency Site Plan and Monthly Site Inspection	Active job locations
JHSC Worker Rep	Monthly	Active job locations

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JHSC Management Rep	Monthly	Designated job locations
Health & Safety Dept.	Monthly	Designated job locations
Vehicle Operators	Daily	Company vehicles
Senior Management	Quarterly	Active job locations

People completing inspections have the following responsibilities:

- Ensure that a pre-determined schedule has been established.
- Observed hazards, substandard acts or conditions are corrected immediately if possible.
- Notify Management of the identified hazards in the area and record on inspection form.
- Use the appropriate inspection form on SiteDocs.


Upon completion of the inspection:

- The inspector will identify time frames to correct identified hazards based on the level of hazard. These timeframes are subject to review by management.
- Management must review the completed inspection form and approve using SiteDocs.
- If corrective action is required, complete the form and initiate action item on SiteDocs.
- JHSC members will review the completed reports and make recommendations.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Workplace Inspection Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Workplace Inspection Program.
- Inspect a workplace or site at least once per quarter.
- Provide active support for activities associated with the Workplace Inspection Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.

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Foremen/Supervisor/Managers/Superintendents will:



- Work together to eliminate workplace hazards and to prioritize safety concerns.
- Advise the Health & Safety Department of any safety concerns that cannot be easily rectified by onsite personnel.
- Inspect their work site in accordance with the frequency schedule in the "frequencies" section of this policy.
- Perform random audits on their job sites to ensure compliance with the inspection policy.
- Schedule workers who are required to complete inspections adequate time to meet compliance.
- Complete the required inspections as identified in the inspection frequency chart (O. Reg. 213/91, s. 14(4), at least weekly or more if deemed necessary.
- Take corrective action to rectify deficiencies found in the workplace or jobsites.
- Report any technical issues with SiteDocs that would prevent compliance with this policy.
- Ensure workers have access to devices to record Near Misses to identify site hazards. Near Miss reports completed with SiteDocs will be automatically filed with the Health & Safety Department for review.

Workers will:

- Report to their immediate Supervisor any potential or actual workplace hazards they come across during their workday and complete a Near Miss report.
- Complete a pre-use inspection of tools and equipment prior to commencing work as per Reg. 213/91, section 93(3) and 94(1), (2).
- Take all reasonable precautions to minimize risk in the performance of their duties.
- Work with leadership to eliminate workplace hazards and exercise appropriate due diligence.
- Use the provided workplace checklists and inspection forms.
- Complete tagout procedures for any equipment or tools that are found to be deficient.
- Report any safety concerns to the JHSC.

Joint Health & Safety Committee Members will:

- Work together with workers and Management to eliminate workplace hazards, exercise appropriate due diligence, and prioritize safety concerns daily.
- Participate in JHSC certification training as assigned.
- Inspect their workplace at least once per month and use designated forms on SiteDocs to complete the monthly inspections.
- Correct any minor deficiencies found during the inspection process.
- Review the prior period's inspection report to review any outstanding deficiencies and make recommendations to management.

Workplace Inspection Policy	Issue Date: January 31, 2016	
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Health & Safety Department will:

- Review the completed inspection reports and ensure all required inspections are completed as per the inspection frequency chart.
- Provide an inspection compliance report overview to Management at the quarterly safety meeting.
- Complete an independent workplace inspection monthly.
- Assist the Management team to identify gaps in compliance and create an action plan for improvement to meet established inspection frequencies.
- Maintain and protect all inspection records for the required amount of timeframe established by the governing jurisdiction.
- Attend training or educational sessions to keep abreast of current legislative changes and requirements. Update Management of any required changes to this policy.

EVALUATION

This policy and process for workplace inspections will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislation updates will be reviewed to ensure the inspection policy meets provincial requirements.

The amended policy shall be kept as a record of review and the complete amendments.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance tracking log.

Housekeeping Policy	Issue Date: September 23, 2020	
	Revision Date: February 5, 2025	
Policy Number: HSMS 9-02	Revision Number: 006	
	 Approved By: President	

POLICY STATEMENT

The goal of this policy is to ensure that all King Paving & Construction sites are managed in accordance with the Housekeeping Policy.

SCOPE AND REGULATION

This policy pertains to all workers as well as subcontractors, visitors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.

DEFINITIONS

Housekeeping – keeping work areas neat and orderly, maintaining halls and floors of slip and trip hazards, and removing of waste materials (e.g., paper, cardboard) and other fire hazards from work areas and walkways.

RESOURCES REQUIRED:


- Knowledge of the housekeeping policy, procedures, and rules.
- Tools such as shovels, rakes, garbage bags and other items which may be required to implement this housekeeping policy.
- Time to be allotted each day for clean-up and general housekeeping.
- Disposal areas to be designated at each site.

STANDARD/PROCEDURE

Failure to comply with our housekeeping policy may result in the loss of revenue and/or site privileges for the Company, subcontractors, or their workers. The project Superintendent shall strictly enforce the housekeeping policy daily.

All workers and subcontractors shall ensure that their waste material and debris is removed to a disposal area and reusable material shall be removed to a storage area at least once a day or as often as necessary to prevent a hazardous condition from arising. **Disposal areas are to be designated by the King Paving & Construction project Superintendent.**

1. Work areas should be cleaned before, during, and after a task.
2. Make sure all cords and hoses are properly wound, and out of the walking path, and away from mobile equipment tires so they do not run over or stop on top of them.
3. Pick up all hand tools when you are finished using them. Do not leave them around as a tripping hazard. Ensure that tools are stored properly.

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4. Clean any spills immediately.
5. Dispose of any unused oil, cleaning supplies, or any other chemical properly.
6. Ask for help when lifting any object that is too heavy for one person.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Housekeeping Policy
- Allocate appropriate resources, training, and employees to implement and maintain the Housekeeping Policy
- Pay close attention to housekeeping issues when conducting site inspections
- Provide active support for activities associated with the Housekeeping Policy
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.

Foremen/Supervisors/Managers/Superintendents will:

- Always maintain clean and orderly work sites.
- Inspect the work site for good housekeeping
- Eliminate slipping and tripping hazards.
- Ensure that all emergency routes and pathways to emergency devices are kept clear of obstructions.
- Ensure that trash is cleaned and that the appropriate trash containers/bags are readily available.
- Stress the importance of good housekeeping to the workers.

Workers will:

- Follow the policy and procedures for housekeeping.
- Continuously monitor work areas
- Follow the practice of "clean as you go".

TRAINING/RECORD KEEPING


Workers will be trained on the Housekeeping Policy via toolbox talks.

Records of this training will be maintained via SiteDocs.

COMMUNICATION

Communication is to take place between all King Paving & Construction workers and subcontractors and with the site Superintendents.

Communication of this policy will be done through any of the following events:

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- Job Hazard Assessments
- New employee orientation
- Subcontractor orientation
- Toolbox talks
- Annual safety day
- Foreman Weekly Site Inspection (HSF 9.0)
- Superintendent Monthly Site Inspection (HSF 9.7)
- JHSC Monthly Site Inspection (HSF 9.2)

EVALUATION/REVIEW

This policy and for Housekeeping will be reviewed annually and jointly by Senior Management and JHSC.

The amended Policy shall be kept as a record of review and the required changes. The revision of the Policy shall be tracked at the bottom of the Policy and recorded on the maintenance and tracking log.

ASSOCIATED DOCUMENTS/FORMS

- SJP for housekeeping
- Housekeeping TBT
- Foreman Weekly Site Inspection (HSF 9.0)
- Superintendent Monthly Site Inspection (HSF 9.7)
- JHSC Monthly Site Inspection (HSF 9.2)

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy	New Policy	Sep 23, 2020	New
Update Policy	Annual Review	Jan 18, 2021	001
Update Policy	Annual Review	Jan 14, 2022	002
Update Policy	Annual Review	Jan 10, 2023	003
Update Policy Added Required Resources section Corrected grammatical errors	Annual Review	Jan 16, 2024	004
Replaced eCompliance with SiteDocs	Changed to new safety platform	Nov 13, 2024	005
Revised foreman responsibilities	Annual Review	Feb 5, 2025	006

Investigation and Reporting Policy	Issue Date: January 31, 2016	
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Policy Number: HSMS 10-01	Revision Number: 013	
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POLICY STATEMENT

This policy outlines the reporting and investigation procedures for King Paving & Construction Ltd. The Company will ensure that incidents and injuries are investigated and reported to the Workplace Safety and Insurance Board and/or the Ministry of Labour when required.

The objective of this policy is to establish a consistent means of recording incident/accident and investigation information into the cause of the accidents, incidents and near misses for the purpose of implementing controls to prevent future occurrences. This policy works in conjunction with HSMS 10-03 – Incident Reporting Guide.

SCOPE

This policy applies to management, supervisors, workers, H&S representatives or JHSC members, Payroll, and the Health & Safety Department.

Investigations are to take place for any of the following:


- Fatality
- Property damage/utility hits
- Fire
- Incidents
- Occupational illness
- Environmental release/spill
- Critical injury
- Lost time injury
- Health care
- First aid
- Vehicle/equipment accidents
- Certain Near Miss incidents

NOTE: The severity of the occurrence will determine how in-depth the investigation will be. For instance, a minor injury which is tended to on site will not require as deep of an investigation as would a more severe injury that requires the injured person to go to an emergency room.

DEFINITIONS

For this policy, the following definitions will be used.

Critical Injury – Section 1 of Ontario Regulation 834 under the OHSA defines "critical injury" as an injury of a serious nature that: places life in jeopardy, causes unconsciousness, results in significant blood loss, involves

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the fracture of a leg or arm, but not a finger or a toe, amputating all or part of an arm or leg, but not a finger or toe, consists of burns to major portion of the body, or causes loss of sight in an eye.

Clause 1(d) states that a "critical injury" includes the fracture of a leg or arm but not a finger or toe. The Ministry of Labour has clarified that it interprets the fracture of a leg or an arm to include the fracture of a wrist, hand, ankle, or foot.

In addition, while clause 1(d) excludes the fracture of a finger or a toe, the Ministry of Labour takes the position that the fracture of more than one finger or more than one toe does constitute a "critical injury" if it is an injury of a serious nature.

Clause 1(e) provides that a "critical injury" includes the amputation of a leg, arm, hand, or foot, but not a finger or toe.

While the amputation of a single finger or single toe does not constitute a critical injury, the Ministry of Labour interprets the amputation of more than one finger or more than one toe to constitute a "critical injury" if it is an injury of a serious nature.

Occupational Illness – Any time a person is over-exposed to a chemical, physical, biological agent or ergonomic condition that results in harm to the person's body.

Occupational Injury – Is work-related physical harm or damage to a person.

Fatality – Is a death.

LEGISLATION REFERENCE

Occupational Health and Safety Act – section 51-53, 9(31)

Occupational Health and Safety Regulation 213/91 – Construction Projects

Occupational Health and Safety Regulation 851 – Industrial establishments


Occupational Health and Safety Regulation 834 – Critical Injury – Defined

Ontario Highway Traffic Act Regulation 455/07

St. John Ambulance Training Manual

WSIA Regulation 1101


IHSA Construction Safety Manual, Chapter 4

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REQUIREMENTS

This King Paving & Construction policy has a written procedure for investigations and reporting that meets or exceeds legislative requirements and includes:

- a) Roles and responsibilities for workplace parties to report incidents, including near misses, for conducting investigations in a timely manner and for implementing corrective and preventative actions identified because of investigations. All personnel are to report incidents, unsafe acts, or conditions and near misses immediately to their foreman, superintendent and to the health & safety department. Once a report has been made, an investigation will be conducted by the foreman, superintendent and/or the safety department in a timely manner (preferably immediately). The investigation will include identifying and implementing corrective and preventative actions and documenting these actions on the investigation form(s).
- b) King Paving & Construction provides training in legislative and company specific reporting requirements and investigation procedures to all supervisory, JHSC members, and health & safety personnel.
- c) Upon an incident or near miss occurrence, immediate action must be taken to mitigate any additional consequences of the incident. When an incident or near miss is observed or reported, the foreman or Safety Representative will take immediate steps to mitigate the hazard and ensure that an incident report or near miss report is filled out on SiteDocs. The hazard will be listed and explained, and an action item will be created to identify, implement and track the corrective actions. In addition, if the identified hazard has the potential of creating additional consequences, those must also be identified and listed on the SiteDocs form. This may include shutting down the site in part or in full based on the results of the initial investigation.
- d) An investigation will include the determination of occupational health and safety deficiencies including the root causes of the incident.
- e) The investigation shall determine the requirements and implementation of corrective and preventative actions. Based on the initial investigation, the best possible corrective and preventative actions will be determined. These actions may include locking out a piece of equipment, shutting down the work on all or part of the site, securing the area where the hazard was observed, and contacting the health & safety department for guidance. In addition, the superintendent, foremen and safety representatives may consult the safety policies, safe work practices and safe work procedures for corrective and preventative actions that are specific to the tasks being performed and to the potential hazard that has been observed.
- f) Upon completing the investigation, the results of the investigation along with corrective and preventative actions will be communicated to workers & other interested parties. After an investigation, the foreman and/or safety rep will inform the affected workers on the site of the identified hazards and corrective and preventative measures that have been put in place. This will be recorded on the daily JHA meeting or generic meeting form and saved in SiteDocs. These forms will also ask the workers for any recommendations that they may have to enhance safety on the site. The results of investigations, corrective and preventative actions, and any other pertinent information will also be communicated during weekly superintendent meetings, quarterly JHSC meetings and quarterly senior management safety review meetings.

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- g) The investigation shall include a process for measuring the effectiveness of corrective and preventative actions. KPC requires that corrective and preventative actions are listed as action items on the SiteDocs forms (inspection forms and investigation forms). This serves the purpose of assigning duties, setting completion dates, and generating a management review and follow-up, thereby allowing the JHSC and health & safety department the opportunity to analyze and measure the effectiveness of corrective and preventative measures.
- h) Specific forms are used for the various types of investigations that may take place such as the worker incident report form, near miss report form, generic incident report form, accident investigation form and tap root cause analysis form. These forms are available on SiteDocs.
- i) King Paving & Construction maintains records of incident reporting and investigations on SiteDocs. When an incident or near miss occurs, an investigation will be conducted by the foreman, superintendent, JHSC members or the safety department who will utilize the appropriate form located on SiteDocs. Written or electronic reports will follow the process listed on the following chart. In addition, all documents and records will be maintained and stored in accordance with HSMS 1-03 Document and Record Control.

REQUIRED RESOURCES:

- Competent and trained personnel to conduct investigations.
- Knowledge of the requirements to conduct investigations in accordance with the Occupational Health and Safety Act.
- Access to SiteDocs and investigation forms.
- Witness statement forms.
- Cell phone or camera.
- Access to a tape measure.
- Access to caution/danger tape.
- First Aid kit.
- Eye Wash Bottle(s)
- Burn Kit
- Spill Kit
- Stretcher where required by Regulation 1101
- Personnel trained in First Aid.
- Emergency response contact list.
- Access to the Green Book and WSIA Regulation 1101.
- JHSC worker representative to conduct investigations.
- Guidance from the Health and Safety Officer.
- Cooperation from all personnel at the site or location.

LEGAL AND COMPANY REQUIREMENTS FOR REPORTING ACCIDENTS/INCIDENTS

The appropriate reporting form must be completed by the injured worker, witnesses, first aid responders, and other workers involved that have valuable input on what happened.

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The form should be completed on SiteDocs within 4 hours of occurrence.

Accidents, incidents, and occupational illnesses must be reported to the Ministry of Labour (as required)

Refer to the table that outlines the company's responsibilities to report:


Accident/Incident	Requirement	Timeline	To Whom
Fatality or Critical Injury	Notify directly by telephone	Immediately	MOL, JHSC/H&S Reps, Trade Union
Fatality or Critical Injury	Written Report	Within 48 hours	MOL reference R.S.O. 1990, c. 0.1, (s) 51 2011, c.1, Sched. 7, s.2(7)
Accident caused by explosions, fire or incident of workplace violence	Written Report	Within 4 days of occurrence	MOL, JHSC/H&S Reps, Trade Union
Injury (non-critical), Lost time injury, Medical Aid required	Written Report	Within 72 hours	WSIB, JHSC/H&S Reps, Trade Union
Occupational Illness	Written Report	Within 72 hours	WSIB, JHSC/H&S Reps, Trade Union
Accident resulting from a fire, explosion, flood, failure of equipment, machine, device, cave in or other prescriber accident that occurs on a project	Written Report	Within 48 hours	MOL unless a report under S 51 or no under S 52 has already been provided to MOL. Ref. 2011, c.1, Sched. 7, s.2(8). JHSC/H&S Reps, Trade Union

LEGAL REQUIREMENTS FOR REPORTING PRESCRIBED INCIDENTS

All prescribed incidents must be reported to the Health & Safety Department immediately.

All prescribed incidents listed below must be reported in writing to the MOL within two days and immediately by telephone:

- A worker falling a vertical distance of three meters or more.
- A worker becomes unconscious for any reason.

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- Accidental contact by a worker or by a worker's tool or equipment with a live electrical conductor or live electrical equipment.
- Contact by a backhoe, shovel, crane or similar lifting device or its load with an energized powerline rated at more than 750 volts.
- Structural failure of all or part of falsework.
- Structural failure of a principal supporting member, including a column, beam, wall, or truss of a structure.
- Failure of all or part of the structural supports of a scaffold.
- Structural failure of all or part of an earth or water retaining structure, including a failure of temporary or permanent support for a shaft, tunnel, caisson, cofferdam, or trench.
- Failure of a wall in an excavation or of similar earthwork.
- Overturning or the structural failure of all or part of a crane or similar hoisting device.

Notice of accident, explosion or fire causing injury:

- In the event of an accident involving fire or an explosion, the MOL must be notified within 4 days.
- In the event of an accident where a worker is not critically injured but requires medical treatment or is unable to perform their usual work, the Ministry of Labour must be notified within 4 days.
- Notices will be completed by the Health & Safety Department using the MOL occurrence report as required with all prescribed information.
- Copies of the report must be submitted within 4 days to the JHSC members and the trade unions.


Notice of Occupational Illnesses:

- When the company is advised that a worker has files with the Workplace Safety and Insurance Board (WSIB) that they have an occupational illness, the Ministry of Labour must be notified within 4 days.
- Copies of the report will be submitted within 4 days to the JHSC and the trade unions.

Procedures for Reporting a Vehicle Accident:

In the event of a vehicle accident involving a company vehicle, the following procedures should be followed:

- Stay calm, park safely.
- Assess the situation-evaluate your medical condition. Do not move if there is a possible neck/back injury.
- If you have warning devices, set them out.
- Wear Hi Vis clothing or use portable lighting if available when an incident occurs during low light conditions or poor visibility.
- Call the Police or 911 (if physically able). Insist on an incident report, no matter how minor the accident is.
- Be courteous. Answer Police questions. Give identifying information to the other party involved, but no comments about assuming responsibility.
- Assist injured parties, but do not move the injured unless a life-threatening situation exists.
- Provide any first aid, if physically able and/or if medical attention is needed and you are trained.

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- Protect yourself and the vehicle from further injury or damage, if physically able to do so. Direct traffic around the accident scene, move vehicle from roadway, when directed, position yourself away from the vehicle, if the vehicle cannot be moved.
- Report the accident to your supervisor.
- Identify yourself and the Company. Supply vehicle information such as CVOR, license and registration if asked.
- Do not discuss the accident with other driver(s) or witnesses.
- Ask all witnesses to give witness information.
- Comply with all legal paperwork, such as completing the "Vehicle Accident & Loss Report". Provide copies to the Health & Safety Department for manual reports only.
- If possible, include with the "Vehicle Accident & Loss Report", photographs taken from all four sides of vehicles involved in the accident, including the road or weather conditions, any skid marks, and the collision scene (i.e., intersection, parking lot, or other location). Include pictures of all license plates of vehicles involved in the accident.
- If applicable, return the manually completed report to the Health & Safety Department within 24 hours.

Treatment Log:

All accidents and injuries requiring a minimum of first aid treatment shall be recorded on the company's "First Aid Record" (HSF 10.0) on SiteDocs.

Injury information will include:


- Date of injury
- Type of injury
- Treatment required.
- Cause of injury
- Name of person providing treatment
- ESRTW plan implemented.

The Treatment Log will be reviewed at least monthly by management and provided to the JHSC for review.

Contact the Health & Safety Department within 4 hours of the incident:

Failure to manage an injury as required by the WSIB and/or the MOL may result in fines for the Company.

- WSIB Form 7 must be completed and submitted to the WSIB within 3 days of notification of the injury. Failure to submit it may result in a late filing charge of \$250.00.
- At all times when describing what happened, be sure to use terms such as "worker states" or "worker claims" since the information cannot be verified as accurate by the Company.
- Always include the following statement: "The Company reserves the right to revise this statement as a result of further investigation".

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- Management should always think of a Form 7 as a blank cheque. Do not allow Supervisors, workers or other support staff complete the form of the Company's behalf. The Health & Safety Department should always review the form prior to submitting it online.
- Never provide information that you know to be false. This is fraud and will be treated accordingly. There is a possibility of charges and/or fines to the person who signs the form.

Follow up:

- The designated ESRTW Coordinator must ensure that the claim is handled correctly to minimize the financial burden of the Company.


Begin the ESRTW Program:

- The onsite management must keep accurate documentation of all events related to the accident and injury(s) sustained by the worker.
- If the worker is injured, ensure that the worker has been provided with the ESRTW package and is aware of our modified work program. Workers must provide a Form 8 at the initial assessment and a Functional Ability form when requested when seen by a Health Care Provider.
- Only when a worker has provided the FAF stating that the worker is "Fit for regular duties" can the worker return to his/her regular work activities. Inform the WSIB that the worker has been cleared to return to work.

INVESTIGATION PROCESS

Investigations will consist of the following steps:

1. Collection of Information – This will be achieved by conducting interviews. Interviews will be documented using the company "Witness Statement" form and all interviews will ensure the confidentiality of the workers.
2. Assessing the Scene – Photographs and/or sketches may be taken to provide a visual description of the scene. Any pictures taken as part of the investigation are not to be shared on social media without the written consent of the company.
3. Identification of the Contributing Factors – Investigators will consider the people, equipment, materials, environment as well as policies and procedures which may have contributed to the accident.
4. Investigations Report – A Company Equipment Damage/Loss/Theft Investigation form will be completed on SiteDocs. Reports will be filed with the Health & Safety Department and will be available to workers upon request.
5. Root Causes/Corrective Actions – Will be developed and implemented for the driver/maintenance deficiencies for the sole purpose of ensuring the accident/incident is not repeated. These controls will be reviewed by the JHSC prior to being implemented.

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APPLICABLE FORMS

- Return to Work Early & Re-Employment Policy (HSMS 11-05, HSMS 11-06 and HSMS 11-07)
- First Aid Record (HSF 10.0)
- Functional Abilities Form (Ontario) (WSIB Form 8)
- Incident Reporting Forms (various) are located on SiteDocs. (HSF 10.01, HSF 10.2)
- ESRTW Package (Paper copy in all foremen's trucks)
- Near Miss Report (HSF 10.3)
- MOL Incident Reporting Forms (Provided by the MOL)
- Witness Statement Forms


RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Investigation and Reporting Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Investigation and Reporting Program.
- Provide active support for activities associated with the program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified gaps.

Workers/Subcontractors/Supplied Labour/Visitors on Jobsites will:

- All workers or subcontractors sustaining an injury or occupational illness because of workplace conditions must verbally report their condition to a Manager/Foreman/Superintendent or Supervisor immediately (Refer to WSIB form 82).
- If the worker is unable to report due to the nature of the injury, then another employee who assisted the injured worker must report it immediately.
- The Supervisor/Manager will contain the incident area to prevent further injury or damage and to maintain it for investigation purposes.
- Emergency Response/Ambulance will be contacted, and first aid treatment will take place as required.
- Notify the Health & Safety Department allowing them to notify the union or subcontractor of any injuries or illnesses sustained by any supplied labour during their employment term.

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Foremen/Supervisor/Managers/Superintendents will:

Non-Critical Injury or Illness: (Upon being notified of the injury or illness they shall)

- Immediately ensure first aid is provided from a qualified individual.
- In cooperation with the first aider and injured worker, complete a first aid log sheet noting all details of the illness or injury.
- Determine if subsequent medical aid is necessary. If so, the Supervisor will arrange transportation, as appropriate. Injured/ill workers are not to drive themselves to a hospital or doctor.
- Inform the JHSC and the Health & Safety Department to ensure a proper investigation is completed.
- Ensure that any worker who requires medical attention away from the workplace will receive full pay for the balance of the regularly scheduled shift for the day of injury, including any premium or shift bonuses that would normally be paid.
- Determine if the injury or illness that occurred has the potential to recur and take the appropriate steps to prevent recurrence.
- Once the completed Form 8 has been received, it must be provided to the ESRTW Coordinator to draft the Return to Work to the injured worker.
- Follow up with the injured worker daily to ensure that any restrictions are being followed.
- Provide the complete Accident Investigation Form to the Health & Safety Manager and Senior Project Manager for filling in if using hard copies. Send to safety@kingpaving.com.

Critical Injury or Illness: (Upon being notified of the injury or illness they shall)

- Contain the incident area with caution tape to prevent further injury or damage and to maintain the incident location for investigational purposes.
- No one should disturb the scene, including tools, equipment, etc. for any reason unless a life-threatening situation exists. Take pictures as part of the investigation.
- Emergency response/Ambulance will be contacted, and first aid treatment will take place as appropriate.
- Contact the Health & Safety Department immediately once treatment for the worker has been initiated and it is safe to do so.
- The Health & Safety Department will contact the appropriate of the following: Ministry of Labour (MOL), certified JHSC members, Police, Senior Management, and the worker's family.
- The Health & Safety Department will arrange for support for the workers through counselling or other means.
- The Health & Safety Department will work with the jobsite management, JHSC members and workers to conduct the workplace investigation.
- The Health & Safety Department will provide the MOL with a written report within 48 hours of the incident describing what happened and provide any other requested information required by the MOL.
- Contact the Payroll Department to proceed with the WSIB Form 7 filing.

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First Aid Provider(s) will:

- Provide treatment based on the needs of the injured worker to achieve a full recovery.
- Provide initial treatment based on their level of first aid training.
- Professional medical help will be provided by dialing 911, or if emergency services are not required, arrangements by the onsite Foreman/Superintendent will be made to transport the injured employee to the nearest health care facility.
- Upon being informed of an injured or ill worker, a qualified first aider shall:
 - Attend the injured/ill party and administer proper treatment.
 - Record all first aid treatment or advice.
 - Assist in ensuring that subsequent medical treatment is provided as required.
 - If a worker is refusing medical treatment or transportation, please complete a "Treatment Refusal" Form.

JHSC Certified Members will:

- Assist at the incident scene if available.
- Participate in the incident investigation.
- Provide support to injured workers.
- Review the results of the investigation and make recommendations to management.


Payroll Department will:

- Complete the WSIB Form 7 and submit within 3 days either by hard copy or electronically for the following:
 - Lost time injuries from the day of injury.
 - Medical Aid injuries.
 - Modified duties greater than 7 days.
 - Earns less than regular pay.
- Update the WSIB Case Manager as required until the claim has been closed.
- Provide personal contact information for injured workers as required.
- Maintain all WSIB information in worker's file.

Note: The Health and Safety Department can also complete and submit the WSIB Form 7 and work with the WSIB case manager

Health & Safety Department will:

- Advise and coach on site Management for emergency procedures.
- Contact all the required governing bodies and provide reports as requested.
- Manage all media inquiries.
- Contact Senior Management and other contacts depending on the severity of the incident.
- Ensure onsite investigation is completed immediately.
- Add the injury/illness to the injury statistics for tracking.

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- Ensure first aid statistics are reviewed at least quarterly by the Joint Health and Safety Committee.
- Ensure the WSIB is notified within 72 hours if it is a reportable injury.
- Update the WSIB Case Manager as required until the claim has been closed.
- Provide personal contact information for injured workers as required.
- Notify Senior Management of all injuries/illnesses.
- Manage the RTW claim.
- Perform a post review of the RTW process and make recommendations for continuous improvement.
- For disabling injuries that require medical attention or occupational illness, the Health & Safety Department will deliver within (4 days) to the JHSC committee a written description of the circumstances surrounding the injury/illness.

COMMUNICATION

Communication of this program with regards to the roles and responsibilities will be completed through any of the following forums:

- Scheduled safety meetings
- Safety communication board postings
- Employee orientation
- Subcontractor orientation
- Toolbox talks
- Specific training courses

This policy will be communicated to new employees during the orientation process.

Records of communication will be maintained on SiteDocs.


TRAINING

All workers of King Paving & Construction Ltd. who are required to complete investigation and incident reporting will be trained in how to complete the specific forms required based on the type of workplace incident or accident.

Training records will be maintained by the Health & Safety Department for a period of three years.

Annual training awareness for this program may be completed through any of the different forums:

- Safety day
- New Hire Orientation
- Toolbox talks
- Management Meetings

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- JHSC Meetings
- Specific training courses through external providers such as Basics of Supervision, Safety Representative Training, Hazard Assessment, Analysis and Control and JHSC Certification levels I and II.

Training records will be maintained by the Health & Safety Department in SiteDocs.

Training awareness updates will be completed every three years.

EVALUATION AND CONTINUOUS IMPROVEMENT

This standard and process for the Investigation and Reporting Program will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislation updates will be reviewed to ensure the Investigation and Reporting Program meets the provincial Occupational Health and Safety Act and other governing legislation. If there are legislative or updates in the company policies, the document will be revised and approved.

Evaluation of the Investigation and Reporting Program will be conducted through any of the following:

- monthly management safety meetings
- annually using surveys
- site audits
- safety observations.

A summary review based on the actual results will be prepared for review. The results of the surveys and annual performance results will be reviewed, and recommendations made based on the findings. The amended policy shall be kept as a record of review and the required changes. The revision of the policy shall be tracked on the bottom of the policy and recorded on the document maintenance and tracking log.

An Action Plan is to be created based on the results of the standard evaluation. The Action plan identifies the gap, action to be completed, who will be responsible for completing the action and the timeframe for completion.

Records of the action will be identified on the Continuous Improvement Plan and reviewed by Senior Management on a quarterly basis.

Incident Reporting Procedure	Issue Date: May 29, 2023	
	Revision Date: February 6, 2025	
Policy Number: HSMS 10-03	Revision Number: 003	
	 Approved By: President	

POLICY STATEMENT

This reporting procedure is to establish a consistent means of reporting incidents, accidents, injuries, or occupational illness at King Paving & Construction Ltd. This will ensure incidents, accidents, injuries or occupational illness are reported to not only the Health & Safety Department and senior management but also to the Workplace Safety and Insurance Board (WSIB) and/or The Ministry of Labour, Immigration, Training & Skills Development (MLITSD) when required. This guide works in conjunction with HSMS 10-01 – Investigation and Reporting Policy, HSMS 10-04 - Vehicle Incident Reporting Guide and HSMS 10-05 – Incident Reporting Guide.

REPORTING PROCESS

When an incident, accident, injury, or occupational illness occurs, follow these steps:

1. Verbally notify your supervisor immediately when an incident, accident, injury, or occupational illness occurs so that measures can be taken to ensure employee and/or public safety.
2. A certified first aider should administer any first aid that is required.
3. Once first aid has been administered, a First Aid Treatment Form should be completed on SiteDocs by either the certified first aid provider or the supervisor.
4. The supervisor then must then notify the MLITSD immediately if it is a fatal or critical injury, followed by a written report within 48 hours. Please see HSMS 10-01 for the description of a critical injury.

If it is an accident involving fire or explosion, or an occupational illness, the MLITSD must be notified in writing within 4 days.

5. The Health & Safety Officer must be notified within 4 hours of all incidents. If it is a fatal or critical injury, make contact verbally immediately, as well as with the JHSC & Trade Union.
6. The supervisor is to secure the incident scene, take pictures where possible & do not comment to any media.
7. Once the supervisor has notified the correct parties, any first aid or medical aid has been administered and ensured that the scene is secure, the Incident Report – Injury, Theft, Damage, Utility Hit Form HSF 10.2 must be completed by the supervisor on SiteDocs.
8. The incident, accident, injury, or occupational illness will be followed up by the Health & Safety Department.

Vehicle Accident Reporting Guide	Issue Date: May 29, 2023	
	Revision Date: February 6, 2025	
Policy Number: HSMS 10-04	Revision Number: 002	
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POLICY STATEMENT

This reporting guide is to establish a consistent means of reporting company vehicle accidents at King Paving & Construction Ltd. This will ensure that company vehicle accidents are reported to the Health & Safety Department and senior management.

REPORTING PROCESS

When a company vehicle accident occurs, follow these steps:

1. Stay calm and park as safely as possible.
2. Assess the situation/evaluate your medical condition. Do not move if there is a possible neck or back injury.
3. If you have any warning devices, and can, set them out.
4. Wear hi-vis clothing or use portable lighting, if available, when an accident occurs during low light conditions or poor visibility.
5. Call 911 if you are physically able to. Insist on an incident report, no matter how minor the accident is.
6. Be courteous. Answer any policy questions. Identify yourself and the Company. Supply vehicle information such as CVOR, license & registration if asked. Give identifying information to the other party involved but no comments about assuming responsibility.
7. Obtain a business card and incident reference number from the attending police officer.
8. If you are able, assist injured parties, but do not move the injured unless a life-threatening situation exists.
9. If certified and you are physically able, provide any first aid treatment you can.
10. If you are physically able to do so, protect yourself and the vehicle from further injury or damage. Direct traffic around the accident scene, move vehicle from roadway, when directed, position yourself away from the vehicle, if the vehicle cannot be moved.
11. Verbally report the accident to your immediate supervisor.
12. Do not discuss the accident with other driver(s) or witnesses.
13. Ask all witnesses to give a statement.
14. Manually complete the Vehicle Accident & Loss Report (HSMS 10-02). Provide a copy to the Health & Safety Department.
15. If possible, with the Vehicle Accident & Loss Report, include photographs taken of all four sides of the vehicles involved in the accident. Including road conditions, any skid marks, & the collision scene (i.e., intersection, parking lot etc.). Include pictures of all license plates involved.
16. Return the manually completed report to the Health & Safety Department within 24 hours.

Incident Reporting Guide

Issue Date: February 1, 2024

Revision Date: February 6, 2025

Revision Number: 001

Policy Number: HSMS 10-05

[Signature]
Approved By: President



ALL Incident Reporting

- Supervisor to be notified immediately of the incident & take measures to ensure employee and/or public safety.
- Provide a RTW package to injured employee & instruct the employee to provide the letter to the doctor.
- Secure the incident scene & take pictures. DO NOT comment to the media.
- Supervisor to contact the health & safety officer directly via phone for critical circumstances & email/text for non-critical.
- If there is a critical injury, the supervisor must stop work & contact the MLTSD (MOL) IMMEDIATELY.
- Fully cooperate with the MOL and/or police and if they are on-site, contact the health & safety officer directly for support.
- Supervisor to complete the incident report – Injury, Theft, Damage, Utility Hit form HSF 10.2 on SiteDocs.
- Health & Safety Officer to communicate with regulatory bodies in matters of non-compliance & contact senior management.

Communication

- Health & safety and senior project manager to review form 8 or FAF and prepare the RTW plan with the employee.
- Health & safety to provide agreed upon, signed RTW plan to employee & supervisor.
- Health & safety to complete Form 7 (if required).
- JHSC worker to complete investigation with the assistance of the health & safety department.
- Health & safety to assist supervisor in modified work letter/follow up with employee.
- Health & safety to provide updates to payroll as required.
- Health & safety to work with third party claims management.

Follow up

- Health & safety to track all incident types as per Near Miss, First Aid, Medical and Lost Time.
- Health & safety to provide senior management with incident forms to review & sign off.
- JHSC to review each incident & provide recommendations for safe work procedures to prevent further injuries.
- Operations to review incident trends & make recommendations for improvements.
- Health & safety to provide senior management with a quarterly summary report of all incident types.
- Health & safety to provide training & materials based on incident trends for ongoing prevention.
- Operations to implement & participate in ongoing safety improvement processes.

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POLICY STATEMENT

King Paving & Construction Ltd. is committed to the prevention of injury or occupational illness, limiting suffering and losses by ensuring all employees are equipped with an appropriate immediate response to all identified emergency situations.

The company has identified potential emergency situations applicable to the nature of the work and has identified proper resources needed to react to these situations properly.

The prevention and effective management of emergency situations can assist in minimizing the negative impact of an unexpected event.

SCOPE AND REGULATIONS

This policy pertains to all workers, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.

An Emergency Plan is required for all company workplaces. All managers are required to ensure the Emergency Plan is current and communicated in the daily JHA and relevant to the specific scope of work being performed.

Specific job tasks such as confined space entry require additional emergency procedures to be developed and communicated to the workers involved in the specific work.

DEFINITIONS

For this policy, the following definitions will be used.

Hazard – A source of potential harm to people or a situation with potential to cause injury or loss to the plant, property, and equipment. Hazards can be grouped as physical, chemical, ergonomic, biological, or psychological.

Hazard Control – The process of implementing measures to reduce the risk associated with a hazard.


Hazard Identification – The process of identifying all situations or events that could give rise to injury, illness or damage to a plant or property.

Health – Refers to the physical and psychological health of a worker.

Supervisor – Person who has charge of a workplace or authority over another worker.

Visitor – A person who is not employed by the Company. This person may be a salesperson, trainer, client, or someone who may have interest in the operations.

Worker – Means any of the following, but does not include an inmate of a correctional institution or like institution or facility who participated inside the institution or facility in a work project or rehabilitation program:

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- A person who performs work or supplies services for monetary compensation.
- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school board.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied art and technology, university, or other post-secondary institution.
- A person who receives training from an employer, but who under the "Employment Standard Act, 2000" is not a worker for the purposes for that Act because of the condition set out in subsection 1(2) of that Act have been met.
- Such other person as may be prescribed who perform work or supply services to an employer for no monetary compensation.

Worker Safety Representative – Worker member of the JHSC or a Health & Safety representative as defined in the OHS Act.

PROCEDURE REQUIREMENTS

In keeping with COR Element 11.2, the company has the following requirements:

- The Roles and Responsibilities regarding emergency preparedness are clearly defined in the responsibilities section of this procedure.
- The identification of potential emergency situations is linked to completed hazard assessments, policies, practices, procedures, and emergency response plans. KPC has an in-depth emergency response plan based on hazard assessments that identifies potential emergency situations that may be encountered such as fire, injuries, trench collapse, tornadoes, confined spaces, electrical hazards, etc. There are emergency response plans for the office and for the field crews (HSMS 11-02). In addition, completed hazard assessments for these identified potential emergencies are in the hazard assessment and the risk assessment sections on SiteDocs.
- Documented emergency response plans for various identified potential emergency situations include the roles and responsibilities of relevant employees during emergencies.
- Input to the response plan(s) has been received from relevant interested parties such as workers, foremen, superintendents, JHSC representatives, the health & safety department and from outside sources such as the fire department, Ministry of Labour, Ministry of Environment, Ministry of Transportation, Ontario Road Builders Association, Ontario Sewer and Watermain Construction Association, IHSA, sub-contractors, neighbouring businesses, and clients. Emergency contact phone numbers from clients and other outside sources are also kept at each site in the foremen's trucks and/or in the site trailer.
- Resources needed to implement the emergency response plans have been identified, documented, and are provided by the company to each site. In addition, required resources are listed on each safe work procedure and in each response plan. These resources include items such as fire extinguishers, first aid kits, eye wash bottles, whistles, air horns, etc.
- All emergency equipment that is required will be in place, well-marked and regularly inspected and maintained as per legislative & manufacturer's requirements. The required resources are listed on each


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safe work procedure and on all procedures in our health & safety program, policies, and procedures as well as on the superintendent's pre-job hazard assessment and the foreman's weekly inspection forms located on SiteDocs.

- g) Prevention or minimalization of injury or occupational illness is identified for each emergency and are listed in both the office and field emergency response plans (HSMS 11-02) and in HSMS 11-03 First Aid Policy.
- h) As the per KPC HSMS 11-03 First Aid Policy, the first aid requirements include written procedures for:
 - i. First Aid stations, kits, and supplies
 - ii. The number of first aiders at each site
 - iii. The provision to transport injured workers to a medical facility.
- i) Appropriate emergency communications systems are in place such as air horns, pull stations and cell phones.
- j) Emergency response training is provided for all superintendents, foremen, first aiders, and JHSC members as per the employee's roles. Emergency response training is also provided to all workers via toolbox talks and emergency response drills.
- k) Periodic testing of the emergency response plans and procedures are to take place semi-annually in the form of drills that are based on various scenarios. A record of these drills will be maintained on SiteDocs along with the testing of corrective actions.
- l) Emergency response procedures and response plans will be reviewed at least annually and revised as necessary. All emergency response plans and procedures are reviewed by the health & safety department as part of the annual update that takes place between January and March of each year. The updated or revised plans will also be reviewed by the JHSC and approved by the company president during the first quarter of each year. Emergency response plans (or a portion thereof) are also reviewed with all workers during the emergency drills which are held every June, and a second set of drills that take place no later than September of each year. Preparation information for the various types of emergencies is sent out via company-wide toolbox talks throughout August and September.
- m) Communication of the emergency response plans and procedures and all relevant information will take place for all workers, supervisors, visitors, contractors, emergency response services, governing authorities, and the community regarding emergency response. King Paving & Construction covers emergency response during the orientations and on the annual health & safety day.
- n) Specific forms for documenting and the implementation of emergency response plans such as drills, inspection of equipment and other testing of emergency response are used and maintained on SiteDocs.

GUIDELINES FOR PREPARING AN EMERGENCY PLAN

All projects require an Emergency Plan. The magnitude and complexity of the plan depends on the size of the project/workplace. The plan can also be reviewed by local authorities. King Paving & Construction has devised emergency plans for the field (sites) and for the office separately.

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Required elements are:

- A method for reporting an emergency, generally telephone is the most effective. However, an alternative should exist (perhaps notification with the plant, or police notification from the nearest available phone if the emergency disables the site or office phone lines).
- A list of workers responsible in emergency situations and how to contact them.
 - This should be plainly posted and available.
- A plan for incident investigation and correction of hazard.
- A list of phone numbers for emergency and support services.
 - This listing is in the onsite safety manual as well as posted on the health & safety board (where applicable).
- A method for sounding the alarm:
 - For all jobsites, the air horn is to be used to advise all onsite workers of emergency situations. Everyone is to use three short blasts to acknowledge a stop work situation. All workers are then to gather at the muster point.
- A description of potential emergencies.
 - This is extremely important from an educational standpoint. Emergency preparedness is essentially based on anticipating all possible crises. Everyone should discuss at the daily JHA any potential emergencies that may occur on the jobsite.
- A map of the workplace that shows evacuation routes and head count location, as well as the location of emergency equipment, first aid station, fire sprinklers, alarm pulls, and extinguishers. For field jobsites, the head count and evacuation routes will be discussed at the JHA. Most company owned vehicles are equipped with fire extinguishers and identified with stickers located on the outside of the vehicles. First aid kits are in all Foremen's trucks and identified with stickers on the outside of the vehicle.
- Emergency response kits are provided to all Foremen. These kits should be readily available in the immediate work area in case of emergency.

PROGRAM REQUIREMENTS

Visitor Logs – Visitors and subcontractors are to report to the site superintendent and/or foreman who will add the visitors or subcontractors to their logbooks. Supervisors and emergency response personnel will be notified of these individuals so that they will be included in the head count during emergency evacuation situations. There is a visitor logbook at head office that will be used for visitors to sign in and out. It will be used during emergency evacuation situations.

Short- and Long-Term Mobile Jobsites – All visitors and subcontractors are required to notify site management whenever they are to begin work. Each site location will be required to maintain visitor log records. Visitor logs will be designed as a standard format for King Paving & Construction Ltd. Visitors to construction sites should be included on the Job Hazard Analysis form as attendance records. All visitors need to be made aware of procedures while on company premises.

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Site Fire Plans – All work locations are required to have an emergency plan posted throughout the site in a high traffic area. Temporary work sites are required to have a site-specific plan that all workers including subcontractors are aware of. Emergency plans must include emergency exits, location of first aid kits/fire extinguishers/eye wash stations/pull stations/fire blankets/emergency air horns/muster points and other emergency support tools such as an AED if available. A current copy of the Emergency Preparedness Plan must also be posted on the Health & Safety Board or Safety binders for construction sites.


Training – The risk of an incident cannot be eliminated; therefore, King Paving & Construction Ltd. will take the following steps to help ensure the proper reaction to any emergency that may occur.

- Provide initial emergency first aid training and refresher training ensuring that the appropriate number of first aid trained individuals are always available at each workplace/jobsite (Ontario WSIB Reg. 1101).
- Ensure that first aid trained personnel are known and a list of their names and certificates are posted on the Health & Safety board/Safety binders.
- Provide transportation to a medical facility for injured workers.
- Provide training on fire extinguisher inspections and operations.
- Provide training to management and supervisory personnel on how to handle emergency situations.
- Conduct annual fire drills and post evaluation by the JHSC and Floor Wardens.
- Establish and provide communication in the form of cell phones/radios/air horns or other means. If air horns are to be used as the means of communication to evacuate, the standard will be three short blasts. Other air horn standards may be determined for site specific sites.
- There may be a situation where the general contractor has an established emergency communication procedure for a jobsite. In this case, King Paving & Construction Ltd. would adopt the general contractor's program for the duration of the project.
- Provide appropriate first aid kits and ensure that inspection records are maintained.
- Ensure all emergency equipment is being inspected as per the company inspection policy.
- Training awareness shall be conducted as part of the worker orientation process, with follow-up refresher training conducted every three years or when there are significant changes to the Working at Heights Program or related procedures at King Paving & Construction Ltd.

RESOURCES REQUIRED:

The following resources may be required to implement the emergency response plans:

- Proper size and number of fire extinguishers (Specifics listed under the fire extinguisher section of this policy)
- Adequate number of people trained in the use of fire extinguishers.
- Proper size and number of first aid kits based on the standards set in Regulation 1101 (Specifics listed

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under the first aid section of this policy)

- Adequate number of trained first aiders (certificates posted or in safety binders)
- Emergency Preparedness Guides
- First Aid Reference Guide
- Map to the nearest emergency medical facility
- Eye wash bottles
- Burn kits
- Stretcher as per Regulation 1101
- Air horn
- Phone
- Sanitizer
- CPR mask
- Naloxone kit (in office)
- AED (in office)
- Required documentation such as WSIB postings.
- Specialized equipment such as harnesses, tripods, winches, gas monitors, lifeline depending on the site requirements.
- Proper PPE for the site or location

EQUIPMENT INSPECTION RECORDS

Fire Extinguishers – All fire extinguishers are to be inspected at least monthly by a competent person. All units must be inspected visually to ensure each unit is fully charged, has an authorized inspection tag, and has a safety pin secured by a tear away tie. The person conducting the monthly inspection is required to sign the monthly inspection tag located on the fire extinguisher. For details on inspecting fire extinguishers, refer to SWP Fire Extinguishers - How to Conduct Monthly Inspections.

All fire extinguishers must be either mounted on a wall or other method in vehicles and equipment to prevent accidental discharge. Once the inspection is completed the competent inspector must sign his/her initials in the designated month.

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If the unit has been discharged or if there appears to be damage, it must be reported to the supervisor and taken out of service immediately. The extinguisher will be taken to the construction trailer to be inspected by a third-party provider. Once the unit has passed inspection, it can be returned to normal use.

Requirements:

The following are the requirements from the Ontario Occupational Health and Safety Act, Regulations for Construction Projects O. Reg. 213/91 Sections 52 to 55:

52. (1) Fire extinguishing equipment shall be provided at readily accessible and adequately marked locations at a project. O. Reg. 213/91, s. 52 (1).

(1.1) Every worker who may be required to use fire extinguishing equipment shall be trained in its use. O. Reg. 145/00, s. 16.

(2) Without limiting subsection (1), at least one fire extinguisher shall be provided,

- (a) where flammable liquids or combustible materials are stored, handled or used;
- (b) where oil-fired or gas-fired equipment, other than permanent furnace equipment in a building, is used;
- (c) where welding or open-flame operations are carried on; and
- (d) on each storey of an enclosed building being constructed or altered. O. Reg. 213/91, s. 52 (2).

(3) At least one fire extinguisher shall be provided in a workshop for each 300 or fewer square metres of floor area. O. Reg. 213/91, s. 52 (3).


(4) Clause (2) (d) and subsection (3) do not apply to a building,

- (a) that is to be used as a detached or semi-detached single-family dwelling;
- (b) that has two storeys or less and is to be used as a multiple family dwelling; or
- (c) that has one storey with no basement or cellar. O. Reg. 213/91, s. 52 (4).

53. (1) Fire extinguishing equipment shall be of a suitable type and size to permit the evacuation of workers during a fire. O. Reg. 213/91, s. 53 (1).

(2) Every fire extinguisher,

- (a) shall be a type whose contents are discharged under pressure; and
- (b) shall have an Underwriters' Laboratories of Canada rating of at least 4A40BC. O. Reg. 213/91, s. 53 (2); O. Reg. 345/15, s. 10.

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54. (1) Fire extinguishing equipment shall be protected from physical damage and from freezing.

O. Reg. 213/91, s. 54 (1).

(2) After a fire extinguisher is used, it shall be refilled or replaced immediately. O. Reg. 213/91, s. 54 (2).

55. Every fire extinguisher shall be inspected for defects or deterioration at least once a month by a competent worker who shall record the date of the inspection on a tag attached to it. O. Reg. 213/91, s. 55.

First Aid Kits – First Aid kits must be inspected at least quarterly by a certified First Aid Attendant. All kits should be outfitted with an inspection sticker on the outside of the kit. Once the kit has been inspected and meets Reg. 1101 requirements, a security seal may be placed on the outside of the kit.

The inspector's initials are to be signed on the security seal. The security seal identifies the kit meets the requirements of Reg. 1101.

If the seal is broken, a full inspection of the kit is required. Any missed contents are to be ordered and replaced in the kit. Once the contents have been replaced a new security seal can be installed.


Requirements:

The following are the requirements from WSIA Regulation 1101 (First Aid):

First Aid Requirements

8. (1) Every employer employing not more than five workers in any one shift at a place of employment shall provide and maintain at the place of employment a first aid station with a first aid box containing as a minimum,

- (a) a current edition of a standard St. John Ambulance First Aid Manual;
- (b) 1 card of safety pins; and
- (c) dressings consisting of,
 - (i) 12 adhesive dressings individually wrapped,
 - (ii) 4 sterile gauze pads, 3 inches square,
 - (iii) 2 rolls of gauze bandage, 2 inches wide,
 - (iv) 2 field dressings, 4 inches square or 2 four-inch sterile bandage compresses, and
 - (v) 1 triangular bandage. R.R.O. 1990, Reg. 1101, s. 8 (1).
- (2) The employer shall ensure that the first aid station is always in the charge of a worker who,

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- (a) is the holder of a valid St. John Ambulance Emergency First Aid Certificate or its equivalent; and
- (b) works in the immediate vicinity of the station. R.R.O. 1990, Reg. 1101, s. 8 (2).

9. (1) Every employer employing more than five workers and not more than fifteen workers in any one shift at a place of employment shall provide and maintain a first aid station with a first aid box containing as a minimum,


- (a) a current edition of a standard St. John Ambulance First Aid Manual;
- (b) 1 card of safety pins; and
- (c) dressings consisting of,
 - (i) 24 adhesive dressings individually wrapped,
 - (ii) 12 sterile gauze pads, 3 inches square,
 - (iii) 4 rolls of 2-inch gauze bandage,
 - (iv) 4 rolls of 4-inch gauze bandage,
 - (v) 4 sterile surgical pads suitable for pressure dressings, individually wrapped,
 - (vi) 6 triangular bandages,
 - (vii) 2 rolls of splint padding, and
 - (viii) 1 roll-up splint. R.R.O. 1990, Reg. 1101, s. 9 (1).

(2) The employer shall ensure that the first aid station is always in the charge of a worker who,

- (a) is the holder of a valid St. John Ambulance Standard First Aid Certificate or its equivalent; and
- (b) works in the immediate vicinity of the box. R.R.O. 1990, Reg. 1101, s. 9 (2).

10. (1) Every employer employing more than fifteen and fewer than 200 workers in any one shift at a place of employment shall provide and maintain at the place of employment one stretcher, two blankets and a first aid station with a first aid box containing as a minimum,

- (a) a current edition of a standard St. John Ambulance First Aid Manual;
- (b) 24 safety pins;
- (c) 1 basin, preferably stainless steel; and
- (d) dressings consisting of,
- (e) 48 adhesive dressings, individually wrapped,

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- (ii) 2 rolls of adhesive tape, 1 inch wide,
 - (iii) 12 rolls of 1-inch gauze bandage,
 - (iv) 48 sterile gauze pads, 3 inches square,
 - (v) 8 rolls of 2-inch gauze bandage,
 - (vi) 8 rolls of 4-inch gauze bandage,
 - (vii) 6 sterile surgical pads suitable for pressure dressings, individually wrapped,
 - (viii) 12 triangular bandages,
 - (ix) splints of assorted sizes, and
 - (x) 2 rolls of splint padding. R.R.O. 1990, Reg. 1101, s. 10 (1).
- (2) The employer shall ensure that the first aid station is always in the charge of a worker who,
- (a) is the holder of a valid St. John Ambulance Standard First Aid Certificate or its equivalent; and
 - (b) works in the immediate vicinity of the box. R.R.O. 1990, Reg. 1101, s. 10 (2).

Spill Kits – Spill kits are located on all jobsites where a potential spill could occur. All workers should be trained in how to use the spill kits.

Resources Required:

- CSA approved work boots
- CSA approved eye protection
- CSA approved hard hat
- CSA approved respirator
- CSA approved hi vis vest
- Rubber Gloves
- Tongs and/or shovel
- Spill Kit


1. When a spill occurs the worker(s) must assess the source of the spill.
 - a) If a machine is involved, shut down immediately.
 - b) Determine the type of liquid/fluid. Fuel, oil, anti-freeze etc.
2. If possible, stop the spill at the source and contain the spill using the best method.
 - a) Send worker to get spill-kit out from the site trailer.
 - b) Cover drains and other escape routes if possible.

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- c) Build dyke.
 - d) Channel spills to a contained area or container.
 - e) Place an empty container under the leak.
 - f) Shift or rotate the leaking container to stop the leak.
3. Using absorbent materials (i.e., soaker pads) to soak up the spill or solidify it.
 4. Push absorbent liquid mixture into approved container for proper disposal.
 5. Decontaminate any tools etc. that encountered the spill (clothing, brooms, and shovels).
 6. Report and record the spill.
 7. Contact your immediate supervisor and inform them of the situation. Supervisor will determine if Quantum Emergency Response (environmental spills) is required to handle the spill. Quantum Emergency Response: 1-877-378-7745

RESCUE PLANS

- A written rescue plan is required for any situation where a worker(s) enters a trench, a confined or restricted space or when there is a chance of a fall. The plan needs to include and not be limited to the following components: rescue equipment required, adequate first aiders on site, type of communication to be used, availability of emergency services, location of work being performed, conditions that may interfere with the emergency plan, roles, and responsibilities for everyone involved in the rescue, and other particulars of the rescue plan.
- The rescue plan can be prepared by the onsite Foreman, Supervisor, Superintendent or Manager with the assistance from the JHSC members if available.
- All workers need to be aware of the rescue plan and their role such as rescue of a fellow worker may be required.
- The plan needs to be reviewed prior to entering the trench, confined or restricted space. This plan may need to be altered depending on site conditions if the scope of work changes or for other reasons.
- The King Emergency Response kit must be on site where the work is located for easy access during emergency situations.

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ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Emergency Preparedness Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Emergency Preparedness Program.
- Provide active support for activities associated with the Emergency Preparedness Policy.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure that the Health & Safety Department implements the necessary equipment inspections, purchasing procedures and protocols to support the program.
- Ensure that emergency plans including evacuation maps are posted in areas throughout the main facilities and are accessible to all people that may be affected by an emergency.
- Ensure that fire drills are conducted at least annually in compliance with the fire code (Ontario Fire Code 2.8.3.2).

Foremen/Supervisors/Managers/Superintendents will:

- Complete appropriate training regarding emergency roles and responsibilities for jobsite emergency planning.
- Maintain a valid St. John Ambulance Standard First Aid certificate or an equivalent.
- Establish a muster(s) point for each jobsite as part of the emergency plan. Multiple locations may need to be established depending on the size and/or the location of the jobsite. If there is already an established muster point at the jobsite, then we would adopt the site muster point in our emergency plan.
- Complete fire protection training as assigned.
- Create required emergency plans for the jobsites and review with all workers, visitors, and subcontractors. Rescue plans must include confined space, working at heights and trench rescue plans based on the scope of work being performed.
- Ensure that the proper number, size and types of fire extinguishers and first aid kits are on site and easily accessible.
- Ensure that all workers, visitors, and subcontractors are aware of the locations of onsite first aid kits, fire extinguishers, air horns, spill kits and muster points.
- Coordinate onsite emergency services with the client, general contractor or other designated person or company when required to do so.
- Ensure all workers are provided with the location of the nearest emergency facilities such as hospitals or emergency care locations. Emergency numbers must be available for each job and posted on the Health & Safety board or kept in the Health & Safety binder.

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- Identify hazards related to the specific work zone conditions that could interfere with the site emergency plan.
- Ensure site compliance with all permits including Hot Work, Lock out Tag out, and Confined Space. Permits must be available upon request.
- Consult with the Health & Safety Department as required with regards to developing site specific emergency plans.
- Ensure all workers wear the required personal protective equipment and/or devices.
- Ensure that workers have the machinery, equipment and/or devices needed to carry out the work and are inspected to be in good working condition.
- Ensure there is an appropriate means of communication to notify everyone on the jobsite or locations of emergencies. The means of communication can either be by phone, speaker systems, air horn or other method. The type of communication must be established prior to the start of work on the jobsite.
- Supervise workers to ensure procedures are being followed.
- Verify the emergency action plans are in place during the monthly inspections and informal site visits. Take appropriate action to correct any deficiencies.
- Ensure there is always at least one certified First Aider on all crews/shifts. Each shift/crew must meet the requirements of Reg. 1101.
- Fire drills must be conducted at least annually as per the Fire Code. Participation and attendance must be taken by the designated site coordinator or floor warden(s).
- Post evaluation of the fire drill must be complete along with any recommendations for improvement. The post evaluation will be reviewed by management and the JHSC at least annually.
- Visually display the JHSC/First Aid stickers on their hardhats.

Subcontractors will:

- Ensure that all related requirements under OHSA and O. Reg. 851 RRO. 1990 and O. Reg. 213/91 Construction Projects and O Reg. 297/13 Occupational Health and Safety Awareness Training are met by all workers of subcontractors that work on our King Paving & Construction Ltd. jobsites.
- Follow all site guidelines for Emergency Procedures for all job sites and work locations.
- Ensure that workers who work for any subcontractors have completed the required training including but not limited to MOL Awareness training for workers, fire extinguishers, WHMIS 2015, hazard awareness, PPE requirements and maintenance, inspection procedures and other required training depending on the scope of work.
- Ensure that only competent workers are assigned to the jobsite or work location.
- Provide proof of training for workers assigned to work on the project.

Joint Health & Safety Committee members will:

- Work together with workers and management to identify fall hazards, exercise appropriate due diligence, and prioritize safety concerns daily.
- Participate in the Emergency Preparedness Program training as assigned.

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- Participate in the monthly jobsite inspection program to identify hazards that may interfere with the emergency plan such as blocked exit doors, emergency exit lights not illuminated, etc.
- Participate in Emergency response Drills.
- Correct any non-compliance on jobsites found during the inspection process.
- Review the policy on an annual basis and make recommendations to improve the Emergency Preparedness Program.
- Visually display the JHSC/First Aid Stickers on their hardhats.

Office Floor Warden(s) will:

- Be familiar with the emergency evacuation plan.
- Assist in implementing and improving effective emergency procedures in the workplace or jobsite.
- Help prevent emergencies by monitoring the adequacy of the fire risk control measures.
- Raise awareness with other workers about the fire hazards that exist in your workplace. Report any fire hazards such as blocked exits.
- Instruct workers, visitors, and subcontractors where to go in the event of a workplace emergency.
- Lead the fire drills and real evacuation procedures – they must be familiar with all escape routes and exits from their designated area.
- Ensure all workers, visitors and subcontractors are accounted for during an evacuation.
- If it is safe to do so, assist all people in the workplace should an emergency occur, including assisting people with special needs, such as helping someone in a wheelchair to evacuate. If the fire alarm/or air horn is sounded, floor wardens have a duty to assist in the safe evacuation of workers and visitors from your workplace immediately, and to ensure that their designated area has been cleared.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Maintain a valid St. John Ambulance Standard First Aid certificate or an equivalent (H&S Officer).
- Communicate the requirements of the program and associated procedures to all relevant parties.
- Be responsible for arranging the annual equipment inspections and maintain inspection records for all components of the fall arrest systems as per manufacturer's requirements and OHS regulations.
- Complete formal field audits to ensure compliance with OHS and the Working at Heights requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through any of the following: Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from workers.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.

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- Keep abreast of the updated legislation with regards to Emergency Preparedness standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.

COMMUNICATION

Communication of this program with regards to the roles and responsibilities will be completed through any of the following forums:

- Scheduled safety meetings
- Safety communication board postings
- Worker orientation
- Subcontractor orientation
- Toolbox talks
- Specific training courses

Records of communication will be recorded and stored using SiteDocs or other means when required.

TRAINING/RECORD KEEPING

Training records shall be maintained for workers involved in emergency preparedness. The records will contain the name of the worker trained, date of training and the signature of the person who conducted the training and expiry date. Training records shall be maintained by the Health & Safety Department.


Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual Safety Day
- Specific specialized training such as First Aid

REFERENCES

Occupational Health & Safety Awareness & Training:

<http://www.ontario.ca/laws/regulation/130297>

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Requirements of O. Reg. 851 for Industrial Establishments Section 85:

<http://www.ontario.ca/laws/regulation/900851#BK14>

Requirements of O. Reg. 213/91 for Construction Projects, Section 26, Section 207:

<http://www.ontario.ca/laws/regulation/910213#BK9>

<http://www.ontario.ca/laws/regulation/910213#BK38>

<http://www.ihsa.ca/PDFs/Products/ld/B030.pdf>

WSIB Reg. 1101

HSMS 11-02 Emergency Action Plan Field Guide

HSMS 11-02 Emergency Action Plan Head Office Guide

HSMS 11-03 First Aid Policy

HSMS 11-04 AED Inspection Record

SWP Fire Extinguishers – How to Conduct Monthly Inspections

SWP Fire Prevention and Control

SWP First Aid

CONTINUOUS IMPROVEMENT

This standard and process for the Emergency Preparedness Program will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislation updates will be reviewed to ensure the Emergency Preparedness Program meets the provincial Occupational Health and Safety Act and other governing legislation. If there are legislative or updates in the company policies, the document will be revised and approved.

Evaluation of the Emergency Preparedness Program will be conducted annually using site audits and safety observations. A summary review based on the actual results will be prepared for review. The annual performance results will be reviewed, and recommendations made based on the findings. The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked on the bottom of the policy and recorded on the document maintenance and tracking log. An action plan is to be created based on the results of the standard evaluation. The action plan will identify the gap, action to be completed, who will be responsible to complete the action and the timeframe for completion. Records of the action will be identified on the Continuous Improvement Plan and reviewed by Senior Management on a quarterly basis.

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POLICY STATEMENT

The goal of King Paving & Construction Ltd.'s First Aid Policy is to comply with the Workplace Safety Insurance Act (WSIA). The objective is to ensure that any worker who needs emergency first aid treatment will receive such treatment promptly and efficiently from a certified and qualified person.

The Company is committed to providing training to first aiders and the necessary first aid supplies so that in the event of an injury, workers will be in the best position to preserve life, prevent injuries from getting worse and to promote quick recovery.

SCOPE

This policy applies to all King Paving & Construction Ltd.'s workers and jobsites.

DEFINITIONS

Incident – An incident is an event that results to people and/or damage to the environment, equipment, property and/or material. An incident may require first aid but does not require treatment from a Health Care Provider.

Accident – An accident is an event that results in injury to people that requires medical treatment from a Health Care Provider.

Near Miss – A near miss is an event that under different circumstances could have resulted in physical harm to an individual or damage to the environment, equipment, property and/or material.

Health Care Provider – A Health Care Provider is a person who is licensed to give medical treatment. Examples include but are not limited to physicians, nurses, physiotherapists, dentists, optometrists, and chiropractors.

APPLICABLE FORMS

The forms used in the first aid process are as follows:


- First Aid Record (HSF 10.0)
- Incident Report Form (HSF 10.2)
- Third Party Incident Report Form (HSF 10.2)
- First Aid Kit Inspection completed on the Foreman's Weekly Inspection Form (HSF 9.0)
- Near Miss Report (HSF 10-03)

These forms will be completed using SiteDocs.

PROCEDURES

Incident/Accident/Near Miss Reporting

- Without exception all incidents, accidents and near misses must be reported to the Supervisor.

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- A Supervisor/JHSC member will investigate all accidents, incidents, and near misses.
- Incidents resulting in first aid treatment must be recorded on the First Aid Treatment form.
- All other incidents and near misses may be orally reported to the Supervisor who will complete the electronic form. The worker may be asked to provide a written description when requested.
- All reported accidents and serious incidents will be investigated and may result in workers being asked to provide a more detailed written statement on the occurrence of events leading up to and following the accident (Refer to the King Paving & Construction Ltd. Accident/Incident Investigation Policy).

Postings:

The following items will be posted on the job site Health & Safety Board located in the trailer or the Health & Safety binders for short-term projects.


- Form 82 WSIB Poster
- Valid photocopies of First Aid Certificates
- Workplace Injury Prevention Poster
- Regulation 1101 – First Aid Regulation
- Certified First Aider stickers for hard hats

Resources Required:

- First Aid kits meeting the requirements of WSIA Regulation 1101
- Trained First Aid Personnel
- Eye Wash Bottles
- Stretcher for larger projects as per O. Reg. 1101
- Cell Phone
- Access to SiteDocs first aid and incident report forms and all forms listed in the applicable forms section of this policy.
- Documentation and postings as listed above in the postings section.

First Aid Kits

- First Aid kits will be located within quick and easy access for all workers.
- All First Aid kits on a project will be of the appropriate size and suitability stocked for each location as required in WSIA Regulation 1101.
- First Aid kits are to be identified for new workers during the site orientation process.
- First Aid kits will be inspected and restocked to the original contents at least every three months. Records of the date of inspections and initials of the inspector shall be logged using the inspection log located on each first aid kit.
- A security seal will be applied to the first aid kit to identify compliance of inspection. If the seal has been broken, the kit must be restocked, and a new security seal applied. The certified first aider responsible for the inspection is to initial the security seal.

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- First Aid treatment logs are maintained electronically. When required, the first aider is required to file the report on SiteDocs.
- There will be an Emergency Response Kit issued to all Foremen which will includes a first aid kit.

Treatment Logs

First aid treatment logs are logged electronically using the SiteDocs app.

The first aid attendant or other person rendering first aid using the Treatment Record form will document records of first aid treatment including the following:

- Date and time of injury or report of illness.
- The name of worker treatment has been administered on.
- Name of the first aider.
- Nature of treatment given.
- Location of treatment given.
- Names of those who witnessed the injury or illness occurring.
- Any other information deemed to be significant.

Incident Report

All injuries requiring a minimum of first aid treatment will be recorded on the SiteDocs form within four hours of occurrence.

Injury information will include:


- Date and location of injury.
- Name, address, and contact information for the injured worker.
- Treating Physician, location, and contact information.
- Description of injury and treatment provided.
- Confirmation that the RTW package was provided to the worker.

The injury logs will be reviewed quarterly and annually as part of the continuous improvement program. Results will be provided to Management and the JHSC for review and suggestions for improvement.

Trained First Aiders

The Company will ensure that there are enough workers certified in (at a minimum) Standard First Aid – CPR A - AED procedures available as required.

Training will be provided at the expense of the Company. Workers will be paid their regular wages for attending training.

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Copies of First Aid certificates will be available on each job site.

A trained First Aider will:

- Hold a valid First Aid Certificate (at a minimum, Standard First Aid – CPR A – AED).
- Be identified for new workers.
- Work in close proximity to a First Aid kit/station.
- Keep accurate records.
- Be identified by a First Aid Attendant sticker on their hard hat.

Injuries Requiring Medical Attention


- For injuries or illnesses that are referred to medical attention, a RTW (Return to Work) package for injured workers will be provided.
- King Paving & Construction will ensure that transportation is provided to a medical facility if required.
- RTW package for injured workers contains a letter to the worker and a letter to the treating physician stating modified work is available.
- For injuries or illnesses that are referred to medical attention, the Foreman/Superintendent is required to complete the incident report within four hours of occurrence.
- Contact the Health & Safety Department to coordinate the Investigation Process.
- A Form 8 is required to be completed by the Health Care Provider. The original or copy is to be provided as soon as possible to the Health & Safety Department to prepare the modified job offer.
- The modified job offer will be presented to the injured worker immediately. Acceptance of the offer can be accepted verbally until the form can be signed.
- The injured worker is required to perform only the tasks that will not present any risk of future harm or that are listed on the WSIB Form 8.

General First Aid Procedures

In the event of any injury, the First Aid Procedure is as follows:

The Worker shall:

- Obtain first aid promptly.
- If possible, notify the Supervisor immediately.
- If necessary, be accompanied to the hospital or clinic by a designated individual.
- If medical treatment is required, obtain a company RTW package for injured workers from the Foreman/Superintendent.

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- Ensure the doctor's letter is provided to the first doctor that provides treatment stating the Company has a modified work program available immediately to any injured workers.
- Request that the Form 8 be completed listing any restrictions.
- Provide a copy of the Form 8 to the Foreman/Superintendent to proceed with the creation of the modified job offer.
- Confirm acceptance of the modified job offer.

The First Aider shall:


- Take appropriate action based on the level of training.
- Send someone immediately to notify the onsite Management.
- If external emergency services are required, send someone to direct them to the location of the injured worker(s).
- Continue to administer first aid until relieved by an Emergency Medical Service worker.
- Record the date, time, names of witnesses and the type and location of the injury on the First Aid treatment form located on SiteDocs.

The Superintendent shall:

- Take the necessary steps to ensure the hazard causing the injury is either eliminated or contained.
- Notify Senior Management, Certified JHSC reps and the Health & Safety Department when required.
- Ensure the injured worker is not left unattended.
- Arrange for immediate transportation of the worker to the nearest hospital or medical clinic.
- If possible, accompany the worker to the hospital or clinic, if not possible arrange for someone to accompany the worker. (Note: During the COVID-19 pandemic, it is not possible to have someone accompany the injured worker since hospitals are not allowing it)
- Provide the worker with a company RTW package for injured workers.
- Complete the required Incident Report form located on SiteDocs.
- Secure the scene and take pictures as part of the investigation process.
- Work with the certified JHSC reps and Health & Safety Department to complete the incident investigation process.

RESPONSIBILITIES


Senior Management will:

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- Assume ultimate responsibility for the development and implementation of an effective First Aid Policy.
- Allocate appropriate resources, training, and workers to implement and maintain the First Aid Policy.
- Ensure that all people with responsibilities under this First Aid Policy and Procedure shall be trained with respect to this policy and their obligations.
- Ensure that treatment logs are provided and completed in the event of treatment requiring the use of the contents of the first aid kit.
- Ensure that First Aid Kits and all other required first aid equipment is available to workers on a job site.
- Ensure that First Aiders on a project are available as per the Workplace Safety Insurance Act (WSIA) Regulation 1101.
- Ensure that transportation is provided to workers who are injured on the jobsite and require medical treatment to be administered at a location other than the jobsite.
- When required, ensure appropriate agencies are notified. Refer to MLITSD Critical Injury report requirements.
- In situations where injuries have been sustained due to acts of violence or during the commission of a crime, notify the police (Refer to Workplace Violence and Harassment in the Workplace Policy).
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Deficiencies and take actions to correct identified deficiencies.

Superintendents/Foremen will:

- Ensure there is a designated first aider on every shift. The name of the person is to be identified and recorded on SiteDocs.
- Ensure the sick/injured worker receives first aid immediately upon knowledge of the injury/illness.
- Designate someone to meet Emergency Medical Services (EMS) to give directions to the sick/injured worker.
- If the Superintendent is not on site at the time the incident occurs, the Foreman will arrange for immediate transportation of the worker to the nearest hospital or medical clinic.
- Provide a Return-to-Work Package for injured workers prior to their going to the hospital.
- Complete an incident on SiteDocs within four hours of occurring.
- Notify the Health & Safety Officer within four hours of the event occurring.

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- Secure the scene if required for the investigation. Ensure that no one discusses the details of any incident to any third parties including media.
- Any pictures of the incident scene should be taken by authorized personnel only and used for the purpose of the investigation as required.
- Ensure workers have access to Near Miss forms to identify site hazards. Once the forms have been completed, they need to be forwarded to the Health & Safety Department. Near Miss reports completed with SiteDocs will be automatically filed with the Health & Safety Department for review.
- Ensure that First Aid kits are inspected by only certified First Aiders on a quarterly basis. Any deficiencies are to be corrected immediately.
- Ensure that all First Aid kits are sealed. All kits should have a visible IHSA inspection sticker to record compliance of inspections.

Workers will:


- Report to their immediate Supervisor any accidents/incidents and near misses.
- If required, seek medical attention.
- Cooperate with the Supervisor or Management as required to follow company policies and procedures for First Aid and the Return-to-Work Program.
- Complete all the required paperwork when required.
- Provide a copy of their first aid certification to the Health & Safety Department.
- Be able to provide a copy of the certification when requested.

Joint Health & Safety Committee members will:

- Work together with workers and Management to comply with the First Aid policy on all jobsites.
- Participate in (at a minimum) Standard First Aid – CPR A - AED certification training as assigned.
- Use designated forms to complete the quarterly inspections for first aid kits.
- Review the prior period's accident/incidents. Make recommendations to management to prevent incidents/accidents from occurring in the future.
- Provide a copy of their first aid certification to the Health & Safety Department.
- Be able to provide a copy of the certification when requested.

Subcontractors will:

- Ensure First Aid Kits and all other required first aid equipment is available to all workers on the job site.
- Ensure treatment logs are provided and completed in the event of all treatment requiring the use of the contents of the first aid kit.

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- Ensure that first aiders on a jobsite are available as per Workplace Safety Insurance Act (WSIA) Regulation 1101.
- Report all accidents/incidents to King Paving & Construction Ltd. Management.
- When required, ensure that all appropriate agencies are notified. Refer to legal requirements for reporting accidents outlined in the most current copy of OHSA.
- In situations where injuries have been sustained due to acts of violence or during the commission of a crime. Ensure the police are notified (Refer to the Violence and Harassment in the Workplace Policy).

Health & Safety Department will:


- Review the completed inspection reports and ensure all required inspections are completed.
- Ensure that First Aid training is delivered to workers to meet the requirements of Reg. 1101 and this policy.
- Ensure that workers are certified, at a minimum, to a St. John Ambulance "Standard First Aid – CPR A - AED Certification".
- Ensure the training provider is a registered Ministry of Labour provider for First Aid training.
- Complete audits of this policy on a periodic basis for first aid kits, and completion of required forms.
- Prepare a monthly report for Supervisors for any deficiencies found during inspections.
- Maintain and protect all First Aid records for the required amount of timeframe established by the governing jurisdiction.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to OHSA Standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.

REFERENCE

Occupational Health and Safety Act

The Workplace Safety and Insurance Act (WSIA) Regulation 1101

Regulation for Construction Projects Sections 261, 262, 263

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COMMUNICATION & TRAINING

All workers of King Paving & Construction Ltd. who are designated to provide first aid will be trained to, at a minimum, St. John Ambulance "Standard First Aid – CPR A - AED" or equivalent.

Training records will be maintained by the Health & Safety Department. Training awareness and certification will be completed every three years.

Any subcontractors that perform work for the Company must provide proof of training for their workers during the prequalification process. Subcontractor(s) and their workers are required to comply with the first aid policy.

Communication of the first aid requirements will be completed by means of toolbox talks, safety meetings, JHSC meetings or other means as required by the Health & Safety Department. Records of communication will be maintained in SiteDocs.

EVALUATION

This policy and process for first aid will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislation updates will be reviewed to ensure the first aid policy meets provincial requirements.

The amended policy shall be kept as a record of review and the required changes.

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Policy Number: HSMS 11-05	Revision Number: 008	
 Approved By: President		

POLICY STATEMENT

The purpose of this policy is to ensure effective, proactive, and consistent management of cases relating to a return-to-work initiative from either short- or long-term disability. From both occupational and non-occupational injury/illness, in addition to requests for accommodation and attendance management issues relating to medical reasons.

King Paving & Construction Ltd. is committed to minimizing the negative impacts illness or injury may have on our workers by providing meaningful, productive, and safe return-to-work opportunities for workers with occupational or non-occupational disabilities.

The objectives of this policy are to:

- Promote a culture of injury and illness prevention
- Ensure the optimum conditions for supporting early intervention, expedient return to work and accommodation
- Minimize the costs associated with illness and injuries; and
- Comply with the accommodation requirements of the Ontario Human Rights Code, the Workplace Safety and Insurance Act and the Accessibility for Ontarians with Disabilities Act.


The Return to Work Early (RTW) Program gives structure and organization to these objectives and recognizes the employer's, union(s), and worker(s) joint responsibility to participate in the rehabilitation of the worker. All workplace parties are expected to cooperate and participate in the RTW Program. Early intervention, full participation and partnership of all workplace parties are essential to ensure the success of the Return-to-Work Program with the Company or, if required, labour market.

SCOPE

This policy applies to all workers, both unionized and non-unionized, including Management who are absent from work and/or require temporary or permanent accommodation, because of an injury or illness.

The accommodation needs of workers with disabilities will be considered individually and in a manner that respects the person's dignity, privacy, comfort, autonomy, and self-esteem. Accommodation will be designed to allow the worker to continue to perform their regular occupation, wherever possible.

Alternatively, the Company will strive to identify suitable alternative accommodation options, to the point of undue hardship.

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DEFINITIONS

Accommodation – A change, medication, adaptation, or adjustment to the job duties or the workplace, to enable the worker to perform the essential duties of a job in a healthy and safe manner.

Essential Duties – The duties necessary to achieve the job outcome. The duty is essential if you take the duty away, the job outcome is not accomplished, the product or service is affected or a process before or after is affected.

Comparable Job – A job with the features and earnings comparable to the worker's employment on the date of the injury.

Communication Log – A physical document that will be in each case file. The designated RTW Coordinator will be responsible for recording all conversations pertaining to the case. Information communicated with WSIB, injured worker, treating medical professionals, Supervisor/Managers or other people that may be involved with the case and treatment of the injured worker.

Disability – Covers a broad range and degree of conditions, some visible and some not visible. A disability may have been present from birth, caused by an accident, or developed over time. There are physical, mental, and learning disabilities, mental disorders, hearing or visual disorders, epilepsy, drug and alcohol dependencies, environmental sensitivities, and other conditions.


Functional Abilities Evaluation (FAE) – An objective, third party evaluation of a worker's ability to complete the activities that simulate the physical demands at work, such as lifting, carrying, pushing, pulling, climbing, sitting, walking, reaching, grasping etc. All this information is listed on the Function Ability Form or a WSIB Form 8.

Independent Medical Evaluation (IME) – An objective, third party assessment of a worker's current medical status. If required, an IME is arranged and paid for by the employer to determine the cause, severity, abilities, restrictions, and limitations of the individual.

Long Term Disability – A benefit that provides a partial income replacement when approved and is paid by the Insurer to those workers who have been unable to perform any of the regular duties of their job and continue to be totally disabled at the time of application for LTD benefits.

Job Demands Analysis – An objective observation and evaluation of the physical, sensory, behavioural, and cognitive demands of the job.

Non-Occupational Injury/Illness – A personal injury or illness that occurs outside of the workplace and is unrelated to the course of employment.

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Occupational Injury/Illness – An occupational illness is defined as a condition that results from exposure in a workplace to a physical, chemical or biological agent to the extent that the normal physiological mechanisms are affected, and the health of the worker is impaired.

Permanent Modified Work – Consists of modifying the pre-incident job, relocating the worker to a suitable existing position as soon as it becomes available or modifying the workplace as required. It must be established through a medical program that the worker is permanently disabled and incapable of performing the essential duties of his/her regular position.

Medical Aid – Treatment received from a recognized health care professional that does not result in time away from scheduled work nor a wage loss. Also referred to as Health Care.

Modified Duty – Modification of a worker's regular duties allowing the worker to carry out the work assigned within the worker's capabilities.

Return to Work – Return to work is the process/strategy of safely returning workers to the workplace on a timely basis.

Suitable Work – Work (including the worker's pre-injury/illness job) that is safe, productive, and consistent with the worker's functional abilities, and that, to the extent possible, restores the worker's pre-injury/illness earnings.

Safe – The work must not pose a health or safety risk to the worker (e.g., should not cause re-injury or a new injury), to co-workers or to third parties. The worker has the functional ability to travel safely to and from the proposed new worksite.


Productive – Work that provides an objective benefit to the employer's business, consistent with the worker's functional abilities.

Work Hardening – Provides a transition between acute care and return to work while addressing issues of productivity, safety, physical tolerances, and work behaviours.

Work Transitioning and Relocation – The process of aiding a worker to find suitable employment in cases where their injury or illness prevents them from returning to his/her pre-injury occupation.

Undue Hardship – The limit to which an employer must go to accommodate a worker. Generally, this assessment is made upon consideration of three elements including:

- Cost
- Outside sources of funding, if any; and
- Health & safety requirements.

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Resources Required:

- Return to Work Packages for each foreman and superintendent.
- Access to SiteDocs Incident, first aid and investigation forms.
- Access to the Return-to-Work forms and documentation located on SiteDocs.
- Knowledge and understanding of confidentiality of medical records legislation.
- First Aid Kits and trained First Aid personnel
- Cell phone and emergency contact numbers


RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Early Return to Work and Early Re-employment Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Return to Work and Early Re-employment Program.
- Provide active support for activities associated with the RTW Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Support the development of the RTW Program by ensuring it is fair and consistently applied for all workers.
- Participate in the executive review of the disability management performance and participate in strategy development to achieve Company safety goals.
- Appoint a Return-to-Work Coordinator, who is knowledgeable, experienced and/or trained in RTW/Disability Management, to develop, monitor and administer the Return to Work (RTW) Program.
- Participate in the identification and implementation of meaningful accommodations as required.
- Provide assistance with regard to work transitioning or relocation.
- Follow the recommendations set forth by the W.S.I.B. regarding modified duties, work relocation and transition.
- Ensure that the worker is compensated for all "out of pocket" expenses associated with the injury, illness, and recovery process.
- Provide a safe work environment.

Superintendents/Foremen/Managers will:


- Work with the RTW Coordinator to develop and implement individual RTW plans for an employee who requires modified work.

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- Assist the RTW Coordinator with the list of modified duties available in their work area/department so that the injured worker can perform safely.
- Communicate on a regular basis with all interested parties involved in the RTW plan.
- Maintain confidentiality of all personal information.
- Advise the worker of the availability of accommodation, modified work, work hardening or transitional work and provide the worker with the RTW Package and follow up FAFs as required.
- Contribute to the identification of suitable RTW assignments and accommodations.
- Maintain communication with the worker throughout the RTW process and monitor progress and the effectiveness of accommodations. Record communication in the personal Supervisor Logbook.
- Address RTW concerns and disputes in a timely manner and identify potential solutions.
- Communicate accommodation needs to co-workers and promote a supportive RTW plan/RTWC.
- Participate in RTW meetings and complete progress reports as required by the RTW plan/RTWC.
- Complete RTW program evaluations and identify opportunities for program improvement.

Injured Worker will:

- Contact immediate Supervisor and advise of any injury or illness as per WSIB Form 82.
- Read the RTW policy and instructions for the RTW plan.
- Provide the RTW letter to the medical provider and advise him/her of our modified work program.
- Work with the RTW Coordinator to design a RTW plan that meets the restrictions provided on the initial Form 8.
- Stay in regular communication with the RTW team which includes the immediate Supervisor (i.e., weekly communication).
- Provide WSIB information as requested (Note: A change of doctor(s) cannot be made without permission from WSIB prior).
- Provide an updated FAF every 14 days (2 weeks) if full recovery has not been achieved past the date identified on the original Form 8.
- Provide evidence of treatment attendance such as physiotherapy appointments. Failure to attend scheduled medical treatments will be communicated to WSIB.
- Complete all required paperwork outlined in the RTW plan.
- Immediately report injuries/illnesses and disability leave of absence to the Supervisor.
- Communicate the need for accommodation and provide required forms and information from health care professionals to the Supervisor/RTWC to facilitate accommodation.
- Comply with medical and rehabilitation treatment and arrange appointments during non-work hours wherever possible.

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- Maintain regular contact with the Supervisor/RTWC during periods of absence and while participating in a RTW plan.
- Attend all scheduled RTW meetings.
- Contribute to the development of the RTW plan.
- Communicate any concerns to the Supervisor/RTWC.
- Immediately advise the Supervisor/RTWC of changes in circumstances.
- Work safely.

Co-Workers will:

- Support the RTW plans of workers.
- Contribute to a supportive and respectful work environment.

Healthcare Professionals will:

- Diagnose condition.
- Provide treatment and treatment referrals.
- Assess work capacity and physical and/or cognitive limitations.
- Complete disability and functional ability forms.
- Review job descriptions and make suggestions regarding accommodation.
- Communicate information to the RTWC as needed and with consent.

Union Representatives (where applicable) will:


- Provide visible support for the RTW program.
- Assist with the identification of RTW accommodations.
- Support the worker during the RTW process.
- Ensure worker rights are protected during the RTW process.

Workplace Safety and Insurance Board (WSIB)/Insurers will:

- Adjudicate claims in a timely manner.
- Provide medical, rehabilitation, work reintegration and dispute resolution support to facilitate the return-to-work process.
- Manage claims and pay for expenses and wages based on the approved recommendations from the case manager or adjudicator in accordance with the Workplace Safety and Insurance Act.

RTW/Disability Management Committee (Where required) will:

- Assist in the development of policies and procedures for the RTW program.

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- Monitor the performance of the RTW Program, making recommendations for continuous improvement.
- Note: A RTW/Disability Management Committee will be formed in complicated or extreme long-term cases.

Certified First Aid Providers will:

- Provide first aid treatment to the injured worker as required.
- Complete required incident reporting forms and provide them to the RTW Coordinator or immediate Supervisor.
- Ensure the first aid and/or incident report is uploaded to SiteDocs.


Payroll Department will:

- Process the Form 7 within 72 hours of notification of incident. This duty may also be conducted by the safety department or RTW Coordinator.
- Work with the RTW Coordinator to submit documents to WSIB.
- File all documents pertaining to the injured worker's case in their personnel file.

RTW Coordinator will:

(Program/Case Management Responsibilities)


- Contact the injured worker as soon as possible to initiate the RTW program.
- Review the Form 8 or FAF to help identify suitable temporary work and prepare the RTW plan.
- Work with all interested parties to ensure progress to achieve a return to pre-incident job.
- Maintain the flow of communication and document completion throughout the life cycle of the case file.
- Prepare a disability performance review report at least annually and present it to management. The report will consist of the breakdown of STD, LTD and WSIB claims. Further analysis will be provided to include a summary of the different types of injuries as well as recommendations for prevention of future claims.
- Initiate and maintain contact (through meetings, telephone calls, emails, letters) with workers on disability leaves and return to work plans.
- Maintain records of all communication related to RTW in a contact log.
- Advise workers about benefits, services, and entitlements available under the disability and RTW programs.
- Coordinate treatment referrals, medical, functional, cognitive, and ergonomic assessments that promote successful RTW outcomes.

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- Collect information and suggestions from workers and internal/external resource people to facilitate RTW.
- Identify barriers and implement accommodations, and support services required to facilitate successful RTW Plans.
- Develop RTW plans in collaboration with the worker, supervisor, health care professional and union (where applicable).
- Monitor and adjust RTW plans as required.
- Determine the schedule for monitoring activities/progress reports for each RTW plan.
- Evaluate specific RTW plan outcomes and maintain statistics.


Health & Safety Department will:

- Develop and coordinate the RTW Program.
- Monitor and evaluate the RTW Program and identify opportunities for improvement.
- Maintain disability and RTW Program statistics.
- Ensure workers' rights and confidentiality are respected during the RTW process.
- Act as the disability and claims liaison with the Short-Term Disability (STD) and Long-Term Disability (LTD) insurers, health care professionals and service providers and collect and provide information as required.
- Resolve RTW disputes in a timely manner.
- Initiate and maintain contact (through meetings, telephone calls, emails, letters) with workers on disability leave (STD, LTD) and return to work plans.
- Maintain records of all communications related to RTW in a contact log.
- Advise workers about benefits, services, and entitlements available under the disability and RTW Programs.
- Coordinate treatment referrals, medical, functional, cognitive, and ergonomic assessments that promote successful RTW outcomes.
- Collect information and suggestions from workers and internal/external resource people to facilitate RTW.
- Identify barriers and implement accommodation and support services required to facilitate successful RTW plans.
- Develop RTW plans in collaboration with the worker, supervisor, health care professional, and union (where applicable).
- Aid in developing a work relocation or work transitioning program where required.
- Conduct risk assessments for existing and modified work assignments.

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ROLES, RESPONSIBILITIES & GENERAL PROCEDURES

<u>Procedure</u>	<u>Responsibility</u>
Review the Accident Investigation Form and Form 8 within 24 hours of learning about the injury.	Supervisor
Contact the injured worker the day after the injury. Provide incident report to safety@kingpaving.com within four hours, if possible, of learning of the injury or illness.	Supervisor
Maintain communication on a weekly basis throughout the entire recovery period, document using a RTW Contract Record.	RTW Coordinator
Attempt to find suitable employment for the injured worker.	Supervisor and RTW Coordinator
Maintain any medical information received in a confidential manner.	RTW Coordinator
If appropriate work is available, set up a meeting that includes the worker, and the supervisor.	Supervisor and RTW Coordinator
Complete a RTW Plan form.	RTW Coordinator
Complete Form 7, submit it to WSIB and provide a copy to injured worker.	Payroll
Conduct the meeting and create a suitable plan for modified work.	Supervisor and RTW Coordinator
Monitor & discuss the workers' progress and record of the RTW Program Progress Report. After completion of the first week of the RTW Plan, complete subsequent Progress Reports as the plan changes. Discuss the plan with the worker weekly.	Supervisor
In the case of a dispute, record any comments or problems with the plan on the RTW Dispute Resolution form and adjust the plan accordingly.	Supervisor
Complete the RTW Closure/Evaluation Report.	Supervisor and Worker
Maintain records of all documentation.	RTW Coordinator
Update WSIB on progress and provide supporting documentation as required.	Payroll
Report to WSIB any changes in the workers modified work program.	RTW Coordinator
Maintain copies of all correspondence between all parties in the worker's personnel file.	Payroll

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Reporting Procedures

Occupational Injury/Illness:

- All workers are to report any injury/illness to their supervisor immediately or as soon as is reasonable. Refer to the Injury, illness, and Incident Reporting Procedure.
- If the worker requires health care treatment for a work-related injury/condition, the supervisor will provide the worker with a RTW Package (worker letter and health care professional letter) and instruct the worker to take the letter to their treating health care professional.
- Immediately following initial health care treatment, the worker will provide copies of page 2 of the completed Form 8 or FAF and must contact the RTWC and Supervisor to discuss RTW options.
- If the worker is unable to RTW the same day after receiving their health care treatment due to functional/cognitive limitations or the duration of receiving health care treatment has exceeded the hours of their regular scheduled shift, copies of page 2 of the completed Form 8 or FAF are to be provided the following workday and the supervisor and the RTWC are to be contacted to discuss return to work options.
- Where functional/cognitive abilities information supports an immediate RTW with or without accommodation, workers should be prepared to resume work the same day or at their next scheduled shift.
- If the worker is unable to return to work immediately, the supervisor/RTWC must be notified. The RTWC is to establish initial supportive contact within 24 hours and follow up weekly or as needed depending on the worker's specific situation and medical information throughout the worker's recovery process. Each contact or attempt will be documented on the contact log. Note that the contact frequency may vary depending on the nature and severity of the injury/illness.
- The RTWC/Payroll department will jointly complete the WSIB Form 7; Employer's Report of Injury, within three days of learning of a workplace injury/illness and submit the form to the WSIB.

Non-Occupational Injury/Illness:

- All workers are to report to the supervisor/RTWC any need for workplace accommodation due to illness or disability.
- The supervisor is responsible for notifying the RTWC of absences and RTW issues. The RTWC should be notified immediately in the case of lengthy absences (three days or more).
- The RTWC will contact the worker to request functional ability information from a health care professional and, if required, provide a medical consent form for functional ability information.
- The supervisor should continue to maintain contact with the worker at least bi-weekly. Note: Contact frequency may vary depending on the nature and severity of the injury/illness.

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Return to Work Planning

The Supervisor and the RTWC will arrange a joint meeting with the worker and the union (where applicable) to:

- Confirm the functional abilities to determine whether the worker can return to their regular job.
- Identify and discuss the job duties the worker believes they can perform and any barriers regarding the job duties/tasks they feel unable to complete due to their injury/illness.
- Obtain input from the workplace parties (worker, union, and supervisors) regarding possible accommodation, as necessary.

Determine and Analyze Accommodation Options and Factors

- Type of accommodation – temporary or permanent.
- Health and Safety – Ensure that the accommodation does not place the worker or co-workers at risk.
- Complexity of the accommodation – will a third-party assessment or installation be required? How long will it take to put it in place? Will training for the worker or co-workers be required?
- Suitability – will the accommodation render the work safe, suitable, and sustainable? Are the duties productive, consistent with the worker's functional abilities and does it restore their pre-injury/illness earnings to the greatest extent possible?
- Resources required – have all parties been included and budget requirements been considered and approved? Have all sources of funding been considered up to the point of undue hardship and/or are there alternative means including internal resources that can build/install the accommodation if within their abilities (i.e., Engineering controls, maintenance, etc.)?
- Collaborate throughout the meeting(s) to reach an agreement on the best option or options based on the outcome of the discussion and analysis of removal of barriers or hazards.
- Develop a progressive plan for RTW with input from all parties.
- Note: RTWC will ensure the worker is able to travel safely to the meeting and help in making travel arrangements if needed while ensuring that the meeting location is accessible as per the workers' needs as required.
- If the worker requires accommodation(s) a RTW Plan will be developed and documented on the RTW Plan Form. The plan must be mutually agreed upon and signed by the worker, the supervisor and the RTWC. Where there is disagreement, follow the Dispute Resolution Process.
- If the RTW Plan cannot be developed due to the worker's functional abilities, the RTWC or Supervisor is to monitor the recovery and functional abilities until such time as the worker can safely participate in RTW activities.

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- If the workplace parties are unable to agree on a RTW Plan or arrange a joint meeting to discuss RTW with the worker, the dispute resolutions process outlined below will be followed.
- If a meeting to discuss modified work cannot be scheduled with the worker for any reason, a RTW Plan may be developed by the RTWC and the Supervisor. The RTWC will send a Modified Work Offer Letter and a copy of the proposed RTW Plan to the worker by registered mail. For occupational disabilities, the RTWC will advise the WSIB of the offer, and the worker's response.


The RTW Plan will specify:

- Time frames,
- Functional abilities/limitations,
- Identification and description of suitable tasks in detail,
- Accommodation required,
- Responsibilities, and
- Emergency evacuation requirements (if applicable).
- The Supervisor/RTWC will meet with the worker weekly or by phone to discuss the effectiveness of the plan. All meetings will be documented on the Progress Report form.
- Updated functional abilities information from the health care professional may be requested as required.
- Revisions to the RTW Plan may be made jointly, at any time, as agreed upon by all parties including the supervisor, RTWC and the worker. If the RTW Plan changes, an updated form is required and accepted by the worker.
- The RTW Plan will be considered complete when the worker returns to their pre-injury/illness job (with or without permanent accommodation) or is permanently accommodated in a comparable or alternate position.
- The RTWC will provide a RTW Plan Closure/Evaluation report to the supervisor and the worker within one week of the conclusion of the RTW Plan. The evaluation will be used to help the Company improve future RTW Plans and for continuous improvement of the RTW Program.
- The RTWC will liaise with the WSIB/Insurer and communicate information on the wage changes, changes in duties, duration, and completion of the RTW Plan, failure to cooperate and disputes with the RTW Plan.

Accommodation Options

Based on the functional ability information, accommodation options will be considered following the outlined hierarchy:

- Pre-disability job
- Pre-disability job with accommodations

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- Suitable duties in the workers department
- Suitable duties in other department(s)
- Other available work

Examples of workplace accommodation:


- Modifying the job or job activities to prevent re-injury (e.g., removing or substituting activities that require lifting for a person with a back injury).
- Making ergonomic adjustments.
- Shorter hours or modified hours.
- Assistive devices (e.g., telephone headset).
- Modifying the workplace (e.g., replacing steps with a ramp).
- Modifying equipment (e.g., installing a foot press instead of a lever).
- Temporary assignment to a comparable or alternate position.

Modified Duties

Based on the nature of the injury or illness and the recommendations listed on the functional abilities form, King Paving & Construction will design a modified or restricted work program which will allow the worker to return to gainful employment during his/her recovery process. A meeting will be held with the worker, the RTW Coordinator, a member of the JHSC and the worker's immediate supervisor to discuss the options that are available at the time. The modified duties must not place the worker at risk of aggravating the existing injury or illness.

The following is a list of possible modified duties:

- a. General clean up
- b. Sweeping (when no lifting allowed)
- c. Material handler (when light lifting allowed)
- d. Material receiver
- e. Equipment cleaning
- f. Project/site set-up
- g. Inventory
- h. Design layout (training required)
- i. Secondary supervision/foreman
- j. Safety representative/accident investigator
- k. Project traffic control
- l. Signal person

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Work Transition and Relocation Services

For an Early and Safe Return to Work, the following principles apply:

- A suitable occupation refers to a category of jobs suited to a worker's transferrable skills that are safe, consistent with functional abilities and to the extent possible restores pre-injury earnings.
- The company president will sign the Work Transition Plan on behalf of the company.
- The necessity for a work transition (WT) plan will be determined by the WSIB. The WT plan outlines all the assistance and services that an injured worker requires to enable a return to work with King Paving & Construction in the identified suitable occupation, or if required, to re-enter the labour market. The WSIB will pay any expenses it considers appropriate to enable a worker to engage in a WT plan.
- Relocation is a work reintegration option that may be considered when a suitable occupation is not available with King Paving & Construction. When this is the case, King Paving & Construction will work closely with the worker, WSIB and HRDC to aid in finding the worker suitable employment.
- King Paving & Construction will conduct a work transition assessment in conjunction with the WSIB and the worker after a 6-month period to determine if the RTW and /or WT plan has been successful. Adjustments to the plan(s) will be made based on the results of the assessment.
- The RTW or WT plan will be signed by the president of the company, the worker and the WSIB case manager if applicable.
- Specialized RTW or WT plans will be custom designed for workers who are 55 years of age or older. These plans will be created in conjunction with the WSIB to find suitable and gainful employment or reassignment of duties.
- The work transition plan will include training and education options for the worker based on their skills and potential limitations from their illness or injury.
- Where applicable, English as a second language education may be part of the work transition plan.

Payment of Expenses:

Should a worker become injured or develop an illness as a result of performing their duties, it is the responsibility of King Paving & Construction to ensure that all expenses that have incurred because of the injury, illness or recovery process are paid for by the company and/or the WSIB.

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Any expenses that the employee has paid for such as doctor's notes, tests, transportation, and ambulatory services will be reimbursed within 30 days provided a receipt has been provided to King Paving & Construction.

Dispute Resolution Process

In situations where there are concerns or disputes related to the RTW Plan or process, the workplace parties will use the following procedure.

Disputes may arise from, but are not limited to:

- Suitability of assigned tasks, tools, or equipment.
- Functional and cognitive abilities.
- Lack of progression of recovery, and safety concerns.

The resolution of disputes will be addressed in the following manner: Worker must notify the Supervisor or RTWC of the concern or dispute. The worker is encouraged to identify potential solutions. Concerns/disputes will be documented on a Progress Report Form.


The Supervisor will investigate the concern and discuss possible solutions with the worker. If both parties agree, the solution is implemented and the RTW Plan is updated. A copy of the revised plan is provided to the RTWC. If the concern is not resolved, the supervisor must notify the RTWC. The RTWC investigates the concern and considers possible solutions with the worker, the supervisor, and the union representative (where applicable). If all parties agree, the solution is implemented and the RTW Plan is updated.

The Dispute Resolution Process May Require the RTWC to:

- Seek clarification or input from the worker's health care professional(s).
- Seek clarification or input from the WSIB or STD/LTD Case Manager.
- Refer the worker for an independent medical examination (IME).
- Refer to the worker for a functional abilities evaluation (FAE) or cognitive abilities evaluation.
- Request an ergonomic assessment.
- Request a referral to a WSIB RTW Specialist or Work Transition Specialist to facilitate a resolution (occupational cases only).

If the Worker's Concern or Dispute is not Resolved, the Worker may:

- Pursue an appeal with the WSIB or STD/LTD insurer.
- Initiate a grievance (unionized workers only).

Return to Work Early and Re-employment Policy	Issue Date: January 31, 2016	
	Revision Date: February 7, 2025	
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- Pursue a complaint with the Ontario Human Rights Commission.
- Apply for WSIB/LTD/STD benefits.

EVALUATION OF PROGRAM


Individual Return to Work Evaluations:

- The worker and the supervisor are required to complete and submit the RTW Program Closure/Evaluation report to the RTWC within two weeks of the conclusion of the RTW Plan.
- The RTWC will review the closure/evaluation reports and track the following information:
 - Total lost time days (if applicable)
 - Total accommodated days
 - Total accommodation costs including costs paid by the employer
 - Return to work outcome
 - Regular duties with no accommodation
 - Alternate job with accommodation, or leave of absence
 - Worker suggestions for program improvement
 - Supervisor suggestions for program improvement

APPLICABLE FORMS

WSIB and relevant forms:

- Employer Report of Injury/Disease Form 7
- WSIB Health Professional's Report Form 8
- Employers Subsequent Statement Form 9
- Return to Work Contact Record Form (HSF 8.5)
- Return to Work Plan Form
- Functional Abilities Form
- Return to Work Closure/Evaluation Report
- Return to Work Progress Report
- Return to Work Dispute Resolution Form
- Return to Work Timeline
- Return to Work Letter to Worker
- CAD-7 Report or applicable document
- NEER Statement
- Monthly WSIB Cost Statements
- WSIR Report

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COMMUNICATION

Management and workers will receive communication at least annually about their responsibilities of this standard through any of the following events:

- Scheduled meetings
- Safety communication board postings
- Worker orientation
- Posted signage
- Equipment alerts
- Toolbox talks

A record of communication will be recorded on SiteDocs and maintained by the Health & Safety Department for a period of three years.

TRAINING AND RECORD KEEPING


Medical and health information is to be maintained in a confidential manner. Only information regarding abilities will be distributed to those involved in the program.

Management and workers of King Paving & Construction Ltd. will be trained in the RTW Early and Re-Employment Policy. The records will contain the name of the worker trained, date of training and the signature of the person who conducted the training and expiry date.

The RTW Program training will include:

- Program purpose.
- Benefits of RTW.
- Roles and responsibilities of program participants.
- Procedures for initiating and responding to accommodation requests.
- Procedures for dispute resolution, and confidentiality of program information.
- Workers will be trained on this program during the new hire orientation.
- Supervisors will be trained on this program during orientation (within 7 days of hire or of promotion).
- The annual RTW Program awareness training will be completed by all workplace parties.
- RTW Program updates or changes will be communicated and trained as required.

The RTWC will be required to update training on an ongoing basis to meet any legislative changes or program updates. The RTWC will be required to have training and experience in RTW and case management.

Return to Work Early and Re-employment Policy	Issue Date: January 31, 2016	
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Training awareness updates on this program will be completed through any of the following:

- Annual safety day
- New hire orientation
- Toolbox talks
- Management meetings
- JHSC meetings

The JHSC shall complete awareness training on the RTW Program at least annually.

Records of communication will be recorded on SiteDocs and maintained by the Health & Safety Department for a period of three years.


EVALUATION AND CONTINUOUS IMPROVEMENT

This policy will be evaluated on an on-going basis and reviewed annually by Senior Management, RTWC and the JHSC.

Legislation updates will be reviewed to ensure the Return to Work and Early Re-employment Policy meets WSIB requirements as well as any other governing body. If there are legislative or updates in company policies, the document will be revised and approved.

The RTWC will prepare and present an annual RTW Program evaluation report to Senior Management and the RTW Committee that includes the following information:

- Total number of WSIB, STD and LTD claims.
- Total number of WSIB, STD and LTD lost time days.
- Total number of accommodated days for occupational and non-occupational disabilities.
- Total accommodation costs including benefit costs paid by the employer.
- The total number of RTW plans resulting in the following outcomes:
 - Regular duties with no accommodation.
 - Regular duties with accommodation.
 - Alternate job with no accommodation.
 - Alternate job with accommodation or leave of absence.
- Summary of supervisor suggestions for program improvement.
- Summary of worker suggestions for program improvement.
- Recommendations for program improvement.
- Recommendations for budget allocation.

Return to Work Early and Re-employment Policy	Issue Date: January 31, 2016	
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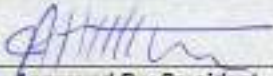
The Senior Management team, in collaboration with the RTWC, will establish a budget for the RTW Program, develop objectives for continuous improvement and implement an action plan that includes:

- Defined objectives,
- Assignment of responsibilities for each objective, and
- Target dates for completion.

Evaluation of the RTW Standard will be conducted annually using any of the following:

- Worker closure forms and annual program review report.
- A summary review based on the actual results will be prepared for review.
- The results of worker feedback and annual performance results will be reviewed, and recommendations made based on the findings.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Policy development	New	Jan 31, 2016	000
Update policy to meet new standards	Annual review	Aug 11, 2017	001
Update policy	Annual review & company name change	Oct 17, 2019	002
Update policy	Annual review	Feb 13, 2020	003
Update policy/Added work transitioning and relocation. Added list of modified duties	Annual review	Feb 01, 2021	004
Update policy	Annual review	Feb 01, 2022	005
Update policy Clarification made regarding changing doctors	Annual review	Jan 12, 2023	006
Update policy Added Required Resources Section	Annual review	Jan 22, 2024	007

Early & Safe Return to Work Policy Statement	Issue Date: February 1, 2021	
	Revision Date: February 7, 2025	
Policy Number: HSMS 11-06	Revision Number: 004	
 Approved By: President		

The management of King Paving & Construction is committed to co-operating with all their employees who have been injured at work and will accommodate injured workers back to suitable employment. The primary goal of the Return to Work (RTW) policy is the timely, safe, and sustainable return to work of all employees. King Paving & Construction will provide modified or transitional work to any of our injured/ill employees until they are able to return to their pre-accident jobs, wherever possible.

King Paving & Construction has implemented a modified duty program. The program will assist in promoting a timely return to work of employees with work related injuries/illnesses. This program will reduce the impact of Workplace Safety and Insurance Costs.

PRINCIPLES OF MODIFIED DUTY


Definition of modified duty: Modified duty is the modification of an employee's position that allows for the employee to carry out the work assigned within the employees' capabilities.

Types of accommodation or modification may include reduction in hours, graduated RTW hours, reassignment of duties, restructuring of job, more frequent rest breaks, general clean up, and safety training etc.

It is the policy of King Paving & Construction to recognize that a temporarily disabled employee can and should be performing meaningful and productive work. The Early and Safe Return to Work Procedure (ESRTW) gives structure and organization to this principle and recognizes the employers, union(s) and employee(s) joint responsibility to participate in the rehabilitation of the employee. When identifying suitable work, consideration will be given to the employee's ability and skills. Every effort will be made to ensure that the work assigned is suited to both the worker's physical and personal abilities and contributes to the productivity of the business.

Specifically:

- The work must be productive, and the result must be valuable.
- The work provided must not aggravate the employees' condition.
- The employee's condition must not constitute an additional hazard to the employee or fellow employee(s) while performing the duties assigned.
- The work must assist the employee in returning to their original position, if possible.
- The duration of the modified duty will be determined at the commencement of the program, wherever possible.
- Prior to starting the modified duty, the employee and employer will sign an agreement with respect to the hours of work, the reporting requirements, and the nature of the modified duty position.
- The Functional Abilities Form (FAF) and the requirements of the employer will be reviewed for the modified duty.
- The employee is required to schedule appointments and therapy at reasonable times, preferably as to not conflict with the employer's time.
- The employee is required to supply medical progress reports every two weeks or as frequently requested by King Paving & Construction.

Early & Safe Return to Work Policy Statement	Issue Date: February 1, 2021	
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Examples of Accommodation:

- Reduced hours
- Graduated RTW hours
- Re-assign duties
- Restructure the job
- More frequent rest breaks
- Work platform vs. ladders
- Mini stretch breaks (10-15 minutes)
- Make heavy tools or objects available at waist height
- Office work

RTW Procedure:


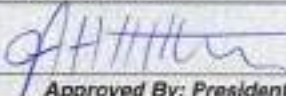
These procedures are to be followed from the time of the reported injury to the worker's return to full employment.

- 1) The worker is to report all work-related injuries and medical complaints ASAP to the Site Supervisor. All critical injuries and fatalities MUST be reported to the Ministry of Labour.
- 2) Site Supervisor / Health & Safety Representative to document any medical concerns and any first-aid treatment in first-aid log. Complete accident investigation report.
- 3) If the worker requires more than first aid, the worker is sent for medical treatment.
 - a. Doctor fills out Form 8 and submits to WSIB
 - b. Doctor fills out FAF. Worker brings it back to the office
- 4) King Paving & Construction office completes Form 7 and submits the form to WSIB within 3 days.
- 5) After a worker receives medical attention, they are to report to the King Paving & Construction office to receive a copy of the Form 7 and instructions on the next steps of the RTW program. If they are unable to come into the office, telephone contact will be established.
- 6) King Paving & Construction stays in regular contact with the employee (telephone or e-mail bi-weekly). Reviewing the doctor's orders, compares the functional abilities with the essential duties of the pre-accident job.
- 7) Modify the pre-accident job's essential duties to the functional abilities if possible.
- 8) If modifying the pre-accident job to the worker's functional abilities is impossible, find other suitable work within the worker's functional abilities. Suitable work must be safe and time limited.

Early & Safe Return to Work Policy Statement	Issue Date: February 1, 2021	
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- 9) Jointly develop a modified duty RTW plan between King Paving & Construction and worker. Establish goals, work hours, location of work, roles, and responsibilities.
- 10) Monitor and evaluate employee's recovery. Establish contact with the employee bi-weekly and document progress of recovery on **Duties and Precautions Form – Return to Work Plan**.
- 11) WSIB sends the completed Return to Work plan to the worker with a copy sent to King Paving & Construction.
- 12) The return-to-work program is completed when the employee can do the pre-accident job. If the employee cannot return to pre-accident duties at the conclusion of the plan, King Paving & Construction shall contact the WSIB claims adjudicator for further assistance.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy		Feb 1, 2021	New
Update Policy	Annual Review	Feb 1, 2022	001
Update Policy	Annual Review	Jan 23, 2023	002
Update Policy	Annual Review	Jan 22, 2024	003
Update Policy	Annual Review	Feb 7, 2025	004

Pandemic Preparedness Policy	Issue Date: July 20, 2020	
	Revision Date: February 7, 2025	
Policy Number: HSMS 11-08	Revision Number: 007	
	 Approved By: President	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, contractors, and visitors.

The purpose of this policy is to introduce protocols to aid in protecting workers, contractors, and visitors from viral and bacterial outbreaks.

SCOPE AND REGULATIONS

This policy pertains to all workers, subcontractors, service providers, and visitors at all work locations of King Paving & Construction Ltd.

DEFINITIONS

Bacteria - a member of a large group of unicellular micro-organisms which have cell walls but lack organelles and an organized nucleus, including some which can cause disease.

Virus - A micro-organism that is smaller than a bacterium that cannot grow or reproduce apart from a living cell. A *virus* invades living cells and uses their chemical machinery to keep itself alive and to replicate itself. *Viruses* may contain either DNA or RNA as their genetic material.

Fungus/Fungi - any of a group of spore-producing organisms feeding on organic matter, including molds, yeast, mushrooms, and toadstools.

Parasite - an organism that lives in or on an organism of another species (its host) and benefits by deriving nutrients at the other's expense.

Infection - The invasion and multiplication of micro-organisms such as bacteria, viruses, and parasites that are not normally present within the body. An **infection** may not cause symptoms and be subclinical, or it may cause symptoms and be clinically apparent.


Outbreak - A disease outbreak is the occurrence of disease cases more than normal expectancy. The number of cases varies according to the disease-causing agent, and the size and type of previous and existing exposure to the agent.

Epidemic - a widespread occurrence of an infectious disease in a community at a particular time.

Pandemic - an epidemic of disease that has spread across a large region; for instance, multiple continents, or even worldwide.

Contagion - the communication of disease from one person to another by close contact.

Sanitize - make clean and hygienic; disinfect.

Pandemic Preparedness Policy	Issue Date: July 20, 2020	
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Sanitizer - Type of antimicrobial that (according to EPA specifications) kills or irreversibly inactivates at least 99.9 percent of all bacteria, fungi, and viruses (called microbes, micro biologicals, micro-organisms) present on a surface. Most sanitizers are based on toxic chemicals such as chlorine, iodine, phenol, or quaternary ammonium compounds, and which (unlike some antiseptics) may never be taken internally.

Route of Entry - How the contagion enters the body. With most bacteria and viruses, the common routes of entry into the body are inhalation, ingestion and entering the body when a person rubs his/her eyes with contaminated hands.


REQUIRED RESOURCES:

- Knowledge of the provincial and federal restrictions
- Proper masks (N95 or better)
- Hand sanitizer
- Disinfecting wipes and sprays
- Specialized test kits when available
- Hand washing facilities
- Knowledge of this policy and adherence to same

ROLES AND RESPONSIBILITIES

Senior Management will:


- Assume ultimate responsibility for the development and implementation of an effective Pandemic Preparedness Policy.
- Be responsible and accountable to protect the health and safety of themselves, all workers, and people in their work environment.
- Allocate appropriate resources, training, PPE, and workers to implement and maintain the Pandemic Preparedness Program.
- Provide active support for activities associated with the Pandemic Preparedness Policy.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure that the Health & Safety Department implements the necessary procedures and protocols to support the Program.
- Ensure that hand washing facilities, hand sanitizer and disinfecting towelettes and/or disinfectant spray are available at all King Paving & Construction locations such as the head office, site trailers and mobile equipment.
- Ensure that face masks are available and worn by all personnel in accordance with municipal, provincial, and federal regulations and bylaws.

<i>Pandemic Preparedness Policy</i>	Issue Date: July 20, 2020	
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	<i>Approved By: President</i>	

- Inform all personnel of the signs and symptoms of Covid-19 and methods to prevent spread of the virus such as wearing masks, proper hand washing, using sanitizers and instructing people to stay home if they are experiencing any possible symptoms of Covid-19.
- Allow employees 14 days for self-isolation if they believe that they have encountered a person who has tested positive for Covid-19 or is experiencing symptoms. NOTE: King Paving & Construction will abide by the most current guidelines regarding isolation. At the time of this policy revision, the isolation periods have changed to 5 days from the onset of symptoms (provided symptoms have subsided) or a positive PCR test for fully vaccinated people and 10 days for unvaccinated or partially vaccinated people.
- Currently, PCR tests are not available to most of the public and rapid antigen tests are difficult to acquire. For this reason, the Company will no longer require proof of negative Covid-19 tests until tests are made available again, or the pandemic has been declared over.
- Prepare and enact a Covid-19 questionnaire for all personnel entering a King Paving & Construction location and denying entry if the person answers negatively to any of the questions and/or is experiencing symptoms of Covid-19.
- Develop a plan for the continuation of work activities if a large percentage of personnel become ill. This includes allowing for recovery time of self-isolation, allowing people to work from home, and limiting contact with other King Paving & Construction employees or the public.
- Establish and enact external and/or customer communications procedures that limit in person interactions.
- Ensure that all personnel such as employees, contractors and visitors follow social (physical) distancing protocols such as maintaining a distance of at least 6 feet or 2 meters.
- Follow provincial guidelines regarding gathering limits.
- Review the effectiveness of this pandemic preparedness quarterly and develop improvements, corrective actions and controls based on the lessons learned throughout the course of the pandemic.

Foremen/Supervisors/Managers/Superintendents will:

- Be responsible and accountable to protect the health and safety of themselves, all workers, and people in their work environment.
- Complete appropriate training regarding procedures and protocols and that they are followed regarding potential illness in the workplace.
- If a person has the potential to spread an illness in the workplace, the supervisor shall plan for the worker to be sent home or to a medical facility.
- Ensure that hand washing facilities, hand sanitizers, disinfecting towelettes and/or disinfectant spray, masks and gloves are readily available and are used as prescribed.
- Ensure that equipment and tools are cleaned and disinfected regularly.
- Limit the sharing of tools and equipment and ensure cleaning and disinfecting between users.
- Ensure that the Covid-19 questionnaire is in place and utilized for all personnel entering a King Paving & Construction site.

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- Inform all personnel of the pandemic preparedness protocols and review regularly during weekly toolbox talks and focus on illness prevention techniques.
- Ensure that all personnel entering a King Paving & Construction site for the first time, all contractors, and all visitors to sites take part in the Company safety orientation and the pandemic preparedness protocols.
- Follow provincial guidelines regarding gathering limits.

Workers will:

- Be responsible and accountable to protect the health and safety of themselves, all workers, and people in their work environment.
- Follow all established protocols during outbreaks of illnesses.
- Report any possible signs or symptoms of Covid-19 to their supervisor.
- Workers are to stay home if they are feeling ill, experiencing possible symptoms or have been in contact with a person who may have Covid-19. If this occurs, the worker is to contact their supervisor by telephone and inform him/her of the situation.
- Maintain a distance of at least 6 feet from others. Where this is not possible, masks must be worn.
- Wear masks in public places and indoors.
- Wash hands frequently using soap and water. Hands must be washed for at least 20 seconds.
- Follow the procedure listed below regarding hand washing, sanitizing, coughing, sneezing, and touching eyes or faces.
- Use hand sanitizer after touching potentially contaminated surfaces.
- Clean and disinfect equipment and tools regularly.
- Avoid sharing tools or equipment where possible.
- If, experiencing symptoms and/or are currently ill, contact their immediate supervisor and leave work to contact their doctor or Tele-Health (1-866-797-000).

PROCEDURES & PROTOCOLS


Many viral and bacterial infections are transmitted from person to person via tiny water droplets that are released when infected people sneeze or cough and by touching contaminated surfaces such as telephones, door handles, light switches, toilets, pens, computer keyboards, tools, equipment etc.

Control Measures

Coughing or Sneezing: Cough or sneeze into your elbow, NOT into your hands. Discard used tissues immediately after use and wash hands with soap and water for at least 20 seconds.

Hand Washing: Studies have shown that washing hands in water alone can prolong the life of the bacteria or virus. Wash your hands thoroughly with soap and water often and for a minimum of 20 seconds. Wash fingertips, between fingers, thumbs and back of hands.

Where hand washing is not available, use hand sanitizer with a minimum of 60% alcohol content.

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Other Bodily Fluids: Depending on the type of illness, persons may become infected through other bodily fluids such as blood, vomit, sweat, tears, mucous and discharges from pustules that are emitted from an infected person. Avoid contact with these fluids and follow universal precautions such as disinfecting with a bleach and water solution, ensuring masks worn by both the infected person and the person responding or involved in clean up and "double gloving".

People: Avoid shaking hands and close contact with people. Wash hands after contact with a person and before and after meals.

Vaccinations: Speak to your doctor or pharmacist about vaccinations for illnesses such as influenza, pneumonia and other vaccinations that may be available that are specific to outbreaks.

Disinfecting Sprays: Lysol or similar alcohol-based sprays may reduce the potential of exposure to contaminated surfaces however, these sprays do not eliminate the potential for exposure or infection.

Disinfecting Wipes: Clorox or similar sanitizing wipes have proven effective at reducing exposure to contaminated surfaces and may be preferable to using sprays on electronic equipment. Specialized anti-bacterial and anti-viral wipes are also available and have proven to be more effective than regular sanitizing wipes.

Masks: Since most masks do not create a seal to the face of the user, masks have proven to be only partially effective unless all personnel are wearing masks where prescribed. Masks work best when potentially infected people are wearing masks as the mask can capture the small water droplets that are projected when a person sneezes or coughs. The effectiveness of masks dramatically improves if all personnel in close contact with each other are wearing masks and when all other pandemic precautions such as physical distancing, frequent hand washing and using sanitizer are being taken.


Replace temporary masks frequently. Clean and disinfect reusable masks daily.

Work: People who are ill with a communicable illness should not go to work until such time as they are no longer considered contagious. When this is the case, KPC requires a minimum of 2 negative tests before allowing the person to physically return to a King Paving & Construction location such as the office or a site.

King Paving & Construction has many duties available if a person is required to work from home. The employee is to contact their supervisor to arrange for suitable assignments.

Physical Distancing: Also referred to as social distancing. Personnel are to maintain a distance of at least 6 feet or 2 metres from each other. When this is not possible, masks are to be worn.

Travel: People who travel or are planning on travelling to "at risk" locations during an epidemic or pandemic are to advise King Paving & Construction Ltd. in advance of such travel plans. King Paving & Construction Ltd. may require a worker who has travelled to an "at risk" location to provide clearance from a qualified medical practitioner prior to returning to work.

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Contact with infected people: Currently, we are experiencing the Coronavirus Covid-19 as a pandemic. King Paving & Construction Ltd. workers who have symptoms of the Coronavirus or have had direct contact with someone who has symptoms of Coronavirus are to advise the Company immediately so that suitable arrangements and precautions can be administered.

Extended Leave or Quarantine: In situations where an infected person has been quarantined or is unable to attend work for extended periods of time (2 weeks or more), King Paving & Construction Ltd. shall coordinate with any worker to determine a suitable solution if extended sick times are required. Such changes will be made on an individual and as-needed basis.

TRAINING

All workers are to be made aware of this policy. Supervisors are encouraged to cover this procedure during a weekly toolbox talk and must post this procedure on the Health & Safety Board or in a Health & Safety binder.

COMMUNICATION

Communication of this policy will be completed through any of the following:

- Scheduled safety meetings
- Safety communication board postings
- Employee orientation
- Toolbox talks

Records of communication will be recorded and stored using SiteDocs.

CONTINUOUS IMPROVEMENT

The Pandemic Preparedness Policy will be reviewed annually jointly by Senior Management and Joint Health and Safety Committee.

Legislative and industry updates will be reviewed to ensure the Pandemic Preparedness Policy meets the Occupational Health and Safety Act, and any other governing legislation that pertains to this program.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Statistics and Records Policy	Issue Date: January 23, 2018	
	Revision Date: February 11, 2025	
Policy Number: HSMS 12-01	Revision Number: 009	
	 Approved By: President	

POLICY STATEMENT

King Paving & Construction Ltd. knows that one of the most important requirements to achieve continual improvement is to regularly monitor and measure health & safety performance. King Paving & Construction Ltd. has a system established to document, maintain and keep records of all health & safety information required by the Health & Safety Management System, internal policies & procedures, and legislation.

The purpose of this policy is to provide an analysis report for monthly, quarterly, and annual statistics and records at King Paving & Construction Ltd. related to the health and safety requirements.

SCOPE AND REGULATION

This policy pertains to all Senior Management, Project Managers, Superintendents, Foremen, Workers, and the Health & Safety Department who are involved in the management of health and safety.

The policy will outline the roles and responsibilities that have been established with regard to the review of trend analysis for the following items:

- Employee Hours Worked
- Accident Reporting
- Return to Work Cases
- Progressive Discipline
- Third Party Claims
- Equipment Theft
- Legislative Inspections

DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the company to whom the subcontractor is providing services to e.g., King Paving & Construction Ltd.


Lagging Indicators – Metrics used to measure past performance.

Leading Indicators – Metrics used to predict future performance.

Metrics - Quantifiable measures used to track and assess the status or performance of a specific business function. Metrics are used to measure progress towards short and long-term goals and objectives.

Lost Time Frequency Rate – $\frac{\# \text{ of Lost-Time Injuries} \times 200,000}{\text{Total Hours Worked}}$

Lost Time Severity Rate – $\frac{\# \text{ of Workdays Lost} \times 200,000}{\text{Total Hours Worked}}$

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Frequency Rate – $\frac{\text{\# of OSHA Recordable Injuries/Illnesses} \times 200,000}{\text{Total Hours Worked}}$

Vehicle Incident Rate – $\frac{\text{\# of Vehicle Accidents}}{\text{\# of Licensed Vehicles}}$

CAD-7 – Is an experience rating program that automatically applies to firms that have total yearly premiums of \$25,000 or more and operate in at least one construction rate group. Please note that the CAD-7 was phased out in 2020 and replaced with a **new experience rating program**.

Qualitative - Properties that are observed and can generally not be measured with a numerical result.

Quantitative - Properties which have numerical characteristics.

Safety Trend Analysis –

- Tracking and monitoring workplace injuries and illnesses on an on-going basis.
- Grouping injuries and illnesses by nature, body part affected, event or exposure, source, etc.
- Determining if any trends in workplace injuries or illnesses exist and graphing those trends if possible.
- Identifying any equipment, materials, or environmental factors that may be commonly involved in workplace injury or illness incidents.
- Identifying possible solutions and suggesting improvements to reduce or prevent the likelihood of future workplace injuries or illnesses.


WSIB – Workplace Safety Insurance Board

WSIR – Workplace Summary Injury Report

REQUIREMENTS

In keeping with COR Element 12.2, King Paving & Construction has the following requirements:


- a) The roles and responsibilities of all parties are clearly listed in the responsibilities section of this procedure.
- b) King Paving & Construction measures occupational health and safety performance on a quarterly basis as well as annually. The results are reviewed by the JHSC and the Senior Management team during the quarterly safety review meetings.
- c) Qualitative and quantitative measurements appropriate to the operating scope of the company are analyzed and communicated with the JHSC and Senior Management team during the quarterly JHSC meetings and the quarterly senior management review meetings. (More information in the qualitative and quantitative measures section in this policy)

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- d) Leading and lagging performance indicators are included in the quarterly and annual health and safety review, and trends are analyzed to ensure that proper preventative and corrective measures are being taken.
- e) KPC includes comparisons of current health and safety performance with past performances. Monthly, quarterly, and annual comparisons are included in the quarterly and annual reviews using tools such as the statistical trend analysis.
- f) KPC analyzes the statistics to identify trends and formulate action plans for improvement via corrective and preventative actions. The safety department maintains a statistical trend analysis chart which is updated monthly. The statistical trend analysis chart is reviewed in all quarterly JHSC and Senior management meetings. The information gained from the trend analysis allows KPC to formulate or update action plans so that preventative and corrective measures can be formulated, enacted, and measured. As an example, if the trend analysis indicated a rise in cuts to hands and fingers, the JHSC might recommend using a different style of glove. If the injuries to hands and fingers decreases, then we know that the switch to a different type of glove was effective.
- g) First aid treatment records are analyzed by the safety department and reviewed with the JHSC and Senior Management team on a quarterly basis. The safety department will review each first aid report and add the information to the statistical trend analysis chart. The type and severity of injury will be analyzed to formulate more effective preventative and corrective measures.
- h) The results of the first aid analysis, incident reports, near misses and statistical trend analysis are communicated to the relevant workplace parties through meetings, toolbox talks, action plans and other reports. King paving & Construction also encourages worker participation by asking for their input during these meetings.
- i) Specific forms and software are used to maintain records. King Paving & Construction utilizes the SiteDocs program for the purpose of submitting and maintain documents and records as per HSMS 1-03 Document and Record Control.

REQUIRED RESOURCES:

- Access to all health and safety department reports such as JHSC meetings, quarterly senior management safety review meetings, action plan updates, etc.
- The action plan for the current year and previous year
- Statistical Trend Analysis documents for the current and previous year
- WSIB reports
- First aid reports
- Near miss reports
- Incident reports
- Investigation reports
- Training reports (matrix)
- Site inspection reports from foremen, superintendents, senior management, JHSC, and the health and safety officer
- Access to superintendent logs

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- MLITSD field visit reports and orders
- MOE reports
- Supporting statistical documentation from the WSIB, IHSA and MLITSD
- Access to SiteDocs
- Access to the WSIB

PROCEDURES

Statistical Data/Review

The Health & Safety Department will be responsible for gathering the information monthly and presenting results quarterly at the Senior Management meeting.

The Superintendents and Project Managers will be responsible for ensuring the data is accurate.


Superintendents will be responsible for communicating the results during a scheduled Toolbox Talk and post in the site trailers and binders.

The quarterly results will be reviewed by the Senior Management team with the Health & Safety Department. An action plan will be developed to ensure the established corporate safety goals are achieved on an ongoing basis.

Quantitative Measurements: Quantitative measurements are numerical in nature thereby allowing for comparisons to past performance. These measurements can be used to determine where improvements have been made and where they may be needed.

The following quantitative categories will be reviewed quarterly by all levels of the Company's management team:

- Fatalities
- Critical Injuries
- Lost Time Injuries
- Days Lost
- Medical Aids
- First Aids
- Near Misses
- MOL Inspections
- MOL Orders
- MOE Inspections
- Superintendent Inspections Completed
- Foremen Inspections Completed
- JHSC Inspections Completed
- H&S Inspections Completed
- Vehicle Accidents

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- Utility Hits
- Property Theft Incidents
- Number of training courses taken

Lagging Indicators include but are not limited to:

- Injury frequency and severity
- Number of fatalities
- Number of Incidents
- Number of Accidents
- Number of lost workdays
- WSIB costs
- Number of utility hits
- Number of theft reports

Leading Indicators include but are not limited to:


- Number of safety meetings
- Number of inspections
- Number of toolbox talks
- Number of training courses taken
- Number of orientations
- Safety audits

These numbers are analyzed aid in determining the effectiveness of our health and safety management system and are compared to the same timeframe of the precious year. For example, if there is an increase in the number of hand injuries, the analysis may point to specific causes, and therefore, targeted controls can be developed and implemented.

Qualitative Measurements: Qualitative measurements are based on observations and input that are not generally measured with a number. Examples of this would be recommendations from workers, observing workers to confirm that safe work practices are being followed, and the quality and timeliness of the work performed.

Qualitative measurements include but are not limited to the following:

- Observation of workers performing duties and comparing it to the safe work procedures
- Observation of vehicle and equipment operators to determine if they are operating safely
- Conducting and observing emergency response drills to determine the effectiveness of the emergency preparedness plan
- Input, suggestions and recommendations from workers from Safety Day, Daily JHA meetings and Weekly Toolbox Talk meetings
- Recommendations from MOL field visit reports

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- Information gathered and discussed at JHSC meetings
- Trials of equipment
- Development of control measures
- Input from senior management
- The effects of weather conditions on safety and production

Man Hours

A headcount and the total number of hours worked will be provided by the payroll department monthly to assist the Health & Safety Department in the statistical calculations.

The information will also be used to upload to the ISNetwork account.

Frequency and Severity Rates

The information will be used to calculate the results, to reflect accountability and review goals for improvement for the Management team.

The Health & Safety Department will provide comparative data from WSIB and MOL as a standard for benchmarking the performance of the Company compared to the industry average.

TRAINING

Training Matrix

A training matrix will be developed to identify and outline the training requirements for all levels of workers within the Company.


The matrix will identify the following components:

- Specific training requirements
- Who is competent to provide training?
- Timeframes
- Method of ensuring transfer of knowledge
- Expiry timeframe
- Verification process

Training Schedule

Each year the Company will identify the minimum training qualifications for the workers. The Company will establish the topics to be covered at the annual Health & Safety Day which is held before the start of the season.

The Health & Safety Department will work in conjunction with the JHSC members and supervisors to identify what training would be beneficial to provide the workers to ensure they can perform their work tasks in a safe and healthy manner.

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Record of Training

- A Record of Training (ROT) provides a systematic approach to ensure that training participants are recognized for attending a particular training session.
- Training records will allow for a quick and general overview of the training status of all workers within the Company. The overview will also allow the Company to ensure they are complying with the Occupational Health and Safety Act and any other provincial regulations.
- The record will include the training topic, date training was delivered, the name of the facilitator, and the printed names of those attending the training.
- The ROT will include a brief description of the course content when training outlines/materials are not provided.
- Records will be filed and stored on SiteDocs by the Health & Safety Department.
- Training records will be updated after the training has been delivered and/or training records have been received by the third-party provider.


PROCEDURES

- The Company will ensure that the annual training requirements are identified and communicated.
- It will be the Health & Safety Department's responsibility to track the training requirements to ensure completion.
- Upon hiring, a worker will be required to participate in, and when required, successfully complete all components of the Company Health & Safety Orientation.
- Through this process, the Company will ensure that the worker has adequate skills and training for the position for which they have been hired.
- If a worker is found to be lacking in the required skills, arrangements will be made by the Health & Safety Department to either provide or arrange to have the necessary training provided.
- The Health & Safety Department will be responsible for ensuring Records of Training (ROT) are recorded and kept on file for a minimum of five years.
- The Company will monitor workplace inspections (*refer to the Workplace Inspection Policy*) to ensure workers are performing their duties in compliance with training standards.
- Supervisors will reinforce training standards through safety talks or by any other means when and where necessary.
- Refresher courses will be delivered as necessary, including but not limited to WHMIS & company orientation at the annual health & safety day.

ENFORCEMENT

Any worker who does not comply with this policy may be subjected to disciplinary actions as per the Company Progressive Discipline Policy.

Supervisors/Foremen may be reassigned if they fail to meet their responsibilities.

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The appropriate consequence will depend on the facts of the case, including the nature of the violation, prior violations, and the seriousness of the violation.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Statistics and Records Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Statistics and Records Program.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure that reviews are completed monthly, quarterly, and annually as stated in the policy.
- Participate in establishing goals and objectives for the reduction of workplace injuries.
- Use the statistical data as part of performance review process for the Superintendents and Foremen.
- Establish the guidelines for which data is to be tracked as part of the analysis process.

Foremen/Supervisors/Managers/Superintendents will:


- Be knowledgeable of the Statistics and Records program and the established safety goals of the Company.
- Complete all incident reporting requirements as per Company guidelines on SiteDocs.
- Contact the Health & Safety Department for directions as required when an incident occurs on the jobsite.
- Provide feedback on site incidents during the monthly Management safety meeting.
- Post the Company monthly trend analysis results on the jobsites.
- Communicate the site safety action plan if required based on the analysis.

Workers will:

- Participate in the monthly review toolbox talk on safety performance and analysis.
- Review the posted monthly trend analysis report as required.
- Report any infractions of the Occupational Health and Safety Act and applicable regulations to your immediate Superintendent/Foreman.

Subcontractors will:

- Be responsible for providing the Company safety data as required to review safety performance.

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Joint Health & Safety Committee members will:

- Work together with workers, the Health & Safety Department and Management to review the Statistics and Records Program annually and make recommendations for continuous improvements.
- Re-enforce compliance of the Statistics and Records Program in the workplace.
- Review the quarterly safety trend analysis report and make recommendations for improvement.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained at the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Health & Safety Day, Toolbox Talks, or onsite training.
- Ensure tracking of the safety data and prepare the monthly, quarterly, and annual reports for review.
- Present the results to all levels of Management and the JHSC.
- Promote feedback and recommendations from workers.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to OSHA standards through industry education.
- Be responsible for updating the Policy on an annual basis with Senior Management and the JHSC.
- Complete the required training to maintain program certification required to instruct training courses.
- Secure the required reports from WSIB that will be included as reference.
- Verify that the information is correct with WSIB with regards to claims and status.

TRAINING/RECORD KEEPING


Training for those individuals responsible for reviewing, analyzing, and preparing the reports will be completed as required. Third party consultants are available through the Safety Group (membership as required).

The Health & Safety Department will retain the trend analysis records for a minimum of three years to provide a baseline comparison for overall safety performance improvement.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings

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- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual Health & Safety Day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

WSIB Experience Rating

WSIB WSIR Report

Trend Analysis Report

ISN Reports


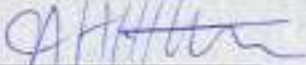
CONTINUOUS IMPROVEMENT

This policy and process for statistics and records program will be reviewed on an annual basis, jointly by Senior Management and JHSC.

Legislative and industry updates will be reviewed to ensure the statistics and records program meets the Occupational Health and Safety Act, WSIB guidelines for injury classification stats, OSHA Incident classification chart and any other governing legislation that pertains to this program.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

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POLICY STATEMENT

King Paving & Construction Ltd. has identified all legislative and other requirements applicable to our scope of work including the Occupational Health and Safety Act, and all other applicable legislation, regulations, standards, and guidelines.

It is the responsibility of King Paving & Construction Ltd. to maintain compliance with all applicable legislative and other requirements, ensuring that all documentation is up to date.

SCOPE AND REGULATION

This policy pertains to all employees, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.

The policy will outline the roles and responsibilities that have been established and will be enforced as part of our due diligence.

DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the company to whom the subcontractor is providing services for (e.g., King Paving & Construction Ltd.)

Compliance – Means the act of being in accordance with established standards, guidelines, or legislation.

Green Book – Occupational Health and Safety Act, O. Reg. 213/91 Regulations for Construction Projects, O. Reg. 851 Regulations for Industrial Establishments

Form 1000 – Registration of Constructors and Employers Engaged in Construction.


Notice of Project – Form 0175 required to be filed with the Ministry of Labour.

Competent Person – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance,
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge of any potential or actual danger to health or safety in the workplace.

Supervisor – Means a person who has charge of a workplace or authority over a worker.

Qualified Person – Is deemed to be qualified due to training and experience with the inspection and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

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Worker – A person who performs work or supplies services for monetary compensation. Other persons who work or provide services to an employer for no money, who may be prescribed by regulation includes an unpaid intern, co-op students, and certain other learners.


RESPONSIBILITIES

King Paving & Construction has the following requirements to meet element 13 of the COR audit:

- a) Roles and responsibilities are clearly listed in this procedure.
- b) Applicable legislation, regulations, standards, and any other requirements such as manufacturers' recommendations have been identified for our scope of work and for all tasks performed. These are listed in the individual procedures in the health and safety program (policies and procedures beginning with the letters HSMS) and in the safe work practices and safe work procedures files (beginning with the letters SWP). When writing, revising, or updating policies and procedures, the health & safety department researches the applicable legislation, guidelines regulations and manufacturer's recommendations to ensure that the correct information is listed on the policy, practice, or procedure.
- c) Methods to ensure compliance with applicable legislation are in place. The health & safety department, along with superintendents, management and JHSC members will ensure that legislation is adhered to through inspections and observations. Refer to the compliance audit section of this procedure.
- d) Ensure all documentation related to legislation, regulations, standards, and any other requirements is up to date.
- e) KPC will ensure that visible posting and/or availability of relevant legislation is readily available at each work site. The office and all site trailers have a safety posting board, plus there is a safety binder in each foreman's truck.
- f) Evaluation of compliance to legislation at regularly planned intervals takes place through safety officer inspections, JHSC inspections, senior management inspections, superintendent, and foreman inspections. Each inspection is retained as per HSMS 1-03 Document and Record Control and is maintained on SiteDocs. If a non-compliance issue arises, corrective actions are to be put in place immediately if possible and listed on the inspection form. If an issue of non-compliance cannot be corrected immediately, the item is to be indicated as an action item on the SiteDocs inspection form and assigned to the department or person that is most capable of correcting the situation in a timely manner. The person or department will be notified via SiteDocs immediately once the action item is assigned and the progress of the corrective action will automatically be tracked. Once the action item has been completed, the inspection form including the action item follow-up will be closed and signed off by the appropriate manager.
- g) Specific forms are required to be used by managers, superintendents, foremen, JHSC members and the health and safety department. These forms are on SiteDocs.

RESOURCES REQUIRED:

- Current copies of the Ontario Occupational Health and Safety Act
- Current copies of O. Reg. 213/91 Regulations for Construction Projects

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- Current Copies of O. Reg. 851 Regulations for Industrial Establishments
- Current copied of Ontario Book 7 Traffic Protection for Temporary Projects
- Access to the Canada Labour Code
- AODA Regulations
- WSIA regulation 1101 First Aid
- O. Reg. 860 WHMIS
- O. Reg. 278 Asbestos and Designated Substances
- O. Reg. 632 Confined Spaces
- Current version of the Ontario Employment Standards Act
- Access to the Workplace Safety Insurance Act
- Access to the Highway Traffic Act


COMPLIANCE AUDIT

As per COR requirements (Element 13.2c), compliance audits will be conducted annually to evaluate our adherence to regulations.

Although adherence to regulations and other requirements is noted during site safety inspections, each year, King Paving & Construction will conduct an in-depth audit on one set of regulations and/standards that apply to our work. For example, in 2025, our compliance audit is for O. Reg. 1101 – First Aid.

The audits will be conducted by the safety officer, and the following process will be followed:

1. The health and safety department will select one set of regulations or standards that will be evaluated.
2. Senior management and the JHSC will be informed of which regulation(s) will be audited.
3. All KPC personnel will be informed of the compliance audit process, and which regulation or standard has been selected during the annual health and safety day. All personnel will also be informed of specifically what the auditor is looking for.
4. A schedule for inspections which include the compliance audit will be created and communicated to all superintendents, foremen, JHSC members, and senior management.
5. The safety officer will conduct the compliance audit as per the schedule.
6. During the inspection and audit, the safety officer will assess whether all facets of the regulation or standard are being met.
7. The safety officer will also conduct impromptu inspections and compliance audits that are not listed on the schedule.
8. The safety officer will inform the superintendent and foremen of the site as to the results of the inspection and compliance audit and will recommend corrective actions where required.
9. The safety officer will complete the H&S Only inspection form on SiteDocs and submit it for review of the company president and the superintendent for the site.
10. In September of each year, the safety officer will generate an evaluation report based on all inspections that included the compliance audit component.

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11. The compliance audit report will be communicated to the JHSC and senior management during the 3rd quarter review meetings.
12. The results of the compliance audit and evaluation will be communicated to all workers via a toolbox talk and/or on the following safety day.


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Legislative Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Legislative Program.
- Purchase the required printed materials needed to support the Legislative program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure the requirements as defined in Section 25 and 26 of OHSWA are completed.
- Complete a review of the safety performance monthly, quarterly, and annually for supervisors and implement an action plan as required.
- Conduct an annual performance for supervisors to review health and safety compliance.

Foremen/Supervisors/Managers/Superintendents will:

- Ensure that workers use the methods, procedures and equipment required by OHSWA and all regulations.
- Ensure that workers use or wear equipment, protective devices, or clothing that is required by the employer.
- Advise workers about actual or potential health and safety concerns.
- Give workers written instructions on the measures and procedures to protect themselves, when required.
- Take every reasonable precaution to protect the workers.
- Supervise workers personally or have an assistant, who is a competent person, do so.
- Inspect the workplace, equipment, and tools weekly.
- Ensure all required postings are available in the construction trailers or Health & Safety binders.
- Maintain a company provided logbook with daily entries as to work activities, performance management or health and safety concerns.
- Complete weekly toolbox talks, and other training material as directed.
- Complete site orientation for workers and subcontractors as required.
- Prepare a site emergency plan. This plan must be communicated to all workers and discussed at the JHA.
- Take progressive disciplinary measures for workers and subcontractors who do not meet legislative standards.

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- Follow the chart for any work refusals. Contact the Health & Safety Department when advised of work refusal.
- Complete the Ministry of Labour Worker and Supervisor Awareness Training within 7 days of assuming the role of supervisor.

Workers will:

- Comply with the health and safety legislation.
- Never use or operate work in a way that could put yourself or other workers in danger.
- Never remove or make ineffective any protective device.
- Select worker representatives for the JHSC.
- Report any violations of the OHSA, any defective equipment, or any workplace hazard to the employer or supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Never engage in horseplay on site (includes but not limited to the following: pranks, competitions, showing off your strength, rough housing or unnecessary running).
- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures.
- Complete the Ministry of Labour Worker Awareness Training within 7 days of starting work as a new hire.

Health & Safety Representatives will:


- Be familiar with the green book, emergency procedures and work refusal procedures.
- Inspect the project at least once a month.
- Makes recommendations or reports on findings about hazards to the employer.
- Get information from the employer about testing equipment or materials for the project.
- Be present during an investigation of a work refusal.
- Be consulted about testing and will be present to ensure test results are valid.
- Inspect the scene of a critical injury or death (when required)
- Report on findings to the Ministry of Labour Director.
- Complete the Ministry of Labour Worker and Supervisor Awareness Training.

Subcontractors will:

- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health and Safety agreement.

Joint Health & Safety Committee members will:

- Identify actual and potential hazards in the workplace.
- Inspect the workplace at least once a month or if that is not practical inspect part of the workplace in accordance with a schedule agreed upon by the committee and employer.
- Make recommendations to the employer about health and safety in the workplace.

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- Participate in the first and second stage investigation of work refusals and inspect workplaces when there are critical injuries or fatalities.
- Ensure that all required documentation, including rules and regulations, are in place and readily available on site.
- Ensure that all regulations, rules, standards, and guidelines are always adhered to.
- Report any issues of non-compliance to the superintendent in charge of the site and to the health & safety department.


Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Conduct specialized compliance audits as per the compliance audit section of this procedure.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to OHS standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Prepare field safety material as required.

RIGHTS OF A WORKER

Workers in Ontario have three basic rights:

- **The right to know** what hazards are in the workplace (The employer has a duty to give that information to the health & safety representative or the JHSC).
- **The right to participate** in keeping the workplace healthy and safe by joining the JHSC or becoming a health & safety representative.
- **The right to refuse unsafe work** that the worker believes endangers their health or safety or the health and safety of others. Refer to the Work Refusal Chart.
 - All workers should be aware of and knowledgeable about the local/onsite procedures for refusing unsafe work.
 - Workers should talk to their supervisors first and try to resolve the problem before initiating the work refusal process.

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TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

All Supervisors and Foremen are required to complete the Basics of Supervision. Newly hired or promoted supervisors must complete the next available course to meet the Company requirements for training.

Senior Management, Supervisors, Foremen, and the Health & Safety Department will participate in training that is required for the Certificate of Recognition (COR) Program in Ontario.

The Joint Health & Safety Committee members must be certified Level 1 and have a minimum of two certified Level 2 worker members. All management representatives must be certified.

A refresher course must be completed every three years to maintain certification.

Training records shall be maintained for employees involved in all aspects of legislative compliance.

The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day


Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

Work Refusal Chart

Occupational Health and Safety Act Construction and Industrial Regulations

First Aid Regulation 1101

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Fire Code

Building Code

Ontario Book 7 (Traffic Control)

WHMIS Regulation

Designated substance regulation

Confined space regulation

Trenching and shoring regulation

HSMS 5-01 Company Rules Policy

General Safety Rules and Regulations

Emergency Response Checklist

Posted Materials Checklist

Progressive Discipline Form

Ministry of Labour Worker and Supervisor Awareness Training

HSMS 1-03 Document and Record Control

Operators Manuals and Other Guidelines

CONTINUOUS IMPROVEMENT

This policy and process for legislative program will be reviewed on an annual basis, jointly by Senior Management and JHSC.

Legislative updates will be reviewed to ensure the legislative maintenance program meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

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POLICY STATEMENT

Information in this procedure is intended to provide an outline of the various duties and responsibilities for all workplace parties. This guideline exceeds the minimum requirements of the current Occupational Health and Safety Act, Part III Duties of Employers and Other Persons, Sections 23 – 32. Should any information in this section conflict with any Federal, Provincial, or local law, the most stringent requirement shall apply.

SCOPE AND REGULATION


The responsibilities reflect the requirements of all workplace parties (Management, Supervisors & Workers) from the Occupational Health and Safety Act (OHS sections 25, 26, 27 & 28).

RESPONSIBILITIES

Employer

The employer shall ensure that:

1. The equipment, materials, and protection devices as prescribed are provided, maintained in good condition, and used as prescribed.
2. The measures and procedures prescribed by legislation and our health & safety program manual are carried out in the workplace.
3. Information, instruction, and supervision are provided to a worker to protect the health and safety of the worker.
4. In a medical emergency, upon request by a medical professional or other such person as prescribed, provide information for diagnosis or treatment.
5. When appointing a supervisor, ensure to appoint a competent person.
6. A worker or a person in authority is acquainted with any hazard in the work and in the handling, storage, use, disposal and transport of any article, device, equipment or a biological, chemical, or physical agent.
7. Assistance and co-operation are provided to a committee and health & safety representative in the carrying out of any of their functions.
8. Only people employed in or around the workplace are over such an age as prescribed. (15)
9. Every precaution reasonable in the circumstances is taken for the protection of a worker.
10. A copy of the Act and any explanatory material prepared by the Ministry of Labour, both in English and the majority language of the workplace, outlining the rights, responsibilities and duties of workers is posted in the workplace.
11. Preparation and review are conducted at least annually of a written occupational health & safety policy and develop and maintain a program to implement that policy.
12. The occupational health & safety policy is posted at a conspicuous location in the workplace.

Duties & Responsibilities	Issue Date: January 22, 2021	
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13. The committee or health & safety representative is informed and provided with the results and reports respecting occupational health & safety in the possession of the employer.
14. A worker is provided with written instructions as to the measures and procedures to be taken for the protection of a worker where so prescribed.
15. Training programs are carried out for workers, supervisors and committee members as may be prescribed.
16. Protection is maximized and inconvenience from our work is minimized for the public and others.
17. New King Paving & Construction workers are to complete the New Worker Orientation form on SiteDocs, and they will receive a copy of King Paving & Construction's Health & Safety Policy, which they are to read and understand.
18. All workers, including contractor and subcontractor workers, are WHMIS trained, and that documentation is retained on file at head office.
19. The current WHMIS and Safety Data Sheets (SDS) are provided to project superintendents and supervisors.
20. Health & safety information is provided to project superintendents and supervisors to facilitate toolbox meetings.

Superintendents

Superintendents are the King Paving & Construction workers in physical charge at the job site. They must accept responsibility for preventing accidents in their jurisdiction. They understand the company's health & safety program and must set an example for all workers under their authority.

Superintendents are responsible to:

1. Conduct hazard analysis and explain the inherent hazards to all project workers.
2. Ensure that the new project workers receive a safety orientation prior to starting work.
3. Investigate all accidents which occur in areas under their control and provide the health & safety department with as much information as possible.
4. Ensure proper use and maintenance of health & safety devices, equipment and personal protective equipment by workers and educate workers on the reasons for using such equipment.
5. Document accidents or near misses in full on SiteDocs and report them to the health & safety department and senior management. In addition, all other workers should be informed of accidents and counselled on ways to prevent recurrence.
6. Enforce health & safety rules and take prompt corrective or disciplinary action for violations.
7. Ensure work is performed only by those who have the proper qualifications.
8. Ensure work is performed with adequate supervision.
9. Ensure that work is assigned to enough qualified workers in order that all tasks can be performed in a safe manner.
10. Monitor work areas and practices for hazards and to take corrective action taken where required.
11. Conduct a monthly safety inspection of their jobsite and complete the appropriate form on SiteDocs.
12. Ensure that toolbox talks are conducted weekly and documented on SiteDocs.

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The Superintendent is responsible for ensuring that the site trailer always contains the following equipment and supplies:


- First aid kit as per WSIB Regulation 1101
- A fire extinguisher - Type ABC – multipurpose – 10lbs minimum
- A copy of the current Occupational Health & Safety Act and Regulations for Construction Projects.
- WHMIS Regulation
 - The hazardous materials SDS used on the jobsite will be available in the SDS book and/or via SiteDocs.
- Current Health & Safety Board which includes but is not limited to:
 - First Aid certificates
 - health & safety policy
 - workplace violence & harassment policy
 - JHSC members & the latest meeting minutes
 - Regulation 1101
 - Employment Standards Poster
 - Accident Prevention Poster
 - Company Rules
 - In Case of Injury Poster
 - Emergency Procedures & Numbers
 - GHS Pictograms

Supervisors/Foremen

Supervisors/Foremen must ensure that:

1. Workers use or wear the equipment, protective devices, or clothing that the employer requires to be or worn.
2. Workers work in the manner and with the protective devices, measures and procedures required by the Act, the Regulations and the company's health & safety program.
3. The new King Paving & Construction workers receive a copy of the health & safety policy, and the orientation form is completed and signed on SiteDocs.
4. Workers are provided with instructions as to the measures and procedures to follow for their protection.
5. A worker is advised of the existence of any potential or actual danger to the health & safety of the worker, of which the supervisor is aware.
6. Where so prescribed *by the Ministry of Labour*, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.
7. They take every precaution reasonable in the circumstances for the protection of a worker.

All accidents are thoroughly investigated and the information including preventative recommendations is recorded on the appropriate form in SiteDocs.

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Worker(s)

A worker shall:

1. Work in compliance with the provisions of the Act, the Regulations and this company's health & safety program manual.
2. Use or wear the equipment, protective devices, or clothing that his/her employer requires be using or wearing.
3. Report to their employer or supervisor the absence of or defect in equipment, or protective device of which the worker is aware, and which may endanger the worker or another worker.
4. Report to their employer or supervisor any contravention of the Act, the Regulations, King Paving & Construction's health & safety program or the existence of any hazard which the worker knows.
5. Report all accidents promptly to management and the immediate supervisor regardless of severity.
6. Help new workers recognize job hazards and follow proper procedures.
7. Familiarize themselves with the location and operation of fire extinguishers and safety equipment.
8. Request information, clarification and/or training necessary to perform assigned tasks in a safe manner.

No worker shall:


9. Use or operate any equipment, machine, device or thing or work in a manner that may endanger himself or any other worker.
10. Remove or make ineffective any protective device required by the regulations or by the employer, without providing an adequate temporary protective device and when the need for removing or making ineffective the protective device has ceased, the protective device shall be replaced immediately.
11. Engage in any prank, contest, feat of strength, unnecessary running, or rough and boisterous conduct.
12. Bring or be under the influence of alcohol, narcotics, or drug-related substances while at work.
13. Endanger the health, safety, or welfare of others.

SUBCONTRACTORS

The use of subcontractors on a construction project introduces the possibility of different safety standards and quality of performance. This is due to the number of companies, the health & safety attitude of the companies and their workers and the specialized work. To overcome this problem, King Paving & Construction has included in its Subcontractor Health & Safety Agreement that all subcontractors commit to complying with all federal, provincial legislation and the King Paving & Construction health & safety program.

Prior to commencing their work on our project, all subcontractors shall submit to King Paving & Construction's head office:

- an up-to-date WSIB Clearance Certificate
- Ministry of Labour Form 1000
- an up-to-date Certificate of Insurance with the Company listed as Certificate Holder & Additional Insured with at least \$2M CGL and Automobile Liability insurance annually.

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- a copy of training records based on scope of work to be performed (minimum required: Workplace Violence & Harassment, Working at Heights, MOL Worker Health & Safety Awareness or Supervisor Health & Safety Awareness, WHMIS, AODA)
- a signed copy of the Subcontractor Health & Safety Agreement
- an inventory of all WHMIS controlled products that will be on site along with the safety data sheets.

All subcontracting site workers are required to attend a subcontractor safety orientation prior to starting their work on site. All workers are required to sign the Subcontractor Orientation form on SiteDocs to document this training.

All subcontractors under the Occupational Health & Safety Act, Section 25 & 26, are to fulfill the duties and responsibilities of the employer designation for their own workers while on our site.

Accidents that occur to the workers of our subcontractors who are working on our sites **must be reported immediately to our superintendent**. Subcontractor supervisory personnel are required to thoroughly investigate all accidents involving their workers, equipment, or materials. Documentation of the accident investigation shall be submitted on the same day as the occurrence to the King Paving & Construction Superintendent and retained on file at the site.

Failure to comply with all Occupational Health and Safety Act and Regulations, King Paving & Construction's Health & Safety Program and site-specific safety rules and procedures could be cause for contract termination or worker loss of site privileges.

Health & Safety Representatives have a responsibility to:


1. Identify situations which may be dangerous.
2. Investigate and help deal with work refusals.
3. Assist in accident investigations.
4. Make health & safety recommendations to management.

Joint Health & Safety Committee has a responsibility to:

1. Inspect the workplace at least once per month.
2. Identify situations which may be dangerous.
3. Investigate work refusals and reports of dangerous conditions.
4. Assist in accident investigations.
5. Create health and safety reports.
6. Make health & safety recommendations to management.
7. Initiate bilateral work stoppage or unilateral work stoppage where special permission has been granted by the Ministry of Labour (Certified members only).

TRAINING

- Superintendents and Foremen will receive at minimum, formal training for their legislated health and safety roles and responsibilities.
- All new workers will receive orientation upon hire which will include their roles and responsibilities.

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- JHSC members will receive Certification training.
- Subcontractors will show proof of training for at least one Supervisor who will be on the sites.

A review of Roles and Responsibilities for all workplace parties may be done at the King Paving & Construction Health & Safety Day or as changes occur.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Toolbox talks
- Company emails
- Annual safety day

REFERENCES

- Ontario legislation – Occupational Health & Safety Act sections 25, 26, 27 & 28
- HSMS 13-01 Legislation


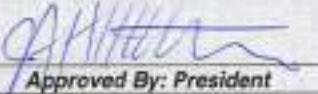
EVALUATION

This policy for Duties & Responsibilities will be reviewed annually and jointly by Senior Management and JHSC.

Legislative updates will be reviewed to ensure the policy meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Accessibility for Ontarians with Disabilities Policy	Issue Date: June 15, 2021	
	Revision Date: February 11, 2025	
Policy Number: HSMS 13-03	Revision Number: 004	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

SCOPE AND REGULATION

This policy pertains to all employees, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.

King Paving & Construction Ltd is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

King Paving & Construction Ltd. understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute for or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

King Paving & Construction Ltd. is committed to excellence in providing goods, services or facilities to all customers, including people with disabilities.


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Accessibility Policy and Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Accessibility Policy and Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct the identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Receive AODA training and follow the guidelines within the policy.
- Ensure that people with disabilities that enter a King Paving & Construction site, facility or property have received the safety orientation and are fully trained in the duties that they are to perform.
- Supervise and monitor the activities of the person with a disability, their co-workers, and the surrounding area.

Accessibility for Ontarians with Disabilities Policy	Issue Date: June 15, 2021	
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- Afford assistance if required as per the AODA regulations and the King Paving & Construction policies and procedures.
- Have follow-up discussions with the person to ensure he/she can perform their duties, while maintaining a high level of safety for themselves and those around them.
- Not allow any form of discrimination and take immediate action should such a situation arise.

Workers will:

- Receive AODA training and follow the guidelines within the policy.
- Afford assistance if required as per the AODA regulations and the King Paving & Construction policies and procedures.
- Be aware of any limitations that may exist and offer aid where required.

Health & Safety Department will:


- Keep current regarding changes or updates to the AODA regulations and update the related policies and procedures to reflect these changes.
- Review the AODA policy annually and ensure that senior management has reviewed and approved the policy.
- Ensure that all people with disabilities have received safety orientation training and all other safety training that is relevant to their position.
- Follow up with the person to ensure that the duties that have been assigned are within their scope of work.
- Ensure that any special accommodation that may be required is discussed with senior management, approved, and implemented.
- Work with the Payroll Department and the WSIB should an injury or occupational illness occur.

Payroll Department will:

- Ensure that all AODA regulations are upheld.
- Afford assistance where required.
- Work with the Health & Safety Department to ensure that people with a disability are treated with respect, dignity, and integrity.
- Work with the Health & Safety Department and the WSIB should an injury or occupational illness occur.

TRAINING/RECORD KEEPING

We are committed to training all workers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

Accessibility for Ontarians with Disabilities Policy	Issue Date: June 15, 2021	
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In addition, we will train:

- All workers who participate in developing the company's policies
- All other workers who provide goods, services, or facilities on behalf of the company

Training our workers in accessibility relates to their specific roles and includes:

- Purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- Our policies related to the Customer Service Standards
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require assistance of a service animal or a support person
- How to use the equipment or devices available on-site or otherwise that may help with providing goods, services, or facilities to people with disabilities.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor Orientation
- Toolbox talks
- Company emails
- Annual safety day

EVALUATION

This Accessibility Policy will be reviewed annually and jointly by Senior Management and JHSC.

Legislative updates will be reviewed to ensure the policy meets the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) as well as the Ontario Human Rights Code, or any other governing legislation.

**Accessibility for
Ontarians with
Disabilities Plan**

Issue Date: June 25, 2021

Revision Date: February 11, 2025

Revision Number: 004

Policy Number: HSMS 13-04



Approved By: President


POLICY STATEMENT

To ensure full compliance with the Accessibility for Ontarians with Disabilities Act.

SCOPE AND REGULATION

Applies to all King Paving & Construction Ltd. properties and hiring practices.

DEFINITIONS

Disability: A disability may have been present at birth, caused by an accident, or developed over time.

Section 10 of the Human Rights *Code* defines "disability" as:

1. any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
2. a condition of mental impairment or a developmental disability,
3. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
4. a mental disorder, or
5. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

ROLES AND RESPONSIBILITIES
Senior Management will:


- Ensure full compliance with the Accessibility for Ontarians with Disabilities Act and to have measures and procedures in place to cater to the special needs of a person with a disability.

Foremen/Supervisors/Managers/Superintendents will:

- Provide support for the special needs of a person with a disability as per this procedure.

Workers will:

- Provide support the special needs of a person with a disability as per this procedure.


Accessibility for Ontarians with Disabilities Plan	Issue Date: June 25, 2021	
	Revision Date: February 11, 2025	
Policy Number: HSMS 13-04	Revision Number: 004	
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STANDARD/PROCEDURE

In fulfilling our mission, King Paving & Construction always strives to provide its goods and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allow them to benefit from the same services, in the same place and in a similar way as other customers.

King Paving & Construction is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:

- a) **Communication:** We will communicate with people with disabilities in ways that recognize and respect their disability. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities. We are committed to providing fully accessible telephone service to our customers. We will train staff to communicate with customers over the telephone in clear plain language and to speak clearly and slowly. We will offer to communicate with customers by email or fax if telephone communication is not suitable to their communication needs or is not available. We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure that our staff is trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services. We are committed to providing accessible invoices to our customers. For this reason, invoices will be provided in the following formats upon request: hard copy, large print, email, or fax. We will answer any questions customers may have about the content of an invoice in person, by telephone, or email.
- b) **Use of Service Animals and Support Persons:** We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all staff are properly trained in how to interact with people with disabilities who are accompanied by a service animal. We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter King Paving & Construction's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises. King Paving & Construction will make every effort to accommodate support animals on sites, however some sites it may not be possible/feasible due to the hazards present.
- c) **Persons with disabilities, whether they be a visitor or employee will be informed of the King Paving & Construction emergency response procedures.** King Paving & Construction will assign a representative to aid during emergency situations.
- d) **King Paving & Construction has a duty to accommodate persons with disabilities.** If special accommodation is required, the Health & Safety Officer will make arrangements in cooperation with the person to determine their unique requirements and ensure that the identified requirements are in place

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prior to the person's entry to the King Paving & Construction office or site. The requirements may include but are not limited to wheelchair accessible desks, adjustable chairs, larger computer screens and text readers.

- e) The company website will endeavour to conform to level Double-A of the World Wide Web Consortium (WC3) Web Content Accessibility Guidelines 2.0 and to be accessible within any browser. Our website will be developed and updated using standards-compliant HTML and CSS.
- f) Notice of temporary disruption: King Paving & Construction will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances and service counters on our premises. Should the disruption involve access into the building located at 3385 Harvester Road in Burlington, the building management company AB&I Holdings is responsible for posting notifications at the entrances of the building and notifying the tenants.
- g) Training for Staff: King Paving & Construction will provide training to all employees who are involved in the development and approvals of customer service policies, practices, and procedures. Individuals in the following positions will be trained:


Project Managers, Project Co-ordinators, Site Superintendents, Receptionist and Accountant.

The training will be provided immediately after staff commence their duties. Training will include the following:

- i) The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- ii) How to interact and communicate with people with various types of disabilities
- iii) How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or support person
- iv) What to do if a person with a disability is having difficulty in accessing King Paving & Construction's goods and services
- v) King Paving & Construction's policies, practices and procedures relating to the customer service standard

Applicable staff will be trained on policies, practices and procedures that affect the way goods and services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices, and procedures.

- h) Feedback process: The goal of King Paving & Construction is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well

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those expectations are being met are welcome and appreciated. Feedback regarding the way King Paving & Construction provides goods and services to people with disabilities can be made by email or letter. All feedback will be directed to the Health & Safety Officer. Customers can expect to hear back within ten business days.

APPENDIX A:

DOCUMENTATION

Entry of Service Animals and Support Persons to King Paving & Construction Office Premises: King Paving & Construction does not bar access of service animals or support persons to its premises. Note: King Paving & Construction requires that all service animals attending at its premises be properly leashed and that at no time does any employee or visitor touch or interfere in any manner with a service dog. A water dish will be provided for the use of all service dogs attending King Paving & Construction premises.

Entry of Service Animals to King Paving & Construction Sites: Due to the hazards at construction, service animals are not allowed to enter any King Paving & Construction sites.

Building Access: King Paving & Construction's head office is at 3385 Harvester Road in Burlington. Due to the age of the building, accessible door operators are not currently installed on the building entrance and exit doors. The building's washrooms do not have automatic operators installed on the entrance doors; however, the stalls are wheelchair accessible.

One accessible parking space is located at the main building entrance.

Access is limited to the first floor of the building as elevators have not been installed.

Should a person with a disability require entrance to the King Paving & Construction Head Office, arrangements will be made to have an AODA trained representative available to aid in accessing the building.

King Paving & Construction's office operating hours are 8:30 a.m. to 4:30 p.m., Monday to Friday.


Support persons and all other visitors to King Paving & Construction's job site premises are to be wearing proper safety devices/equipment as required by the Ontario Occupational Health and Safety Act and/or as required by the King Paving & Construction site superintendent in charge.

COMMUNICATION

Persons with disabilities that require aid, or special needs are to notify King Paving & Construction prior to arrival to the office or site to allow King Paving & Construction personnel to accommodate their needs.

TRAINING

All King Paving and Construction personnel are required to receive AODA training.

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EVALUATION/REVIEW

This procedure will be review annually by King Paving & Construction senior management and the JHSC.

ASSOCIATED DOCUMENTS/FORMS

- Accessibility for Ontarians with Disabilities Act
- HSMS 13-03 Accessibility for Ontarians with Disabilities Policy
- HSMS 13-05 Accessibility Statement of Commitment

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy		June 25/21	New
Update Policy	Annual Review	Jan 18, 2022	001
Update Policy	Annual Review	Jan 13, 2023	002
Update Policy	Annual Review	Jan 22, 2024	003
Added a section stating that due to the hazards of construction, service animals are not allowed on King Paving & Construction sites	Annual Review	Feb 11, 2025	004



Statement of Commitment

King Paving & Construction Ltd. is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

Customer Service

We are committed to engaging with our customers in a respectful manner and making all reasonable efforts to accommodate the communication and access needs of customers with disabilities. This includes communicating in a manner that recognizes the needs of persons with disabilities and enabling the use of assistive devices and service animals in our public spaces.

Customer Service Feedback

We display information about our AODA policy at our facilities and on our website, including instruction on how to provide feedback to us about our standard of service to persons with disabilities. Feedback received will be promptly reviewed and addressed, in a manner that respects the nature of the person's disability. Where a request for information in an accessible format cannot be reasonably satisfied by us, we will provide an explanation.

Employee Training and Awareness

Our employees receive instruction on our policies and procedures to support the principles and objectives of the AODA, including instruction on our Customer Service Standard and how to provide service to persons with disabilities.

Hiring and Employment

On request, we will make every reasonable effort to accommodate the needs of persons with disabilities, to enable otherwise capable persons to participate equally in the hiring process and our workplace, except in circumstances that create undue hardship.

Multi-Year Plan

Since the AODA was introduced, we have maintained a multi-year plan to track our progress with implementation of accessibility requirements applicable to our activities and services. Annually, we review our policy and procedures.

Questions or Feedback

If you have questions, or wish to provide feedback about our how we provide service to persons with disabilities, please let us know by contacting:

Telephone:

[905-639-2995](tel:905-639-2995)

E-mail:



safety@kingpaving.com

Attention: Health & Safety Officer

In writing:

King Paving & Construction Ltd.,
3385 Harvester Road,
P.O. Box 699,
Burlington, ON, L7R 3Y5

Attention: Health & Safety Officer

Disconnecting From Work	Issue Date: March 30, 2022	
	Revision Date: February 11, 2025	
Policy Number: HSMS 13-06	Revision Number: 003	
	 Approved By: President	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all employees, subcontractors, and visitors. The purpose of this policy is to provide written guidelines for health and safety compliance for all jobsites.

The health and well-being of our employees is of the utmost importance and we as a company encourage and support our employees in prioritizing their own well-being. Disconnecting from work is vital for a person's wellbeing as well as sustaining a good work-life balance.

The company recognizes that every employee has the right to disconnect from work outside of their normal working hours unless there is an emergency or agreement to do so (for example while "on-call").

SCOPE AND REGULATION

This policy pertains to all employees, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.

The policy will outline the roles and responsibilities that have been established and will be enforced as part of our due diligence.

DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the company to whom the subcontractor is providing services for (e.g., King Paving & Construction Ltd.)

Compliance – Means the act of being in accordance with established standards, guidelines, or legislation.


Green Book – Occupational Health and Safety Act, O. Reg. 213/91 Regulations for Construction Projects, O. Reg. 851 Regulations for Industrial Establishments

Employment Standards Act: The regulations that pertain to working hours, wages, conditions, vacations, termination, and any other work-related policies.

Competent Person – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance,
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge of any potential or actual danger to health or safety in the workplace.

Supervisor – Means a person who has charge of a workplace or authority over a worker.

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Qualified Person – Is deemed to be qualified due to training and experience with the inspection and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

Worker – A person who performs work or supplies services for monetary compensation. Other persons who work or provide services to an employer for no money, who may be prescribed by regulation includes an unpaid intern, co-op students, and certain other learners.

Work-life Balance: Work-life balance refers to the level of prioritization between personal and professional activities in an individual's life and the level to which activities related to their job are present in the home.

POLICY

To show our support and encourage employees to disconnect from work and create a good work-life balance, whether an employee is working traditional hours in the workplace, working remotely or has a flexible working arrangement, we have developed this policy which is in line with best practice in support of an employee's right to disconnect.

Needs of the Business

Naturally there may, on occasions, be legitimate situations when it is necessary to contact colleagues/ clients/ customers outside of normal working hours, including but not limited to:

- Checking availability for schedules
- To fill in at short notice for a sick colleague
- Where unforeseeable circumstances may arise
- Where an emergency may arise
- Where business and operational reasons require contact outside of normal working hours


Although everyone should be mindful of the right to disconnect, it is important that we are also mindful that situations can arise where it is not possible to deal with matters during normal working hours.

Employer and Employee Obligations

To encourage a culture where employees feel they can disconnect from work; it is important that a joint approach from the company and employees is taken and that we recognize we all have obligations to achieve this.

Employer's Obligation

- Provide employees with information on their working hours.
- Provide employees with details of what their normal working hours are reasonably expected to be under the Employment.
- Ensure employees take rest periods, in accordance with the Ontario Occupational Health and Safety Act and the Ontario Employment Standards Act.

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- Ensure a safe workplace and avoid attempting to contact an employee outside of their working hours where possible.
- To not penalize an employee for acting in compliance with this policy and any relevant provision or performing any duty or exercising any right under the Right to Disconnect legislation.

Employees' Obligations

- Ensure you manage working time while at work, take reasonable care to protect your safety, health and welfare and the health and safety of co-workers.
- To fully cooperate with any time recording methods which the company uses to record working time including when working remotely.
- To be mindful of fellow colleagues', customers'/clients', and all others, right to disconnect (e.g., by not routinely emailing or calling outside normal working hours)
- To notify your manager, in writing, of any statutory rest period or break you were unable to receive on a particular occasion and the reason for not receiving such rest period or break,
- Be conscious of your work pattern and aware of your work-related wellbeing and take remedial action if necessary.

Role of Management

As Superintendents and Foremen have most interaction with their employees, it is important they ensure the employees within their team can disconnect from work outside of normal working hours. Should an employee have concerns surrounding their working time or is unable to disconnect from work, it is important that this is brought to the attention of the Superintendent or Foreman to try to resolve any concerns.


Managers should be mindful of the times emails are sent and should they notice that a member of their team is sending emails at odd hours or are logging in excessively, they should speak to the employee as soon as possible, as this may indicate they are finding it difficult to manage their workload during normal working hours.

Working Hours

Employees' working hours will naturally vary within the Company and everyone's working hours are set out in their Terms and Conditions of Employment. All employees have the right to disconnect in the context of their own normal working pattern and should you have any queries regarding this, please speak to your Direct Report.

Communications

It is important that all employees' personal time is respected, and everyone has the right to disconnect from work outside normal working hours. Therefore, where possible, e-mails etc. should be checked and/or sent only during normal working hours, whilst also appreciating that where work patterns differ, some employees may send communications at a time which is inconvenient to another (i.e., where one employee works during the weekend, and another does not). Where this is the case, the sender should consider the timing of their communication and understand that the recipient will not be expected to respond until they return to work.

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Where a manager sends communications outside normal working hours, unless business and operational needs dictate that an immediate response is required, employees should not feel the need to respond to communications received outside normal working hours.

Automatic Replies

All employees are required to activate an automatic response when taking vacation to cover the full period of vacation being taken. The response should advise the sender that you are on vacation, including the start and end date of the period of vacation and that you will respond to their email on your return or alternative contact details should be provided in the automatic response.

In addition to the above, your supervisor will notify you should you be required to activate an automatic response at the end of your normal working day, which will simply advise the sender of your normal working hours and that you will respond to their email on your return to work.

Meeting

It is important that virtual and face-to-face communication is also respected and in this regard all employees should be mindful of the time of those who are invited to attend a meeting, ensuring those invited play an active role and have something to contribute to the matters being discussed. Where possible, in-person meetings should be scheduled during normal business hours.

Handheld Devices

Some employees, depending on their role, may be provided with a handheld device such as a mobile phone, laptop, tablet, etc.

It is important to be aware that these devices are provided to employees to allow flexibility in how these employees complete their work. This does not imply that the employees are to always make themselves available for work.


Employee Wellbeing

As previously mentioned, the health and wellbeing of our employees is of great importance to us, and we strongly encourage our employees to adapt, if needed, and maintain a good work-life balance. Thus, we encourage all employees, including those who work remotely or make a flexible arrangement, to be proactive, to book in time with family/ friends or engage in an activity after their normal working day to allow themselves to switch off and disconnect from work.

In addition, it is important that those undertaking a flexible working arrangement or remote working disconnect themselves from work and monitor their working hours and remember to take their breaks as this is integral for their own mind and wellbeing.

Raising Concerns

Should an employee have any issues in exercising their right to disconnect, they should raise this with the manager or the safety department immediately to resolve the issues on an informal basis.

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Where the issue is unresolved or an agreement cannot be reached, a meeting will take place to formally discuss the concern. The meeting attendees will include the Company Health & Safety Officer, the employee with the concern, their supervisor and a member from the senior management team with the ultimate goal of reaching an understanding that is fair for all parties.


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Disconnecting from Work Policy.
- Allocate appropriate resources, training, and employees to implement and maintain the Disconnecting from Work Policy and any associated plans.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure the requirements as defined in Section 25 and 26 of OHSA are completed and the Ontario Employment Standards Act regulations are being followed.
- Complete a review of the safety performance monthly, quarterly, and annually for supervisors and implement an action plan as required.
- Conduct an annual performance appraisal for supervisors to review health and safety compliance.

Foremen/Supervisors/Managers/Superintendents will:

- Ensure that workers use the methods, procedures and equipment required by OHSA and all regulations.
- Ensure that all personnel understand the Disconnecting from Work policy and respect the private time of all King Paving & Construction personnel.
- Ensure that workers use or wear equipment, protective devices, or clothing that is required by the employer.
- Advise workers about actual or potential health and safety concerns.
- Give workers written instructions on the measures and procedures to protect themselves, when required.
- Take every reasonable precaution to protect the workers.
- Supervise workers personally or have an assistant, who is a competent person, do so.
- Inspect the workplace, equipment, and tools weekly.
- Ensure all required postings are available in the construction trailers or Health & Safety binders.
- Maintain a company provided Logbook with daily entries as to work activities, performance management or health and safety concerns.
- Complete weekly toolbox talks, and other training material as directed.
- Complete site orientation for workers and subcontractors as required.

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- Prepare a site emergency plan. This plan must be communicated to all workers and discussed at the JHA.
- Take progressive disciplinary measures for workers and subcontractors who do not meet legislative standards.
- Follow the chart for any work refusals. Contact the Health & Safety Department when advised of work refusal.
- Complete the Ministry of Labour Worker and Supervisor Awareness Training within 7 days of assuming the role of supervisor.

Workers will:


- Comply with the health and safety legislation.
- Comply with the Disconnecting from Work Policy and the associated regulations from the Employment Standards Act.
- Never use or operate work in a way that could put yourself or other workers in danger.
- Never remove or make ineffective any protective device.
- Select worker representatives for the JHSC.
- Report any violations of the OHSA, any defective equipment, or any workplace hazard to the employer or supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Never engage in horseplay on site (includes but not limited to the following: pranks, competitions, showing off your strength, rough housing or unnecessary running).
- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures.
- Complete the Ministry of Labour Worker Awareness Training within 7 days of starting work as a new hire.

Health & Safety Representatives and Joint Health & Safety Committee will:

- Be familiar with the green book, emergency procedures and work refusal procedures.
- Be familiar with the Disconnecting from Work Policy.
- Inspect the project at least once a month.
- Make recommendations or report findings about hazards to the employer.
- Get information from the employer about the testing of equipment or materials at the project.
- Be present during an investigation of a work refusal.
- Be consulted about testing and will be present to ensure test results are valid.
- Inspect the scene of a critical injury or death (when required)
- Report on findings to the Ministry of Labour Director.
- Complete the Ministry of Labour Worker and Supervisor Awareness Training.

Subcontractors will:

- Comply with the Company's safety rules.
- Be familiar with the King Paving & Construction Disconnecting from Work Policy.

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- Follow guidelines as outlined in the Subcontractor's Health and Safety agreement.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Disconnecting from Work Policy and any associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to OHS standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Prepare field safety material as required.

TRAINING/RECORD KEEPING


Training shall be arranged or provided, where required, by the Health & Safety Department.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

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REFERENCES

Occupational Health and Safety Act Construction and Industrial Regulations

HSMS 5-01 Company Rules Policy

General Safety Rules and Regulations

Emergency Response Checklist

Posted Materials Checklist

Progressive Discipline Form

Ministry of Labour Worker and Supervisor Awareness Training

CONTINUOUS IMPROVEMENT



This policy and process for legislative program will be reviewed on an annual basis, jointly by Senior Management and JHSC.

Legislative updates will be reviewed to ensure the legislative maintenance program meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Disconnecting from Work Policy written as per changes to the Employment Standards Act.	Change in legislation	March 30, 2022	000
Update Policy	Annual Review	Jan 13, 2023	001
Update Policy	Annual Review	Jan 22, 2024	002
Update Policy Updated reference list	Annual Review	Feb 11, 2025	003

Electronic Monitoring of Employees Policy Statement	Issue Date: October 11, 2022	
	Revision Date: February 11, 2025	
Policy Number: HSMS 13-07	Revision Number: 003	
 Approved By: President		

The Senior Management Team at King Paving & Construction Ltd. is fully committed to the health and safety of its workers and all individuals involved in their projects.

As per changes to the Employment Standards Act, the Company is required to inform all employees if there is an electronic monitoring process in place, and if so, what the process consists of. This policy will be posted and available electronically.

King Paving & Construction does not electronically monitor its employees. Should this change in the future, all employees will be given 30 days' notice as to when monitoring will begin, clearly state what method(s) of monitoring will be utilized, what will be monitored, how the information will be used, and why the monitoring is taking place.

Currently, most company-owned vehicles and equipment are tracked electronically by Geotab.

Geotab logs the location of vehicles and the kilometers driven. This information is used strictly for maintenance purposes and is not used to track employees.

King Paving & Construction Ltd.

John Hutter

President

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Created Policy	New Legislation	Oct 11, 2022	000
Updated Policy	Annual Review	Jan 13, 2023	001
Updated Policy	Annual Review	Jan 22, 2024	002
Updated Policy	Annual Review	Feb 11, 2025	003

WHMIS 2015/GHS Policy	Issue Date: January 1, 2016	
	Revision Date: February 11, 2025	
Policy Number: HSMS 13-08	Revision Number: 010	
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POLICY STATEMENT

King Paving & Construction Ltd. is committed to the protection of our employees from the harmful effects of hazardous substances in the workplace. We will ensure that an appropriate, established, and maintained Workplace Hazardous Materials Information System (WHMIS) is in place and that it is maintained.

SCOPE

This policy applies to all workers at King Paving & Construction Ltd.

DEFINITIONS

American Conference of Governmental Industrial Hygienists (ACGIH®) – An international association of occupation hygienists that develops guidelines for the practice of occupational hygiene, including Threshold Limit Values (TLVs®) and Biological Exposure Indices (BEIs®). This publication serves as the basis for occupational exposure limits in many jurisdictions around the world.

Aspiration Hazards – Hazardous products classified in this hazard class may be fatal if the hazardous product is swallowed and enters the airways. Aspiration toxicity includes severe acute effects, such as chemical pneumonia, varying degrees of pulmonary injury or death, following the entry of a liquid or solid directly through the mouth or nose, or indirectly from vomiting, into the trachea and lower respiratory system.


Biological Exposure Indices (BEIs®) – Guidance values developed by the ACGIH to assess biological monitoring results. Biological monitoring involves the measurement of the concentration of a chemical indicator (such as the substance itself or a chemical formed from the substance by the body) in body components (e.g. blood, urine) of people who have been exposed to the substance. Biological monitoring is used to indicate how much of the substance has been absorbed into the body. The BEI generally identifies a concentration below which nearly all workers should not experience adverse health effects.

Canadian Centre for Occupational Health and Safety (CCOHS) – An occupational health and safety information service with the mandate to promote workplace health and safety and encourage attitudes and methods that will lead to improved worker physical and mental health. CCOHS provides a wide range of products and services, including free access to a large collection of factsheets on occupational health and safety topics.

CANUTEC – CANUTEC stands for Canadian Transport Emergency Centre, which is operated by the Transportation of Dangerous Goods (TDG) Directorate of Transport Canada. CANUTEC provides information and communication assistance in case of transportation emergencies involving dangerous goods. It is accessible in Canada by telephone, 24 hours a day, year-round at (613) 996-6666 (collect) or *666 on a cell phone.

CAS Registry Number – The Chemical Abstracts Service Registry Number. This identification number is assigned to a chemical by the Chemical Abstracts Service, a division of the American Chemical Society.

Chemical Name – A scientific designation of a material or substance:

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- That is made according to the naming rules of either the Chemical Abstracts Service, a division of the American Chemical Society, or the International Union of Pure and Applied Chemistry, or
- That is internationally recognized and that clearly identifies the material or substance. .

Continuous Improvement Plan – Also often called a continuous improvement process (abbreviated as CIP or CI), is an ongoing effort to improve products, services, or processes. These efforts can seek 'incremental' improvement over time or 'breakthrough' improvement all at once.

Globally Harmonized System of Classification and Labelling of Chemicals (GHS) – An international system that defines and classifies the hazards of chemical products and communicates health and safety information on labels and SDSs in a standardized way. The GHS is developed through consensus at the United Nations. The GHS 'purple book' is a guidance document. Only the elements of GHS that have been explicitly adopted by Canadian legislation are enforceable.

Hazard – Is the potential to cause harm or adverse effect on workers in the workplace.

Hierarchy of Controls – Hierarchy of hazard control is a system used in industry to minimize or eliminate exposure to hazards. It is a widely accepted system promoted by numerous safety organizations. Examples include elimination, substitution, engineering, administrative and PPE.

IRS (Internal Responsibility System) – Established joint responsibility between workers and Management to ensure a safe work environment.

Route of Exposure – Refers to the way in which a product can enter the body. Workplace chemicals can affect the body if inhaled, following skin contact (including absorption through the skin) or eye contact, and if ingested (swallowed).


Safety Data Sheet (SDS) – A document that contains specified, required information about a hazardous product, including information related to the hazards associated with any use, handling or storage of the hazardous product in a workplace. (Formerly called MSDS or Material Safety data Sheets)

STEL – STEL stands for Short-Term Exposure Limit (see occupational exposure limit values).

Substance – Any chemical element or chemical compound – that is in its natural state or that is obtained by a production process – whether alone or together with:

- Any additive that is necessary to preserve the stability of the chemical element or chemical compound,
- Any solvent that is necessary to preserve the stability or composition of the chemical element or chemical compound, or
- Any impurity that is derived from the production process.

Threshold Limit Values (TLVs®) – Airborne concentrations of substances to which it is believed that nearly all workers may be exposed day after day without experiencing adverse effects. ACGIH® develops these values.

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NIOSH – NIOSH stands for National Institute for Occupational Safety and Health. NIOSH is a branch of the United States government. It is the mission of NIOSH to develop new knowledge in the field of occupational safety and health, and to transfer that knowledge into practice.

WHMIS – WHMIS stands for Workplace Hazardous Materials Information System. WHMIS is Canada's national hazard communication system for hazardous products in the workplace. It applies to suppliers, importers, and distributors of hazardous products that are sold in or imported into Canada and intended for use, handling or storage in Canadian workplaces, as well as to the employers and workers who use those products.

WHMIS 2015 – On February 11, 2015, the Government of Canada published the Hazardous Products Regulations (HPR), which, in addition to the amendments made to the Hazardous Products Act (HPA), modified WHMIS 1988 to incorporate the GHS for workplace chemicals. This modified WHMIS is referred to as 'WHMIS 2015'.


Workplace – The Occupational Health and Safety Act (OHSA) defines a workplace as any land, premises, location, or thing at, upon, in or near which a worker works. A workplace could be a building, construction site, vehicle, open field, road, or other place where the Company conducts business.

RESOURCES REQUIRED:

- WHMIS 2015 training for all personnel
- Safety Data Sheets for all potentially hazardous products
- Proper WHMIS labels
- P.P.E. that is listed on the safety data sheets when using hazardous products.
- WHMIS training records for subcontractors
- Proper storage containers for hazardous products
- Spill Kits
- First Aid kits and eyewash bottles
- Proper fire extinguishers for each site

STANDARDS/PROCEDURES


- An up-to-date inventory of chemical substances used and stored at King Paving & Construction Ltd. worksites will be maintained by the Health & Safety Department.
- Labelling and identifying hazardous workplace products will be an ongoing process at KING.
- All departments shall have access to Safety Data Sheets (SDS) for hazardous products in their location.
- SDS must precede new product shipments of WHMIS Hazardous Products and be turned over directly to the Health & Safety Department for review, distribution, and filing.
- SDS must precede new product shipments and pass the Health & Safety Department's review before KING receives them.

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- A master set of all SDS will be on file, located in both hard copy and digitally at head office and with all site management personnel. All pertinent safety data sheets are also maintained on SiteDocs. Our SDS program is managed by CCOHS.
- Primary containers are those containers in which a manufacturer/distributor supplies product to the facility. In such cases, the manufacturer/distributor shall ensure that WHMIS labelling requirements are met. No future in-house labelling is required provided that the material is not transferred to another container or that the primary label is not/does not become defaced/illegible.
- Secondary containers store substances which have been prepared in-house or transferred from a primary container. The worker transferring any product from a primary to a secondary container shall ensure that the container is labeled with a workplace label.
- An annual workplace assessment of the WHMIS program will be completed by the Health & Safety Department in conjunction with the JHSC.
- All workers must receive both generic WHMIS training and task specific WHMIS training. The Health & Safety Department will be responsible for coordinating and recording participation details of generic WHMIS 2015 training.
- Supervisors will be responsible for coordinating and recording participation in specific WHMIS training.
- Worker training must be completed at the following times:
 - Prior to the introduction of a new chemical to the workplace.
 - Prior to starting work as a new work assignment.
 - Prior to starting work as a new worker.
- Worker training must cover the following:
 - Information contained on SDS.
 - WHMIS 2015 legislation and symbols.
 - Protective equipment for each specific task.
 - The safe handling and disposal of chemicals and biological agents.
- SDS are valid for three years. SDS do not have an expiry date. Our SDS database is maintained & managed by the Health & Safety Departments and CCHOS (Canadian Centre for Occupational Health and Safety). Once the current SDS has been received, it will be updated to all files.

Supplier Labels:

- The supplier must determine if the product contains any hazardous ingredients. If so, the supplier is responsible for attaching a supplier label to the product prior to shipping.
- If at any time the supplier label becomes illegible or is missing, it must be immediately reported to the Supervisor and must not be used. The supervisor is to contact the Health & Safety department, and they will acquire a new label.

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Workplace Labels:

- Workplace labels are required when the product is transferred from the supplier container to another container or when the supplier label becomes illegible or is missing.
- It is the employer/workers responsibility to attach a workplace label to the new container.
- Workers must read and follow instructions.

RESPONSIBILITIES

Senior Management will:


- Ensure they are familiar with hazardous materials procedures and application.
- Ensure workers, contract personnel or temporary workers are identified and provided with proper and adequate time, tools, and training to perform the work safely.
- Provide information on special requirements for the safe use of a product.
- Ensure all workers understand the need for WHMIS. This also means that responsibilities and procedures are known, understood, and used.
- Ensure proper enforcement of this policy is followed.
- Review and sign the updated standard annually.
- Ensure all required documents are posted in the workplace.
- Review and participate in the program evaluation and action plan for improvement.

Foremen will:

- Attend and participate in training provided by the Company on hazardous materials procedures (WHMIS 2015).
- Advise Management when procedures cannot be followed.
- Follow any component of this policy. Disciplinary action will be taken with any person failing to do so.
- Review the SDS prior to using the product.
- Inform workers that safety data sheets are available to them as required.
- Wear required PPE as outlined on the SDS.
- Ensure workers are wearing the correct PPE and that they follow all safe procedures for the handling, use, care, and storage of potentially hazardous products.

Workers will:

- Attend and participate in training provided by the Company on hazardous materials procedures (WHMIS 2015).
- Advise Management/Foremen when procedures cannot be followed.
- Follow any component of this policy. Disciplinary action will be taken with any person failing to do so.
- Review the SDS prior to using the hazardous product that is new or that they are unfamiliar with.

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- Wear required PPE as outlined on the SDS and follow all safe procedures for the handling, use, care, and storage of potentially hazardous products.

Joint Health & Safety Committee will:

- Inspect the workplace to ensure compliance with this policy.
- Advise on-site Management for any non-compliance of the program.
- Participate in the program updates and inventory listing.
- Attend and participate in WHMIS 2015 training.
- Ensure that all hazardous products are clearly labeled.
- Ensure that all personnel on site wear the correct P.P.E. and follow all proper procedures for the handling, use, care, and storage of potentially hazardous products.

Health & Safety Department will:

- Coordinate the development and administration of the WHMIS 2015 program.
- Ensure current SDS for all materials are accessible for all workers.
- Ensure that current copies of the safety data sheets are maintained on SiteDocs.
- Review SDS for any new materials to be used at KING before purchase to determine if the material is suitable for use.
- Facilitate and/or coordinate training programs.
- Maintain training records.
- Keep abreast of the new legislation in health and safety that will affect the development of the WHMIS program.
- Create and provide a quarterly Continuous Improvement Plan (CIP) to Senior Management.


COMMUNICATION

Communication of this program with regards to the roles and responsibilities will be completed through any of the following forums:

- Annual Safety Day Training
- Safety communication board postings
- New hire worker orientation
- Toolbox talks
- JHSC meetings

The following WHMIS documents are required to be posted in the workplace:

- Any legislated documents.
- WHMIS symbols and classes shall be posted by all chemical storage areas, as well as the Health & Safety Board.
- Valid copies of SDS must be readily available to workers.

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- An up-to-date chemical inventory list ensuring that hazardous products are labeled or identified.

Management is responsible for communicating any revisions of this standard to all workers as soon as reasonably practical.

Records of communication will be maintained on SiteDocs by the Health & Safety Department for a period of three years.

TRAINING

Management and workers of King Paving & Construction Ltd. will be trained in the WHMIS program. Training will include specific information on:

- The contents required on a supplier label and workplace label, and the purpose and significance of the information contained on the labels.
- The contents required on a safety data sheet and the purpose and significance of the information contained on the SDS.
- Procedures for the safe use, storage, handling, and disposal of hazardous products.
- Procedures to be followed in case of an emergency involving a hazardous product.

Training records will be maintained by the Health & Safety Department for a period of three years using SiteDocs.

Training awareness updates on this program will be completed every year at any of the following:

- Annual Safety Day training
- New Hire Orientation
- Toolbox talks
- Management Meetings
- JHSC Meetings

REFERENCES

Occupational Health and Safety Act: Sections 37, 38, 41 and 42


Regulations 860 WHMIS Regulation

Workplace Hazardous Materials Inventory

EVALUATION AND CONTINUOUS IMPROVEMENT

This policy and process for the WHMIS Program will be reviewed on an annual basis, jointly by Senior Management and the JHSC or when:


- The job task or activity changes.
- A new chemical is introduced in the workplace.

WHMIS 2015/GHS Policy	Issue Date: January 1, 2016	
	Revision Date: February 11, 2025	
Policy Number: HSMS 13-08	Revision Number: 010	
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- A hazard is identified.
- An incident, injury or illness is associated with the job task or activity.
- There is a change to legislation, standards, or codes of practice.

Evaluation of the WHMIS Program will be conducted using surveys, site audits and inspection reports. The results of the review will be made in consultation with the JHSC to determine the success of the program. Any gaps will be identified and corrected as required.

Notification of the success of this program will be communicated to all departments and posted on the Health & Safety Board. The amended policy shall be kept as a record of review and the required changes.

WHMIS 2015/GHS Policy	Issue Date: January 1, 2016	
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The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log. An action plan is to be created based on the results of the standard evaluation. Action plan will identify the gap, action to be completed, who will be responsible to complete the action and the timeframe for completion.

Records of the action will be identified on the Continuous Improvement Plan and reviewed by Senior Management on a quarterly basis.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Policy created	New	Jan 1, 2016	000
Update policy to meet program requirements	CIP review for Safety Group	Feb 17, 2017	001
Update policy	Annual review	Feb 18, 2018	002
Update policy	Annual review & company name change	Oct 17, 2019	003
Update policy	Annual review	Feb 13, 2020	004
Update policy	Annual review	Jan 25, 2021	005
Update policy	Annual review	Jan 18, 2022	006
Update policy Added Foreman's Responsibility section Added more responsibilities under each section Added that SDS are maintained on SiteDocs	Annual review	Jan 18, 2023	007
Update policy Added Required Resources section	Annual review	Jan 22, 2024	008
Replaced eCompliance with SiteDocs	Change in safety platform	Nov 14, 2024	009
Minor wording change referring to reading over SDS's Prior to use	Annual Review	Feb 11, 2025	010

Confined Space Policy	Issue Date: October 1, 2006	
	Revision Date: February 11, 2025	
Policy Number: HSMS 13-09	Revision Number: 010	
	 <i>Approved By: President</i>	

POLICY STATEMENT

The purpose of this Confined Space policy is to establish guidelines for the safety of workers who are exposed to or required to work in confined spaces. This policy has been developed in accordance with the Regulations for Confined Spaces, Occupational Health and Safety Act/R.S.O. 199 O. Reg. 632/05 and includes provisions for worker training, hazard identification and control, an entry permit and rescue procedures.

SCOPE AND REGULATIONS

This policy pertains to all workers, Project Managers, Superintendents, Subcontractors and Foremen who may be exposed to or work in a confined space.

Occupational Health and Safety Act Regulation 632 Confined Space.

DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the Company to whom the Subcontractor is providing services to (e.g. King Paving & Construction Ltd.).

Acceptable Entry Conditions – The conditions that must exist in a confined space to allow entry and to ensure the workers involved with a permit required confined space entry can enter and work within the space.

ACGIH – American Conference of Governmental Industrial Hygienists.

Assessment – Assessment of hazards with respect to one or more confined spaces in a workplace described in O. Reg. 632/05.

Attendant – A worker stationed outside the confined space who monitors the authorized entrants and who performs attendant's duties as required by this policy (Safety Watch).

Authorized Entrant – A worker who is trained and authorized by the Company to enter a confined space.

Cold Work – Work that is not capable of producing an ignition.


Competent Worker/Competent Person – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance,
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge of any potential or actual danger to health or safety in the workplace.

Supervisor – Means a person who has charge of a workplace or authority over a worker.

CPR – Cardiopulmonary Resuscitation

Confined Space – A space that is:

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- Large enough and configured space, so that a worker can easily enter and perform assigned work.
- Has limited or restricted means for entry or exit for example (tanks, vessels, wet wells, storage bins, manholes, vaults, and pits are spaces that may have limited means of entry).
- Not designed for continuous occupancy.

Control Measures – A system, device used and or action taken to control or prevent the introduction of physical hazards into a confined space.

Emergency – An occurrence including any failure of hazard control(s), monitoring equipment or event internal or external to the permit space that could endanger entrants.

Engulfment – The surrounding and effective capture of a worker by a liquid or finely divided solid substance that can be aspirated to cause death by filling or plugging the respiratory system of that can exert enough force on the body to cause death by strangulation, constriction, or crushing.

Entry – The action by which a worker passes through an opening into a confined space. Entry includes work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the pane of an opening into the space.

Entry Permit – Written or printed document that is provided by the employer to allow and control entry into a permit space.

Hazardous Atmosphere – An atmosphere that may expose workers to the risk of health, incapacitation, and impairment of ability to self-rescue, injury, or acute illness from one or more of the following causes:


- Flammable gas, vapour or mist in excess of 1% of its lower flammable limit (LFL).
- Airborne combustible dust at a concentration that meets or exceeds its LFL, atmosphere oxygen concentration below 19.5% or above 23% oxygen.
- Atmospheric concentration of a substance for which a dose of permissible exposure limit as published in the case of a workplace that is not a project, the exposure to atmospheric contaminants does not exceed any applicable limit set out in Regulation 833 of the Revised Regulations of Ontario, 1990 (Control of Exposure to Biological or Chemical Agents) made under the Act or Ontario Regulation 490/09 (Designated Substances).
- Any other atmospheric condition that is immediately dangerous to life or health.

IDLH – Any condition that poses an immediate or delayed threat to life or that would cause irreversible health effects of that would interfere with an individual's ability to escape unaided from a confined space (Immediately Dangerous to Life or Health).

Non-Permit Confined Space – A confined space that does not contain or, with respect to the atmospheric hazards, has the potential to contain any hazard capable of causing death or serious physical harm.

Oxygen Deficient Atmosphere – An atmosphere containing less than 19.5% oxygen by volume.

Oxygen Enriched Atmosphere – An atmosphere containing more than 23.5% oxygen by volume.

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Permit Required Confined Space – A confined space for which a written permit is required prior to entry. Permit required confined spaces normally have one or more of the following characteristics:

- Contains or has the potential to contain a hazardous atmosphere.
- Contains a material that has the potential for engulfing an entrant.
- It has an internal configuration such that the entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section.
- Contains any other recognized serious safety or health hazard (such as noise, electricity, radiation, or moving parts of the machinery).

Purging – The method by which hazardous gases, vapours, or other air borne impurities are removed from a confined space.

Rescue – An established emergency response procedure whereby both the rescue personnel and all necessary rescue equipment are available at the incident scene in a timely manner so that it should be possible to commence rescue within five minutes of the start of an emergency.


Testing – The process by which the hazards that may confront entrants in a confined space are identified and evaluated. Testing includes specific tests that must be performed in a confined space.

TLV – Threshold Limit Value

TWAEV – Time Weighted Average Exposure Limit

RESOURCES REQUIRED:

- Confined Space training for entrants, attendants, and supervisors
- WHMIS training for all personnel
- Working at Heights training for all site personnel
- Respirator training and fit testing
- Trained first aid personnel for each site.
- Gas detection monitors (Calibrated every 3 months)
- Tripods and winches (recertified every year)
- Harnesses (recertified every year)
- Safety Data Sheets for potentially hazardous products that may be found in the confined space to be entered.
- Specialized P.P.E. such as respirators, chemical impervious gloves, and suits, etc., as outlined in the safety data sheets.
- Knowledge of O. Reg. 632 – Confined Spaces
- Access to SiteDocs forms


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GENERAL RULES FOR CONFINED SPACE ENTRY

NOTE: Confined Space Entry has been identified as a critical task as per risk assessment RA – Confined Spaces and is on the critical task list on HSMS 2-02 – Critical Task List.

During all permit required confined space entries, the following safety rules must be strictly enforced:

- Only authorized and trained workers may enter the confined space or act as a standby person.
- A pre-entry briefing must take place between the supervisor, attendants, entrants, and all personnel who will be working in the area that the entry is to take place.
- A rescue plan must be determined and in place prior to the confined space entry.
- Air monitoring equipment must be tested prior to entry.
- Personal protective equipment will be provided to workers as necessary for safe entry to a confined space.
- Initial testing of the entry location will be completed to ensure the entry area is safe at ground level.
- Before a worker enters a confined space, the internal atmosphere must be tested at a minimum of three levels (top, middle, and bottom) of the confined space with a calibrated direct reading instrument of oxygen content, flammable vapours, and potential toxic air contaminants.
- All testing shall be conducted by a properly trained individual. Upon entry, continuous atmospheric monitoring is required.
- No smoking is permitted in a confined space or near an entrance or exit location.
- During a permit required confined space entry, an attendant must always be present. The attendant must not have any other duties assigned to them as their primary function is to monitor the activities in the space.
- Constant visual or voice communication must be maintained between the attendant and workers entering the confined space.
- No bottom or side entry may take place, or work conducted below the level of any material that could cause engulfment.
- Any conditions making it unsafe to remove an entrance cover shall be eliminated before the manhole cover is removed.
- When the entrance covers are removed, the opening shall be promptly guarded by a railing, temporary cover, or other temporary barrier that will prevent an accidental fall through the opening and that will protect each worker working in the space from foreign objects entering the confine space.
- There may be NO hazardous atmosphere within the space when a worker is inside the space except during rescue operations. These individuals would be considered as trained professionals in confined space entry such as site-specific rescue teams, third party confined space rescue professionals or the fire department.
- Continuous forced air ventilation shall be provided for confined space entries when gas levels are not acceptable and shall include the following:
 - A worker may not enter the space until forced air ventilation has been in operation for a minimum of five minutes to eliminate any hazardous atmosphere.

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- The forced air ventilation shall be directed to ventilate the immediate areas where a worker is or will be present within the space and shall continue until all workers have left the space.
- The air supply for the forced air ventilation shall be from a clean source and may not increase the hazards in the space.
- All confined space shall be considered 'Permit required Confined Space' until the pre-entry procedures as required for a Non-Permit Confined Space Entry, as detailed elsewhere in this policy demonstrates otherwise.

CONFINED SPACE PERMIT

To control and monitor confined space entries, a written entry permit is hereby established and shall require the following:

A confined space hazard assessment and permit form must be completed before any worker enters a permit required confined space. The hazard assessment and the entry permit may be completed and signed by either the site Foreman and/or the attendant depending on the jobsite. The permit must be signed before entry is permitted, which is controlled by the attendant. The Foreman and/or attendant will ensure the permit specifies the following:


- Location
- Type of work
- Personal protection measures
- Authorized entrants
- Monitoring equipment
- Hazards of the permit space
- Control measures

If rescue equipment is required, it must be noted on the permit. The procedures for contacting rescue services will be included in the permit which is site specific. Company rescue procedures must always be arranged prior to any confined space entry.

Only people trained in confined space entry procedures may use the permit system. Training will expire every three years from the date of training.

Permits may expire before the completion of work on the shift or if any pre-entry conditions change. When this is the case, the space will be evacuated, re-evaluated, and a new permit will be utilized. The permit will be available at the worksite outside the confined space area. All confined space entry permits will be submitted to the office within 48 hours once the work has been completed. Permits and related information will be kept on file for a period of one year. In the event of a chemical exposure during a confined space entry, records pertaining to that exposure will be kept for the duration of the employment plus 20 years for medical surveillance.

The attendant shall sign the permit prior to allowing entry and ensure that entry operation remains consistent with the terms of the permit.

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If during the entry, a potential hazardous situation occurs which exceeds the conditions authorized on the permit, the confined space shall be terminated immediately and the individual permit for this entry shall be revoked. The immediate Supervisor must be contacted and made aware of the situation.

Hot work requires additional consideration and must be discussed with the immediate Supervisor.

The permit is terminated after the entry has been completed or at the end of a ten-hour shift.

Rescue procedures may need to be coordinated with the specific site. Ensure all workers are fully aware of the site requirements and procedures in the event an onsite rescue is required. Everyone on the team needs to be fully aware of the emergency procedures prior to entry of the confined space. This will be communicated at the JHA which is to be completed prior to entry.

ENTRY PROCEDURES FOR PERMIT REQUIRED CONFINED SPACES

Each worker who enters or is involved in a permit required confined space must:

- Understand the procedures for confined space entry.
- Know the hazards of the specific space.
- Review the specific procedures for each entry.
- Understand how to use entry and rescue equipment.
- Review the rescue plan and each person's role in the plan.
- Wear a personal monitor while entering and working in the confined space.

Confined Space Entry Permit and a Confined Space Hazard Assessment must be properly completed by a qualified person prior to entry into a permit required confined space.


Only properly trained and authorized individuals will be allowed to enter a permit required confined space. Authorized entrants will always maintain contact with the attendant.

Atmospheric testing of all confined spaces must be completed, in accordance with acceptable procedures, for a minimum of five minutes prior to entry and use of any mechanical ventilation of the space. Record the results on the Entry Permit.

Continuous atmospheric monitoring is required once entrants are in the confined space. If at any time during this process, a potentially hazardous atmosphere is detected, the confined space entry shall terminate immediately. The space is to be vented and retested prior to any re-entry. If ventilation does not clear the hazardous condition, the immediate Supervisor must be contacted.

All permit required confined spaces shall be adequately ventilated for a minimum of five minutes prior to entry and continuous ventilation is required for the duration of the entry only if the test fails.

Each worker entering the confined space will have a safety retrieval line/fall protection attached to the body harness. The other end of the retrieval line will be secured to an anchor point or lifting device outside the entry portal.

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The anchor point must not be secured to a motor vehicle in a manner that would pull the line out of the space if the vehicle moved.

During the confined space entry, all safety rules and procedures will be followed. This shall include the use of any other required personal protective equipment. A metal ladder **MUST NOT** be used when working around electrical equipment. There will be no smoking in the confined space. All workers must follow the site-specific smoking policy or Company smoking policy whichever is stricter. Any use of chemicals, welding, soldering, or cutting must be pre-approved by the immediate Supervisor and implement additional controls as required.

A breathing apparatus is required for entry into an unknown atmosphere and rescue situations. Breathing systems (SCBA systems will be rented and will be pre-arranged by the immediate Supervisor when required). No entry is permitted when there is an atmosphere that poses a potential danger to life or health without a proper breathing system.


Electrical equipment used in the confined space will be appropriate for the hazard and meeting the requirement of the National Electrical Code or the hazardous atmosphere that is present.

Any condition making it unsafe to remove an entrance cover will be eliminated before the cover is removed. Before the cover is removed, the opening(s) shall be guarded to prevent an accidental fall into the opening and prevent objects from falling into the opening.

Appropriate public barriers will be used to protect the workers and the public.

RESCUE PROCEDURES

- If the gas alarms alert, the entrant(s) must leave the work site and exit the confined space.
- The attendant must initiate an emergency plan for the site. Other workers at the site location must be made aware of the emergency air horn.
- The designated rescue team must immediately start rescue procedures by engaging the winch on the tripod.
- If the worker becomes unconscious, **NEVER LET ANYONE ENTER THE CONFINED SPACE.**
- The attendant will need to ensure 911 is called and provide the location of the jobsite and the number of workers in distress. If the site is large, someone may have to be designated to meet the ambulance and direct them to the location.
- If the rope or cable becomes tangled, **DO NOT ENTER** the confined space. Attempt to untangle from the surface if possible.
- Once the entrant(s) has been removed from the confined space, the designated rescue person must initiate first aid procedures. First aid must not be administered inside the confined space.
- The designated first aider must immediately report the first aid after the worker has been treated and everyone is safe.
- Notify the immediate Supervisor and the Health & Safety Department when it is convenient to do so without interfering with the safety of the workers on site.

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- Follow-up meetings will be arranged as part of the accident investigation with the Health & Safety Department, JHSC certified members and the Management of the jobsite.
- Do not discuss the details of the event with anyone other than Company officials.
- Any pictures taken as part of the event shall only be shared with Company officials. Pictures are not to be posted on social media without written consent from the Company.
- If the Ministry of Labour must be notified, all Company personnel are expected to fully cooperate with the investigation.

ROLES AND RESPONSIBILITIES

Senior Management will:


- Assume ultimate responsibility for the development and implementation of an effective Confined Space Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Confined Space Program.
- Review the Policy at least annually and approve all revisions. A signature is required on this Policy as proof of approval.
- Review gap analysis and take the assigned actions to correct identified gaps in the programs.
- Ensure that compliance reviews are completed quarterly and annually at the established Management meetings.
- Ensure that the equipment is properly inspected for the Confined Space Program action plan.
- Ensure worker training is completed for confined space entry.
- Ensure that all records for confined space are kept on file for at least one year.
- Ensure that the Program elements have been communicated to all members of the Company.

Foremen/Supervisors/Managers/Superintendents will:

- Establish approved methods to ensure the responsibilities are met by all levels in the organization.
- Be knowledgeable in the Confined Space Policy Program and the established safety goals of the Company.
- Contact the Health & Safety Department for support, as required, to ensure the ongoing compliance of the Confined Space Program.
- Provide properly inspected equipment for the confined space entry.
- Ensure confined space assessments have been completed and reviewed.
- Ensure all required permits are completed and submitted to the office within 48 hours.
- Ensure the policy and procedures are applied consistently.

Confined Space Attendant will:


- Be knowledgeable of the hazards workers may encounter upon entering a confined space.

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- Perform a pre-operational review of activities in designated confined spaces and discuss with entrants the potential hazards, safeguards and PPE required for the project.
- Verify training certificates of third-party entrants and maintain a copy of training records on site. If training records are not present at the time of entry for the attendant's review, no entry is permitted. The supervisor should be notified immediately.
- Hold a valid First Aid certificate and have immediate access to a first aid kit. CPR may have to be initiated in an emergency when a worker shows no sign of life.
- Ensure there is one rescue person assigned to each entrant for the purpose of emergency response.
- Sign the confined space permit verifying that all actions and conditions necessary for safe entry are provided and maintained.
- Take appropriate measures to remove unauthorized personnel from working in and around the confined space area.
- Complete all required atmospheric testing before anyone is allowed to enter the confined space.
- Ensure lock out tag out has been completed if required prior to the job start.
- Ensure that all individuals who enter or leave a permit required confined space are continually accounted for and signed in and out on the permit.
- Assist in creating the site-specific emergency plan. Implement that rescue plan as required.
- Always establish and maintain good communication with the entrant(s) either verbally, with hand signals or by radio contact when communicating by voice is obstructed.
- Sign the confined space permit and follow the guidelines of the permit.
- Ensure entrance to the confined space is adequately secured against unauthorized entry.
- Provide the work zone with adequate barricades and adequate warning signs regarding unauthorized entry or both if required.
- Never leave the assignment while workers are inside the confined space.
- Notify everyone to evacuate the confined space if you observe a hazardous condition.
- Call EMS/911 for help if an emergency arises (Do not attempt to enter a confined space during an emergency). The attendant/rescue team will rescue a victim from a confined space using a retrieval system.

Workers Entering Confined Space (Entrants) will:

- Complete the required training in confined space as provided by the employer. Entrants must be able to prove that they have received effective training on either this procedure or an equivalent training program and understand the requirements of O. Reg. 632/05.
- Be competent and knowledgeable to recognize the hazards associated with working in confined spaces.
- Follow the direction of the Foreman/Attendant with regards to work instruction and hazard controls for the project.
- Always complete an inspection of all PPE prior to entering the confined space. Report any concerns to the onsite attendant or the immediate Supervisor.

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- Always establish and maintain good communication with the entrant(s) either by verbal, hand signals or radio contact.
- Alert the attendant whenever the entrant recognizes any warning signs or symptoms of exposure to a dangerous situation, or any prohibited condition is detected.
- Establish and maintain good communication with the attendant at all times either verbally or by hand signals. If line of sight cannot be maintained or communicating verbally is obstructed, two-way radio between the attendant and the entrant in the confined space will be required. One radio per group of workers inside the space is acceptable if entrants can maintain line of sight with each other.

Subcontractors will:


- Have awareness, understanding and acknowledgement of King Paving & Construction Ltd.'s Confined Space Program.

Joint Health & Safety Committee members will:

- Work together with the Health & Safety Department and Management to review the Confined Space Program annually and make recommendations for continuous improvements.
- Re-enforce compliance of the Company's Confined Space Program.
- Report any non-compliance of the Program and initiate stop work as required.

Health & Safety Department will:

- Ensure that the Confined Space Program and relevant operating procedures are maintained at the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the Policy requirements.
- Ensure that the requirements of the Program are embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Health & Safety Day, Toolbox Talks or on-site training.
- Review and log all confined space entries in the Company's database. Scanned copies of the confined space permits will be kept at Head Office and available for review as requested.
- Present the results to all levels of Management and the JHSC.
- Promote feedback and recommendations from workers.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Be responsible for scheduling meetings and invitations to those involved in the review process.
- Keep abreast of the updated legislation with regards to OHS standards through industry education.
- Be responsible for updating the Policy on an annual basis with Senior Management and the JHSC.
- Complete required training to maintain and support the Confined Space Program.
- Ensure compliance with the audit requirements of the Confined Space Program.

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TRAINING/RECORD KEEPING

All workers and Management who may be required to participate in confined space entry shall be trained at least every three years on the policy and procedures.

Additional training with regards to site specific requirements will be reviewed prior to confined space entry on any jobsite.

Any training in confined space must be completed by a certified trainer. Proof of training certification will be required prior to any classes being scheduled for the Company. Individual training cards will be issued and required as proof of training on the jobsite.

Digital copies of the record of training will be maintained in the Company's training matrix or through SiteDocs.

All Subcontractors will be required to provide evidence of training compliance for any workers who may be required to perform confined space entry on behalf of the Company.

Training must be provided for workers when:

- There is a change in the workers' duties.
- There is a change in permit space operations that present a hazard which a worker has been previously trained.
- There are deviations from the permit space entry procedures outlined by this Policy or when there are inadequacies in the worker's knowledge or use of these procedures.


Workers shall be trained in the proper use of air monitoring equipment prior to conducting confined space entry work including the use of any applicable safety equipment.

Workers involved in confined space entry shall be trained and fitted to use the 3M half mask respirators. Fit testing will be completed every two years or if there is a change in facial structure and the seal cannot be achieved when conducting positive and negative seal checks. Fit testing will be completed by a competent, qualified source.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors who participate in confined space entry will be trained in their responsibilities to communicate this Policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts

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- Toolbox talks
- Company emails
- Annual Safety Day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

IHSA Health & Safety Manual 2017 Edition

IHSA Entry and Work in Confined Space Manual SPG3

Regulation 632 – Confined Spaces

Reg. 1101 First Aid

Occupational Health and Safety Act

Confined Space Entry Permit (HSF 11.6)

Confined Space Bump Test Record (HSF 11.0)

Confined Space Decision Tree (HSF 11.5)

Confined Space Hazard Assessment (HSF 11.1)

Confined Space Rescue Plan – the rescue plan is documented on the bump test record (HSF 11.0)

HSMS 2-02 – Critical Task List

Risk Assessment RA – Confined Spaces

CONTINUOUS IMPROVEMENT

This Policy and process for the Confined Space Program will be reviewed on an annual basis, jointly by Senior Management, the Health & Safety Department and the JHSC.

Legislative and industry updates will be reviewed to ensure the Confined Space Program meets the guidelines as required for Elements #2, 3, and 13 in the Ontario Provincial COR Program.

The amended policy shall be kept as a record of review and the required changes.

The revision of the Policy shall be tracked at the bottom of the Policy and recorded on the maintenance and tracking log.

<i>Cranes, Hoists, and Rigging Procedures</i>	Issue Date: December 1, 2020	
	Revision Date: February 12, 2025	
Policy Number: HSMS 13-10	Revision Number: 006	
 Approved By: President		

POLICY STATEMENT

The purpose of this policy is to ensure that all workers at sites where cranes, hoists, and lift trucks are used understand the safety procedures that must be followed to provide a safe work environment.

SCOPE

This policy pertains to all workers, project managers, superintendents, foremen, and subcontractors who may be on a King Paving & Construction site.

DEFINITIONS

Rigging - The process of attaching slings or other devices to a load prior to lifting it.

STANDARD/PROCEDURE


All crane work must be pre-planned to ensure the safety of the process. It is the responsibility of the contractor and/or crane equipment supplier to ensure any crane used at the construction site is in safe working condition.

Due to the seriousness of crane safety procedures, any operator or supervisor who violates procedures will be subject to immediate disciplinary action, up to and including removal from the site.

The following documentation must be supplied with the crane and reviewed by project management prior to any work:

- The crane has been inspected and maintained in accordance with standard regulations.
- The crane complies with all applicable regulatory or special requirements of the site. Cranes will be equipped with an anti-two-blocking device.
- Operator's plan must be available in the cab of the crane.
- The crane has a current annual inspection by a person qualified to inspect and certify cranes and legislation requirement.
- Logs for daily, weekly, monthly, and annual inspections are available in the crane cab for inspection.
- The operator must have a current crane safety-training card or documentation verifying the operator's qualifications to operate this specific type of crane. The crane operator will be licensed by the local authority having jurisdiction.
- Written safe crane operating procedures are available in the crane cab. These are to be written by the company. The operator's plan may not be used in lieu of separate safety procedures.

At no time will a crane be operated with computer systems or limit switches in a non-functioning or override condition.

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The weight of the load must be known (not estimated) or means taken to accurately weigh the load before any the load is lifted.

The rated load capacity (or load chart) must be clearly marked on a lifting device and in readable condition

All cranes, hoists, forklifts, or other lifting devices must be inspected by the operator of the device at the beginning of each shift prior to use in accordance with the manufacturer's recommendation. Operators are to use the pre-shift inspection form located on SiteDocs and submit the form upon completion of the inspection. Any defective equipment must be taken out of service, tagged, or locked out and reported to the supervisor. Equipment that has been taken out of service must not be used until the repairs have been completed by a competent source.

All outriggers must be fully extended and set on stable ground and solid cribbing before any lift.

All rigging gear is inspected before each use. Damaged equipment must be immediately taken out of service.

All rigging gear must be rated safe capacity for the lift.

Use of a dedicated signal person must be considered in site planning.

More than one load rigged from the hook is prohibited.

Under no circumstances will workers ride the hook.

Critical Lifts


A critical lift is any lift that is 80% or greater of the rated capacity of the crane pick configuration, will require a lift plan. It may be considered a critical lift if a collision, upset, or dropping could result in any one of the following:

- Unacceptable risk of worker injury or significant adverse health impact (on or off site).
- Significant release of a hazardous material or other undesirable conditions.
- Undetectable damage that would jeopardize future operations or the safety of a facility.
- Damage that would result in unacceptable delays to schedule or other significant program impact such as loss of vital data.
- If the load requires exceptional care in handling because of size, weight, close-tolerance installation, high susceptibility to damage, or other unusual factors.

Multiple Cranes

When multiple cranes are on site the following procedures must also be followed:

- Crane Lift operating meetings will be held before work starts

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Attendance: Operators, Dedicated signal workers and riggers, Foremen of crews using cranes.

- A written working lift plan, Work plan, JHA (Job Hazard Analysis) must be submitted as part of the project safety plan to project management for the use of multiple tower cranes, including a tower crane and mobile cranes, prior to work on a site. Crane Lift Plan meetings must be held between Safety Officers, Supervisors, and project owners/engineers to verify and approve such plan before lifting.
- Radio communications between all operators and signal personnel.
- Quadrants of operation clearly defined.

The following regulations must be strictly adhered to with respect to cranes (including tower cranes), hoists and rigging:

CRANES, HOISTING AND RIGGING

150. (1) Subject to subsection (2), no worker shall operate a crane or similar hoisting device unless the worker holds a certificate of qualification issued under the *Ontario College of Trades and Apprenticeship Act, 2009*, that is not suspended, or the worker is an apprentice and is working pursuant to a training agreement registered under that Act, that is not suspended, in the trade of,

- (a) hoisting engineer — mobile crane operator 1, if the worker is operating a crane or similar hoisting device capable of raising, lowering or moving any material that weighs more than 30,000 pounds;
- (b) hoisting engineer — mobile crane operator 1 or hoisting engineer — mobile crane operator 2, if the worker is operating a crane or similar hoisting device capable of raising, lowering, or moving only material that weighs more than 16,000 pounds but no more than 30,000 pounds; or
- (c) hoisting engineer — tower crane operator, if the worker is operating a tower crane. O. Reg. 88/13, s. 1.

(1.1) Subsection (1) does not apply when a worker is using excavation equipment to place pipes into a trench. O. Reg. 631/94, s. 3.


(2) No worker shall operate a crane or similar hoisting device, other than one described in subsection (1), unless,

- (a) the worker has written proof of training indicating that he or she is trained in the safe operation of the crane or similar hoisting device; or
 - (b) the worker is being instructed in the operation of the crane or similar hoisting device and is accompanied by a person who meets the requirements of clause (a). O. Reg. 213/91, s. 150 (2).
- (3) A worker shall carry his or her proof of training while operating a crane or similar hoisting device. O. Reg. 213/91, s. 150 (3).

151. (1) No crane or similar hoisting device shall be subjected to a load greater than its rated load-carrying capacity. O. Reg. 213/91, s. 151 (1).

(2) The manufacturer of a crane or similar hoisting device or a professional engineer shall determine its rated load-carrying capacity in accordance with,

- (a) for a mobile crane, Canadian Standards Association Standard Z150-1974 Safety Code for Mobile Cranes; and
 - (b) for a tower crane, Canadian Standards Association Standard Z248-1976 Code for Tower Cranes. O. Reg. 213/91, s. 151 (2).
- (3) Every crane or similar hoisting device shall have affixed to it a load rating plate,
- (a) that the operator can read while at the controls; and

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(b) that contains enough information for the operator to determine the load that can be lifted for each configuration of the crane. O. Reg. 213/91, s. 151 (3).

(4) A luffing boom crane, other than a tower crane, shall have affixed to it a boom angle indicator that the operator can read while at the controls. O. Reg. 213/91, s. 151 (4).

152. (1) The owner of a crane or similar hoisting device shall keep a permanent record of all inspections of, tests of, repairs to, modifications to and maintenance of the crane or similar hoisting device. O. Reg. 213/91, s. 152 (1).

(2) The owner of a crane or similar hoisting device shall prepare a logbook for it for use at a project that shall include the record referred to in subsection (1) covering the period that is the greater of,

(a) the immediately preceding twelve months; and

(b) the period the crane or similar hoisting device is on the project. O. Reg. 213/91, s. 152 (2).

(3) The logbook shall be kept with the crane or similar hoisting device. O. Reg. 213/91, s. 152 (3).

(4) The owner of a crane or similar hoisting device shall retain and make available to the constructor on request copies of all logbooks and records for the crane or similar hoisting device. O. Reg. 213/91, s. 152 (4).

153. (1) No worker shall use as a workplace a platform, bucket, basket, load, hook, sling or similar device that is capable of moving and is supported by a cable attached to the boom of a crane or similar hoisting device, except in accordance with this section. O. Reg. 631/94, s. 4.

(2) A crane may be used to raise, support, or lower a worker only if,

(a) conventional access equipment cannot be used;

(b) the platform that the worker is on,

(i) is designed by a professional engineer in accordance with good engineering practice,

(ii) is constructed in accordance with the design drawings,

(iii) is equipped with more than one means of suspension or support,

(iv) is equipped with anchor points for the attachment of the worker's fall arrest systems,

(v) is equipped with a guardrail in accordance with section 26.3,

(vi) is suspended from, or supported by, a direct attachment to the boom of the crane,

(vii) is designed, constructed, and maintained so that the failure of one means of support or suspension will not cause the collapse of all or part of the platform, and

(viii) has its maximum rated load capacity legibly and permanently marked in a conspicuous place on it; and

(c) the crane,

(i) is equipped with fail-safe mechanisms that will prevent the boom and the suspended platform from free falling in the event of a power source or system failure or the inadvertent release of any operating controls,


(ii) is not used to hoist material while the platform is being used to support a worker,

(iii) is not loaded in excess of 25 per cent of its maximum rated load,

(iv) has a revised load rating chart prepared by a professional engineer in accordance with good engineering practice and affixed in a conspicuous place on the crane,

(v) has, on its hoist line, hooks equipped with self-closing safety catches at the point where the platform is suspended, and

(vi) is equipped with an automatic limit switch that prevents the platform and load from reaching beyond the highest permissible position specified by the crane manufacturer. O. Reg. 631/94, s. 4; O. Reg. 527/00, s. 5.

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(3) Any modifications or repairs to the boom of the crane shall be made in accordance with the instructions of the crane manufacturer or a professional engineer. O. Reg. 631/94, s. 4.

(4) Every worker on the platform shall wear a full body harness connected independently to anchor points on the platform and used in conjunction with a lanyard fitted with a shock absorber. O. Reg. 631/94, s. 4.

(5) The design drawings of the platform shall,

- (a) set out the size and specifications of all components of the platform, including the type and grade of materials used for it;
- (b) state the maximum live load of the platform;
- (c) specify the model and type of crane to be used in conjunction with the platform; and
- (d) include a statement that, in the opinion of the professional engineer who designed the platform, the design meets the requirements of clauses (a), (b) and (c).
- (e) REVOKED: O. Reg. 85/04, s. 16.

O. Reg. 631/94, s. 4; O. Reg. 85/04, s. 16.

(6) Before the platform is used, a competent worker shall inspect it and verify in writing that it has been constructed in accordance with the design drawings. O. Reg. 631/94, s. 4.

(7) No person shall use the platform until the verification required under subsection (6) is given. O. Reg. 631/94, s. 4.

(8) Before the crane is first used to lift persons, and at least once every 12 months after the first test, a professional engineer shall ensure that the crane be subjected to non-destructive testing to ensure the structural integrity of the crane. O. Reg. 242/16, s. 15.

(9) A competent worker shall visually inspect the crane's structural elements and the rigging equipment for defects before each use of the crane. O. Reg. 631/94, s. 4.

(10) The employer shall ensure that an adequate means of communication between the worker on the platform and the crane operator is established, maintained, and used. O. Reg. 631/94, s. 4.

(11) Before beginning any hoisting operation under this section, the constructor shall notify by telephone an inspector in the office of the Ministry of Labour nearest to the project. O. Reg. 631/94, s. 4.

(12) The employer shall ensure that every worker involved with the hoisting operation receives adequate instructions about the requirements, restrictions and hazards associated with the hoisting operation. O. Reg. 631/94, s. 4.

(13) The employer shall develop adequate emergency rescue procedures and communicate these in writing to all workers involved with the hoisting operation. O. Reg. 631/94, s. 4.

(14) The constructor shall keep all design drawings, test reports, written statements and certification documents required under this section with the crane at all times during the hoisting operation. O. Reg. 631/94, s. 4.

(15) On request, the constructor shall provide an inspector with copies of any document described in subsection (14). O. Reg. 631/94, s. 4.


154. (1) A crane or similar hoisting device shall be set up, assembled, extended and dismantled only by a competent worker acting in accordance with the written instructions of the manufacturer and in such a manner as to not endanger any person or property. O. Reg. 213/91, s. 154 (1).

(2) No crane or similar hoisting device shall include sections that are not designed for it or that are damaged. O. Reg. 213/91, s. 154 (2).

(3) No crane or similar hoisting device shall include nuts, bolts, pins or fastenings that are not the size and quality specified by the manufacturer. O. Reg. 213/91, s. 154 (3).

155. Unless otherwise specified by its manufacturer, a crane or similar hoisting device,

- (a) shall be equipped with a device to indicate whether its turntable is level; and

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(b) shall be operated with its turntable level. O. Reg. 213/91, s. 155.

156. An outrigger or stabilizing device used on a crane or similar hoisting device,

- (a) shall be extended to meet load capacity chart requirements; and
- (b) shall rest on blocking able to support the crane or similar hoisting device and its maximum load without failure or without deformation or settlement which affects its stability. O. Reg. 213/91, s. 156.

ROTARY FOUNDATION DRILL RIGS

156.1 (1) Before the start of any drilling operation on a project with a rotary foundation drill rig,

- (a) an inspection of the work area shall be conducted to identify,
 - (i) potential hazards, including utilities, services, obstructions, structures and soil conditions that may endanger a worker engaged in, or in the vicinity of, the drilling operation, and
 - (ii) buildings and structures adjacent to, or in the vicinity of, the drilling operation that may be affected by it;
- (b) any hazards identified under subclause (a) (i) shall be removed if practicable;
- (c) if it is not practicable to remove the hazards identified under subclause (a) (i),
 - (i) if practicable, they shall be disconnected or inactivated so as not to endanger workers engaged in, or in the vicinity of, the drilling operation, and
 - (ii) they shall be located and marked by signs; and
- (d) a written report shall be prepared that indicates,
 - (i) all of the hazards identified under subclause (a) (i),
 - (ii) which hazards have not been removed, and
 - (iii) which hazards have been disconnected or inactivated. O. Reg. 345/15, s. 19.


(2) The constructor shall keep a copy of the report mentioned under clause (1) (d) at the project until the drilling operation is completed, and make the report available, upon request, to an inspector and an employer responsible for the drilling operation. O. Reg. 345/15, s. 19.

156.2 (1) Before a drilling operation begins, the employer responsible for it shall,

- (a) develop written measures and procedures in accordance with subsection (2) to protect the health and safety of workers engaged in, or in the vicinity of, the drilling operation; and
- (b) have a copy of these written measures and procedures provided to, and reviewed with, the workers engaged in the drilling operation. O. Reg. 345/15, s. 19.

(2) The written measures and procedures required under subsection (1) shall include, at a minimum, details of,

- (a) the measures and procedures to be implemented to protect workers from all unremoved hazards;
- (b) the procedures to be implemented for the assembly, erection, disassembly, alteration and operation of the drilling equipment;
- (c) the safe work areas that have been designated for,
 - (i) the drilling operation,
 - (ii) the staging, disassembly and alteration of the drilling equipment, and
 - (iii) the storage of any excavated soil and material;
- (d) the procedures to be implemented for removing excavated soil and material;


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- (e) the restricted access zone that has been designated around the drilling operation to restrict or prevent access by persons or equipment;
 - (f) the fall protection measures, in addition to those required under sections 26.1 to 26.9, to be implemented to prevent workers from falling into a drill hole or being engulfed by collapsing soil around a drill hole, while or after the hole is drilled; and
 - (g) the communications system to be used among the drill rig operator, the drill rig front-end worker and other workers in the restricted access zone, or a system of prearranged visual signals to be used among them if those signals are clearly visible and understood by them. O. Reg. 345/15, s. 19.
- (3) Workers shall follow the written measures and procedures. O. Reg. 345/15, s. 19.

156.3 Sections 156.4 and 156.5 apply when a drilling operation at a project uses a rotary foundation drill rig that can exert a ground pressure of 200 kilopascals or more under its tires, crawlers or outrigger pads in any configuration, including during its operational activities. O. Reg. 345/15, s. 19.

156.4 (1) Before a drilling operation described in section 156.3 begins, a professional engineer shall,

- (a) design a supporting surface for the drill rig in accordance with good engineering practice to adequately support the drill rig during all drilling and drill rig set-up activities;
 - (b) designate and design a path of travel for the drill rig to use on the project to ensure the path of travel safely supports the drill rig; and
 - (c) prepare a written report described in subsection (2). O. Reg. 345/15, s. 19.
- (2) The written report required under clause (1) (c) shall include, at a minimum, details of,
- (a) the project and its location;
 - (b) the designs and specifications for the supporting surface and path of travel;
 - (c) any operating restrictions imposed by the drill rig manufacturer's instructions, including the maximum safe ground slope for the drilling operation;
 - (d) the existing soil conditions, all associated hazards to workers' health and safety and the precautions to be taken to protect workers from the hazards associated with the soil conditions;
 - (e) the minimum load-bearing capacity of the supporting surface required for each activity to be undertaken by the drill rig;
 - (f) the surface preparation required for the supporting surface and path of travel to safely support the drill rig during its operation and travel;
 - (g) the parts of the drill rig and the attachments of the drill rig that are permitted on the supporting surface;
 - (h) the precautions to be taken to ensure that the drilling operation and movement of the drill rig on the path of travel,
 - (i) do not damage or affect the stability of any building, structure, property or public way adjacent to, or in the vicinity of, the drilling operation, and
 - (ii) do not endanger a person using any building, structure, property or public way adjacent to, or in the vicinity of, the drilling operation;
 - (i) the frequency of inspections of the supporting surface and the path of travel of the drill rig, and the type of inspection required, to ensure they remain stable, do not deteriorate and continue to function as designed by the professional engineer, and any specific weather or other conditions that could affect the supporting surface or path of travel that would require additional inspections to be conducted; and
 - (j) the qualifications of the person who conducts the inspections of the supporting surface and path of travel and whether the person needs to be a professional engineer, a person under the direction of a professional engineer, a competent worker or another person with specified qualifications. O. Reg. 345/15, s. 19.

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(3) The supporting surface and path of travel for the drill rig shall be prepared or constructed in accordance with the professional engineer's written report. O. Reg. 345/15, s. 19.

(4) No deviation from the written report is permitted unless the deviation is approved, in advance and in a written report, by a professional engineer. O. Reg. 345/15, s. 19.

(5) The supporting surface and path of travel for the drill rig shall be inspected by a professional engineer after they are prepared or constructed and before the drill rig is assembled and erected on the supporting surface or uses the path of travel to confirm that they were prepared or constructed in accordance with the professional engineer's report. O. Reg. 345/15, s. 19.

(6) The professional engineer shall prepare a written report of the results of the inspection under subsection (5). O. Reg. 345/15, s. 19.

(7) While a rotary foundation drill rig is in service at a drilling operation described in section 156.3, the employer responsible for the drilling operation shall ensure that,

- (a) the supporting surface and path of travel are regularly inspected in accordance with, and by the person identified by, the report described in subsection (2); and
- (b) a written report of the inspections and results are kept at the project and made available to an inspector upon request. O. Reg. 345/15, s. 19.

(8) The constructor and employer responsible for the drilling operation shall keep at the project a copy of all reports described in this section and make them available to an inspector upon request until the drilling operation is completed. O. Reg. 345/15, s. 19.

156.5 (1) Before a drilling operation described in section 156.3 begins, the employer responsible for it shall,


- (a) develop a drilling procedure for the drill rig in accordance with subsection (2) and have it approved by a professional engineer; and
- (b) have a copy of the drilling procedure provided to, and reviewed with, the workers engaged in the drilling operation. O. Reg. 345/15, s. 19.

(2) The drilling procedure shall be in writing and shall include, at a minimum, details of,

- (a) the sequence of activities of the drilling operation to be followed including, if applicable, the delivery of concrete, rebar, steel piles and other materials related to the drilling operation;
- (b) the procedures to be implemented for removing excavated soil and material from an auger or drilling tool and away from the supporting surface of the drill rig;
- (c) the location to be used for storing excavated soil and material so that it does not endanger workers;
- (d) the working area and designated path of travel to be used for any machinery or equipment used in the vicinity of the drilling operation so that the machinery or equipment does not affect the stability and integrity of the supporting surface of the drill rig;
- (e) the measures and procedures to be implemented during the drilling operation to ensure that unremoved hazards do not endanger workers; and
- (f) the areas that have been designated at, or in the vicinity of, the drilling operation where,
 - (i) only persons authorized by the employer are allowed to enter, and
 - (ii) no persons or equipment are allowed to enter. O. Reg. 345/15, s. 19.

(3) While a rotary foundation drill rig is in service at a drilling operation described in section 156.3, the employer responsible for the drilling operation shall ensure that,

- (a) the drilling procedure described in subsection (2) is implemented; and

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(b) the drilling procedure is followed by the workers engaged in, and in the vicinity of, the drilling operation. O. Reg. 345/15, s. 19.

156.6 (1) An employer shall ensure that a worker who operates a rotary foundation drill rig,

- (a) is qualified in accordance with section 156.7;
- (b) has completed a training program that meets the requirements of section 156.9, or is participating in a training program that meets such requirements and is being instructed on the operation of the drill rig;
- (c) has demonstrated to the employer that the worker has adequate knowledge and proficiency in operating the drill rig to be used at the project; and
- (d) is authorized by the employer to operate the drill rig at the project. O. Reg. 345/15, s. 19.

(2) The employer shall maintain a record of the training program described in section 156.9 provided to the worker that includes,

- (a) the worker's name and the training dates; and
- (b) the name and signature of the training provider. O. Reg. 345/15, s. 19.

(3) The employer shall make the training record available to an inspector upon request. O. Reg. 345/15, s. 19.

156.7 (1) No worker shall operate a rotary foundation drill rig except in accordance with this section. O. Reg. 345/15, s. 19.

(2) The worker shall,

- (a) have completed a training program that meets the requirements of section 156.9 and have written proof of training available at the project to an inspector upon request; or
- (b) be participating in a training program that meets the requirements of section 156.9 and is being instructed on the operation of the drill rig. O. Reg. 345/15, s. 19.

(3) If a worker is operating a drill rig with an effective torque equal to or greater than 50 kilonewton metres, the worker shall have a certificate of qualification or written proof of training as required by section 156.8 available at the project to an inspector upon request. O. Reg. 345/15, s. 19.


156.8 (1) No worker shall operate a rotary foundation drill rig with an effective torque greater than 270 kilonewton metres unless the worker,

- (a) holds a certificate of qualification issued under the *Ontario College of Trades and Apprenticeship Act, 2009*, that is not suspended, in the trade of hoisting engineer – mobile crane operator 1; or
- (b) is an apprentice who is working pursuant to a training agreement registered under the *Ontario College of Trades and Apprenticeship Act, 2009*, that is not suspended, in the trade of hoisting engineer – mobile crane operator 1. O. Reg. 345/15, s. 19.

(2) No worker shall operate a rotary foundation drill rig with an effective torque greater than 190 kilonewton metres but less than or equal to 270 kilonewton metres unless the worker,

- (a) holds a certificate of qualification issued under the *Ontario College of Trades and Apprenticeship Act, 2009*, that is not suspended, in the trade of hoisting engineer – mobile crane operator 1, or hoisting engineer – mobile crane operator 2; or
- (b) is an apprentice who is working pursuant to a training agreement registered under the *Ontario College of Trades and Apprenticeship Act, 2009*, that is not suspended, in the trade of hoisting engineer – mobile crane operator 1, or hoisting engineer – mobile crane operator 2. O. Reg. 345/15, s. 19.

(3) No worker shall operate a rotary foundation drill rig with an effective torque equal to or greater than 50 kilonewton metres but less than or equal to 190 kilonewton metres unless the worker,

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- (a) holds a certificate of qualification issued under the *Ontario College of Trades and Apprenticeship Act, 2009*, that is not suspended, in the trade of hoisting engineer – mobile crane operator 1, or hoisting engineer – mobile crane operator 2;
- (b) is an apprentice who is working pursuant to a training agreement registered under the *Ontario College of Trades and Apprenticeship Act, 2009*, that is not suspended, in the trade of hoisting engineer – mobile crane operator 1, or hoisting engineer – mobile crane operator 2; or
- (c) has written proof that the worker has completed a training program on the operation of a 0-8 ton mobile crane that included instruction on,
 - (i) the relevant requirements of this Regulation,
 - (ii) how to use the manufacturer's operating manuals,
 - (iii) minimum distances when approaching an overhead electrical conductor,
 - (iv) communications and signals,
 - (v) types of mobile cranes and their components, including wire and synthetic rope, hydraulics, rigging and rigging hardware,
 - (vi) pre-operational inspections and checks, and
 - (vii) safe work practices related to mobile cranes, including crane set-up, load charts, assembly and disassembly of manual boom extensions, basic crane operation and maintenance. O. Reg. 345/15, s. 19.

156.9 A training program for the operation of a rotary foundation drill rig shall include instruction on,

- (a) the relevant requirements of this Regulation and the drill rig manufacturer's operating manual;
- (b) safe work practices;
- (c) communications and signals;
- (d) pre-operational inspections and checks;
- (e) site assessment;
- (f) drill rig set-up, securing and operation; and
- (g) equipment maintenance. O. Reg. 345/15, s. 19.

TOWER CRANES

157. (1) No tower crane shall be erected at a project except in accordance with this section. O. Reg. 213/91, s. 157 (1).


(2) The foundations supporting a tower crane shall be designed by a professional engineer in accordance with the crane manufacturer's specifications and shall be constructed in accordance with the design. O. Reg. 213/91, s. 157 (2).

(3) The shoring and bracing that support a tower crane or tie it in place shall be designed by a professional engineer in accordance with the crane manufacturer's specifications and shall be installed in accordance with the design. O. Reg. 213/91, s. 157 (3).

(4) The structural engineer responsible for the structural integrity of the building or structure shall review the design drawings for the foundation, shoring and bracing for a tower crane before the crane is erected at a project to ensure the structural integrity of the building or structure. O. Reg. 213/91, s. 157 (4).

(5) The structural engineer who reviews the design drawings shall sign the drawings upon approving them. O. Reg. 213/91, s. 157 (5).

(6) The constructor shall keep at the project while a tower crane is erected a copy of the signed design drawings for its foundation, shoring and bracing and any written opinion about the drawings by a structural engineer. O. Reg. 213/91, s. 157 (6).

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158. (1) Before a tower crane is erected at a project, a professional engineer shall ensure that the structural elements and components of the crane be subjected to non-destructive testing to ensure the structural integrity of the crane. O. Reg. 242/16, s. 16.

(2) The professional engineer conducting an inspection or under whose direction an inspection is done shall prepare a written report of the test results. O. Reg. 213/91, s. 158 (2); O. Reg. 85/04, s. 17.

(3) The constructor shall keep the report at the project while the crane is erected. O. Reg. 213/91, s. 158 (3).

159. (1) A professional engineer or a competent worker designated by a professional engineer shall visually inspect for defects the structural elements and components of a tower crane,

(a) after the crane is erected and before it is used; and

(b) after the inspection under clause (a), at intervals not greater than twelve months. O. Reg. 213/91, s. 159 (1).

(2) No tower crane shall be used until any defects found during an inspection are repaired in accordance with the instructions of the crane's manufacturer or a professional engineer. O. Reg. 213/91, s. 159 (2).

(3) A professional engineer or a competent worker designated by a professional engineer shall inspect a tower crane that has been repaired to ensure that the defects are corrected. O. Reg. 213/91, s. 159 (3).

(4) The professional engineer conducting an inspection or under whose direction the inspection is done shall prepare a written report of the test results. O. Reg. 213/91, s. 159 (4); O. Reg. 85/04, s. 18.

(5) The constructor shall keep the report at a project while the crane is erected. O. Reg. 213/91, s. 159 (5).

160. (1) A tower crane shall have automatic limit switches and automatic overload limit devices that prevent,

(a) overloading at relative radii;

(b) a load on the crane from reaching beyond the highest permissible position specified by the manufacturer; and

(c) the trolley from reaching beyond the permissible travel limit specified by the manufacturer. O. Reg. 213/91, s. 160 (1).

(2) In addition to automatic limit switches and overload limit devices, a tower crane shall have such other switches and devices as the manufacturer specifies. O. Reg. 213/91, s. 160 (2).

161. (1) A competent worker shall perform operational tests on a tower crane to ensure that its automatic limit switches and overload limit devices are installed and functioning in accordance with the manufacturer's specifications, if any. O. Reg. 213/91, s. 161 (1).

(2) Operational tests shall be done,

(a) after the tower crane is erected on the project and before it is used; and

(b) at one-week intervals after the test under clause (a) while the crane is erected on the project. O. Reg. 213/91, s. 161 (2).

(3) Overload limit devices for a tower crane shall be tested using test blocks designed for the purpose that have their weight clearly marked on them. O. Reg. 213/91, s. 161 (3).

(4) The test blocks shall be kept on the project while the crane is erected. O. Reg. 213/91, s. 161 (4).


162. (1) A tower crane boom shall be able to slew freely when the crane is unattended except when,

(a) the boom may collide with another crane, a structure or another object; or

(b) to slew freely would be contrary to the written procedures of the crane's manufacturer. O. Reg. 213/91, s. 162 (1).

(2) When a tower crane boom is not permitted to slew freely it shall be secured in accordance with the written procedures of the crane's manufacturer. O. Reg. 213/91, s. 162 (2).


163. (1) Subject to subsection (2), the operator's cabin of a tower crane shall be located on and attached to or positioned on the crane in accordance with the instructions of the crane's manufacturer for the specific model and configuration of the crane and in such a manner that in the event of a failure of the boom, the cabin will not be crushed against the mast. O. Reg. 213/91, s. 163 (1).

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- (2) The operator's cabin shall not be located on or attached to the boom unless,
- the cabin and its attachments have been specifically designed and fabricated for that purpose by the original manufacturer of the crane in accordance with good engineering practice;
 - the boom of the crane cannot affect or be affected by the operation of another crane or make contact with a structure or equipment;
 - the crane is not overlapped by any part of another crane;
 - because of specific site conditions, the location of the cabin on the boom provides greater visibility for the operator than does the manufacturer's standard cabin location;
 - the means of access to the cabin or other locations on the boom is by a catwalk constructed of skid resistant expanded metal or similar material and fitted with solidly constructed guardrails and devices which provide fall protection for the operator;
 - the structural, environmental and ergonomic design of the cabin is equal to or greater than that of the crane's manufacturer's standard cabin design; and
 - the proposed location and attachment method provide a structural and mechanical safety factor equal to or greater than that of a cabin located on the crane mast or attached to the slewing ring. O. Reg. 213/91, s. 163 (2).
- (3) If the crane manufacturer specifies the location of the operator's cabin to be on the boom of a tower crane, the crane manufacturer shall provide to the owner of the crane a report for the specific model and specific configuration of crane on a project. O. Reg. 213/91, s. 163 (3).
- (4) The crane manufacturer's report shall include,
- the crane load restrictions, reductions or modifications resulting from the effect of the cabin weight and its offset from the boom centreline;
 - the crane configuration and operating restrictions resulting from the effect of the cabin location and attachment method; and
 - engineering design drawings that include,
 - the structural and ergonomic design of the cabin,
 - the location of the cabin on the boom,
 - the attachment method including all fittings and hardware, and
 - all means of access. O. Reg. 213/91, s. 163 (4).
- 164.** A load block of an unattended tower crane shall be left empty, at the top position and located at minimum radius. O. Reg. 213/91, s. 164.
- 165.** (1) The track bed of a rail-mounted tower crane shall have a sound and rigid base capable of carrying all loads to which it is likely to be subjected without deformation or settlement which affects the stability of the crane. O. Reg. 213/91, s. 165 (1).
- (2) The undercarriage of a rail-mounted tower crane shall be fitted with rail clamps that can be firmly attached to the rails to lock the crane in position. O. Reg. 213/91, s. 165 (2).
- (3) A rail-mounted tower crane shall be locked in position on the rails when not in use. O. Reg. 213/91, s. 165 (3).
- (4) A rail-mounted tower crane shall have rail stops or bumpers that extend at least as high as the centre of the undercarriage wheels and that are securely attached to the rail at both ends. O. Reg. 213/91, s. 165 (4).

DERRICKS, STIFF-LEG DERRICKS AND SIMILAR HOISTING DEVICES

166. (1) No derrick, stiff-leg derrick or similar hoisting device shall be attached to a building or structure unless this section is complied with. O. Reg. 213/91, s. 166 (1).

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(2) A professional engineer shall prepare design drawings and specifications for the attachment of a derrick, stiff-leg derrick or similar hoisting device to a building or structure. O. Reg. 213/91, s. 166 (2).

(3) The design drawings and specifications shall include,

- (a) the location of the derrick, stiff-leg derrick or similar hoisting device on the building or structure;
- (b) the location of anchor bolts, guy wires, supports and shoring for it;
- (c) particulars of the weight of the loads and the radius at which the loads are to be lifted; and
- (d) particulars of the loads and forces on the building or structure imposed by the derrick, stiff-leg derrick or similar hoisting device. O. Reg. 213/91, s. 166 (3).

(4) The constructor shall ensure that the structural engineer responsible for the structural integrity of a building or structure reviews and approves in writing the design drawings and specifications for a derrick, stiff-leg derrick or similar hoisting device before it is installed. O. Reg. 213/91, s. 166 (4).

(5) A professional engineer shall inspect a derrick, stiff-leg derrick or similar hoisting device before it is first used on a building or structure to ensure that it is installed in accordance with the design drawings and specifications. O. Reg. 213/91, s. 166 (5).

(6) The professional engineer conducting the inspection shall prepare a written report of the inspection. O. Reg. 213/91, s. 166 (6); O. Reg. 85/04, s. 19.

(7) The constructor shall keep a copy of the design drawings and specifications for a derrick, stiff-leg derrick or similar hoisting device and the report prepared under subsection (6) at a project while the derrick, stiff-leg derrick or similar hoisting device is on the project. O. Reg. 213/91, s. 166 (7).

167. (1) The pilot of a helicopter that is hoisting materials shall be competent to fly an externally-loaded helicopter. O. Reg. 213/91, s. 167 (1).

(2) The pilot shall be in charge of the hoisting operation and shall determine the size and weight of loads to be hoisted and the method by which they are attached to the helicopter. O. Reg. 213/91, s. 167 (2).

(3) Ground personnel including signallers for a helicopter being used to hoist materials shall be competent workers. O. Reg. 213/91, s. 167 (3).

(4) The constructor shall take precautions against hazards caused by helicopter rotor downwash. O. Reg. 213/91, s. 167 (4).


CABLES, SLINGS, RIGGING

168. (1) A cable used by a crane or similar hoisting device,


- (a) shall be steel wire rope of the type, size, grade and construction recommended by the manufacturer of the crane or similar hoisting device;
- (b) shall be compatible with the sheaves and the drum of the crane or similar hoisting device;
- (c) shall be lubricated to prevent corrosion and wear;
- (d) shall not be spliced; and
- (e) shall have its end connections securely fastened and shall be kept with at least three full turns on the drum. O. Reg. 213/91, s. 168 (1).

(2) No cable used by a crane or similar hoisting device,

- (a) subject to subsection (3), shall contain six randomly-distributed wires that are broken in one rope lay or three or more wires that are broken in one strand in a rope lay;
- (b) shall be smaller than its nominal rope diameter by more than,
 - (i) one millimetre for a diameter up to and including nineteen millimetres,

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- (ii) two millimetres for a diameter greater than nineteen millimetres up to and including twenty-nine millimetres, and
- (iii) three millimetres for a diameter greater than twenty-nine millimetres;
- (c) shall be worn by more than one-third of the original diameter of its outside individual wires;
- (d) shall show evidence of kinking, bird-caging, corrosion or other damage resulting in distortion of the rope structure; or
- (e) shall show evidence of possible rope failure including rope damage caused by contact with electricity. O. Reg. 213/91, s. 168 (2).
- (3) No cable that is static or is used for pendants,
 - (a) shall contain three or more broken wires in one lay or in a section between end connectors; or
 - (b) shall have more than one broken wire at an end connector. O. Reg. 213/91, s. 168 (3).
- (4) Rotation-resistant wire rope shall not be used for a cable for boom hoist reeving and pendants. O. Reg. 213/91, s. 168 (4).
- (5) Rotation-resistant wire rope shall not be used where an inner wire or strand for a cable is damaged or broken. O. Reg. 213/91, s. 168 (5).
- 169.** A cable used by a crane or similar hoisting device shall be capable of supporting at least,
 - (a) three and one-half times the maximum load to which it is likely to be subjected if it is used on a device other than a tower crane and it winds on a drum or passes over a sheave;
 - (b) five times the maximum load to which it is likely to be subjected if it is used on a tower crane and it winds on a drum or passes over a sheave;
 - (c) three times the maximum load to which it is likely to be subjected if it is a pendant or is not subject to winding or bending; and
 - (d) ten times the maximum load to which it is likely to be subjected if the crane or similar hoisting device is used for supporting persons. O. Reg. 213/91, s. 169.
- 170.** (1) All cable used by a crane or similar hoisting device shall be visually inspected by a competent worker at least once a week when the crane or similar hoisting device is being used. O. Reg. 213/91, s. 170 (1).
- (2) The worker performing an inspection shall record the condition of the rope or cable inspected in the log book for the crane or similar hoisting device. O. Reg. 213/91, s. 170 (2).
- 171.** (1) A cable used by a crane or similar hoisting device shall be securely attached,
 - (a) by binding and fastening the cable around an oval thimble in a way that is strong enough to prevent the cable thimble from separating; or
 - (b) by fastening the cable within either a tapered socket by means of virgin zinc or a wedge-type socket fitted with a wire rope clip at the dead end to prevent the accidental release or loosening of the wedge. O. Reg. 213/91, s. 171 (1).
- (2) The dead end cable of a wedge socket assembly on a hoisting line shall extend between 100 millimetres and 300 millimetres out of the socket. O. Reg. 213/91, s. 171 (2).
- 172.** (1) A container, sling or similar device for rigging or hoisting an object, including its fittings and attachments,
 - (a) shall be suitable for its intended use;
 - (b) shall be suitable for and capable of supporting the object being rigged or hoisted;
 - (c) shall be so arranged as to prevent the object or any part of the object from slipping or falling;
 - (d) shall be capable of supporting at least five times the maximum load to which it may be subjected; and

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(e) shall be capable of supporting at least ten times the load to which it may be subjected if it is to be used to support a person. O. Reg. 213/91, s. 172 (1).

(2) A sling or similar device made of web-type fabric or nylon shall be labelled to indicate its load rating capacity. O. Reg. 213/91, s. 172 (2).

(3) No sling or similar device for rigging or hoisting made of web-type fabric or nylon shall be used if it may be cut. O. Reg. 213/91, s. 172 (3).

173. (1) Every hoisting hook shall be equipped with a safety catch. O. Reg. 213/91, s. 173 (1).

(2) No safety catch is required on a hoisting hook used in placing structural members if the method of placing protects workers to the same standard as a safety catch does. O. Reg. 213/91, s. 173 (2).

(3) A hoisting hook shall have its load rating legibly cast or stamped on it in a location where the person using the hook can readily see it. O. Reg. 213/91, s. 173 (3).

(4) A hoisting hook shall not be used if it is cracked, has a throat opening that is greater than as manufactured or is twisted from the plane of the unbent hook. O. Reg. 213/91, s. 173 (4).

174. A hook block shall have its load rating and weight legibly cast or stamped on it in a conspicuous location. O. Reg. 213/91, s. 174.

175. (1) An overhauling weight used on the cable of a crane or similar hoisting device,

(a) shall be prevented from sliding up or down the cable; and

(b) shall be securely attached to the load hook and the cable. O. Reg. 213/91, s. 175 (1).

(2) No overhauling weight used on the cable of a crane or similar hoisting device shall be split. O. Reg. 213/91, s. 175 (2).

176. (1) Only an alloy steel chain or a chain manufactured for the purpose shall be used for hoisting. O. Reg. 213/91, s. 176.

(2) No alloy steel chain shall be annealed or welded. O. Reg. 345/15, s. 20.

(3) A chain used for hoisting shall,

(a) be labelled to indicate its load rating capacity;

(b) be repaired and reconditioned in accordance with the specifications of its manufacturer;

(c) after being repaired or reconditioned, be proof tested in accordance with the specifications of its manufacturer; and

(d) be visually inspected by a competent worker as frequently as recommended by its manufacturer and, in any case, at least once a week when the chain is in service. O. Reg. 345/15, s. 20.

177. REVOKED: O. Reg. 345/15, s. 21.



178. A friction-type clamp used in hoisting materials shall be constructed so that an accidental slackening of the hoisting cable does not release the clamp. O. Reg. 213/91, s. 178.

179. (1) If a worker may be endangered by the rotation or uncontrolled motion of a load being hoisted by a crane or similar hoisting device, one or more guide ropes or tag lines shall be used to prevent the rotation or uncontrolled motion. O. Reg. 213/91, s. 179 (1).

(2) No guide rope or tag line shall be removed from a load referred to in subsection (1) until the load is landed and there is no danger of it tipping, collapsing or rolling. O. Reg. 213/91, s. 179 (2).

180. (1) Piles and sheet-piling shall be adequately supported to prevent their uncontrolled movement while they are being hoisted, placed, removed or withdrawn. O. Reg. 213/91, s. 180 (1).

(2) No worker shall be in an area where piles or sheet-piling are being hoisted, placed, removed or withdrawn unless the worker is directly engaged in the operation. O. Reg. 213/91, s. 180 (2).

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ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of effective Crane, Hoists & Rigging Procedures.
- Allocate appropriate resources, training, and workers to implement and maintain these procedures.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.
- Ensure that the policy elements have been communicated to all members of the Company.

Foremen/Supervisors/Managers/Superintendents will:

- Ensure that workers are following the procedures for cranes, hoisting and rigging.
- Ensure that all workers who use cranes and hoists and all workers who will be rigging a load are trained accordingly and are competent.
- Ensure that all areas under which a load may pass are clear of personnel.

Workers will:

- Wear all the appropriate PPE.
- Be aware of their surroundings when loads are being lifted or moved.
- Trained accordingly when directly involved with rigging or lifting loads.


COMMUNICATION

Communication of this program regarding the roles and responsibilities will be completed to the appropriate workers through any of the following forums:

- Annual Safety Day Training
- Third party training providers
- Safety communication board postings
- Toolbox talks

Records of communication will be recorded and stored using SiteDocs or other means when required.

Pre-lift communication meetings are to be held prior to any critical lift. Lift plans are to be developed to ensure for the safety of all workers in the proximity of the lift.

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TRAINING

- Crane training for crane operators
- Rigging training for riggers (may be part of trade courses such as millwrights)
- Basics of safety for workers in 4 steps or equivalent
- Basics of safety for supervisors in 5 steps or equivalent
- WHMIS
- Safe Work Procedure SWP Hoisting and Lifting

EVALUATION

This policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy		Dec 1, 2020	New
Update Policy	Annual Review	Jan 11, 2021	001
Update Policy	Annual Review	Jan 10, 2022	002
Update Policy	Annual Review	Jan 18, 2023	003
Update Policy	Annual Review	Jan 22, 2024	004
Replaced eCompliance with SiteDocs	Change of safety platform	Nov 14, 2024	005
Added reference to SWP – Hoisting and Lifting	Annua review	Feb 12, 2025	006

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POLICY STATEMENT

King Paving & Construction Ltd. is committed to promoting a cooperative, positive, and progressive approach to dealing with health and safety issues. The Joint Health & Safety Committee must be effective by representing all parties to incorporate the shared responsibilities under the Occupational Health and Safety Act.

The Joint Health & Safety Committee will assist in creating and developing a Health & Safety Program for all workers. The policy will outline the key roles and responsibilities on the Joint Health & Safety Committee, Worker Trades committees and Health & Safety representatives.

The Occupational Health and Safety Act is built upon the principle that workers and employers must work together to ensure a healthy and safe workplace environment that meets Provincial standards. The means by which this is achieved is through the work of the Joint Health & Safety Committee and Committee representatives.

The primary purpose and mission of the Joint Health & Safety Committee is to monitor, assist and support the Internal Responsibility System (IRS). This is best accomplished when the JHSC fulfills its essential role of identifying weaknesses in the Company's IRS and recommends solutions that enable all workplace parties to understand, accept, and carry out their individual and collective responsibilities for workplace health and safety.

SCOPE AND REGULATION

This policy applies to all members of the Joint Health & Safety Committee, Management, and workers.

Regulations for Joint Health & Safety Committees – Ontario

Occupational Health and Safety Act R.S.O. 1990, Chapter 0.1

DEFINITIONS


Internal Responsibility System (IRS) – The fundamental concept on which the Act is based. The IRS defines and outlines the responsibilities of all parties in the workplace. The development of an effective IRS is shared by all parties and contributes to the quality of occupational health and safety programming, its execution and the health and safety culture.

Joint Health & Safety Committee or JHSC – Is a committee made up of both Management and Worker representatives and is required at a workplace in which twenty or more workers are regularly employed.

Management Representative – Is a worker who exercises managerial functions that has been selected by Senior Management or that has volunteered to participate on the Joint Health & Safety Committee.

Shall – Means must, mandatory.

Worker – A person who performs work or supplies services for monetary compensation.

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Certification (Certified Members) – The MOL certifies members once they complete parts 1 and 2 of mandatory training; Basic Certification and Workplace-Specific Hazard Training.

- Part One: Basic Certification provides an overall knowledge of health and safety that applies to all workplaces.
- Part Two: Workplace-Specific Hazard Training focuses on significant hazards in your workplace. It covers how to assess those hazards and ways to control and/or eliminate them.

Worker Representative – Is a worker who represents workers and has been voted by his/her peers to participate on the JHSC.

Work Refusal – Is a situation where a worker refuses to complete work because he/she has reason to believe that his/her health and safety is at risk.

Acronyms:

- The ACT – Occupational Health and Safety Act
- JHSC – Joint Health & Safety Committee
- WSIB – Workplace Safety and Insurance Board
- IRS – Internal Responsibility System
- MOL – Ministry of Labour
- MOE – Ministry of Environment


COMPOSITION

The JHSC will consist of a minimum two worker members and two management members based on the size of the division.

- Names and work locations of the Joint Health & Safety Committee will be posted in conspicuous workplace locations.
- The number of Management members can never exceed the total number of workers at a meeting.

Current JHSC Members are:

Mathew Hutter	Construction Management Safety Rep, Certified Level 1&2 (Co-Chair)
Colin Frostad	Construction Worker Safety Rep
Jonathan Czata	Construction Worker Safety Rep
Mike Gzik	Management Rep, Head Office, Certified Level 1
Garron Bichon	Asphalt Plant Worker Rep
Sherry Hankinson	Safety Rep, Head Office, Certified Level 1 & 2

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SELECTION PROCESS

Selection Process for the Worker Member/Site Safety Rep

The worker member will be selected on a volunteer basis, or if more than one person volunteers, then an election will be held. On jobsites where a worker rep is required, the workers at that location will elect the person.

Replacement of a Worker Member

If a worker member is not able to continue carrying out their responsibilities, then a notice will be posted and a new representative voted upon based on the required composition of the committee or site requirements.

Selection of the Management Member

Management will appoint their representative on the committee.

Selection of Alternate Members

Management and worker alternate members will be selected based on the methods listed above.

Selection Process for Certified Members

The selection process for certified members is as follows:

- Workers will vote and select their certified representative.
- Management will vote and select their certified representative.

Replacement of Certified Members

The same process listed above will be used for the selection of certified members.


Selection of Co-Chairs

Worker committee members will select their co-chair to represent them. Management members of the committee will decide which member will become the management co-chair.

Failure to Select the Required Number of Members

If the JHSC is having difficulty selecting the required number of members, Management has a responsibility for the following:

- Discuss with all workers the importance of the committee.
- Ensure workers understand training will be provided.
- Provide information on the roles and responsibilities of the committee.

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RESPONSIBILITIES

Senior Management will:


- Assume ultimate responsibility for the development and implementation of an effective JHSC Program.
- Allocate appropriate resources, training, and workers to implement and maintain the JHSC Program.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct any identified deficiencies.
- Respond to written recommendations to the JHSC within 21 days. The response must include corrective action time and dates, or reasons for disagreement of recommendations.

Foremen/Supervisors/Managers/Superintendents will:

- Ensure the current Health & Safety Policy of King Paving & Construction Ltd. has been posted on all Health & Safety boards or in safety binders.
- Ensure compliance with all those who have a relationship with the organization.
- Provide assistance and co-operation to the JHSC to carry out its role.
- Respond to written recommendations to the JHSC within 21 days. The response must include corrective action time and dates, or reasons for disagreement of recommendations.
- Provide an assessment of all hazardous chemicals and physical agents found or used in the workplace and provide a copy of this assessment to the committee.
- Post the names and work locations of JHSC members in the workplace.
- Have awareness, understanding and acknowledgement of King Paving & Construction Ltd. JHSC Terms of Reference.
- Participate in investigations and site visits by MOL as required.

Workers will:

- Have awareness, understanding and acknowledgement of King Paving & Construction Ltd. JHSC Terms of Reference.
- Participate as or aid in the appointment of Health and Safety Representative.
- Have the ability to see monthly inspection reports posted and participate, when approved by Management, in a JHSC monthly inspection.
- Could attend a monthly meeting, when approved by Management, as a guest.
- Coordinate with Health & Safety Rep. or Committee Member should any results outlining concerns not be addressed by a management member in a timely manner.

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JHSC will:


- Be elected or appointed by workers or trade union.
- Hold or complete Ontario approved training for a certified Health & Safety Representative Certification.
- Participate in monthly inspections.
- Complete and maintain on file, recommendation form to Senior Management for response within 21 days of notification, when required.
- Attend scheduled meetings.
- Assist in investigations when required.
- Promote the Company Health & Safety Program.
- Participate in the Work Refusal Program, when required.
- Work together with workers, Health & Safety Department and Management to review the JHSC Program annually and make recommendations for continuous improvements.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained at the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the Policy requirements.
- Ensure that the requirements of the Program are embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Health & Safety Day, Toolbox Talks or onsite training.
- Ensure tracking of the safety data and prepare the monthly, quarterly and annual reports for the JHSC to review.
- Present the results to all levels of Management and the JHSC.
- Promote feedback and recommendations from workers.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of updated legislation regarding Occupational Health and Safety Act standards through industry education.
- Be responsible for updating the Policy on an annual basis with Senior Management and the JHSC.

PROCEDURES**Joint Health and Safety Committee (JHSC)****Terms of Reference****PREAMBLE**

King Paving & Construction Ltd. as an employer is responsible for establishing and maintaining a JHSC to deal with health and safety issues concerning workers in bargaining units and all workplace parties of the Company.

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King Paving & Construction Ltd. promotes the approach that through joint investigations of health and safety issues and joint resolution of these issues, the workplace will be co-operatively maintained in a safe and healthy condition.

King Paving & Construction Ltd. and its workers have acknowledged that the proper functioning of the JHSC can only be carried out where the representatives of the parties are committed to their responsibilities under the Ontario Occupational Health and Safety Act and have agreed to endeavor to promote a co-operative, positive and progressive effort concerning health and safety in the workplace.

The King Paving & Construction Ltd. JHSC has adopted these terms of reference to guide its operations, as outlined under the King Paving & Construction Ltd. JHSC Policy.

1.0 COMPOSITION OF THE COMMITTEE

Member Selection

1.1 There will be four worker members on the Committee. These worker members will be selected by their peers, Union(s) and other worker groups. LIUNA Local 837 Hamilton, LIUNA Local 183 Toronto, LIUNA Local 837 Hamilton, Teamsters Union Local 879 and Head Office Staff.

1.2 The Union and other worker groups may also select one alternate worker members for the purpose of attending Committee meetings if a worker member cannot attend the meeting.

1.3 There will be two members on the Committee selected by the Senior Management from among persons who exercise managerial functions. Senior Management may also select one alternate member from among persons who exercise managerial functions.

1.4 When the number of worker members does not meet the requirements set out in the above terms of reference all workplace parties will work towards finding worker members to volunteer. This will be done with the understanding that the union(s) has the duty to name worker members to the JHSC under the Act.


1.5 When the number of management members does not meet the requirements set out in the above terms of reference, Senior Management will appoint another member.

Co-Chairpersons

1.6 There will be two co-chairpersons ("co-chairs") of the Committee, one co-chair to be selected by the worker members of the Committee and once co-chair to be selected by the management members of the Committee.

Certified Members

1.7 There will be at least two certified members, one who represents the workers, and one who represents Management. The Union(s) being represented by the committee will select the worker member(s) to be certified. The Senior Management shall select the management member to be certified.

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Should a certified member leave the committee, another member of that committee will be designated for certification by the appropriate workplace parties.

Guests

1.8 Additional persons may attend Committee meetings with the approval of both co-chairs.

2.0 FUNCTIONS OF THE COMMITTEE

General

2.1 It is the function of the Committee to:

- Identify, evaluate, and make recommendations concerning workplace health and safety issues
- Inspect the workplace on a regular basis
- Be consulted about and provide input into workplace health and safety programs; and
- Discuss other workplace health and safety issues and reports as appropriate.

Inspections

2.2 The worker membership will designate one or more worker members to conduct workplace inspections. With the agreement of the worker members, management members may accompany the worker members on the inspection.


2.3 Committee members will inspect designated jobsites and head office to be determined by an annual inspection schedule to be prepared by the Committee.

2.4 The Committee will prepare and adopt inspection forms (sample forms are located on SiteDocs named (Joint Health and Safety Committee Site Inspections). All Committee members conducting inspections will digitally sign the inspection forms upon completion of the inspection. Completed inspection forms will be available to view on SiteDocs for the supervisor and the co-chairs. A hard copy will be provided to the co-chairs if the form cannot be viewed digitally within (designate time frame, e.g. 3 working days) days of the completion of an inspection. The appropriate foreman will provide a written response to the identified hazards to the committee co-chairs before the next scheduled Committee meeting.

Recommendations of the Committee

2.5 The Committee shall forward in writing any recommendations to Senior Management for review. Recommendations are made to improve the Internal Responsibility System as well as Health and Safety at King Paving & Construction Ltd. The Senior Management will provide a written response to Committee recommendations (in accordance with section 9(20) and 9(21) of the Act) to the co-chairs within 21 calendar days after receipt of the written recommendations. This response shall include a timetable for implementing the recommendations the Senior Management agrees with, and the reasons for disagreement with any recommendations not accepted.

Accident Investigations

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2.6 The Employer will provide lost time/medical aid information to the co-chair on a regular basis and upon request.

2.7 Where a worker is killed or critically injured on the job, the worker members of the committee shall designate one or more such members to investigate the accident and inspect the place where the accident occurred. The findings of the investigation shall be provided to the Committee, the appropriate management representative, the unions represented on the Committee, Health & Safety Department, and the Ministry of Labour (when required).

Ministry of Labour Inspections

2.8 A designated JHSC worker member and management member are to be notified and accompany any Ministry of Labour inspector conducting inspections in the workplace. The Health and Safety Department shall also be notified and will accompany the inspector during the inspection of the workplace when available to do so.

Work Refusals and Work Stoppages

2.9 A designated worker member will be notified and attend a work refusal or stoppage without delay. The Health and Safety Department shall also be notified and will attend the work refusal as per the Work Refusal Procedure.

3.0 MEETINGS

Frequency

3.1 Committee meetings will be scheduled (e.g. monthly, quarterly) at a predetermined time and location. Changes to the meeting schedule may take place with the agreement of the committee co-chairs, provided that the period between any two committee meetings does not exceed three months.

Co-Chair

3.2 The worker co-chair and the management co-chair may alternate duties as chairperson.


Quorum

3.3 A quorum for Committee meetings will consist of 50 percent plus one of Committee members, with both worker and Management representation and at least one co-chair present. The number of management members must not exceed the number of worker members.

Guests do not count towards the determination of the quorum. If a quorum is not reached, the items discussed at the meeting will be for information purposes and will not include the passing of recommendations or approvals.

Agenda Items

3.4 The co-chairs will prepare a copy of the agenda for each meeting and distribute it to all members one week in advance of regularly scheduled Committee meetings.

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3.5 Agenda items will consist of workplace health and safety issues. Agenda items should be dealt with by consensus. Where consensus is not reached, this will be recorded in the minutes.

Minutes

3.6 Senior Management for the JHSC will provide clerical assistance with respect to the recording, preparation and timely circulation of the agenda and minutes of Committee meetings.

3.7 Minutes of Committee meetings are to be prepared in a timely fashion, reviewed and signed by both co-chairs prior to circulation and posting. The co-chairs and supervisors are responsible for ensuring that signed Committee minutes are promptly posted on the relevant health and safety boards in the workplace in a visible location.

3.8 The Foreman, JHSC members or Superintendent shall be responsible to discuss the minutes at the next scheduled JHA meeting immediately after the minutes have been distributed to the office and field locations.

4.0 PAYMENT FOR COMMITTEE MEMBERS

4.1 In accordance with the requirements of the Act, all time spent by Committee members in connection with attending at Committee meetings or performing duties prescribed by the Occupational Health and Safety Act or these terms of reference will be considered as time at work for which Committee members will be paid at the appropriate rate of pay.

5.0 GENERAL

5.1 It is agreed that workers are to be encouraged to report health and safety concerns to their immediate supervisor before bringing it to a committee member. The Occupational Health and Safety Act requires that all workers report any workplace hazard or contravention of the legislation to their supervisor.

5.2 It is understood and agreed that all personal medical information is to be kept confidential. Any references to such information in Committee minutes must be done in a manner that prevents any identification of an individual's personal or medical information.


5.3 Committee members are to be provided one hour or such longer period of time as the Committee determines it necessary, to prepare for each Committee meeting.

The Committee may amend these terms of reference at any time, as deemed necessary to facilitate the ongoing effective operation of the Committee.

TRAINING/RECORD KEEPING

Training records shall be maintained by the Health & Safety Department.

Annual toolbox talks will be issued as part of the ongoing program awareness.

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Joint Health & Safety Committee certification must be completed through a recognized training provider. All committee members will have Level 1 JHSC certification. Level 2 certification will be assigned to those designate worker and Management reps.

All members of the JHSC will complete the refresher course as required in the province of Ontario.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual Health & Safety Day

Records of communication will be recorded and stored using SiteDocs or other means when required.

APPLICABLE FORMS

HSMS 13-15 JHSC Meeting Agenda

JHSC Meeting Minutes (HSF 8.02)

JHSC Recommendation Form (HSF 8.3)

JHSC Committee Member List


JHSC Site Inspection Form (HSF 9.2)

Work Refusal Procedure

Subcontractor Package

Incident Report – Injury, Theft, Damage, Utility Hit Form (HSF 10.2)

Incident Investigation Form (HSF 10.1)



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CONTINUOUS IMPROVEMENT AND EVALUATION

The policy for the Joint Health & Safety Committee Program will be reviewed annually jointly by Senior Management and the Joint Health & Safety Committee. Legislative and industry updates will be reviewed to ensure the JHSC Program meets the Occupational Health and Safety Act, and any other governing legislation that pertains to this program.

The amended policy shall be kept as a record of review and the required changes. The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Policy created	Policy development	Jan 31, 2016	000
Changes to the members of the JHSC	2 members no longer with the company	Jul 14, 2016	001
Terms of reference updated	Updated to meet the COR standard & the JHSC member list	Feb 21, 2018	002
Update policy	Annual review, company name change & JHSC member list	Oct 17, 2019	003
Update policy	Annual review	Feb 13, 2020	004
Update policy	Annual review & updated responsibilities	Jan 11, 2021	005
Update policy	Annual review	Feb 1, 2022	006
Update policy Removed Marco Misiti from the committee Minor format changes	Annual review	Jan 23, 2023	007
Update policy Minor format changes	Annual review	Jan 24, 2024	008
Replaced eCompliance with SiteDocs	Change in safety platform	Nov 14, 2024	009
Updated forms in reference section and added form numbers	Annual Review	Feb 12, 2025	010

Workplace Violence and Harassment Policy	Issue Date: January 23, 2018	
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Policy Number: HSMS 13-12	Revision Number: 008	
	 <i>Approved By: President</i>	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all employees, subcontractors, and visitors by ensuring everyone is treated with dignity and respect and has a work environment which is safe, productive, healthy, and free from harassment and violence.

This policy applies to all employees while in the workplace, or during any work-related and/or social functions. The Company is committed to familiarizing all workplace parties with the related terminology as well as their individual responsibilities for prevention and corrective action.

SCOPE AND REGULATION

This policy pertains to all levels of the organization, subcontractors, customers, and visitors while in the workplace, or during any work-related and/or social functions.

Project Site Specific Risk Assessments will be conducted at project start and reviewed at least on an annual basis.

The Occupational Health & Safety Act

The Criminal Code of Canada

The Ontario Human Rights Code

The Workplace Safety and Insurance Act

The Compensation for Victims of Crime Act


DEFINITIONS

For this policy, the following definitions will be used:

Company – Means the company to whom the subcontractor is providing services to King Paving & Construction Ltd.

Workplace Harassment –

- Engaging in a course of hurtful (vexatious) comment or conduct against a worker in a workplace that is known or ought to be reasonably known to be unwelcome. May include bullying, intimidating or offensive jokes or innuendos, displaying or circulating offensive pictures or materials, or offensive or intimidating phone calls; or
- Workplace sexual harassment:
 - Engaging in a course of hurtful (vexatious) comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought to be reasonably known to be unwelcome, or

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- Making a sexual solicitation or advance where the person making the solicitation or advance can confer, grant or deny a benefit or advancement to the worker and the person knows or ought to reasonably know that solicitation or advance is unwelcome.

Workplace Violence –

- The exercise of physical force or an attempt to exercise physical force by a person against a worker in the workplace, that causes or could cause physical injury to the worker.
- A statement or behavior that is reasonable for a worker to interpret as a threat to exercise physical force against the worker in a workplace, which could cause physical injury to the worker.

Complainant – The person who has made a complaint about another individual whom they believe committed an act of violence or harassment against them.

Respondent – The person whom another individual has accused of committing an act of violence or harassment.


Physical Assault – Is any physical force or threat of physical force to create fear and control over another person. Some examples include hitting, blocking, shoving, choking, slapping, biting, or pulling hair, caring for a victim in an abusive way, threats of violence and using a weapon or other objects to threaten, hurt or kill.

Sexual Harassment – Is often interpreted as objectionable comments or conduct of a “sexual nature”. However sexual harassment in the broader context of unequal treatment based on gender, may refer to instances where the behavior is not overly sexual in nature, but is related to the person’s gender, and demeans or causes personal humiliation or embarrassment to the recipient. Examples include degrading words, rude jokes or sexual comments, name calling (such as bitch, chick, etc.), physical contact, sexual demands, unwanted kissing or touching of a sexual nature, and insulting remarks about the person’s sexual orientation, race, culture, ability and/or income.

Sexual Assault – Is any unwanted sexual act done by one person to another. Examples include kissing or forcing/coercing the person into kissing, touching the person’s body with or without clothing on, removing or attempting to remove clothing, taking advantage of a position, trust or authority to get sex, and threatening to harm someone else if the person does not agree to do any of these things.

Threat (Verbal or Written) – Is a communicated intent to inflict physical or other harm on any person or to property by some unlawful act. A direct threat is a clear and explicit communication distinctly indicating that the potential offender intends to do harm, for example “I am going to make you pay for what you did to me”. A conditional threat involves a condition, for example “If you don’t leave me alone you will regret it.” Veiled threats usually involve body language or behaviours that leave little doubt in the mind of the victim that the perpetrators intend to harm.

Verbal/Emotional/Psychological Abuse – Is a pattern of behavior that makes someone feel worthless, flawed, unloved, or endangered. Like other forms of abuse, it is based on power and control. Examples include swearing, put-downs, name calling over a period of time, labelling the victim in a derogatory way (such as: stupid, crazy,

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or irrational), acts of humiliation, extreme jealous behavior, attacking the victim's self-esteem in other ways. It can also include harming pets and damaging property.

Workplace Bullying – Repeated and persistent negative acts towards one or more individuals, which involve a perceived power imbalance and create a hostile work environment.

PROCEDURES

Reporting and Investigation

When witnessing or experiencing an incident of workplace harassment, sexual harassment, or violence, employees have a responsibility to:

- In the case of workplace violence call 911 if the situation warrants it and you find a co-worker or yourself in immediate danger.
- In the case of workplace harassment, if appropriate make the objection clearly known to the offender and ask the individual to stop the behaviour.
- Inform your manager (or another manager if your manager is involved) immediately of any incident.
- A written record of the incident should be provided to Payroll including the dates, times, witnesses (if any) and description of the incident.

Filing a Report of Violence or Harassment

All incidents of harassment and/or violence must be reported to Senior Management.


When filing a formal report of the incident, the following should be noted:

- Specific details of the incident.
- The nature of the violent or harassing act.
- The names of any person(s) who may have witnessed the incident.

Reported incidents will be treated as confidentially as possible. To properly investigate the incident and offer adequate support to those involved, complete confidentiality cannot be guaranteed. Disclosure may be necessary in conducting the investigation or required by law.

Investigation Process

- Upon notification of a complaint of workplace harassment, sexual harassment, or violence, a thorough investigation will be completed.
- Management will appoint two co-investigators who will interview all individuals involved and record their statements. The investigators are to be unbiased and not have any form of authority over either the respondent or the complainant.
- The investigation process will include:
 - Informing the local Joint Health & Safety Committee of the complaint
 - Informing the respondent of the complaint

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- Interviewing the respondent, complainant, any person involved in the incident, any person who may have knowledge of the incidents or similar incidents, and any identified witnesses.
- A copy of the complaint, detailing the complainant's allegations, is then provided to the respondent.
 - The respondent is invited to reply in writing to the complainant's allegations, and the reply will be made known to the complainant before the investigation proceeds further.
 - If necessary, the Company may employ outside assistance or request the use of legal counsel.
 - The complainant and/or respondent reserves the right to seek legal counsel and to have a representative of their choosing to aid in the process.
 - Upon completion of the investigation, the investigator will present a report to management who will decide upon the appropriate action to be taken.
 - The Company will inform both the complainant, the respondent, and the local Joint Health and Safety Committee in writing of the findings of the investigation and any corrective action that has been or will be taken as a result of the investigation.

If the complainant decides not to lay a formal complaint, Senior Management may decide that a formal complaint is required (based on the investigation of the incident) and will file such documents with the person against whom the complaint is laid (the respondent).

If it is determined that harassment in any form has occurred, appropriate disciplinary measures will be taken as soon as possible.

Fraudulent or Malicious Complaints

This Workplace Violence and Harassment Policy must never be used to bring fraudulent or malicious complaints against employees. It is important to realize that unfounded or frivolous allegations of person harassment may cause both the accused person and the Company significant damage.

If it is determined by the company that any employee has knowingly made false statements regarding an allegation of person harassment, immediate disciplinary action will be taken.


Disciplinary Action

Any employee found to have engaged in conduct that violates this policy will be subject to disciplinary action that may include reprimand, suspension, or dismissal.

Confidentiality

All incidents reported will be handled discreetly and sensitively. The Company will do everything it can to protect the privacy of the individuals involved and to ensure that complainants and respondents are treated fairly and respectfully.

This privacy will be protected so long as doing so remains consistent with the enforcement of this policy and adherence to the law. Neither the name of the person reporting the facts nor the circumstances surrounding them will be disclosed to anyone whatsoever unless such a disclosure is necessary for an investigation or disciplinary action.

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Reprisals

All individuals involved in the processing of a complaint will ensure that the complainant is neither penalized nor subjected to reprisals because of making the complaint. Disciplinary action will be taken against any person who takes any reprisal against a person who reports workplace harassment, sexual harassment, or violence.

Emergency Response Measures

Management will respond promptly, assess the situation, and ensure that these interventions are followed:

- Facilitation of medical attention
- Debriefing by skilled professionals
- Referral to community agencies, treating practitioners and employee assistance program
- Referral to trade union
- Completion of incident report, Workplace Safety and Insurance Board reports, reports to Ministry of Labour (critical injury or fatality)
- Reporting to the police
- Team debriefing

Risk Assessment

Management (with worker involvement) will complete an annual workplace violence hazard assessment in the field and office environment. The review will cover new jobsites as well as existing and office workplaces.


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Workplace Violence and Harassment Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Workplace Violence and Harassment Program.
- Review the policy at least annually and approve all revisions. A signature is required on the policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure compliance with all those who have a relationship with the organization.

Foremen/Supervisors/Managers/Superintendents will:

- Be knowledgeable in the Workplace Violence and Harassment Program.
- Enforce the policy and procedures and monitor for compliance.
- Work together with the Health & Safety Department when a complaint has been made.
- Complete all incidents reporting requirements as per company guidelines on SiteDocs.

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- Contact the Health & Safety Department immediately to report a death or critical injury. The Health & Safety Department may contact the Ministry of Labour, Police, Joint Health & Safety Committee certified members, and trade union representatives.
- Post the company Workplace Violence and Harassment statement on all job sites.
- Facilitate medical attention as required.
- Participate in the investigations with the JHSC when required.
- Preserve the scene as required for investigation purposes.
- Communicate the policy to the workers as required.

Workers will:


- Participate in education and training programs to respond in a suitable manner to any incident of workplace violence and harassment.
- Understand and comply with the violence and harassment prevention policies and related procedures.
- Report all incidents or injuries of violence/harassment to your supervisor immediately. Complete the report with the Health & Safety Department and/or the JHSC.
- Inform the Joint Health & Safety Committee management or worker member about your concerns regarding potential for violence/harassment in the workplace.
- Seek support when confronted with violence/harassment or threats of violence.
- Get medical attention when required.
- At least annually participate in the assessment of workplace violence and harassment survey completed by the company.
- Participate in the review of the workplace violence and harassment prevention program.

Subcontractors will:

- Develop a workplace violence and harassment program and train their employees.
- Provide training records as requested.
- Participate in any investigations related to workplace violence and harassment complaints involving any employees that occur in the workplace or company sponsored event.
- Participate in the onsite Job Hazard Analysis and toolbox talks with regards to workplace violence and harassment program.
- Report all incidents or injuries of violence/harassment or threats of violence/harassment to your supervisor immediately. Complete the report with the Health & Safety Department.

Joint Health & Safety Committee members will:

- Work together with employees, Health & Safety Department and Management to review the Workplace Violence and Harassment Program annually and make recommendations for continuous improvements.
- Re-enforce compliance of the Workplace Violence and Harassment Program in the workplace.
- At least annually, participate in the workplace violence and harassment assessment.

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- Review the annual workplace violence and harassment survey results and make recommendations for improvement.
- Certified members participate in investigations when required.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained at the job sites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the program are embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through any of the following: Safety Day, Toolbox Talks or onsite training.
- Ensure tracking of the safety data and prepare the quarterly and annual reports for review.
- Present the results to all levels of management and the Joint Health & Safety Committee.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to Occupational Health and Safety Act standards through industry education.
- Maintain the safety data requirements with third party prequalification companies such as Comply works, Contractor check and ISNetwork.
- Be responsible for updating the policy on an annual basis with Senior Management and the Joint Health & Safety Committee.

TRAINING/RECORD KEEPING


Training for all workers will be completed at least every three years. All new hires will complete the training during the new hire orientation process.

Training records shall be maintained for workers who complete Workplace Violence and Harassment training.

The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

Training records shall be maintained by the Health & Safety Department.

Annual toolbox talks will be issued as part of the ongoing program awareness.

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COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

Workplace Violence and Harassment Reporting Form

HSMS 13-13 Workplace Violence and Harassment Policy Statement

KING Site Specific Risk Assessment

Ontario Human Rights

Occupational Health and Safety Act R.S.O. c.O.1 Part iii Violence and Harassment



CONTINUOUS IMPROVEMENT

The policy for the Workplace Violence and Harassment Program will be reviewed annually jointly by Senior Management and Joint Health & Safety Committee.

Legislative and industry updates will be reviewed to ensure the Workplace Violence and Harassment Program meets the Occupational Health and Safety Act, and any other governing legislation that pertains to this program.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Management Review	Issue Date: January 23, 2018	
	Revision Date: February 13, 2025	
Policy Number: HSMS 14-01	Revision Number: 009	
	 <i>Approved By: President</i>	

POLICY STATEMENT

The senior management at King Paving & Construction Ltd. is committed to regular review of the Occupational Health & Safety Program. Management Review will be conducted regularly during management safety meetings for all aspects of the health & safety program including policies, procedures, and recorded safety performance indicators. Senior management is also committed to an annual review of the Occupational Health & Safety Management System to ensure its continuing suitability, adequacy, and effectiveness with the key purpose of ensuring its continual improvement.

The information will be tracked and reviewed for many different functions such as budgeting, performance management, compliance with the Occupational Health and Safety Act, WSIB claims management, establishing Company Health and Safety performance goals, ongoing compliance with industry construction standards, developing a continuous improvement plan and the accreditation of the standard for the COR Program.

SCOPE AND REGULATIONS

This policy pertains to all Senior Management, Project Managers, Superintendents, and Foremen, Workers and the Health & Safety Department who are involved in the implementation and daily management of the Health & Safety Program. This policy works in conjunction with HSMS 13-01 – Legislation which identifies all applicable legislation that applies to our scope of work, and HSMS 14-02 Management Review Procedure.

DEFINITIONS

For this policy, the following definitions will be used.


Company – Means the company to whom the subcontractor is providing services for (e.g., King Paving & Construction Ltd.).

COR Program – Is awarded to employers who develop health and safety programs that meet established standards. A COR shows that the employer's health and safety management system has been evaluated by a certified auditor and meets provincial standards.

Action Plan – A sequence of steps that must be taken, or activities that must be performed well, for a strategy to succeed.

Internal Auditor – Is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. Professionals called internal auditors are employed by organizations to perform the internal auditing activity.

Continuous Improvement Plan – A continual improvement process, also often called a continuous improvement process (abbreviated as CIP or CI), is an ongoing effort to improve products, services, or processes. These efforts can seek "incremental" improvement over time or "breakthrough" improvement all at once.

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Safety Goals – Occupational Health and Safety objectives may be broken down into separate goals, depending on the size of the organization, the complexity of the OH&S objective and its timescale. There should be clear links between the various levels of goals and OH&S objectives. OH&S objectives and targets should be “S M A R T”, i.e., simple, measurable, achievable, relevant, and time bound.


Due Diligence – Applied to occupational health and safety, due diligence means that employers shall take all reasonable precautions, under the circumstances, to prevent injuries or accidents in the workplace.

Bill C45 – The Westray Bill or Bill C-45 was federal legislation that amended the Canadian Criminal Code and became law on March 31, 2004. The Bill (introduced in 2003) established new legal duties for workplace health and safety and imposed serious penalties for violations that result in injuries or death.

Management – The organization and coordination of the activities of a business to achieve defined objectives.

REQUIRED RESOURCES:


- Access to all health and safety department reports such as JHSC meetings, quarterly senior management safety review meetings, action plan updates, etc.
- The action plan for the current year and previous year
- Statistical Trend Analysis documents for the current and previous year
- WSIB reports
- First aid reports
- Near miss reports
- Incident reports
- Investigation reports
- Training reports (matrix)
- Site inspection reports from foremen, superintendents, senior management, JHSC, and the health and safety officer
- Risk Assessments
- Access to superintendent logs
- MLITSD field visit reports and orders
- Previous COR audits and action plans
- SiteDocs Analytics
- Worker recommendations
- Safety Recognition forms
- Feedback from the IHSA

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REQUIREMENTS

As per COR element 14 Management Review, King Paving & Construction has the following requirements:

- a) The roles and responsibilities pertaining to the Management Review are listed in the Responsibilities section of this procedure.
- b) The following are inputs for the senior management review:
 - i) **Evaluation of the effectiveness of all elements of the Occupational Health and Safety Management System.** The health & safety department will analyze the results of inspections, action items, first aid reports, near miss and incident reports, investigations, and input from the worker participation program to evaluate the effectiveness of the health and safety management system. In addition, COR audits are conducted annually as per HSMS 14-03 (Health and Safety Audit) which will generate an in-depth report based on our score achieved using the COR 2020 Audit Tool. A corrective action report will also be developed, reviewed and authorized by senior management. As per HSMS 14-02 Management Review Procedure, and HSMS 12-01 Statistics and Records, the corrective action report along with the documents and records mentioned above will be reviewed and updated during the quarterly JHSC meetings and the Quarterly Senior Management Safety review meetings, thereby evaluating the effectiveness of all elements (including COR) as to their effectiveness and allowing for recommendations for improvement(s). In addition, progress regarding the established health and safety objectives (Company Goals) will be measured and reviewed.
 - ii) **The status of actions taken from previous management reviews.** During the quarterly JHSC and Senior Management Review meetings, the status of actions taken will be reviewed and updated using the corrective action plans and action items listed on inspection and investigation reports. The status of actions taken will also be reviewed and discussed during the weekly superintendent's meetings. Action items pertaining to preventative and corrective measures are listed on the SiteDocs reports (inspections, investigations, incident and near miss reports and status of company safety goals). The action items are assigned to the appropriate personnel who will accept the action item, formulate and implement and follow up on the item. These changes and updates are tracked on SiteDocs and reviewed by the health & safety department, JHSC and senior management team during the quarterly meetings.
 - iii) **The results of internal audits including COR audits.** In October of each year, an internal COR audit will be conducted by the trained and authorized COR auditor, and every 3 years, an external audit will also take place using a COR auditor who has been trained, authorized and approved by the IHSA. The audit will be conducted in accordance with HSMS 14-03 (Health and Safety Audit). Following the audit, a closing meeting will take place which will communicate the results of the audit to senior management and introduce an action plan based on non-conformities and/or opportunities for improvements. The action plan will be reviewed and authorized by senior management and signed off by the president of the company. The results of the COR audit and pertinent sections of the action plan will be communicated to all personnel during weekly toolbox talks and further discussed during the health and safety day held in March of each year.


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- iv) **An evaluation of compliance with legal requirements will take place during the weekly superintendent's meetings and quarterly JHSC and Senior Management Safety Review Meetings.** The evaluation will include any non-compliance issues, the status of actions taken and their effectiveness. All health and safety policies, procedures and practices are reviewed and updated during the first quarter of each year. During the annual reviews and updates, each policy, procedure or practice will be revised as necessary to ensure compliance with applicable legislation, regulations, standards and recommendations that apply to the tasks.
- v) **The results of participation and consultation with employees, health and safety representatives and the joint health and safety committee are logged during JHSC, Superintendent and Senior Management meetings.** Information gathered from the worker participation program, safety recognition program, inspections and investigations are reviewed at least quarterly by the JHSC, and senior management and preventative or preventative measures may be formulated because of worker, JHSC or supervisor recommendations.
- vi) **Communication from external parties is documented by superintendents in their daily logbooks and pertinent information is reviewed during the weekly superintendent's meetings.** If there are any special safety requirements, the health and safety department will be consulted. Additional communication from external parties also takes place during pre-qualifications and specific job specifications through the estimators and senior project manager.
- vii) **Occupational health and safety performance of the company is measured and analyzed by the safety department and is reviewed with the JHSC and senior management during the quarterly meetings.** Refer to HSMS 12-01 Statistics and Records, HSMS 14-02 Management Review, and HSMS 14-03 Health and Safety Audit for specific procedures regarding measuring and analyzing occupational health and safety performance.
- viii) **Evaluation of the extent to which occupational health and safety objectives have been met will take place during the quarterly JHSC and senior management meetings.** Items such as resolved action items, corrective and preventative measures, action plan progress and the status of company safety goals will be evaluated by the safety department and reviewed with the JHSC and senior management. If an occupational health and safety objective is in jeopardy of not being met, a new action plan will be created and communicated to pertinent personnel.
- ix) **The status of incident investigations, trends identified, implementation of corrective actions, implementation of preventative actions and the status of actions taken will be measured and analyzed by the health & safety department.** The information gathered by the safety department will be communicated to the JHSC and senior management during the quarterly meetings.
- x) **Changing circumstances related to occupational health and safety** such as developments in legal requirements or technology will be identified by the safety department and reviewed with senior management in accordance with HSMS 13-01 (Legislation) and HSMS 14-04 (Management of Change).
- xi) **Identification of barriers to worker participation in the occupational health and safety management system will be analyzed by the safety department and solutions put forth to the JHSC and senior management.** The safety department will develop an action plan (currently

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titled Identification and Removal of Barriers to Worker Participation), which will identify potential barriers and formulate measures to remove them. This plan will be reviewed by the president of the company on an annual basis.

- xii) **Recommendations for improvement will be made by the safety department, safety representatives, supervisors and workers via inspection reports, incident and near miss reports, incident investigation, emergency preparedness drills, and through the worker safety recognition program.** Any recommendations made will be reviewed by the JHSC and senior management during the quarterly meetings and will be added to the action plan if the recommendation is feasible and has been accepted and authorized by senior management.
- c) The following outputs to the senior management review:
 - i) **Occupational Health and safety policy updates.** Any significant revisions or updates to health and safety policies, procedures or practices will be reviewed by senior management, authorized and signed off. New policies and procedures, or existing policies and procedures which have had significant revision will be reviewed by the JHSC during the quarterly meetings.
 - ii) **Measurable health and safety objectives are developed by the safety department in consultation with the JHSC.** The health and safety objectives that are selected each year are based on results of the COR audit, specifically opportunities for improvements, and through the analysis of incident reports, near miss reports, first aid reports and incident investigations. In addition, recommendations from workers through the safety recognition program or through the JHA and toolbox talk meetings may offer insight into the selection of measurable health and safety objectives.
 - iii) **Action plan(s) to achieve the objectives will be developed based on the results of the COR audit and preventative and corrective measures that have been developed and/or implemented.** The action plan will assign the corrective action to the appropriate personnel with a target due date for completion. The status of the action plan(s) will be reviewed quarterly by senior management during the quarterly meeting. The action plan(s) will be communicated with the JHSC and with all personnel during the annual company-wide safety day held in March of each year.
 - iv) **The resources that are required to reach the objectives will be discussed with the JHSC and with senior management during the quarterly meetings.** Any new resources that are required, or significant changes in the existing available resources will be analyzed/evaluated as per HSMS 14-04 (Management of Change).
 - v) **Revisions to any other elements of the occupational health and safety management system will be made appropriately.** Most revisions or updates take place during the first quarter of each year. The safety department will review all policies, procedures and practices and consult with pertinent personnel such as superintendents and senior management where necessary. The safety department will also ensure compliance with legislation and regulations in accordance with HSMS 13-01 (Legislation). Upon creating a new policy, procedure or practice, or revising existing policies, procedures and practices, will review these documents with the company president who will authorize them and sign off. The revised policies, procedures or practices will then be added

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- to the health and safety management program and communicated to the appropriate personnel through meetings, memos, emails or toolbox talks.
- vi) **Removed barriers to the worker participation** in the occupational health and safety management system will be communicated with the JHSC and senior management by the safety department during the quarterly meetings, and in some cases, during the weekly superintendent meetings. In addition, the effectiveness of the methods used to remove the identified barriers will be evaluated by the safety department and communicated to the JHSC and to senior management.
- vii) **Communication of the objectives and action plan(s) to all employees** takes place during the annual company-wide health and safety day held in March of each year. Portions of the objectives and action plans are also sent throughout the year via toolbox talks.
- viii) **Specified forms for recording Management review** (minutes taken and submitted through SiteDocs).
- ix) **The method for maintaining records** as per will be as per HSMS 1-03 Document and Record Control.

PROCEDURES

Establishing Corporate Health & Safety Goals and Maintenance

Senior Management has established corporate goals for the organization to achieve COR certification.


To achieve these goals, the company must obtain the necessary resources to implement the program.

The expected outcome for the implementation of the program is:

- Implementation and maintenance of the Health & Safety Management System.
- Evaluate the Occupational Health & Safety Program and Management System performance against a generally accepted set of evaluation criterion developed by and for the construction industry.
- To identify any conformity and/or non-conformity to the Company's Health & Safety Program.
- Plan and set targets in a prioritized action plan to ensure continuous improvement of systems and programs.
- To ensure the management system has incorporated a monitoring function to verify implementation of action plan items.
- Prepare for a formal Accreditation Program using the COR Audit Program.

The internal auditor is required to complete an annual report that identifies the gap in the current program and works together with management to create an action plan.

An approved (signed by senior management), prioritized action plan (complete with assignment of responsibility and anticipated implementation dates) will be drafted and provided to all management staff to be addressed with all personnel.

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This will be accomplished in any of the following manners:

- At a company staff meeting
- Safety committee(s) meeting
- JHSC meetings
- During toolbox talks
- At site progress meetings
- A company memo/newsletter to all staff acknowledging the results of the formal review/evaluation and thanking everyone for their support and participation.

All revisions to the Health & Safety Program Manual shall be recorded in the program maintenance log listing the reason for the revision, the revision number and the date completed.


Also included in the management review are:

- **Inputs to management** such as the status of corrective actions, investigations, worker reviews of new equipment and new procedures and proposed solutions to safety challenges. Information from researching new equipment, procedures and regulatory or other requirements is also communicated during the management review meeting.
- All updated and revised policies and procedures are reviewed by senior management.
- Recommendations from the JHSC
- Recommendations from workers
- The results of emergency preparedness drills
- Incident reports and accident investigations
- Pertinent WSIB reports
- MLITSD Reports
- COR audit reports
- Gap Analysis
- Action Plan Updates
- **Outputs from management** such as reviewed and signed policies and procedures
- Reviewed JHSC recommendation forms and recommendations from the employer to the JHSC and to the safety department
- Information regarding future growth plans
- Any items of which senior management requests the involvement of the safety department or JHSC.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Management Review Program.

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- Allocate appropriate resources, training, and employees to implement and maintain the Management Review Program.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.
- Management will review gap analysis and take the assigned actions to correct identified gaps in the programs.
- Ensure that compliance reviews are completed monthly, quarterly, and annually at the established management meetings.
- Participate in establishing goals and objectives for the continuous improvement action plan.
- Sign the action plan when required.
- Appoint an Internal Auditor to manage the overall program.
- Assume responsibilities for the program support of all elements of the COR Program.
- Ensure that the program elements have been communicated to all members of the company.

Foremen/Supervisors/Managers/Superintendents will:

- Be knowledgeable in the Management Review Program and established safety goals for the company.
- Read and acknowledge the roles & responsibilities of their position.
- Contact the Health & Safety Department for support as required to ensure the ongoing compliance of the Health & Safety Program.
- Attend and participate in safety meetings for management.
- Communicate with workers and post the company's monthly trend analysis and action plans on the jobsite.

Workers will:


- Participate in any toolbox talks on safety performance and analysis.
- Review the posted trend analysis as reported.
- Report any infractions of the Occupational Health and Safety Act and applicable regulations to your immediate Superintendent/Foreman.
- Have awareness, understanding and acknowledgement of King Paving & Construction Ltd.'s COR Audit Program and Action Plan.

Subcontractors will:

- Have awareness, understanding and acknowledgement of King Paving & Construction Ltd.'s COR Audit Program and Action Plan.

Joint Health & Safety Committee members will:

- Work together with the Health & Safety Department and management to review the Management Review Program annually and make recommendations for continuous improvements.
- Re-enforce compliance of the company's COR Audit Program and Action Plan.

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- Review the quarterly safety trend analysis report and make recommendations for improvement.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained at the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the program are embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Safety Day, Toolbox Talks or onsite training.
- Ensure tracking of the safety data and prepare the monthly, quarterly, and annual reports for review.
- Present the results to all levels of management and the JHSC.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Be responsible for scheduling meetings and invitations to those involved in the review process.
- Keep abreast of the updated legislation with regards to OHS standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Complete required training to maintain and support the COR Audit Program.
- Ensure compliance with the audit requirements of the COR Program.
- Secure all required reports from WSIB that will be included as reference.
- Correspond with third party organizations as required for the maintenance of the Management Review Program.

TRAINING/RECORD KEEPING

Training for those individuals responsible for reviewing, analyzing, and preparing the reports will be completed as required. Third party consultants are available through the Safety Group membership and will be consulted as required.


The annual review will be completed with the third-party consultant reviewing the CAD-7 and any changes to the WSIB that could impact on the company's overall safety performance rating.

The Health & Safety Department will retain the trend analysis records for a minimum of three years to provide a baseline comparison for overall safety performance improvement.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings


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- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

WSIB WSIR Report
 Trend Analysis Report
 SiteDocs Performance Reports
 Performance Evaluations
 Health & Safety Management Program
 Senior Management Continuous Improvement Plan
 HSMS 12-01 Statistics and Records
 HSMS 13-01 Legislation
 HSMS 14-02 Management Review Procedure
 HSMS 14-03 Health and Safety Audit
 HSMS 14-04 Management of Change
 COR Action Plan
 COR Audit Program
 COR Audit Reports
 Gap Analysis
 Corrective Action Plans
 Management reviews

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JHSC reviews

Statistical Trend Analysis

Annual Company Health and Safety Goals

Senior Management Accountability and Due Diligence


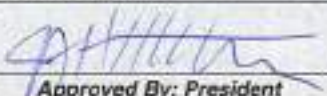
Document Maintenance and Tracking Log

CONTINUOUS IMPROVEMENT

This policy and process for the Management Review Program will be reviewed annually jointly by Senior Management, the Health & Safety Department and the JHSC.

Legislative and industry updates will be reviewed to ensure the Management Review Program meets the guidelines as required for Element #19 in the Ontario Provincial COR Program. The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

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HEALTH & SAFETY PROGRAM REVIEW PROCEDURE

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all employees, subcontractors, and visitors. The purpose of this procedure is to outline the activities involved in completing an annual review on the Company's Health & Safety Program as per HSMS 14-01.

Senior Management will meet to complete a review of legislative updates, safety performance, incident types, changes to work procedures and work process updates, company performance compared to industry standards, identify performance gaps, and create an action plan for improvements.

The information reviewed at this meeting will assist Senior Management in many different functions such as budgeting for training and new equipment purchases, performance management, compliance with the Occupational Health and Safety Act and other legislative requirements, establishing Health & Safety performance goals for the following year, ongoing compliance with industry construction standards, developing a continuous improvement plan and the accreditation of the standard for the COR Program.

GOAL OF REVIEW

- To identify any conformity and/or non-conformity to the Company's Health & Safety Program.
- Plan and set targets in a prioritized action plan to ensure continuous improvement of systems and programs.


REVIEW PROCESS

- Schedule annual program review date.
- Arrange the meeting room and send out invitations to Senior Management.
- Assemble reports to be reviewed at meetings.
- Create an agenda.
- Complete program review.
- Prepare action plan.
- Communicate action plan.

The approved audit tool used to review the health & safety management system will be the current COR Audit Program for the province of Ontario. Senior Management will designate a person who will assume the responsibility of the internal auditor. Refer to HSMS 14-03 – Health and Safety Audit.

The internal auditor is required to complete an annual report that identifies the gap in the current program and works together with management to create an action plan.

The internal auditor will be responsible for organizing and communicating the details of the annual review to Senior Management.

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An approved (signed by Senior Management), prioritized action plan (complete with assignment of responsibility and anticipated implementation dates) will be drafted and provided to all management staff to be addressed with all personnel. All revisions to the Health & Safety Program Manual shall be recorded in the program maintenance log, listing the reason for the revision, who completed the revision, the revision number and the date completed.

COMMUNICATION OF PROGRAM REVIEW ACTION PLAN

Communication of the HSMS action plan will be communicated to management through any of the following means:

- Scheduled meetings
- Safety communication board postings
- Company emails

Communication to all workers will be completed by the Vice President through the Annual Safety Day.

Records of communication will be recorded and stored using SiteDocs or other means when required.

The procedure will be reviewed and modified as required at least annually.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy	COR requirement Element #19	Jan 23, 2018	000
Update policy	Annual review & company name change	Oct 17, 2019	001
Update policy	Annual review	Feb 13, 2020	002
Update policy	Annual review	Feb 01, 2021	003
Update policy	Annual review	Feb 01, 2022	004
Update policy Slight wording change in first paragraph	Annual review	Jan 16, 2023	005
Update policy	Annual review	Jan 23, 2023	006
Replaced eCompliance with SiteDocs	Change of safety platform	Nov 14, 2024	007
Added references to HSMS 14-01 and 14-03	Annual Review	Feb 14, 2025	008

Health and Safety Audit Policy and Procedures

Issue Date: January 25, 2022

Revision Date: February 14, 2025

Revision Number: 004



Policy Number: HSMS 14-03


 Approved By: President

POLICY STATEMENT

It is the policy of King Paving & Construction to continuously improve our health and safety management system and to measure successes through annual safety audits. To this end, King Paving & Construction is enrolled in the IHSA COR (Certificate of Recognition) program. King achieved certification in December 2018 and achieved recertification in December of 2021. We recently achieved our second recertification in December of 2024.

The goal of this policy is to identify non-conformities (COR Audit Results), reduce risk and increase safety awareness for all personnel. Upon completion of the COR audit, an organized list of non-conformities will be generated and ranked as to their risks and priority. The action plan and continual improvement plans generated will offer us a means to eliminate or control safety risks, therefore, reducing incidents and accidents.

Additional: King Paving & Construction will gain insight as to employee understanding of our health and safety policies and procedures. Regular communication with senior management, site superintendents, project managers and workers will increase safety awareness and allow us to develop specific safety policies to ensure for the safety of all concerned. All findings will be reported to senior management, project managers, superintendents, and workers on a regular basis.

SCOPE

The audit will apply to all personnel within the company including all active work sites. The auditor will also seek suggestions from the superintendents that are based on their specific sites to further develop the King Paving & Construction health and safety program.

DEFINITIONS

Audit: An in-depth inspection and analysis for the company's health and safety program to measure the effectiveness of each element of the health and safety management system program and COR requirements.


HSMS: Health and Safety Management System

COR: Certificate of Recognition. A program designed to audit all facets of the health and safety management system.

CAP: Corrective Action Plan

CIP: Continual Improvement Plan

MAP: Maintenance Action Plan. MAP is a pilot project being offered by the IHSA to a select group of companies. MAP is only available for the year immediately following a successful external audit. The program involves creating and implementing an in-depth action plan that targets deficiencies, opportunities for improvement and continuous improvement in lieu of conducting an internal audit. An application and proposal

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must first be sent to the IHSA for approval. King was selected for 2025, and our application and proposal was approved.


REQUIRED RESOURCES

- Trained and authorized COR auditor
- All policies, procedures, and practices (located on shared drive)
- Access to SiteDocs
- Access to all foremen, superintendent, JHSC, senior management and health and safety officer site inspections
- All near miss, incident, and accident reports
- All investigation documentation
- Safety Data Sheets
- Training Matrix
- Time to conduct the audit and prepare reports.
- The current and previous years action plans.
- Annual health and safety day attendance sheets, presentations, and quizzes.
- Orientation records
- External equipment inspection reports such as fire extinguishers, harnesses, and confined space equipment
- Hazard assessments
- Minutes to JHSC and senior management meetings
- Cell phone/camera
- Access to the WSIB
- The COR 2020 audit tool
- Audit soft program
- Previous COR audit reports
- Gap analysis documentation
- Records of meetings
- Photos from sites
- Pre-use and pre-trip inspection forms
- Scheduled COR related meetings

PROCEDURE

The following systematic HSMS process is in place:

1. Prepare and initiate the COR audit
2. Conduct the COR audit and gather evidence

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3. Write an audit report
4. Management will review the audit results
5. A Continual Improvement Plan/Action Plan will be created and initiated


The following process will be followed:

1. PREPARE AND INITIATE THE AUDIT

- King Paving & Construction has opted to follow the IHSA COR Program and audit tool.
- Prior to the official audit, an informal company-wide pre-audit will take place to identify non-conformities and institute corrective measures. This pre-audit will take place during the months of July and August of each year.
- Communication will take place in the form of JHSC meetings, Senior Management meetings, Superintendent meetings and through weekly toolbox talks. Conformities and non-conformities will be reviewed.
- The Corrective Action Plan/Continuous Improvement plan will be updated and reviewed by the JHSC and the Senior Management team. All non-conformities and action items will be communicated to the supervisory staff and to the workers through any of the following: emails, toolbox talks or in-person meetings.
- The lead internal auditor that was selected is Mike Gzik, the Safety Officer for King Paving & Construction. COR Essentials, Basic Auditing Principles and COR Internal Auditor training was completed by Mike Gzik in February of 2015. Introduction to Hazard and Risk Management training course was completed by Mike Gzik on September 8th, 2016. The 6 COR Workshops were completed on March 21, 2017.
- Based on the total number of employees, the number of sites, management interviews and worker interviews will be determined and selected as per the IHSA COR guidelines. Typically, 3 active sites will be selected for audit, plus the office and the yard. In addition, 9 workers will be interviewed, and 4 managers will be interviewed. The sites to be selected will be at varying levels of completion.
- The health and safety program manual, policies, procedures, and practices will be audited based on the elements of the COR audit. This portion of the audit will take place between June and September of each year.

2. CONDUCT THE AUDIT


- All policies and procedures from the health and safety program manual and all safe work practices and procedures will be audited in accordance with the COR audit questions indicated in each element. In 2022, King Paving & Construction switched over to the 2020 version of the COR audit and will now continue with that version until such a point as that version of the audit is updated or revised.

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- Document Review: All documents such as safety inspections, superintendent's logs, incident reports, first aid reports will be reviewed and audited by the health & safety officer/certified COR internal auditor.
- All JHSC meetings, senior management meetings Daily JHA meetings, toolbox talks, and quarterly health and safety meetings will be audited.
- Training records will be verified.
- The internal audit will be conducted each year throughout October. An external audit is required every 3 years. The last external audit took place in October of 2021 in which King Paving & Construction earned COR recertification.
- The IHSA auditor will conduct the audit every 3 years and will be accompanied by the health & safety officer. The 3 sites will be selected along with the office and the yard.
- An opening meeting will be held with senior management to inform them of the audit process and which sites have been selected for the audit.
- Evidence will be gathered through site inspections/audits. All required documentation must be onsite and readily available. This includes policies, procedures, practices, operator manuals, training certificates, safety data sheets, labels, postings, training certificates, notice of project, contractor information, form 1000's, and inspection tags/stickers.
- Each site will be audited to ensure that all safety equipment such as first aid kits, eye wash bottles, fire extinguishers, harnesses, ropes, lanyards, tripods, etc. All equipment must be inspected, and inspection tags/stickers filled out.
- The auditor will determine if all appropriate PPE is on site and readily accessible to the workers. The auditor will observe all personnel on site to ensure that the correct PPE is being worn based on the tasks that are being performed.
- The auditor will observe daily JHAs and/or a weekly toolbox talk to ensure that the correct information is being communicated to the workers based on the tasks to be performed.
- The auditor will observe workers performing several tasks and compare the observation with the written policies, procedures, and practices to ensure that the aforementioned points are being followed.
- The auditor will complete the COR audit tool.

3. AUDIT REPORTS & MANAGEMENT REVIEW

- The auditor will generate a COR audit report to summarize the findings of the audit.
- The auditor will formulate a gap analysis to determine non-conformities and make recommendations for improvement.
- The health & safety officer/COR auditor will hold a closing meeting with senior management where the results of the audit will be reviewed along with the gap analysis and the corrective action plan.
- The results of the audit will be communicated to all supervisory staff and will be included as a toolbox talk to be communicated to the workers.

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- The health & safety officer will communicate the corrective action plan based on the audit, gap analysis, and recommendations made by the JHSC, supervisory personnel and workers. More in-depth communication will take place during the annual safety day to be held in March.
- New company safety goals will be selected by the health and safety officer and senior management team which may be based on recommendations made by the JHSC and workers.

4. ACTION PLAN

- A corrective action plan/continual improvement plan will be generated from the audit report and will address all non-conformities.
- Non-conformities will be rated as major or minor and will be prioritized as high or low priority.
- The CIP will include detailed action points and will be initiated in the current year.
- All remaining non-conformities will be corrected within one year from the initiation of the CIP.
- All non-conformities will be addressed prior to the next scheduled audit.
- The CIP or CAP will include the name of the person responsible for each item when the item will be corrected and the process to be utilized to correct the non-conformity.

5. EVALUATION AND CONTINUAL IMPROVEMENT

Evidence for each element of the COR audit is verified through documentation, interviews, and observation. The results of the evidence will be logged and matched against the scoring section provided for the COR audit tool.

Any items found within the COR elements that do not meet the minimum standard will be considered non-conformity and added to the corrective action plan/ continual improvement plan.

6. COMMUNICATION

Meetings will be held at each worksite during the weekly safety inspections conducted by the safety officer. These meetings will include the safety officer, superintendent and/or foreman and King Paving & Construction workers.


All relevant information will be discussed as well as logged into the inspection forms. A site safety briefing will also be generated and uploaded to SiteDocs. The health & safety officer inspections will be signed off by the president. Superintendent inspections are signed off by the senior project manager, foremen inspections are signed off by the superintendent and daily worker inspections are signed off by the foremen.

All inspections, toolbox talks, JHAs and safety meetings must be uploaded to SiteDocs for review and sign off.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Health and Safety Management Audit program.

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- Allocate appropriate resources, training, and employees to implement and maintain the Health and Safety Management Audit program.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.
- Management will review gap analysis and take the assigned actions to correct identified gaps in the programs.
- Ensure that compliance reviews are completed quarterly and annually at the established management meetings.
- Participate in establishing goals and objectives for the continuous improvement action plan.
- Sign the action plan when required.
- Appoint an Internal Auditor to manage the overall program.
- Assume responsibilities for the program support of all elements of the COR Program.
- Ensure that the program elements have been communicated to all members of the Company.
- Participate in the COR audit questionnaire if selected.

Foremen/Supervisors/Managers/Superintendents will:

- Be knowledgeable in the Health and Safety Management Audit program and established safety goals of the Company.
- Contact the Health & Safety Department for support as required to ensure the ongoing compliance of the Health & Safety Program.
- Cooperate fully with the Health & Safety Department.
- Attend and participate in safety meetings for management.
- Communicate with workers and post the Company's monthly trend analysis and action plans on the jobsite.
- Communicate the requirements of the COR audit program.
- Communicate the results of the COR audit, gap analysis and action plan to the workers.
- Seek safety recommendations from workers and communicate them to the Health & Safety Department or JHSC.
- Participate in the COR questionnaire if selected.

Workers will:

- Participate in any toolbox talks on safety performance and analysis.
- Review the posted trend analysis as reported.
- Report any infractions of the Occupational Health and Safety Act and applicable regulations to your immediate Superintendent/Foreman.
- Cooperate fully with the Health & Safety Department.
- Have awareness, understanding and acknowledgement of King Paving & Construction Ltd.'s COR Audit Program and Action Plan.
- Follow all established health and safety policies, procedures, and practices.

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- Participate in the COR questionnaire if selected.

Subcontractors will:


- Have awareness, understanding and acknowledgement of King Paving & Construction Ltd.'s COR Audit Program and Action Plan.

Joint Health & Safety Committee members will:

- Work together with the Health & Safety Department and Management to review the Health and Safety Audit Program annually and make recommendations for continuous improvements.
- Re-enforce compliance of the Company's COR Audit Program and Action Plan.
- Review the quarterly safety trend analysis report and make recommendations for improvement.
- Make specific recommendations regarding non-conformities observed during the COR audit.
- Participate in the COR questionnaire if selected.

Health & Safety Department will:

- Ensure that the program and relevant operating procedures are maintained at the jobsites or workplace.
- Communicate the requirements of the program and associated procedures with all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the program are embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through Safety Day, Toolbox Talks or onsite training.
- Ensure tracking of the safety data and prepare the monthly, quarterly, and annual reports for review.
- Present the results to all levels of management and the JHSC.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the program, as required.
- Be responsible for scheduling meetings and invitations to those involved in the review process.
- Keep abreast of the updated legislation with regards to OHS standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Complete required training to maintain and support the COR Audit Program.
- Ensure compliance with the audit requirements of the COR Program.
- Secure all required reports from WSIB that will be included as reference.
- Correspond with third party organizations as required for the maintenance of the Management Review Program.

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TRAINING/RECORD KEEPING

Training for those individuals responsible for reviewing, analyzing, and preparing the reports will be completed as required. Third party consultants are available through our Regional Construction Group membership and will be consulted as required.

The Health & Safety Department will retain the trend analysis records for a minimum of three years to provide a baseline comparison for overall safety performance improvement.

The Internal COR auditor must be certified by the IHSA which includes participating in the following IHSA COR training courses:

1. COR Essentials
2. Basic Auditing Principles
3. COR Internal Auditor
4. Introduction to Hazard and Risk Management


The Company President or a Senior Manager must have participated in the IHSA COR Essentials training program.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.


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REFERENCES

WSIB WSIR Report
 Trend Analysis Report
 SiteDocs Performance Reports
 Performance Evaluations
 Health & Safety Management Program
 Senior Management Continuous Improvement Plan
 COR Action Plan
 COR Audit Program
 Senior Management Accountability and Due Diligence

Associated Documents, Forms, and References

- COR interview questionnaire
- COR audit tool
- Site safety inspection forms
- Incident reports (HSF 10.2)
- First aid reports (HSF 10.0)
- Training records and training material
- Job Hazard analysis forms (HSF 2.1, 8.0 & 2.2)
- Pre-shift inspection forms (HSF 9.3 & 9.8)
- Project hazard analysis forms (HSF 2.3)
- Sign in sheets
- Safety group progress reports review forms and the CIP/CAP
- Ministry of Labour field visit reports
- Maintenance logs
- King Paving & Construction Health & Safety Program manual

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- King Paving & Construction SWP manual
- King Paving & Construction Orientation
- HSMS 15-03 Environmental Policy

Additional reference materials are as follows:

- IHSA COR training manuals
- WSIB Regional Construction Group program – guidelines
- Ontario Occupational Health and Safety Act – Construction Regulations
- Ontario Occupational Health and Safety Act – Industrial Regulations
- Highway traffic act – Traffic Control book 7
- Ontario Fire Code
- Building Code
- WHMIS 851 Regulation (WHMIS 2015)
- Equipment safety manuals
- Canada Labour Code
- TSSA standards
- C.S.A. Standards

CONTINUOUS IMPROVEMENT

This policy and process for the Health and Safety Audit Policy will be reviewed annually jointly by Senior Management, Health & Safety Department and the JHSC.

Legislative and industry updates will be reviewed to ensure the Health and Safety Audit Policy as well as the Management Review Program meet the guidelines as required for Element #19 in the Ontario Provincial COR Program. The amended policy shall be kept as a record of review and the required changes.

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POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, subcontractors, and visitors. The purpose of this policy is to provide written guidelines regarding changes made within the company pertaining to personnel, policies, procedures, practices and purchases of goods and services.

The Management of Change policy and procedures will ensure that due diligence has been undertaken when changes are made within the company regarding regulatory requirements, proper research of suppliers and notification of pertinent personnel within the company when changes are made.

SCOPE AND REGULATION

This policy pertains to all workers, visitors, subcontractors, and service providers at all work locations where King Paving & Construction Ltd. conducts business.

The policy will outline the roles and responsibilities that have been established and will be enforced as part of our due diligence.

King Paving & Construction will utilize the following resources when changes are made where applicable:

- Occupational Health and Safety Act
- O. Reg. 213/91 Regulations for Construction Projects
- O. Reg. 891 Regulations for Industrial Establishments
- Ministry of Transportation (MTO)
- Canada Labour Code
- Ontario Book 7
- C.S.A. Standards
- Commercial Vehicles Operator's Registration System
- Manufacturers Maintenance Program and Operator's Manuals
- Any other guidelines, standards, regulations, policies, and procedures that may apply


DEFINITIONS

For this policy, the following definitions will be used.

Change: - To make something different by altering, modifying, replacing, or procuring

Company – Means the company to whom a subcontractor is providing services for. (e.g., King Paving & Construction Ltd.)

Commercial Vehicle Operator's Registration (CVOR) – An automated monitoring system that tracks the on-road safety performance of Commercial Motor Vehicle (CMV) operators. The goal of the CVOR System is to

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improve safety for all users of Ontario highways and develop effective compliance strategies with emphasis on safety and protection of the highway infrastructure.

Defective – Means the tool, vehicle or equipment does not meet the operating standards and must be taken out of service. A repair or replacement must be completed to meet compliance. The tool must be taken out of service and tagged with a "Do Not Use" tag.

Pre-Use Inspection – Visual inspection completed by the person/operator going to use the tool/vehicle or equipment. The inspection should focus on the current condition of the unit. Look for excessive wear or damage that would prevent the tool/vehicle or equipment from performing safely.

Annual Inspection – Pertains to tools, vehicle or equipment that requires annual inspection by a competent and certified inspector. Inspections are outlined in the manufacturer's manual.

Preventative Maintenance – Is a schedule of planned maintenance actions aimed at the prevention of breakdowns, failures, and potential risk of injury to workers.

CVOR Schedule 1 – Standard list of required vehicle components that must be checked daily as outlined in the MTO schedule 1 chart.

Ministry of Transportation – Is a ministry responsible for transportation within Canada. It usually is administered by the Minister of Transport. The term is also sometimes applied to the departments or other government agencies administering transport within nations that do not employ ministers.

Commercial Motor Vehicle – For the purpose of every provision of the Act and the regulations, "commercial motor vehicle" includes the following, even if it does not have a truck or delivery body attached to it:

- A motor vehicle commonly known as a tow truck.
- A mobile equipment vehicle.
- A vehicle built on a truck chassis O. Reg. 399/16, s.2.


Qualified Person – Is deemed to be qualified due to training and experience with the operations, inspection, and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

Procurement – The act of researching and purchasing goods and services.


REQUIREMENTS

As per COR Element 14.2.2, King Paving & Construction requires the following:

- a) A listing of the roles and responsibilities of relevant parties. These are listed in the Responsibilities section of this procedure.
- b) The management of change procedure will be implemented when:

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- i. There is a change in legal requirements. The health & safety department will regularly check the MOLITSD website for changes in legislation/regulations. In addition, the safety department receives updates in legislation from various associations that King Paving & Construction belongs to, such as the HHCA, ORBA and ISWCA via emails and monthly newsletters. When a change in legal requirements takes place, the safety department will revise or update the appropriate policies, procedures and practices to reflect the changes, and will communicate the changes to all personnel that the change applies to. This communication will take place via emails, memos, or meetings. If the change affects workers, the workers will be notified during the weekly toolbox talks and/or during the annual company-wide health and safety day which takes place in March of each year.
 - ii. There is a significant change in work processes, control measures, equipment, organization, work location, or any other significant change. When a significant change occurs, this management of change procedure will be applied to ensure that all facets of the change are analyzed, and the corresponding policies, procedures and practices will be revised or updated as necessary. When a significant change is identified, the revisions, updates or other changes will be communicated to all pertinent personnel via emails, memos, and meetings. As above, any significant change that affects the workers will be communicated via toolbox talks and during the annual health and safety day.
 - iii. New products, processes or services are introduced. When new products or services are introduced, KPC will follow the procedures listed below in the procedures and responsibilities section of this policy. The new product or service will be researched to ensure that the criteria is met. All users of the new equipment or service will be instructed regarding the new product (operation), or service used via training sessions, emails, memos, meetings, or toolbox talks.
 - iv. There is an introduction of new developments in occupational health and safety knowledge or technology. When new developments in occupational health and safety knowledge or technology take place, KPC will follow the procedures listed below in the procedures and responsibilities section of this procedure. New developments in occupational health and safety knowledge will be communicated in a timely manner to all pertinent personnel (which may include workers) via emails, memos, meetings or toolbox talks.
- c) King Paving & Construction requires the application of COR element 2 Hazard Assessment, Analysis and Control (HSMS 2-01) and Element 3 Controls (HSMS 3-05) to any identified changes. When new practices or procedures are required to be written, the procedures HSMS 3-01 Safe Work Practices Policy and HSMS 3-02 Safe Work Procedures will be followed.
 - d) King Paving & Construction will provide information and training for relevant workplace parties where appropriate. As per this policy and policies HSMS 3-01 Safe Work Practices, HSMS 3-02 Safe Work Procedures, HSMS 8-01 Training and Communication, HSMS 8-02 Health and Safety Orientation Policy, and HSMS 8-04 Networking and Peer Learning, King Paving & Construction will ensure that the provision of information and training for relevant workplace parties will take place.

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POLICY

Whenever a change occurs within the organization, specific procedures will be followed to ensure that King Paving & Construction is adhering to all regulatory requirements, standards, guidelines and internal policies and procedures.

The following is a list of potential changes that may occur within the company:

Change of Personnel: This can be a result of promotions, transfers, retirements, leaves, terminations and the hiring of new personnel.

Change in Policies and Procedures: All policies, procedures and practices are reviewed and updated each year to ensure compliance with regulatory requirements. New policies and procedures are also created, reviewed, and added to the health and safety program throughout the year.

Change in Equipment: This can be a result of repairing or replacing defective equipment, upgrading equipment, or adding new equipment.

Change of Location: This can be a result of relocating the office, plant, or storage facilities.

PROCEDURES AND RESPONSIBILITIES

CHANGE OF PERSONNEL:

Unless deemed as confidential, the following procedures will be followed:


Promotions: When a person is promoted, the department head or president will send out a memo to inform all personnel to notify them of who received the promotion, the new title, and the start date of the new position.

Transfers: As with promotions, the department head or president will send out a memo to notify all personnel of the transfer.

Retirements: Upon giving notice of the retirement date, a memo will be sent to all personnel to notify them of the retirement. The retiree will make the necessary arrangements with the payroll department, who will ensure that the proper paperwork is completed and will make arrangements regarding remuneration and pension transfer.

Leaves: In most cases, leaves will be treated as confidential. Only pertinent personnel will be notified of the leave and its duration. The payroll department will assist with filling out the correct documentation to ensure that the person taking the leave receives their proper benefits. Any worker who is on medical leave or modified duty must follow the procedures as outlined in the King Paving & Construction Early and Safe Return to Work program.

Terminations: The department head or president will notify pertinent personnel of the termination. To protect the dignity of the person being terminated, the reason for the termination will be kept confidential.

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New Hires: Payroll and the safety department will be notified when a new hire joins the company. All new hires must take part in the company safety orientation and online training courses will also be assigned. In addition to the normal documentation, the new hire must complete the training and orientation. Once completed, they may be assigned to their position and begin work on the day agreed upon by the company and the new hire. The payroll department will require the name of the person, the start date, their duties, their local union where applicable, who their supervisor will be and what location they will start work at.

CHANGE OF POLICIES AND PROCEDURES:


New Policies and Procedures: New policies and procedures are created based on hazard assessments, incident reports, accident reports, near miss reports, or when a new hazard has been identified. When a new policy or procedure is created, it will be reviewed by the health & safety department to ensure that all legal or regulatory requirements have been met. The health & safety department will ensure that the new policy or procedure does not conflict with any existing policies or procedures. The JHSC will review and make any recommendations, and the final draft will be reviewed and signed by the company president. All personnel will be informed of the new policies and procedures via toolbox talks and/or during the annual safety day.

Changes in Legal Requirements: As legal requirements change, King Paving & Construction will update or revise all pertinent policies, practices and procedures to meet or exceed the new legislation, regulations, standards or guidelines.

New Developments in Occupational Health & Safety Knowledge or Technology: As new safety knowledge or methodology becomes available, KPC will research the benefits and incorporate them in the best way possible to suit the needs. As newer, safer, and more efficient technologies become available, the Joint Health and Safety Committee will determine if the new technology will be beneficial to the company, analyze the cost/benefit ratio, and if advantageous, will make a recommendation to Senior Management to purchase and incorporate the new technology.

Updated/Revised Policies and Procedures: The health & safety department reviews, revises and updates all policies, procedures, and practices annually. The same procedure is followed as listed under new policies and procedures.

Significant Changes in Work Processes and/or Controls: When there are significant changes in work processes, a hazard assessment will be conducted and control measures will be added, updated or revised. This will include input from workers, supervisors, managers and the JHSC. Once the new work process(es) and control(s) have been developed, they will be communicated to all relevant personnel through specialized training, site meetings or toolbox talks. The new processes and controls will be monitored and adjusted as necessary, and the health and safety department will measure the effectiveness of the new processes and controls.

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CHANGE IN EQUIPMENT:

Repairs: All repairs to equipment will be conducted by a competent source. When a piece of equipment requires repair, King Truck & Equipment Repair (KTR – 3rd party service provider) must be notified so that suitable arrangements can be made. Certain repairs can be conducted while the equipment is on site, whereas other repairs require the equipment to be removed from the site. Any repairs, regardless of location, will be fully documented. Most repairs are completed by King Truck & Equipment Repair; however, certain repairs must be completed by an outside source. When this is the case, King will ensure that the work is completed by competent and qualified organizations and personnel. The trucking & equipment superintendent and the health & safety department will track repairs and look for trends to find better solutions and to revise any procedures which may be inadequate.

Replacement: From time to time, equipment will need to be replaced due to ongoing service problems or wear and tear. Common items such as drill bits, saw blades and small power tools are generally replaced by the foremen or superintendent. An investigation will take place if the reason for the replacement of the common item is due to an incident or accident.


When larger equipment and machinery needs to be replaced, the company will determine the reason(s) that the equipment became defective and investigate the past service history. This will allow the company to make a more informed decision regarding what brand and model to purchase based on the use of the equipment.

As with repairs, replacing or purchasing new equipment may require a review of the specifications to ensure that the equipment or machinery meets all regulatory requirements.

Upgrading and Adding New Equipment: The following are to be considered when upgrading or purchasing new equipment:

- The reason for the upgrade or new equipment (i.e., increased efficiency, improved safety, better quality)
- How frequently will the equipment be used?
- Who will be using the equipment (which crew, specific operator, etc.)
- Does the equipment meet all legal requirements?
- Does the equipment appear to be easier to maintain?
- What is the history of the equipment and the reputation of the provider?
- Have comparisons been made between similar types of equipment?
- Will the equipment meet all our requirements?
- Is specialized training required?
- Will the cost justify the means?
- Has the JHSC been notified of the intention of the purchase of new or upgraded equipment and were they given the opportunity to review the goods or services in question?

Changes in Products or Services: From time to time, the need may arise to change products or services to better suit the safety needs of the company. When this is the case, the methods listed for upgrading and adding new equipment (above) will be used. New services or service providers will be researched by Senior

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Management, Superintendents, the Health & Safety Department and the JHSC to determine the best fit for King Paving & Construction based on quality, price, warranties, efficiency, availability, reputation, ease of maintenance, and safety history.


CHANGE OF LOCATION:

Office: If the office location changes, all personnel are to be notified as early as possible to allow the staff to make the necessary arrangements to facilitate the move in a safe and efficient manner. The personnel involved will need to consider the following:

- Will a moving company be involved?
- How will confidential documents be protected?
- What would be the best layout for offices and personnel?
- Is there a significant change in the travel time for people to get to and from work?
- Is the building secure? Is there adequate security and a fire alarm system?
- Is the parking lot well lit?
- Does the building have a security system?
- Are there cameras?
- Does the office have a separate security system?
- Will the office furniture and equipment fit in the new location?
- Is the ventilation system in good condition and clean?
- Is the HVAC system controlled by the building management or is there a way to control the temperature in the office separately?
- Is there more than one emergency exit/route and can it be maintained?
- How often will the office be cleaned and by whom?
- Is the wiring adequate?
- Are the washrooms in good condition and properly maintained?
- Does the building meet the requirements set forth in the Access for Ontarians with Disabilities Act?
- Is the parking lot clear of snow in the winter?
- Does the location provide good WIFI and cell phone signals?
- Is the new location in a high crime area?
- What are the reasons for the move?

Field/Site Location Changes: Site location changes are very common in the construction industry. When changing site locations or sending the field crew to different sites, the following must be considered:


- Will there be a site trailer?
- How many portable washrooms are required as per the regulations?
- How often are the portable washrooms scheduled to be cleaned?
- Will traffic control be required? Has a traffic control plan been developed and discussed with the workers?
- How busy are the roads?

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- Is the site in a hospital or school zone?
- Is the site in a residential or commercial location?
- What type of work will be conducted on site?
- Will enough ground spotters be available?
- What types of equipment will be on site?
- Does the municipality prohibit work at certain times (i.e., evenings, weekends, holidays, rush hours)?
- Is the required P.P.E. on site and available?
- What time of year is the site work taking place and what are the expected weather conditions?
- Is the route to the nearest hospital or emergency services clinic printed out and posted?
- Who is the superintendent?
- Who are the foremen?
- Who are the workers?
- Will subcontractors be used? If so, which subcontractors?
- Have all personnel received the required safety training?
- Will confined space entry be involved?
- Will there be trench work and have the proper trench boxes been ordered.
- What kind of signage is required?
- Have utility locates been performed and updates as required?
- How far will workers have to travel to get to and from the site?
- Has carpooling been arranged?
- Is night work involved? If so, is proper lighting available?
- Have nearby residents been notified of the work?
- Will a fuel cell be required?
- Are there enough fire extinguishers, first aid kits and spill kits on site?
- Is the site in a high crime area?
- Is there an adequate storage space on site?
- Is there any form of security on site, if so, what?

ADDITIONAL REQUIREMENTS

- Only properly trained workers are to use tools, equipment, and vehicles.
- Inspect all tools, equipment, and vehicles prior to use.
- For vehicles and equipment, daily inspections consist of performing a Pre-Trip Inspection (circle check).
- When applicable, maintenance schedules for all tools, equipment, and vehicles are to be respected.
- Each jobsite Foreman/Superintendent is to ensure weekly inspections of all tools, equipment, and vehicles on the jobsite. Inspections are to be completed using the SiteDocs app.
- The inspection should assess the condition of the tools, equipment and vehicles and take any action required. Action can include such things as putting air in the tires, adding fluids, or removing them from service.

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- If any worker judges that any tool, equipment, or vehicle is unsafe for use, they are to properly tag the item (tools must be tagged out of service) and inform the Foreman/Superintendent immediately.
- Tools, equipment, or vehicles that are tagged unsafe shall be either repaired immediately or removed from service.
- Tools, equipment, or vehicles that are overdue for service or maintenance must not be used. Overdue equipment shall be tagged unsafe, shall be either repaired immediately, removed from service, and arrangements made for the equipment to be taken back to King Truck & Equipment Repair for service or maintenance.

EQUIPMENT/TOOLS MAINTENANCE LIST

A list of tools, equipment, and vehicles along with written maintenance procedures will be established.

Refer to Safe Work Practices – tool use and maintenance.

The annual list of equipment will be verified at the end of each season by a designated management team.


OPERATOR TRAINING AND QUALIFICATIONS

All individuals who operate mobile equipment, forklifts, vehicles etc. will have the appropriate skills, accreditation and/or certification. This applies to both company workers and contracted equipment services.

Only competent and qualified technicians/inspectors will perform inspections and/or repairs required.

Operators will be trained in the following:

- Their responsibilities to ensure they operate the equipment in a safe manner.
- Familiarity and comprehension of safety requirements for the piece of mobile equipment which they operate.
- Manufacturer's operating and typical maintenance procedures.
- How to communicate to maintenance personnel when there is a problem with a specific piece of equipment.
- Hand signals and/or other requirements set by the manufacturer, the company or dictated by site conditions.

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ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Management of Change Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Management of Change Program
- Purchase and maintain equipment as required, minimum maintenance will be as per manufacturer's guidelines.
- Ensure that maintenance program is being completed as required and records are available.
- Ensure that all personnel meet the requirements of the Documents and Records Policy and procedure.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.
- Senior Management will review deficiencies and take actions to correct identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Complete appropriate training regarding roles and responsibilities for jobsite compliance of the Management of Change Program.
- Ensure drivers/operators complete daily pre-use inspection on equipment and vehicles.
- Workers complete a pre-use inspection of tools prior to use.
- Ensure subcontractors follow the pre-use inspection guidelines on the jobsites.
- Ensure that the manufacturer's manuals are provided with all rental equipment over 10HP, and onsite management is aware of maintenance requirements for the equipment.
- Be aware of any vehicle/equipment deficiencies and ensure it is recorded on the SiteDocs app. Any critical repairs must be communicated directly to the trucking & equipment superintendent who will then decide where the repairs should be made (i.e., third-party company) and arrange for immediate service.
- Ensure all workers are operating/using the tools, vehicles, and equipment for the correct intended use as per the manufacturer's guidelines.
- Keep abreast of when the equipment on site requires service or maintenance based on the maintenance schedule.
- Ensure any tools that have been tagged "out of service" are repaired or replaced and recorded on SiteDocs.
- Complete the new tool/equipment purchase form on SiteDocs so it can be added to the equipment list upon receipt of the new equipment.
- Complete the annual end of season inventory check list with management.
- Ensure that any tools, vehicles, and equipment are operated by competent workers only. Verify that the worker has the required training to operate specific pieces of equipment such as forklift etc. Certification shall be verified before allowing workers to operate specialty equipment.
- Ensure anyone driving a commercial vehicle has a minimum of a class "G" driver's license.

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- Ensure that the maintenance program is completed; all units requiring maintenance.
- Provide onsite training for the safe operation, storage and maintenance of any new equipment brought to the jobsite.
- Record any training for new equipment using the SiteDocs app.
- Only allow competent technicians to perform service work on vehicles and equipment.
- Complete a monthly review to ensure adherence to the maintenance equipment matrix.

Workers will:

- Understand, acknowledge, and comply with the company's Management of Change Program.
- Maintain their individual training records for specialized pieces of equipment such as a forklift etc.
- As part of their responsibility, complete pre-inspection of tools, vehicles, and equipment prior to use.
- Report any deficiencies immediately to their immediate supervisor and/or their JHSC reps.
- Not operate any tool, vehicle or piece of equipment that is not operating as per manufacturer's guidelines.
- Not remove any type of safety guards or modify the unit without permission.
- Not perform any type of repair without permission to do so.
- Keep all vehicles and equipment free of garbage and debris (e.g., mud) during and at the end of their shift.
- Complete training on how to perform the required pre-use inspections on tools, vehicles, and equipment.

Equipment Rental Companies will:


- Ensure that only certified technicians complete repairs on the vehicles/equipment.
- Ensure that the required maintenance records are completed and kept on file for a minimum of five years.
- Follow up with the Foremen/Superintendents on all maintenance requests when they are completed or when there are delays.
- Ensure the required documentation has been provided in all CVOR vehicles.
- Ensure that the field is notified of the required maintenance to be performed as per the manufacturer's guidelines.
- Ensure all CVOR vehicles and trailers have annual inspections completed as required.
- Advise Superintendents of any type of abuse including poor housekeeping noticed during regular service maintenance.
- Provide reference paperwork in each vehicle on how to complete inspections for CVOR vehicles.

Subcontractors will:

- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health & Safety agreement.

Joint Health & Safety Committee members will:

- Work together with workers and management to review the Management of Change Program annually and make recommendations for continuous improvements.

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- Re-enforce compliance with the Management of Change Program in the workplace.
- When completing the monthly inspections, report any worker to site management for failing to comply with this policy.

Health & Safety Department will:

- Ensure that the program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through any of the following: Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from workers.
- Review and advise on the audit results and findings.
- Assist in revisions to the program, as required.
- Keep abreast of the updated legislation with regards to OHSA standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Provide training to management and workers on the proper use, care and maintenance of PPE and other safety devices.
- Complete required training to maintain program certification required to instruct training courses.

TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

Certification training will be provided by competent and qualified third-party providers.


The Health & Safety Department will request a copy of the trainer's certification for the course being provided.

Training records shall be maintained for workers involved in preventative maintenance program training.

The records will contain the name of the worker trained, date of training and the signature of the person who conducted the training and expiry date.

Training records shall be maintained by the Health & Safety Department and recorded on SiteDocs.

Any training that does not have a standard expiration date will be considered valid for three years. Awareness training will be provided on an ongoing basis and considered to be valid for a period of three years. More frequent training may be required if deemed necessary.

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COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Geotab reports
- Service reminders
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

Occupational Health and Safety Act Construction and Industrial Regulations

HSMS 5-01 Company Rules Policy

HSMS 2-01 Hazard Assessment, Analysis and Control

HSMS 3-05 Controls

HSMS 3-01 Safe Work Practices

HSMS 3-02 Safe Work Procedures

HSMS 8-01 Training and Communication

HSMS 8-02 Health and Safety Orientation Policy


HSMS 8-04 Networking and Peer Learning

Personal Protective Equipment Program

Owners/Maintenance Manuals

HSMS 1-03 Documents and Records Policy and Procedure

Company Preventative Maintenance Matrix

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General Safety Rules and Regulations

Service Ontario Driver's Abstract

Ministry of Transportation of Ontario

Driver's CVOR Logs

Vehicle Pre-Trip Inspection – All Company Vehicles form (HSF 9.8)

Operator's Daily Pre-Shift Inspection form (HSF 9.3)

Hazard Assessment forms (JSF 2.1, 8.0, 2.2)

Schedule 1 Inspection Checklist

CONTINUOUS IMPROVEMENT

This policy and process for the Management of Change Program will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the preventative maintenance program meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Occupational Health Policy	Issue Date: February 1, 2021	
	Revision Date: February 18, 2025	
Policy Number: HSMS 15-01	Revision Number: 005	
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POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, subcontractors, and visitors. The purpose of this policy is to provide written guidelines for identifying and controlling health hazards in the workplace and essential to maintaining the health and safety of our employees.

King Paving & Construction Ltd. recognizes the benefits of a healthy workforce and encourages and supports workers in achieving ownership for their physical, mental, and emotional well-being, resulting in improving overall health and wellness.

SCOPE AND REGULATION

This policy pertains to any workers, visitors, subcontractors, and service providers that work for King Paving & Construction Ltd. that may be exposed to occupational health exposures.

The policy will outline the several types of health hazards that workers may be exposed to during regular work activities. Each specific type of occupational hazard listed will also provide identification of the hazard and control measures to prevent or treat the hazard if accidental exposure occurs. The Company will complete a risk assessment for occupational health hazards and provide controls to reduce the level of risk exposure to workers.

- Occupational Health and Safety Act
- Ministry of Labour
- Reg. 1101
- WSIB Form 82
- WHMIS/SDS
- Ministry of the Environment


DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the Company to whom the Subcontractor is providing services for (e.g., King Paving & Construction Ltd.).

Occupational Health – Means all aspects of health and safety in the workplace and has a strong focus on primary prevention of hazards. The health of the workers has several determinants, including risk factors at the workplace leading to cancers, accidents, musculoskeletal diseases, respiratory diseases, hearing loss, circulatory diseases, stress related disorders and communicable diseases and others.

Occupational Disease – An occupational disease is any chronic ailment that occurs as a result of work or occupational activity.

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Competent Person – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance,
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge of any potential or actual danger to health or safety in the workplace.

Supervisor – Means a person who has charge of a workplace or authority over a worker.


Qualified Person – Is deemed to be qualified due to training and experience with the inspection and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

Worker – A person who performs work or supplies services for monetary compensation. Other persons who work or provide services to an employer for no money, who may be prescribed by regulation includes an unpaid intern, co-op students, and certain other learners.

Occupational Health Policies and Procedures:

To ensure a safe work environment for all personnel, the following Occupational Health and Safety policies and procedures have been developed and are included in the health & safety program manual. This manual is located at the head office and site trailers:

- HSMS 11-08 Pandemic Preparedness Policy
- HSMS 13-08 WHMIS Policy
- HSMS 13-09 Confined Space Policy and Procedures
- HSMS 15-01 General Occupational Health Policy
- HSMS 15-02 Hearing Conservation Policy
- HSMS 15-03 Environmental Policy
- HSMS 15-04 Lead Policy
- HSMS 15-05 Silica Policy
- HSMS 15-06 Asbestos Policy
- HSMS 15-07 Cold Stress Policy and Procedures
- HSMS 15-08 Heat Stress Policy and Procedures
- HSMS 15-09 Hazardous Noise Policy
- HSMS 15-10 Biohazardous Wastes and Sharps Policy and Procedures
- HSMS 15-11 Hazardous Substances & PCB Policy
- HSMS 15-12 Animal and Insect Bites Policy and Procedures
- HSMS 15-13 Animal Droppings Policy
- HSMS 15-14 Mold Policy
- HSMS 15-15 Man made Vitreous Fibres (MMVF) Policy and Procedures
- HSMS 15-16 Musculoskeletal Disorders Policy and Procedures
- HSMS 15-17 Back Care Policy
- HSMS 15-18 Sanitation, Hygiene and Lunchroom Cleaning Policy and Procedures
- HSMS 15-19 High Bacteria in Standing Water and Sewers Policy and Procedures
- HSMS 15-20 Poisonous Plants Policy

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HSMS 15-21 Fatigue Management Policy and Procedures

HSMS 15-22 Mental Health Policies and Procedures


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Occupational Health Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Occupational Health Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Complete the pre-job hazard analysis prior to commencing work and communicate the information to the workers.
- Be familiar with the occupational health policies and procedures.
- Ensure that workers use the methods, procedures and equipment required by OSHA and all regulations.
- Ensure that workers use or wear equipment, protective devices, or clothing that is required by the employer.
- Advise workers about actual or potential health and safety concerns.
- Give workers written instructions on the measures and procedures to protect themselves, when required. Ensure SDS binders are available to all workers and emergency response personnel on jobsites.
- Take every precaution reasonable to protect the workers.
- Supervise workers personally or have an assistant, who is a competent person do so.
- Inspect the workplace, equipment, and tools weekly.
- Ensure all required postings are available in the construction trailers or Health & Safety binders.
- Maintain a Company provided logbook with daily entries as to work activities, performance management or health and safety concerns.
- Complete weekly toolbox talks, and other training material as directed or required for site specific.
- Prepare a site emergency plan. This plan must be communicated to all workers and discussed at the JHA.
- Take progressive disciplinary measures for workers and subcontractors who are not meeting the legislative standards.
- Complete assigned training to assist in the identification, developing controls and monitoring of occupational health concerns on the jobsites.

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Workers will:

- Comply with the health and safety legislation.
- Be familiar with the occupational health policies and procedures.
- Never use or operate equipment in a way that could put yourself or other workers in danger.
- Never remove or make ineffective any protective devices.
- Select worker representatives for the JHSC.
- Report any violations of the OHSA, any defective equipment, or any workplace hazard to the employer or supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Never engage in horseplay on site. Includes, but not limited to the following: pranks, competitions, showing off your strength, roughhousing or unnecessary running.
- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures. Refer to the SDS binder whenever handling chemicals.
- Participate in any training for occupational health concerns provided by the Company.

Health & Safety Representatives will:

- Be familiar with the green book, emergency procedures and work refusal procedures.
- Be familiar with the occupational health policies and procedures.
- Inspect the project at least once a month.
- Make recommendations or report findings about hazards to the employer.

Subcontractors will:


- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health & Safety Agreement.
- Be familiar with the pertinent occupational health policies and procedures.

Joint Health & Safety Committee members will:

- Identify actual and potential hazards in the workplace.
- Be familiar with the occupational health policies and procedures.
- Inspect the workplace at least once a month or if that is not practical inspect part of the workplace in accordance with a schedule agreed upon by the committee and the employer.
- Makes recommendations to the employer about health and safety in the workplace.
- Report any occupational health concerns to their immediate supervisor immediately.
- Is composed of an equal number of worker and employer representatives.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.

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- Update, revise and communicate the occupational health policies and procedures as required.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through, but not limited to, Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Attend training courses to keep abreast of new requirements for the management of the occupational health program.
- Keep abreast of the updated legislation regarding OHS standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Prepare field safety material as required.

TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

Training records shall be maintained for employees involved in all aspects of legislative compliance.


The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

Safe work practices and procedures will be provided to all workers through toolbox talks and onsite training sessions.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

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Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

IHSA Construction Manual

Occupational Health and Safety Act Construction and Industrial Regulations

Safe Work Procedures

Safe Work Practices

General Safety Rules and Regulations

Emergency Response Checklist

Posted Material Checklist

Progressive Discipline Form

CONTINUOUS IMPROVEMENT

This policy and process for legislative program will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the legislative maintenance program meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

Hearing Conservation Program	Issue Date: August 9, 2017	
	Revision Date: February 18, 2025	
Policy Number: HSMS 15-02	Revision Number: 008	
	 <i>Approved By: President</i>	

POLICY STATEMENT

This policy outlines the hearing conservation program for King Paving & Construction Ltd.

These procedures are in accordance with the Occupational Health and Safety Act R.S.O. 1990 c.0.1 Reg. 381/15 Noise.

A risk assessment is required to identify problem areas and establish the standards for recognizing, assessing, and controlling noise.

A study of prior noise information including injury records where noise could be a contributing factor, review of moving equipment that hearing instructions were a contributing factor, hearing loss claims, or workers complaints will be reviewed as part of the risk assessment.

SCOPE

This policy pertains to all workers, subcontractors and visitors that enter or work on any of our jobsites or workplace locations.

Noise exposure represents the most common health hazard at King Paving & Construction Ltd. Overexposure to noise can result in symptoms ranging from annoyance and loss of productivity to irreversible hearing loss and other permanent health effects.

This program provides information on the hazards, risk factors and regulatory requirements associated with exposure to noise, as well as the practices and procedures specific to the conservation of hearing at King Paving & Construction Ltd.

DEFINITIONS

For this policy, the following definitions will be used.


Attenuation – Means a reduction in sound pressure level incident upon the ear.

dBA – Means a measure of sound level in decibels using a reference sound pressure of 20 micropascals when measured on the A-weighting network of a sound level meter.

Decibel – Means a unit of measurement of sound pressure level that is equal to 20 times the logarithm to the base 10 of the ratio of the pressure of a sound, divided by the reference pressure of 20 micropascals.

Sound Exposure Level – Is determined in accordance with the formula:

$$L_{\text{eq}} = 10 \text{ Log}_{10} \left(\frac{\left[\sum_{j=1}^n (t_j \times 10^{0.1 \text{ SPL}_j}) \right]}{8} \right)$$

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HEALTH AFFECTS OVERVIEW

Sound and Noise

Sound is defined as vibration transmitted through a fluid (i.e., gas or liquid), capable of being detected by the human organs of hearing. Sound pressure is the scientific term for the measure of energy exerted by pressure waves in air on the human ear. Noise is defined as unwanted sound pressure. Therefore, for the purposes of this program, the terms 'noise' and 'sound pressure' are equivalent and are used interchangeably.

Variations in air pressure that enter the ear cause the eardrum (tympani) to deflect and rebound. This energy is transferred to the small bones (ossicles) of the middle ear which act as connected levers that exert pressure on the cochlear wall of the fluid-filled inner ear, which in turn results in a pressure wave of cochlear fluids that cause movement of fine hair (cilia). The movement of these cilia sends electrochemical signals down sensory neurons to the brain stem, which leads to the neurological sensation of sound.

Health Effects


Damage to the cilia is a major cause of hearing loss. As we age, cilia become damaged or fall out, leading to a decrease in both the range of pitch and sensitivity to pressure changes. The natural aging process of the ear and the resulting hearing loss is referred to as presbycusis. The cilia can also be affected by subjecting them to excessive sound pressure, which can lead to permanent, irreversible damage, referred to as Noise Induced Hearing Loss (NIHL). NIHL is the basis of occupational exposure limits to sound pressure. The resulting permanent decrease in sound pressure sensitivity is referred to as Permanent Threshold Shift (PTS). In addition to NIHL, other health effects associated with exposure to excessive sound pressures include sleep disturbance, hypertension, and ischemic heart disease.

REGULATORY REQUIREMENTS

The following is a summary of prescribed requirements under Ontario Regulation (O. Reg.) 381/15 – Noise, made under the Occupational Health and Safety Act that are relevant and specific to the assessment and control of exposure to noise at King Paving & Construction Ltd.:

Duty to Protect Workers

2. (1) Every employer shall take all measures reasonably necessary in the circumstances to protect workers from exposure to hazardous sound levels.
- (2) The protective measures shall include the provision and use of engineering controls, work practices and, subject to subsection (5), hearing protection devices.
- (3) Any measurement of sound levels in the workplace that is done in order to determine what protective measures are appropriate shall be done without regard to the use of hearing protection devices.
- (4) Without limiting the generality of subsections (1) and (2), every employer shall ensure that no worker is exposed to a sound level greater than an equivalent sound level of 85 dBA, L_{ex} for an eight-hour shift.

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(5) Except in the circumstances set out in subsection (6), the employer shall protect workers from exposure to a sound level greater than the limit described in subsection (4) without requiring them to use and wear hearing protection devices.

(6) Workers shall wear and use hearing protection devices appropriate in the circumstances to protect them from exposure to a sound level greater than the limit described in subsection (4) if engineering controls are required by subsections (1) and (2) and,

- (a) are not in existence or are not obtainable;
- (b) are not reasonable or not practical to adopt, install or provide because of the duration or frequency of the exposures or because of the nature of the process, operation or work;
- (c) are rendered ineffective because of a temporary breakdown of such controls; or
- (d) are ineffective to prevent, control or limit exposure because of an emergency.

(7) Where practicable, a clearly visible warning sign shall be posted at every approach to an area in the workplace where the sound level, measured as described in subsection (3), regularly exceeds 85 dBA.

Resources Required:


- NRR 32 Ear Plugs
- NRR 30 Ear Muffs
- Safety Orientation
- Safe Work Procedures for P.P.E. (Located in part 1)
- Training on the selection, use, care and storage of P.P.E.
- Knowledge of Ontario Regulation (O. Reg.) 381/15 – Noise (Listed above)

TRAINING

All workers who are potentially exposed to noise sources at or above 80 dBA are required to participate in the hearing conservation training program.

The content of the program shall include but not be limited to the following general and workplace-specific elements:

- Health hazards and potential risks of exposure to noise.
- Nature of noise exposure, i.e., tasks, procedures, equipment, processes, unit operations and areas which could result in noise overexposure.
- Noise assessment techniques.
- Control of noise exposure, including engineering, administrative, and hearing protective devices.

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- Selection and use of hearing protective devices.
- Overview of this Hearing Conservation Program.
- Audiometric procedures, handling of confidential information and records, communication, and follow-up.

Training shall be conducted as part of the worker orientation process, with follow-up refresher training conducted when there are significant changes to the Hearing Conservation Program or related procedures, or the source(s) or potential exposure pattern of elevated noise levels at King Paving & Construction Ltd.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Health & Safety Day
- Safety communication board postings
- Employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks

RISK ASSESSMENTS

Exposure Limits

Permissible exposure to noise at King Paving & Construction Ltd. are regulated under O. Reg. 381/15. Specifically, worker exposure to noise must not exceed a sound pressure level of 85 dBA when averaged over an eight-hour period. This is also known as the criterion level, which forms the basis of all occupational exposure limits for noise. The criterion level is the maximum permissible sound pressure level when averaged over an eight-hour period. The American Conference of Governmental Industrial Hygienists (ACGIH) refers to the criterion level as the threshold limit value (TLV) for noise.

Noise exposure risk is dose-related, where $Dose = (Exposure\ Level) \times (Duration)$. Therefore, as sound pressure levels increase above the criterion level, the maximum allowable exposure period must be decreased accordingly. The amount of time that the exposure period must be decreased when the sound pressure level is doubled is called the exchange rate.

The criterion level and exchange rate are the defining factors in determining permissible noise exposure levels. Permissible exposures to continuous or intermittent noise under O. Reg. 381/15 are based on a criterion level of 85 dBA and an exchange rate of 3 dBA. This translates to the following table of permissible exposures:


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Table 1: Maximum Permissible Exposures to Noise

Average Sound Level (dBA)	Maximum Exposure Duration (hours)
82	16
83	12
84	10
85	8
88	4
91	2
94	1
97	0.5
100	0.25

In addition to the above criteria, no employee shall be exposed to impulse or impact noise above 140 dBA.

Adjustment for Extended Shifts

There are two conventions for determining permissible exposures to noise for extended shifts. The standard work shift at King Paving & Construction Ltd. is 10 hours, which has a corresponding maximum permissible average sound pressure level of 84 dBA. However, in assessing an employee's exposure to noise by dosimetry (see Section 5.2.2 below), the resulting data will provide the average sound pressure level of a dosimeter run in the following two formats:


LEQ – The sound pressure level averaged over the exact duration of the dosimeter run.

LEX – The sound pressure level averaged over the run duration that is then recalculated as an equivalent average sound pressure level over eight hours.

It is not practical to deploy a noise dosimeter over a period of exactly 12 hours. Therefore, the use of **LEX** is preferred, since it allows a direct comparison of the dosimeter output to the eight-hour permissible criterion level, regardless of the duration of the dosimeter run. However, the use of **LEX** requires that dosimetry be performed over a period that is representative of the entire shift, which requires a dosimeter run duration greater than nine hours to be representative of a ten-hour shift.

SELECTION CRITERIA FOR HEARING PROTECTION

- (1) A hearing protection device shall be selected having regard to,
- (a) sound levels to which a worker is exposed
 - (b) the attenuation provided by the device

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(c) the manufacturer's information about the use and limitations of the device.

(2) A hearing protection device shall be used and maintained in accordance with the manufacturer's instructions.

NOISE ASSESSMENT GUIDELINES

Noise measuring instrumentation must conform to one of the following standards:

ANSI S1.4-2014 – Electroacoustics – Sound Level Meters

IEC 61672: 2013 – Electroacoustics – Sound Level Meters

Sound Pressure Level Measurements

Sound pressure level measurements are conducted for the following reasons:

- As a preliminary indicator of exposure risk and to assist in the classification of similar exposure groups (SEGs) that require noise dosimetry.
- To define areas or zones where specific control measures are required (e.g., signage, mandatory use of hearing protection).
- To identify and characterize significant sources of sound energy.
- To provide feedback on the effectiveness of engineering controls.

Sound pressure level measurements must be conducted with a Type/Class 2 sound level meter operating under the following settings and conditions:


- Slow response (i.e., one second integrating time constant) for continuous or intermittent noise.
- Fast or peak-hold response (i.e., 35 millisecond or less integrating time constant) for impulse or impact noise.
- A-weighted network for continuous or intermittent noise sources.
- C-weighted network for impulse or impact noise sources.

After establishing the correct instrument settings, the sound level meter is used by holding the device at arm's length and orienting the microphone in the direction and at a known distance from the noise source.

The sound level meter should not be placed on a hard surface where it may be subject to direct transfer of vibrational energy, which in turn may lead to a positive bias (error).

Sound level meters are designed to permit screw mounting onto a tripod, which should be used when not conducting measurements by hand.

The sound level meter must be recalibrated in accordance with the manufacturer's instructions to confirm acceptable performance with respect to frequency, amplitude linearity, time response, distortion and phase match.

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Manufacturers typically recommend that sound level meters be subjected for full recalibration every 12 to 24 months.

NOISE ASSESSMENT GUIDELINES

Noise Dosimetry

Full shift assessments of employee exposures to sound pressure level are conducted with Type/Class 2 noise dosimeters that are programmed for the following points:


- Criterion level of 85 dBA
- Exchange rate of 3 dBA
- A-weighted network
- Lower threshold of 74 dBA or lower
- Upper limit of 130 dBA

The following are procedures to be followed for the deployment of noise dosimeters:

- Ensure the dosimeter is fully charged and properly programmed (i.e., criterion level, exchange rate, lower threshold, upper limit).
- Turn on the dosimeter and leave in 'standby' mode until properly attached to the employee's collar bone or upper lapel region – ensure that the subject will not cover the device with outer clothing after deployment.
- Once in place, active to 'run' mode – starting a run before attaching the dosimeter to the employee will result in artifact (false) sound pressure readings resulting from physical disturbance of the microphone.
- Strive for continuous, uninterrupted data collection over as much of the entire shift as possible to be representative of full shift exposures.
- Upon completion of the run, switch to 'standby' mode before removing the dosimeter from the employee.
- Record the following summary data (Serial #, Run Time, L_{EX}, L_{EQ}, L_{MAX}, %Pd_{ose}) before turning off.

There are specific observations and other qualifying data that must be collected to validate and interpret noise dosimetry results for risk assessment purposes. These results must be recorded and attached to the dosimeter histograms and appropriately recorded/stored:

- Name of subject employee
- Date/shift
- Dosimeter serial number
- Programmable settings of the dosimeter
- Relevant environmental conditions (temperature, air currents/wind speed)
- Relevant mitigating workplace factors (operating or idle machinery or equipment, significant sources of vibration, equipment, or production downtime, etc.)
- Name of IH technician

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AUDIOMETRY

Audiometric testing must be performed on a pre-placement basis, and on an annual basis for all employees who routinely work in an environment where sound pressure levels are anticipated to exceed 80 dBA.

CONTROLS

Engineering Controls

Engineering controls for noise exposure start at the design stage of plant and equipment and with the decision to purchase machinery. This is the most cost-effective point at which to implement effective controls. The design and acquisition of plant and machinery should continuously strive to reduce exposure to noise through effective engineering and a 'buy quiet' policy.

The following are engineering controls that should be considered for application to reduce hazardous noise:

- Installation of inlet and outlet silencers on ventilation fans.
- Purchase equipment with effective sound dampeners or mufflers.
- Installation of noise dampening foam or paneling.
- Installation of anti-vibration mounts and flexible couplings to prevent transmission of moving parts.
- Mounting of motors and pumps on anti-vibration mounts.
- Installation of enclosures around noisy machinery or workstations.

HEARING PROTECTION


The hierarchy of controls applies to noise, as with other hazardous agents in the workplace. As such, engineering controls (fan silencers, vibration dampeners, isolation, etc.) and administrative controls (limited exposure duration) are the required methods for noise reduction.

However, hearing protection (in the form of earmuffs and/or plugs) may be required to further reduce exposure to acceptable levels, after the implementation of all reasonable and practicable engineering and administrative controls.

The predominant indices of noise reduction effectiveness of hearing protection devices (HPDs) are the U.S. Environmental Protection Agency Noise Reduction Rating (NRR) number assigned to the HPD.

The NRR is a value that is subtracted from the sound pressure level in the work environment to obtain the resulting theoretical exposure level of the worker who is wearing the HPD. For example, if a worker wears hearing protection with a NRR of 28 in a work environment with a sound pressure level of 103 dBA, then his/her theoretical exposure level is (103-28) or 75 dBA.

However, the NRR for HPDs is generated by the manufacturer through tightly controlled laboratory test procedures and represent conditions of optimal performance. Under practical application conditions, HPDs consistently underperform the assigned NRR value.

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The following NRR adjustment factors are to be used for the determination of both single and double hearing protection:

Single Hearing Protection

For A-weighted measurements: actual dBA = unprotected dBA – (NRR – 7)

For C-weighted measurements: actual dBA = unprotected dBC – NRR

Double Hearing Protection

For A-weighted measurements: actual dBA = unprotected dBA – (NRR_{HIGHER} + 5 – 7)

For C-weighted measurements: actual dBA = unprotected dBC – (NRR_{HIGHER} + 5)

(Where NRR_{HIGHER} is the manufacturer's NRR value of the more protective device)

SIGNAGE REQUIREMENTS

As a prescribed requirement under O. Reg. 381/15, where practicable, a clearly visible warning sign shall be posted at every approach to a work area, building or other location where sound pressure levels regularly exceed 85 dBA.

The purpose of the signage is to make employees and visitors aware of the risk of exposure to excessive noise, and the required level of hearing protection, as indicated in the following table:


Table 2: Hearing Protection Signage Requirements

Average Sound Level (dBA)	Posting Requirements
Less than 83	No signage requirement
83 to 100	Hearing protection required
Greater than 100	Double hearing protection required

RISK ASSESSMENTS

King Paving & Construction Ltd. shall retain all records that are pertinent to hearing conservation, including but not limited to noise exposure and sound pressure level assessment data, quality control procedures, training requirements and rosters, listing of noise based SEGs and relevant statistics, and the Hearing Conservation Program and procedures.

The records of medical examinations and audiometric assessments of a worker obtained under the requirements of the Hearing Conservation Program shall be kept in a secure location for the longer of:

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- The period of 40 years from the time such records were first made.
- The period of 20 years from the time the last of such records were made, or the closure of the mine.

If medical records can no longer be maintained by the Physician, such records shall be surrendered to the Ontario Workplace Safety and Insurance Board (WSIB).

Listed below are the approximate noise levels for equipment that is commonly used in construction. Please keep in mind that newer equipment tends to produce lower levels of hazardous noise.


Typical Noise Measurements for Construction

* EQUIPMENT	NOISE LEVEL (DBA) AT OPERATOR'S POSITION
Cranes	78 – 103
Backhoes	85 – 104
Loaders	77 – 106
Dozers	86 – 106
Scrapers	97 – 112
Trenchers	95 – 99
Compactors	90 – 112
Grinders	106 – 110
Chainsaws	100 – 115
Concrete saw	97 – 103
Sand blasting nozzle	111 – 117
Jackhammers	100 – 115
Compressors	85 – 104

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Hearing Conservation Program.

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- Allocate appropriate resources, training, and employees to implement and maintain the Hearing Conservation Program.
- Provide active support for activities associated with the Hearing Conservation Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensures that the Health & Safety Department implements the necessary audiometry and other medical surveillance procedures and protocols to support the Program.

Foremen/Supervisors/Managers/Superintendents will:

- Communicate objectives, duties, and responsibilities of the Program to employees.
- Ensure that the required procedures are carried out at all operational levels.
- Ensure that employees wear the required hearing protection and undertake audiometric testing as required by the Program.

Workers will:


- Attend the required training to develop an understanding of the requirements and procedures of the Program.
- Carry out the required procedures of the Program.
- Wear the appropriate hearing protection, as required.
- Participate in audiometric testing, as required.
- Provide the Supervisor with feedback and suggestions for improvements to the Program.
- Complete proper care, daily inspection, and maintenance of the Hearing Protection PPE.

Joint Health & Safety Committee members will:

- Work together with employees and Management to identify workplace noise level hazards, exercise appropriate due diligence, and prioritize safety concerns daily.
- Participate in Hearing Conservation training as assigned.
- Ensure proper hearing protection is used when required in the workplace.
- Correct any non-compliance on jobsites found during the inspection process.
- Review the policy on an annual basis and make recommendations to improve the Hearing Conservation Program.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites and workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Be responsible for arranging the re-calibration of the sound meter as per manufacturer's specifications.

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- Communicate with the external Health Clinic, Joint Health & Safety Committee (JHSC) and different levels of Management to ensure that effective controls are maintained, and medical surveillance and employee notification requirements are carried out.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated.
- Promote feedback and recommendations from employees.
- Review and advise on the interpretation of the results and findings of all Program related assessment activities.
- Conduct a risk assessment of noise-related potential injuries, worker-related claims and any worker complaints.
- Assist in revisions to the Program, as required.
- Keep abreast of the updated legislation with regards to hearing protection through industry education.
- Be responsible for updating the policy on an annual basis.

REFERENCES

American Conference of Governmental Industrial Hygienists (ACGIH, 2017). *TLVs® and BEIs® Based on the Documentation of the Threshold Limit Values for Chemical Substances and Physical Agents & Biological Exposure Indices*.

CAN/CSA Z107.56-13 – Procedures for the Measurement of Noise Exposure

CAN/CSA Z94.2-14 – Hearing Protection Devices – Performance, Selection, Care and Use

CAN/CSA Z1007-16 – Hearing Loss Prevention Program Management

ANSI S1.4-2014 – Electroacoustics – Sound Level Meters

IEC 61672: 2013 – Electroacoustics – Sound Level Meters


CONTINUOUS IMPROVEMENT

This policy and process for the Hearing Conservation Program will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the Hearing Conservation Program meets the provincial Occupational Health and Safety Act and other governing legislation.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

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An action plan is to be created based on the results of the standard evaluation. Action plan will identify the gap, action to be completed, who will be responsible to complete the action and the timeframe for completion.

Records of the action will be identified on the Continuous Improvement Plan and reviewed by Senior Management on a quarterly basis.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy	OHSA regulation new standard	Aug 10, 2017	000
Policy updated to meet Safety Group requirements	New standards for Safety Group	Nov 15, 2017	001
Update policy	Annual review & company name change	Oct 17, 2019	002
Update policy	Annual review	Feb 13, 2020	003
Update policy/Added section indicating the average noise produced by various equipment used in construction/Removal of Safety Group Reference	Annual review	Jan 18, 2021	004
Update policy Cleaned up wording	Annual review	Jan 18, 2022	005
Update policy	Annual review	Jan 18, 2023	006
Update policy Added Required Resources Section	Annual review	Jan 18, 2024	007
Annual Review, corrected grammatical errors	Annual review	February 18, 2025	008

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POLICY STATEMENT

The Management of King Paving & Construction Ltd. is committed to the protection and enhancement of the environment. It is our aim to reduce the environmental impact of our business and to operate in an environmentally responsible manner.


SCOPE AND REGULATIONS

This policy pertains to all workers, subcontractors, service providers, and visitors at all work locations of King Paving & Construction Ltd.

The *Environmental Protection Act* and its regulations, and local municipal by-laws apply to King Paving & Construction Ltd. and their Subcontractors. Daily operations may impact the environment via air emissions, chemical storage, fuel storage, vehicle usage, and hazardous waste, use of ozone-depleting substances, hazardous material spills and sewer discharges. The law requires that King Paving & Construction Ltd. and their subcontractors conduct their business with due diligence (i.e., with all reasonable care being taken).

DEFINITIONS

- Contaminant:** Any solid, liquid, gas, odour, heat, sound, vibration, or radiation resulting from activities that may cause adverse effects on people, property, or the natural environment.
- Discharge:** Includes any addition, deposit, emission, or leak.
- Environment:** Surroundings in which an organization operates including air, water, land, natural resources, flora, fauna, humans, and their interaction. Surroundings extend from within the organization to the global system.
- Environmental Audit:**
- The assessment of environmental performance against applicable laws, regulations, institutional policies, and operational procedures to provide evidence and assurance about essential due diligence.
- Environmental Impact:**
- Any change in the environment whether adverse or beneficial, wholly, or partially resulting from an organization's activities, products or services.
- Environmental Program:**
- A strategy to attain environmental goals. The program should identify:
- fundamental environmental goals
 - environmental liabilities

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- compliance strategies, including environmental auditing, monitoring, record keeping, abatement and waste minimization initiatives.

Pollutant: Any solid, liquid, gas and/or odour resulting directly or indirectly from activities that:


- impair the quality of natural environment.
- injure or damage property, plant, or animal life.
- harm or materially discomfort any person.
- adversely affects health and impairs the safety of any person.
- render any property, plant, or animal life unfit for use.
- cause the loss of enjoyment of the normal use of property; and/or
- interfere with the normal conduct of business.
- A pollutant also includes any substance from which such solid, liquid, gas and/or odour is derived.

Spill: A discharge of a pollutant made into the natural environment, which is the air, land, or water of Ontario, from or out of a structure, vehicle or other container, that is abnormal in quality or quantity considering all the circumstances of the discharge.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Environmental Policy and Program.
- Be responsible and accountable to protect the health and safety of themselves, all workers, and people in their work environment.
- Allocate appropriate resources, training, PPE, and workers to implement and maintain the Environmental Policy and Program.
- Provide active support for activities associated with the Environmental Policy and Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.
- Ensure that the Health & Safety Department implements the necessary procedures and protocols to support the program.

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Foremen/Supervisors/Managers/Superintendents will:

- Be responsible and accountable to protect the health and safety of themselves, all workers, and people in their work environment.
- Ensure that precautions are in place at sites where the work may impact on the environment.
- Report events that may have potential negative impact on the environment to the proper authorities.

Workers will:

- Be responsible and accountable to protect the health and safety of themselves, all workers, and people in their work environment.
- Follow the procedures listed in the Environmental Policy & Procedures to minimize the risks to the environment.
- Report unsafe acts and conditions to their supervisor immediately.

PROCEDURES & PROTOCOLS


This Policy is communicated and made available to all company workers, subcontractors, members of the public and other interested third parties.

- A greener and cleaner environment for all
- Prevention of pollution in all areas of our operation
- A programme of continual improvement in everything we do
- Keeping ourselves aware of and compliant with, all current and future legislation
- Reduced use of natural resources
- Minimize waste and maximize recycling/reuse

Recycling and re-use of materials will be carried out where possible and where not, due care will be exercised in respect of waste disposal in accordance with current guidelines and legislation.

General

1. Employees and Subcontractors shall become familiar with applicable job-related environmental legislation and shall conduct business in an environmentally responsible manner.
2. No person shall discharge a contaminant into the natural environment and no person responsible for a source of contaminant shall permit a discharge into the natural environment in any amount, concentration, or level, more than that prescribed by the Regulations.
3. Every person who discharges a contaminant or is responsible for a contaminant that discharges into the natural environment, in any amount, concentration, or level more than that prescribed by the regulations, shall forthwith notify the Ministry of Environment about the discharge.

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4. Every person who discharges a contaminant into the natural environment that is likely to cause an adverse effect shall forthwith notify the Ministry.
5. The owner of the pollutant and the person having control of a pollutant that is spilled and that causes or is likely to cause adverse effects shall immediately do everything practicable to prevent, eliminate and ameliorate these effects and to restore the natural environment.

Environmental Due Diligence

1. The Joint Health & Safety Committee, Site Supervisors and Management shall establish systems and contingency plans where necessary to protect the environment and shall see that these systems and plans are effectively operated and maintained.
2. Joint Health & Safety Committee, Site Supervisors and Management shall be trained to respond effectively to environmental occurrences and to report remedial actions to supervisory personnel and government authorities.
3. Significant environmental issues and environmental due diligence initiatives shall be reported to the Joint Health & Safety Committee and the Site Supervisor to promote internal communications and other appropriate actions.


Guidelines

King Paving & Construction Ltd. is committed to preventing pollution by regularly identifying, assessing, managing, and reviewing operational and research activities that may harm the environment. King Paving & Construction Ltd. expects environmentally responsible behaviour from within its organization and from Subcontractors. Site personnel and subcontractors have a duty to report situations of concern to their immediate Supervisors and their Joint Health and Safety Committee member.

The Environmental Protection Act and its regulations, and local municipal by-laws apply to King Paving & Construction Ltd. and their subcontractors. Daily operations may impact the environment via air emissions, chemical storage, fuel storage, vehicle usage, hazardous waste, use of ozone-depleting substances, hazardous material spills and sewer discharges. The law requires King Paving & Construction, and their subcontractors conduct their business with due diligence (with all reasonable care being taken).

Environmental Offences

Under the *Environmental Protection Act*, every person who is convicted of a contravention of the Act or regulations or who fails to comply with an order or requirement of an inspector or director, or an order of the Ministry of Environment is liable to a fine or imprisonment. Individual corporate officers, supervisors, managers, and workers can be charged and found personally liable. King Paving & Construction Ltd. can also be prosecuted. The owner (i.e., Subcontractor) of the pollutant may also be liable for compensation to a third party for loss or damage arising from adverse effects of the spill.

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Employees are secure from reprisals when they report environmental concerns.

SPECIFICS

ENVIRONMENTAL SAFETY STATEMENT

King Paving & Construction Ltd. is committed to leading the industry in minimizing the impact of its activities on the environment.

The key points of its strategy to achieve this are:

- Minimize waste by evaluating operations and ensuring they are as efficient as possible.
- Minimize toxic emissions through the selection and use of its fleet and the source of its power requirement.
- Actively promote recycling both internally and amongst its customers and suppliers.
- Source and promote a product range to minimize the environmental impact of both production and distribution.
- Meet or exceed all the environmental legislation that relates to the Company.
- King Paving & Construction accepts responsibility for the harmful effects its operations have on both the local and global environment and is committed to reducing them.
- The Company will implement a training program for its staff to raise awareness of environmental issues and enlist their support in improving the Company's performance.
- King Paving & Construction will encourage the adoption of similar principles by its suppliers.


1. Introduction

Purpose

Our primary aim is developing and maintaining a first-class environmentally responsible culture within King Paving & Construction Ltd. This is driven by our goal for **zero** pollution incidents which is a key objective within the business.

King Paving & Construction remains focused on developing a positive and proactive environmental culture, not only for our own people, but also for our suppliers and subcontractors.

Caring for the environment is at the heart of all we do. We are not satisfied with mediocrity, and we want to achieve our goal of zero incidents.

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The purpose of this document is intended to provide information to all King Paving & Construction employees on the company's organization and arrangements for environmental management to ensure our impacts are minimized, and to set out management and employee responsibilities to achieve this.

This document has been prepared to define the way King Paving & Construction intends to manage environmental issues, which is summarized as follows:

- To establish an environmental policy that is appropriate to King Paving & Construction.
- To identify the legislative and regulatory requirements relevant to the organization's environmental compliance.
- To identify the environmental aspects (risks) arising from the company's past, existing or planned activities or services determine the environmental significance of these aspects (risk) and introduce control measures to manage environmental impacts.
- To identify priorities and set appropriate environmental objectives and targets.
- To establish a structure, procedures, and program to implement the policy and achieve the objectives and targets.
- To define responsibilities and provide resources for planning, control, monitoring, corrective action, auditing, and review of activities to ensure both that the policy is complied with and that the Environmental Management System remains appropriate.

2. Environmental Policy

King Paving & Construction is fully committed to undertaking our work in a responsible manner that achieves and maintains the highest environmental standards. We appreciate the importance of the environment around us. We are proud that much of our work is delivering projects that improve the environment.


1 Management and Leadership

Senior Management will provide visible leadership in environmental matters and consider the environment as an integral part of the business.

2 Managing Risk

King Paving & Construction will assess our activities to minimize impacts from significant environmental aspects including:

- Waste
- Releases to water
- Contamination of land
- Nuisance and amenity
- Emissions to air

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- Carbon emissions
- Archaeology and local history
- Wildlife

3 Working with Employees

All employees will be actively encouraged to engage in environmental training and awareness programs.

4 Working with Suppliers and Subcontractors

Subcontractors' capability and competence in environmental matters will be assessed and continually monitored.

5 Setting Plans and Targets

Targets will be reviewed and set annually for both leading and lagging environmental measures.

Improvement plans will be developed, implemented, and monitored to support this policy and drive continual improvement.

6 Effective Procedures and Guidance

The environmental management system will be maintained and developed as a comprehensive guide to our people of working practices and procedures.


7 Reporting/Reviewing and investigating

Performance will be reported, measured, and reviewed against targets to identify deficiencies and drive improvement.

Incidents and near misses will be reported and analyzed/investigated to learn lessons and feedback improvements.

8 Effective Assurance via Auditing

- The health & safety officer will carry out regular inspections to check compliance with our management system.
- We welcome audits by customers as an opportunity to learn and improve.

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Statement of intent


To support our environmental policy and objectives we are committed to responsible business practices in the following environmental areas and as such, are developing programs and procedures to improve our performance.

Sustainable procurement policy

The materials we use during our construction projects contribute to our environmental performance and as such we recognize the contribution sustainable materials make to improved environmental performance. We have set objectives to increase the number of recycled materials we use, particularly aggregates in excavation reinstatements.

We are also committed to improving the way we procure other materials such as concrete, timber, vehicles, fuel, utilities, water, and office consumables to ensure they are sourced through responsible organizations that have established processes to validate the materials that have demonstrable environmental credentials. As such we will develop mechanisms to:

- Enhance employee awareness of relevant environmental and social effects of purchases through appropriate training.
- Provide guidance and relevant information to employees to allow them to select sustainable products and services.
- Give preference to products and services that can give value and can be manufactured, used, and disposed of in an environmentally and socially responsible way.
- Work with existing and potential suppliers to investigate and introduce responsible processes and products.
- Ensure that sub-contractor's credentials are considered in the Vendor Assessment process.
- Develop sustainability criteria that can be included in specifications for suppliers, including the following:
 - Health and Safety
 - Environmental protection
 - Quality management
 - Equality & diversity
 - Ethical sourcing – including human and employee rights and competition
 - Ensure that sustainability criteria are considered in the placing of orders.

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3. Planning

Environmental aspects

To mitigate negative environmental risks and promote positive environmental impacts our environmental management system is based on a requirement to identify and evaluate environmental risks and ensure that appropriate controls are implemented.

Corporate environmental risks are reviewed on an annual basis or when new risks are identified by the business. Site management, using corporate risk assessment information, produce site specific risk assessments which identify and control environmental risks arising from business activities.

The King Paving & Construction Safety Officer is available to provide advice to operational management and staff during the planning of new or changes to existing activities.

Legal and other requirements

To ensure compliance, periodic evaluations will be undertaken and recorded by assessing trends from incidents, Health, Safety and Environmental inspections, near miss reports, non-conformances and investigations carried out by internal auditors.

Legal requirements are incorporated into the risk evaluation process to ensure that those environmental aspects with legislative controls are considered significant.

Objective

To ensure improvement in our environmental performance we have established a series of environmental objectives, noted throughout this policy, which are reviewed annually for the organization.

Legal and other requirements


To ensure compliance, periodic evaluations will be undertaken and recorded by assessing trends from incidents, Health, Safety and Environmental inspections, near miss reports, non-conformances and investigations carried out by internal auditors.

Legal requirements are incorporated into the risk evaluation process to ensure that those environmental aspects with legislative controls are considered significant.

4. W.H.M.I.S./G.H.S.

As per our policy and the Ontario Occupational Health and Safety Act, all King Paving & Construction employees and our subcontractors are required to maintain current W.H.M.I.S. training.

In addition, as of June 2015, the standard W.H.M.I.S. labeling system was changed to adopt the new G.H.S. (Global Harmonized System) format.

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Our W.H.M.I.S. program, including training is reviewed on an annual basis and any adjustments or improvements will be made as required.

Our W.H.M.I.S. training program currently includes the following items or topics:

1. An introduction to WHMIS
2. Definition of a controlled product
3. Responsibilities under WHMIS (Supplier, Employer and Worker)
4. Exemptions
5. Classification and description of hazards
6. WHMIS and GHS classifications and pictograms
7. Supplier Labels (WHMIS/GHS)
8. Workplace Labels
9. Placards
10. Workplace Identifiers
11. Material Safety Data Sheet (requirements and accessibility)
12. S.D.S. definitions and chemical properties
13. Personal Protective Equipment
14. Where to find waste handling and spill procedures
15. Review

All personnel are required to write a quiz prior to training permits or certificates are to be issued. The required passing grade is 80%


All sites will be routinely inspected for proper documentation such as training permits, SDS, and any specialized documentation or equipment such as spill kits.

5. CHEMICAL SPILL PREPAREDNESS

By following proper prevention techniques, it is our goal to ensure that chemical spills cannot occur. However, King Paving & Construction is committed to being prepared in the unlikely event of a chemical spill.

OBJECTIVES:

- Explain responsibilities
- Provide strategies to prevent spills
- Assess hazards presented by spills
- Report spills when needed
- Clean-up spills when appropriate

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GENERAL SPILL PREVENTION AND RESPONSE:


The following procedures are to be followed for each job site:

- Supervisors are to ensure that all personnel are aware of the potential hazards of the chemicals that are on site
- All personnel must have quick and easy access to the Safety Data Sheets (SDS) for all chemicals on site. Foremen and Superintendents are to have this information readily available on site
- Spill kits are to be readily available and easily accessible at each job site. King Paving & Construction utilizes the medium and large spill kits based on the requirements of the site
- Spill kits are to be inspected by a trained and authorized person monthly for contents and overall condition and logged onto the SiteDocs inspection report
- All King personnel are to be trained in WHMIS 2015 and are provided training on spill prevention and response. This training is renewed annually
- Foremen and Superintendents are trained in chemical spill response and how to properly use a spill kit
- Foremen are to ensure that all workers who are using or working near chemicals are made aware of the personal protective equipment requirements as listed on the Safety Data Sheet
- Foremen and Superintendents are to ensure that the correct P.P.E. is readily available on site and are to ensure that it is used or worn properly and trained in its use
- All chemical spills must be reported to the foreman, superintendent and health and safety officer immediately
- All spills that may have an environmental impact must be reported immediately to the client, Ministry of Labour, and the Ministry of Environment
- All chemicals must be properly and clearly labeled.
- To minimize the potential for a spill, all chemicals are to be stored properly as per the Safety Data Sheet.
- When planning work for an upcoming site, supervisors are to minimize the amount of chemicals that will be brought on site (only take what you need)
- Spills or release of items such as asbestos, PCB's, lead, and biohazardous products must be responded to immediately by following the King Paving & Construction specific procedures located in the Health and Safety Program Manual

GENERAL WASTE MANAGEMENT:

Good housekeeping and following the specific procedures for waste management leads to a cleaner and safer environment. To this end, King Paving & Construction has instituted the following standards, procedures, and guidelines:

- Supervisors are to ensure that all personnel are aware of the potential hazards of waste and scrap products that may be generated on site
- All personnel must have quick and easy access to the Safety Data Sheets (SDS) for all chemicals on site. Foremen and Superintendents are to have this information readily available on site

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- All King personnel are to be trained in WHMIS 2015 and are provided training on spill prevention and response. This training also includes training on waste and scrap management, control, and response. Training is renewed annually
- Foremen are to ensure that all workers who are using or working near waste or scrap are made aware of the personal protective equipment requirements as listed on the Safety Data Sheet or applicable company policy. Gloves must be worn by workers handling waste.
- Foremen and Superintendents are to ensure that the correct P.P.E. is readily available on site and are to ensure that it is used or worn properly and trained in its use
- Prior to the commencement of work, supervisors are to conduct a hazard assessment that is specific to the site. The assessment must include the generation, management, and control of waste and scrap
- All workers and subcontractors shall ensure that their waste material and debris is removed to a disposal area and reusable material shall be removed to a storage area at least once a day or as often as necessary to prevent a hazardous condition from arising.
- Disposal areas are to be designated by the King Paving & Construction project Superintendent
- The superintendent or project manager is to coordinate waste disposal procedures with the client
- Work areas should be cleaned before, during, and after during a task
- Clean any spills immediately
- Dispose of any unused oil, cleaning supplies, or any other chemical properly in accordance with company policies and procedures listed on Safety Data Sheets
- Supervisors are to ensure that sites good housekeeping practices and procedures are being followed
- All waste and scrap that may have an environmental impact must be reported immediately to the client, the Ministry of Labour, and the Ministry of Environment
- All chemicals must be properly and clearly labeled.
- To minimize the potential for a spill, all chemicals are to be stored properly as per the Safety Data Sheet.
- Waste and scrap items such as asbestos, PCB's, lead, and biohazardous products must be responded to immediately by following the King Paving & Construction specific procedures located in the Health and Safety Program Manual
- Superintendents and foremen are responsible for managing any waste that is generated on the jobsite


RESPONSIBILITIES:

All personnel are responsible for:

- Ensuring spills are reported or cleaned up in a timely manner
- Cleaning up nuisance spills of materials in their area, even if someone else spills them (janitors, service people)
- Knowing the properties of the materials they are working with
- Taking reasonable steps to prevent spills

NUISANCE SPILLS:

Spills of less than 4L of material that you know the hazards of and:

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- Are comfortable cleaning up and that you can clean up
- Assess the hazard
- Wear appropriate PPE
- If you are unsure of the hazard of a spill or need assistance with PPE selection, call the safety officer.

NUISANCE SPILL RESPONSE:


- Alert people in the immediate area of spill
- Wear appropriate protective gloves, goggles, and a long-sleeve shirt
- Avoid breathing vapors from the spill
- Confine spill to small area & absorb on absorbent pads &/or kitty litter
- Clean spill area with soap & water
- Collect all contaminated absorbent, gloves & residues in plastic bag lined garbage can
- Label and dispose of properly

POTENTIALLY HAZARDOUS SPILLS:

- Spills of greater than 4L
- Smaller spills of materials of low LD50
- Carcinogens
- Flammable liquids or metals
- Compounds of unknown toxicity

POTENTIALLY HAZARDOUS SPILL RESPONSE:

- Attend to injured or contaminated people and remove them from the exposure if you can do so without endangering yourself
- Alert people in the immediate area to evacuate
- If spilled material is flammable, turn off heat and ignition sources
- Call the Safety Officer and Superintendent
- If indoors, close doors to affected area
- If there is a risk of environmental contamination, the Ministry of Environment must be notified immediately, as well as the Ministry of Labour.

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BIOLOGICAL SPILLS:

Since King Paving & Construction and our subcontractors do not handle or use materials that can cause biological spills, biological spill responses BSL 1, BSL 2 and BSL 3 do not apply.

RADIOACTIVE MATERIALS:

King Paving & Construction and our subcontractors do not handle or use radioactive materials that can cause a spill; therefore, radioactive spill response techniques do not apply.

ESTIMATING POTENTIAL HAZARDS:

- Research hazards before you use a new chemical
- Consult the Safety Data Sheet
- Consider the toxicity, flammability, physical state, and the amount of the material involved.
- Consider the location of the spill
- Consider your knowledge and skills
- Ask for help in estimating hazards and call the safety officer to see if there are any concerns.


PREVENTING SPILLS:

- Eliminate clutter
- Know proper work practices for biological, chemical materials you use
- Use unbreakable secondary containers
- Store chemicals properly
- Dispose of waste and excess chemicals in a timely manner

DIESEL TANKS:

All diesel tanks that are brought onto worksites must:

1. Be double walled
2. Be inspected for damage regularly
3. Be maintained in good condition
4. Be placed on level ground
5. Be placed in an area where they are protected from vehicle and equipment damage
6. Be clearly labeled
7. Have a spill kit available
8. Be placed on a spill tray if there is the potential of a spill entering a body of water such as a lake, pond, stream, or river.

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GAS AND DIESEL CANS:

All gas and diesel cans (also known as jerry cans) must:

1. Be maintained in good condition
2. Be placed or stored so that they are protected from vehicle and pedestrian traffic
3. Not be stored indoors
4. Be always closed except when being used
5. Never be left with the spouts sticking out
6. Be secured when being transported
7. Be kept away from areas in which there are sparks or open flames
8. Have a spill kit of site

COOLANTS:

Coolants such as ethyl glycol ether are hazardous to the environment, and therefore, should be handled with care. Potential leaks can occur from pipelines, containers, vehicles, and construction equipment.


Leaks or spills of coolant must be reported to the site superintendent immediately. Spills of less than 4L can be cleaned up by using absorbent clay. Larger spills must be surrounded with absorbent socks and cleaned up as per the directions listed on the Safety Data Sheet. Very large spills or spills which have leaked into a body of water must be reported to the Ministry of Environment and the Ministry of Labour.

COMPRESSED GAS CYLINDERS:

All compressed gas cylinders such as propane, oxygen, acetylene, and other welding gases must be stored outdoors in the upright position and secured in such a way that they cannot fall.

All compressed gas cylinders must:

- Be set on level ground
- Be maintained in good condition
- Chained or roped
- Be kept away from sources of ignition
- Be protected from vehicle traffic
- Handled and transported with care
- Be utilized and hooked up only by people who have had valid and current training

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EXCAVATING PREVIOUSLY CONTAMINATED SOIL:

If during excavation or bulldozing operations it is suspected that the soil is contaminated, all work in the area must be stopped immediately and reported to the site superintendent and safety officer. Work in the suspected area cannot continue until clearance has been given by the proper authorities.

The following parties must be notified immediately upon identification of suspected contaminated ground, soil, or water:

- Ministry of Environment
- Ministry of Labour
- Ministry of Natural Resources in some cases
- Site owner
- The city, township, or county
- If there is an immediate risk to the public, the police must also be notified.

WILDLIFE:

All work conducted by King Paving & Construction and our subcontractors will be conducted in such a manner as to minimize risk to wildlife. This may include tasks such as installing fences or creating berms. Trash will be kept in the proper containers and under no circumstances will litter such as food items or their packaging be left on the ground.

If you encounter wildlife such as racoons, foxes, coyotes, skunks, possums, deer, squirrels, or rodents, do not approach them. Keep your distance and notify the site superintendent immediately. These animals may have diseases such as rabies. It is also important to realize that these animals can become extremely aggressive, especially during mating season. Certain animals may also be on the endangered species list.


If you encounter a dead animal, keep your distance, and notify the site superintendent. Even dead animals carry diseases such as rabies and avian flu or may have fleas and ticks which may transmit harmful diseases. Once reported to the site superintendent, the Ministry of Natural Resources will be contacted to determine the correct course of action.

RODENT AND PEST CONTROL:

Our objective is to minimize the possibility of infestation from rats, mice, insects, bats, possums etc.

Management Strategy:

- Keep site clean and tidy with daily clean-ups
- Monitor area for infestation

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- Consult Pest Management Contractor if required
- Ensure all putrescible waste (waste that may become rotten or decay) is disposed of in an appropriately sealed receptacle
- Prior to the commencement of any demolition, individual blocks, properties, and the surrounding area should be inspected to identify the presence and extent of any infestations. Where infestations are identified, appropriate treatments must be implemented by licensed Pest Control Contractors to eliminate infestation before demolition
- Minimize ponding and exposed water sources to prevent mosquitoes and midges
- Ideally, licensed Pest Control Contractors should be consulted for management strategies after the substructure is completed. Frequently, a dark cold environment can be a pest habitat which presents an unacceptable working environment
- To prevent rat egress from live drains and sewers to new systems, the live systems should be temporarily sealed off with expanding drainage stoppers until connection to new drainage is completed.
- Where potential rodent infestation presents itself as a problem on site, consult a Pest Control company for advice. Do not attempt to address the problem internally.

SNAKES:

Snakes are a vital part of our environment, and therefore, encounters with any snake must be treated with care. Fortunately, the Massasauga Rattle Snake is the only poisonous snake in Ontario. This snake is very shy and prefers to hide or retreat from enemies rather than bite them. If threatened, it will shake its tail as a warning and strike only as a last resort to protect itself if it cannot escape. The Massasauga Rattle Snake is on the threatened species list.

There are species of 10 snakes in Ontario that are on the endangered species list, threatened species list, or are on the special concern list. More information on these snakes can be found at:


<http://www.ontario.ca/environment-and-energy/species-risk-type?name=Snakes+and+Lizards>

If a snake from the endangered, threatened or special concern list is encountered, move away, notify the site superintendent, and rope off the area. The Ministry of Natural Resources will be contacted, and further directions will be given.

NATIVE ARTIFACTS:

PENALTIES FOR DISTURBING OR REMOVING NATIVE ARTIFACTS WITHOUT A LICENSE:

The *Ontario Heritage Act* prohibits anyone from disturbing or altering an archaeological site — whether on land or under water — unless they hold a valid archaeological license issued by the ministry. You may be disturbing an archaeological site, if you pick up arrowheads in a farmer's field, grade an archaeological site with a bulldozer, or take objects from a shipwreck.

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Anyone who disturbs or alters an archaeological site or removes an artifact from a site without a license can be fined or imprisoned. A person or a director of a corporation found in violation of the act, or its regulations, can face a fine of up to \$1,000,000 or imprisonment for up to one year or both. A corporation found in violation of the act, or the regulations can face a fine of up to \$250,000.

What to do if you find human bones

The *Cemeteries Act* and the *Funeral, Burial and Cremation Services Act*, when proclaimed in force, require anyone who uncovers a burial site containing human remains to report the discovery to the appropriate authorities — the police or a coroner. Likewise, archaeologists who encounter human remains during archaeological fieldwork are required to comply with all relevant provisions of the *Cemeteries Act* and *Ontario Regulation 133/92 (Burial Sites)* as part of the terms and conditions of their archaeological license.

If human remains are discovered during land development activities, all construction and soil disturbance must stop immediately to allow the authorities to investigate. All archaeological fieldwork must stop until the coroner has had the opportunity to investigate, and the Registrar of Cemeteries has been consulted.

More information can be found at:

[Ontario Heritage Act](#)

http://www.mtc.gov.on.ca/en/heritage/heritage_act.shtml

[Ontario Heritage Toolkit](#)

<http://www.culture.gov.on.ca/english/heritage/Toolkit/toolkit.htm>

Guidelines for Archaeological Sites

http://www.mtc.gov.on.ca/en/archaeology/archaeology_assessments.shtml


[Parks Canada - Archaeology](#)

IMPORTANT CONTACT INFORMATION:

Ministry of Labour: 1-877-202-0008

Ministry of Environment: 1-800-565-4923

Ministry of Natural Resources: 1-800-667-1940

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COMMUNICATION

Communication of this program will be completed through any of the following forums:

- Scheduled safety meetings
- Safety communication board postings
- Employee orientation
- Subcontractor orientation
- Toolbox talks

This policy will be communicated to new employees during the orientation process. Records of communication will be maintained on SiteDocs.

TRAINING

All workers of King Paving & Construction Ltd. will be trained in the Environmental Policy & Procedures as well as any of the following:

- WHMIS 2015
- Asbestos Awareness or Abatement (where applicable)
- Worker Health & Safety Awareness in 4 Steps (or equivalent)
- Supervisor Health & Safety Awareness in 5 Steps (or equivalent)

Training records will be maintained by the Health & Safety Department in SiteDocs.

EVALUATION AND CONTINUOUS IMPROVEMENT

The Environmental Policy & Procedures will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislation updates will be reviewed to ensure the Policy & Procedures meet the provincial Occupational Health and Safety Act and other governing legislation. If there are legislative or updates in the company policies, the document will be revised and approved.

Evaluation of the Environmental Policy & Procedures will be conducted through any of the following:

- management safety meetings
- annually using surveys
- site audits
- safety observations.

Lead Policy	Issue Date: September 28, 2020	
	Revision Date: February 18, 2025	
Policy Number: HSMS 15-04	Revision Number: 006	
	 <i>Approved By: President</i>	

POLICY STATEMENT

The purpose of the Lead Policy is to establish guidelines for the safety of workers who are exposed to or required to work with lead.

SCOPE

This policy pertains to all workers, project managers, superintendents, foremen, and subcontractors who may be exposed to or work with lead.

DEFINITIONS

Lead – A chemical element. Lead is a heavy soft grey metal, used especially in the past in paints and for water pipes.

Lead Poisoning – A type of metal poisoning caused by lead in the body. The brain is the most sensitive. Symptoms may include abdominal pain, constipation, headaches, irritability, memory problems, inability to have children, and tingling in the hands and feet. It causes almost 10% of intellectual disability of otherwise unknown cause and can result in behavioral problems. Some of the effects are permanent. In severe cases anemia, seizures, coma, or death may occur.


RESOURCES REQUIRED

- Coveralls/Tyvek suit
- Gloves
- Mask
- Harness
- Water/hand washing station
- Knowledge of this procedure
- Confined space entry equipment
- Personnel who are trained in lead awareness and confined spaces.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Lead Policy.
- Allocate appropriate resources, training, and workers to implement and maintain the Lead Policy
- Review the Policy at least annually and approve all revisions. A signature is required on this Policy as proof of approval.
- Ensure that the policy elements have been communicated to all members of the Company.
- Ensure that a procedure is in place for sites where lead may be present.

Lead Policy	Issue Date: September 28, 2020	
	Revision Date: February 18, 2025	
Policy Number: HSMS 15-04	Revision Number: 006	
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Foremen/Supervisors/Managers/Superintendents will:

- Ensure that workers are following the procedures when the potential for exposure to lead exists.
- Inform workers of the hazard, as well as the personal hygiene and respirator requirements.
- Ensure that workers are wearing the correct PPE when the potential for exposure to lead exists.
- Restrict access of lead-contaminated environments to workers who are not adequately protected with proper P.P.E. and can prevent the entry of workers who are not directly involved in the operation.

Workers will:

- Wear all the appropriate PPE.
- Follow all safe procedures pertaining to lead.
- Have up to date WHMIS training

STANDARD/PROCEDURE

Federal Regulations define lead-based paint as paint containing more than 0.5% lead.

Lead poisoning is a health risk for workers during maintenance, renovation, construction, or demolition activities disturbing materials with lead-containing paints.


King Paving & Construction ensures that its workers will be educated about the health hazard of airborne lead and implementing control measures to prevent the risk of health hazards related to lead exposure.

Before commencing work, King Paving & Construction will obtain a designated substance report. The report will identify the areas and concentrations to which workers may be exposed to lead-containing paint. This policy acts in accordance with the MOL's *Guideline: Lead on Construction Projects*, and whenever possible, abrasive blasting, sanding, burning, cutting, or welding on steel structures coated with lead-containing paints will not be used to remove lead-containing materials, or lead paint. Instead, manual work with non-powered hand tools is recommended if possible.

King Paving & Construction's labourers typically perform manual demolition of lead-based painted plaster walls or building components by striking a wall with a sledgehammer or similar tool. This falls under "Type 2a Operations" according to MOL's *Guideline: Lead on Construction Projects*. This requires the workers to wear respirators. The recommended type for this operation would be a >95% efficiency, half-mask particulate respirator with an N, R or P-series filter with at least 95% efficiency. Workers with medical conditions complicated with the use of a respirator do not have to wear one, and alternate work is to be provided.

Personal protective clothing should be worn to prevent skin contamination. Coveralls or other full-body work clothing, gloves, hats, footwear and safety glasses, or face shields are examples of appropriate personal protective clothing. When indoors, dust and waste should be cleaned up and removed by vacuuming with a HEPA-filter vacuum to prevent lead contamination and exposure to lead.

For all work involving lead exposure, there is to be no smoking, eating, drinking, or chewing in contaminated areas. Food and beverages are to be stored in an uncontaminated area.

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The site Super may use signage, ropes, or barriers to warn that access is restricted to people wearing appropriate PPE.

COMMUNICATION

Communication of this program regarding the roles and responsibilities will be completed through any of the following forums:

- Annual Safety Day Training
- Safety communication board postings
- New hire worker orientation
- Toolbox talks
- JHSC meetings

Records of communication will be recorded and stored using SiteDocs or other means when required.

TRAINING


Management and workers of King Paving & Construction Ltd. will be trained in any or all the following:

- WHMIS 2015
- Basics of Safety for Workers in 4 Steps (or equivalent)
- Basics of Safety for Supervisors in 5 Steps (or equivalent)

EVALUATION

This policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy	Upgrade H&S Manual	Sep 28, 2020	New
Update Policy	Annual Review	Jan 25, 2021	001
Update Policy	Annual Review	Jan 18, 2022	002
Update Policy	Annual Review	Jan 18, 2023	003
Update Policy Added required resources section	Annual Review	Jan 23, 2024	004
Replaced eCompliance with SiteDocs	Change in safety platform	Nov 14, 2024	005
Annual review & corrected grammatical errors	Annual Review	Feb 18, 2025	006

Silica Policy	Issue Date: September 29, 2020	
	Revision Date: February 18, 2025	
Policy Number: HSMS 15-05	Revision Number: 006	
	 Approved By: President	

POLICY STATEMENT

The purpose of the Silica Policy is to educate King Paving & Construction Ltd. workers on the hazards of silica and to implement control measures for work that may produce silica dust.

SCOPE

This policy pertains to all workers, project managers, superintendents, foremen, and subcontractors who may be exposed to silica dust.

DEFINITIONS

Silica - the dioxide of silicon, occurring naturally as quartz, cristobalite, and tridymite. It is a refractory insoluble material used in the manufacture of glass, ceramics, and abrasives.


Silicosis - a condition caused by inhaling too much silica over a long period of time. Silica is a highly common, crystal-like mineral found in sand, rock, and quartz. Silica can have deadly consequences for people who work with stone, concrete, glass, or other forms of rock.

Symptoms of Silicosis - silicosis can appear from a few weeks to many years after exposure to silica dust. Symptoms typically worsen over time as scarring in the lungs occurs.

Cough is an early symptom and develops over time with exposure to silica that is inhaled. In acute silicosis, you may experience fever and sharp chest pain along with breathing difficulty. These symptoms can come on suddenly.

RESOURCES REQUIRED

- Coveralls/Tyvek suit
- Gloves
- Mask
- Harness
- Water/hand washing station
- Knowledge of this procedure
- Confined space entry equipment
- Personnel who are trained in silica awareness and confined spaces.

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ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Silica Policy.
- Allocate appropriate resources, training, and workers to implement and maintain the Silica Policy.
- Review the Policy at least annually and approve all revisions. A signature is required on this Policy as proof of approval.
- Ensure that the policy elements have been communicated to all members of the Company.
- Ensure that all site personnel are aware of the hazards of silica
- Ensure that a procedure is in place for sites where silica dust may be present.
- Provide the appropriate PPE required

Foremen/Supervisors/Managers/Superintendents will:

- Inform workers of the hazards of working when there is the potential for exposure to silica dust.
- Ensure that workers are following the procedures when the potential for exposure to silica dust exists.
- Ensure that workers wear the correct PPE when the potential for exposure to silica dust exists (i.e., cutting stone, chipping concrete etc.), and are following proper procedures.

Workers will:

- Wear all the appropriate PPE.
- Follow all safe procedures pertaining to silica.

Joint Health & Safety Committee Members will:

- Ensure that all precautions are taken at sites where silica is present.
- Ensure that all personnel are wearing the correct P.P.E. properly.
- Report unsafe acts or conditions to the foreman of the site and to the health and safety officer.


STANDARD/PROCEDURE

King Paving & Construction Ltd. ensures that its workers will be educated about the health hazards of silica and implementing control measures to prevent the risk of health hazards related to silica exposure.

Silica exists in many forms—one of these, "crystalline" silica (including quartz), is the most abundant and poses the greatest concern for human health.

Silica is a primary component of many common construction materials, and silica-containing dust can be generated during many construction activities, including but not limited to:

- Abrasive blasting (e.g., of concrete structures)
- Jackhammering, chipping, or drilling rock or concrete
- Cutting brick or tiles

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- Sawing or grinding concrete
- Road construction
- Loading, hauling, and dumping gravel
- Demolition of structures containing concrete
- Sweeping concrete dust

Since silica is a designated substance (O. Reg. 490/09), compliance with the OSHA and its regulations requires action to be taken where there is a silica hazard on a construction project.

Section 30 of the OSHA requires the owner of a project to determine if silica is present on a project and, if it is, to inform all potential contractors before work begins.


King Paving & Construction Ltd. recognizes the importance of planning the work to minimize the amount of silica dust generated.

- During the project planning phase, effort will be made to reduce the need for cutting, grinding, or drilling of concrete surfaces (e.g., formwork planning).
- Whenever possible, we will schedule work when concrete is still wet, because much less dust is released at that time.

When possible, workers are to apply water to the cutting or grinding surface to wet the surface and prevent the resulting dust from becoming airborne. Many construction tools/equipment types can be fitted with wet spray attachments. Water can also be manually applied to the concrete surface before and during work (grinding, drilling, cutting, etc.). If work surfaces are wetted manually with a water "mister" (e.g., during concrete chipping and jackhammering), a separate water supply system will be provided from a plumbed facility or a portable pressurized tank. Wet concrete slurry should be vacuumed up to prevent hardening and airborne exposure.

Barriers are used to isolate the work area from the rest of the project and to prevent entry by unauthorized workers. They do not prevent dust drift and are only used where natural ventilation is sufficient, and dust release is controlled. Barriers will be constructed to notify other workers that concrete grinding work is underway and access to the immediate work zone is restricted to authorized personnel.

Personal protective equipment should be worn to prevent respiratory distress. King Paving & Construction provides negative-pressure air-purifying half masks (when required) to its employees working in areas where hazard assessment reveals workers are at a risk of inhaling or non-fibrous silica dust from sandblasting, concrete cutting, or rock drilling. Please refer to King Paving & Construction's Respiratory Protection Program for more information on respirators.

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COMMUNICATION

Workers are to complete a daily JHA and discuss the hazards of silica dust. Toolbox talks will be conducted at sites where silica may be present.

Records of communication will be recorded and stored using SiteDocs or other means when required.

TRAINING

Management and workers of King Paving & Construction Ltd. will be trained in any or all the following:

- WHMIS 2015
- Basics of Safety for Workers in 4 Steps (or equivalent)
- Basics of Safety for Supervisors in 5 Steps (or equivalent)

EVALUATION

This policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy	Update H&S Manual	Sep 29, 2020	New
Update Policy	Annual Review	Jan 25, 2021	001
Update Policy	Annual Review	Jan 18, 2022	002
Update Policy Added JHSC Responsibilities section	Annual Review	Jan 18, 2023	003
Update Policy Added required resources section	Annual Review	Jan 24, 2024	004
Replaced eCompliance with SiteDocs	Change in safety platform	Nov 14, 2024	005
Annual Review	Annual Review	Feb 18, 2025	006

Asbestos Policy	Issue Date: September 23, 2020	
	Revision Date: February 18, 2025	
Policy Number: HSMS 15-06	Revision Number: 005	
	 Approved By: President	

POLICY STATEMENT

The purpose of the Asbestos Policy is to educate King Paving & Construction Ltd workers on the hazards of asbestos and to implement control measures for work that may have asbestos present.

SCOPE

This policy pertains to all workers, project managers, superintendents, foremen, and subcontractors who may be exposed to asbestos.

DEFINITIONS

Asbestos - any of several minerals (such as chrysotile) that readily separate into long flexible fibers, that cause asbestosis and have been implicated as causes of certain cancers, and that have been used especially formerly as fireproof insulating materials

ACM - Asbestos Containing Material such as certain floor tiles, ceiling tiles, pipe insulation, caulking and plaster


Asbestosis - a disease of the lungs due to asbestos particles that is marked by thickening and scarring of lung tissue

Mesothelioma - a usually malignant tumor derived from mesothelial tissue (such as that lining the lungs)

Friable - Easily crumbled or pulverized. Friable asbestos is very dangerous because when crumbled, it breaks apart into very small particles which become airborne and cannot be filtered with a normal filter mask.

RESOURCES REQUIRED

- Coveralls/Tyvek suit
- Gloves
- Mask
- Harness
- Water/hand washing station
- Knowledge of this procedure
- Confined space entry equipment
- Personnel who are trained in lead awareness and confined spaces.

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	<hr/> <i>Approved By: President</i>	

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Asbestos Policy.
- Allocate appropriate resources, training, and workers to implement and maintain the Asbestos Policy.
- Review the policy at least annually and approve all revisions. A signature is required on this policy as proof of approval.
- Ensure that the policy elements have been communicated to all members of the Company.
- Ensure that all site workers are aware of the hazards of asbestos.
- Ensure that a procedure is in place for sites where asbestos may be present.
- Provide the appropriate required PPE

Foremen/Supervisors/Managers/Superintendents will:

- Inform workers of the hazards of working when asbestos is present.
- Ensure that workers are following the procedures when asbestos is present.
- Ensure that workers are wearing the correct PPE when asbestos is present.

Workers will:

- Wear all the appropriate PPE and devices.
- Follow all safe procedures pertaining to asbestos.
- Report areas where the worker may suspect asbestos is present

STANDARD/PROCEDURE


Asbestos is common in many older buildings. Disturbing this material during construction, renovation, maintenance, or restoration can cause friable material (hazardous dusts) to become airborne.

When asbestos is inhaled, it can be hazardous and lead to the following diseases:

- Asbestosis
- Lung cancer
- Mesothelioma (cancer of the lining of the chest and/or abdomen).

Some examples of asbestos containing materials (ACMs) are, but are not limited to:

- Sprayed-On Fireproofing
- Pipe and Boiler Insulation
- Loose Fill Insulation
- Asbestos Cement Products
- Acoustic Plaster
- Acoustic Tiles

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- Vinyl Asbestos
- Gaskets
- Roofing Felts
- Asphalt/Asbestos Limpet Spray
- Drywall Joint-Filling Compound
- Coatings and Mastics

It is King Paving & Construction's policy that only specialist contractors who have the proper credentials and training may carry out work on ACMs (Asbestos Containing Material) on site. To remove asbestos, a worker requires knowledge of the type of asbestos, knowledge of the proper choice and use of PPE and respirators, understanding of containment procedures and knowledge of proper handling, storage, and waste removal procedures. For type 3 removals, training is a legal requirement.

Prior to Commencing Work


Supervisors:

1. Prior to commencing work in any area, request a copy of the owner's Asbestos Report.
2. If there is asbestos in the work area and it needs to be removed to perform the work, request that the owner remove it.
3. Do not commence work until you have received a notice from the owner in writing that the asbestos has been removed, and it is safe to commence or return to work.
4. If there is asbestos in the work area and its presence does not impact on the work, advise workers of location. Only workers with appropriate Asbestos Awareness Training are permitted to work in the environment. Such training should be carried out by a competent training provider and proof of this should be provided to King Paving & Construction upon request.

During Work

Workers:

1. When any material found on a job site appears to be or resembles asbestos, workers shall immediately stop work and notify their supervisor to facilitate testing to determine the nature of the material.
2. Once the material has been tested and identified, the supervisor will make the decision on how to proceed using site-specific safe work procedures designed specifically for the work and based on the findings of the tests conducted.
3. If working in an area known to contain asbestos, workers must understand the conditions they will be working in, the appropriate measures and procedures for their work, the required PPE to be

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worn, how to clean the PPE after each use and the limitations of the PPE.

- If there is any doubt about pipe or duct insulation, textured ceilings, vinyl asbestos floor tile, flooring sheet goods, wall cladding or underground piping, especially in older facilities, do not commence work and notify supervisor.

COMMUNICATION

Communication is to take place between the client, project manager and site superintendent. The Ministry of Labour must be contacted in areas where asbestos is discovered and for removal operations.

TRAINING

Applicable Management and workers of King Paving & Construction Ltd. will be trained in any or all the following:

- Asbestos Awareness Training (for non-removal situations)
- Asbestos Abatement Training (for workers performing removal)

EVALUATION

This policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

ASSOCIATED DOCUMENTS/FORMS

- Ontario Regulation 278/05 Designated Substance – Asbestos on Construction Projects and in Buildings and Repair Operations

Description of Change(s)	Reason for Change (s)	Date	Revision No.
Create new policy	New	Sep 23, 2020	New
Update Policy	Annual Review	Jan 25, 2021	001
Update Policy	Annual Review	Jan 26, 2022	002
Update Policy	Annual Review	Jan 19, 2023	003
Update Policy Added resources required section	Annual Review	Jan 24, 2024	004
Annual Review	Annual Review	Feb 18, 2025	005

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POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, subcontractors, and visitors. The purpose of this policy is to provide written guidelines for identifying and controlling health hazards in the workplace and essential to maintaining the health and safety of our employees.

King Paving & Construction Ltd. recognizes the benefits of a healthy workforce and encourages and supports workers in achieving ownership for their physical, mental, and emotional well-being, resulting in improving overall health and wellness.

SCOPE AND REGULATION

This policy pertains to any workers, visitors, subcontractors, and service providers that work for King Paving & Construction Ltd. that may be exposed to occupational health exposures.

The policy will outline the several types of health hazards that workers may be exposed to during regular work activities. Each specific type of occupational hazard listed will also provide identification of the hazard and control measures to prevent or treat the hazard if accidental exposure occurs. The Company will complete a risk assessment for occupational health hazards and provide controls to reduce the level of risk exposure to workers.

- Occupational Health and Safety Act
- Ministry of Labour
- Reg. 1101
- WSIB Form 82
- WHMIS/SDS

DEFINITIONS


For this policy, the following definitions will be used.

Company – Means the Company to whom the subcontractor is providing services for (e.g., King Paving & Construction Ltd.).

Occupational Health – Means all aspects of health and safety in the workplace and has a strong focus on primary prevention of hazards. The health of the workers has several determinants, including risk factors at the workplace leading to cancers, accidents, musculoskeletal diseases, respiratory diseases, hearing loss, circulatory diseases, stress-related disorders and communicable diseases and others.

Occupational Health Surveillance – Provides information on where, how, and why workers get sick or hurt on the job. This information is used to improve workers' health and safety through appropriate prevention activities. Workplace injuries and illnesses can be prevented by control or elimination of hazards.

Occupational Disease – An occupational disease is any chronic ailment that occurs because of work or occupational activity.

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Medical Surveillance – Is the systematic assessment of employees exposed or potentially exposed to occupational hazards. This assessment monitors individuals for adverse health effects and determines the effectiveness of exposure prevention strategies.

Competent Person – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance,
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge of any potential or actual danger to health or safety in the workplace.

Supervisor – Means a person who has charge of a workplace or authority over a worker.

Qualified Person – Is deemed to be qualified due to training and experience with the inspection and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

Worker – A person who performs work or supplies services for monetary compensation. Other people who work or provide services to an employer for no money, who may be prescribed by regulation include an unpaid intern, co-op students, and certain other learners.

REQUIRED RESOURCES:


- Safe Work Procedure for Cold Stress.
- Ability to dress in layers.
- P.P.E. as required for the site.
- Vehicle to act as a warming area.
- First Aid Kit and trained first aid personnel.
- Warm up schedule

COLD STRESS

Cold stress or hypothermia can affect construction workers who are not protected against cold. The cold may result naturally from weather conditions or be created artificially, as in refrigerated environments.

Cold is a physical hazard in many construction workplaces. When the body is unable to warm itself, serious cold related illnesses and injuries may occur, leading to permanent tissue damage and even death.

The body tries to maintain an internal (core) temperature of approximately 37C (98.6 degrees F). This is done by reducing heat loss and increasing heat production. Under cold conditions, blood vessels in skin, arms and legs constrict decreasing blood flow to extremities. This minimizes cooling of the blood and keeps critical internal organs warm. At very low temperatures, however, reducing blood flow to the extremities can result in lower skin temperature and higher risk of frostbite.

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Standard

All workers working in hot or cold environments must take all reasonable precautions to ensure that they are not being overexposed to cold and/or heat. Wearing personal protective clothing, equipment and drinking water and other fluids will prevent such exposures.

Mild Hypothermia

Early signs of hypothermia include:

- Shivering
- Blue lips and fingers
- Poor coordination

Moderate Hypothermia

This stage includes:

- Mental impairment
- Confusion
- Poor decision making
- Disorientation
- Inability to take precautions from the cold
- Heart slows down
- Slow breathing


Severe Hypothermia

In severe cases, hypothermia resembles death. Patients must be treated as though they are alive. Signs include:

- Unconsciousness
- Heart slows down to the point where pulse is irregular and/or difficult to find
- No shivering
- No detectable breathing

First Aid

- Stop further cooling of the body and provide heat to begin rewarming.
- Carefully move the worker to shelter. Sudden movement or rough handling can upset heart rhythm.
- Keep the worker awake.
- Remove wet clothing and wrap the worker in warm covers.
- Rewarm neck, chest, abdomen, and groin – but not extremities.
- Apply direct body heat or use safe heating devices.
- If the worker is conscious, give a warm sweet drink.

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- Monitor breathing. Administer artificial respiration if necessary.
- Call for medical help or transport the worker carefully to the nearest medical facility.

Frostbite

Signs and Symptoms

Frostbite is a common injury caused by exposure to severe cold or by contact with extremely cold objects. Frostbite occurs more readily from touching cold metal objects than from exposure to cold air. This is due to heat being rapidly transferred from skin to metal. The body parts that are most affected are the face, ears, fingers, and toes. When tissue freezes, blood vessels are damaged. This reduces blood flow and may cause gangrene.

Frostbite symptoms vary, are not always painful, but often include a sharp, prickling sensation. The first indication of frostbite is that the skin looks waxy and feels numb. Once the tissue becomes hard, the case is a severe medical emergency. Severe frostbite can result in blistering that usually takes about ten days to subside. Once damaged, tissue will always be more susceptible to frostbite in the future.

First Aid

- Warm frostbitten area gradually with body heat; DO NOT RUB.
- Do not thaw hands or feet unless medical aid is distant and there is no chance of refreezing. Body parts are better thawed at the hospital.
- Apply sterile dressing to blisters to prevent breaking; get medical attention.

PERSONAL PROTECTIVE CLOTHING (PPE)

Clothing

Clothing should be selected to suit the temperature, weather conditions (e.g., wind speed, rain), the level and duration of activity and job design. These factors are important to consider so that you can regulate the amount of heat and perspiration you generate while working.


If the work pace is too fast or if the type and amount of clothing are not properly selected, excessive sweating may occur.

The clothing next to your body will become wet and the insulation value of the clothing will decrease dramatically.

Clothing should be worn in multiple layers, which provides better protection than a single thick garment.

Having several layers also gives you the option to open or remove a layer before you get too warm and start sweating or to add a layer when you take a break.

Successive outer layers should be larger in size than the inner layer otherwise; the outermost layer will compress the inner layers and decrease the insulation properties of the clothing.

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The inner layer should provide insulation and be able to 'wick' moisture away from the skin to help keep it dry. Thermal underwear made from polyesters or polypropylene is suitable for this purpose.

The additional layers of clothing should provide adequate insulation for the weather conditions under which the work is being done.

For work in wet conditions, the outer layer of clothing should be waterproof. Where the work cannot be shielded from the wind an easily removable windbreak garment should be used.

Clothing should be kept clean as dirt fills air cells in fibers of clothing and destroys its insulating abilities.

Clothing must be kept dry; remove snow from clothing prior to entering heated shelters.

If the area is warm enough, perspiration should be allowed to escape by opening the neck, waist, sleeves, and ankle fasteners or by removing the outer layer.

Footwear

All footwear must conform to regulatory requirements.

Felt lined, rubber bottomed, leather topped boots with removable felt insoles are best suited for heavy work in the cold season.

Leather boots can be waterproofed with some products that do not block the pores in the leather.

You may prefer to wear one pair of thick bulky socks or two pairs – one inner sock of silk, nylon or thin wool and a slightly larger, thick outer sock.

Liner socks made from polypropylene will help keep feet dry and warmer by wicking sweat away from the skin.

If work conditions permit, have extra socks available so you can dry your feet and change your socks during the day.

Always wear the right thickness of socks for your boots. If they are too thick, the boots will be tight, and the socks will lose much of their insulating properties when they are compressed inside the boot.


WIND CHILL

At any temperature, you feel colder as the wind speed increases. The combined effect of cold air and wind speed is expressed as 'equivalent chill temperature' or simply 'wind chill' temperature in degrees Celsius or Fahrenheit.

It is essentially the air temperature that would feel the same on exposed human flesh as the given combination of air temperature and wind speed.


Wind Chill Calculation Chart

T air = Air Temperature in degree C

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V = Observed wind speed at 10m elevation, in km/hr.

T _{air}	5	0	-5	-10	-15	-20	-25	-30	-35	-40	-45	-50
5	4	-2	-7	-13	-19	-24	-30	-36	-41	-47	-53	-58
10	3	-3	-9	-15	-21	-27	-33	-39	-45	-51	-57	-63
15	2	-4	-11	-17	-23	-29	-35	-41	-48	-54	-60	-66
20	1	-5	-12	-18	-24	-31	-37	-43	-49	-56	-62	-68
25	1	-6	-12	-19	-25	-32	-38	-45	-51	-57	-64	-70
30	0	-7	-13	-20	-26	-33	-39	-46	-52	-59	-65	-72
35	0	-7	-14	-20	-27	-33	-40	-47	-53	-60	-66	-73
40	-1	-7	-14	-21	-27	-34	-41	-48	-54	-61	-68	-74
45	-1	-8	-15	-21	-28	-35	-42	-48	-56	-62	-69	-75
50	-1	-8	-15	-22	-29	-35	-42	-49	-56	-63	-70	-76
55	-2	-9	-15	-22	-29	-36	-43	-50	-57	-63	-70	-77
60	-2	-9	-16	-23	-30	-37	-43	-50	-57	-64	-71	-78
65	-2	-9	-16	-23	-30	-37	-44	-51	-58	-65	-72	-79
70	-2	-9	-16	-23	-30	-37	-44	-51	-59	-66	-73	-80
75	-3	-10	-17	-24	-31	-38	-45	-52	-59	-66	-73	-80
80	-3	-10	-17	-24	-31	-38	-45	-52	-60	-67	-74	-81
Risk of frostbite within 30minutes												
Frost bite possible in 5 - 10minutes												
Frostbite possible in 2-5minutes												
Foot bite possible in less than 2minutes												

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Work/Warm-up Schedule Guideline

Note: This schedule is a guideline only. Site specific conditions, work demands, and PPE should be considered while determining exposure and break schedules.


Air Temp.	No noticeable wind		8 km/h Wind		16 km/h wind		24 km/h Wind		32 km/h Wind		
	Max. Work Period	No. of Breaks	Max. Work Period	No. of Breaks	Max. Work Period	No. of Breaks	Max. Work Period	No. of Breaks	Max. Work Period	No. of Breaks	
-26 to -28	Normal	1	Normal	1	75 min.	2	55 min.	3	40 min.	4	
-29 to -31	Normal	1	75 min.	2	55 min.	3	40 min.	4	30 min.	5	
-32 to -34	75 min.	2	55 min.	3	40 min.	4	30 min.	5	Non - Emergency work should cease		
-35 to -37	55 min.	3	40 min.	4	30 min.	5	Non - Emergency work should cease				
-38 to -39	40 min.	4	30 min.	5	Non - Emergency work should cease						
-40 to -42	30 min.	5	Non - Emergency work should cease								
-43 & below	Non - Emergency work should cease										

Work/Warm-up Schedule for Outdoor Activities

This information applies to moderate – heavy physical work activity in any four-hour period. At the end of the four-hour period an extended break in a warm location is suggested.

Warm-up breaks are assumed to provide 10 minutes in a warm environment. These guidelines apply to workers wearing dry clothing.

Note: All temperatures are approximate. The number of breaks includes normal breaks after two hours and the number of additional warm-up breaks needed.

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Apply the schedule one step lower (towards colder temperatures) for work with limited to no physical activity. For example, at -35C with no noticeable wind the typical schedule would be three breaks minimum with a maximum work period of 55 minutes. If the work is limited to no physical activity apply the guidelines one level below at -38C for four breaks and maximum work period of 40 mins.

If reliable weather reports are not available, use the following as a guide to estimate wind velocity:

Wind Speed	Guideline/Wind Characteristic
8 km/h (5mph)	Will move a light flag
16 km/h (10mph)	Will fully extend a light flag
24 km/h (15mph)	Will raise a newspaper sheet
32 km/h (20mph)	Will produce blowing/drifted snow

Environment Canada may report a wind chill index. If wind speeds are higher than those identified in the chart, a wind chill of -51C should be used to determine the point at which all non-emergency work should stop.


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Cold Stress Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Cold Stress Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Complete the pre-job hazard analysis prior to commencing work.
- Check the weather network to determine the temperature, wind chill and other pertinent conditions such as snow or freezing rain.
- Ensure that workers use the methods, procedures and equipment required by OHS and all regulations.
- Ensure that workers use or wear equipment, protective devices, or clothing that is required by the employer. This includes ensuring that workers are dressing appropriately for the weather conditions of the day.
- Advise workers about actual or potential health and safety concerns.
- Give workers written instructions on the measures and procedures to protect themselves
- Take every precaution reasonable to protect the workers.
- Supervise workers personally or have an assistant, who is a competent person do so.

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- Inspect the workplace, equipment, and tools weekly.
- Ensure all required posting are available in the construction trailers or Health & Safety binders.
- Maintain a Company provided logbook with daily entries as to work activities, performance management or health and safety concerns.
- Complete weekly toolbox talks, and other training material as directed or required for site specific.
- Prepare a site emergency plan. This plan must be communicated to all workers and discussed at the JHA.
- Take progressive disciplinary measures for workers and subcontractors who do not meet the legislative standards.
- Complete assigned training to assist in the identification, developing controls and monitoring of occupational health concerns on the jobsites.
- Monitor workers for signs of cold stress and hypothermia.

Workers will:


- Comply with the health and safety legislation.
- Dress appropriately for the weather conditions of the day.
- Be aware of the policies and procedures to follow regarding cold stress.
- Self-monitor for signs of cold stress and hypothermia.
- Never use or operate equipment in a way that could put yourself or other workers in danger.
- Never remove or make ineffective any protective devices.
- Select worker representatives for the JHSC.
- Report any violations of the OHSA, any defective equipment, or any workplace hazard to the employer or supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Never engage in horseplay on site. Includes, but not limited to the following: pranks, competitions, showing off your strength, roughhousing or unnecessary running.
- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures. Refer to the SDS binder whenever handling chemicals.
- Participate in any training for occupational health concerns provided by the Company.

Health & Safety Representatives will:

- Be familiar with the green book, emergency procedures and work refusal procedures.
- Be familiar with the Cold Stress policies and procedures.
- Inspect the project at least once a month.
- Make recommendations or report findings about hazards to the employer.

Subcontractors will:

- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health & Safety Agreement.

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Joint Health & Safety Committee members will:

- Be familiar with the Cold Stress policies and procedures.
- Ensure that workers are dressed properly for the weather.
- Ensure all personnel on site are following the proper procedures regarding cold stress and cold weather precautions.
- Report any occupational health concerns to their immediate supervisor immediately.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Ensure all personnel are made aware of the cold stress policies and procedures.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through, but not limited to, Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Attend training courses to keep abreast of new requirements for the management of the occupational health program.
- Keep abreast of the updated legislation regarding OSHA standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Prepare field safety material as required.


TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

Training records shall be maintained for employees involved in all aspects of legislative compliance.

The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

Safe work practices and procedures will be provided to all workers through toolbox talks and onsite training sessions.

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COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

IHSA Construction Manual

Occupational Health and Safety Act Construction and Industrial Regulations

Safe Work Procedures

Safe Work Practices

General Safety Rules and Regulations

Emergency Response Checklist

Posted Material Checklist

Progressive Discipline Form

CONTINUOUS IMPROVEMENT

This policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the Cold Stress Policy meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Heat Stress Policy	Issue Date: February 1, 2021	
	Revision Date: February 18, 2025	
Policy Number: HSMS 15-08	Revision Number: 005	
	 Approved By: President	

POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, subcontractors, and visitors. The purpose of this policy is to provide written guidelines for identifying and controlling health hazards in the workplace and essential to maintaining the health and safety of our employees.

King Paving & Construction Ltd. recognizes the benefits of a healthy workforce and encourages and supports workers in achieving ownership for their physical, mental, and emotional well-being, resulting in improving overall health and wellness.

SCOPE AND REGULATION

This policy pertains to any workers, visitors, subcontractors, and service providers that work for King Paving & Construction Ltd. that may be exposed to heat stress hazards.

The policy will outline the several types of health hazards that workers may be exposed to during regular work activities. Each specific type of occupational hazard listed will also provide identification of the hazard and control measures to prevent or treat the hazard if accidental exposure occurs. The Company will complete a risk assessment for occupational health hazards and provide controls to reduce the level of risk exposure to workers.

- Occupational Health and Safety Act
- Ministry of Labour
- Reg. 1101
- WSIB Form 82
- WHMIS/SDS
- Ministry of the Environment


DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the Company to whom the Subcontractor is providing services for (e.g., King Paving & Construction Ltd.).

Occupational Health – Means all aspects of health and safety in the workplace and has a strong focus on primary prevention of hazards. The health of the workers has several determinants, including risk factors at the workplace leading to cancers, accidents, musculoskeletal diseases, respiratory diseases, hearing loss, circulatory diseases, stress-related disorders and communicable diseases and others.

Occupational Health Surveillance – Provides information on where, how, and why workers get sick or hurt on the job. This information is used to improve worker health and safety through appropriate prevention activities. Workplace injuries and illnesses can be prevented by control or elimination of hazards.

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Occupational Disease – An occupational disease is any chronic ailment that occurs because of work or occupational activity.

Medical Surveillance – Is the systematic assessment of employees exposed or potentially exposed to occupational hazards. This assessment monitors individuals for adverse health effects and determines the effectiveness of exposure prevention strategies.

Competent Person – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance,
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge of any potential or actual danger to health or safety in the workplace.

Supervisor – Means a person who has charge of a workplace or authority over a worker.

Qualified Person – Is deemed to be qualified due to training and experience with the inspection and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

Worker – A person who performs work or supplies services for monetary compensation. Other persons who work or provide services to an employer for no money, who may be prescribed by regulation includes an unpaid intern, co-op students, and certain other learners.

REQUIRED RESOURCES:


- Plenty of potable drinking water.
- Sunscreen.
- Lightweight skin coverings.
- Tinted sunglasses.
- Vehicle with an operational air conditioner.
- First Aid kit and trained First Aid personnel.
- Cell phone in case of emergency.
- SafeWork Procedure for Heat Stress.

HEAT STRESS PLAN

Standard/Procedure

This procedure has been developed in recognition of potential problems caused by high temperatures in the work environment.

The policy is intended to protect workers from potential adverse effects of overexposure to heat.

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Factors Influencing Heat Stress

The heating balance of the body depends on several factors:

- Air temperature
- Humidity (moisture in the air)
- Radiant heat load (sun, furnaces, molten material, steam, etc.)
- Physical Activity (how hard the person is working)
- Cooling (by sweat evaporation)
- Body Adjustments (acclimatization and general health)

Implementation Criteria

- The humidex reaches or exceeds 35C.
- Environment Canada issues a humidex advisory (air temperature exceeding 30C and humidex exceeding 40)
- Heat waves (three or more days of temperatures of 32C or more)


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Heat Stress Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Heat Stress Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Exercise due diligence for personal safety when assigning work in extreme heat.
- Communicate and implement the Heat Stress Plan for all workers when criteria warrants and in conjunction with the Health & Safety Department.
- Assess job demands and have monitoring and control strategies in place for hot days and hot workplaces.
- Ensure workers are aware of:
 - Factors which can predispose them to heat stress.
 - The warning signs and symptoms of heat stress.
 - The measures to be taken to protect against this hazard.

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Health & Safety Department will:

- Provide worker information on heat stress hazards, including periodic safety talks on heat stress during hot weather or during work in hot environments.
- Monitor the workplace to determine when hot conditions arise.
- Act as a resource for supervisors and workers regarding working in hot environments.
- Assist supervisors in assessing the workplace for potential heat stress hazards and provide advice on control strategies.
- Provide assistance and advice on implementing the Heat Stress Policy.
- Investigate and report all heat stress related incidents as per the Health & Safety Manual.

Workers will:

- Be familiar with heat stress hazards, predisposing factors, and preventative measures.
- Be alert to symptoms in themselves and others.
- Seek advice from their medical practitioner if they have a chronic health condition or are taking medications which may increase the risk of heat stress.
- Drink adequate amounts of water regularly to maintain fluid levels and avoid dehydration.
- Avoid caffeinated beverages and alcohol when working in hot environments.
- Report all occurrences of heat stress related illness to their supervisor immediately.


Education and Information

Workers should be instructed regarding working in hot environments. Instruction should include:

- Knowledge of heat stress hazards.
- Recognition of risk factors, symptoms, and health effects.
- Actions to be taken for controlling heat stress.
- First aid responses.
- Reporting procedures.

First Aid and Emergency Response for Heat Illness

HEALTH EFFECT	CAUSES	SYMPTOMS	TREATMENT
Heat Rash	Hot humid environment; plugged sweat glands.	Red bumpy rash with itching.	Change into dry clothes often and avoid hot environments. Rinse skin with cool water. Keep skin cool and dry.
Sunburn	Over-exposure to the sun.	Red, painful, or blistering and peeling skin.	If the skin blisters, seek medical aid. Use skin lotions and work in the shade.
Heat Cramps	Heavy sweating drains the body of salt.	Painful cramps in arms, legs, or stomach that occur suddenly at work or later at home. Heat cramps are a warning of other	Move to a cool area; loosen clothing and drink an electrolyte-replacement beverage. If cramps are severe or do not go away, seek medical aid.

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		more serious heat-induced illnesses.	
Fainting	Fluid loss and inadequate water intake.	Sudden fainting after at least two hours of work; cool moist skin; weak pulse.	GET MEDICAL ATTENTION Assess need for CPR. Move to a cool area; loosen clothing; make a person lie down; and if the person is conscious, offer sips of cool water. Fainting may also be due to other illnesses.
Heat Exhaustion	Fluid loss and inadequate salt and water intake causes the body's cooling system to break down.	Heavy sweating; cool, moist skin, body temperature above 38C, weak pulse, normal or low blood pressure, tired and weak, nausea and vomiting, very thirsty, panting or breathing rapidly, blurred vision.	GET MEDICAL ATTENTION This condition can lead to heat stroke, which can kill; move the person to a cool shaded area; loosen or remove excess clothing; provide cool water to drink; fan and spray with cool water.
Heat Stroke	When the body has used up its water and salt reserves, sweat stops and temperature rises. Heat stroke may occur suddenly or follow heat exhaustion.	High body temperature (above 40C) and any of the following: the person is weak, confused, upset or acting strangely; has hot, dry, red skin; a fast pulse; headache or dizziness; in later stages, a person may pass out and have convulsions.	CALL EMERGENCY SERVICES. THIS IS AN IMMEDIATE MEDICAL EMERGENCY. PROMPT ACTION MAY SAVE THE PERSON'S LIFE. This condition can kill a person quickly; remove excess clothing; fan and spray the person with cool water; offer sips of water if the person is conscious.

Where there is potential for heat stress, control measures must be taken to prevent heat exposure in the workplace.


Appropriate workplace controls will vary depending on the type of workplace and other factors.

Administrative Controls

- Assess the demands of all jobs and have monitoring and control strategies in place for hot days and hot workplaces.
- Provide annual heat stress training and review during hot weather.
- Provide cool drinking water near workers and remind them to drink a cup about every 20 minutes or more to stay hydrated.
- Measure humidex and increase the frequency and length of rest breaks as needed.
- Assign additional workers or slow down the pace of work.
- Encourage workers to start a 'buddy system' as people are not likely to notice their own symptoms.
- Adjust expectations for workers coming back to work after an absence.
- Investigate any heat-related incidents.

Engineering Controls

- Reduce physical demands of work tasks by utilizing mechanical assistance whenever possible (dollies, carts, lifting devices).

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- Organize the work to reduce the pace of activity.
- If possible, postpone strenuous work until a cooler time of the day.
- Provide a shaded area if possible.
- Provide barriers to shield workers from radiant heat exposure.
- For indoor work, provide cooling fans or air conditioning where possible.
- Rotate workers in and out of hot work areas whenever possible.
- Consider cooling vests or other personal cooling equipment.

Protective Clothing

- Light summer weight clothing should be worn to allow free air movement and sweat evaporation.
- Outdoors, long sleeved shirts and pants are advised.
- Air, water, or ice cooled clothing should be considered if feasible.


Measuring Heat and Humidity Levels

A thermal hygrometer is a simple way to measure the temperature and relative humidity in your workplace.

- Select a representative location within the zone where measurements can be taken (if you want to base your actions on a single reading, select the highest heat stress zone).
- Record measurements at intervals if the humidex value is above 30C or if the temperature is above 26C.
- Read the temperature and humidity from each thermal hygrometer.
- Use the Humidex Value Chart to determine the humidex value and the appropriate workplace response.

Humidex Heat Stress Response Plan

Temp (in °C)	Relative Humidity (in %)																			
	100%	95%	90%	85%	80%	75%	70%	65%	60%	55%	50%	45%	40%	35%	30%	25%	20%	15%	10%	
49																				50
48	NEVER TOLERATE ANYONE'S SYMPTOMS OR RESPOND TO THEM AS IF THEY ARE NORMAL																			
47	Moderate Unacclimatized & Heavy Acclimatized																			
46	Moderate Acclimatized & Light Unacclimatized																			
45	Action																			
44	work with 45 min/hr rest																			
43	work with 30 min/hr rest																			
42	work with 15 min/hr rest																			
41	wear for symptoms & extra water alert for symptoms & extra water																			
40	water as needed																			
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Heat Stress Acclimatization

Acclimatization – Is a gradual process in which the body becomes accustomed to temperature extremes.

Canadian summers are not usually hot enough for workers doing light work to be considered acclimatized. Workers performing moderate work cannot be assumed to be acclimatized unless they are regularly exposed to significant radiant heat.

Category	Examples
Rest	Sitting
Light	Sitting with moderate arm and leg movements. Standing with light work at machine or bench while using mostly arms. Standing with light to moderate work at a machine or bench including some walking. Flagging, driving, or operating heavy equipment.
Moderate	Walking about with moderate lifting and pushing. Walking on level at 4 mph (6 km/hr) while carrying 5lbs. (3kg) weight load
Heavy	Intense arm and trunk work, carrying, shoveling, manual sawing, pushing, and pulling heavy loads, walking at a fast pace.
Very Heavy	Very intense activity at fast to maximum pace. Shoveling wet sand.

Action Levels and Response


The Humidex plan is a simplified way of protecting workers from heat stress which is based on the 2007 ACGIH Heat Stress TLV® (Threshold Limit Value®) which uses wet bulb globe temperatures (WBGT) to estimate heat strain. These WBGT's were translated into Humidex.

The ACGIH specifies an action limit and a TLV® to prevent workers' body temperature from exceeding 38C (38.5C for acclimatized workers). Below the action levels, most workers will not experience heat stress.

Humidex Plan and Action Levels

Applies to un-acclimatized workers doing moderate work. Never ignore symptoms. Consider extra clothing or radiant heat conditions when using this guideline.

Humidex		Action Recommended
Low	30-37	Post heat stress alerts. Watch for symptoms. Drink water.
Medium	38-39	Reduce physical activity (e.g. slower pace, more breaks). Recommend work with 15 minutes per hour relief. Drink a cup of water every 20-30 minutes.
Moderate	40-41	Further reduce physical activity. Recommend working with 30 minutes per hour relief. Drink a cup of water every 15-20 minutes.

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High	42-44	Severely curtail physical activity. Recommend work with 45 minutes per hour relief. Ensure sufficient rest and recovery time. Drink a cup of water every 10-15 minutes.
Extreme	45+	Hazardous to continue physical activity.

Standard

All workers exposed to the sun's rays must be made aware of the harmful effects it could cause without proper protection.

Procedure

Tanning and burning are caused by ultraviolet rays from the sun. These rays cannot be seen or felt but penetrate the skin and stimulate cells containing a brownish pigment called melanin. Melanin tries to protect the skin by absorbing and scattering ultraviolet rays.


To prevent skin damage caused by the sun review the following:

- Avoid overexposure to ultraviolet light.
- Sunscreens contain one or more protective chemicals that absorb and scatter ultraviolet rays. These have a numerical rating system to indicate the specific amount of protection. The numbers, known as Sun Protection Factors (SPF), are listed on the product label. The higher the SPF number, the greater the protection. Although no sunscreen blocks UV radiation 100 percent.
- Sunscreens are available in many forms including lotions, creams, gels, sprays, ointments, and wax sticks. Besides sunscreens, use a lip balm with SPF of 15 or higher to protect your lips from sunburn.
- Sunscreens should be applied 20 to 30 minutes before going out into the sun to allow time for the sunscreen to start working. Apply liberally and reapply every two hours to provide maximum effectiveness. Do not use sunscreens to increase the time spent in intense sunlight or in place of protective clothing.
- Clothing provides protection from the sun and does not allow the UV rays to penetrate as easily.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Heat Stress Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Heat Stress Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.


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Foremen/Supervisors/Managers/Superintendents will:

- Complete the pre-job hazard analysis prior to commencing work.
- Check the weather report each day to determine the potential for heat stress hazards.
- Ensure that workers use the methods, procedures and equipment required by OSHA and all regulations.
- Ensure that workers use or wear equipment, protective devices, or clothing that is required by the employer.
- Advise workers about actual or potential health and safety concerns.
- Give workers written instructions on the measures and procedures to protect themselves.
- Take every precaution reasonable to protect the workers.
- Supervise workers personally or have an assistant, who is a competent person do so.
- Inspect the workplace, equipment, and tools weekly.
- Ensure all required postings are available in the construction trailers or Health and Safety binders.
- Maintain a Company provided logbook with daily entries as to work activities, performance management or health and safety concerns.
- Complete weekly toolbox talks, and other training material as directed or required for site specific.
- Prepare a site emergency plan. This plan must be communicated to all workers and discussed at the JHA.
- Take progressive disciplinary measures for workers and subcontractors who do not meet the legislative standards.
- Complete assigned training to assist in the identification, developing controls and monitoring of occupational health concerns on the jobsites.
- Monitor workers for signs of heat stress.

Workers will:

- Comply with the health and safety legislation.
- Dress properly for the weather conditions of the day.
- Be aware of the policies and procedures regarding heat stress.
- Never use or operate equipment in a way that could put yourself or other workers in danger.
- Never remove or make ineffective any protective devices.
- Select worker representatives for the JHSC.
- Report any violations of the OSHA, any defective equipment, or any workplace hazard to the employer or supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Never engage in horseplay on site. Includes, but not limited to the following: pranks, competitions, showing off your strength, roughhousing or unnecessary running.
- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures.
- Participate in any training for occupational health concerns provided by the Company.
- Self-monitor for signs of heat stress and report any symptoms to the foreman.

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Health & Safety Representatives will:

- Be familiar with the green book, emergency procedures and work refusal procedures.
- Ensure that all personnel on site are following precautions regarding heat stress.
- Inspect the project at least once a month.
- Make recommendations or report findings about hazards to the employer.

Subcontractors will:


- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health & Safety Agreement.

Joint Health & Safety Committee members will:

- Be familiar with the Heat Stress policies and procedures.
- Ensure that workers are dressed properly for the weather.
- Ensure all personnel on site follow the proper procedures regarding heat stress and hot weather precautions.
- Make recommendations to the employer about health and safety in the workplace.
- Report any occupational health concerns to their immediate supervisor immediately.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Ensure all personnel are made aware of the cold stress policies and procedures
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through, but not limited to, Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Attend training courses to keep abreast of new requirements for the management of the occupational health program.
- Keep abreast of the updated legislation about OHSA standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Prepare field safety material as required.

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TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

Training records shall be maintained for employees involved in all aspects of legislative compliance.

The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

Safe work practices and procedures will be provided to all workers through toolbox talks and onsite training sessions.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

IHSA Construction Manual

Occupational Health and Safety Act Construction and Industrial Regulations

Safe Work Procedures


Safe Work Practices

General Safety Rules and Regulations

Emergency Response Checklist

Posted Material Checklist

Progressive Discipline Form

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CONTINUOUS IMPROVEMENT



This policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the legislative maintenance program meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
New policy creation to create stand-alone procedure	Annual Review/Create Separate procedure for auditing purposes as per the 2021 Action Plan	Feb 01, 2021	000
Policy Update Added to supervisor and worker responsibilities	Annual Review	Jan 26, 2022	001
Update Policy Revised JHSC responsibilities Added to OHS Rep & Safety Department responsibilities	Annual Review	Jan 19, 2023	002
Update Policy Added required resources section	Annual Review	Jan 24, 2024	003
Replaced eCompliance with SiteDocs	Change of safety platform	Nov 14, 2024	004
Annual Review & grammatical corrections	Annual Review	Feb 18, 2025	005

Hazardous Noise Policy	Issue Date: February 1, 2021	
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POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, subcontractors, and visitors. The purpose of this policy is to provide written guidelines for identifying and controlling health hazards in the workplace and essential to maintaining the health and safety of our employees.

King Paving & Construction Ltd. recognizes the benefits of a healthy workforce and encourages and supports workers in achieving ownership for their physical, mental, and emotional well-being, resulting in improving overall health and wellness.

SCOPE AND REGULATION

This policy pertains to any workers, visitors, subcontractors, and service providers that work for King Paving & Construction Ltd. that may be exposed to occupational health exposures.

The policy will outline the several types of health hazards that workers may be exposed to during regular work activities. Each specific type of occupational hazard listed will also provide identification of the hazard and control measures to prevent or treat the hazard if accidental exposure occurs. The Company will complete a risk assessment for occupational health hazards and provide controls to reduce the level of risk exposure to workers.

Please note: This policy works in conjunction with HSMS 15-02 Hearing Conservation Program along with the following resources:


- Occupational Health and Safety Act
- Ministry of Labour, Immigration, Training and Skills Development
- Reg. 1101
- WSIB Form 82
- WHMIS/SDS
- Ministry of the Environment

DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the Company to whom the Subcontractor is providing services for (e.g., King Paving & Construction Ltd.).

Occupational Health – Means all aspects of health and safety in the workplace and has a strong focus on primary prevention of hazards. The health of the workers has several determinants, including risk factors at the workplace leading to cancers, accidents, musculoskeletal diseases, respiratory diseases, hearing loss, circulatory diseases, stress-related disorders and communicable diseases and others.

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Occupational Health Surveillance – Provides information on where, how, and why workers get sick or hurt on the job. This information is used to improve workers' health and safety through appropriate prevention activities. Workplace injuries and illnesses can be prevented by control or elimination of hazards.

Occupational Disease – An occupational disease is any chronic ailment that occurs because of work or occupational activity.

Medical Surveillance – Is the systematic assessment of employees exposed or potentially exposed to occupational hazards. This assessment monitors individuals for adverse health effects and determines the effectiveness of exposure prevention strategies.

Competent Person – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance,
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge of any potential or actual danger to health or safety in the workplace.

Supervisor – Means a person who has charge of a workplace or authority over a worker.

Qualified Person – Is deemed to be qualified due to training and experience with the inspection and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

Worker – A person who performs work or supplies services for monetary compensation. Other persons who work or provide services to an employer for no money, who may be prescribed by regulation includes an unpaid intern, co-op students, and certain other learners.


REQUIRED RESOURCES:

- Hearing Protection (ear plugs and muffs)
- P.P.E. training
- Knowledge of this policy and HSMS 15-02 Hearing Conservation Program
- Knowledge of the noise levels that are generated by equipment and tasks

NOISE

Standard

All workers working in a noisy environment are required to use and wear hearing protection. Audiometric testing may be required based on the specific jurisdiction. If not certain, please consult with the Health & Safety Department.

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Procedure


Noise in excessive amounts is a known health hazard. Exposure to excessive noise leads to permanent hearing loss in most cases. Employees exposed to noise levels greater than 85 dBA require adequate hearing protection for the hazard.

Noise exposure guidelines for work related activities at the operator position are:

Piece of Equipment	dBA
Radial Saw 10" Steel Blade	90-95
Cut-Off Saw 8" Steel Blade	85-95
Hand Grinder 6" Stone	101-105
Jackhammer 80lbs	96-100
Chipping Air Hammer	106-110
Metal Cut-Off Saw 12" Fibre	111-115
Arc Welding	96-100
Automatic Welding	96-100
Explosive Actuated Tools	Over 115
Sandblasting	96-100
Jumping Jack	111-115
Electric Drill	85 or under
Portable Grinder	90-95
Crawler Loader	101-105
Rubber Tire Loader	96-100
Compressor (250 CFM)	101-106
Compressor (250 CFM) Silenced	Less Than 85
Compressor (900 CFM)	106-110
Compressor (900 CFM) Silenced	Less Than 85

Points to Remember

- Clean plugs or muffs to prevent ear infection.
- Hearing protection makes it easier to converse in a noisy area.
- Dry cotton batting is no protection against noise.

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- Wax impregnated cotton batten and ear plugs with metal inserts **DO NOT WORK**.
- Muffs are more effective than plugs.
- Plugs come loose if you talk or chew.
- Hypo-allergenic ear plugs are available to those who require them.

ROLES AND RESPONSIBILITIES

Senior Management will:


- Assume ultimate responsibility for the development and implementation of an effective Hazardous Noise Policy.
- Allocate appropriate resources, training, and employees to implement and maintain the Hazardous Noise Policy.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Complete the pre-job hazard analysis prior to commencing work.
- Ensure that workers use the methods, procedures and equipment required by OSHA and all regulations.
- Ensure that workers use or wear equipment, protective devices, or clothing that is required by the employer.
- Ensure that the appropriate hearing protection is available to all personnel on site and that it is worn when required.
- Advise workers about actual or potential health and safety concerns.
- Maintain a Company provided logbook with daily entries as to work activities, performance management or health and safety concerns.
- Complete weekly toolbox talks, and other training material as directed or required for site specific.
- Prepare a site emergency plan. This plan must be communicated to all workers and discussed at the JHA.
- Take progressive disciplinary measures for workers and subcontractors who do not meet the legislative standards.
- Complete assigned training to assist in the identification, developing controls and monitoring of occupational health concerns on the jobsites.

Workers will:

- Comply with the health and safety legislation.
- Wear the appropriate hearing protection when required.
- Be familiar with the hazardous noise policy and procedures.

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- Report any violations of the OHSA, any defective equipment, or any workplace hazard to the employer or supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures.
- Participate in any training for occupational health concerns provided by the Company.

Health & Safety Representatives will:

- Be familiar with the green book, emergency procedures and work refusal procedures.
- Ensure that the hazardous noise policy and procedures are being followed and that all personnel wear hearing protection where required.
- Make recommendations or report findings about hazards to the employer.

Subcontractors will:


- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health & Safety Agreement.

Joint Health & Safety Committee members will:

- Identify actual and potential hazards in the workplace. Pay close attention to noise producing sources and duties.
- Ensure all personnel wear hearing protection where required.
- Make recommendations to the employer about health and safety in the workplace.
- Report any occupational health concerns to their immediate supervisor immediately.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Hazardous Noise Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through, but not limited to, Safety Day, Toolbox Talks or onsite training.
- Ensure that the appropriate hearing protection is available at all sites.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Attend training courses to keep abreast of new requirements for the management of the occupational health program.

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- Keep abreast of the updated legislation regarding OSHA standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Prepare field safety material as required.

TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

Training records shall be maintained for employees involved in all aspects of legislative compliance.

The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

Safe work practices and procedures will be provided to all workers through toolbox talks and onsite training sessions.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES


IHSA Construction Manual

Occupational Health and Safety Act Construction and Industrial Regulations

Safe Work Procedures

Safe Work Practices

General Safety Rules and Regulations

Hazardous Noise Policy	Issue Date: February 1, 2021	
	Revision Date: February 18, 2025	
Policy Number: HSMS 15-09	Revision Number: 005	
	<p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Approved By: President</i></p>	

Emergency Response Checklist

Posted Material Checklist

Progressive Discipline Form

HSMS 15-02 Hearing Conservation Program

CONTINUOUS IMPROVEMENT

This policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the Hazardous Noise Policy meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
New policy creation to create stand-alone procedure	Annual Review/Create Separate procedure for auditing purposes as per the 2021 Action Plan	Feb 01, 2021	000
Update Policy Added to supervisor, worker, and H&S Department responsibilities	Annual Review	Jan 26, 2022	001
Update Policy Revised Foreman, Safety Rep, JHSC Member and H&S Department responsibilities	Annual Review	Jan 19, 2023	002
Update Policy Added required resources section	Annual Review	Jan 24, 2024	003
Replaced eCompliance with SiteDocs	Change to a new safety platform	Nov 14, 2024	004
Annual Review	Annual Review	Feb 18, 2025	005

Musculoskeletal Disease Policy	Issue Date: February 1, 2021	
	Revision Date: February 24, 2025	
Policy Number: HSMS 15-16	Revision Number: 005	
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POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, subcontractors, and visitors. The purpose of this policy is to provide written guidelines for identifying and controlling health hazards in the workplace and essential to maintaining the health and safety of our employees.

King Paving & Construction Ltd. recognizes the benefits of a healthy workforce and encourages and supports workers in achieving ownership for their physical, mental, and emotional well-being, resulting in improving overall health and wellness.

SCOPE AND REGULATION

This policy pertains to any workers, visitors, subcontractors, and service providers that work for King Paving & Construction Ltd. that may be exposed to occupational health exposures.

The policy will outline the several types of health hazards that workers may be exposed to during regular work activities. Each specific type of occupational hazard listed will also provide identification of the hazard and control measures to prevent or treat the hazard if accidental exposure occurs. The Company will complete a risk assessment for occupational health hazards and provide controls to reduce the level of risk exposure to workers.

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- Ministry of Labour
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For this policy, the following definitions will be used.

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Occupational Health Surveillance – Provides information on where, how, and why workers get sick or hurt on the job. This information is used to improve worker health and safety through appropriate prevention activities. Workplace injuries and illnesses can be prevented by control or elimination of hazards.

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MUSCULOSKELETAL PREVENTION PROCEDURES

Standard

Ergonomics is the study of interaction between work and people. Workers in many jobs are at risk for musculoskeletal disorders due to hazards or risk factors in the workplace. An MSD (Musculoskeletal Disorder) is an injury or disorder that occurs over time because of repetitive, forceful or awkward body movements or static or awkward postures. These activities can over time result in injury to the muscles and joints.

Musculoskeletal Disorders

Musculoskeletal Disorder (MSD) is also known as Cumulative Trauma Disorder (CTD) and Repetitive Stress Injury (RSI). An MSD can damage muscles, tendons, and nerves of the neck, shoulder, forearm, hands, legs and back.

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Damage can also occur in other parts of the body. An MSD can cause pain, weakness, numbness, or difficulty in grasping objects. Examples include back pain, carpal tunnel syndrome, bursitis, trigger finger, tendonitis, and rotator cuff disorder.

Symptoms of an MSD

- Pain
- Swelling, inflammation
- Numbness or tingling sensation
- Decreased movement of a joint
- Stiffness of body part
- Symptoms worsen with time

Risk Factors of an MSD

Awkward or Static Posture (Prolonged or Frequent)

An awkward body posture is any change from a neutral position e.g., bending, stooping, twisting, reaching above the shoulders, reaching behind, and bending the wrist forward, backward or side to side.

Repetition

Performing the same motion for too often, too quickly or for too long a period causes stress to joints and muscles. This type of work results in muscle and joint fatigue and can result in injury.

Contact Stress

If the force required for completing the work overloads the muscles, joints, and other soft tissues it can cause injury. Excessive force can be created by; long reaches, lifting heavy weights, improper gripping, and excessive contact such as carrying a heavy coil of cable over one shoulder.

Local or Hand/Arm Vibration


Risk depends on level and frequency of vibration, length of exposure and whether awkward postures are involved.

Cold Temperatures

Flexibility is decreased, muscles do not work as efficiently. There is decreased blood flow to the muscles and joints.

Hot Work Environments

Can lead to muscle fatigue due to dehydration and errors in how work is performed.

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Work Organization and Work Methods

Refers to work pacing, worker rotation and scheduling, potential complacency or monotony of tasks, physical and mental demands of the task, level of training and supervision.

Implementing Controls

General Principles

- Use handling equipment when possible.
- Avoid lifting loads on or near the floor.
- Minimize working near the floor level.
- Move small weights often rather than heavy weights once.
- Regularly stretch muscles.
- Rotate workers to share monotonous, demanding, or repetitive tasks.

Specific Controls

Hand Tools

- Choose tools with vibration reducing features.
- Choose tools that are lighter and reduce hand torque and kickback.
- Make sure tools are balanced and do not require extra muscular effort.
- Choose tools with triggers that allow for multiple fingers.
- Inspect and maintain tools regularly. Replace old worn tools.

Pushing and Pulling


- Make sure handles on carts are adjustable to allow for different worker heights.
- Use larger wheels on carts to reduce push or pull forces.
- Design work to avoid having to push or pull material up slopes or in crowded spaces.
- Push rather than pull carts.

Heavy, Frequent and Awkward Lifting

- Use mechanical aids to lift, lower objects/materials.
- Keep loads close to the body.
- Split large loads into smaller loads.
- Plan lifting activities including clearing paths of obstacles and paying attention to good housekeeping.

Fixed or Awkward Postures

- Adjust height of adjustable workstations.
- Use anti-fatigue matting.
- Place materials at suitable heights and bring closer to the actual work activity area to avoid long reaches.

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- When working in cramped positions, allow time to stretch and change position.
- If possible, use devices for overhead work.

Repetition

- Implement job rotation.
- Increase the variety of activities.
- Includes flexibility and encourage micro breaks.

Cold Temperatures

- Ensure workers wear appropriate outdoor clothing including well-fitting, insulated gloves.
- Store tools in warm area if possible while not using.
- Provide breaks in warm areas.
- Provide portable heating if practical.
- Encourage workers to stay hydrated.

Warm Temperatures

- Rotate workers to allow for cooling breaks.
- Encourage workers to stay hydrated.

Work Organization and Work Methods

- Allow rest/recovery from demanding/repetitive tasks.
- Provide work variability.
- Ensure work pace and demands are appropriate.
- Provide training on MSDs, hazards, and controls.


Ergonomics for the Office Environment

Ergonomics can be defined as fitting the job to the worker. All workers are not the same size, and everyone has different tolerances and limits.

Ergonomics is applied to the design of workstations, work processes, equipment, and tools to fit the worker to minimize risk factors that may lead to musculoskeletal injury.

Proper Workplace and Workstation Design

A properly designed workplace helps the worker maintain good body posture and minimizes forces on the body. The workstation should be appropriate for the job and fit the worker's body size and shape.

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Standing at Work

Generally, the work surface should be at elbow height with the work placed in front of the worker so there is no need to twist or reach. Use of a foot rail or footrest allows the worker to shift some of their body weight and rest muscles and joints. Anti-fatigue mats may provide cushioning for hard floors.

Sitting at Work

Chair, desk, computer, or a workbench all affects the worker's body position. The chair should be adjustable so that feet rest comfortably on the floor or on a footrest. Arrange workstations to allow proper back support (i.e., position keyboard or monitor closer to user). Arm rests should be adjusted to support the forearms and prevent hunching.

"Ideal" Sitting Posture for Computer Work


- Wrists: Naturally, straight position; not bent up, down, or from side to side.
- Elbows: Bent between 90 and 100 (right angle), close to your body and supported if possible.
- Shoulders: Relaxed (not slouched or raised).
- Neck: Facing forward and not looking up, down, or to either side.
- Hips: Bent around 90 with your thighs roughly parallel to the floor.
- Low Back: Supported to maintain its natural curve.
- Knees: Bent at about 90 with enough space between the back of your knees and the chair to place your fist.
- Feet: Placed flat on the floor or supported by a footrest.

Preventing MSDs in the Office

- Workers should stand up and get away from the desk and/or computer regularly throughout the day.
- Muscles work best when the body joints are in "neutral" positions. Workers should not remain in any one position (seated or otherwise) for long periods of time.
- Getting up and walking around, even short distances, throughout the day helps to reduce stress by improving circulation in the muscles and the spine.
- Micro-breaks are useful to allow muscles and joints a rest. Other daily tasks, such as filing and delivering, can be done while taking a break away from the computer.

Chair Position

- Adjust the backrest so the low back support contacts the curve in the back and gives support in that area.
- Adjust armrests so that elbows can rest comfortably on the rests, and shoulders are level and relaxed.
- Lower the seat pan so feet rest comfortably on the floor.
- Chair height should be adjusted to allow for typing comfortably with "ideal" wrist and arm positions. A footrest can be used if feet do not rest flat on the floor after chair adjustment.

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Keyboard and Mouse

- Keyboard and mouse should be slightly below elbow level and close to the body. The mouse should be right beside the keyboard, and in front of the mousing hand.
- To reduce stress on the hand, try to use the mouse with the opposite hand. This reduces the stress placed on one arm and frees the dominant hand to perform other tasks.
- Try moving the arm and shoulder rather than only the hand when mousing.

Monitor and Document Holder

- Document holders help keep papers vertical or angled so the neck does not have to bend to read them.
- The document holder should be the same distance from the eyes as the computer screen.
- The monitor and keyboard should be directly in front of the worker.
- The top of the monitor and document holder should be around eye level when sitting comfortably.
- The monitor should be about arm's length away at a comfortable reading distance.
- The monitor should be angled slightly up toward the eyes. Angling the monitor up too high can increase glare.
- Eyesight naturally falls about 20 degrees down from the horizontal, the top of the screen should be placed around eye level. Line of sight should naturally fall to the middle of the screen.
- If the worker wears bifocals or trifocals, it's especially important to properly adjust monitor height. Tilting the head back to view the screen through the lower portion of the glasses could lead to muscle fatigue in the neck and back. Instead, try lowering the monitor.

HAND-ARM-VIBRATION SYNDROME (HAVS) PROCEDURES

Standard


All workers exposed to tools that vibrate need to be aware of Hand-Arm-Vibration Syndrome (HAVS) and the effects.

Hand-Arm-Vibration is the transfer of vibration from a tool to a worker's hands and arms. The level of HAV is determined by measuring the acceleration of the tool or object grasped by the worker.

HAVS is a disease that involves circulatory disturbances, sensory and motor disturbances, and musculoskeletal disturbances.

Exposure

Daily exposure to hand and arm vibration by workers who use vibrating tools powered by compressed air, gasoline, or electricity (e.g., powered hammers, jackhammers, chisels, chainsaws, sanders, grinders, riveters, breakers, drills, compactors, sharpeners and shapers) can cause physical damage to the hands and arms.

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Symptoms

- Bluish discoloration (cyanosis) of the skin, fingers, and hands.
- Whitening (blanching) of fingertips after cold or damp exposure (known as Raynaud's phenomenon).
- Numbness, with or without tingling happens, before, during or after blanching.
- Attacks, more common in winter, but eventually may occur year-round.
- The palms of the hands are rarely affected.
- Sense of touch and pain perception reduced, sometimes forever.
- Decreased grip strength, and inability to sustain muscle power.

Prevention

Reducing the incidence of HAVS requires numerous actions. Some recommendations to prevent HAVS are:


- Provide adequate rest breaks away from vibrating tools (e.g., reduce exposure hours, decrease the number of days exposed to vibrating tool by job rotation).
- Follow manufactures instructions on proper use of equipment (e.g., do not remove hand grips on grinders).
- Design tools to minimize vibration.
- Design tools to keep hands warm (e.g., heated handles, relocate air vents).
- Use ergonomic design to reduce grip force, awkward posture, etc.
- Perform routine medical checks of those at risk. Record all signs and reported symptoms.
- Warn workers of health risks.

NOTE: There is no therapy at present for neurological symptoms other than removal from vibration exposure, but improved circulation may help with nerve recovery.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Musculoskeletal Health Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Musculoskeletal Health Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.


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Foremen/Supervisors/Managers/Superintendents will:

- Complete the pre-job hazard analysis prior to commencing work.
- Ensure that workers use the methods, procedures and equipment required by OSHA and all regulations.
- Ensure that workers use or wear equipment, protective devices, or clothing that is required by the employer.
- Advise workers about actual or potential health and safety concerns including possible risks of musculoskeletal disorders
- Give workers written instructions on the measures and procedures to protect themselves, when required. Ensure SDS binders are available to all workers and emergency response personnel on jobsites.
- Take every precaution reasonable to protect the workers.
- Supervise workers personally or have an assistant, who is a competent person do so.
- Inspect the workplace, equipment, and tools weekly.
- Ensure all required posting are available in the construction trailers or Health and Safety binders.
- Maintain a Company provided logbook with daily entries as to work activities, performance management or health and safety concerns.
- Complete weekly toolbox talks, and other training material as directed or required for site specific.
- Prepare a site emergency plan. This plan must be communicated to all workers and discussed at the JHA.
- Take progressive disciplinary measures for workers and subcontractors who are not meeting the legislative standards.
- Complete assigned training to assist in the identification, developing controls and monitoring of occupational health concerns on the jobsites.

Workers will:

- Comply with the health and safety legislation.
- Never use or operate equipment in a way that could put yourself or other workers in danger.
- Never remove or make ineffective any protective devices.
- Be familiar with the Musculoskeletal Disease Policy.
- Select worker representatives for the JHSC.
- Report any violations of the OSHA, any defective equipment, or any workplace hazard to the employer or supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Never engage in horseplay on site. Includes, but not limited to the following: pranks, competitions, showing off your strength, roughhousing or unnecessary running.
- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures. Refer to the SDS binder whenever handling chemicals.
- Participate in any training for occupational health concerns provided by the Company.

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Health & Safety Representatives will:

- Be familiar with the green book, emergency procedures and work refusal procedures.
- Be familiar with the Musculoskeletal Health Program.
- Inspect the project at least once a month.
- Make recommendations or report findings about hazards to the employer.

Subcontractors will:


- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health & Safety Agreement.

Joint Health & Safety Committee members will:

- Identify actual and potential hazards in the workplace.
- Be familiar with the Musculoskeletal Health Program.
- Inspect the workplace at least once a month or if that is not practical inspect part of the workplace in accordance with a schedule agreed upon by the committee and the employer.
- Makes recommendations to the employer about health and safety in the workplace.
- Report any occupational health concerns to their immediate supervisor immediately.
- Is composed of an equal number of worker and employer representatives.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the MSD Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through, but not limited to, Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Attend training courses to keep abreast of new requirements for the management of the occupational health program.
- Keep abreast of the updated legislation regarding OSHA standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Prepare field safety material as required.

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TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

Training records shall be maintained for employees involved in all aspects of legislative compliance.

The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

Safe work practices and procedures will be provided to all workers through toolbox talks and onsite training sessions.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

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CONTINUOUS IMPROVEMENT

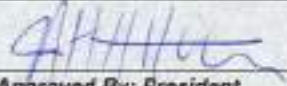
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Update Policy	Annual Review	Jan 24, 2024	003
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Update Policy & corrected grammatical errors	Annual Review	Feb 24, 2025	005

Back Care Policy	Issue Date: February 1, 2021	
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Worker – A person who performs work or supplies services for monetary compensation. Other persons who work or provide services to an employer for no money, who may be prescribed by regulation includes an unpaid intern, co-op students, and certain other learners.

BACK CARE PROCEDURES

Standard


Construction work puts physical stress on the body. About half of the back injuries are attributed to lifting excessive weight or lifting incorrectly and the rest are the result of slips, trips and falls. Most back injuries are the result of everyday wear and tear rather than a single traumatic event.

Procedure

Employ an exercise program to protect your spine, the muscle supporting your back must be strong and flexible. A pre-work stretching program is recommended. Warming up prepares your body for the physical work ahead and helps minimize the risk of injury.

The three essentials are Warm-up, Workout, and Cool-Down.

Remember – Check with your doctor before starting any exercise program.

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Workplace Posture: Maintaining a proper posture is the most critical part of good back care. Using our muscular system to control posture minimizes the effects of everyday wear and tear on our spine. Any position held too long is not good for your back. Aches and pains from prolonged working postures are our body's way of warning you to change position. If these warnings are continuously ignored, you will be vulnerable to low back injury.

Lifting: A weight that is too heavy, lifting in awkward position, twisting your body while lifting, or doing excessively heavy work are all common causes of low back problems. When lifting, plan your move, size up the load and make sure your path is clear or get help if needed or use other material handling equipment if possible.

Material Handling Equipment: Different types of equipment have been designed and manufactured to lift and move loads of various shapes, sizes, and weights. This equipment can not only save time and labour – it can save your back.

Hoisting or Moving Heavy Loads: Special equipment is often required to hoist or move heavy loads manually. Devices from simple levers and rollers to more complicated chain hoists and derricks can handle loads that would otherwise be difficult to move. The mechanical advantage afforded by this equipment reduces the manual effort involved as well the risk of back injury.


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Back Care Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Back Care Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Complete the pre job hazard analysis prior to commencing work.
- Identify all types of work that may pose the risk of causing injury to the back.
- Ensure that workers use the methods, procedures and equipment required by OSHA and all regulations.
- Ensure that workers use or wear equipment, protective devices, or clothing that is required by the employer.
- Advise workers about actual or potential health and safety concerns.
- Give workers written instructions on the measures and procedures to protect themselves, when required.
- Take every precaution reasonable to protect the workers.
- Supervise workers personally or have an assistant, who is a competent person do so.

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- Inspect the workplace, equipment, and tools weekly.
- Ensure all required postings are available in the construction trailers or Health and Safety binders.
- Maintain a company provided supervisor's logbook with daily entries as to work activities, performance management or health and safety concerns.
- Complete weekly toolbox talks, and other training material as directed or required for site specific.
- Prepare a site emergency plan. This plan must be communicated to all workers and discussed at the JHA.
- Take progressive disciplinary measures for workers and subcontractors who do not meet the legislative standards.
- Complete assigned training to assist in the identification, developing controls and monitoring of occupational health concerns on the jobsites.

Workers will:


- Comply with the health and safety legislation.
- Never use or operate equipment in a way that could put yourself or other workers in danger.
- Identify all types of work that may pose the risk of causing injury to the back.
- Never remove or make ineffective any protective devices.
- Report any violations of the OSHA, any defective equipment, or any workplace hazard to the employer or supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Never engage in horseplay on site. Includes, but not limited to the following: pranks, competitions, showing off your strength, roughhousing or unnecessary running.
- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures. Refer to the SDS binder whenever handling chemicals.
- Participate in any training for occupational health concerns provided by the Company.

Health & Safety Representatives will:

- Be familiar with the green book, emergency procedures and work refusal procedures.
- Be familiar with the Back Care Program.
- Inspect the project at least once a month.
- Make recommendations or report findings about hazards to the employer.

Subcontractors will:

- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health and Safety Agreement.

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Joint Health & Safety Committee members will:

- Identify actual and potential hazards in the workplace.
- Be familiar with the Back Care Program.
- Inspect the workplace at least once a month or if that is not practical inspect part of the workplace in accordance with a schedule agreed upon by the committee and the employer.
- Make recommendations to the employer about health and safety in the workplace.
- Report any occupational health concerns to their immediate supervisor immediately.
- Ensure the committee is composed of an equal number of workers and employer representatives.

Health & Safety Department will:

- Ensure that the Back Care Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through, but not limited to, Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Attend training courses to keep abreast of new requirements for the management of the occupational health program.
- Keep abreast of the updated legislation regarding OHS standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Prepare field safety material as required.


TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

Training records shall be maintained for employees involved in all aspects of legislative compliance.

The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

Safe work practices and procedures will be provided to all workers through toolbox talks and onsite training sessions.

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COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

IHSA Construction Manual

Occupational Health and Safety Act Construction and Industrial Regulations

Safe Work Procedures

Safe Work Practices

General Safety Rules and Regulations

Emergency Response Checklist

Posted Material Checklist

Progressive Discipline Form



CONTINUOUS IMPROVEMENT

This policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the Back Care Policy meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Sanitation, Hygiene and Lunchroom Cleaning Policy	Issue Date: February 1, 2021	
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Policy Number: HSMS 15-18	Revision Number: 005	
 Approved By: President		

POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, subcontractors, and visitors. The purpose of this policy is to provide written guidelines for identifying and controlling health hazards in the workplace and essential to maintaining the health and safety of our employees.

King Paving & Construction Ltd. recognizes the benefits of a healthy workforce and encourages and supports workers in achieving ownership for their physical, mental, and emotional well-being, resulting in improving overall health and wellness.

SCOPE AND REGULATION

This policy pertains to any workers, visitors, subcontractors, and service providers that work for King Paving & Construction Ltd. that may be exposed to occupational health exposures.

The policy will outline the several types of health hazards that workers may be exposed to during regular work activities. Each specific type of occupational hazard listed will also provide identification of the hazard and control measures to prevent or treat the hazard if accidental exposure occurs. The Company will complete a risk assessment for occupational health hazards and provide controls to reduce the level of risk exposure to workers.

- Occupational Health and Safety Act
- Ministry of Labour
- Reg. 1101
- WSIB Form 82
- WHMIS/SDS
- Ministry of the Environment
- Construction Projects regulation (O. Reg 213/91) section 28.1


DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the Company to whom the Subcontractor is providing services for (e.g., King Paving & Construction Ltd.).

Occupational Health – Means all aspects of health and safety in the workplace and has a strong focus on primary prevention of hazards. The health of the workers has several determinants, including risk factors at the workplace leading to cancers, accidents, musculoskeletal diseases, respiratory diseases, hearing loss, circulatory diseases, stress-related disorders and communicable diseases and others.

Occupational Health Surveillance – Provides information on where, how, and why workers get sick or hurt on the job. This information is used to improve worker health and safety through appropriate prevention activities. Workplace injuries and illnesses can be prevented by control or elimination of hazards.

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Occupational Disease – An occupational disease is any chronic ailment that occurs because of work or occupational activity.

Medical Surveillance – Is the systematic assessment of employees exposed or potentially exposed to occupational hazards. This assessment monitors individuals for adverse health effects and determines the effectiveness of exposure prevention strategies.

Menstrual Products - means tampons and menstrual pads.

Competent Person – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance,
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge of any potential or actual danger to health or safety in the workplace.

Supervisor – Means a person who has charge of a workplace or authority over a worker.

Qualified Person – Is deemed to be qualified due to training and experience with the inspection and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

Worker – A person who performs work or supplies services for monetary compensation. Other people who work or provide services to an employer for no money, who may be prescribed by regulation includes an unpaid intern, co-op students, and certain other learners.

SANITATION, HYGIENE AND LUNCHROOM PROCEDURES


Standard

Adequate sanitation and hygiene facilities shall be provided at all workplaces as required by legislative standards. Consult the Health & Safety Department.

Procedure

The King Paving and any other constructor/prime contractor shall ensure that adequate sanitation and hygiene is available. KING will provide onsite toilet facilities for any project that is one week or more in duration for construction and road building projects.

- Washroom and cleanup facilities shall be readily available and used as per the regulatory requirements in your area.
- Women and men shall have separate facilities.
- Wash-up facilities with clean water, soap and individual towels shall be available nearby on all projects. If no water is available, waterless soap is satisfactory.
- A reasonable supply of fresh potable drinking water shall be supplied. Disposable cups shall be made available (when required).

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- Lunchrooms/trailers shall be kept in a clean, tidy condition.
- Your vehicle may be your lunch area.
- Care should be taken to ensure that work coveralls and other clothing do not contaminate the lunchroom area.
- Perishable foods must not be allowed to accumulate in lunchrooms.
- Lunchroom fridges and microwaves must be used for food use only.
- Proper hand hygiene should be encouraged to control the spread of illnesses such as common colds, flus, and gastro-intestinal infections. Using soap and lathering up is very important (rinsing hands in water only is not as effective). Hands should be washed for a minimum of 20 seconds – longer if the hands are visibly soiled. When there is no soap or water available, waterless hand cleaning sanitizers may be used. These solutions should be 60% alcohol or better.
- Proper sneeze/cough etiquette i.e., coughing or sneezing into your sleeve or into a tissue will also help control spread of illness in the workplace.

Note: When handling controlled products please consult the Safety Data Sheets for cleanup procedures.

Due to changes in Construction Projects Regulation (O. Reg 213/91) section 28.1, King Paving & Construction will provide menstrual products that are reasonably accessible on construction sites of 20 or more workers who are regularly employed on a project for three months or longer. The products will be kept clean and hygienic at an accessible location where there is a reasonable amount of privacy.


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Sanitation, Hygiene and Lunchroom Cleaning Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Sanitation, Hygiene and Lunchroom Cleaning Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Complete the pre-job hazard analysis prior to commencing work.
- Ensure that all gathering areas and lunchrooms are cleaned on a regular basis and that sanitizer is available.
- Ensure that workers use the methods, procedures and equipment required by OHSA and all regulations.
- Ensure that workers use or wear equipment, protective devices, or clothing that is required by the employer.
- Advise workers about actual or potential health and safety concerns.

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- Give workers written instructions on the measures and procedures to protect themselves, when required. Ensure SDS binders are available to all workers and emergency response personnel on jobsites.
- Take every precaution reasonable to protect the workers.
- Supervise workers personally or have an assistant, who is a competent person do so.
- Inspect the workplace, equipment, and tools weekly.
- Ensure all required posting are available in the construction trailers or Health & Safety binders.
- Maintain a Company provided logbook with daily entries as to work activities, performance management or health and safety concerns.
- Complete weekly toolbox talks, and other training material as directed or required for site specific.
- Prepare a site emergency plan. This plan must be communicated to all workers and discussed at the JHA.
- Take progressive disciplinary measures for workers and subcontractors who do not meet the legislative standards.
- Complete assigned training to assist in the identification, developing controls and monitoring of occupational health concerns on the jobsites.


Workers will:

- Comply with the health and safety legislation.
- Ensure that all gathering areas and lunchrooms are cleaned on a regular basis and that sanitizer is available.
- Never use or operate equipment in a way that could put yourself or other workers in danger.
- Never remove or make ineffective any protective devices.
- Select worker representatives for the JHSC.
- Report any violations of the OHSA, any defective equipment, or any workplace hazard to the employer or supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Never engage in horseplay on site. Includes, but not limited to the following: pranks, competitions, showing off your strength, roughhousing or unnecessary running.
- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures. Refer to the SDS binder whenever handling chemicals.
- Participate in any training for occupational health concerns provided by the Company.

Health & Safety Representatives will:

- Be familiar with the green book, emergency procedures and work refusal procedures.
- Inspect the project at least once a month.
- Make recommendations or report findings about hazards to the employer.

Subcontractors will:

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- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health and Safety Agreement.

Joint Health & Safety Committee members will:

- Identify actual and potential hazards in the workplace.
- Inspect the workplace at least once a month or if that is not practical inspect part of the workplace in accordance with a schedule agreed upon by the committee and the employer.
- Ensure that all gathering areas and lunchrooms are cleaned on a regular basis and that sanitizers are available
- Make recommendations to the employer about health and safety in the workplace.
- Report any occupational health concerns to their immediate supervisor immediately.
- Ensure that the committee is composed of an equal number of worker and employer representatives.

Health & Safety Department will:


- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Sanitation, Hygiene and Lunchroom Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through, but not limited to, Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Attend training courses to keep abreast of new requirements for the management of the occupational health program.
- Keep abreast of the updated legislation regarding OSHA standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Prepare field safety material as required.

TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

Training records shall be maintained for employees involved in all aspects of legislative compliance.

The records will contain the name of the employee trained, date of training and the signature of the person who conducted the training and expiry date.

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Safe work practices and procedures will be provided to all workers through toolbox talks and onsite training sessions.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

REFERENCES

IHSA Construction Manual

Occupational Health and Safety Act Construction and Industrial Regulations

Safe Work Procedures

Safe Work Practices

General Safety Rules and Regulations

Emergency Response Checklist


Posted Material Checklist

Progressive Discipline Form

CONTINUOUS IMPROVEMENT

This policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.


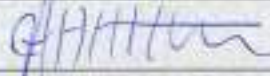
Legislative updates will be reviewed to ensure the Sanitation, Hygiene & Lunchroom Cleaning Policy meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

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The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
New policy creation to create stand-alone procedure	Annual Review/Create Separate procedure for auditing purposes as per the 2021 Action Plan	Feb 01, 2021	000
Update Policy Revised King Paving & Construction responsibilities	Annual Review	Jan 26, 2022	001
Update Policy	Annual Review	Jan 20, 2023	002
Update Policy	Annual Review	Jan 24, 2024	003
Replaced eCompliance with SiteDocs	Change to a new safety platform	Nov 14, 2024	004
Update Policy, corrected grammatical errors & added new regulation regarding menstrual products	Annual Review	Feb 24, 2025	005

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POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, subcontractors, and visitors. The purpose of this policy is to provide written guidelines for identifying and controlling health hazards in the workplace and essential to maintaining the health and safety of our workers.

King Paving & Construction Ltd. recognizes the benefits of a healthy workforce and encourages and supports workers in achieving ownership for their physical, mental, and emotional well-being, resulting in improving overall health and wellness.

SCOPE AND REGULATION

This policy pertains to any workers, visitors, subcontractors, and service providers that work for King Paving & Construction Ltd. that may be exposed to occupational health exposures.

The policy will outline the several types of health hazards that workers may be exposed to during regular work activities. Each specific type of occupational hazard listed will also provide identification of the hazard and control measures to prevent or treat the hazard if accidental exposure occurs. The Company will complete a risk assessment for occupational health hazards and provide controls to reduce the level of risk exposure to workers.

- Occupational Health and Safety Act
- Ministry of Labour
- Reg. 1101
- WSIB Form 82
- WHMIS/SDS
- Ministry of the Environment

DEFINITIONS


For this policy, the following definitions will be used.

Company – Means the Company to whom the Subcontractor is providing services for (e.g., King Paving & Construction Ltd.).

Fatigue - Extreme tiredness resulting from mental or physical exertion or illness

Occupational Health – Means all aspects of health and safety in the workplace and has a strong focus on primary prevention of hazards. The health of the workers has several determinants, including risk factors at the workplace leading to cancers, accidents, musculoskeletal diseases, respiratory diseases, hearing loss, circulatory diseases, stress-related disorders and communicable diseases and others.

Occupational Health Surveillance – Provides information on where, how, and why workers get sick or hurt on the job. This information is used to improve worker health and safety through appropriate prevention activities. Workplace injuries and illnesses can be prevented by control or elimination of hazards.

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Occupational Disease – An occupational disease is any chronic ailment that occurs because of work or occupational activity.

Medical Surveillance – Is the systematic assessment of workers exposed or potentially exposed to occupational hazards. This assessment monitors individuals for adverse health effects and determines the effectiveness of exposure prevention strategies.

Vibration – White finger (VWF), also known as hand-arm vibration syndrome (HAVS) or dead finger, is a secondary form of Raynaud's syndrome, an industrial injury triggered by continuous use of vibrating hand-held machinery.

Competent Person – Means a person who:

- Is qualified because of knowledge, training and experience to organize the work and its performance,
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge of any potential or actual danger to health or safety in the workplace.

Supervisor – Means a person who has charge of a workplace or authority over a worker.

Qualified Person – Is deemed to be qualified due to training and experience with the inspection and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.

Worker – A person who performs work or supplies services for monetary compensation. Other people who work or provide services to an employer for no money, who may be prescribed by regulation includes an unpaid intern, co-op students, and certain other learners.

FATIGUE MANAGEMENT PROCEDURE


Fatigue is a state of being tired. It can be caused by long hours of work, long hours of physical or mental activity, inadequate rest, excessive stress, and combination of these factors. The signs, symptoms and affect fatigue has on workers varies from one person to the next. However, fatigue may affect the individual worker's ability to perform mental and physical tasks.

Some work environments or industries require extended hours of work which has the potential to expose workers to fatigue related hazards.

Fatigue is not hours of service; it is a complicated combination of many factors, and it is manageable.

Fatigue Management Program (FMP)

The purpose of the FMP is to ensure that Management, Supervisors, and workers understand what fatigue is, how to recognize it, and how to proactively deal with it in the workplace. An effective FMP will include awareness of and response to fatigue issues in the workplace.

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Policy


The Company recognizes that fatigue is a factor that may affect a worker's ability to perform mental and physical tasks.

It is the policy of the Company that it will train to the best of its ability, all Management and Supervisory personnel to recognize and respond to the signs and symptoms that might impair the worker's performance due to fatigue. The supervisor will be responsible for making changes to work requirements if fatigue impairment signs are evident. All concerns should be communicated to management and changes documented, reviewed and followed up. It is the responsibility of all workers to conduct themselves at work and in their lifestyle in such a manner that they present themselves each day for work in a fit and unimpaired/unfatigued condition.

Roles & Responsibilities

Management

- To ensure the FMP is implemented throughout the company.
- Provide the necessary information about fatigue.
- Provide instruction and training.
- Communicate employer expectations.
- Monitor the effects of extended work hours.
- Support workers who are experiencing concerns with fatigue.
- Assist and advise Foremen.
- Investigate any problems and/or concerns.
- Inspect the workplace and review FMP with workers.
- Review of the FMP Supervisors.
- Ensure all workers understand the FMP.
- Conduct safety meetings discussing fatigue and the FMP.
- Promote the FMP.
- Ensure tasks are performed in a safe and healthy manner.
- Be aware of the possible risks associated with extended hours and/or consecutive days of work.
- Give workers as much notice as possible if extended hours are anticipated.
- Observe and record how individuals respond to extended hours.
- Recognize symptoms of fatigue.
- Get feedback from individual workers and the crew.
- Take prompt action if a risk develops.
- Relay information to and from Management & Workers.
- Report any FMP problems, concerns and/or issues.

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Workers

- Actively participate in FMP awareness.
- Recognize symptoms of fatigue.
- Promptly report any fatigue-related concerns.
- Report on any individual medical or personal situations which may have an influence on fatigue.
- Should get proper rest during time off.
- Identify personal stress and seek assistance if required.


Hazard Assessment

Fatigue is considered a potential hazard and should be a consideration when developing work schedules, plans and hazard assessments.

Practices

Preventative Methods for Dealing with Fatigue

- Inform all workers of the FMP.
- Minimize extended hours of work when possible.
- Schedule rest days.
- Assess and control hazards and risks.
- Provide information and assistance.
- Recognize individual and crew fatigue.
- Give as much advance notice of extended hours as possible.
- Define whether the work is urgent or not.
- Ensure workers have access to food and water.
- Take short and frequent breaks.
- Solicit short-term help to minimize the need for extended hours.
- Have workers rotate and perform various functions of short duration during extended hours.
- Perform complex tasks earlier in the shift, if possible.
- After a long day, if possible, start later the next day.
- Utilize the buddy system to facilitate fatigue awareness in the field.
- Account for workers returning from sickness, absences and/or modified work as there is the potential for an earlier onset of fatigue.
- In conjunction with workers, identify health problems which may affect a worker's ability to work extended hours i.e., diabetes.
- In remote locations consider travel time to and from work.
- Develop a method to track which workers are working extended hours and monitor.

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Awareness

Workers may be required to take part in FMP Awareness training, which will consist of reviewing some or all the following aspects, depending upon the worker's responsibilities.

- What is fatigue?
- Signs, symptoms, and consequences of fatigue.
- Roles and responsibilities.
- Preventative methods.
- Reporting procedures.
- Monitoring methods.
- Program review processes.

Monitoring Methods


- Management/supervisors to monitor days off/consecutive days off work.
- Management/supervisors to monitor crew's hours of work.
- Management/supervisors determine the need for extended hours.
- Management/supervisors are to monitor crews when working extended hours, for fatigue-related concerns.
- Managers/supervisors are to address crew members' concerns regarding working extended hours.
- Management is to monitor supervisor-worker relationships.
- Ensure everyone is aware of FMP.

FMP Review

- Periodically review FMP Policy and Procedures.
 - New worker orientation.
 - Annual safety meeting (with analysis from year-end).
 - Hazard assessments and Toolbox meetings.
 - By request.
- Compare the ratio of crews working extended hours to those who are not.
- Review and determine the reason and factors for working extended hours.
- Review the effectiveness of the FMP Awareness Program.
- Review the factors affecting the need for extended hours.
- Discuss possible alternatives to extended hours of work.

Jurisdictional Requirements

Some jurisdictions and industries have specific legislation and guidelines regarding fatigue management that must be adhered to when developing a work schedule. These regulations or guidelines shall typically state the maximum amount allowable hours worked per day and the minimum rest period between shifts.

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Please consult the Health & Safety Department for further information regarding fatigue management guidelines.


ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Fatigue Management Program.
- Allocate appropriate resources, training, and workers to implement and maintain the Fatigue Management Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.

Foremen/Supervisors/Managers/Superintendents will:

- Complete the pre-job hazard analysis prior to commencing work.
- Be aware of the signs and symptoms of fatigue.
- Ensure that workers use the methods, procedures and equipment required by OSHA and all regulations.
- Ensure that workers use or wear equipment, protective devices, or clothing that is required by the employer.
- Advise workers about actual or potential health and safety concerns.
- Give workers written instructions on the measures and procedures to protect themselves, when required. Ensure SDS binders are available to all workers and emergency response personnel on jobsites.
- Take every precaution reasonable to protect the workers.
- Supervise workers personally or have an assistant, who is a competent person do so.
- Inspect the workplace, equipment, and tools weekly.
- Ensure all required postings are available in the construction trailers or Health and Safety binders.
- Maintain a Company provided logbook with daily entries as to work activities, performance management or health and safety concerns.
- Complete weekly toolbox talks, and other training material as directed or required for site specific.
- Prepare a site emergency plan. This plan must be communicated to all workers and discussed at the JHA.
- Take progressive disciplinary measures for workers and subcontractors who do not meet the legislative standards.
- Complete assigned training to assist in the identification, developing controls and monitoring of occupational health concerns on the jobsites.

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Workers will:

- Comply with the health and safety legislation.
- Report any signs or symptoms of fatigue to their supervisor.
- Never use or operate equipment in a way that could put yourself or other workers in danger.
- Never remove or make ineffective any protective devices.
- Select worker representatives for the JHSC.
- Report any violations of the OHSA, any defective equipment, or any workplace hazard to the employer or supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Never engage in horseplay on site. Includes, but not limited to the following: pranks, competitions, showing off your strength, roughhousing or unnecessary running.
- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures. Refer to the SDS binder whenever handling chemicals.
- Participate in any training for occupational health concerns provided by the Company.

Health & Safety Representatives will:

- Be familiar with the green book, emergency procedures and work refusal procedures.
- Be familiar with the fatigue management policy.
- Inspect the project at least once a month.
- Make recommendations or report findings about hazards to the employer.

Subcontractors will:


- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health and Safety Agreement.

Joint Health & Safety Committee members will:

- Identify actual and potential hazards in the workplace.
- Be familiar with the fatigue management policy.
- Inspect the workplace at least once a month or if that is not practical inspect part of the workplace in accordance with a schedule agreed upon by the committee and the employer.
- Make recommendations to the employer about health and safety in the workplace.
- Report any occupational health concerns to their immediate supervisor immediately.
- Ensure that the committee is composed of an equal number of workers and employer representatives.

Health & Safety Department will:

- Ensure that the Program and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Communicate the requirements of the Program and associated procedures to all relevant parties.

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- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through, but not limited to, Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from workers.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Attend training courses to keep abreast of new requirements for the management of the occupational health program.
- Keep abreast of the updated legislation regarding OSHA standards through industry education.
- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Prepare field safety material as required.

TRAINING/RECORD KEEPING

Training shall be arranged or provided by the Health & Safety Department.

Training records shall be maintained for workers involved in all aspects of legislative compliance.

The records will contain the name of the worker trained, date of training and the signature of the person who conducted the training and expiry date.


Safe work practices and procedures will be provided to all workers through toolbox talks and onsite training sessions.

COMMUNICATION

Managers/Foremen/Superintendents/Supervisors/Workers and Subcontractors will be trained in their responsibilities to communicate this policy through any of the following events:

- Scheduled meetings
- Safety communication board postings
- New worker orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using eCompliance or other means when required.

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REFERENCES

IHSA Construction Manual

Occupational Health and Safety Act Construction and Industrial Regulations

Safe Work Procedures

Safe Work Practices

General Safety Rules and Regulations

Emergency Response Checklist

Posted Material Checklist

Progressive Discipline Form

CONTINUOUS IMPROVEMENT

This policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the Fatigue Management Policy meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

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	Revision Date: February 24, 2025	
Policy Number: HSMS 15-22	Revision Number: 005	
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POLICY STATEMENT

King Paving & Construction Ltd. is committed to providing a safe and healthy work environment for all workers, subcontractors, and visitors. The purpose of this policy is to provide written guidelines for identifying and controlling health hazards in the workplace and essential to maintaining the health and safety of our employees.

King Paving & Construction Ltd. recognizes the benefits of a healthy workforce and encourages and supports workers in achieving ownership for their physical, mental, and emotional well-being, resulting in improving overall health and wellness.

SCOPE AND REGULATION

This policy pertains to any workers, visitors, subcontractors, and service providers that work for King Paving & Construction Ltd. that may be exposed to occupational health exposures.

The policy will outline the several types of health hazards that workers may be exposed to during regular work activities. Each specific type of occupational hazard listed will also provide identification of the hazard and control measures to prevent or treat the hazard if accidental exposure occurs. The Company will complete a risk assessment for occupational health hazards and provide controls to reduce the level of risk exposure to workers.

- Occupational Health and Safety Act
- Ministry of Labour
- Reg. 1101
- WSIB Form 82
- WHMIS/SDS
- Ministry of the Environment


DEFINITIONS

For this policy, the following definitions will be used.

Company – Means the Company to whom the Subcontractor is providing services to King Paving & Construction Ltd.

Occupational Health – Means all aspects of health and safety in the workplace and has a strong focus on primary prevention of hazards. The health of the workers has several determinants, including risk factors at the workplace leading to cancers, accidents, musculoskeletal diseases, respiratory diseases, hearing loss, circulatory diseases, stress-related disorders and communicable diseases and others.

Occupational Health Surveillance – Provides information on where, how, and why workers get sick or hurt on the job. This information is used to improve worker health and safety through appropriate prevention activities. Workplace injuries and illnesses can be prevented by control or elimination of hazards.

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Occupational Disease – An occupational disease is any chronic ailment that occurs because of work or occupational activity.

Medical Surveillance – Is the systematic assessment of employees exposed or potentially exposed to occupational hazards. This assessment monitors individuals for adverse health effects and determines the effectiveness of exposure prevention strategies.

Competent Person – Means a person who:

- Is qualified because of knowledge, training, and experience to organize the work and its performance,
- Is familiar with this Act and the regulations that apply to the work, and
- Has knowledge of any potential or actual danger to health or safety in the workplace.

Supervisor – Means a person who has charge of a workplace or authority over a worker.

Qualified Person – Is deemed to be qualified due to training and experience with the inspection and maintenance of the identified equipment. When required, the qualified person will hold a current license or certificate.


Worker – A person who performs work or supplies services for monetary compensation. Other persons who work or provide services to an employer for no money, who may be prescribed by regulation includes an unpaid intern, co-op students, and certain other learners.

MENTAL HEALTH AWARENESS PROCEDURES

The Company believes that healthy workers help to create a healthy organization. Greater health, safety and wellness lead to improved satisfaction and morale, which contribute to a more effective organization. This means offering a healthy, safe, and supportive work environment.

Creating a healthy, safe, and supportive work environment requires efforts including the following key elements of a healthy workplace:

- **Physical Environment:** Refers to health and safety factors of a workplace, such as noise levels, toxic substances, infection control practices, air quality, light levels, equipment, and design of work. These elements influence fatalities and workplace disabilities and need constant attention as the company introduces new technologies, makes production changes, increase productivity, and contains costs.
- **Healthy Lifestyles:** Healthy lifestyles refer to personal resource and lifestyle practices that affect health such as physical activity, eating habits, sleeping habits, smoking, alcohol, and substance abuse. It also includes how workers cope with stress, the sense of control over their work and health, and the perception that there is support in times of distress and unhappiness.
 - This element includes how well an organization helps workers to:
 - Develop and maintain healthy lifestyle practices.
 - Drop unhealthy and risky habits.
 - Make optimal use of the health care system.

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- **Mental Health and Workplace Culture:** A supportive workplace culture is the foundation of a healthy workplace. It supports and enable to other three elements. Culture is created, reinforced, and sustained by ongoing patterns of relationships and communications that are known to have an important influence on psychological and physical health and safety.
- **Corporate Social Responsibility:** All workplaces exist in a community, and it is the interrelationship between the community, the workplace and the workers that influence the health, safety and wellbeing of the organization.

Senior Management will:

- Support and encourage the practice of assessing the practices that directly or indirectly are associated with physical and mental health and safety.
- Provide resources to continuously improve and sustain a healthy workplace environment.
- Take into consideration work life balance and staff competency of employees when distributing workload.

Managers, Superintendents and Foremen will:

- Receive relevant training and development as a participative decision making.
- Respond to the specific health and safety requirements in their position description.
- Be invited to contribute their ideas, opinions, and expertise in all aspects of the work at the Company.
- Complete training in Mental Health Awareness as assigned.


Workers will:

- Be encouraged to contribute their ideas, opinions and skills to their work and the workplace.
- Be encouraged to take advantage of health programs, activities, and resources.
- Be encouraged to talk to their immediate Supervisor when they feel their physical and psychological wellbeing is challenged.

ROLES AND RESPONSIBILITIES

Senior Management will:

- Assume ultimate responsibility for the development and implementation of an effective Mental Health Program.
- Allocate appropriate resources, training, and employees to implement and maintain the Mental Health Program.
- Review the policy at least annually and approve all alterations. A signature is required on this policy as proof of approval.
- Review deficiencies and take actions to correct identified deficiencies.


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Foremen/Supervisors/Managers/Superintendents will:

- Complete the pre-job hazard analysis prior to commencing work.
- Be aware of the possibility of mental health issues that may present themselves and inform workers on the reporting procedures and the help that may be available.
- Ensure that workers are aware that reporting mental illness issues will be treated with respect and dignity, and at the request of the worker, will be treated as confidential.
- Ensure that workers use the methods, procedures and equipment required by OHSA and all regulations.
- Ensure that workers use or wear equipment, protective devices, or clothing that is required by the employer.
- Advise workers about actual or potential health and safety concerns.
- Give workers written instructions on the measures and procedures to protect themselves, when required. Ensure SDS binders are available to all workers and emergency response personnel on jobsites.
- Take every precaution reasonable to protect the workers.
- Supervise workers personally or have an assistant, who is a competent person do so.
- Inspect the workplace, equipment, and tools weekly.
- Ensure all required postings are available in the construction trailers or Health and Safety binders.
- Maintain a Company provided logbook with daily entries as to work activities, performance management or health and safety concerns.
- Complete weekly toolbox talks, and other training material as directed or required for site specific.
- Prepare a site emergency plan. This plan must be communicated to all workers and discussed at the JHA.
- Take progressive disciplinary measures for workers and subcontractors who do not meet the legislative standards.
- Complete assigned training to assist in the identification, developing controls and monitoring of occupational health concerns on the jobsites.

Workers will:

- Comply with the health and safety legislation.
- Report any signs or symptoms which may indicate mental health issues may exist.
- Never use or operate equipment in a way that could put yourself or other workers in danger.
- Never remove or make ineffective any protective devices.
- Select worker representatives for the JHSC.
- Report any violations of the OHSA, any defective equipment, or any workplace hazard to the employer or supervisor immediately.
- Use or wear the equipment, protective devices or clothing that is required by the employer.
- Never engage in horseplay on site. Includes, but not limited to the following: pranks, competitions, showing off your strength, roughhousing or unnecessary running.

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- Participate in a daily JHA to be made aware of hazards, controls, and emergency procedures. Refer to the SDS binder whenever handling chemicals.
- Participate in any training for occupational health concerns provided by the Company.

Health & Safety Representatives will:

- Be familiar with the green book, emergency procedures and work refusal procedures.
- Be familiar with the mental health policy.
- Inspect the project at least once a month.
- Make recommendations or report findings about hazards to the employer.

Subcontractors will:


- Comply with the Company's safety rules.
- Follow guidelines as outlined in the Subcontractor's Health and Safety Agreement.

Joint Health & Safety Committee members will:

- Identify actual and potential hazards in the workplace.
- Be familiar with the mental health policy.
- Inspect the workplace at least once a month or if that is not practical inspect part of the workplace in accordance with a schedule agreed upon by the committee and the employer.
- Make recommendations to the employer about health and safety in the workplace.
- Report any occupational health concerns to their immediate supervisor immediately.

Health & Safety Department will:

- Ensure that the Mental Health Policy and relevant operating procedures are maintained and amended in accordance with changes to legislative requirements and operating conditions of the jobsites or workplace.
- Assist in cases where mental health may be an issue.
- Communicate the requirements of the Program and associated procedures to all relevant parties.
- Complete formal field audits to ensure compliance with the policy requirements.
- Ensure that the requirements of the Program are periodically embedded in safety forums to ensure a continued understanding of the roles and responsibilities of all relevant parties are effectively communicated. This can be achieved through, but not limited to, Safety Day, Toolbox Talks or onsite training.
- Promote feedback and recommendations from employees.
- Review and advise on the audit results and findings.
- Assist in revisions to the Program, as required.
- Attend training courses to keep abreast of new requirements for the management of the occupational health program.
- Keep abreast of the updated legislation regarding OSHA standards through industry education.

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- Be responsible for updating the policy on an annual basis with Senior Management and the JHSC.
- Prepare field safety material as required.

TRAINING/RECORD KEEPING

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Training records shall be maintained for employees involved in all aspects of legislative compliance.

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- New employee orientation
- Subcontractor orientation
- Posted signage
- Equipment alerts
- Toolbox talks
- Company emails
- Annual safety day

Records of communication will be recorded and stored using SiteDocs or other means when required.

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Posted Material Checklist

Progressive Discipline Form

CONTINUOUS IMPROVEMENT

This policy will be reviewed on an annual basis, jointly by Senior Management and the JHSC.

Legislative updates will be reviewed to ensure the Mental Health Policy meets the Occupational Health and Safety Act, other governing legislation, and updated company policies.

The amended policy shall be kept as a record of review and the required changes.

The revision of the policy shall be tracked at the bottom of the policy and recorded on the maintenance and tracking log.

Description of Change(s)	Reason for Change (s)	Date	Revision No.
New policy creation to create stand-alone procedure	Annual Review/Create Separate procedure for auditing purposes as per the 2021 Action Plan	Feb 01, 2021	000
Update Policy Corrected grammatical errors	Annual Review	Jan 26, 2022	001
Updated Policy Added to Safety Rep, JHSC and Health and Safety Dept. responsibilities	Annual Review	Jan 20, 2023	002
Updated Policy	Annual Review	Jan 24, 2024	003
Replaced eCompliance with SiteDocs	Changed to a new safety platform	Nov 14, 2024	004
Update Policy & corrected grammatical errors	Annual Review	Feb 24, 2025	005