SAFETY
ALWAYS
MBC

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0.1 Definitions and Abbreviations

Short	Term	Definition
-	Administrative Control	The method or process which involves identifying and implementing safe work procedures, policies, and training so workers can perform or critically assess their task duties safely.
-	Approved Subcontractor	A subcontractor with a positive safety and production record while working under MBC.
-	Circle-check	A visual and sound inspection of the accessible components of a vehicle or equipment.
-	Company Safety Meeting	A periodic safety meeting that reviews the past years performance in health and safety.
-	Controls	A mechanism used to manage, direct, or mitigate a workplace hazard. Can also be applied to the work process.
-	Construction Project	A workplace in which the construction of a building, structure, infrastructure, or the moving of a building or structure is underway.
-	Corrective Action	Action to eliminate the cause of a defect, nonconformity, or substandard condition.
-	Critical Injury	An injury of serious nature that either places a life in jeopardy, produces unconsciousness, results in substantial loss of blood, involves the fracture or amputation of a leg, arm, hand or foot (but not a finger or toe), consists of burns to a major part of the body, or causes the loss of sight in an eye.
-	Critical Task	A task that could result in catastrophic injury or death. Often associated with a very high risk rating.
-	Direct Implementation	The act of adding a variable/item to the health and safety management system.
-	Due Diligence	Reasonable steps taken by a person to satisfy a legal requirement, in this case the *Occupational Health and Safety Act.*
EWP	Elevating Work Platform	A work platform that can be self-elevated to access overhead work locations.
-	Elimination	The method or process which allows the hazardous variable of the task to be completely removed.
-	Employee	An individual working directly for MBC. Can be a Worker, Health and Safety Coordinator, Supervisor, Superintendent, Management.
-	Engineering Control	The method or process in which specifically designed or engineered work equipment, structures, or isolating barriers

		are used to prevent workers from being exposed to hazardous variables.
-	Equipment	An object, machine, tool, vehicle, or device that is necessary for a particular purpose. Ie: Skidsteer, coring rig, etc..
-	Fall Arrest System	An assembly of components joined together so that when connected to a fixed support, it can arrest (halt) a worker's fall.
FRP	Fall Rescue Plan	A plan which outlines the procedures to rescue a suspended worker.
-	Fire Triangle	The 3 variables required to start a fire: Heat, Oxygen, and Fuel.
FA	First Aid	Basic medical assistance given to a sick or injured person until full medical treatment is available.
HAVS	Hand-Arm Vibration Syndrome	An occupational disease caused by exposure to vibrations from tools and equipment, or external forces.
-	Hazard	Any source of potential damage, harm, or adverse health effects on something or someone.
-	Hazard Assessment	A process used to identify, evaluate, and control workplace hazards and the risks to worker health and safety.
-	Hazard Identification	Part of the process used to evaluate if any situation, item, thing, etc. may have the potential to cause harm.
-	Health and Safety Performance Report	A compiled document of relevant health and safety statistics over the past year. Often used in the management review process to identify trends and goals for the following year.
-	Health and Safety Program	An organized, written action plan to identify and control hazards, define safety responsibilities, and respond to emergencies that help in the prevention of accidents and occupational diseases.
HSR	Health & Safety Representative	An employee nominated by fellow non-managerial employees to work with the employer to determine and resolve any health and safety issues or concerns in the workplace.
-	Hierarchy of Controls	A guideline for processes and effectiveness of remedial and corrective measures. The most efficient being elimination, the least efficient being PPE.
-	Incident	An event resulting in either a near miss, workplace injury, or property damage.
-	Incident Investigation	An official examination of an unusual, unplanned, or undesirable event.
-	Incident Report	A document that identifies the details of an incident. (Who, What, When, Where, How)
IHSA	Infrastructure Health and Safety Association	An association that provides health and safety resources to those working in utilities, transportation, electrical, construction, and more.

-	Inherent Risk	The natural level of risk existing in a process or task BEFORE implementing controls to reduce the likelihood or severity.
-	Interim Superintendent	One who acts as a temporary replacement for a superintendent.
IRS	Internal Responsibility System	A system within an organization where everyone has a direct responsibility for health and safety as an essential part of his/her job.
JHA	Job Hazard Analysis	A risk analysis of a task which examines the hazards, needed controls, and levels of risk before and after controls are implemented.
JHSC	Joint-Health & Safety Committee	An advisory committee consisting of worker and management representatives for the purpose of improving health and safety on the project. Committees also identify potential health and safety issues and bring them to the employer's attention.
-	Likelihood	A factor used to determine risk rating/threshold. Includes both probability of an incident and frequency of the task or process.
-	Management	Those who control, coordinate, manage, and/or lead an organization or their projects.
-	Management Review	The continual improvement process of the occupational health and safety management system which involves the examination of the company's health and safety program.
MLTSD (MOL)	Ministry of Labour, Training, Immigration and Skills Development	A department of the Ontario government which regulates and is responsible for labour issues. Formerly known as MOL.
-	Muster Point	Location on a project where all personnel will meet in the event of an emergency evacuation.
-	Near Miss	A narrowly avoided workplace incident.
-	Observed Hazard	A witnessing or awareness of hazardous conditions, environment, and processes within a workplace.
OHSA	*Occupational Health and Safety Act*	Parent legislation that sets out the rights and duties, procedures, and enforcement for all parties in all workplaces within Ontario.
O. Reg 213/91	*Occupational Health and Safety Act*, Regulation 213/91	A regulation specifically for Construction Projects under the *Occupational Health and Safety Act.*
OHSMS	Occupational Health and Safety Management System	A coordinated system of procedures, processes, and other measures that is designed to promote continuous improvement in occupational health and safety. Managed by MBC.
OHS	Occupational Health and Safety	A multi-disciplinary field concerned with the safety, health, and welfare of workers.

-	OHSMS Review	A review period taking place before year end that examines the effectiveness and statistics of the MBC Health and Safety Program, policies, and procedures and drafts changes to improve them.
PEMCEP	P.E.M.C.E.P	People, Equipment, Materials, Conditions, Environment, and Process; the checklist to identify hazards.
PPE	Personal Protective Equipment	Equipment or device that is worn or used to provide protection against hazardous substances, environments, or conditions.
-	Powered Machine	A term defining equipment that requires an operator used control system or vehicle cab.
PSI/DB	Pre-site Safety Inspection/Daily Briefing	A daily meeting of a work crew outlining the tasks of the day, the hazards associated, and the controls needed to do the work safely.
-	Process Control	The modification of the task process or how the work is completed to reduce hazards or risk.
PM/PC	Project Manager/Coordinator	An organization representative that oversees, coordinates, and manages the administrative content of a project.
-	Public-way	A highway or other street, sidewalk, place, bridge, or other open spaces to which the public has access.
P. A. S. S	Pull, Aim, Squeeze, Sweep	A system to describe how to properly use a fire extinguisher.
RACE	RACE Model	Recognize, Assess, Control, Evaluate; the proper process of hazard assessment.
-	Residual Risk	The level of risk or danger remaining after mitigation controls have been implemented.
RTW	Return-to-Work	A proactive plan to help ill or injured employees return to productive and safe employment while taking into consideration physical limitations.
-	Risk Matrix	A matrix that is used during risk assessment to define the level of risk by considering likelihood and severity.
RR	Risk Rating/Threshold	A metric assigned to the level of risk associated with a task. This can be found in the risk matrix.
SJP	Safe Job Procedure	A series of specific steps that guide a worker to complete a task safely from start to finish in chronological order.
SWP	Safe Work Practice	Written methods outlining how to perform a task with minimum risk to people, equipment, materials, & environment.
-	Safety Audit	A performance measurement of a company's health and safety compliance with an established standard. This is done through formal and informal inspections that identify violations of the *Occupational Health and Safety Act.*

SDS	Safety Data Sheet	A document that contains information on the potential hazards and how to work safely with a chemical product. Formerly known as MSDS.
-	Safety Meeting/Talk	A gathering of workers, supervisors, and/or management to discuss safety topics relating to the workplace. Often done monthly.
-	Safety Orientation	The process of introducing new, inexperienced, transferred, or returning employees to a workplace.
-	Safety Survey	A management coordinated observation of health and safety compliance used to measure safety culture and awareness needs.
-	Serviceable/Unserviceable	The operating status of an object, device, equipment, thing, or tool.
-	Severity	A factor used to determine risk rating/threshold. Measures the potential damage or physical harm to a worker if an incident occurs.
-	Signage	The use of signs, posters, or images that notify workers of nearby hazards.
-	SiteDocs	A Health and Safety Management software used by MBC to complete and track safety documentation.
SSHA	Site-Specific Hazard Assessment	SSHAs identify and control unexpected hazards that cannot be anticipated in the formal hazard assessment system. These hazards are often specific to a work location.
SSSP	Site-Specific Safety Plan	A documented procedure that defines the hazards relative to a specific workplace.
-	Subcontractor	A company that is responsible for a scope of work.
-	Substitution	The method of process which allows the hazardous variable of the task to be replaced or substituted with another and less hazardous variable.
-	Superintendent	One who manages or supervises an organization, activity, or project. Responsibilities include that under Supervisor.
-	Supervisor	One who supervises a person, group, or activity. Superintendents, Foreman, Subcontractors, Management may qualify as a Supervisor.
-	Supplier	A company/person that makes a delivery of materials or supplies to site.
-	Suspension Trauma	The natural physiological response to the human body being held motionless in a vertical position for an extended period.
-	Task Analysis	A broad hazard analysis of tasks associated with the scope of work.
-	Toolbox Talk/Meeting	A weekly group discussion that focuses on a particular safety topic.

-	Trade Meeting	A meeting for the discussion of safety of the trades usually held once per month at minimum.
-	Travel Restraint System	Often used for leading edge work that is unprotected, they prevent falls by restricting the worker's movement or work area.
-	Trend Identification	The alignment of data that implicates the direction of OHS performance regarding a specific topic.
-	Unique Process/Process Control	A process or set of processes that are developed by hazard assessment often unique to safe job procedures and work environment.
-	Visitor	One who is on-site for non-work-related purposes for a short time.
-	Worker	One who is employed by an organization at a Construction Project and carries no managerial responsibilities. Organizations can include MBC, Subcontractors, Consultants, Etc.
-	Working Condition	The quality of a material, device, or thing to determine if it can be used as intended and safely.
-	Work Refusal	The process of refusing unsafe work.
-	Worker's Rights	The 3 rights of workers regarding health and safety: the right to know, the right to participate, and the right to refuse unsafe work.
-	Workplace	Any location, site, office, operated by MBC which falls under the *Occupational Health and Safety Act*. This includes all Construction Projects and head office.
WSI Act	Workplace Safety and Insurance Act	A provincial legislation designed to provide benefits, medical care, and rehabilitation services to individuals who suffer workplace injuries or contract occupational diseases.
WSIB	Workplace Safety and Insurance Board	The workplace compensation board for provincially regulated workplaces in Ontario.
WSPS	Workplace Safety and Prevention Services	An association that supports employers and workers in agricultural, manufacturing, and service sectors throughout Ontario. (Much like the IHSA for the Construction sector.)
WMSD, RSI	Work-Related Musculoskeletal Disorder	Injury or disorder of the muscles, nerves, tendons, joints, cartilage, and spinal discs, often caused or contributed to by repetitive tasks.

1 Health and Safety Program and Policy

1.1 MBC Health and Safety Program and Policy Statement

McDonald Brothers Construction Inc. (MBC) is committed to ensuring a safe and healthy workplace for all. We recognize the worker's right to a safe and healthy work environment and so our policy is structured to eliminate personal injuries, occupational illnesses, as well as damage to property, equipment, and the environment. Our primary objective is to ensure that everyone returns home safe and healthy at the end of each day.

MBC is committed to conducting a proper and regular review of all policies, procedures, and health and safety objectives. This will ensure the continual improvement and development of our occupational health and safety management system. MBC will develop this system with a safety-first approach, capturing changes in legislation to meet new and updated standards.

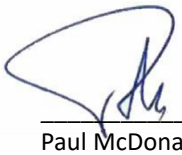
MBC is fully committed to ensuring compliance with the *Occupational Health and Safety Act* and will also ensure compliance with regulations. Furthermore, all employees, subcontractors, and visitors shall abide by MBC's Health and Safety Program.

MBC is committed to work with personnel of all levels within the organization. We believe a key factor to health and safety success lies within open communication channels between workers, supervisors, and management. We hope to maintain a working environment that demonstrates our commitment to work in the spirit of consultation and cooperation with workers and openly invites everyone within the organization to have their voice regarding health and safety.

MBC's Health and Safety Program uses an internal responsibility system to ensure the highest quality and transparency of health and safety. Workplace responsibilities for all parties can be found within the program.

It is through due diligence, integrity, initiative, and cooperation of all staff, subcontractors, and visitors that we provide a safe and healthy work environment on all our projects and meet our safety objectives.

MBC SAFETY ***ALWAYS***



_____ _____April 2, 2024_____

Paul McDonald
President

Date

1.2 Workplace Roles and Responsibilities

MBC understands the value of disclosing all workplace responsibilities and safety roles to its personnel. Each employee has obligations and procedures to reinforce a positive and reliable health and safety culture. If each person contributes their part, we can meet our health and safety objectives.
This section highlights many of the basic health and safety responsibilities by each level of the organization. There are further responsibilities within this Program. We at MBC expect all employees and contractors to commit to the goal of creating an incident free and positive health and safety culture and comply with the Occupational Health and Safety Act and Regulation 213/91.

1.2.1 All Personnel Responsibilities

- Follow and adhere to the *Occupational Health and Safety Act* and *Regulation 213/91: Construction Projects.*
- Follow and adhere to MBC's Health and Safety Program and Policy.
- Work in a manner that does not place workers or the public in any form of danger.
- Work in compliance with hazard assessments as outlined within this Program.
- Report all observed or noticeable hazards to a supervisor as soon as possible.
- Report all injuries to a supervisor immediately.
- Participate in the MBC's Health and Safety Program, meetings, and investigations as required and contribute to the development and maintenance of a positive health and safety culture.

1.2.2 McDonald Brothers Construction Inc. and Management Responsibilities

- Ensure MBC's Health and Safety Program is developed, reviewed, updated, implemented, and enforced.
- Ensure MBC's Health and Safety Program is posted in a conspicuous place that is accessible to all workers.
- Ensure all workers have access to company required legislation and regulations pertaining to their industry of work.
- Ensure workers are properly trained on and made aware of the MBC's Health and Safety Program.
- Ensure that all personnel understand their designated Health and Safety responsibilities.
- Comply and keep updated with all applicable legislation and regulations.
- Ensure safety communications and investigations are coordinated.
- Ensure that every project is reviewed, and adequate planning is conducted to provide a safe and healthy work environment.
- Create a Joint Health and Safety Committee (JHSC) and/or facilitate a worker elected Health and Safety Representative (HSR) as required by legislation.

- Ensure all substandard/unsafe acts, behaviors, and conditions, are corrected.
- Ensure workers are made aware of the potential/actual hazards present within the workplace.
- Appoint competent supervisors and ensure they have a safety-first attitude.
- Ensure that all equipment, materials, and protective devices are provided as necessary and maintained in good condition.
- Ensure workers are appropriately trained to conduct their scope of work.
- Ensure all worker training is up to date.
- Ensure new workers are introduced to MBC's Health and Safety Program via safety orientation.
- Hold all personnel accountable for their Health and Safety roles and responsibilities.
- Remain committed to creating a positive, healthy, and safe work environment. Lead by example.
- Maintain all Health and Safety documentation and recordkeeping as required by legislation.
- Ensure all posting requirements as referenced in S13 are available on the project before work begins.
- Manage a Return-To-Work Program and process for any injured or ill employees.
- Ensure there is an up-to-date and valid emergency plan for each workplace.

1.2.3 Project Manager/Coordinator Responsibilities

- Insist compliance with all applicable legislation, regulations and MBC's Health and Safety Program to all MBC personnel and subcontractors.
- Ensure subcontractors are all made aware of the MBC's Health and Safety Program, and their health and safety obligations.
- Ensure creation of a Site-Specific Safety Plan (SSSP) and a hazard analysis of the project.
- Ensure all subcontractors on the project have a completed Form 1000 prior to starting work.
- Ensure all required health and safety content, policy, and signage is provided.
- Conduct project inspections as necessary.
- (Project Managers Only) Ensure Superintendents, supervisors, foremen, and workers are complying with MBC's Health and Safety Program and conducting their due diligence.

1.2.4 Superintendent Responsibilities

- Responsibilities also include that under: *Supervisor Responsibilities.*
- Conduct monthly safety/coordination meetings with all trades and MBC workers.
- Ensure workers are regularly participating in or attending safety meetings and toolbox talks.

- Ensure all required documentation is posted and made available and accessible to all workers on projects as required by legislation.
- Ensure MBC's Health and Safety Program is being practiced and administered on site.
- Instruct and train all subcontractors to adhere to the MBC's Health and Safety Program.
- Review all accidents and near miss incidents with foremen, supervisors, and the Joint Health and Safety Committee (JHSC) or Health and Safety Representative (HSR). Ensure corrective action is taken and implemented immediately.
- Ensure a competent safety representative is elected if required by legislation.
- Take corrective actions for all observed or reported substandard safety practices or hazards.
- Assist employees in safe work practices and how to use designated Personal Protective Equipment (PPE).
- In the event the Superintendent is required to leave or be absent from site for an extended period of time, they must temporarily replace themselves with a designated Supervisor/Worker to become an interim MBC Superintendent using the Interim Superintendent Form (f1.1).

1.2.5 Supervisor/Foreman Responsibilities

- Responsible for providing safe work environment to workers under their care.
- Report any injuries or near misses to management immediately.
- Conduct a weekly toolbox talk with work crew.
- Conduct a daily Pre-Safety Inspection (PSI) with crew.
- Respond to any on-site emergency as a leader and in a well conducted manner following any emergency response procedures as outlined within MBC's Health and Safety Program.
- Ensure workers use and wear appropriate personal protective equipment and clothing in relation to their scope of work.
- Advise workers of any known hazard or potential for harm and preventive controls.
- Participate in the development of hazard assessments, and ensure workers understand the hazards and risks associated with their designated tasks.
- Take every reasonable precaution within the circumstances to protect workers from injury.
- Participate in investigations, interviews, or inquiries from the JHSC or Management.

1.2.6 Worker Responsibilities

- Abide by all legislation, regulation, and MBC's Health and Safety Program.
- Refrain from any unsafe acts that may endanger oneself or fellow workers.
- Use all personal protective equipment and safety devices provided by MBC.

- Report any identified hazards, unsafe conditions, processes, persons, or materials immediately.
- Report any injuries, accidents or near misses to a supervisor/Superintendent immediately.
- Maintain a clean and orderly workplace.
- Work in compliance with all hazard assessments for their scope of work.
- Participate in the MBC's Health and Safety Program, culture, and health promotion.
- Participate in all mandatory training and safety or review meetings.
- Inspect all PPE, tools, and machines prior to use, if damaged/defective, report to the supervisor.
- Do not commit to any task, process, or scope of work for which they are not adequately trained or are lacking sufficient knowledge to complete the task in a safe manner.

1.2.7 Subcontractor Responsibilities

- Abide by all legislation, regulation, and MBC's Health and Safety Program.
- If they are leading a crew, they are a supervisor. Include *Supervisor Responsibilities*.
- Ensure only qualified workers are provided to perform all work activities.
- Report all incidents and near misses to MBC as soon as possible.
- Report all new or previously unidentified hazards to MBC as soon as possible.
- Submit all necessary subcontractor documentation as well as sign the safety policy.
- Provide competent supervision and training for their workers.
- Will not use MBC equipment unless given specific permission to do so.
- Must provide valid proof of training and a copy of all certifications.
- Provide all SDS for materials or controlled products they plan to bring into the workplace.
- Will not subcontract any work on the project without the written consent of MBC. All subcontractors must take part of and understand MBC's Health and Safety Program.

1.2.8 Visitor/Supplier Responsibilities

- Adhere to MBC's Health and Safety Program.
- Wear all appropriate PPE as required by legislation.
- Provide all SDS for materials or controlled products to be brought into the workplace.
- Ensure proper sign-in with the Superintendent upon arrival to site.
- Review any daily briefings or hazard assessments as necessary.
- Complete site orientation as required.
- Ensure before departure that the Superintendent is notified.

1.3 Workers Rights

Workers in all industries have three basic rights to health and safety under the *Occupational Health and Safety Act.* MBC recognizes and respects these rights.

The right to know

The right to know means that as a worker, you have the right to be informed by the employer of known or likely hazards in the workplace, and to be provided with the information, instructions, education, training, and supervision necessary to protect your health and safety. This information should be provided before the work begins. Training can be workplace specific, delivered by a competent person in the workplace, online, or be provided by outside agencies as long as it meets the needs of the employer and worker for the workplace.

The right to participate

The right to participate allows workers to have input on the measures and observations of workplace hazards and the corrective actions taken by the employer to ensure health and safety. Workers can do this by:

- Participating as a member of the health and safety committee (if required).
- Participating as a health and safety representative given the opportunity.
- Reporting any concerns in the event a hazard, condition, process, material, or structure could compromise health and safety in the workplace.
- Participating in hazard assessments, incident investigations and making suggestions to the committee or employer on how to improve safety in the workplace.

The right to refuse unsafe work

The right to refuse unsafe work is normally exercised when the first two rights have failed to ensure your health and safety. Exercising the right to refuse unsafe work is not to be used as means of a work avoidance or deferral measure. If a worker exercises the right to refuse unsafe work, upon review the supervisor must do within their power to correct any unsafe condition.

If the worker is not satisfied with the supervisor's action and the workplace has a JHSC or HSR, the worker will advise them of their concerns. They will then investigate on the workers behalf and provide a decision on their findings, if they agree with the worker, they can make recommendations to the employer to take corrective action.

For more information, please visit Ontario.ca and access: "Guide to the Occupational Health and Safety Act, Part V, Right to refuse or to stop work where health and safety in danger"

1.4 Safety Responsibility Flowchart

MANAGEMENT

- Provide project with all relevant Health and Safety Documentation
- Ensure creation of a Site-Specific Safety Plan for each worksite
- Monitor and review Health and Safety Program and Management System
- Provide a safe and healthy work environment for all
- Ensure all equipment, materials and protective devices are provided and in working condition
- Ensure MBC's Health and Safety Program is communicated to workers
- Facilitate the creation of a joint-health and safety committee or designation of health and safety representative as required by legislation

Superintendent/Supervisor

- Ensure MBC's Health and Safety Program is being practiced on-site
- Ensure workers receive proper training and competency
- Hold regular toolbox talks and safety meetings
- Ensure all necessary health and safety documentation is accessible to workers

Visitor/Supplier

- Adhere to MBC's Health and Safety Program
- Wear all required PPE
- Notify superintendent of arrival and departure
- Attend site orientation
- Provide any SDS for controlled products entering the workplace

Worker

- Work safely without taking unnecessary risk
- Report hazardous/unsafe conditions
- Wear the required and proper PPE
- Voice all health and safety concerns
- Participate in the MBC's Health and Safety Program

Subcontractor

- Adhere to MBC's Health and Safety Program
- Conduct toolbox talks/safety meetings
- Provide safety information and SDS for any materials they bring to project
- Provide valid proof of training and certifications for all working personnel

2 Hazard Assessment, Analysis, and Control

2.1 Hazard Assessment Policy

McDonald Brothers Construction Inc. (MBC) acknowledges that the construction industry poses potential dangers. MBC is committed to doing all possible within the circumstances to eliminate or minimize risk and include participation of workers so they may be aware of and understand these inherent risks to their daily tasks. We are also committed to reviewing and updating our hazard assessment process and procedures as needed. Our goal is to eliminate the potential for harm to the best of our ability and create a healthy and safe work environment.

We are committed to analyzing and identifying risks and hazards within the workplace and implementing safety controls to protect the well-being of our workers. MBC is committed to maintaining a thorough documentation and reporting process and shall ensure that all hazard assessments, Safe Job Procedures (SJP), Safe Work Practices (SWP), and hazard controls are communicated and accessible to workplace parties. All hazard assessments are to be completed by a competent person or Health and Safety Representative (HSR).

Identifying hazards is the first step to controlling or eliminating risk. Methods of identification often include observations and reporting, inspections, task analysis, and trend identification. MBC recognizes primary variables that contribute to making a job hazardous are identified below:

- People
- Equipment
- Materials
- Conditions
- Environment
- Process

Some scenarios may require the worker to conduct a task specific hazard identification and risk assessment and therefore should remember the above lists. The Risk Matrix Chart will guide the assessment to determine the overall risk. Once a hazard has been assessed it can be corrected and/or controlled. Hazard control is the primary mitigation strategy to protect the worker. This section details control procedures and how to assess which controls may be necessary to complete tasks.

MBC operates with a risk priority system. Tasks described as work with the potential for critical injury are referred to as critical tasks and must be properly corrected or controlled. MBC expects the involvement of all competent workplace parties including Management, Supervisors, Workers, Consultants, and Subcontractors in the hazard assessment process.

2.2 Roles and Responsibilities

Every task has its own unique work-related hazards. Through proper hazard assessment we can reduce or eliminate the risk of work-related injury. In this regard every level of our organization has a role to play. Below are the designated roles and responsibilities to conduct proper hazard assessment, analysis, and control. MBC encourages workers to exercise their right to know, and right to participate and engage in the hazard assessment process.

Management

- Ensure a site-specific hazard assessment is conducted before the project begins, and all relevant information is to be included in the SSSP and trained to all Workers on project.
- Review typical and common hazards within their projects.
- Ensure that Superintendents and supervisors are doing their due diligence and workers are participating in the hazard assessment process.
- Direct the creation and review of SJPs and SWPs from referencing all on-site hazard assessments and make them accessible to all workers.
- Allocate necessary resources and controls to eliminate or reduce hazards on-site.
- Ensure and approve of all hazard controls that are readily available to be put in place.

Superintendent

- Responsibilities include that under: *Supervisor.*
- Conduct a site-specific hazard assessment for the workplace, and regularly review and revise with management upon significant changes to the work environment or procedures.
- Ensure workers are made aware of any hazards, JHA's, and SJP's.
- Ensure hazard assessment knowledge, content, and information is included in the regular safety meetings and toolbox talks.
- Maintain proper record of all JHAs and PSIs and make them accessible to workers.

Supervisor/Foreman

- Ensure that all workers are properly implementing the necessary control measures to protect themselves from hazards.
- Conduct Pre-Safety Inspections (PSI) daily with crew.
- Conduct JHA for tasks with a risk rating of Very High and receive worker signatures to verify they have received and understand the risks and necessary controls associated with the task.
- Prior to commencement of work, review available JHAs, PSIs, or SJPs/SWPs with workers assigned to the workplace and ensure they understand risks and necessary controls associated with the task.
- If a task cannot be controlled by regular means report the situation and hazard assessment documentation to the Superintendent, JHSC, or HSR.

Worker

- Review, familiarize, and follow all hazard assessment documentation relating to the task at hand and ensure that proper controls are implemented before commencing the work.
- Maintain integrity when it comes to hazard assessment documentation. Only sign a JHA or PSI if the content is well understood, and the controls are adequate for the task at hand.
- Report any new hazards or near misses to the supervisor immediately. Also provide feedback on all implemented control measures and processes.

2.3 Assessment Processes

Each worker must secure the knowledge of how to identify and assess hazards in their scope of work. In the event there is no supervisor present a worker may have to conduct a personal risk assessment before implementing proper controls to complete a task safely. Below is the procedure to identify and assess hazards in the workplace for workplace parties. Assessments must be performed again when a significant change to the workplace is introduced.

2.3.1 Hazard Identification

1. Before beginning a task or job-specific task remember **PEMCEP**. People, Equipment, Material, Conditions, Environment, and Process. These are the primary variables of hazard causation. If you are to complete or are observing work, it is crucial you ask yourself several questions that may lead to identification of hazards.
   Ask yourself:
   - Are the ***P****eople* conducting the work properly trained?
   - Is the ***E****quipment* maintained in good condition? Any frays, damages, or malfunctioning parts?
   - Is the ***M****aterial* being worked with safe for worker handling? Is there a Safety Data Sheet?
   - Are the ***C****onditions* right to complete this work? Are there any circumstances that could interfere with conducting the job safely? (i.e. Foot Traffic, Lighting) Is there enough time to complete the task safely?
   - Is the ***E****nvironment* safe to complete the work in? What is the temperature and weather like?
   - Is this the correct ***P****rocess* to get the job done safely? Is there an SJP?

   Asking these questions alone is not enough, most often workers, supervisor, and/or Superintendent will need to critically think and envision possible scenarios stemming from PEMCEP. Once “What could go wrong?” has been answered, one can examine the causes of those scenarios by identifying the hazards. If it poses a danger, causes a danger, or motivates danger, it is a hazard. It may help to write the hazard down and/or discuss with a coworker or supervisor.

It is also wise to examine the hazard category so you may cross reference potential controls with the potential hazards. The hazard categories are: Physical, Biological, Chemical, Musculoskeletal, Psychosocial, and Safety.

2. Once a hazard has been identified, in respect to workplace roles do the following:
    - *Worker* – Check MBC's Health and Safety Program for a SJP/SWP on the task, in the event there is no SJP/SWP, check the site trailer for a completed JHA (f2.2) or PSI (f2.1), if there is no JHA or PSI available, cease work on the task, report the hazard to the supervisor and complete an observed hazard form (f9.4), or wait for a complete JHA or PSI.
    - *Supervisor/Superintendent* – Conduct hazard assessment procedures immediately if there is no SJP, JHA, or PSI for the task at hand.
    - *Management* – Consider creation of an SJP/SWP for the associated task at hand with the observed hazard.

2.3.2 Hazard Analysis Procedure

All personnel are to follow proper hazard analysis procedure as required. Below are the steps required to ensure that all levels of the organization are conducting their due diligence to conduct a hazard analysis and protect worker health and safety.

Once hazard(s) have been identified:

- Management and the Superintendent must ensure that a site-specific hazard assessment is completed, included in the SSSP, orientated, and made available to all workers.
- **If any hazards exist that pose an immediate danger to an employee's life, take immediate action to protect the worker.**
- If there are no control measures in place the work task must cease until management, Superintendent, or the supervisor has completed a JHA, PSI or developed/referenced a SJP.
- On the JHA be sure to list all detailed steps to completion of the task, its purpose is to be a walkthrough for worker safety until a proper SJP is developed. If there is a hazard present that is unique with no available SJP then a new JHA must be created.
- Workers and supervisors are to collaborate the JHA. It is a key time to display knowledge of the workplace and share methods of control to their scope of work.
- When conducting a JHA, the Potential Hazards and Controls Guide can be reviewed to assist in identifying hazards. Any unlisted hazards should be included in the JHA. Reviewing near misses is a good indicator that the existing hazard controls may not be adequate on their own.

- Once you have disclosed the task steps, hazards, and controls associated, use the risk matrix at the top of the JHA form to provide a risk rating (High, Medium, Low, Very Low) using the proper metrics of severity of potential injury x likelihood of an incident. It is important that within likelihood you also consider the frequency of incidents on the project as well as the frequency of the task being conducted.
- Once the hazard analysis has been completed, the JHA must be signed by each crew member conducting the work to display competence and knowledge of its content.
- The form then must be signed by the Superintendent or management so the work can continue once appropriate controls have been implemented.
- If a hazard with a risk rating of low or very low can be corrected easily it should be corrected as soon as possible, do not wait to complete a JHA.
- The Superintendent and management must ensure that all proper hazard assessment documentation is maintained, and accessible to workers at all times for their review.
- Superintendent is to conduct a hazard assessment upon significant changes to the working environment. (f2.3)
- Hazard assessments may require revision or an updated version to accommodate changes in the workplace or incidents. Updates are required for new project phases, the introduction of new hazards on-site, new technology/mechanisms, or new workplace conditions.
- Retain original copy of Hazard Assessments on-site.

MBC Office workers are required to conduct a hazard assessment if they are performing manual labour.

2.3.3 Daily Briefing/Pre-Safety Inspection (PSI)

At the start of each day foremen/supervisors/superintendents are to gather their workers to conduct a PSI (f2.1). The PSI outlines the tasks to be completed throughout the day and a general list of hazards and controls associated. This effectively communicates safety requirements for workers to perform their work safely. Workers must sign or attest to the PSI to document their understanding and competency to complete the task at hand.

The primary difference between a PSI and a JHA is that the PSI examines multiple tasks on a surface level, whereas the JHA is an in-depth assessment of a specific task.

2.3.4 Critical Tasks

Critical tasks are jobs that could result in catastrophic injury. All tasks that involve a risk rating of Very High **before** controls are implemented are considered Critical tasks. Critical tasks must not be performed until:

1. A JHA or SJP has been developed or is already existing, and an emergency plan has been established for the project.

2. The listed controls from the JHA or SJP are implemented and reduce the risk rating to medium (if not possible, to the lowest possible rating).
3. The JHA and/or SJP is understood by all workers involved.
4. All personnel to conduct the work are to sign the JHA to confirm competency and knowledge of how to perform the job in a safe manner.
5. Critical tasks should be reconsidered when inclement weather or poor environmental conditions exist.
6. Always consider legislative requirements and standard work practices when conducting hazard assessments. Take reference to all safety manuals, procedures, and the *Occupational Health and Safety Act* as necessary.

Critical tasks may have varying ratings dependent on the workplace environment or conditions. Remember that a JHA is not required for tasks with a lower risk rating than Very High, however, it is strongly encouraged to engage in a JHA for any task that may pose a serious risk to workers.

Not all tasks are deemed critical. The task is evaluated using the risk rating as influenced by the workplace elements of PEMCEP. Some examples of potentially critical tasks are:

- Working at Heights
- High Voltage Electricity
- Vehicle Operation with High Foot Traffic
- Working with Chemicals
- Concrete Pours
- Working with Inexperienced Workers
- Rigging and Hoisting
- Excavation

MBC conducts all hazard assessment and risk prioritization by the metrics outlined in the MBC Risk Matrix. It is important when rating risk to consider not only the severity, probability, and frequency, but also the public, applicable legislation, and visitors or suppliers.

MBC reserves the right to request any hazard assessment from subcontractors and may direct a subcontractor to complete such documentation if necessary.

2.4 Common Construction Hazards

Below is a list of hazards commonly found on a construction site. This list is to assist in your assessment in identifying hazards in your workplace. Hazards are never limited to a list; all personnel are expected to remain vigilant on site as all hazards might not be thought of when reviewing scopes of work.

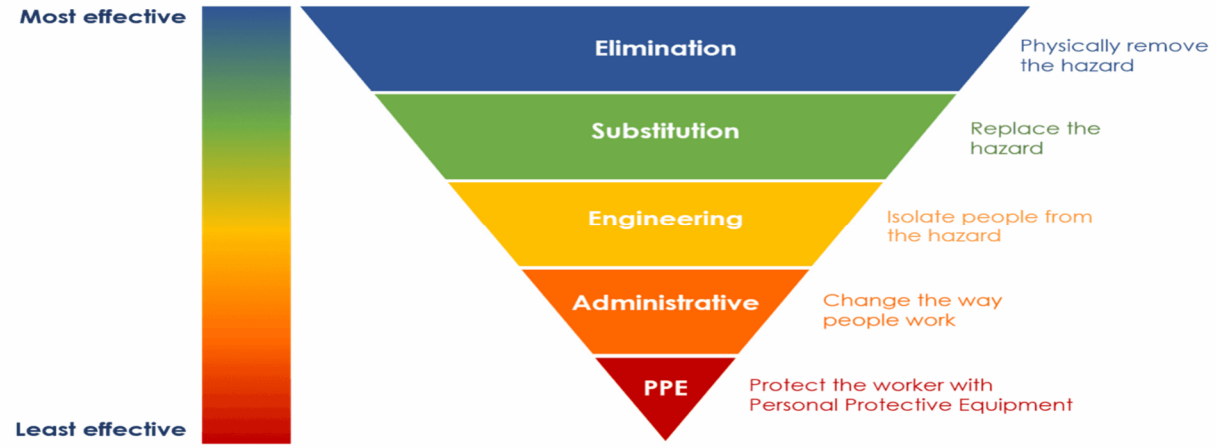
- Falling Objects
- Working At Heights
- Slips/Trips/Falls
- Power Tools
- Vibration
- Noise
- Heavy Lifting
- Overhead Work
- Repetitive Tasks
- Cold/Hot Temperatures
- Asbestos/Mold/Fungi
- Confined Spaces
- Dust Particles
- Impalement
- Electricity
- Vehicle Traffic
- Heavy Equipment
- Harmful Materials
- Rigging/Loading
- Working with Inexperienced Workers
- Ladders
- Missing PPE
- Fire
- Lack of Training
- Debris
- Lack of Documentation
- Excavation
- Shrapnel/Flying Objects
- Dull Blades
- Radiation
- Twisting and Force
- Unguarded Machinery
- Unsafe Access/Egress
- Unstable Barriers/Structures
- Poor Weather Conditions
- Working Alone

2.5 Control Measures

Control measures are the remedial tools in the hazard assessment process. It is the practicality of controls that adequately protects and minimize risk. Identifying which methods best control hazards is required to ensure the risk of a specific task is reduced. This can effectively be done through open communication.

2.5.1 Effectiveness and Hierarchy of Controls

The hierarchy of controls is a guideline for processes and effectiveness of remedial and corrective measures. The hierarchy of controls should be referenced and considered when



conducting JHA, developing SJP, and working job-specific tasks.
The hierarchy of controls is as follows:

Elimination – is the method or process which allows the hazardous variable of the job or task to be completely removed. This is the most effective method to protect workers and removes the root cause of danger from the workplace equation. Elimination should always be the first considered option when considering control measures.

Substitution – is the method or process which allows the hazardous variable of the job or task to be replaced or substituted with another and less hazardous variable. This is the alternative to elimination and is often simple and straightforward to conduct. While it cannot remove a hazard like elimination, it can reduce the likelihood or severity of a task that is inherently risky.

Engineering Control – is the method or process in which specifically designed or engineered work equipment, structures, or isolating barriers are used to prevent workers from being exposed directly to the hazardous variable. Engineering controls isolate workers from the hazard and are physical changes to the workplace and may include items like guardrails, traffic control lanes, and barriers between vehicles. Engineering controls are the most

effective of the three direct implementation methods. (Engineering controls, Administrative Controls, and PPE)

Administrative Control – is the method or process which involves identifying and implementing SWP, policies, or training so workers can perform or critically assess their job duties safely. Often administrative controls reference risk/hazard assessment documentation.

Personal Protective Equipment – is the method or process which is the last resort at controlling hazardous variables. If the hazard cannot be eliminated, substituted, or isolated, the PPE is the worker's last defense. PPE will vary from job to job. It is crucial to consult administrative control measures and hazard assessments before conducting work with PPE as the only control.

2.5.2 Control Selection Process

Within this program MBC intends to give all personnel the tools and knowledge necessary to learn how to control hazards in the work environment with respect to their scope of work. Below is the process for selecting the proper control measures for workplace hazards and completion of a hazard assessment.

1. Before selecting controls consult with the HSR, JHSC or review any available SJP as needed. It is often that SJP's have all the required and adequate control measures stated.
2. Examine hazard assessment forms that involve the same or similar tasks. If there is no hazard assessment available, one must be completed before conducting the work.
3. In detail, assess the task-steps and the hazards, discern the cause of the hazard and the risks or the degree of harm it presents. (i.e. Slip/Trips are often caused by poor housekeeping, and in the event someone trips they could land on loose material or rubble, causing serious injury.)
4. Check the hierarchy of controls. Can this hazard be eliminated or substituted from the workplace without direct implementation? If not, continue.
5. Check to see which of the three direct implementation methods are most suitable to reduce the hazard. In the event the most suitable option is PPE, consult SDS, JHSC, HSR, Health and Safety Coordinator, a supervisor, or the *Occupational Health and Safety Act*.
6. Implement the reasonably practicable controls required to conduct the job safely.

After reviewing hazards and risk reduction strategies, a competent person should select the most feasible, effective, and permanent control option. When selecting controls always prioritize according to the hierarchy of controls. If no single method fully protects workers, consider using a combination of methods. Additionally, avoid implementing controls that may directly or indirectly introduce new hazards if possible.

It is important to note that continual assessment of workplace hazards is needed as each task instance is unique in its environmental, conditional, and material variables, therefore at times rendering certain methods of control insufficient. In this event, the process must once again take place and a more suitable control for the task be implemented. Controls should be readily available on-site at all times.

Controls are often effectively placed:

a) At the source
b) Along the path
c) At the worker

2.5.3 Process Control

Process control involves changing the way a job activity or process is done to reduce the risk. It is not the same as administrative controls as generally this method of control is conducted as an alternative to the hierarchy. Process control is not ideal, but there may be some occasions where it is required. All process controls must be monitored before and after change is implemented to ensure the changes did, in fact, control the hazard. In the event process control is necessary, use a second JHA form and label “Unique Process”. Fill out the JHA as normal but with the new process and steps required to get the job done safely. Staple or attach the Unique Process to the original JHA.

2.6 Common Control Measures

Below is a list of control measures commonly administered in the workplace. It is recommended to reference this list when conducting a hazard assessment. The Potential Hazards and Controls Guide (s2.09) is an extension of the list below. Workers are expected to conduct thorough and proper hazard assessment to identify proper means of control. The purpose of these lists are informative references for common control measures, and not necessarily the most effective pertaining to a unique task or workplace.

- Hard Hat
- Steel-toe Boots
- Reflective Vest
- Safety Glasses
- Gloves
- Earmuffs/Headsets
- Road Barriers
- Fall Prevention Systems
- Lanyard/Fall Arrest Systems
- Rope Grabs
- Lifelines
- Lifting with a Coworker
- Proper Training
- Proper Housekeeping
- Masks
- Lighting
- Proper Inspection
- Reviewing SDS
- Reviewing Installation Documentation
- Proper Work Procedure
- Grounding
- Traffic Cones
- Caution Tape
- Erecting Barriers
- Machine and Tool Guards
- Impalement Covers
- Guardrails
- Floor Hole Covers
- Debris Netting
- Proper Access/Egress
- Vehicle Maintenance
- Good Hygiene

2.7 Control Evaluation

Ongoing review and assessment of controls, hazards, and training is required to ensure that all levels of the organization are conducting their due diligence to the fullest of their abilities regarding hazard assessment. As outlined in S2.03, each task instance has unique environments, conditions, and materials, therefore, the hazard control system must be monitored to ensure that the controls are working effectively and that exposure to hazards is reduced or eliminated. Below are methods to maintain a safe evaluation system of hazard assessments.

2.7.1 Evaluation Tools

Physical Inspection – In some instances control measures may suffer from wear and tear, become deficient, or malfunction. Therefore, a regular physical inspection is important. Ensure that all parts are present, there are no damages, and that the control works or operates as intended. This should be documented by any equipment inspection or PPE inspection forms.

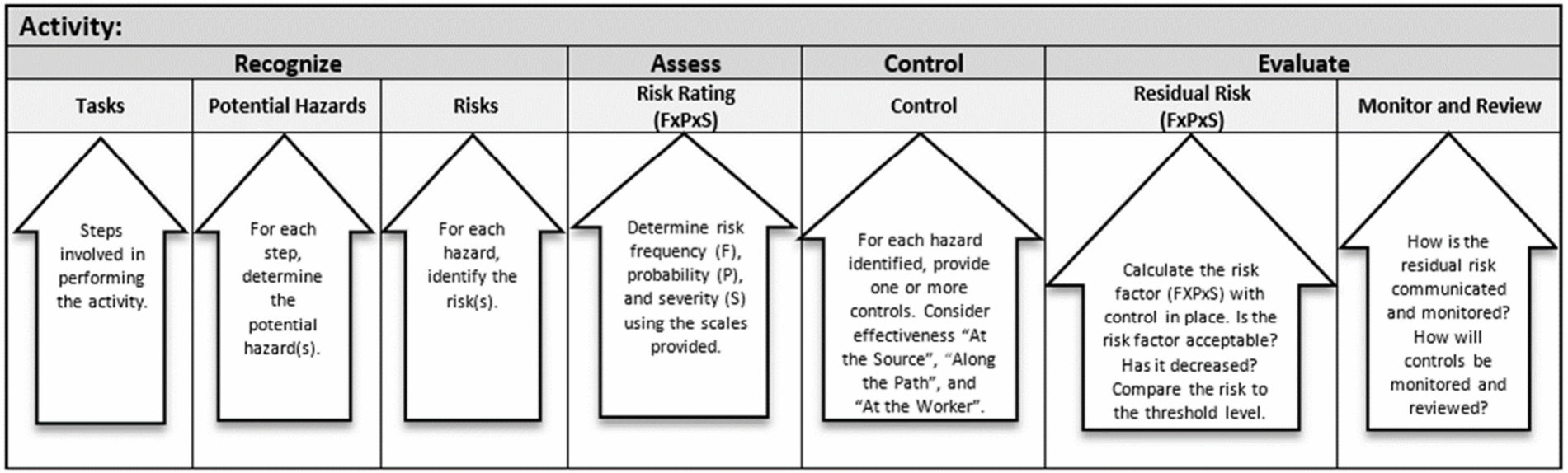
Observation – Watching workers initiate tasks with control measures put in place is an effective evaluation method to see the efficacy of their ability to reduce risk. Some key questions while observing might be:

- Have any new hazards been created?
- Are workers using the new controls properly?
- Is risk posed by the original hazard contained or reduced?
- Is there more that can be done?

Worker Feedback – Talking to the people conducting the work is an effective method of evaluation. The worker is the one utilizing the methods of control and therefore will have more practical insight to the effectiveness of the control system in place. They may note something that was not considered in the assessment and control process.

Incident Reports and Other Documentation – Examining the incident reports of a workplace contributes much to evaluate the hazard assessment and controls of an organization. Conducting trend identification of injuries, non-compliance, and review of SJPs and JHAs may tell you where or what control measure or device is insufficient for preventing specific injuries. They may even indicate that there is a lack of training at the workplace. Near misses are indicators that current controls are not adequate to mitigate risk in the instance.

2.8 Hazard Management Guideline



2.9 Risk Matrix Chart

Risk Matrix Chart							
RISK (Likelihood X Severity)	Remote	Unlikely	Occasional	Likely	Very Likely	**RISK RATING**	
Insignificant	Low 1	Low 2	Low 3	Low 4	Low 5	**Low**	Almost or little to no risk but still existent
Minor	Low 2	Low 4	Medium 6	Medium 8	Medium 10	**Medium**	Risk has potential for harm, reduce if possible
Moderate	Low 3	Medium 6	Medium 9	High 12	High 15	**High**	CAUTION – Additional controls needed
Significant	Low 4	Medium 8	High 12	High 16	Very High 20	**Very High**	DANGER – Implement controls Immediately
Very Significant	Low 5	Medium 10	High 15	Very High 20	Very High 25	**ALL factors should be considered when calculating risk (Frequency, Worker Experience, Environment)**	

Potential Hazards and Controls Guide

Purpose

The purpose of this guide is to encompass various hazards and controls in which the industry is most prone to in one centralized document to ensure the connection between hazard category, hazard, and various working control methods. Workers will identify the hazard in the workplace using this list and reference all available and listed controls to use in their PSI's, hazard analysis, and other documents.

Maintenance and Review

The Potential Hazard and Controls Guide will be maintained and reviewed at minimum once a year following suit with the release of each year's editions of the health and safety program. This document will be identified in the Management Review.

Guide Table is on the next page

Potential Hazards and Controls Guide

Hazard Agents and Examples

Physical Agents	Biological Agents	Chemical Agents	Ergonomic Agents	Psychosocial Agents	Safety Hazards
Extreme Temperature	Allergy	Fire	Awkward Posture	Work-related Stress	Slip/Trip
Noise	Insect/Sting	Corrosive/Chemical Burn	Repetitive Motion	Violence/Harassment	Cut/Laceration
Vibration	Animal	Poison/Toxic	Manual/Awkward Lifting	Fatigue	Puncture/Impalement
Radiation	Bacteria	Monoxide	Overhead Work	Deadline Pressure	Fall
Air Quality	Virus	Spill	Twisting/Bending	Working Alone	Flying Particle
Electricity	Mold/Fungi	Explosion	Overexertion (Force)	Alcohol/Drug Use	Overhead/Falling Object
Atmospheric Pressure	Air Contamination	Irritation	Overexertion (Reach)	Remote/Isolated Work	Obstructed Pathway
Dust/Particulate Matter		Inhalation	Stationary Position	Mental Stress	Strike/Crush
		Absorption	Push/Pull	Work-Life Balance	Lighting/Visibility
					Young/Inexp. Worker

Potential Control Measures

PPE	Fall Protection/Prevention	Electrical Protection	Fire Protection	Proper Equipment	Inspections
• Head Protection	• Harness/Lanyard Inspection	• Lockout/Tagout Procedure	• Fire Extinguishers	• Ladders – Inspected	• Circle-check
• Protective Footwear	• Guardrail System	• Grounding	• Fire Watch	• Scaffolding	• Pre-use
• Eye Protection	• Floor Covers	• GFCI	• Non-Spark Tools	• Hand/Power Tools	• Engineering
• Respiratory Protection	• Adequate Anchor Points	• Cord Inspection/Double Insulated	• Grounding	• EWP	• Load
• Reflective Clothing	• Warning Signs/Bump Line	• Buddy System	• Evacuation Plan	• Skid Steer/Forklift	• Safety/Audit
• Hearing Protection	• Rescue Plan/Work Plan		• Fire Resistant Clothing	• Rigging Equipment	• Work Area/PSI
• Skin Protection	• Ladder Tie-Off				

First Aid	Training	Temperature Mitigation	Barrier Systems	Process Controls	Vehicle/Traffic
• First Aid Kits	• Competency	• Work/Rest Schedule	• Basic Locking Mechanism	• Wet Method	• Traffic Control Plan
• Eye Wash Stations	• Equipment Training	• Liquids Available	• Concrete Barrier	• Equipment Use	• Barricades/Jersey Barriers
• Emergency Alarm System	• Site Orientation	• Warm Areas	• Gate/Fence	• Workstation Alteration	• Signs (Speed/Awareness)
• Emergency Phone Numbers	• Safety Certification	• Monitoring	• Machine Guard	• Change Temperature	• Reflective Clothing
• Hospital Route	• Toolbox Talks	• Adding/Removing Layers	• Wooden Barrier	• Tool Attachment	• Emergency Route
			• Temporary Wall		

Testing and Monitoring	Welding/Cutting	Excavation/Trenching	Demolition	Hygiene	Hazardous Substances
• CO Detectors	• UV Protecting Glasses	• Sloping/Shoring	• Pre-demo Survey	• Clean Facilities	• Workplace/Supplier Label
• Detector Tubes	• Flame Resistant Clothing	• Trench Boxes	• Structural Condition	• Hand Soap/Disinfectant	• Proper Storage
• Water Samples	• Cylinders Secured	• Utility Locates	• Isolate Work Area	• Potable Water	• SDS Consultation
• Noise Survey	• Face Shield	• Barricades/Guardrails	• DSR Consultation	• Adequate Space	• Training in Proper Use
• O2 Tester	• Flashback Arrestors	• Daily Inspection	• Proper Schedule/Process	• Masks Available	• Spill Control/Plan

3 Company Rules

3.1 Company Rules Policy

McDonald Brothers Construction Inc. is committed to maintaining a structured and disciplined internal responsibility system and ensuring that all employees are treated indiscriminately. The goal is to provide a safe, healthy, and fair workplace for all workers, Supervisors, Subcontractors, and visitors.

This section of the Health and Safety Program outlines the roles and responsibilities within the internal responsibility system as well as management's commitment to enforcing company rules and progressive disciplinary action. All workplaces will be subject to company rules as well as specific project rules. All company rules will be available at every workplace within the company and easily accessible.

Company Rules are always in place to guide and protect people in the workplace.

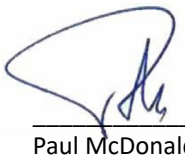
Below are some of our company's rules:

1. Horseplay, violence, and harassment are prohibited.
2. Drugs and alcohol are prohibited unless a worker has a prescription from a licensed physician.
3. Theft, vandalism, and abuse of property are prohibited.
4. Work areas must be properly maintained and kept tidy.
5. All required safety training must be current and valid.
6. Personal protective equipment must be worn, and workers trained to use as required.
7. No phone use while in operation of any vehicle or equipment.
8. All hazard controls must be used as intended.
9. All incidents and/or near misses are to be promptly reported and documented.
10. All are to follow and abide by MBC's Health and Safety Program

3.2 Workplace Violence and Harassment Policy

McDonald Brothers Construction Inc. is committed to the prevention of violence and promotes a violence-free workplace. Any act of violence committed by or against any member of our workplace, clients, contractors, suppliers, or member of the public, is unacceptable conduct that will not be tolerated. This policy applies to all activities that occur while on MBC premises or while engaging in MBC business, activities, or social events. Violence or abuse in any form erodes the mutual trust and confidence that are essential to MBC's operational effectiveness and will result in disciplinary action.

See section 3.01 of the MBC Health and Safety Program for detailed responsibilities.



_____ _____April 2, 2024_____

Paul McDonald — Date

President

3.2.1 RESPONSIBILITIES

Management

- Ensure all Workers are aware of the Workplace Violence and Harassment Policy.
- Provide and implement measures that minimize workers risk to workplace violence and harassment which may include developing specific workplace arrangements.
- Ensure every reported incident is thoroughly investigated and reviewed, and appropriate action taken and followed up with.
- Assess and review this policy annually.
- Direct corrective actions or controls regarding workplace violence and harassment.

Superintendent/Supervisor/Foreman

- Conduct hazard assessment regarding workplace violence and harassment.
- Assess risks for each work area or project as required.
- Be equipped to reach emergency assistance.
- Assist in workplace violence and harassment related investigations.
- Respect a worker's complaints or concerns regarding workplace violence and harassment.
- Implement all corrective actions or controls as directed or required.
- Include workplace violence and harassment in safety meetings and toolbox talks.

Workers/Suppliers/Visitors

- Comply with MBC's Workplace Violence and Harassment Policy.
- Follow all measures that are put in place to protect people from workplace violence.
- Contact a Supervisor, Superintendent, or management regarding any observation or awareness of ongoing workplace violence and harassment.
- Complete an observed hazard form (f9.4) after reporting workplace violence and harassment.
- Do not be in possession of any weapons while at work or use an object to threaten another worker.
- Assist with investigations relating to workplace violence and harassment.

JHSC and Safety Representative

- Ensure a violence/harassment hazard assessment has been created and reviewed as required.
- Put forth to management recommendations for activities and methods for addressing workplace violence and harassment hazards.
- Report on the evaluation of the workplace standards and measures taken to reduce workplace violence and harassment.

3.2.2 Definitions of Workplace Violence

a) The exercise of physical force against a worker within the workplace that causes or could cause physical injury.
b) An attempt to exercise physical force against a worker within the workplace that could cause physical injury.
c) A statement or behavior that is reasonable for one to interpret as a threat to exercise physical force against a worker within the workplace that could cause physical injury.

Some examples include:

i. Threatening behavior such as shaking fists, destroying property, or throwing objects.
ii. Verbal or written threats that express an intent to inflict harm.
iii. Physical altercations or attacks.

Any other act that would create fear in a reasonable person

3.2.3 Definitions of Workplace Harassment

a) Engaging in a course of vexatious comments or conduct against a worker that is known or ought reasonably to be known as unwelcome.
b) Engaging in a course of vexatious comments or conduct against a worker because of sex, sexual orientation, gender identity, or gender expression, race, religion, and where the course of comments or conduct is known or ought reasonably to be known as unwelcome.
c) Making a sexual solicitation or advance where the person making it is able to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Some examples include:

i. Verbal misconduct such as derogatory jokes or comments, slurs, or any unwanted sexual advances.
ii. Visual misconduct such as the posting, display or messaging or derogatory and/or sexually oriented posters, pictures, photography, illustrations, or gestures.
iii. Threats and demands to submit to various acts or activities not associated with one's regular duties and responsibilities of employment.
iv. Ethnic or racial slurs, jokes, and other verbal or physical conduct, whether verbal or written, relating to a person's race, religion, color, age, sex, ethnicity, disability, or any other protected basis under applicable federal, provincial, and local law

3.2.4 Reporting/Responding Procedures

1. Any observed workplace violence and harassment is to be reported as soon as possible. These incidents are to be reported to the Superintendent, supervisor, or management. Complete an Observed Hazard Form (f9.4) if possible.
2. Any person receiving a report of workplace violence and harassment must report the situation to management.
3. Management will conduct a thorough investigation in a timely manner.
4. All reports of workplace violence and harassment are to be kept confidential except as necessary to protect workers, as well as be documented in writing.
5. Offender will be subject to disciplinary action as deemed by management.

Any employee who is a victim of or witness to an act of physical violence or harassment shall take all reasonable steps to remove themselves from the threat of violence. This may include but is not limited to, work refusal, calling Management, or calling 911.

An employee who is the victim of an act of harassment or violence, physical or nonphysical, should, where reasonably possible, let their objections to the behavior be known to the alleged offender, directly or with the assistance of management.

If an employee remains uncomfortable with their situation after having made the offender aware of their objection to their behavior, the employee should report the situation to management. The employee should make written and detailed notes of the incident(s), including the nature of the behavior, dates, times, witnesses and provide a copy of these notes to management.

Any violation of this policy is grounds for disciplinary action or dismissal

3.2.5 Worker's Rights Regarding Workplace Violence and Harassment

1. All workers have the right under section 43 of *Occupational Health and Safety Act* (OHSA) to refuse work with a person or situation they believe poses a threat to their health and safety. A worker who acts maliciously in their work refusal may be subject to disciplinary action.
2. Should the worker choose to contact an outside source to launch a complaint/investigation they may contact the Ministry of Labour, Training and Skills Development (MOL) who will investigate and provide a documented report, including recommendations for improvement/changes.

3. All work refusals will be investigated internally, and the MOL notified if the situation is not resolved.

3.2.6 Assessment Procedures

1. Management and Superintendents are to create a site-specific hazard assessment including the risks of workplace violence and harassment which is to be included in the Site-Specific Safety Plan or remain available within site-specific documentation.
2. All known potential sources of workplace violence or harassment should be identified in the hazard assessment. This includes any employees personal work history and relationships with other workers, or other sources. (For privacy, names will be excluded from assessment.)
3. All employees will be notified of the workplace violence and harassment policy via the annual safety meetings, site orientations or official company documents.
4. The assessment must identify controls that can eliminate or reduce potential for workplace violence and harassment. This may include:
    a. Communication methods
    b. Adjusting assigned workplace and or task
    c. Notification to supervisors, superintendents, management of worker interrelations

The assessment process will be reviewed on an annual basis or as required by management

3.3 Drugs and Alcohol

While working for MBC, it is strictly forbidden to use or be under the influence of alcohol, illegal or recreational drugs. Misuse of prescription drugs is also prohibited. MBC recognizes that working while impaired poses a danger to not only the impaired worker but their coworkers. Any worker suspected of being impaired will not be permitted to continue work. If the employee is deemed unfit for work, the employee will be provided safe transit home.

Substance Abuse Control

Substance abuse control applies to all MBC employees including Subcontractors' employees. MBC will not allow the following behavior by any worker:

i. Use or consumption of any form of alcohol, recreational or illegal substance at a workplace at any time.
ii. Sale, purchase, transfer, offering, use or possession of alcohol, recreational or illegal substances and/or prescriptions at MBC workplaces.
iii. A worker will not arrive or be at work while under the influence of alcohol, or any recreational or illegal substance.
iv. Any violation is grounds for disciplinary action and or dismissal.

Medicinal marijuana and other prescribed medications may impair an individual's ability to safely perform a task. Any individual that has been prescribed such medications must provide the Superintendent and/or management a valid medical document supporting the use of the substance for medical purposes. The health care practitioner's prescription must identify that the individual's scope of work has been fully disclosed and approved for use while performing their tasks.

Workers under medical prescriptions which impact the worker's ability will be set to restricted work if available:

- The worker will not be permitted to work at heights.
- The worker will not be permitted to operate any equipment or vehicle nor work around such equipment or vehicle.
- The worker may be reassigned to a position that does not pose a risk to themselves or others if such a position is available.
- Further restrictions will be determined on a case-by-case basis by the Supervisor, Superintendent or Health and Safety Representative.

Addiction and Support

MBC recognizes substance abuse and addiction is an illness and offers support to workers. Workers that report to MBC their addiction and seek help will be given the necessary resources and information so the worker may obtain treatment. Workers may be placed on medical leave until their treatment is completed, and the substance is no longer relied upon by the worker.

Addiction Research Foundation, 303-150 Isabella St. Ottawa, 613-569-6024
Ontario Drug & Alcohol Registry of Treatment, 1-800-565-8603 (Confidential and Anonymous)
Alcoholics Anonymous Ottawa, 613-237-6000, info@ottawaaa.org
Narcotics Anonymous Ottawa, 1-888-811-3887, www.ottawana.org

3.4 Return to Work

McDonald Brothers Construction Inc. is committed through a formal rehabilitation program to support our employees who have been injured in the workplace. MBC will make every reasonable effort to provide suitable employment to any employee unable to perform their duties because of a work-related injury or occupational illness. While the directive of MBC's Health and Safety Program is to create a safe working environment that reduces or prevents the likelihood of injury there will always be a possibility of worker injury. MBC is committed to re-integrate all injured employees and to cooperate, comply, and communicate with the Workplace Safety and Insurance Board (WSIB).

3.4.1 RESPONSIBILITIES

Management

- Provide a fair and consistent rehabilitation policy for injured or ill workers on or off the job.
- Provide a meaningful employment and modified duty for injured, ill, or disabled workers.
- Allocate all necessary resources to ensure proper implementation of this policy.
- Assist in modification of the workplace to accommodate injured workers.
- Oversee and review the management of injury cases and Return to Work (RTW) processes.
- Communicate with the Superintendent on a proper RTW Plan (f3.1).
- Ensure all relevant paperwork is being completed, processed, and filed accordingly.
- Monitor worker progress towards returning to their former duties.

- Monitor compliance with the RTW program, review its effectiveness and consult or receive feedback from Superintendents, Supervisors, and workers on potential improvements.
- Act as liaison with the employee's treating agency and WSIB where required.

Superintendent/Supervisor/Foreman

- To advise and notify employees of the RTW program and provide required forms.
- Take part in drafting the RTW Plan (f3.1).
- Communicate with management to properly manage the RTW program.
- Communicate with the worker to ensure medical appointments are being attended, compliance with the RTW Plan (f3.1), and that the duties are suitable for the worker.
- Monitor/Report on worker progress.
- Schedule bi-weekly meetings with the worker to discuss their progress to pre-injury duties.

Injured Worker

- Report injury as soon as possible and maintain communication throughout recovery.
- Obtain Form 8 from a medical professional showing initial treatment and send to management.
- Communicate concerns and problems to Supervisor.
- Ensure to attend all scheduled rehabilitation appointments and activities.
- Work in compliance with the RTW Plan (f3.1).
- Collaborate with MBC to develop an efficient and safe RTW Plan (f3.1).

Wages and RTW Objective

The RTW program is a means of accommodating an employee's temporary or permanent work restrictions. It is designed primarily to assist injured employees to make a safe and speedy return to their regular duties. It is usually a temporary measure that is to bridge the gap between injury and return to regular duties.

RTW is any task or function or combination thereof that an employee may safely perform without risk to themselves or others. The work must be of value and productive, and not interfere with the normal operation of the department. An employee under the modified work program, either temporary or permanent, will continue to receive their regular wages from the company.

3.4.2 RTW Procedure

1. Where an employee has a work-related injury requiring medical attention, the first aider will administer first aid and notify management of the injury.
2. Injured worker is to obtain a Form 8 from the treating physician and send to management as soon as possible.
3. If dire medical care is required then it is preferred that the worker be accompanied to a medical facility with a supervisor, Superintendent, or HSR.
4. Employer must submit a completed Form 7 or Incident Report to WSIB within 3 days if the injury required more than first aid treatment.
5. Management and Superintendent will review the Form 8 and determine if written medical restrictions (if any) can be accommodated within the employee's regular duties. If not, reasonable effort to accommodate work restrictions will be taken within the department, or in another if necessary. An RTW Plan will be drafted using all recommended accommodations as appropriate.
6. The Superintendent must discuss the drafted RTW Plan with the worker. Once the plan is agreed upon the worker may sign off and the form be returned to management.
7. All Supervisors that oversee the modified work are to be notified in writing of the workers modified work duties and functional abilities. No Supervisor will ask an injured worker on RTW to perform a task that exceeds the limitations of their injury as dictated by the RTW Plan.
8. If an RTW Plan could not be agreed upon the program manager will contact the WSIB and discuss available RTW. The company reserves the right to arrange a second medical assessment by a physician of the company's choice.

9. The worker is to begin the RTW Plan. The Superintendent will monitor the worker's progress to their pre-injury duties over the necessary timeline and meet with them to discuss as required. If the worker is unable to work during this time, Superintendent will contact them as needed.
10. At the end of each week the RTW Plan will be reviewed with new objectives for the coming work week. This should be done in consultation or presence of the worker.
11. Once the worker demonstrates ability and capability of resuming pre-injury duties, clearance must be obtained by a treating physician via a functional abilities form, doctors note, the WSIB or the expiry of work limitation documents.

3.5 Work Refusal

As dictated by OHSA, workers have the right to refuse work where they have reasoned the work could be unsafe and they or their coworkers could be potentially injured by a condition of the workplace, the equipment being used, the processes they are to follow, or by workplace violence. Workers are to refuse work responsibly; any malicious intent or abuse of the work refusal system may be grounds for disciplinary action.

OHSA Definition on Work Refusal

A worker may refuse to work or do particular work where they have reason to believe that:

a) Any equipment, machine, device, or thing the worker is to use or operate is likely to endanger themselves, or another worker.
b) The physical condition of the workplace or the part thereof in which they are required to work, or workplace violence is likely to endanger them.
c) Any equipment, machine, device, or thing they are to use or operate or the physical condition of the workplace or the part thereof in which they work or is to work is in contravention of this Act or the regulations and such contravention is likely to endanger themselves, or another worker.
d) Upon refusing to work, the worker shall promptly report the circumstances of the refusal to their employer or Supervisor who shall investigate the report in the presence of the worker and, if available, in the presence of a committee member who represents workers if any, or a Health and Safety Representative.

MOL Investigation

An inspector shall investigate the refusal to work in consultation with the employer or a person representing the employer, the worker, and if there is such, the person mentioned above.

- The inspector shall, following the investigation referred to, decide whether the machine, device, thing or the workplace or part thereof is likely to endanger the worker or another person. The inspector shall give their decision, in writing, as soon as is practicable, to all parties involved.

Pending the investigation and decision of the inspector, the worker shall remain in a safe area during the worker's normal working hours unless the employer:

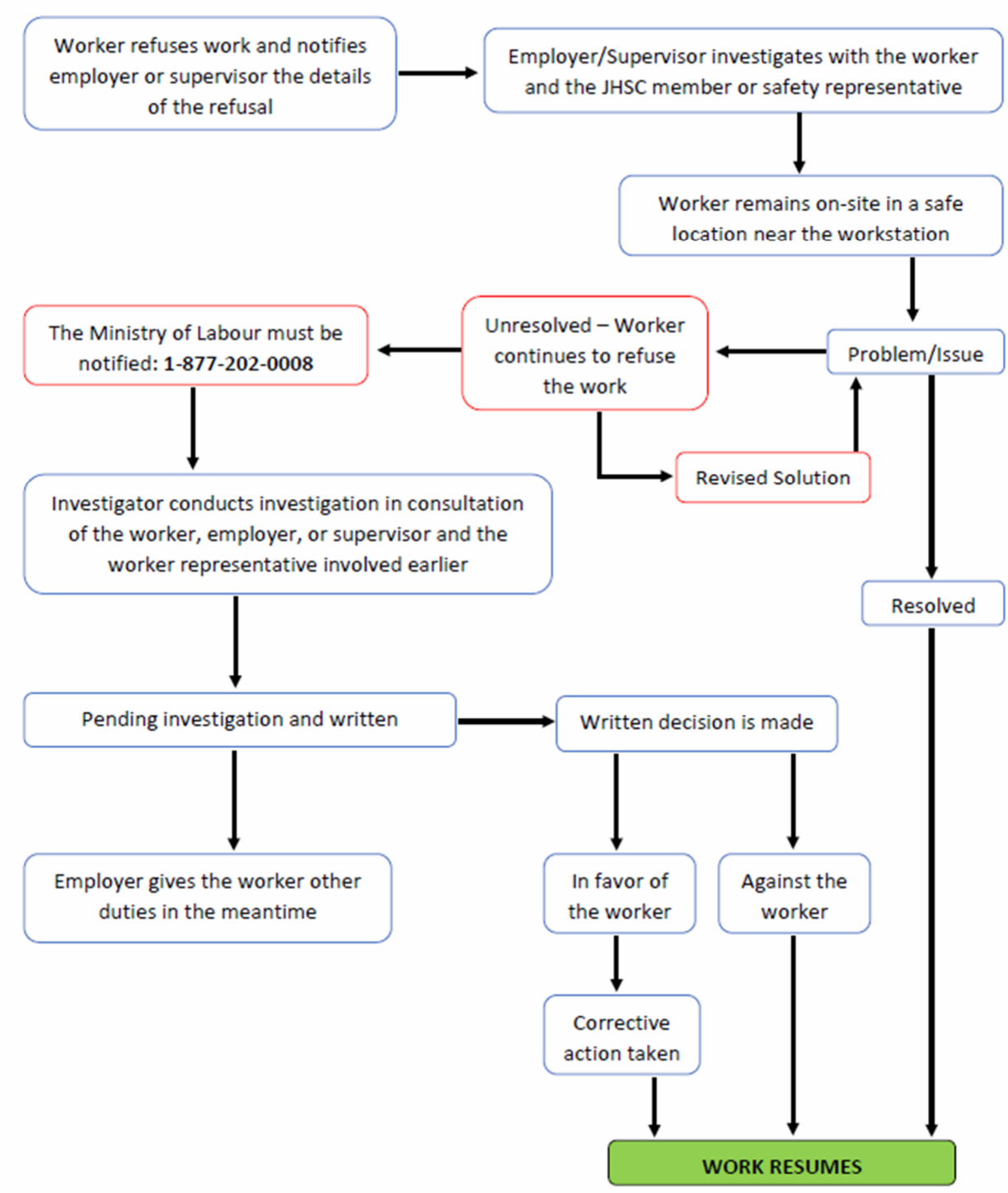
a) Assigns the worker reasonable alternative work during such time; or
b) Where an assignment of reasonable alternative work is not practicable, gives other directions to the worker.

Pending the investigation and decision of the inspector, no worker shall be assigned to use or operate the equipment, machine, device, or thing or to work in the workplace or in the part of the workplace being investigated.

3.5.1 Work Refusal Procedure

1. The worker shall communicate the circumstances of the Work Refusal immediately to their Supervisor and complete the work refusal form (f3.2).
2. The supervisor shall stop the work that is related to the worker's concern until an investigation can take place under direction of the Superintendent.
3. The supervisor shall notify the Superintendent and Project Manager overseeing the project. The Superintendent will conduct the refusal investigation using the refusal investigation form (f3.3). The Superintendent may call the Health and Safety Coordinator or safety consultant for assistance, as necessary.
4. The worker will remain in a safe area of work and be available to participate in the investigation.
5. The Superintendent will investigate the worker's concerns as soon as possible in the presence of the worker and health and safety representative.
6. If the complaint of the worker can be easily remedied at the time of the investigation, the Superintendent and safety representative shall take steps to correct any perceived problems, in the event the situation is remedied, work may resume. If more corrective action is required, work will not resume until all reasonable corrections have been taken.
7. If the worker's concern is not remedied, they may once again refuse the work.
8. The second refusal will be sent directly to management which shall further investigate the refusal and take additional steps as necessary to address the worker's concerns.
9. All work refusals are to be documented using the work refusal form (f3.2) and refusal investigation form (f3.3).
10. In the event no remedy can be made to the work which is being refused, the MOL may be called and shall conduct their own investigation.
11. The MOL shall give the worker and company a decision in writing as how to proceed.

3.6 Work Refusal Flowchart



3.7 Subcontractor Management

McDonald Brothers Construction Inc. recognizes the importance of properly integrating subcontractors into the Health and Safety Program and providing proper training, direction, and organization. MBC firmly believes that health and safety is a shared responsibility among all in the workplace. This section shall outline the subcontractor's requirements as it pertains to MBC workplaces regarding health and safety.

3.7.1 Subcontractor Requirements

MBC requires all subcontractors to conduct work to the same standard of health and safety expected from MBC employees. Subcontractors shall review and abide by the MBC's Health and Safety Program and relevant legislation. Once a contract is engaged, Subcontractors are required to:

- Provide a Form 1000 to the Project Manager/Coordinator.
- Read and sign the MBC Health and Safety Program (or Orientation Booklet).
- Provide a copy of the Subcontractor's own program and policies if available.
- Provide all relevant Safety Data Sheets (SDS) for their scope of work.
- Provide a hazard assessment process, and a site-specific hazard assessment as required.
- Additional contractual stipulations are further clarified in MBC's Subcontract or CCA-1.

General rules and guidelines for MBC's subcontractors and their subcontractors at MBC workplaces:

- All subcontractor tools, equipment, and machinery are to be inspected, maintained, and operated as required by the manufacturer, MBC safe work practices, or legislative requirements.
- Must immediately notify MBC of any accident, incident, or near miss that occurs on the day of the event and for high-risk hazards and injuries must conduct an accident/incident investigation to be reported and sent to MBC within 24 hours.
- Must attend MBC's project safety orientation.
- Must ensure that MBC is made aware of all individuals on site performing work at any given time, whether the individual is a direct employ or its subcontractors of any tier.
- Must have workers re-trained upon expiry of any certificates. Failure to provide or demonstrate documentation/verification of training and competency may result in the removal of the worker, supervisor, or subcontractor from the workplace.
- Must disclose the language status of the provided work crew. In the event none of the crew speak English, a translator must be provided by the subcontractor.
- Must conduct hazard assessments when required, in an appropriate timeline.

- All workers are to have valid training in the minimum:
    a. Working at Heights (if applicable to scope of work)
    b. MOL Health and Safety Awareness
    c. WHMIS as dictated by the OHSA.

Subcontractors and workers from Quebec are required to obtain this training as the work is within Ontario. There are <u>NO EXCEPTIONS</u> to the required mandatory training.

3.7.2 Meetings and On-site Interactions

Subcontractors are expected to have interaction on site with MBC employees and other subcontractors. MBC is committed to promoting a team environment where the responsibility of health and safety is shared by all. This includes health promotion, communication and direction as needed.

While MBC has toolbox talks and safety meetings, subcontractors are required to conduct their own. This must be done on a weekly basis minimum. If possible, all toolbox talks and safety meetings should reference current hazard assessments and procedures.

Subcontractors may also be subject to taking part in the Joint Health and Safety Committee or Trades Committee. This allows subcontractors to play a key role in the safety management system on-site.

All subcontractors are to attend monthly safety/coordination meetings. The meeting frequency is determined mostly by size of the project, duration of work and the scope of work. Meetings may outline the scheduled plans for work, new hazards introduced to the workplace, hazard assessments and controls, and any new site developments. It is key for subcontractors to attend these meetings as they are an open communication channel between MBC and subcontractors to describe any changes to the workplace.

3.7.3 Approved Subcontractors

MBC selects subcontractors based on many factors and variables. As projects are completed some subcontractors may be added to MBC's list of approved Subcontractors. Approved subcontractors may be recommended and/or contacted for new work projects based on multiple factors.

Designation of approved Subcontractor is partly determined by:

- Cooperation with MBC's Health and Safety Program and work schedules.
- Health and safety record while working at MBC's workplaces.
- Proactive hazard assessment processes and policies.
- Training records and updates to worker certifications.
- Work productivity, efficiency, and workplace attitude.
- Administrative efficiency regarding change management and shop drawings.
- Housekeeping and tidiness.

3.7.4 Delivery Personnel

Delivery Personnel are not required to provide a subcontractor health and safety policy or contract. They shall not perform any services, other than delivery while at the workplace. They are to abide by MBC's Health and Safety Program and wear the appropriate PPE. All efforts should be put forth by the project team to organize and schedule deliveries to mitigate congestion on site. An orientation is not required.

3.7.5 Visitors

Visitors are not required to provide a subcontractor health and safety policy or contract. They shall not perform any services, other than conducting the purpose of their visit. They are to abide by MBC's Health and Safety Program and wear the appropriate PPE. A short duration orientation shall be conducted and expires within the week. The Site-Specific Safety Plan (SSSP) is to be reviewed.

3.8 Disciplinary Action

MBC is committed to enforcing disciplinary action as required. All workers in violation of company rules are subject to disciplinary action and workplace safety measures. In addition, MBC has a progressive disciplinary policy which all employees and subcontractors are subject to.

Disciplinary action can be carried out by:

- Management
- Superintendents
- Supervisors/Foremen

- Health and Safety Coordinator
- Health and Safety Representatives
- Joint-Health and Safety Committee

Management

- Management will exercise disciplinary action as deemed necessary.
- May enact disciplinary action through observation during site visits or by review of disciplinary record/observed hazard record.
- Depending on the severity, may terminate employment.
- May remove the worker from the workplace and/or all other MBC workplaces until a responsive action is determined.
- May rescind a disciplinary report upon review.

Superintendent/Health and Safety Coordinator

- Superintendents and the Health and Safety Coordinator may exercise any disciplinary action as deemed necessary except termination of employment.
- In the event a worker commits an unsafe act and is therefore an observed hazard, both an observed hazard form (f9.4) and a disciplinary action form (f3.5) are to be completed. (The observed hazard form referenced in the disciplinary action).
- For a repeating offender, reference all relevant disciplinary reports and observed hazard forms of the worker from within the duration of the project.

Health and Safety Representatives/Joint Health and Safety Committees

- Health and Safety Representatives (HSR) and Joint Health and Safety Committees (JHSC) may exercise verbal warnings and written warnings but may not issue suspensions.
- In the event a worker committed an unsafe act and was therefore an observed hazard, both an observed hazard form (f9.4) and a disciplinary action form (f3.5) are to be completed.
- All observed hazard forms are to be referenced or attached to the disciplinary action form (f3.5).
- For a repeating offender reference all relevant disciplinary reports and observed hazard forms of the worker from within the duration of the project.

Supervisors

- Supervisors may exercise verbal and written warnings as disciplinary action for any worker under their Supervision.

- Notify the Superintendent of each report.
- Once the worker has exceeded the written warning, take all disciplinary responsibilities to the Superintendent or if a worker is acting in an unsafe manner report to the JHSC or HSR.

The observed hazard form is not a disciplinary form but may include disciplinary actions taken to correct the safety issue caused by a specific worker. All observed hazard forms resulting in disciplinary action must have a corresponding disciplinary action form, both pages should reference each other by incident and date.

If a worker feels disciplinary action is unwarranted, they may contact Management for a proper evaluation of the disciplinary report and corrective/disciplinary actions taken.

Progressive Disciplinary Procedure

Any worker (including subcontractors) not utilizing proper safety judgement or conduct, or is in violation of the OHSA or MBC's Health and Safety Program will receive:

1. First, a verbal warning for the worker's behavior, actions, or processes.
2. If a worker violates policy a second time, the worker will receive a written warning and may be subject to a three-day suspension.
3. If a third report is made of the same worker, that worker is subject to a more serious suspension of up to two weeks or a permanent removal from the workplace.
4. If a worker has continual disciplinary reports of a serious nature, Management may exercise the right to terminate a worker if their disciplinary record is deemed a recurring hazard that endangers the safety of other workers after a proper review and assessment.
5. Subcontractors shall replace any of their workers removed from the project due to safety reasons as to not delay any portion of the project.
6. Any worker caught willfully damaging property or committing theft will be permanently removed from all MBC workplaces.
7. A worker may be subject to a meeting with Management to discuss their actions, behaviors, or processes. Disciplinary action is then dictated by Management.
8. If an offence is serious in nature, the employee may be removed immediately upon approval from upper management.

4 Joint Health and Safety Committee and Health and Safety Representatives

4.1 Worker Representation Policy

McDonald Brothers Construction Inc. recognizes that workers will have fair and elected representation when it comes to matters regarding the selection of worker health and safety representation. Health and Safety Representatives and Joint Health and Safety Committees promote a safe work environment and participation of workers in the ongoing management of hazards in the workplace. Joint Health and Safety Committees will include members of both management and the workers.

MBC is committed to providing a healthy and safe work environment and cooperating when resolving issues with the aid of worker representation. Worker representatives and worker participation are crucial to the internal responsibility system of MBC's Health and Safety Program.

4.2 Pre-Requisites and Legislative Requirements

4.2.1 Worker Representation Thresholds

Number of Workers	Legislative Requirement
1 to 5	The workplace is not required to have an HSR. A JHSC is required if Asbestos Containing Materials impact the scope of work being performed for a sustained period.
6 to 19	The workplace is required to have an HSR. A JHSC is required if Asbestos Containing Materials impact the scope of work being performed for a sustained period.
20 to 49	The workplace is required to have a JHSC. The committee must have at least 2 members. (1 from MBC management, 1 from the workers)
50 plus	The JHSC must have at least 4 members (2 from MBC management, 2 from the workers) and 2 must be Certified Members. A Construction Project is required to form a Worker Trade Committee.

4.2.2 JHSC Meetings

Committee members are required to meet at the Workplace at least once every 3 months. MBC aims to hold committee meetings once a month if possible. The committees must be co-chaired by two members, one management representative and one worker representative, and must be documented.

Meeting dates should be established on a set schedule or at the conclusion of each committee meeting unless deemed an emergency. This date should be recorded in the minutes of the meeting. A copy of the minutes should be distributed to members. Minutes should be signed by the co-chairs and posted in the workplace within one week of the meeting.

4.3 Worker Trades Committees (WTC)

When a Construction Project exceeds 50 Workers, a WTC must be formed. The WTC must represent workers employed in each of the trades at the project. These members must be selected by workers employed in the trades they represent. The WTC's primary responsibility is to inform the JHSC of any health and safety concerns that workers employed in the trades may be exposed to.

4.4 Certification and Training

JHSC Certified Members are required when the workplace exceeds 50 Workers. The *Occupational Health and Safety Act* requires one member representing workers and one member representing management to be certified. To become certified, a person must complete the JHSC Certification and Workplace Specific Hazard Training Parts 1 and 2. Refresher training is required every three years.

Part One, Basic Certification provides an overall knowledge of health and safety that applies to all workplaces and teaches one to navigate safety legislation.

Part Two, Workplace Specific Hazard Training focuses on significant hazards in the workplace. It covers the Recognize, Assess, Control, Evaluate (RACE) model and how to conduct a proper risk/hazard assessment.

HSRs are to receive training to enable them to effectively exercise their knowledge and perform their duties. They are to complete one of three possible training courses: the IHSA's HSR eLearning course, the JHSC Part 1 course, or in-house training if available. HSRs may be required to undergo additional Construction Project specific training as needed.

4.5 Inspections/Investigations

The JHSC or HSR is to organize a workplace inspection at least once a month. The inspection must be completed a by a worker member who was selected by the other committee members.

Worker members of the committee may designate one or more worker members to investigate incidents in which a worker is fatally or critically injured. The designated member(s) have the right to inspect the place where the incident occurred as well as any relevant machine, device, or thing, but must not disturb the scene (move, place, or touch items) pending a Ministry of Labour, Training and Skills Development investigation.

Following the investigation, all findings must be reported to the committee and management. Where appropriate, the committee may wish to make specific recommendations to the employer in respect of the hazard which led to the injury or fatality.

4.6 Posting Requirements

All JHSC meeting dates, times, minutes, recommendations, locations, and member names must be posted in a conspicuous place within the Workplace. Ideally, on a Construction Project this information would be posted on the safety board.

4.7 Election/Membership Process

Members of the committee are to be elected by their peers. At least half of the committee must be worker members.

Workers shall select/elect a worker who can oversee the health and safety of all personnel on-site. Management shall select/elect a worker that exercises managerial duties. This includes the site Superintendent(s), Project Manager(s), Health and Safety Coordinator, or any other management role.

Management will maintain a list of all trained and certified MBC employees who are capable co-chairs of a joint-health and safety committee.

4.8 Elections

When creating a joint health and safety committee or choosing a health and safety representative the workplace should be asked which workers would like to volunteer for a position as health and safety representative or a joint health and safety committee member.

- If there are enough volunteers to fill vacancies, they will join the committee.
- If there are more volunteers than there are vacancies, hold an election and allow workers to elect the workers to fill the role.
- If there are not enough volunteers, allow workers to nominate other workers, who may accept or decline a nomination. In cases where there is a lack of volunteers, be sure workers understand the benefits and purpose of JHSC participation.

Elections can be conducted one of three ways.

- By written process.
- By hand vote.
- Amongst the workers. Workers will convene by themselves and select/elect whichever volunteer they deem the most safety aware and capable to fill the role.

Results of elections are to be finalized by sending a report to management.

4.9 Duties and Responsibilities of Representation

The HSR and JHSC have various duties including:

- Identifying actual and potential hazards in the Workplace.
- Obtaining information from the employer relating to health and safety in the workplace.
- Inspecting the workplace on a regular basis.
- Being consulted about and having a member representing workers be present at the beginning of any health and safety-related testing in the workplace.
- Recommending health and safety improvements in the workplace.
- Voice concerns against workers refusing to comply with legislation or not meeting policy requirements. If deemed sufficient by the Superintendent, could lead to disciplinary action.

All committee members should be available to receive worker concerns, complaints, and recommendations; to discuss issues and recommend solutions; and to provide input into existing and proposed workplace health and safety programs.

4.9.1 Information Inquiries

The HSR and JHSC have the right to obtain information from the employer regarding health and safety in the workplace. They may request information such as:

- Identification of potential or existing hazards involving materials, processes, or equipment.
- Copies of site-specific orders or reports issued to the employer by the Ministry of Labour.
- Results of any assessment pertaining to hazards or workplace violence.
- Training records.

4.9.2 Investigative Duties

The HSR and JHSC have certain duties pertaining to inspections and investigations whether in-house or by the Ministry of Labour. In the event of a Ministry of Labour investigation, the Health and Safety Representative or joint-health and safety committee members may accompany the inspector and participate in the investigation. They may also accompany any in-house investigation or inspection, as well as conduct their own workplace inspections.

4.10Recommendations

The HSR and JHSC can make formal or informal recommendations to management about health and safety issues arising in the workplace. These recommendations or observations are strongly encouraged as it is within the policy of MBC to have all workers participate and promote a healthy and safe working environment. Recommendations can be filed via the HSR/JHSC Recommendation form (f4.1).

The employer is to respond to safety recommendations within 21 calendar days, in writing, containing a timetable/schedule for implementing recommendations or reasons why they disagree with any recommendations.

4.10.1 PROCEDURE

1. In the event the JHSC or HSR notice a hazard or recurring hazard that exceeds the practicable capability of personnel on-site to correct, they may file a recommendation of corrective action to the employer. This includes implementation of standard hazard controls, procedures, and processes.

2. The notable hazard/concern should be discussed with the rest of the committee before choosing to write a formal recommendation to select the most agreed upon corrective action.
3. Complete the JHSC/HSR section of the Safety Recommendation form (f4.1) with signatures from both the worker co-chair and manager co-chair committee members. Ensure the form is sent directly to a corresponding member of management.
4. In the event there is no joint-health and safety committee, the health and safety representative may file recommendations as needed.
5. Management has 21 calendar days to complete the “Response” section of the form and issue it back to the joint health and safety committee. Included in the response should be a schedule and direction of how and when controls should be implemented. In the event the hazard is not controllable, or management refuses the recommendations of the JHSC, a justified reason must be stated.
6. Once the form has been received back from management, the JHSC may review the status of the recommendation and decide if a health and safety professional (in-house or third-party) should be consulted. If not, the process of recommendation is closed, and control implementation can begin. If any dispute is to be taken, the JHSC is to complete the Additional Notes section of the safety recommendation form and sent to management a final time. It should be specified which health and safety professional should be consulted; management will then arrange a time for such a professional to consult.
7. All recommendation documents must be maintained and kept in accessibility of the JHSC or HSR. Documents must be stored for a minimum time equal to the duration of the project.

5 Personal Protective Equipment

5.1 Personal Protective Equipment Policy

McDonald Brothers Construction Inc. acknowledges that not all engineering or administrative controls completely remove hazards. Despite being the last resort of protection (control at the worker) on construction projects, personal protective equipment (PPE) can be of vital importance. Many hazards that exist on construction projects require the use of PPE to limit exposure. In most cases, PPE is to be used as a backup system to controls that limit exposure at the source or path rather than at the worker.

MBC is committed to ensure that consideration is given to engineering and administrative controls, as well as the use of proper PPE on each project. Furthermore, project personnel will ensure that all controls, including PPE, are properly used and maintained. To ensure that workers are protected from hazards where possible, it is policy that all personnel on an MBC project wear the appropriate PPE required by construction regulations and company policy.

Workers must ensure they select the appropriate PPE for their exposure/needs and conduct pre-use inspections. PPE must be used as required by the manufacturer and workers must replace any defective component or device immediately upon discovery. Workers will be trained on the inspection, selection, use and limitations of all their PPE.

PPE use is generally required and dictated by several items, including:

- Site Specific Hazard Assessments
- Safe Work Practices (SWP)
- Safe Job Procedures (SJP)
- Legislative Requirements
- MBC Health and Safety Policy

Personal Protective Equipment policies and procedures will be drafted as needed for tasks that require their use. After approval and examination by MBC management, a new SJP, SWP, or subsection of Section 5 – Personal Protective Equipment will be developed and integrated into the MBC Health and Safety Program. It is mandatory for workers to wear PPE as directed by the MBC Health and Safety Program and legislation.

PPE Inspections and use will be tracked and reviewed by management; changes may be made to policy based on conclusions of these inspections, trend identification, and worker feedback

5.2 Roles and Responsibilities

There are specific responsibilities when it comes to provision of personal protective equipment. MBC acknowledges the responsibility of issuing proper PPE to personnel and encourages all workers use PPE as trained and instructed by manufacturer standards.

5.2.1 Management

1. Establish PPE use ensuring legislative requirements are met.
2. Allocate necessary resources required to ensure that PPE is provided to workers. (Some PPE is workers responsibility such as safety boots)
3. Ensure supplies/PPE are replenished as required.
4. Ensure PPE maintenance, and purchases are documented and maintained.
5. Develop SJP's/SWP's that include the use of PPE.
6. Ensure all PPE identified in hazard assessments are provided and workers trained in their use.
7. Monitor compliance with all PPE policies and protocols.

5.2.2 Superintendent/Supervisor/Foreman

1. Conduct daily Pre-Safety Inspections (f2.1) that identify hazards, controls, and PPE associated with the work.
2. Ensure PPE is appropriate for the tasks required at the project.
3. Ensure hazard assessments are reviewed by workers.
4. Direct workers to always wear/use appropriate PPE.
5. Enforce the wearing of mandatory PPE by all personnel.
6. Carry out disciplinary action for non-compliance as needed.
7. Ensure PPE is stored and maintained properly.
8. Review PPE compliance issues and requirements in safety meetings with all workers.
9. Assist workers in the proper selection, inspection, care, and use of all PPE.
10. Remove damaged PPE from service and replace as necessary.

5.2.3 Worker

- Wear/use all PPE required by the Act, regulations, and MBC.
- Verify that PPE being used is CSA approved and appropriate for the scope of work.
- Participate in PPE training as directed by MBC.
- Review and acknowledge the site-specific hazard assessments and be aware and informed on all hazards and potential hazards on a project.

- Adhere to all training provided and ensure all controls as deemed by hazard analysis or SJP/SWP are in place before conducting work.
- Inspect all PPE before use, do not use any PPE that is damaged or defective.
- In the event PPE is damaged or defective, decommission the device/equipment and bring to the attention of the superintendent to be replaced.
- Advise and notify the supervisor of hazards or non-compliance of PPE requirements.

Never remove, make ineffective, or modify any protective device required by regulation or MBC

5.3 Common PPE and Requirements

There are many common types of personal protective equipment placed on job sites. While working for MBC, noted below are the most common circumstances you will encounter. Read through the details and requirements, develop an understanding as to how this PPE functions and what is required to use them. There are 3 mandatory PPEs to enter an MBC project.

All PPE selection should be dictated by Safe Job Procedures, hazard analysis, or site-specific hazard assessments. Always consult with the Superintendent, Supervisor, HSR, or JHSC if you are unsure the task you are doing requires specific PPE. If needed, review the manufacturer manual.

5.3.1 Safety Footwear (Mandatory)

MBC requires at a minimum to be worn at all times while on a construction site

- Grade 1 CSA approved footwear displaying the “green triangle” patch.

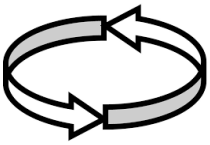
- Laces must be tied to avoid tripping hazards.
- Footwear must not be modified in any way.
- Damaged or defective boots must be immediately taken out of service and replaced. (Includes rips, tears, holes, frays, worn out soles, etc…)
- While not in the finishing phase of a project, footwear must provide full ankle protection.

5.3.2 Hard Hat (Mandatory)

REQUIRED AT ALL TIMES WHILE ON A CONSTRUCTION PROJECT

- As per the *Occupational Health and Safety Act*, on construction projects, safety headwear must be a Type 1 Class E Hard Hat (Has a shell which can withstand a dielectric strength test at 20,000 volts phase to ground).

- Must be worn facing forward unless it has a reverse orientation mark as shown below:



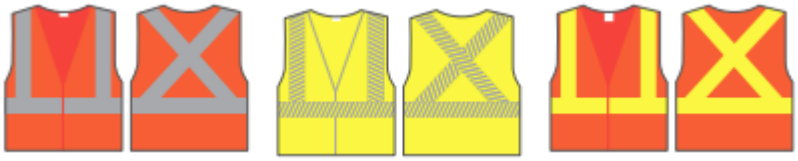
- Must be adjusted to fit securely around the head.
- Must be free of any paint or solvent.
- Damaged or defective hard hats must be immediately taken out of service and replaced.
- After an impact or severe blow, the hard hat is to be taken out of service and replaced.

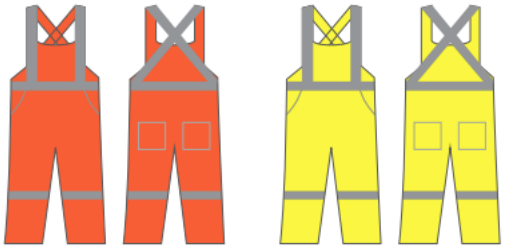
5.3.3 Hi-Visibility Garment

MUST BE WORN ON A CONSTRUCTION PROJECT WHILE CIVIL OPERATIONS ARE IN PROGRESS OR PERSONNEL ARE WORKING IN PROXIMITY/EXPOSED TO ANY VEHICULAR TRAFFIC.

- Must comply with CSA Z96:22 Class 2 or Class 3.
- Public road way work after sunset will additional consideration.
- Must be fluorescent yellow, orange, red, or bright yellow, orange.
- Must be the “top” layer of clothing.
- If a vest - be adjustable for proper fitting.
- If made of nylon vest must be “Tear Away”.

Examples of Class 2 Apparel





Examples of Class 3 Apparel

5.3.4 Gloves

If the task being performed presents a risk of injury to the workers hands or fingers, protective gloves should be worn.

- MBC workers and subcontractors are encouraged to wear gloves when handling sharp/jagged edged materials or objects or when a vibration hazard cannot be removed or controlled.
- Gloves should be a good fit for the user.
- Gloves should be inspected before each use to identify any defects.

5.3.5 Hearing Protection

When it is not possible to avoid exposure to a noise hazard, hearing protection in the form of PPE will need to be worn.

- Noise exceeding a volume level of 85 dBA may cause damage to the ear, and therefore when working in an excessively noisy area, hearing protection is required.
- To quantify the levels workers will be/are exposed to, noise measurements will be taken upon management request for the tasks being performed or a project noise survey.
- Should any worker have a concern regarding a specific work area or task which may have excessive noise (both acute and chronic); a noise survey will be conducted.
- Workers may request earplugs or headsets from MBC for excessively noisy operations in which the noise may not be reduced or removed.
- Must be inspected before use to ensure they are in proper condition.
- To be effective, hearing protecting devices must not be removed even for short periods.
- Head phones or ear buds for music and phones are not considered hearing protection
- CSA hearing protection devices are defined by Class A, B or C. Class A being the highest level of protection, C being the lowest. See table below.

5.3.5.1 SAMPLE NOISE TABLE BASED ON 8 HOURS OF EXPOSURE

Typical Noise Levels for Construction Equipment		CSA Protection Level
Loaders/Cranes	77-84	None required
General site conditions	<84	
Compressors	85	Class C < 90db
Backhoes	85	
Dozers	86	
Compactors	90	Class B > 90db up to and including 95db
Trenchers	95	
Concrete saw	97	Class A >95db up to and including 105db
Scrapers	97	
Chainsaws	100	
Jackhammers	100	
Grinders	106	>105db Dual protection (min class A Earplug and class B Ear muff)
Sand blasting nozzle	111	
Pile drivers	119	

5.3.6 Eye Protection

When working a task that is prone to producing flying shrapnel, abrasive compounds, dust particles, or pose a risk of damaging one's eye, eye protection must be used.

- Eye protection is to be dictated by the hazards associated with the specific task and identified in Job Hazard Analysis, PSIs, and Site-Specific Hazard Assessments.
- Must fit correctly and properly.
- Must be kept clean and free of vision-impairing scratches.
- Damaged or defective eyewear is to be taken out of service and replaced.
- It is recommended to wear a full-face shield while operating a tool that uses abrasive, carbide, or diamond blades.
- Subcontractors will make suitable eye protection available to their employees.
- Safety glasses, goggles, and face shields may be used.

5.3.7 Appropriate Clothing

There are mandatory clothing requirements when working on an MBC site.

- All clothing must be sturdy and snug-fitting while allowing freedom of movement.
- Must not be torn, ripped, or cut.
- Neck chains and jewelry that can get tangled or snagged by equipment should be considered.

- Pants must be full length and worn waist high – No shorts are permitted on MBC projects.
- Top must be minimum coverage of a t-shirt for protection.
- Long hair is to be tied for visibility and to avoid any pinch hazards.

5.3.8 Fall Protection

When a worker may be exposed to a fall greater than 2.4m / 8 feet that cannot be controlled any other way, the worker must use personal fall protection equipment. This will typically include an approved harness and lanyard.

- Be familiar with and follow manufacturer instructions.
- Only use a harness that is sized and adjusted to fit properly.
- Should always be properly stored and placed away from direct sunlight.
- Must be inspected before each use, if damaged or defective it is to be immediately removed from service and replaced.
- Must be tied off to a fixed support (structural) or a lifeline connected to a fixed support.
- A rescue procedure for suspended workers following an activated fall protection device can be found in the Site-Specific Safety Plan (SSSP) or S.10 – Fall Rescue Plan
- Worker should be aware of the manufacturing date. (This can be found on the tag of the device)

5.3.9 Respiratory Protection

If a worker could be harmed by breathing airborne contaminants or particles, respiratory protection should be worn.

- Common airborne hazards include but are not limited to:
    - Gases such as carbon monoxide
    - Vapours released by solvents
    - Fumes from welding activities
    - Mists from spray-painting
    - Dust from grinding or chipping
- Wherever possible, remove or reduce the hazard at the source.
- Respirator cartridges will be selected for use based on the hazard associated with the task.
- For Silica it must be noted that a surgical or cloth mask is not adequate respiratory protection. An N95 at minimum should be used.
- Workers should follow manufacturer instructions on use, care, and storage of respiratory equipment.

- Tight fitting respirators (half mask, full mask, and SCBA respirators) must be fit tested prior to use. Workers must be clean shaven when wearing such a respirator.
- All respirators must be inspected before each use. Damaged or defective respirators are to be taken out of service and replaced immediately. Make sure to also examine the cartridge in use.

5.4 PPE Inspection and Replacement Procedures

McDonald Brothers Construction Inc. requires workers to inspect their PPE before each use. PPE inspections are to be conducted either formally or informally. Formal inspections require documentation through the PPE Inspection portion of a PSI via Worker signature and verbal confirmation. Informal inspection includes worker visual inspection of their PPE prior to use. All equipment that is deemed unfit for service will be removed from the workplace and disposed of.

MBC personnel are subject to pre-use inspections of all PPE. The following Inspection Procedure outlines the how to perform the inspection.

5.4.1 Inspection Procedure

1. Workers are to conduct an inspection of their PPE prior to each use.
2. This inspection is to be thorough, examine all parts of the device or equipment. Any frays, cracks, rips/tears, fading, or any other damage to a device warrants a fail in the inspection.
3. If performing a PSI, record any findings through the pass, fail, or N/A options on the PSI form.
4. Once the form is completed, sign and save the form. If defects were found or any equipment is not serviceable, and the selected PPE has failed the inspection, continue to step 6.
5. Tag-out and remove the identified defective PPE from service.

If a replacement is required immediately ask the Superintendent, if there is no more available PPE to be distributed, the Superintendent will put in a purchase request to management. Give the tagged-out equipment to the Superintendent.

6 Preventative Maintenance.

6.1 Maintenance Policy

McDonald Brothers Construction Inc. understands that proper preventative maintenance and inspection of powered machines, vehicles, and tools contribute to the reduction of risk, injury, damage, and lost production. MBC is committed to ensuring a safe work environment. All preventative maintenance will be properly documented, and all records filed and maintained.

The term “Equipment” captures the essence of all categories for powered machines, company vehicles, powder actuated tools, etc.

It is imperative to consult and refer to equipment operation manuals and recommendations for each piece of equipment being used while complying with the *Occupational Health and Safety Act* and all legislative requirements.

Preventative maintenance procedures will be drafted as new equipment is added to inventory after approval from management. Procedures will review operation manuals and drafted procedures will be integrated into MBC’s Health and Safety Program. MBC advises workers that are not trained in maintenance must not conduct maintenance on any MBC equipment.

Recommendations from annual or regular reviews will be documented and submitted to management. Management will then follow-up on the recommendation and corrective action on a pre-determined timeframe (determined on a case-by-case basis) to ensure such corrective actions have been implemented. All quantitative measurements will be taken with properly maintained and calibrated equipment.

Circle-checks are to be conducted regularly, at minimum once per shift, unless superseded by the manufacture’s operation manual. Workers conducting a circle-check should be thorough as possible. Workers should never operate equipment with missing or lacking parts, if parts are found missing or defective the worker is to ensure they tag-out the equipment until repairs are completed.

All equipment, machinery and vehicles are to have a Safe Job Procedure, Safe Work Practice, and/or a manufacture’s operation manual available.

6.2 Roles and Responsibilities

All levels of the organization have roles within preventative maintenance procedures. Below is a list of preventative maintenance roles and responsibilities within MBC.

Management

- Ensure a proper preventative maintenance policy and procedure is implemented.
- Ensure a safe work practice, safe job procedure, or manufacturer manual is provided with equipment.
- Monitor, review, and evaluate the preventative maintenance policy annually.
- Monitor compliance with procedure and consult with the Shop Technician for improvements to procedure and policy.
- Provide known information of hazards, PPE, and training, relevant to operation of any machine.

Shop Technician

- Implement and practice maintenance procedures on equipment they are qualified for. If they are not qualified for working on a specific machine, then the maintenance will be outsourced.
- Properly train any designated workers allowed to conduct repairs or maintenance.
- Conduct repairs and/or annual maintenance on equipment as needed.
- Must document and log all company required forms. Repair and maintenance history is to be maintained until equipment is removed from inventory.
- Communicate and engage with management for improvements to the preventative maintenance procedures.
- Manage and track the equipment master inventory list.

Superintendent

- Promote and enforce compliance of preventative maintenance procedures to workers.
- Ensure competent workers are completing required circle checks and documentation.
- Complete maintenance requests and send to the Shop Technician.
- Ensure equipment circle checks are made available physically or through SiteDocs.
- Notify Shop Technician of any failed inspection of equipment as soon as possible.

Worker/Supervisor/Foreman

- Comply with MBC's preventative maintenance policy and procedures as well as all relevant legislation and the *Occupational Health and Safety Act*.
- Conduct circle checks as needed (f6.1-6.3).

- Conduct pre-use inspection of equipment and ensure that all required guards are equipped.
- Request repairs as necessary for malfunctioning or defective equipment.
- Advise supervisor or Superintendent of hazards or non-compliance regarding any equipment.
- Comply with all Shop Technician orders and instructions for maintenance.

Grease the equipment according to the recommended hours found in the manufacturer manual

6.3 Inspection Procedures

6.3.1 Powered Machine and Vehicle Circle-Checks

1. Workers are to conduct inspections of all MBC powered machines and vehicles at the beginning of each work shift they will see use.
2. Workers will not start or operate any powered machine until an inspection has been completed.
3. Retrieve inspection log and complete step-by-step inspection checklist.
4. If any item fails inspection, notify the Superintendent immediately.
5. Once complete, return the inspection log.
6. If an item that is considered major fails the inspection, tag-out the machine/vehicle, take the keys and inspection log and bring to the Superintendent. Notify them of the issue so they may place a maintenance request or receive instructions from the Shop Technician.

6.3.2 Pre-Use Tool Inspections

1. Workers are to conduct a pre-use inspection of all tools.
2. Inspection is to be informal, no forms required.
3. If available, consult the manufacturer manual for any pre-use inspection directives and procedures.
4. Check the tool for any damages, cracks, malfunctioning or dysfunctional parts, frays, or anything that is not intended by manufacturer standards.
5. Ensure all required tool guards are in place.
6. If the tool has a defect, notify and report to the foreman, supervisor, or Superintendent.
7. Shop Technician will give direction and procedure on how to proceed.

6.3.3 Powered Machine and Vehicle Inspection Timelines

Powered machines and vehicles generally undergo two unique types of inspection, annual and structural. These inspections are to be conducted or coordinated by the Shop Technician or management. Timelines for expiring inspections are tracked by SiteDocs. Below is an inspection timeline for each piece of equipment:

6.3.3.1 Powered Equipment

- All equipment greater than 10hp will be inspected annually.
- Annual inspections are to be performed by the Shop Technician or an approved service technician.

6.3.3.2 Mobil Elevated Work Platforms (MEWP)

- All MEWPs will be inspected annually by a qualified service technician.
- The annual inspection will be verified by a sticker attached to the elevating work platform near the operator's station; and shall include, the date of the last maintenance and inspection, the signature and name of the person who performed the maintenance and inspection, and an indication that the maintenance has been carried out in accordance with the manufacturer's recommendations.
- Any equipment capable of elevating personnel is subjected to a mandatory 10-year structural inspection from the equipment manufacture date, or if used equipment is acquired. After 10 years from the manufacture date, the mandatory structural inspections are increased to every 5 years.

6.3.3.3 Trailers

  - Trailer inspections are outsourced.
  - Generally inspected in December each year by manufacturer.

6.3.3.4 Company Vehicles

- Company Vehicles that bear a commercial license are to be inspected annually.
- Inspections are to be performed by a qualified automotive technician.
- Inspection dates vary, contact the Shop Technician for more information if necessary.

6.3.4 For Subcontractors Using MBC Equipment and Machines

Subcontractors using MBC Equipment are to conduct a circle check:

- After 8 hours of use
- After a change in operator or start of the work shift
- As per the manufacturer manual

Subcontractors may use their own circle-check forms or may use MBC's circle-check forms. All copies should be retained for the duration of the project at minimum. MBC retains the right to

request copies of these circle checks for verification of compliance with our Health and Safety Program.

6.4 Inventory Control and Maintenance

6.4.1 Maintenance and Distribution

The Shop Technician will conduct all repairs on equipment if able. The Shop Technician will remind Superintendents as necessary if a piece of equipment is due for a scheduled inspection or maintenance.
The maintenance schedule is designed so that maintenance is performed in accordance with manufacturer's written instruction and any applicable legislation. All maintenance will be recorded in service logs which will be documented and kept in the company records.

All equipment which has undergone maintenance will not be distributed to a workplace without their verification of maintenance. The Shop Technician will verify if the manufactures operator manual is available in hardcopy or verify that it is available within SiteDocs.

In the Field
Workers in the field are to conduct minor and baseline maintenance. This generally includes greasing all moving parts at minimum after 8 hours of run-time, observing fluid levels, tire pressure, fueling up equipment, and more. Consult with the supervisor for further information. Run-time can be found on the hour meter.
Company Vehicles
Designated employees may be assigned a vehicle. The designated employee is expected to properly maintain the vehicles cleanliness and quality and will not damage the vehicle to the best of their ability.

These vehicles receive seasonal maintenance. Designated employees are restricted from performing repairs on company vehicles. Only the Shop Technician or qualified repair shop are to perform repairs. These repairs will be documented in the service logs.

Refrain from allowing new MBC employees or subcontractors access to the vehicle as it is to be operated by designated personnel only. If needed, please seek approval from management. Anyone 25 years old or younger, are not allowed to operate a company vehicle on public roads. Towing with company vehicles is to be limited to work related activities only, unless otherwise approved by management.

7 Training and Communication.

7.1 Training and Communication Policy

McDonald Brothers Construction Inc. (MBC) is committed to ensuring that all workers are adequately trained in health and safety to minimize the potential for harm. All levels of our organization must be involved in health and safety training and communications. MBC shall track, maintain records, and schedule training as required. Different levels of responsibility, literacy, language skills, overall ability, and likelihood of exposure to hazards and risks will be considered while scheduling workers for training.

MBC's mandatory training for employees consists of:

- Workplace Hazardous Materials Information System (WHMIS) 2015
- Ministry of Labour, Training and Skills Development (MOL) Health and Safety Awareness
- Working at Heights where required
- Company Orientation for new MBC employees
- Site Specific Orientation

MBC firmly believes that communication between management, supervisors and workers is key to creating a positive health and safety culture. MBC encourages workers to voice any health and safety concerns or suggestions. These concerns and suggestions will be addressed using an approach that involves all workplace parties where possible. Training and communication policies will be drafted as needed. After approval by MBC management, drafted policies will be implemented into the MBC Health and Safety Program on a regular basis.

MBC communicates safety related correspondence and updates through the following forum(s):

- Toolbox Talks
- Trade Safety/Coordination Meetings
- Joint Health and Safety Committee Meetings
- Site Visits/Safety Surveys
- Safety Audits
- Training Sessions
- Semi-Annual Safety Meetings
- Email Distributions
- Quarterly Newsletter

Workers are encouraged to regularly participate and contribute to these communication sessions to positively impact and develop the health and safety culture within the workplace.

7.2 Roles and Responsibilities

McDonald Brothers Construction Inc. believes a structured training and communications management system is key to maintaining proper training and knowledge on site. Each level of the organization plays a part in training and communications and therefore participation is encouraged from all groups.

Management

- Establish and implement a training management system.
- Provide workers with access to proper training.
- Evaluate training certifications of workers and conduct training needs analysis as necessary.
- Maintain records of all training for active employees. Records must be maintained for a minimum of 6 months after an employee leaves the company.
- Regularly review training legislation and this policy to ensure standards are captured.
- Provide workers with a company standardized health and safety orientation.
- Ensure that Trade Meetings and Toolbox Talks are being performed in the workplace.
- Monitor compliance with training policies and requirements.
- Notify subcontractors of the translator requirement if a dispatched work crew is non-english.

Superintendent

- Ensure all safety meetings are discussing relevant safety issues on site.
- Ensure all paperwork regarding Trade meetings and Toolbox Talks are completed (f7.2, f7.1).
- Ensure all workers and visitors have completed site specific orientation.
- Conduct monthly trade meetings for sites exceeding 50 Workers.
- Report to management if a worker or subcontractor is not complying with training requirements.
- Issue disciplinary action for workers or subcontractors refusing to provide proof of training.
- Provide feedback and suggestions to management to improve the training policy.
- Conduct site-specific safety orientations to all personnel including visitors. This responsibility may be delegated to a qualified JHSC member or the Health and Safety Representative (HSR).
- Review and modify site-specific orientations throughout duration and changes to the workplace.

Supervisor/Foreman

- Conduct weekly Toolbox Talks for crew at minimum.
- Ensure all workers have completed required orientations and received training.
- Make recommendations to improve orientation as appropriate.
- Comply with all training regulations, requirements, and company standards.
- Provide feedback and suggestions to Superintendent and management for improvements towards training policy.

Worker

- Participate in safety meetings and Toolbox Talks as required.
- Complete all required orientations.
- Comply with all training regulations, requirements, and company standards.
- Provide feedback and suggestions to supervisor for improvements towards training policy.
- Sign and complete all required documentation regarding training procedures.
- Meet minimum standard of training pertaining to scope of work and company standards

7.3 Training Requirements

MBC requires their employees and all workers, visitors, supervisors, Superintendent, subcontractors to have mandatory minimum training to enter a project site as dictated by the *Occupational Health and Safety Act* and MBC Policy which are as follows:

- Occupational Health and Safety (OHS) Awareness in 4 (or 5) steps
- Workplace Hazardous Materials Information System (WHMIS) 2015

The Training Validity Reference Guide (Appendix C) provides a quick reference for MOL and MBC requirements and expiry timeframes.

7.3.1 Occupational Health and Safety (OHS) Awareness Training

Health and Safety Awareness Training is provided by the MOL. This training provides a basic understanding of the *Occupational Health and Safety Act*. It is not a replacement for any sector specific, hazard specific, or competency specific training. This training generally outlines the basics for understanding health and safety in the workplace and how to identify and contextualize hazards.

- Training does not expire
- Can be taken online via the MOL website.
- Workers must take OHS Awareness in 4 steps.
- Supervisors must take OHS Awareness in 5 steps.

7.3.2 Workplace Hazardous Materials Information System (WHMIS) 2015

WHMIS training is provided by many accredited safety organizations or by MBC approved personnel. WHMIS training provides an understanding and procedure of handling hazardous products, it identifies where and how to find information regarding these products and which safety controls must be put in place to prevent short or long-term injury to the handler.

- Training does not expire, but refresher training may be issued as required by MBC.
- Certificate should be available in the event of requiring proof of training.

7.3.3 Working at Heights (WAH)

WAH must be acquired before a worker is exposed to heights. This training is required if workers will be exposed to a fall over 2.4 meters / 8 feet with an unprotected edge or operating certain equipment. WAH provides an understanding of rights and responsibilities, warning methods and physical barriers, identifying hazards of working at heights, ladder safety, rescue planning, fall PPE, and more.

- Training expires after three years, approaching expiry the worker is required to take a refresher course which extends validation of certificate for another three years.
- To be eligible for refresher training, Worker must have completed both WAH modules.
- Training certificate copy must be provided to MBC after completion. (MBC workers)
- Certificate should be available in the event of requirement proof of training.
- Previously known as fall arrest or fall protection training.

7.3.4 Company Orientation (VIDEO)

Company Orientation is designed for Employees to develop an understanding of MBC's health and safety culture. This training explains the company Health and Safety Program, information, procedures, and MBC's occupational health and safety management system. There is a long and short version of this video. The long version is for new MBC hires, short version is for new subcontractors.

- Training does not expire, however upon employer or employee request, may take it again.

7.3.5 Site-Specific Orientation

Site Specific Orientation (f7.3) training is provided to workers to develop an understanding of a projects specific and unique health and safety procedures, processes, and environment. Once complete, workers will sign to verify they have completed the Site-Specific Orientation.

- Training provided upon introduction to a new project is required once per site at minimum.

7.3.6 Site Specific Orientation – Short Duration

For visitors, suppliers, or contractors who will only be on the project for a maximum of 2 days. Regarding delivery persons, if the delivery location is outside of the site perimeter a short duration orientation is not required. The Superintendent will determine if an individual requires a short duration orientation based on a number of factors including location, task, and ongoing project activities.

7.3.7 First Aid Training

- At least one worker at the workplace is required to have a valid first aid certificate.
- This training provides emergency response procedures involving injuries to workers.
- All first aid certifications are valid for 3 years before a refresher course revalidates the certification another 3 years. At the end of this second 3-year period you must be recertified.
- Proof of training is to be always made available.

7.3.8 Propane

- Required for workers who handle or use propane.
- Training provides general knowledge of propane and interactions with the environment, as well as common propane equipment.
- Certification is valid for 3 years.

7.3.9 Equipment/Machinery Certifications

- Only workers who are required by their scope of work or are designated to conduct work using equipment are required to receive operator training.
- Training provides operation procedures and vehicle instructions.
- Certification expiry is unique and specific to the equipment being used.
- Proof of these certifications are required to be always accessible while operating equipment.

7.3.10 Traffic Control and Signalling.

- Only required for workers directing vehicular/equipment traffic or who set up or remove traffic control measures on a roadway.
- Training provides instructions on setup and removal of traffic control measures, as well as how to direct traffic including signals.
- There is no expiry period for traffic control certifications

7.3.11 Health and Safety Representative (HSR) and JHSC

- Required for workers who volunteer or are elected as HSR or committee member.
- Training provides instructions on how to effectively exercise responsibilities and perform duties as a worker representative for workplace health and safety.
- For expiry terms see S.4 of the Health and Safety Program.

7.4 Safety Meetings and Communications

McDonald Brothers Construction Inc. acknowledges the importance of having an open communication channel between management, supervisors, and workers. MBC intends to have open discussion and information sessions regarding safety issues or developments through several forums detailed in this section.

7.4.1 Semi-Annual Safety Meetings

MBC conducts 2 company safety meetings per year. Semi-annual review meetings typically take place in February and July. These meetings are designated Winter and Summer Safety Meetings respectively. The meetings will cover safety statistics, MBC's safety goals and means of how to achieve them, observations, training, and open discussion. Any additions or changes to MBC's Health and Safety Program will also be announced at the semi-annual review meetings.

7.4.2 OHSMS Management Review Meetings

Management review meetings take place one per year. These meetings are established by management to review and analyze the effectiveness of the Health and Safety Management System and the company Health and Safety Program and Policy. These meetings determine the OHS objectives for the coming year, as well as revisions/changes to the Health and Safety Program for the coming year.

7.4.3 Safety/Trade Coordination Meetings

Supervisors and/or Superintendents are to conduct, at minimum, a monthly safety/trade meeting where they discuss safety performance over the previous month and notify workers and subcontractors of the upcoming schedule and the foreseeable safety concerns that come with project or task changes. These meetings may also advise workers of current workplace hazards and/or reference recent workplace inspections or hazard assessments. At minimum a representative supervisor from all trades should attend as needed. All attendees are to sign the safety meeting form (f7.2) handed out by the Superintendent/Supervisor, and the document maintained and sent to management. Minutes are not required.

7.4.4 Toolbox Talks

Supervisors and Superintendents are to conduct Toolbox Talks communicating to their crew relevant safety information related to current or upcoming tasks and notifying them of any recent hazards or controls that have been introduced to the workplace. This Toolbox Talk may include observations, processes, controls, hazards, and information. The Toolbox Talk is intended to act as a weekly safety briefing for workers and prepare them for the tasks to come and raise awareness on specific health and safety dangers. All Toolbox Talks are to be documented, signed by workers, and posted on the safety board. It is highly encouraged that workers contribute to the discussion during these brief meetings.

7.4.5 Other Means of Safety Communications

Other forms of safety communications include:

- **Safety Surveys**: These surveys are conduct by management and/or Health and Safety Coordinator. The purpose being to identify solutions or ongoing issues in the workplace with safety compliance and culture. This is a good opportunity to talk directly to management about any safety concerns or observations.
- **Safety Audits**: These Audits will be conducted either by a third-party consultant or a management Health and Safety Coordinator representative. Audits communicate to Supervisors and Superintendents which areas of compliance Workers are succeeding or lacking.
- **Newsletters and Emails:** Safety communications may also take place in our MBC newsletter which is distributed quarterly. Alternatively, information that needs to be communicated with a limited timeframe shall be sent in emails to appropriate parties.

7.4.6 Communication Accessibility

MBC shall ensure communication methods for those with hearing loss, vision loss, or with a different language and/or literacy skills. If you are hearing or vision impaired, make this known to your supervisor to ensure they can provide you with the best communication accommodations. Accessible methods of communication include written documentation, verbal translating of documents, traditional translation, online training/documentation, and more. Consult with your Health and Safety Coordinator if necessary.

For workers and subcontractors not speaking English or French, a translator may be used to make adequate communications with them. If a translator is not an option, use translating applications or websites to communicate with the person. Subcontractors are required to provide a translator if they intend on providing a non-english speaking worker or crew to an MBC project.

7.5 Certificate Recordkeeping

McDonald Brothers Construction Inc. recognizes the importance of recordkeeping in the workplace. We want to ensure that all personnel are properly trained and up to date on their certifications. MBC will, by means of observation or written evaluation, ensure trained workers demonstrate competency in the item they have been trained for. This policy will establish MBC's commitment to proper recordkeeping and training.

7.5.1 Evaluation, Monitoring, and Reassessment

While many health and safety courses have an evaluation segment, for those that do not MBC will reserve the ability to send an individual back to a training course if the individual does not demonstrate competency reasonably expected or gained from obtaining the certificate. This will be monitored and observed via sitedocs documentation, observation, and supervisor feedback. MBC may also create an evaluation (test) of their own if needed.

7.5.2 Training Record

All MBC employees upon hire are to provide all current and valid training certifications. Copies of the certifications are to be documented and kept by management for review. If a worker is lacking any required training, they will be required to be enrolled in training prior to completing specific tasks.

Upon any update or refresher training taken by the worker they are to notify and send a copy of any new certification to management.

7.5.3 MBC Training Needs Analysis

McDonald Brothers Construction Inc. will regularly review and inspect certifications and dates of validity of its employees. Training will be conducted in groups if possible.

In the event an employee is discovered to have a no longer valid certificate, MBC reserves the right to remove the employee from related tasks until they have been provided the required training. MBC will schedule workers for re-certification or refresher training as necessary upon notice of an approaching expiry of a certificate. All refresher training must be done under an accredited safety organization or individual. Expiry of certificates will be tracked using the SiteDocs software.

7.5.4 Document Maintenance

While a worker is employed at MBC, their personal file will contain all their valid training certifications. It is vital that training is tracked all throughout a worker's term of employment. All MBC employees will have a copy of their certificates stored in MBCs database. In addition, training certifications are maintained and logged in the health and safety software.

When a worker ceases employment, MBC will maintain their training documents for a minimum of 6 months as required by the MOL.

8 Workplace Inspections

8.1 Workplace Inspection Policy

McDonald Brothers Construction Inc. (MBC) is committed to providing employees with a safe working environment. MBC will conduct scheduled and unscheduled inspections of the workplace to keep workers safe. Inspections will take place in all settings and will be conducted by a competent person who has received instruction of these inspections. It will be standard practice to include workers in the inspection process. Each inspection shall be documented and maintained for a minimum of 3 years post-inspection so that they are accessible by required parties. MBC shall conduct all inspections as required by legislation.

MBC wishes to conduct inspections in collaboration and cooperation with all supervisors, workers, and subcontractors. MBC believes that inspection results should be accessible to all and so will ensure a policy is in place requiring all inspection reports be made available on the project. All inspection results will be reported immediately to management and relevant workplace parties including the Health and Safety Representative and MBC Health and Safety Coordinator via SiteDocs or written documentation.

8.2 Roles and Responsibilities

Management

- Direct Health and Safety Coordinator to conduct a safety inspection when required.
- Follow up with Superintendents to ensure corrective actions are implemented.
- Develop strategies for recurring issues and take note of them to discuss at the Occupational Health and Safety Management System (OHSMS) Review.
- Monitor compliance of worker inspection procedures and schedules.
- Allocate necessary resources to ensure proper inspection and corrective actions take place.

Health and Safety Coordinator

- Carry out site inspections as directed.
- Monitor compliance of worker inspection procedures and schedules.
- Ensure those carrying out inspections are knowledgeable and well informed on the criteria of the inspection report.
- Use inspection reports to identify trends to discuss at the OHSMS Review meeting.
- Follow up with the Superintendent to ensure corrective actions are implemented.

- Review specific safety trends with management to correct safety issues as soon as possible.
- Review with employees on how to conduct inspections.

Superintendent/Supervisor/Foreman

- Conduct a weekly workplace inspection using the Supervisor Weekly Inspection Form (f8.2).
- Review and communicate the report to the Health and Safety Representative on-site.
- Direct or implement corrective actions as necessary.
- Log and maintain these reports.
- Follow up on-site to ensure deficiencies/safety concerns are corrected.
- Cooperate with any external or internal auditor or inspector.
- Post all audit reports, MOL orders, and inspections in the workplace.

Health and Safety Representative (HSR) /JHSC Member

- Conduct a monthly workplace inspection using the HSR Monthly Inspection form (f8.1).
- Identify all observed safety infractions in appropriate documentation.
- Notify the superintendent of any failed inspection item and advise corrective actions.
- Review inspections with workers as necessary.
- Follow up with supervisors and Superintendent to ensure that corrective actions have been implemented.
- Respond to worker concerns regarding safety in work areas and conduct follow up inspections.

Worker

- Cooperate with all workplace inspections. Assist if possible.
- Conduct pre-use inspections of all tools, equipment, and devices.
- When beginning work in a new area, conduct an informal inspection to ensure the area is safe. All identified uncontrolled hazards should be reported to the Health and Safety Representative.

8.3 Inspections in the Workplace

There are several types of inspections that take place while working for MBC. These inspections may be scheduled or unscheduled and carried out by Workers and/or management. The MBC Office is also considered a workplace and must have an annual inspection completed. Inspection procedures are not limited to construction projects.

8.3.1 Personal Protective Equipment (PPE) Inspection

As described in S.5 – Personal Protective Equipment, a PPE inspection is a pre-use inspection done to ensure the personal protective equipment used throughout the day is up to manufacturer standard and can prevent injury or illness to the worker.

8.3.2 Circle Check Inspection

As described in S.6 – Preventative Maintenance, a circle check inspection is an inspection of equipment or vehicles done to ensure there is no required maintenance and that the machine or vehicle will not cause or increase risk of injury. Circle check documentation is to be made available to the shop technician. All policy and procedures may be found in S.6.

8.3.3 Tool Inspection

An informal (undocumented) inspection that is to be conducted before use of any tool, or power tool. If this inspection finds defective items, it is to be remove from service and reported as soon as possible.

8.3.4 Safety Survey

Conducted by a competent person from management, a safety survey is an observational inspection used to identify both positive and negative common workplace trends, practices, and safety culture; it also identifies compliance with legislative requirements. Safety Surveys oftentimes include a worker interview element. This information is generally used to make internal changes that positively improve the workplace safety culture. This inspection is documented primarily for management; however, a worker may request a copy of the report.

8.3.5 Weekly Inspection

A weekly inspection is conducted by the supervisor or Superintendent using the Supervisor Weekly Inspection Form (f8.2). These inspections seek to identify any easily observable safety issues, unsafe processes, or hazards and correct them. Inspection documents are to be maintained and available.

8.3.6 Monthly Inspection

A monthly inspection is conducted by the Health and Safety Representative or a member of the joint health and safety committee using the HSR Monthly Inspection form (f8.1). These inspections are thorough and seek to identify any safety issues, unsafe processes, or hazards and correct them. These inspections are to be posted and accessible on-site to all interested workplace parties.

8.3.7 Safety Audit/Inspection

A safety audit is either a scheduled or unscheduled inspection of the workplace that reviews conformance of the *Occupational Health and Safety Act*, *Regulation 213/91: Construction Projects,* and MBC's Health and Safety Program. This inspection is the primary source used to measure MBC's overall safety performance. All audits are documented and should be made accessible on the job site. The criteria of these inspections are subject to change.
Safety Audits can be conducted by management, the Health and Safety Coordinator or a third-party consultant.

8.3.8 Ministry of Labour, Training and Skills Development Audit

The MOL may conduct unscheduled audits to identify violations of the *Occupational Health and Safety Act,* and *Regulation 213/91: Construction Projects.* This inspection can be very thorough and may result in fines to any personnel on-site or a site shutdown.

8.3.9 Personal Protective Equipment (PPE) Inspection

As described in S.5 – Personal Protective Equipment, a PPE inspection is a pre-use inspection done to ensure the personal protective equipment used throughout the day is up to manufacturer standard and can prevent injury or illness to the worker.

8.3.10 Circle Check Inspection

As described in S.6 – Preventative Maintenance, a circle check inspection is an inspection of equipment or vehicles done to ensure there is no required maintenance and that the machine or vehicle will not cause or increase risk of injury. Circle check documentation is to be made available to the shop technician. All policy and procedures may be found in S.6.

8.3.11 Tool Inspection

An informal (undocumented) inspection that is to be conducted before use of any tool, or power tool. If this inspection finds defective items, it is to be remove from service and reported as soon as possible.

8.3.12 Weekly Inspection

A weekly inspection is conducted by the supervisor or Superintendent using the Supervisor Weekly Inspection Form (f8.2). These inspections seek to identify any easily observable safety issues, unsafe processes, or hazards and correct them. Inspection documents are to be maintained and available.

8.3.13 Monthly Inspection

A monthly inspection is conducted by the Health and Safety Representative or a member of the joint health and safety committee using the HSR Monthly Inspection form (f8.1). These inspections are thorough and seek to identify any safety issues, unsafe processes, or hazards and correct them. These inspections are to be posted and accessible on-site to all interested workplace parties.

8.3.14 Safety Audit/Inspection

A safety audit is either a scheduled or unscheduled inspection of the workplace that reviews conformance of the *Occupational Health and Safety Act*, *Regulation 213/91: Construction Projects,* and MBC's Health and Safety Program. This inspection is the primary source used to measure MBC's overall safety performance. All audits are documented and should be made accessible on the job site. The criteria of these inspections are subject to change.

Safety Audits can be conducted by management, the Health and Safety Coordinator or a third-party consultant.

8.3.15 Ministry of Labour, Training and Skills Development Audit

The MOL may conduct unscheduled audits to identify violations of the *Occupational Health and Safety Act,* and *Regulation 213/91: Construction Projects.* This inspection can be very thorough and may result in fines to any personnel on-site or a site shutdown.

8.4 Inspection Procedures

8.4.1 Monthly Inspection

- Print a copy, download digitally, or access online, f8.1 HSR Monthly Inspection.
- Conduct inspection by going through the entire form, marking items as Pass, Fail, or N/A.
- Correct any simple condition or hazard prior to making note of this in the form.
- Once complete, notify the Superintendent of your findings and send the inspection to MBC health and safety coordinator and save the form in the safety software.

8.4.2 Weekly Inspection

- Print a copy, download digitally, or access online, Supervisor Weekly Inspection (f8.2).
- Conduct inspection by going through the entire form, marking items as Pass, Fail, or N/A.
- Correct any simple hazard prior to making note of this in the form.
- Once complete, notify the Superintendent of your findings and send the inspection to MBC Health and Safety Coordinator and save the form in the safety software.

8.4.3 Safety Audit

- Safety audits may be scheduled or unscheduled. Ensure that when conducting unscheduled audits that neither the Superintendent nor workers know you are doing so before arrival.
- Upon arrival on site, access the Safety Audit Form in SiteDocs.
- May be accompanied by the Superintendent and the Health and Safety Representative.
- Read the criteria and instructions within the Audit Form and fill out any required information.
- Conduct the audit by completing the Audit form in its entirety.
- When complete, copy the audit, post the copy in the job-site trailer, and send the completed audit to MBC Health and Safety Coordinator and HSR.

9 Investigations and Reporting

9.1 Investigations and Reporting Policy

McDonald Brothers Construction Inc. deems health and safety of all workers to be of the highest priority. MBC is committed to providing a safe and healthy work environment for visitors, subcontractors, workers, supervisors, superintendents, and management. While MBC is focused on prevention and reduction of injury on our projects; near misses, violence, harassment, company infractions, and more remain a possibility. When there is an occurrence of these issues Management acknowledges the event is to be both reported and investigated in compliance with all legislative requirements outlined in the *Occupational Health and Safety Act* and *Regulation 213/91.*

All persons on site or involved with MBC must abide by the investigation process, including the reporting of all work-related incidents, near misses, violence, harassment, and company infractions. Once reported these incidents will be documented and properly investigated following MBC procedures.

Currently, MBC's Health and Safety Program includes the following investigative procedures:

- Incidents involving injury (Including no lost time injuries and occupational illnesses)
- Near misses
- Violence or harassment allegations
- Company rule infractions (see S.3 – Company Rules)
- Observed hazards
- Fires/Property Damage
- Environmental spills
- Any incident which may cause psychological injury to any worker

All MBC investigation procedures and forms are to be made accessible. Access to these procedures ensure that there is a quick and efficient response to incidents so the effects can be mitigated, workers protected, and corrective action quickly identified and implemented. All investigative processes will be conducted in a professional manner, and any opportunity for continual improvement will be identified and reported or documented.
MBC investigations will be directed by a health and safety coordinator and may be conducted by personnel involved in health and safety. All personnel involved with MBC have a responsibility to comply with the legislative requirements, MBC Health and Safety Program, procedures, and cooperate with all investigations as required. The investigations and reporting policy and

procedures will be reviewed on an annual basis by management and is subject to change to ensure they meet all legislative requirements and are effectively implemented and communicated to workers.

9.2 Roles and Responsibilities

All workers, supervisors, management, subcontractors, and visitors have responsibilities pertaining to workplace investigations and reporting. See below:

Management

- Ensure investigation and reporting procedures are created and available to workers.
- Ensure review of investigation and reporting policy and procedures annually.
- Ensure all procedures have appropriate documentation and forms. Records must be kept.
- Conduct all classes of investigations as needed.
- Provide designated investigators who shall be considered as competent.
- Authorize corrective actions as determined by investigation results.
- Ensure investigations are completed within 24 hours of any incident.
- Ensure all HSRs and JHSC members are appropriately trained in investigations as needed.
- Ensure incidents are reported to the JHSC or HSR.
- Report all fatalities or critical injury to the Ministry of Labour immediately as per *OHSA.*
- Submit reports to the MOL as needed with assistance from Superintendent or HSR.
- Report lost time injuries or injuries requiring professional medical care to WSIB within 72 hours.
- Continually promote, encourage, and educate Workers on investigative and reporting practices.

Superintendent/Supervisor/Foreman/HSR

- Secure the scene of any incident that occurs on-site. Use barriers as necessary to prevent access.
- In case of personal injury, the Superintendent shall ensure the injured employee(s) receives appropriate healthcare and safe transportation to medical services.
- Report all incidents to the MBC Health and Safety Coordinator as soon as it is safe to do so.
- Perform all initial incident investigations, report findings to the MBC Health and Safety Coordinator within 24 hours.
- Report any suggested corrective actions and contributing factors to any incident.

- Assist MBC health and safety personnel with additional corrective or preventative actions.
- Implement all corrective or preventative actions required or suggested by MBC health and safety personnel.
- Complete any required investigation or reporting documentation and forms promptly.
- Respond to any observed hazard forms with corrective action or recommendation within 24 hours.
-
- **Worker/Subcontractor**
- Report all incidents, near misses, violence, harassment, and observed hazards immediately to supervisor, Superintendent, or HSR.
- Participate in workplace investigations as required, including completion of appropriate forms.
- Participate in implementation and suggestion of corrective and preventative action.
- Comply with all legislative requirements, and the MBC Health and Safety Program.
- Subcontracted workers are to report all incidents to their direct supervisor who will report the incident to MBC health and safety personnel or management immediately.

Designated Investigator

- A designated investigator may be the Health and Safety Representative, or Health and Safety Coordinator.
- Promptly investigate all incidents.
- Interview workers involved in any incident.
- Interview witnesses to any incident separately to ensure they do not obscure their accounts of the event.
- Document all investigative processes using the proper forms.
- Identify contributing factors, corrective and preventative actions, and root causes of any incident. Refer to ***PEMCEP*** (S.2).
- Distribute all forms to appropriate parties regarding the investigation being conducted.
- Consult with MBC health and safety personnel as required.
- Any corrective or preventative action is to be communicated to workers.

9.3 Investigating and Reporting Procedures

It is very important to take action and mitigate any additional consequences of an incident. Include all instances of damage/consequences within a report so that each issue may be properly corrected.

9.3.1 Injury Reporting Procedure

Incidents are to be reported as soon as possible. It is crucial once an incident occurs to not disturb or alter the scene of the incident. If a workplace incident occurs, follow this procedure.

1. Report to supervisor of worker injury. Supervisor should retrieve a valid first aider (unless they are one themselves) and come to the scene of the incident.
2. First aider will conduct first aid procedures and determine in conjunction with the injured worker if the injury is serious enough for medical attention.
3. In the event of a serious injury, first aider or the Superintendent will ensure an ambulance is called and the worker is transported to the nearest hospital.
4. Superintendent is to then report the incident to the MBC Health and Safety Coordinator as soon as possible.
5. The condition of the worker and all medical instruction given by a certified healthcare professional must be reported to management and the MBC Health and Safety Coordinator.
6. If worker requires medical treatment WSIB must be contacted via Form 7 within 3 days.
7. MBC will then notify all required parties, this may include the workers family, workers, supervisors, JHSC, H&S Representative, WSIB or the Ministry of Labour.
8. In case of critical injury or fatality the incident is to be reported immediately to the Ministry of Labour.

9.3.2 Observed Hazard/Near Miss Reporting

While no worker may have been injured in an incident, it must still be reported. Generally near misses are indicators that current controls are inadequate at protecting workers and must be corrected. MBC workers are to appropriately report any hazard or near miss identified on the jobsite.

1. In the event of a near miss or observed hazard, report as soon as possible to the Superintendent or health and safety representative.
2. The health and safety representative or worker will obtain the observed hazard form (f9.4) or the worker will access the observed hazard form in the safety management software.
3. The observed hazard form will be completed, and all information filled accordingly.
4. Implement necessary corrective actions.

5. The report will then be sent to the MBC Health and Safety Coordinator where they will review the method of corrective action. In the event the correction is not adequate, Health and Safety Coordinator may contact the HSR or make an appearance on site to implement proper controls.

9.3.3 Incident Investigation Procedure

All incidents resulting in serious, critical, or fatal worker injury will be investigated by a member of MBC's health and safety personnel. Below is the procedure for completing a proper investigation.

1. HSR (or Superintendent) will conduct an informal initial investigation to retrieve the baseline details, who was involved, location of the incident, and potential witnesses.
2. Using the incident investigation report (f9.3) the MBC investigator will first retrieve the information from the Superintendent and examine the scene.
3. In the event of critical injury or fatality, investigator is to cooperate with the Ministry of Labour.
4. Cross reference the information provided from the Superintendent with the injured worker if possible.
5. Retrieve statements from any witnesses using the Witness Statement form (f9.2). Conduct interviews of witnesses quickly to ensure that information provided is as accurate as possible. Have witness speak about the incident in their own words and ensure that witnesses are interviewed separately.
6. Read the Witness Statement back to the witness. If the statement is correct, witness will sign the bottom of the page.
7. Witness statements are to be attached to incident investigation reports along with any images or pictures of the scene or relevant items.
8. Retrieve feedback from witnesses and victims about what they feel the best corrective measure would be.
9. Considering worker feedback, create a proper correction to the cause of the incident and notify the Superintendent and HSR/JHSC.
10. All investigation reports are to be documented and maintained for a minimum of 3 years.
11. The incident will be discussed in the following JHSC minutes and will further identify recommendations to ensure the incident will not happen again.

9.4 Communications

9.4.1 Regarding media

- Make no comments to the media. Refer all inquiries to MBC Management.

9.4.2 Regarding Results of Injury/Incidents including corrective actions

- Communicated via minutes of the joint-health and safety committee meetings.
- Communicated via weekly toolbox talks and other health and safety communications.
- Communicated via safety bulletin board.

9.5 OHSA Legislation on Reporting

OHSA Regulation 420/21: Reports Under Sections 51-53.1 of the Act

Critical Injury means an injury of a serious nature that:

a) Places life in jeopardy
b) Produces unconsciousness
c) Results in substantial loss of blood
d) Involves the fracture of a leg or arm but not a finger or toe
e) Consists of burns to a major portion of the body, or;
f) Causes the loss of site in an eye

If a Worker is critically injured or killed, a written report or notice must contain the following:

1. The name, address, and type of business of the employer
2. The name of the worker injured, killed, disabled, or required medical attention.
3. The nature of the bodily injury or occupational illness
4. The name and address of the constructor if the occurrence is at a project
5. The address of the worker
6. The nature and circumstances of the occurrence, including a description of any machinery, equipment, or procedure involved.
7. The time, date, and place of occurrence
8. The name and address of the legally qualified medical practitioner.

If a worker is disabled from the incident, a written report or notice must contain the following:

1. The nature and circumstances of the occurrence, including a description of any machinery, equipment, or procedure involved.
2. The time, date, and place of occurrence.

All reports must contain the names and addresses of any witnesses to the occurrence and the steps taken to prevent a recurrence or further illness.

Furthermore, physical injury is not the only time a notice or report must be Submitted. A report must be made if any of the following occur:

a) A Worker falls a vertical distance of 3 meters or more
b) A Worker falls and the fall is arrested by a fall arrest system other than a fall restricting system
c) A Worker becomes unconscious for any reason
d) There is accidental contact by a Worker or by a Worker's tool or equipment with energized electrical equipment, installations, or conductors
e) There is accidental contact by a crane, similar hoisting device, backhoe, power shovel, or other vehicle or equipment or its load with an energized electrical conductor rated at more than 750 volts
f) There is a structural failure of all or part of falsework designed by, or required by Ontario Reg. 213/91 (Construction Projects) to be designed by a professional engineer.
g) There is a structural failure of a principal supporting member, including a column, beam, wall or truss of a structure
h) There is a failure of all or part of the structural supports of a scaffold
i) There is a structural failure of all or part of an earth or water retaining structure, including a failure of the temporary or permanent supports for a shaft, tunnel, caisson, cofferdam, or trench
j) There is a failure of a wall of an excavation or of similar earthwork with respect to which a professional engineer has given a written opinion that the stability of the wall is such that no Worker will be endangered by it
k) There is an overturning or a structural failure of all or part of a crane or similar hoisting device

For the involvement of failure of a structure, wall of an excavation, or crane or hoisting device, a professional engineers written opinion stating the cause of the occurrence may be supplemented for the written notice.

The employer or constructor must retain a copy of a written notice or report of an incident for at least 3 years after the date the notice or report is made. This report may be submitted via a form on the ministry website or by the employer's in-house incident reporting form if it has all the required information.

10 Emergency Preparedness

10.1 Emergency Preparedness Policy

McDonald Brothers Construction Inc. is committed to having an emergency plan in place for each workplace, to assist employees and workers to adequately respond to any emergency. All MBC workplaces will have the necessary information and equipment to respond appropriately in the event of an emergency. MBC has a policy in place to minimize the risk of injury to workers while acknowledging the difficulty in removing risks completely from the workplace. We are dedicated to providing the proper emergency response required to mitigate incident and injury.

MBC provides a company standard for emergency response. Each Construction Project will have a ~~unique and~~ developed emergency plan regarding fall rescue, natural disasters, fire, and evacuation. The Site-Specific Safety Plan will be made available to all workers, subcontractors, and visitors within the Construction Project. Each Construction Project may also have unique procedures to ensure that injured Workers receive timely and proper treatment.

Being prepared is essential to minimizing injuries and property damage. The following items are a few options to ensure emergency preparedness:

- Emergency Response Plans
- Injury Response Plans
- Emergency Phone Number Lists
- First Aid Kits
- Trained First Aiders
- Fire Extinguishers
- Safety Data Sheets
- Evacuation Plans and Muster Points

10.2 Roles and Responsibilities

Management

- Create, develop, and implement all emergency plans and monitor compliance of procedures. Ensure they have been made publicly available in the workplace.
- Coordinate proper training and communication of all emergency response procedures.
- Make available all necessary resources required to run effective emergency plans.
- Ensure there is a minimum of 1 trained first aid worker on every active Construction Project.
- Review program effectiveness and collect feedback from Superintendents, supervisors, and workers.
- Schedule regular review of this program and update the policy as required.
- Monitor training records of all Designated First Aiders and facilitate retraining.
- Ensure first aid supplies, posters and forms are available and adequately stocked.
- Organize evacuation drills once per year at minimum for projects exceeding a years duration, and once per year for the office.

Superintendent

- Develop a site-specific emergency response plan and review with MBC Management and HSR.
- Review and communicate site-specific emergency response plans with all Construction Project Workers, Visitors, Subcontractors.
- Post the emergency response plan in the workplace where it is accessible by all workers.
- Ask workers and supervisors to be part of the emergency response team.
- Ensure workers with a valid certification are designated first aiders.
- Contact management and Health and Safety Coordinator as soon as it is safe to do so in the event of an emergency.
- Ensure identity of Designated First Aiders is posted and accessible in the site trailer.
- Coordinate evacuation drills with management and take a leadership role in the evacuation process.
- Oversee the transportation and treatment of injured workers to emergency services.

Supervisor/Foreman

- Review and abide by established emergency response plans and ensure workers under their care also understand the emergency response plans.

- Take initiative in responding to emergencies as they occur, direct the response appropriately.
- Participate in any workplace investigation as required.
- Evacuate emergency areas as needed and play an active role in emergency response.
- Remain in muster point area after any emergency or evacuation until a head count is conducted and further instruction or clearance is given.

Worker

- Review and abide by established emergency response plans.
- Report all workplace emergencies immediately to direct supervisor or the Superintendent.
- Follow directions of supervisor, Superintendent, or HSR to ensure the work area is made safe.
- Evacuate emergency areas as needed.
- Remain in muster point area after any emergency or evacuation until a head count is conducted and further instruction or clearance is given.
- Participate in any workplace investigations as required.
- Inform the supervisor of any workplace injuries as soon as possible.
- Know the location of the Designate First Aiders poster.

Health and Safety Representative (HSR)

- Review and abide by established emergency response plans.
- Assist Superintendent and supervisors in response to on-site emergencies.
- If neither a Superintendent or supervisor is available or unable to perform their duties, the HSR will take the lead role in responding to the emergency.
- Assist and cooperate in any workplace investigations as required.
- Monitor and inspect first aid kits at least monthly, advise the Superintendent when supplies require replenishing.

Designated First Aider

- Review and abide by established emergency response plans.
- Provide first aid assistance to injured persons when it is safe.
- Monitor condition of injured workers.
- Provide a first aid summary to local emergency services upon arrival.
- Assist and participate in any workplace investigations as required.
- Have knowledge of First Aid Kit locations throughout the Construction Project.
- Assist or complete appropriate documents as necessary.

10.3 First Aid and Injury Response

Injuries may happen at any workplace, acknowledging this fact is crucial to have a proper response plan in action to manage and treat work related injuries as they occur. MBC will ensure that developed procedures are available for the handling of injury situations. Below is the company standard practices of injury response and first aid.

Minor injuries will be treated on site by a Designated First Aider. Should an injury of a more serious nature be encountered, the first aider will provide appropriate first aid until professional medical assistance can be provided. First aiders are protected via the Good Samaritan Act.

10.3.1 FIRST AID PROCEDURE

- In the event a worker is injured on the job, the Designated First Aider is to take charge and immediately treat the injury according to training.
- Any incident must be reported to the worker's supervisor as soon as it is safe to do so.
- In the event of a medical emergency and it is determined the worker requires treatment at the nearest hospital, first aider will ensure the transportation of the injured worker to such a facility. If needed, call an ambulance.
- When calling 911 state the follow information: An ambulance is required, we are located at [Project Address], provide patient information, details of the injury, ongoing first aid treatment, and send personnel to meet the ambulance.
- Wait with the worker for an ambulance or health service to arrive, while waiting, clear the area of hazards as much as possible to ensure that arriving medical assistance may not be impeded.
- Superintendent is to call and notify MBC Health and Safety Coordinator as soon as possible.
- Record in the Record of First Aid Treatment Form (f10.1) which items were used in treatment of injured worker.

- Be ready to participate, cooperate, and assist with any potential investigation.
- An injured worker is not permitted to drive themselves to the hospital. MBC will provide transportation to the hospital, doctor's office, or worker's home when necessary, following an injury or illness

10.3.2 Naloxone Kits

Each workplace is supplied with 2 naloxone kits to prevent opioid overdose if encountered. Within each kit, there is an information package outlining the symptoms of opioid overdose and the procedure to safely administer naloxone. Naloxone expires within 3 years, upon expiry contact the Health and Safety Coordinator. Consult your Superintendent about where the naloxone kits are kept.

10.3.3 First Aid Kits

First aid kits and supplies requirements are identified in the Workplace Safety Insurance Board (WSIB) Act, Regulation 1101. They are separated into categories depending on the size of the workforce on any given project or office. See next page for these requirements. Each Construction Project shall have a first aid station located as to be always accessible for the prompt treatment of any worker. A Record of first aid treatment form shall be made available on-site and shall be completed for all incidents requiring treatment. The following table will identify quantities of supplies required.

Items Required in First Aid Kit	Number of Workers / Quantities Required		MBC Fleet Vehicle
	0 – 15	16 - 200	
St. Johns Ambulance First Aid Manual	1	1	1
Safety Pins	1 card	24	1 card
Basin	-	1	-
Splints of Assorted Sizes	-	6	-
Rolls of Splint Padding	-	2	-
Dressings:			
Individually Wrapped Adhesive	24	48	16
25mm Wide Adhesive Tape	-	2	-
25mm Wide Gauze Bandage	-	12	-
76x76mm Sterile Gauze Pad	12	48	6
50mm Gauze Bandage	4	8	4
100mm Gauze Bandage	4	8	2
Triangular Bandages	6	12	4
Individual Sterile Surgical Pads Suitable for Pressure Dressings	4	6	2
Items Required at Site Office			
Stretcher	-	1	-
Blankets	-	2	-
Eye Wash Station	Minimum 1	Minimum 1	-
Spill Kit	Minimum 1	Minimum 1	-

- **Note: For more than 200 workers, see reg. 1101**

In addition to the above legislated items, MBC may also provide kit scissors, alcohol/anti-septic wipes, and a single-use CPR mask. Additional items will be added to kits as required.

10.4Emergency Equipment

For Construction Projects located within a building or facility which has an existing emergency and evacuation plan, Management and the Supervisor must learn it and establish only those procedures necessary to complement the Construction Project specific emergency plan.

10.4.1 Emergency Equipment Required On-Site

Several items are required on-site for emergency preparedness:

- One stretcher (For 16-200 workers regularly employed on a project)
- Two blankets (For 16-200 workers regularly employed on a project)
- Emergency signaling device such as air horns
- Emergency phone number contact list
- A first aid station with a first aid kit
- Fire extinguishers reasonably distance along paths of travel and site access/stairwells

10.4.2 LOCATIONS OF FIRE EXTINGUISHERS

- MBC Office
  - Various locations throughout the building near stairwells and points of egress.
- Construction Projects
  - Various locations on-site reasonably distanced.
  - Trades performing hot work activities must have their own suitable extinguisher readily available.

They will also be placed:

- At refueling and temporary heating locations
- In a non-congested area, not in the path of travel, but to always remain visible.

10.4.3 LOCATIONS OF FIRST AID KITS

- MBC Office
  - In the kitchen area with a list of certified first aiders of the office.
- Construction Projects
  - In the site-office/trailer with a list of Designated First Aiders.
  - May have additional first aid kits at stations situated to minimize distance created by size of a Construction Project

10.4.4 First Aid Kit Inspection

The HSR is to complete the First Aid Inventory Checklist (f10.2-10.3) once a month per kit to demonstrate the kit has all the required inventory to effectively treat a first aid situation on-site. This includes checking for expired items and ensuring an adequate number of the supply is available by the standards outlined in regulation 1101. Conduct a regular informal inspection of emergency equipment to ensure items are maintained and in good working condition.

10.5 Civil Emergency Procedures

If a civil emergency occurs, as a workplace, we may be directed by the governing authorities (first responders, RCMP, Government Authorities, etc…) to take action to protect ourselves. The source of a civil emergency can vary, and stem from natural disasters, terrorist events, vigilantes, etc. The following guidelines must be adhered to:

UPON DIRECTION TO EVACUATE AREA BY AUTHORITIES

- Upon being notified, the Superintendent will activate the emergency evacuation air horn.
- Workers must stop their activities and lock-up their tools (if possible given time sensitivity).
- If safe to do so, equipment operators should lock their equipment to prevent equipment being used from unauthorized personnel.
- Workers will be directed to the designated muster point to conduct a head count and quick debrief.
- The Superintendent will be the last to leave and ensure the gate or access to the Construction Project is locked.
- Workers can only return once directed or given clearance by the authorities.

UPON DIRECTION TO LOCKDOWN AREA BY AUTHORITIES

- Upon being notified, the Superintendent will ensure the gate(s) is locked and depending on the phase of the project will direct the Workers to a safe area in the building or in the site trailer.
- Workers will lock-up their tools or place them somewhere safe nearby if time is available.
- If safe to do so, equipment operators should lock their equipment to prevent equipment being used from unauthorized personnel.
- Whenever possible the building’s access points will be locked and secured.

- When/If safe to do so, a head count will be conducted. This can be done by use of cell phones.

- In all cases, always adhere to the directives of the authorities.
- Report any suspicious individuals around or in the Workplace to authorities.
- NEVER attempt to apprehend an individual unless you are in imminent danger.

10.6 Training and Drills

- All employees must receive training and awareness on the procedures of emergency evacuation via Construction Project specific orientation.
- Employees who are or may be required to use a fire extinguisher will receive adequate instruction and guidance to effectively use them. The Pull, Aim, Squeeze, Sweep (PASS) method is found in this section.
- The workplace will go through an evacuation drill annually to determine its effectiveness and improve these measures if required.
- The drill findings will be reviewed by management.
- Construction Project evacuation drills will take place as required by either the client or local authorities, or if MBC wishes to conduct a drill to determine effectiveness of evacuation strategy.

10.7 Evacuation Plans and Procedures

A Site-Specific Safety Plan (SSSP) will be developed and implemented for each project prior to starting work. Evacuation plans and procedures will be included in the Site-Specific Safety Plan. Air horn, emergency phone numbers, and evacuation plans are posted on the notice board. When an emergency or uncontrollable hazard exists that requires evacuation the following procedures apply:

10.7.1 Construction Project Emergency Evacuation

- Vacate the immediate area of the emergency or hazard.
- Sound the air horn with 1 long blast.
- Contact the Superintendent or designated person to report the incident.
- Superintendent or designated person will call 9-1-1.
- Vacate the site through the designated egress and meet at the designated muster area. Evacuation plan indicating emergency exits as per the Site-Specific Safety Plan.

- Assemble in the designated muster area, do not leave until authorized by the Superintendent.
- Each Foreman or Supervisor is to account for all members of their on-site crew and report findings to the Superintendent.
- Render first aid to anyone who needs it.
- A designated person will meet the emergency services and advise them of any potential hazards such as compressed gas storage and any missing Workers.
- Superintendent will then notify MBC head office of the evacuation and circumstances.

10.7.2 Office Emergency Evacuation

Emergency phone numbers are posted on the safety board. Fire and evacuation plans are posted at exits and stairwells. Emergency Evacuation Procedure:

- Vacate the immediate area of the emergency or hazard.
- Obtain assistance from another worker to notify office staff to evacuate.
- A designated person is to call 911.
- If the emergency can/will affect adjoining businesses; a designated person must immediately go and advise them to vacate.
- Vacate the office through the designated egress and meet at the designated muster area.
- Assemble in the designated muster point, DO NOT LEAVE until authorized by the office manager. NEVER GO BACK INTO THE BUILDING TO LOOK FOR ANOTHER WORKER.
- A designated person will meet the emergency services upon their arrival and advise them of any missing person.

10.8 Fall Rescue Plan

MBC recognizes the importance of having an appropriate fall rescue plan in place for each Construction Project to retrieve Workers after a suspended fall and preventing them from succumbing to suspension trauma. MBC will take all reasonable precautions to protect Workers from injury, and to rescue Workers in a life threatening or dangerous situation. The following are standard rescue plans and procedures. Each Construction Project might be required to create their own unique rescue plan due to varying conditions and environment. Reference this rescue plan as needed.

Suspension Trauma

After a worker falls and is caught by his/her fall protection harness, the danger is not over. The fallen Worker's blood circulation is restricted, causing a condition known as "suspension trauma".

Definition: **Suspension trauma** (also known as "harness-induced pathology", or "suspension syndrome") is the natural physiological response to the human body being held motionless in a vertical position for a period resulting in numbness, a drop in blood pressure and heart rate, nausea, or loss of consciousness. This loss of circulation is what makes suspension trauma such a danger and is why a timely fall rescue plan is dire on every jobsite. Relief straps can help prevent suspension trauma and use of these straps are encouraged by MBC.

10.8.1 Standard Fall Rescue Plan

The rescue of a worker whose fall has been arrested and is awaiting rescue while being suspended in their safety harness needs to be undertaken as quickly as possible for several reasons**:**

1. The worker may have suffered injuries during the fall and may need medical attention.
2. Workers suspended in their safety harness for long periods may suffer suspension trauma.
3. Suspended workers may panic if they are not rescued quickly.
4. The events that led to the fall may create additional risks that need to be addressed.
5. If a suspended Worker can climb back onto the surface from which they fell (with or without assistance from another secured Worker), they should do so.

A. IF AN ELEVATING WORK PLATFORM (EWP) IS AVAILABLE ON SITE:

A1. Bring the EWP to the accident scene and use it to reach the suspended Worker.
A2. Ensure that rescue Workers are wearing full-body harnesses attached to appropriate anchors in the EWP
A3. Ensure that the EWP has sufficient load capacity for both the rescuer(s) and the victim.
A4. If the victim is not conscious, two rescuers will be needed to safely handle the weight of the victim.
A5. When the Worker is safely on the EWP, reattach the lanyard to an appropriate anchor point on the EWP, if possible.
A6. Lower the Worker and arrange for them to be treated for suspension trauma and any other injuries.
A7. Arrange for transport to nearest hospital.

B. IF NO ELEVATING WORK PLATFORM IS AVAILABLE:

B1. Where possible, use ladder(s) to reach the victim.
B2. Rig separate lifelines and fall arrest equipment for rescuers to use while assessing the victim from the ladder(s).
B3. If victim is not conscious or cannot reliably help with their own rescue, at least two rescuers will be needed.
B4. If the victim is suspended from a lifeline, move them to an area that can be safely reached by the ladder(s), where possible.
B5. If victim is suspended directly from their lanyard or from a lifeline, securely attach a separate lowering line to the victim's harness. Other rescuers will lower the victim while being guided by the rescuer on the ladder.
B6. Once the victim has been brought to a safe location, administer First Aid and treat the person for suspension trauma and any other injuries.
B7. Arrange for transport to nearest hospital.

C. IF THE INJURED PERSON IS SUSPENDED NEAR THE WORK AREA AND CAN BE SAFELY REACHED FROM THE AREA THEY FELL FROM OR THE FLOOR BELOW:

C1. Ensure that rescuers are protected against falling with appropriate equipment.
C2. If possible, securely attach a second line to the Workers' harnesses to assist in pulling them to a safe area. (NOTE: more than two strong Workers will be needed to pull a victim to rescue.)
C3. Always prefer to pull a Worker to an opening or landing adjacent to where they are suspended. If there is no way to move Worker to an adjacent landing, pull them upwards instead.
C4. Ensure that any slack in the retrieving lines is taken up to avoid slippage.
C5. Once the victim has been brought to a safe location, administer First Aid and treat the person for suspension trauma and any other injuries.
C6. Arrange for transport to the nearest hospital.

D. IF THE SUSPENDED WORKER IS UNCONSCIOUS AND MAY NOT SAFELY BE REACHED

D1. Specialized rescue techniques are needed for this type of situation. It may involve a rescuer rappelling or being lowered down to the victim. It may involve using the lifeline to retrieve the fallen Worker. It may require the use of high-reach emergency equipment.

D2. Due to the inherent risk to the rescuers and/or the victim, this type of rescue should not be undertaken by people without specialized training and experience. RESCUERS MUST BE QUALIFIED, If none are qualified, do what can be done to provide suspension relief for the victim and wait for EMS.

10.9 Fire Orders and Extinguishers

Fire Orders Upon Discovery

- Warn Persons nearby by citing “FIRE-FIRE-FIRE” or similar
- Leave the area of danger
- Sound the alarm or air horn
- Close all doors in your path of exit upon leaving
- Call 911 from a safe location. Provide all relevant information to the event, such as municipal address, building name, interception, site access location, location of fire, and nature of fire if known
- Only fight the fire if is safe to do so, and the fire is not between you and the exit.
- If you encounter smoke in the stairwell or corridor, use an alternate exit. It might also be safer to remain in your area away from smoke collection.

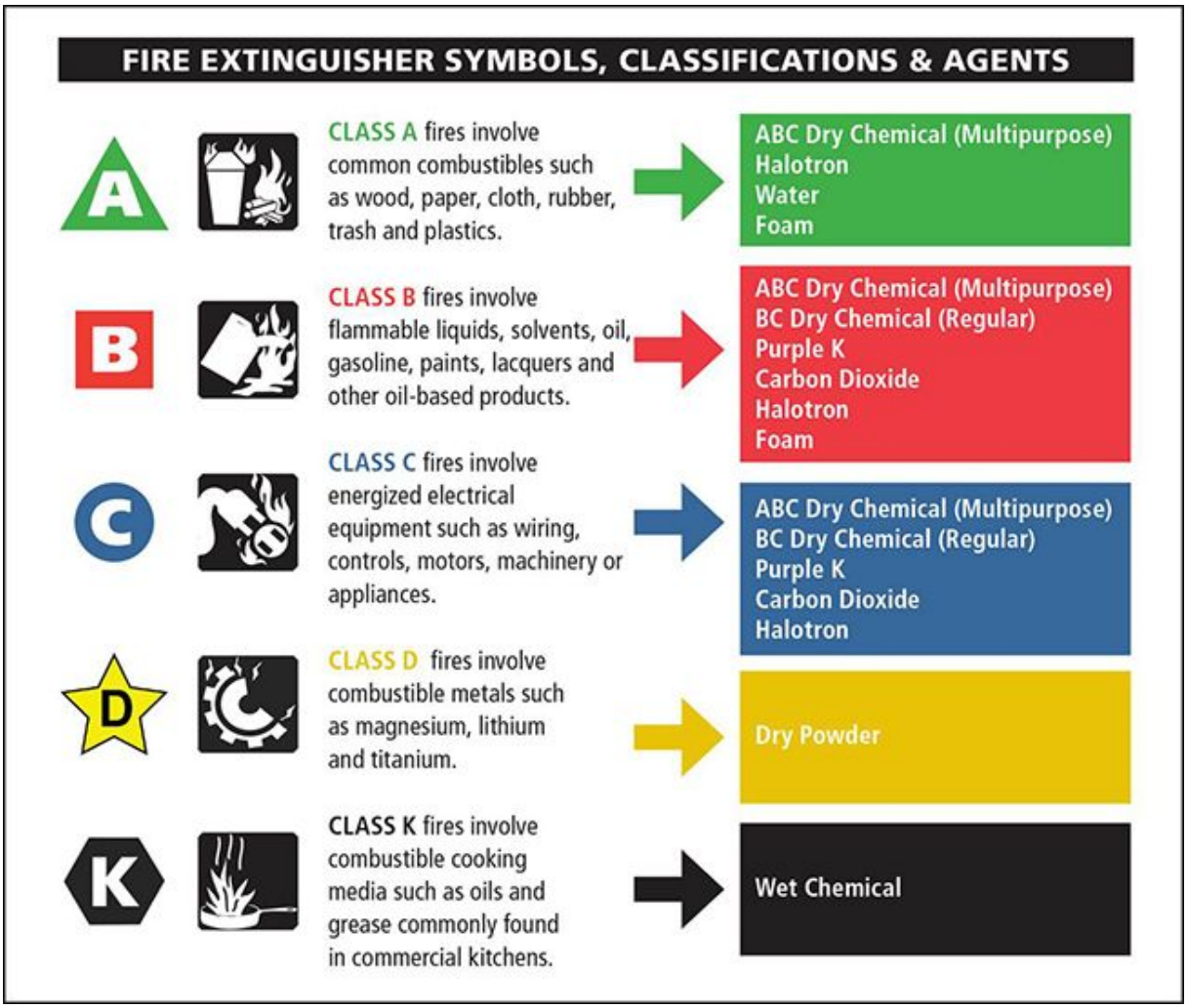
Fire_Triangle

The creation of a fire is caused by 3 things, the interaction of Heat, Oxygen, and Fuel. Understanding this is key to fire prevention. Before you conduct work with a source of heat, ask yourself if there is any available fuel nearby that could ignite. Most fires require only 16% oxygen content to burn, and air contains about 21% oxygen on its own, making fires more of a likely occurrence than would like to be believed. Always be mindful of your surroundings.

10.10 Fire Extinguishers

MBC is committed to ensuring that fire extinguishers are readily available and accessible to all workers in situations where they are required. This subsection of the program will identify types of extinguishers and their uses. Preventing fires eliminates the need for a fire extinguisher, proper housekeeping, and following hot work procedure is crucial as it minimizes the number of flammable items which are exposed to sources of ignition.

Project Superintendents may request additional fire extinguishers from management if they discover the current number of extinguishers is inadequate to cover and protect the grounds of the project. Management may also substitute or replace current extinguishers on a project for the purpose of recertification.

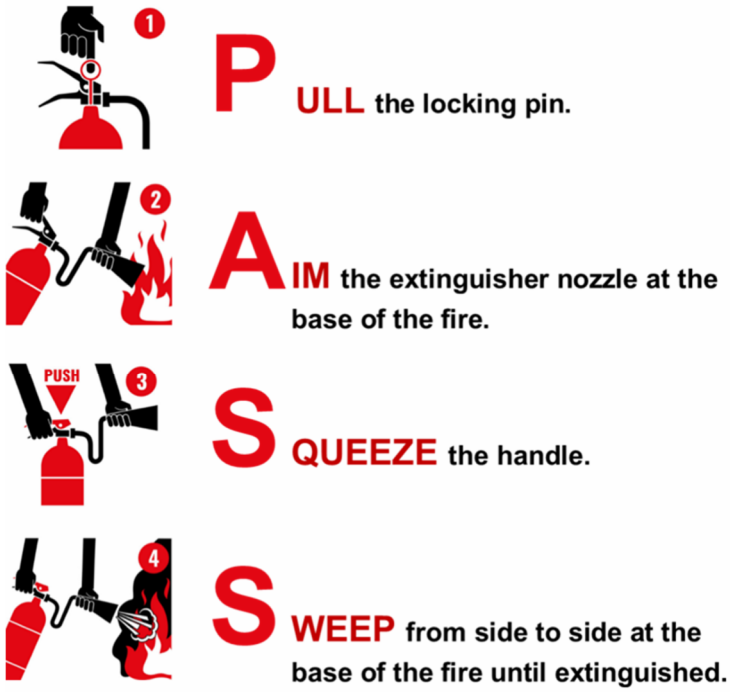


MBC workplaces most common classes of fire are Class A, B, and C.

It is for this reason that MBC jobsites and the head office always require a dry chemical fire extinguisher. Fire extinguishers must be inspected at least once per month and noted on the inspection tag. If a fire extinguisher is discharged for any reason the office must be contacted immediately so they can document the situation and follow up as necessary. **Any fire extinguisher which is damaged or discharged must be promptly removed from service and replaced.**

10.10.1 How to use a Fire Extinguisher

In the event you need to use an extinguisher, use the Pull, Aim, Squeeze, Sweep (PASS) method.



10.10.2 Fire Extinguisher Inspections

Below is the procedure for the inspection of a fire extinguisher:

1. Inspection is to be conducted by a competent Worker once a month, and the inspection tag signed by the person.
2. Extinguisher must be fully charged with the gauge in the green.
3. The pin which prevents accidental discharge (on the handle) and the plastic anti-tamper seal (which keeps the pin in place) must be intact.
4. Cylinder must be free of dents, excessive rust, leakage, and any other sign of excessive wear.
5. Nozzle and hose must be free of debris or damage.
6. All labels on the fire extinguisher must be legible.
7. Annual certification by an authorized company must be current and confirmed by an inspection tag (in addition to the inspection tag listed in step 1

10.10.3 Emergency Phone Numbers

The following emergency numbers can be found on the back of MBC's short form Health and Safety Program. (Orientation Booklet)

Emergency Numbers		
Service	**Emergency**	**Non-Emergency**
Police	911	613-236-1222 ext.7300
Ambulance	911	311 / 613-580-4771
Fire	911	311
Water	311	613-580-2424 ext.22300
Gas Leak - Enbridge	1-866-763-5427	
Ontario Spills Action Centre	1-800-268-6060	
Tomlinson Spill Clean-up	613-822-2700	
Ontario Provincial Police (OPP)	1-888-310-1122	
Ministry of Labour, Training and Skills Development 347 Preston Street Ottawa, Ontario, K1S 3J4	1-877-202-0008	613-228-8050
Ontario Poison Control	911	1-800-268-9017
Call Before You Dig		
Ontario One Call Utility	1-800-400-2255	
Hydro Ottawa	613-738-0188 (Power Outage/Emergency) 613-738-6400 (Customer Service)	
Hydro One	1-800-434-1235 (Power Outage/Emergency) 1-888-664-9376 (Customer Service)	
McDonald Brothers Construction Inc.		
MBC Head Office	613-831-6223	
Safety Consultant - James Taylor	613-797-3032	
MBC Emergency Number	613-914-8957	

11 Occupational Health

11.1 Occupational Health Policy

McDonald Brothers Construction Inc. is committed to providing a healthy and safe working environment for all workers through the promotion and maintenance of physical, mental, and wellbeing work practices. We seek to mitigate health related absenteeism by controlling risk. We look to adapt work tasks with consideration to both the workers and work environment. Through education and training we will continue to promote a safe work environment for all our employees and sub-trades.

We at MBC are committed to reducing the risk of occupational illness and disease to the best of our abilities. MBC communicates all occupational health hazards to our workers through proper training, verbal communication, and our health and safety program. We always look to remove or reduce health hazards, and will ensure that workers understand the risks, potential health hazards associated with the work environment, and mitigation processes to protect themselves.

There are four classifications of occupational health hazards:
Chemical agents can be responsible for a number Health conditions. Their toxic properties can harm the body in both the short-term and long-term. They may take form in solids, liquids, vapors, gases, dust, fumes, or mist. They can be inhaled ingested or absorbed into the body.

Health hazards might occur from worker interaction with certain environmental variables. They may cause harm with or without contact. They include mechanical energy which impacts the body. Physical agents generally include but are not limited to ergonomic, environmental, noise, heat, cold, radiation, and vibration hazards.

Biological agents are living things or substances produced by living things that can cause illness or disease in humans. Influenza and COVID19 are examples of biohazards with the potential to affect many workers.

Psychosocial hazards affect someone's social life or psychological health. Examples include occupational burnout, occupational stress, deadline pressure, etc… These hazards are difficult to assess in the workplace and are mostly mitigated through administrative controls

11.2 Roles and Responsibilities

Management

- Take every reasonable precaution in the circumstances for the protection of workers.
- Provide the necessary tools and resources that supervisors and workers require to promote a safe working environment.
- Appoint supervisors who are competent in managing workers involved with the handling and storage of hazardous materials or chemicals.
- Communicate to workers any dangers of the work environment.
- Ensure workers are properly trained for their required tasks.
- Monitor compliance with all safe work practices regarding occupational health.
- Provide all necessary equipment required to reduce occupational illness.

Superintendent/Supervisor/Foreman

- Advise workers of any potential or actual health or safety dangers.
- Select competent workers to handle hazardous materials and chemicals.
- Identify unsafe conditions and utilize the tools and resources available to ensure all workers perform their tasks in a safe manner.
- Provide reference to MBC's Health and Safety Program if workers seek guidance in mitigation methods for health hazards.
- Provide education and communicate health hazards to the workplace through safety/toolbox talks.
- Complete unique job hazard analysis as necessary.

Worker

- Abide by MBC's Health and Safety Program.
- Be aware of your surroundings and the hazards associated with your work.
- Ask your supervisor or refer to safety data sheets if you are unsure about what you are working with and what safety precautions may be required.
- Provide feedback on occupational health policy and procedures

11.3 WHMIS

Workers handling hazardous chemicals must always be aware of the hazards created by such chemicals. MBC will ensure that all workers are trained in WHMIS.
The WHMIS system is broken down into 4 main components:

- Hazard symbols and pictograms
- Warning labels on containers of hazardous material
- Safety Data Sheets (SDS) (formerly known as Material Safety Data Sheets (MSDS)
- Worker education and training

Workers will receive regular recertification as necessary. Furthermore, workers must receive product-specific training – the supervisor is to review the SDS with workers prior to using the product for the first time.

Labels
Labels are required for hazardous materials. These labels may be provided by the supplier or the workplace.

A “Supplier Label” is generally affixed to the container or packaging of the controlled product and includes information such as the product name, the hazard symbol(s) identifying hazards associated with the product, risk phrases, precautionary measures, first aid measures, and reference to an SDS.

A “Workplace Label” is a label placed on the container of decanted material by the manager or worker to identify the contents thereof. The “Workplace Label” must contain such information as the product name, safe handling instructions, and reference to an SDS.

When a supplier label is missing from or becomes illegible on a shipping container or package, a workplace label must be drafted and affixed to it.

Safety Data Sheets (SDS)
An SDS is a document that contains information on the potential hazards (health, fire, reactivity and environmental) and how to work safely with the product. It is an essential starting point for the development of a complete health and safety program. It also contains information on the use, storage, handling, and emergency procedures all related to the hazards of the material. SDSs are prepared by the supplier or manufacturer of the material. In Canada, every material that is controlled by WHMIS must have an accompanying SDS that is specific to each individual product or material.

Information on an SDS:

- Product Information
- Physical Data
- Fire or Explosion Hazard Data
- Reactivity Data and Chemical Instability
- Toxicological Properties Procedures
- Safe Handling
- First Aid Measures
- Preparation
- Hazardous Ingredients Incident

11.4 Stress

MBC is committed to providing as stress-free of a workplace as within our capabilities. Workers mental health will always be a priority within MBC.

There is no single cause of stress in the workplace. Every worker is an individual with their professional and personal lives bringing different factors that may influence their reactions to workplace conditions and the environment. However, there are factors within workplaces that have been shown to influence feelings of stress. Some examples include but are not limited to:

- Uncertain Job Expectations
- Job Security
- Conflict with Coworkers
- Threats to Personal Safety
- Prejudice or Discrimination
- Participation in Workplace
- Lack of Recognition
- Poor Work-Life Balance
- Exposure to Hazards
- Exposure to Conditions
- Lack of Trust
- Workload
- Lack of Training
- Lack of Support

Stress can have an impact on your overall health. Our bodies are designed with a set of automatic responses to deal with stress. Experiencing stress for long periods of time will activate this response system. Low levels of stress that remain constant are just as much a health hazard as high levels of periodic stress. Common effects of stress on the body include:

- Headaches
- Muscle Tension or Pain
- Chest Pains
- Increased Heart Rate
- Weakened Immune System
- Fatigue / Insomnia
- High Blood Sugar
- Stomach Issues

Not only can stress affect your physical health, but your mental health as well. For example, stress may make you feel momentarily (but dangerously) distracted, neglect responsibilities, irritable, withdrawn, or isolated from others, or increase forgetfulness, anxiety, and decrease the ability to clearly think or focus.

Job design is an important factor to workplace stress. If a worker is not properly trained to conduct specific work, that task is not designed for them. Work should be reasonably demanding and challenging to the worker and provide a variety of tasks. Stress might also be caused by a physical agent such as noise, ergonomics, or violence and harassment in the workplace.

It is important to voice your concerns of work-related stress. If you are put into situations that are stressful, communicate with your Superintendent or Health and Safety Coordinator to see what methods of control can be used to minimize the stress.

11.5 Ergonomics and Musculoskeletal Disorders

11.5.1 Ergonomic Hazards

Ergonomic hazards are factors in the environment that can harm the musculoskeletal system. The injuries that are caused by strain placed on the body aren't always immediately obvious, making these hazards difficult to detect. Ergonomic hazards include:

- Improperly adjusted workstations
- Frequent lifting and poor form
- Awkward movements
- Using too much force
- Vibration
- Repetitive motion

Ergonomic hazards are often a result of the way a space is designed, meaning that planning ahead and thinking about how to interact with the workspace is crucial. When these hazards are identified it may be necessary to redesign aspects of the environment or routine, if needed workers should use methods of control to minimize their impact. (PPE, Support Straps, Dollies, etc…). If all preventative action fails, the task should be modified to accommodate shift or rotating work or adjust the pace of work to reduce exertion.

11.5.2 Work-related Musculoskeletal Disorders (WMSD)

Otherwise known as Repetitive Strain Injury (RSI), musculoskeletal disorders are injuries or disorders of the muscles, nerves, tendons, joints, cartilage, and spinal discs. WMSDs are conditions in which the work environment and performance of work contribute significantly to the condition and/or the condition is made worse or persists longer due to work conditions.

Examples of WMSDs include:

- Sprains, strains, and tears
- Back pain
- Carpal tunnel syndrome
- Hernia

WMSDs cause lost productivity, absenteeism, increased use of health care and disability. WMSDs can be more severe than the average non-fatal injury or illness. They are the leading contributor to disability, with lower back pain being the single leading cause. These disorders are often not easily identified and so workers must be informed and trained to identify them.

There are several methods to reduce or minimize risk of WMSDs in the workplace. The first approach is to avoid activities that cause such an injury or to obtain assistance from another worker as to limit the strain per individual. Stretching is beneficial because it promotes circulation and reduces muscle tension, however, people already suffering from WMSDs should consult with a physical therapist before stretching or exercising as they can aggravate an existing condition if not properly implemented. Workers should opt for limiting exposure, when possible, to minimize risk of musculoskeletal disorders.

11.6 Stretching

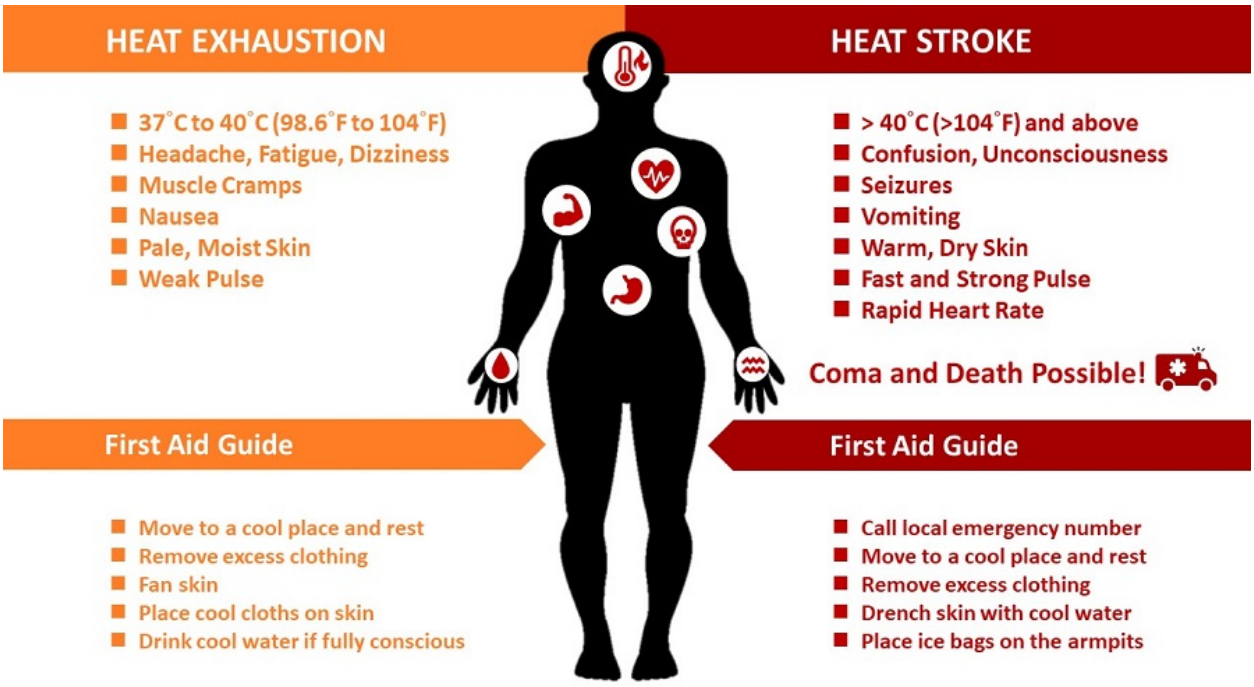
It is recommended that employees take breaks as needed throughout their workday. If possible, it is ideal to stand up and walk for this time and stretch. Below are several stretches that may relieve or reduce strain on the worker's body.

If a worker has an existing condition and has a recommendation from a qualified physician or physical therapist, they should stick to the recommended plan as stretching may agitate specific WMSDs.

11.7 Heat/Cold Stress

11.7.1 Heat Stress

In a very hot environment, the most serious health and safety concern is heat stroke. Heat stroke can be fatal if medical attention is not available immediately. Heat exhaustion and fainting are also types of heat related illnesses which are not fatal but can interfere with a person's ability to work. Oftentimes victims of heat stroke are unable to notice the symptoms when they are happening, and so there is a greater importance on co-worker's ability to identify symptoms in others and to get medical help.



While there is no legislated maximum temperature to which workers can be exposed, MBC advises all supervisors and superintendents consider workers when exposed to elevated heat conditions. High heat conditions are more than just temperature. Occupational exposure limits are determined by humidity, temperature, exposure to sun, air movement, work demands, and clothing.

In the event the heat conditions of the workplace are unbearable and work difficult to conduct, management may direct controls such as a site shutdown, extra break times, or modified task schedules.

Workers can reduce their exposure to such a hazard by doing the following:

- Use fans or air conditioning
- Wearing light, loose-fitting clothing
- Taking more frequent rest breaks
- Drinking cool water (NOT ice-cold)
- Conducting less physically demanding activities
- Create shade or limit exposure
- Sunscreen to reduce sunburn
- Remove unnecessary clothing
- Alternatively, cover up with a long sleeve
- Use a buddy system for symptom identification

11.7.2 Cold Stress

At very cold temperatures, the most serious concern is the risk of hypothermia, dangerous overcooling of the body, or frostbite. Working in cold conditions is a very serious matter as it can lead to permanent disability, or death.

Hypothermia is the most serious cold injury; warning signs consist of nausea, fatigue, dizziness, irritability, or euphoria. Symptoms often include vigorous shivering, decreased physical function, lack of coordination or speech, stiffness, and no pulse. Freezing injuries like frostbite are also urgent. Signs of frostbite include skin looking waxy and feeling colder than the area around it, blood circulation may stop in the affected tissue. Symptoms include inflammation of the skin in patches accompanied by pain, and in severe cases, there could be tissue damage without pain or burning and prickling sensations resulting in blisters. Frostbitten skin is highly susceptible to infection, and gangrene may develop.

Like with heat stress, when workers are in cold conditions MBC advises that supervisors and Superintendents take extra measures to keep workers under their care safe. Allow workers to take frequent and regular breaks to warm up. If conditions are unbearable, or making work difficult to conduct, management may direct a site shutdown to protect workers.

General recommendations to prevent cold stress include:

- Dress in layers of warm clothing, with a wind-resistant outer layer
- Cover all exposed skin
- Wear a hat, mittens, or insulated gloves
- Wear waterproof footwear
- Stay dry
- Keep active
- Maintain a work/break schedule
- Take breaks in warm areas

In the event symptoms become overbearing or you are made aware that you are succumbing to hypothermia or frostbite, call emergency services immediately and notify or advise your supervisor.

11.8 Noise

Construction sites can have very hazardous noise levels. Noises from construction sites are varied and always changing depending on the activities taking place. 85dBA and higher is considered hazardous to one's health, and the range of noise level of a construction site is between 81 – 113dBA.

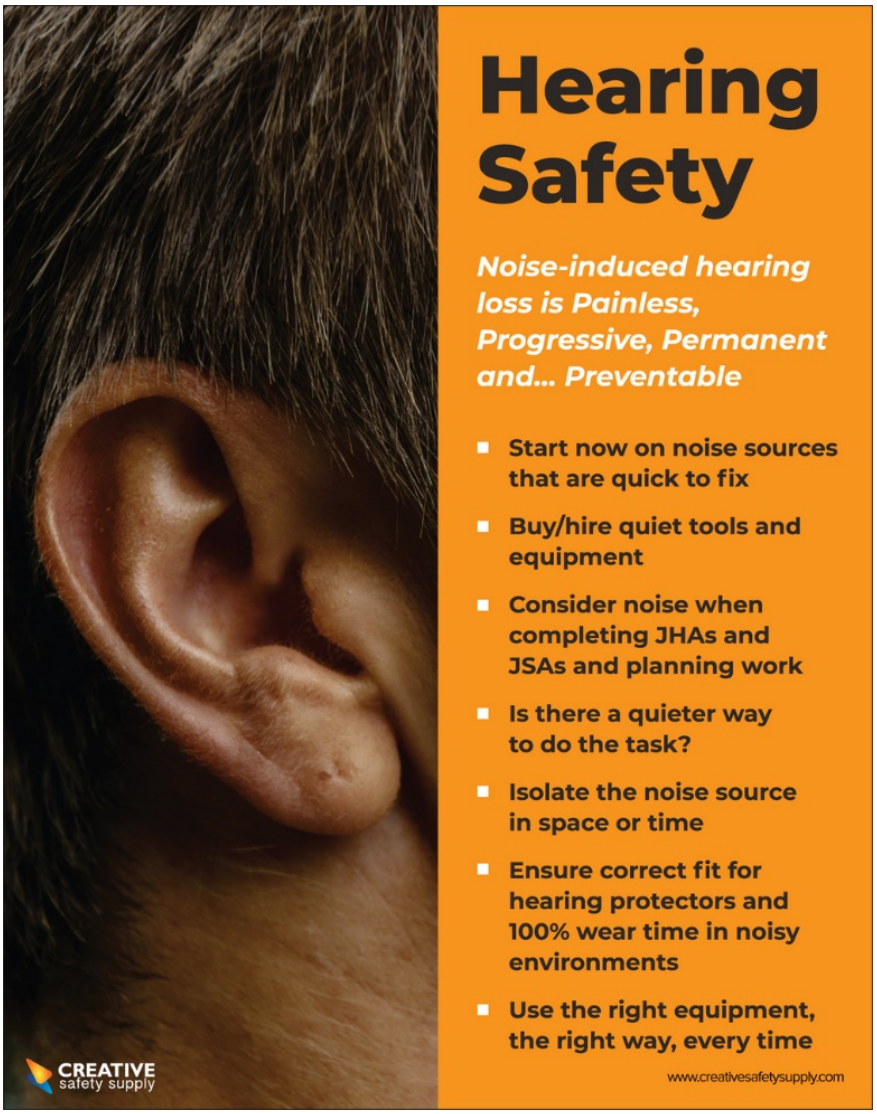
Loud noises can temporarily or permanently affect hearing. Hearing loss is usually gradual, and protection must be used to prevent this. Elevated noise might cause a chronic condition in the worker like hearing loss or tinnitus, the ringing of the ear. If a worker is exposed to a >85dBA workplace they should use hearing protection devices. Generally, controlling the noise at the source is the best way to mitigate noise damage.

Workers may be able to erect barriers to reduce the impact of noise in the workplace or wear appropriate PPE. Employers may use an audiometer to determine if the workplace noise level is safe for workers to conduct work. One time exposure is not as much of a hazard as constant exposure.

The effects of noise on hearing depend on:

- Noise intensity
- Sound pressure
- Frequency
- Pitch
- Exposure time
- Distance from source
- Individual susceptibility
- Age
- Other factors (disease, genetics, etc…)

Keep in mind the indirect effects of excessive noise such as work-related stress, cardiovascular pressure, distraction, and irritation. The major difficulty with noise and protection against it is that workers still need to communicate with each other. Therefore, workers should test themselves on hand signals, and regularly fit hearing protective devices as studies have shown repeated use of hearing protection improves workers ability to discern information without hearing to their full potential.



11.9 Vibration

Vibration is the mechanical oscillations of an object about an equilibrium point. The oscillations may be regular such as the motion of a pendulum or random such as the movement of a tire on gravel road. Vibration enters the body from the part of the body or organ in contact with the source. The risk of vibration induced injury depends on the average daily exposure. The risk evaluation of vibration considers the intensity and frequency of the vibration, the duration of exposure and the part of the body which receives the vibration energy.

Vibration induced health conditions progress slowly. They usually begin as pain and overtime may develop into an injury or disease. Vibration can cause changes in tendons, muscles, bones, nerves, and joints. Collectively, these effects are known as Hand-Arm Vibration Syndrome (HAVS).
Workers affected by HAVS commonly report:

- White fingers when exposed to cold
- Loss of light touch
- Tingling and loss of sensation in fingers
- Pain
- Loss of grip strength
- Bone cysts in fingers and wrists

Whole-body vibration can cause fatigue, stomach problems, headache, loss of balance, and shakiness shortly after or during exposure. After daily exposure over several years, whole-body vibration can affect the entire body and result in several health disorders.

The three most important factors that influence the seriousness of health effects:

- The threshold value or the amount of vibration exposure that results in no adverse health effects.
- The dose-response relationship. (How the severity of the ill health effects is related to the amount of exposure)
- Latent period. (Time from first exposure to appearance of symptoms)

MBC advises workers to use vibration-absorbing materials and the appropriate PPE when working with high vibration tools. Some tools are built to be anti-vibration and reduce acceleration levels by a factor of about 10. Gloves can help reduce the threshold value, however, while they reduce the hazard, they have a limited effectiveness.

Along with gloves and tools, workers can reduce the risk of HAVS by the following:

- Use a minimum strength hand grip that still allows the safe operation of the tool or process.
- Keeping warm.

- Avoid continuous exposure by taking rest periods.
- Rest the tool on the work piece whenever practical.
- Do not use faulty tools.
- Maintain tools properly. Tools that are worn, blunt, or out of alignment will vibrate more.
- Mechanically isolate the source of vibration to reduce exposure.

Discuss vibration in a toolbox talk, if you are noticing symptoms of HAVS, consult your doctor.

11.10 Infectious Control Measures

McDonald Brothers Construction Inc. is committed to ensure the protection of the public and workers accessing our work sites and office environment. All those accessing our sites are asked to follow the advice of the Public Health Authorities and the preventative measures outlined in this policy.

11.10.1.1 On-Site Protection

The Public Health Agency of Canada recommends adopting basic respiratory hygiene measures applicable to the prevention of seasonal infectious diseases like influenza and the common cold.

Recommended hygiene measures include:

- Wash your hands often with soap and water for at least 20 seconds.
- Avoid touching your face with unwashed hands.
- When coughing or sneezing, use a tissue or the bend of your arm. NOT your hands.
- Avoid hugs and handshakes.
- Use gloves where practical for work activities.
- While indoors, wear a mask.
- When working near other workers wear eye protection.
- Avoid sharing tools.

11.10.1.2 Cleaning

Clean all “high-touch” surfaces such as doorway entrances, elevator buttons, keyboards, and phones as needed or on a regular basis. The frequency of cleaning each work area and surface depends on the number of people who use it, the duration of use, and the presence of any objects which people might handle with their bare hands.

Gloves can help protect you when they are worn. Removing and then putting them back on can cause cross-contamination. Think about cleaning, storing, and replacing your gloves.

MBC will where practical, ensure that running water wash stations and soap are available on each Construction Project in conjunction with a supply of disinfectants and hand sanitizers for general use. MBC will also, subject to availability, provide PPE such as gloves and masks. Please consult with management to coordinate site specific requirements.

11.11 Hazardous Gases

There are dangerous gases that may be present on a construction project. MBC is committed to ensuring that these hazardous gases are detected and monitored for the safety of workers on our projects. Different gases have different prescribed requirements in legislation. All testing devices used by MBC shall be properly calibrated and have alarms set for dangerous levels of exposure to any hazardous gases.

11.11.1 Carbon Monoxide (CO)

Carbon monoxide is an odorless, colorless gas that can cause sudden illness and death. The primary route of exposure is inhalation. Symptoms of monoxide poisoning may include headache, nausea, dizziness, drowsiness, confusion, or permanent damage to organs including the brain and heart. Contrary to popular belief, CO is not heavier than air, it is just slightly lighter, which means that CO gas does not sink to the floor but is mixed in with the air around it. In an emergency that involves over-exposure to CO, evacuate the area immediately and isolate the hazard area, keeping out unnecessary and unprotected personnel; then use PPE while removing sources of ignition and creating ventilation.

11.11.2 Hydrogen Sulfide (H2S)

Hydrogen sulfide is a colorless gas known for its pungent “rotten egg” odor at low concentrations, it is extremely flammable and highly toxic. Oftentimes, H2S will not be encountered in regular construction activities, however, it does occur naturally in sewers and well water. H2S is heavier than air so it can collect in low-lying and enclosed spaces like manholes. Any work taking place in underground confined spaces must have H2S testing done prior to work. Symptoms of H2S poisoning range from mild headaches or eye irritation to unconsciousness or death.

11.11.3 Explosive Gases (EX) and Oxygen (O2)

EX refers to several explosive or combustible gases, vapours, and substances that may be airborne. Each substance has a unique acceptable LEL% (Lower Explosive Limit). Examples of EX include propane, methane, saw dust, etc…

Oxygen is not often thought of as a hazard but is required to be tested when working in confined spaces or deep trenches/excavations. Oxygen deficient work areas will require workers to use air supplying respirators. Oxygen abundant areas are also dangerous, because with a surplus of oxygen comes an increased fire hazard. Exceeding 25% oxygen may even lead to spontaneous combustion of items like clothing or rope.

11.11.4 Monitoring and Testing

MBC uses various gas detecting instruments to monitor levels of atmospheric content on our projects. If a project is known to have an atmospheric gas present, MBC will supply the project with the appropriate and necessary testing or monitoring device. Each device will be calibrated and have the alarms set to exposure limits and prescribed levels prior to being delivered to a project.

For projects using temporary gas heaters inside buildings or structures, this will require a CO monitoring device located on the same floor/level and located within a reasonable distance of the heater. In addition to monitoring, temporary gas heaters will also have an exhaust system leading outside the building, this exhaust system will not exceed 2 lengths of tubing.

Currently, MBC uses 2 different types of gas monitors.

- CO Monitor/Detector
- Multifunction Gas Monitor (or Multi-gas Monitor)

Multifunction gas monitors will be required when work is taking place or preparing to take place in confined spaces, or where there are explosive/combustible airborne substances.

Below find the detectable gases exposure limits.

TWA = Time Weighted Average (Average exposure for an 8-hour period)

STEL = Short-Term Exposure Limit (Average exposure for a 15-minute period)

Ppm = Parts Per Million (1 of 1,000,000 concentration level)

Detectable Gas	**Safe Exposure Range**	**Hazardous Level 1 (L Alarm)**	**Hazardous Level 2 (H Alarm)**
Oxygen (O2)	19.5% - 23%	=<19.5%	=>23%
Carbon Monoxide (CO)	0ppm – 25ppm	25ppm (TWA)	75ppm (30 Mins) 100ppm (STEL)
Hydrogen Sulfide (H2S)	0 – 10ppm	10ppm (TWA)	15ppm (STEL)
EX Gases (EX)	0% - 3% LEL	=>5% LEL	=>25% LEL

Upon hearing the L Alarm (at Hazardous Level 1), the work task should cease until controls have been provided to reduce the hazard

12 Statistics, Records & Documentation

12.1 Statistics, Records & Documentation Policy

Maintaining health and safety statistics is a major component of a strong health and safety system. Many policies, procedures, notices, statements, and reports are necessary to fulfill legal and health and safety program requirements. MBC will maintain statistics, records and documentation relating to health and safety so management may use them to:

- Monitor and evaluate the health and safety performance of the company.
- Review trends and take corrective actions.
- Monitor and evaluate effectiveness of corrective actions.
- Retain important information and documents.

The following items will be reviewed:

- Injury/Illness Causes & Root Causes
- Safety Audits/Inspections
- Observed Hazard Reports/Near Misses
- Work Refusal Reports
- JHSC Recommendations
- First Aid Treatment Records
- Orientation & Training Records
- Disciplinary Actions
- Management Review Objectives
- Violence and Harassment Records
- Hazard Assessments
- Testing Records (Noise, Air, Light, etc…)

Each year a summary report of health and safety performance will be created by management (Health and Safety Performance Report). This report will examine statistics as they relate to incidents, safety audits, communications, hazard assessments, etc... This report will also take into consideration details of various documentation.

All quantitative measurements will be taken with properly maintained and calibrated equipment

12.2 Roles and Responsibilities

Management

- Monitor all health and safety activities and performance, creating reports as required.
- Review and track activity and submitted documents on SiteDocs.
- Use acquired insight and information from all health and safety reports to direct changes that will improve the occupational health and safety management system.
- Ensure a proper system is in place for the maintenance and recordkeeping of health and safety documentation.
- Review drafted safety documentation prior to implementation.

Health & Safety Coordinator

- Monitor worker compliance regarding scheduled or procedural paperwork.
- Ensure all received documentation is recorded, stored, tracked, and made available for the creation of company safety statistics and management review.
- Create annual Health and Safety Performance Reports examining the months and year for management to review.
- Regularly examine documentation effectiveness to ensure they maintain relevance in the current Health and Safety Program.
- Ensure all relevant safety documentation and records are made available and accessible to workplace parties.

Superintendent/Supervisor/Foreman

- Complete and participate in all required safety documentation.
- Ensure workers under their care participate in the completion of safety documentation and sign all required forms.
- Submit all safety documentation to management and health & safety personnel as needed.
- Confirm all on-hand forms are up-to-date and that completed forms are legible and appropriate.
- Maintain all site-specific hazard assessment forms on-site and make them available to all workers, ensure they are submitted to management within a reasonable timeframe.

Health & Safety Representative

- Complete and participate in all fulfilling required safety documentation.
- Keep records, hazard assessments, and all relevant safety documentation organized and in a centralized location on Construction Project and/or within SiteDocs.
- Submit all safety documentation to management and Health & Safety Coordinator as needed.

Worker

- Participate in all safety related meetings and complete all paperwork as required.
- Complete all required documentation as dictated by the Health and Safety Program promptly and correctly. Send the documents to appropriate personnel.

12.3 Procedures and Processes

12.3.1 Trend Identification

MBC Health and Safety Coordinator will collect the data required to develop a trend report. This trend report will be incorporated into the Health and Safety Performance Report which is discussed at the annual safety meeting and management review.

To identify trends, statistics, and performance, OHS procedures will be tracked using all available reports and documentation. When a noticeable increase in incidents or specific data occurs over multiple months, it is to be noted as a trend. When a trend has been identified act as soon as possible using OHS promotion and awareness measures, speak with workers, or review policy and procedure.

MBC will also examine leading and lagging performance measures when conducting trend reports. Monthly data and response times from management regarding documentation will be considered to properly evaluate the proactive/reactive capacity of the company.

12.3.2 Project Trend Reports

There will be instances where trends may be unique to a specific project. In this instance, management may direct the Health and Safety Coordinator to conduct a trend report that examines the hazards and their trend status unique to that project. This trend report will be reviewed with the Superintendent and the respective Project Manager. This may be done in the presence of the JHSC or Health and Safety Rep. Trends should be identified and an action plan should be established and implemented.

12.3.3 Health and Safety Performance Report

The Health and Safety Performance Report is a summary of annual and month-to-month OHS statistics and a comparison of performance between the current and previous years. Procedure is as follows:

1. All reporting paperwork must be completed and documented appropriately and kept for the required length of time.
2. The Health and Safety Coordinator shall monitor all documentation and records to ensure they are completed thoroughly and accurately.
3. All original documentation will be filed electronically and/or in paper files for record-keeping purposes.
4. Health and Safety Coordinator is to compile reports using the collected data. See *12.00 – Statistics & Records Policy* for reporting sources.
5. Reports are to be sent to senior management for review.
6. During annual review with management, records and statistics will be measured against MBC's safety objectives and past performances, as well as all relevant industry reports if possible.
7. Health and Safety Coordinator and management will devise an OHS promotion plan or action plan for any identified trends or substandard statistics.

The Health and Safety Performance Report will be a topic of conversation during the semi-annual safety meetings and recorded statistics and performance measurements will be displayed and discussed for transparency and the benefit of the workforce.

12.4 Recordkeeping Requirements

McDonald Brothers Construction Inc. recognizes the importance of the proper maintenance and recordkeeping of health and safety-specific documentation and statistics. MBC has specific recordkeeping standards that must be met to ensure that all documentation is being used appropriately and is relevant for all matters of health and safety.

12.4.1 Recordkeeping Practices

MBC Management will review, update, or withdraw documents as necessary. This includes all forms, procedures, policies, and checklists. Any documents that may be considered obsolete but present in the current Health and Safety Program should be included in the review. These obsolete documents will be archived but no longer made accessible for editing or completion. Once a document has been archived for 3 years, management may choose to remove the document from existence.

All recordkeeping practices outlined throughout the health and safety program will be maintained for a **minimum** of 3 years, unless otherwise stated elsewhere within this policy.

Prior to the issue of any additional documentation, form, policy, or procedure, a draft shall be sent to management for approval. Once approved, the new content shall be implemented into MBC's health and safety program.

Each document must be updated, and revisions tracked on a regular basis. Management will maintain a "Revision Log" to track all health and safety related documentation improvement, revision, or withdrawal. Each updated document/form must identify the revision date and the version number.

All documentation must be labelled and accessible. In the event a key document does not meet this requirement, contact management and they will have the appropriate party re-distribute the same document - edited or produce a new one. All safety documentation will be made accessible to appropriate parties digitally, but in some circumstances a physical copy may be required.

13 Legislation

13.1 Legislation Policy

McDonald Brothers Construction Inc. is committed to ensuring that all required legislation is posted and available on each jobsite and is accessible to all personnel. MBC will also, to the best of our ability, remain up to date on all new legislative requirements. This could be done using the WSPS Legislation Tracker and manual observation. MBC is committed to being compliant with all applicable health and safety legislation and regulations.

McDonald Brothers Construction is committed to being compliant with all applicable health and safety legislation as it relates to its activities. To comply, MBC is committed to posting all relevant and required legislation at each Workplace. MBC Management will communicate any updates to legislation to all workers as updates are released.

MBC will monitor new legislation either by actively searching, participating in health and safety seminars or through the IHSA for Construction Projects and/or Workplace Safety and Prevention Services Legislation Tracker for the Office.

13.2Roles and Responsibilities

Management

- Promote, encourage, and enforce within the company compliance with all legislation and regulations pertaining to the company's scope of work.
- Abide by OHSA's reporting procedures.
- Ensure appropriate workplace parties are posting all required legislation on-site.
- Regularly review active legislation to identify updated, removed, or new regulations.
- Reflect changes to legislation in MBC's health and safety program.

Health and Safety Coordinator

- Take charge in the review of applicable health and safety legislation.
- Enact all management approved changes to the health and safety program and make appropriate recommendations to implement such changes to the workplace.
- Conduct safety surveys and audits to monitor compliance of applicable legislation.

Superintendent/Supervisor/Foreman

- Comply with all relevant and applicable legislation.
- Post all required legislated materials in a conspicuous place easily accessible by workers.
- Promote and encourage compliance among workers with all applicable legislation and regulations.
- Consult with MBC Health and Safety Coordinator and representatives to identify gaps in compliance and posted requirements with legislation.

Worker

- Comply with all relevant and applicable legislation.
- Know the location of posted legislation in the workplace.

13.3 Posting Requirements

#	ITEM	MBC OFFICE	MBC JOBSITE	DATE OF ISSUE
1	Occupational Health and Safety Act	Safety Board	Safety board	Current
2	Industrial Regulations	Safety Board	N/A	Current
3	Regulation 1101: First Aid Requirements	Safety Board	Safety Board	Current
4	MBC Health and Safety Program	Safety Board	Safety Board	Current
5	Fall Arrest: Rescue Procedures	N/A	SSSP/Site Office	N/A
6	Emergency Response Plan	Safety Board	SSSP/Site Office	Current
7	Emergency Phone Numbers & Location of Nearest Hospital	Safety Board	SSSP/Site Office	N/A
8	Name of Constructor & Head Office Info	N/A	Safety Board	N/A
9	Address and Phone Number of Ministry of Labour, Training and Skills Development Office	N/A	Safety Board	N/A
10	Name, Trade, and Employer of Each JHSC Member or the HSR	Safety Board	Safety Board	Current
11	WSIB's In Case of Injury Poster	By First Aid Kit	Safety Board	N/A
12	MTLSD Prevention Starts Here Poster	Safety Board	Safety Board	N/A
13	WHMIS Poster	Shop	Safety Board	Current
14	Safety Data Sheet (SDS) Binder	Shop	Safety Board	Last 3 Years
15	MTLSD Notice of Project	N/A	Safety Board	N/A
16	Form 1000: Registration of Constructors and Employers Engaged in Construction	N/A	Site Office/Safety Board	N/A
17	MTLSD Inspector's Orders and Reports	Safety Board	Safety Board	N/A
18	DANGER Signs in Hazardous Areas	Various Locations	Various Locations	N/A
19	Location of Toilets & Clean Up Facilities	N/A	SSSP/Safety Board	N/A
20	Valid First Aider(s) on Duty	Safety Board	Safety Board	Current
21	Inspection Card for First Aid Box	By First Aid Kit	By First Aid Kit	N/A
22	Record of First Aid Treatment Given	Safety Board	First Aid Kit	N/A

23	Incident Investigation Reports	Safety Board	Site Office	N/A
24	Designated Substance Report/Survey (If required)	N/A	Safety Board	Current
25	Site Specific Safety Plan	N/A	Safety Board	Current
26	Traffic Protection Plan (if required)	N/A	SSSP/Site Office	Current
27	MBC Health and Safety Policy Statement	Safety Board	Safety Board	Current
28	MBC Violence and Harassment Policy Statement	Safety Board	Safety Board	Current

If any of these items are not posted or in accessible inventory, contact MBC Management and notify them of the missing content.

13.4 Applicable Legislation in MBC Workplaces

There are many different pieces of legislation that govern the Workplace. Regulatory requirements are in place to mitigate injuries and protect the lives of workers and must always be followed. As appropriate, MBC may impose more stringent requirements and procedures than identified in legislation to further increase the protection of our Employees and Workers. Below is the list of the most relevant legislation pertaining to MBC's Workplaces:

13.4.1 MBC Construction Project

- *Occupational Health and Safety Act (R.S.O. 1990)*
- *Occupational Health and Safety Awareness and Training (Reg. 297/13)*
- *Construction Projects (Reg. 213/91)*
- *Workplace Hazardous Materials Information System (Reg. 860)*
- *First Aid Requirements (Reg. 1101)*
- *Notices and Reports Under Sections 51 to 53.1 of the Act (Reg. 420/21)*
- *Noise (Reg. 381/15)*
- *Designated Substances (Reg. 490/09)*
- *Asbestos on Construction Projects (Reg. 278/05)*
- *Control of Exposure to Biological or Chemical Agents (Reg. 833)*
- *Return to Work and Re-Employment – Construction Industry (Reg. 35/08)*
- *Workplace Safety and Insurance Act (S.O. 1997)*
- *Fire Code (Reg. 213/07)*
- *Electricity Act (S.O. 1998)*
- *Confined Spaces (Reg. 632/05)*
- *Employment Standards Act (S.O. 2000)*
- *BOSTA Act (S.O. 2021)*

13.4.2 MBC Workplace – Head Office

- *Occupational Health and Safety Act (R.S.O. 1990)*
- *Industrial Establishments (Reg. 851)*
- *First Aid Requirements (Reg. 1101)*
- *Workplace Safety and Insurance Act (S.O. 1997)*
- *Employment Standards Act (S.O. 2000)*
- *Fire Code (Reg. 213/07)*
- *Workplace Hazardous Materials Information System (Reg. 860)*

Non-compliance with any applicable legislation to the workplace will result in disciplinary action by the proper authorities from external parties or from within the company. MBC promotes compliance with legislation by this comprehensive health and safety program and open communication between all workplace parties. Levels of compliance within the company will be evaluated at each Management Review and will be discussed during the OHS Performance Review.

13.4.3 Safety Board Reference

It should be noted that this is a visual illustration of what a safety board in the workplace **may** look like. Ensure all legislated posting requirements are being always met, if you are unsure of what is required to be made available on the safety board, contact your Health and Safety Coordinator.

14 Management Review

14.1 Management Review Policy

McDonald Brothers Construction Inc. is committed to reviewing the company's overall health and safety performance. The intent of the review process is to ensure the continual improvement of our health and safety program and to allow improvements within the workplace health and safety culture. This will be accomplished by conducting a formal and documented evaluation of health and safety performance, company policies, procedures, and the effectiveness of the Health and Safety Program.

Once a year, management will review the performance, records, and statistical data regarding workplace incidents, policy compliance, recurring deficiencies, and other relevant indicators to identify and assess trends regarding health and safety in the workplace. Identifying trends will assist in promoting the right content and material to improve the MBC Health and Safety Program.

Each review will begin with an analysis of the previous review's objectives and goals and concluded with the new safety objectives and goals established for the oncoming 12-month period. This will be communicated to appropriate personnel.

14.2 Roles and Responsibilities

Management

- Direct and participate in the Occupational Health and Safety Management System (OHSMS) Review process.
- Provide necessary resources for the collection and processing of health and safety information.
- Establish an action plan to improve the company's Health and Safety Program's performance based on information learned during the review and provide necessary resources for its implementation.
- Communicate action plan and new safety objectives to all personnel.

Health and Safety Coordinator

- Manage the collection, processing, and storage of health and safety data for use in the review process.
- Create a summary report of the company's health and safety performance.

- Using trend identification, identify areas of improvement in the company's Health and Safety Program performance and include them in the report.
- Track changes to legislation and include the changes in the management review meeting.
- Following the annual review, draft an action plan with approval and/or input from management.
- Direct the implementation of the finalized action plan, including communication of the plan to all relevant personnel.

Superintendent/Supervisor/Foreman

- Ensure all required safety documentation is completed, collected, and forwarded to the Health and Safety Department as required by the Health and Safety Program.
- Participate in the review as required by management.
- Communicate the action plan to workers under their care.
- Implement changes as directed by the action plan and management.
- Ensure workers under their care are working in compliance with changes directed by the action plan and all applicable legislation.

Worker

- Work in compliance of the Health and Safety Program and abide by all safety directives.
- Participate in the review as required by management.
- Comply with all additions or revisions to the company safety program created in the review process.
- Make every best effort to attend the annual company winter and summer safety meetings.

14.3Review Procedures

The health and safety performance report will be written before the annual review. This report will examine all components identified in S.*12 – Statistics & Records Policy* and identify workplace trends that concern MBC's health and safety culture. Upon completion of this report, it will be used as the basis for the management review discussion.

The Occupational Health and Safety Management System Review procedure requires management to assess the following in addition to the Health and Safety Performance report:

- ☐ S1 – Health and Safety Program and Policy
  - Policy Statement, Responsibilities
- ☐ S2 – Hazard Assessment, Analysis, and Control

- Policy, Responsibilities, Assessment Procedure, Critical Tasks, Control Selection, Control Evaluation, Worker Compliance

☐ S3 – Company Rules
- Policy, Violence & Harassment Procedures and Responsibilities, Drug and Alcohol Policy, RTW Responsibilities, RTW Procedures, Subcontractor Management, Disciplinary Policy and Procedure, Worker Compliance

☐ S4 – JHSC and HSR
- Policy, Election/Membership Process, Recommendation Procedure

☐ S5 – Personal Protective Equipment
- Policy, Responsibilities, Inspection Procedures, Selection Guide, PPE Training, Worker Compliance

☐ S6 – Preventative Maintenance
- Policy, Responsibilities, Inspection Procedures, Inventory Control, Worker Compliance

☐ S7 – Training and Communication
- Policy, Responsibilities, Orientations, Training, Safety Meetings and Communications, Certificate Recordkeeping

☐ S8 – Workplace Inspections
- Policy, Responsibilities, Inspections in the Workplace, Inspection Procedures

☐ S9 – Investigations and Reporting
- Policy, Responsibilities, Reporting Procedures, Investigation Procedures, Communications, *OHSA* Reporting Legislation, Worker Compliance

☐ S10 – Emergency Preparedness
- Policy, Responsibilities, First Aid Procedures, First Aid Kits, Emergency Equipment, Evacuation/Lockdown Procedures, Evacuation/Fire Drills, Fall Rescue Plans and Procedures, Fire Orders, Fire Extinguisher Inspections, Worker Compliance

☐ S11 – Occupational Health
- Policy, Responsibilities, All Occupational Health Practices, Worker Compliance

☐ S12 – Statistics and Records
- Policy, Trend Identification/Reports, Health and Safety Performance Report Procedure, Review Items, Recordkeeping

☐ S13 – Legislation
- Policy, Applicable Legislation, Posting Requirements, Supervisor Compliance, Changes in Legislation

☐ S14 – Management Review
- Policy, Objectives Performance, External Feedback, Action Plans, Annual Stats vs Previous Year/6-month period, Objectives/Action Plan Communication

- ☐ S15 – Safe Work Practices
  - Policy, Existing SWPs, Communication of SWPs, Additional SWPs, Worker Compliance
- ☐ S16 – Safe Job Procedures
  - Policy, Existing SJPs, Communication of SJPs, Additional SJPs, Worker Compliance, Advanced Procedures
- ☐ Appendix A – All Forms
- ☐ Appendix B – Resources
- ☐ Appendix C – Training Validity Reference Guide
- ☐ Definitions, Terms, and Abbreviations

Using the information assessed during the review, management will identify areas for improvement in health and safety at MBC. Annual safety objectives and action plan will be established to facilitate improvement in the effectiveness of MBC's health and safety program. This continuous improvement plan will create measurable goals for each area identified for improvement. Each review action plan is to have a timeline goal of 1 year at minimum.

The action plan and new safety objectives will be communicated to workers at the annual safety meeting(s) where the health and safety performance report is presented, on site during safety talks, by email, or other communication methods.

All records from management review will be retained for a period of at least 3 years.

The Occupational Health and Safety Management System Review may result in significant changes to policies and procedures, therefore it is important to mark revisions to any of the Health and Safety Program or forms using the program revision log.