



J.J. MCGUIRE GENERAL CONTRACTORS INC.

CORPORATE HEALTH & SAFETY

POLICY AND PROGRAM

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1.0 HEALTH AND SAFETY POLICY STATEMENTS:

Policy Statements are utilized to communicate the health and safety principles, philosophies and requirements from which the company manages its business activities.

Our Corporate Policy requires every person in the organization to take ownership for the wellbeing of each individual in our employ and in our workplaces. This commitment is described within each policy and is endorsed through Senior Management by signing each of the Corporate Health and Safety Policy Statements.

1.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Obtain a current and signed copy of each corporate policy statement at the beginning of each calendar year.
- Distribute current and signed copy of each corporate policy statement to each Project Manager and Supervisor at the beginning of each project.
- The Corporate Policy Statement shall be reviewed with each new worker at their company orientation meeting.

Senior Management Responsibilities:

- Review policy on an annual basis with the Health and Safety Coordinator and sign, date and implement the policy as required.
- Ensure the policy statement reflects the organizations commitment and that the policy statement meets the requirements of all applicable legislation requirements by third party auditors.
- Review the policy and include the updated copy within each annual Health and Safety Program.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Provide current and signed copies of the corporate policy statements to all Supervisors.
- Ensure implementation of the policies at all office and site locations.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Ensure the workplace follow the guiding principles outlined within the corporate policy statements.
 - Ensure current and signed copies of the corporate policy statements are available in locations accessible to all work parties on sites.
 - Ensure implementation of the policies at all office and site locations.
-

- Ensure the workplace follow the guiding principles outlined within the corporate policy statements.
- Ensure current and signed copies of the corporate policy statements are available in high traffic areas accessible to all work parties.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.

Workers Responsibilities:

- Follow the guiding principles outlined within the corporate policy statements.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Work in compliance with the provisions of Occupational Health and Safety Act and Regulations.
- Report to his or her Supervisor the absence of or defect in any equipment or protective device of which the worker is aware.

1.2 PROCEDURE

Policy Statements as a minimum address the following criteria:

- the basic objectives or intent of the policy
- the general responsibilities of Workers, Subtrades, visitor's and suppliers
- acknowledgement that legislative standards are the minimum requirements
- intolerance for non-compliance with policies

Policy statements must be regarded by all associated with the business activities of the company as minimum acceptable standards or and included in all company provided Safe Work Practice package.

The following Policy Statements will be implemented:

- Safety Takes Priority
- Companywide Memorandum
- Violence Policy
- Harassment Policy

Policy statements are reviewed through a meeting process and issued by Senior Management in conjunction with the Health and Safety Coordinator on an annual basis. All Corporate Policy Statements must be signed and dated by a Senior Manager of the company.

J.J. MCGUIRE GENERAL CONTRACTORS INC.

Health & Safety Policy Statement

SAFETY TAKES PRIORITY

Over the past several years, the construction industry has experienced a period of rapidly changing technologies and regulations.

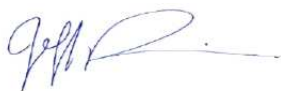
J.J. MCGUIRE GENERAL CONTRACTORS INC. Senior Management's responsibility to achieve and maintain a safe and healthy working environment as a right for all workers on our work sites. This responsibility is of the highest priority and every reasonable precaution shall be taken to provide such an environment.

The prevention of incidents and the provision of safe and healthy working conditions is the responsibility of all senior management, supervisors, and workers of J.J. MCGUIRE GENERAL CONTRACTORS INC. and affiliates. Workers at every level are responsible and accountable to protect themselves, co-workers and other people in the work environment and support the Joint Health & Safety Committees in pursuing health and safety excellence.

All supervisors on our sites, whether working directly or sub-contractually for J.J. MCGUIRE GENERAL CONTRACTORS INC. are expected to perform their duties and responsibilities in a manner which ensures that workers under their authority have the knowledge, training or experience to perform their job tasks in the safest manner possible. All supervisors must ensure their workers are familiar with the *actual* and *potential* hazards of the job and with an understanding of the safety standards and regulations that apply to their work.

We require that every person affiliated in any way on our work sites, to abide to our Corporate Health and Safety Policy and Procedures Manual, and to adhere to Ontario's Occupational Health and Safety Act and its Regulations for Construction Projects. We also understand that the responsibilities for workplace health and safety must extend to all workplace parties (senior management, front line management and workers) on or off the job. Severe penalties could be exercised against employers and employees, by our provincial government for contravention to the statutes. We strive to continually improve and in the spirit of consultation and co-operation with all workers, hope to achieve the highest standard of health & safety in the workplace.

Yours truly,



Jeff Robinson,
President
January 3, 2018

J.J. MCGUIRE GENERAL CONTRACTORS INC.

COMPANY WIDE MEMORANDUM

To: All Employees

From: Mitch Newbold - Vice President Operations

Subject: Health & Safety - "A Game Plan Approach"

Safety is the responsibility of every employee, no matter what their title or position. Our livelihood is dependent on our attitude towards safety and to ignore safety is to jeopardize, not only our own future wellbeing, but that of our families, our fellow employees, and yes, even that of the company itself. We believe safety is something we must work at and in order to better organize ourselves for the tasks involved, we have prepared this safety program or as we prefer to call it, - "our game play strategy book" - to encourage a team approach in every aspect of safety consciousness.

I remind everyone that we are all subject to the compliance requirements of the Ontario Occupational Health and Safety Act and its regulations. This safety policy and program manual is intended to complement and enhance the requirements to the relevant safety acts and regulations; not to replace them.

The key to a safety and healthy work environment, is the total participation by all members of our work force, in our "game plan" which outlines in the clearest possible manner the requirements and obligations of each employee, and the commitment of the employer to that plan.

If you are a new employee, we welcome you to our team and if you are a seasoned employee of J.J. MCGUIRE GENERAL CONTRACTORS INC. then this policy and program will reinforce our efforts to achieve and maintain a zero accident condition throughout our company.

Yours in Safety,



Mitch Newbold,
Vice President Operations
January 3, 2018

J.J. MCGUIRE GENERAL CONTRACTORS INC.

Workplace Violence Prevention Policy Statement

For the purpose of this Policy, the term workplace violence as defined in the Occupational Health and Safety Act is as follows:

Workplace Violence

- (a) the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- (b) an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to a worker;
- (c) a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

J.J. MCGUIRE GENERAL CONTRACTORS INC. strives to provide all employees, suppliers, contractors and visitors with an environment free of workplace violence. Mutual respect must be the basis of interaction, co-operation and understanding among all staff and/or contractors. J.J. MCGUIRE GENERAL CONTRACTORS INC. will not tolerate or condone behaviour that is likely to threaten the health and safety of any of our workers or contractors. This policy applies to all business operations and personnel as well as social events that are organized by or on behalf of the company.

Acts of workplace violence can take the form of either physical contact or threat of physical contact. They may occur as a single incident or may involve a continuing series of incidents. Abuse in any form destroys worker confidence and lowers workplace morale. This in turn reduces productivity and can impact quality of life.

Any potential situation of violence that can affect the workplace or another worker shall be immediately reported to their supervisor or directly to Senior Management. All of these incidents shall be investigated and based on the findings appropriate measures will be taken, including disciplinary action and contacting of local authorities.

Successful implementation of this policy will be ensured through effective planning, implementation, open communications and monitoring of procedures regarding the prevention of workplace violence. All workplace parties will receive training regarding standards of workplace behaviour, their roles and obligations, and procedures for dealing with their concerns and issues.

Retaliation against persons who bring a complaint of actual or perceived violence is strictly prohibited and will be dealt with accordingly. A complaint of workplace violence that is intentionally fraudulent, frivolous or malicious may be subject to disciplinary action.

Yours in Safety,



Mitch Newbold,
Vice President Operations
January 3, 2018

J.J. MCGUIRE GENERAL CONTRACTORS INC.

Workplace Harassment Prevention Policy Statement

Workplace Harassment

Workplace harassment is defined in the Occupational Health and Safety Act, as “engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome”. The following examples as cited from the Canadian Human Rights Commission are what we consider to be different forms of harassment. It can include comments or actions related to race, national or ethnic origin, colour, religion, age, sex, marital status, family status, disability, pardoned conviction, or sexual orientation.

Sexual Harassment

Sexual Harassment includes offensive or humiliating behaviour that is related to a person’s sex, as well as behaviour of a sexual nature that creates an intimidating, unwelcome, hostile or offensive work environment or that could reasonably be thought to put sexual conditions on a person’s job or employment opportunities.

We are committed to a workplace that values people and is free from workplace harassment. Every employee, contractor, and/or visitor in our workplace will be treated fairly and with respect. It is the responsibility of senior management, managers, supervisors, workers, contractors and visitors to ensure that a harassment free workplace is fostered and maintained.

Successful implementation of this policy will be ensured through effective planning, implementation, open communications and monitoring of procedures regarding the prevention of workplace harassment. All workplace parties will receive training regarding standards of workplace behaviour, their roles and obligations, and procedures for dealing with their concerns and issues.

Any potential situation of harassment that can affect the workplace or another worker shall be immediately reported to their supervisor or directly to Senior Management. All of these incidents shall be investigated and where appropriate measures will be taken.

Retaliation against persons who bring a complaint of harassment is strictly prohibited and will be dealt with accordingly.

A complaint of workplace harassment that is intentionally fraudulent, frivolous or malicious may be subject to disciplinary action.

Yours in Safety,



Mitch Newbold,
Vice President Operations
January 3, 2018

2.0 RESPONSIBILITY ROLES FOR SAFETY:

Defined duties and responsibilities helps set the parameters that are necessary in order to successfully implement accident prevention strategies and maintain the Internal Responsibility System.

Duties and responsibilities are defined for all management members and Subtrades in order to ensure that there is a clear understanding of our company's health and safety performance expectations.

2.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Ensure communication and documentation of workplace responsibilities to all workplace parties through our orientation process.
- Provide annual updates and review of the Health and Safety coordinator and workplace responsibilities.
- Develop corporate health and safety responsibilities for all workplace parties.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Distribute and communicate information relating to their specific responsibilities to the appropriate parties.
- Respond to and report any nonconformance or deficiencies observed to Senior Management.

Senior Management Responsibilities:

- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.
- To review and approve corporate health and safety responsibilities for all work place parties.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Report any nonconformance or deficiencies observed to the Health and Safety Coordinator.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Follow and document objectives outlined under the specific responsibilities.
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- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.

Foreman Responsibilities:

- Follow and document objectives outlined under the specific responsibilities.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.

Workers Responsibilities:

- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Supervisor the absence of or defect in any equipment or protective device of which the worker is aware and which may endanger himself, herself or another worker.
- Report to his or her Supervisor any contravention of the Occupational Health and Safety Act and Regulations or the existence of any hazard of which he or she knows.

2.2 GENERAL RESPONSIBILITIES PROCEDURE

It is our policy to perform the work of engineering, construction and related activities in the safest possible manner consistent with current Federal, Provincial and Local Occupational Health and Safety requirements.

Setting corporate health and safety responsibilities will be our primary method to communicate to every employee, including any Subtrade companies under our employ and our Safe Work Practices, safety program guidelines and requirements. Each and every one of these responsibilities must be adopted without reservation by all workplace parties. The importance of safety awareness in our corporate philosophy cannot be understated. Our objective is providing the hazard awareness that can identify hazards and reduce accidents and injuries and can be broken down into 3 steps as follows;

Step 1;

Health and Safety Duties and Responsibilities are defined for the following personnel:

- President
 - Health and Safety Coordinator
 - Project Managers
 - Superintendent
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- Foreman
- Health and Safety Representatives

Step 2;

All duties and responsibilities will be communicated in writing and through initial orientation and/or other training sessions. Attendance and/or acknowledgement must be maintained and filed accordingly.

Step 3;

Verify that health and safety duties and responsibilities are being fulfilled through audits and evaluations.

**THE HEALTH AND SAFETY OF OUR WORK FORCES SHALL NOT BE
COMPROMISED FOR EXPEDIENCY AND UNACCEPTABLE PERFORMANCE OF
HEALTH AND SAFETY DUTIES WILL NOT BE TOLERATED.**

2.3 PRESIDENT:

The President Shall:

- Issued a corporate health and safety message related to the J.J. MCGUIRE GENERAL CONTRACTORS INC. Health and Safety Program.
- Review and Approve the President's statement provides a commitment that the health and safety of our workers and our working environment is of the highest priority.
- Provide instruct and direction during review or changes be made in the overall program design, objectives, implementation methods, planning and control of operations and expected levels of performance.
- Maintains overall control of budgets and funding for sponsored safety training and awareness programs.
- Ensure that all aspects of our Health and Safety Program are being applied and that all established safety policies and procedures are administered and enforced at the administration level.
- Ensuring that new management and field personnel are given an orientation to the J.J. MCGUIRE GENERAL CONTRACTORS INC. Health and Safety Program within the first week of assuming their position.

2.4 PROJECT MANAGER:

The Project Manager Shall:

- Ensure all field operations personnel are aware of understand and are effectively practicing the safety policies and procedures as set out in our safety program.
 - Bind all Subtrade companies and suppliers contractually to our corporate safety policy and program. In order that field operations personnel may be kept current on all elements of our safety practices and procedures.
 - Provide guidelines and facilitate training pertaining to safety and healthy work conditions and worker practices, with professional institutions, associations and professional consultants.
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- Work together with his/her project superintendents shall insist on compliance with the Occupational Health and Safety Act and Its Regulations, from both our own staff and of the Subtrade companies engaged on our projects.
- Ensure that our safety program being routinely assessed for its degree of effectiveness, on all our projects, by a competent person. Such safety inspection reports will be forward to management.
- Ensure our equipment is maintained in good condition before being sent to our projects.

2.5 PROJECT SUPERINTENDENT OR HIS/HER COMPETENT REPLACEMENT:

The Project Superintendent Shall:

- Apply safe work operations specific to the project or his/her competent replacement as defined in the Ontario Occupational Health and Safety Act for Construction Projects.
- Carries the legal responsibility for the work site conditions and work practices.
- Insist on compliance to the Occupational Health and Safety Act and its regulations from all J.J. MCGUIRE GENERAL CONTRACTORS INC. field staff, workers and Subtrades engaged in the work, as well as visitors to the work site.
- Ensure all new project superintendents, if not already trained, will be MOL trained within one week of hire.
- Ensure that safe working conditions and practices prevail on the work site, and that all supervisory personnel are familiar with the current legislation pertaining to the Occupational Health and Safety Act and its Regulations.
- Assist with any information or training programs necessary to maintain the standards required.
- Become personally involved in investigating every incident, medical aid and lost time injury to determine the underlying circumstances giving rise to the incident or accident. Ensure worker are to never leave the site for medical reasons, without first being briefed on the situation.
- Collaborate with management in establishing emergency procedures specific to his project, a traffic control protection plan if needed, as well as worker training needs.

2.6 FOREMAN:

The foreman shall:

- Assist the project superintendent or his/her competent replacement in carrying through with all the specified supervisor responsibilities as outlined in our corporate health and safety policy.
 - Ensure the health and safety of his/her crew and that each worker under his supervision is fully aware of the company safety policy and rules of conduct.
 - Ensure that each member of his/her crew understands the safe procedures of the work, the actual and potential hazards of the work and the safety regulations that apply to the work.
 - Verify that each of his/her crew has signed off on the site orientation, pre task plans, hazard analysis, etc. and understand all aspects of the site safety.
 - Insist his/her workers report all injuries and hazards of which they become aware.
 - Check his/her work areas and work practices for hazards and take corrective action as needed.
 - Conduct an initial check for hazards before the commencement of work on a shift and as often as necessary to ensure the health and safety of his/her crew and
-

demonstrates leadership and genuine concern for his/her workers and will set a good example to the crew.

- Immediately investigate the causes and inform the project superintendent or his/her competent replacement accordingly.
- Acquaint new workers to the actual and potential hazards of the job and the safe work procedures as required.
- Act immediately to stop any violations and make it clear such behavior will not be tolerated.

2.7 WORKER:

The worker shall:

- Work safely and in accordance with our corporate health and safety policy and the Occupational Health and Safety Act and its Regulations.
- Observe the right to refuse work, which he/she feels is unsafe to perform, but may, by the same right, be refused permission to work by management if he/she fails to perform safely and in accordance to the Occupational Health and Safety Act and its Regulations.
- Report any unsafe condition, practices, or injuries of which he/she is aware, to his/her supervisor immediately so appropriate action may be taken.
- Inform his/her safety representative of any safety issues.
- Assist new employees recognize job hazards and follow proper procedures.

2.8 SAFETY REPRESENTATIVE:

The Safety Representative is to be appointed at the work site and he/she shall:

- Identifying situations that may be a source of danger or hazard to workers
- Conduct a monthly inspection of the work areas and report his/her findings and recommendations to the Project superintendent or his/her competent replacement and to the Joint Health and Safety Committee so corrective action may be taken.

2.9 THE JOINT HEALTH AND SAFETY COMMITTEE (JHSC) AND ITS FUNCTION:

Where required under the Occupational Health and Safety Act, the workers or their unions shall select at least one Health & Safety Representative. Where the project superintendent or his/her competent replacement has one or more workers employed at the project, one of them should stand as a candidate for the position of Health and Safety Representative, and shall have the appropriate training for this function.

Joint Health and Safety Committees Shall:

Where required under the Occupational health and Safety Act,

- The project superintendent or his/her competent replacement shall be responsible for establishing and maintaining a Joint Health and Safety Committee.
 - The Project superintendent or his/her competent replacement for the work site shall act as the Management Safety Representative, unless otherwise designated to someone else in management, by the President.
 - It is similarly expected that a labourer will stand for the position of the JHSC Labour Safety Representative, representing the workers, provided this is acceptable with the work site labour force.
-

- Both the Management and Labour Safety Representatives for the JHSC, shall, if the project make-up requires it, become "CERTIFIED MEMBERS" as defined under the Occupational Health and Safety Act.

POWERS OF THE JOINT HEALTH AND SAFETY COMMITTEE:

A functioning Joint Health and Safety Committee (JHSC) shall provide an effective voice and catalyst in improving the safety and productivity at the work site.

A Successful JHSC shall be effective by:

- Deal solely with safety issues and must not be allowed to become a general complaint session.
- Guests may be invited to meetings, from time to time, when agreed upon by the committee
- Management response to and ensures involvement to determine the overall success of the JHSC.
- Minutes will be kept of each meeting where each the respective co-chairpersons may take notes and a formal recorded of each meeting will be produced by the secretary.
- Minutes of the Committee meetings shall be posted at the workplace for all workers to review.
- Attendance is mandatory at all scheduled meetings by every member of the respective committees.
- Every representative will be given an opportunity to present his/ her concerns at each meeting. Only one person should hold the floor at one time as co-coordinated by the chairperson.
- Identify hazards at the workplace and to come up with solutions to safety concerns.
- Members of the JHSC should actively take part in the development, implementation and monitoring of all phases of the Health and Safety Program.
- Copies of the JHSC meeting minutes shall be distributed to the participants and the Project superintendent or his/her competent replacement shall forward a copy to the Project Manager and the President.
- Assist in critical injury investigations or resolving work refusals and promptly investigate reports of "dangerous circumstances" at the workplace.

PERIODIC WORK SITE INSPECTIONS BY SAFETY REPRESENTATIVES:

In accordance with the Occupational Health and Safety Act, the JHSC shall:

- Cause a site inspection to take place on a monthly basis and any circumstance that may be a source of danger to workers shall be reported to and considered by the Committee.
 - Unsafe situations requiring prompt attention must be reported to the Project superintendent or his/her competent replacement immediately.
 - Recommendations for remedial action on safety issues will be listed on the Committee meeting minutes and assigned to the responsible party.
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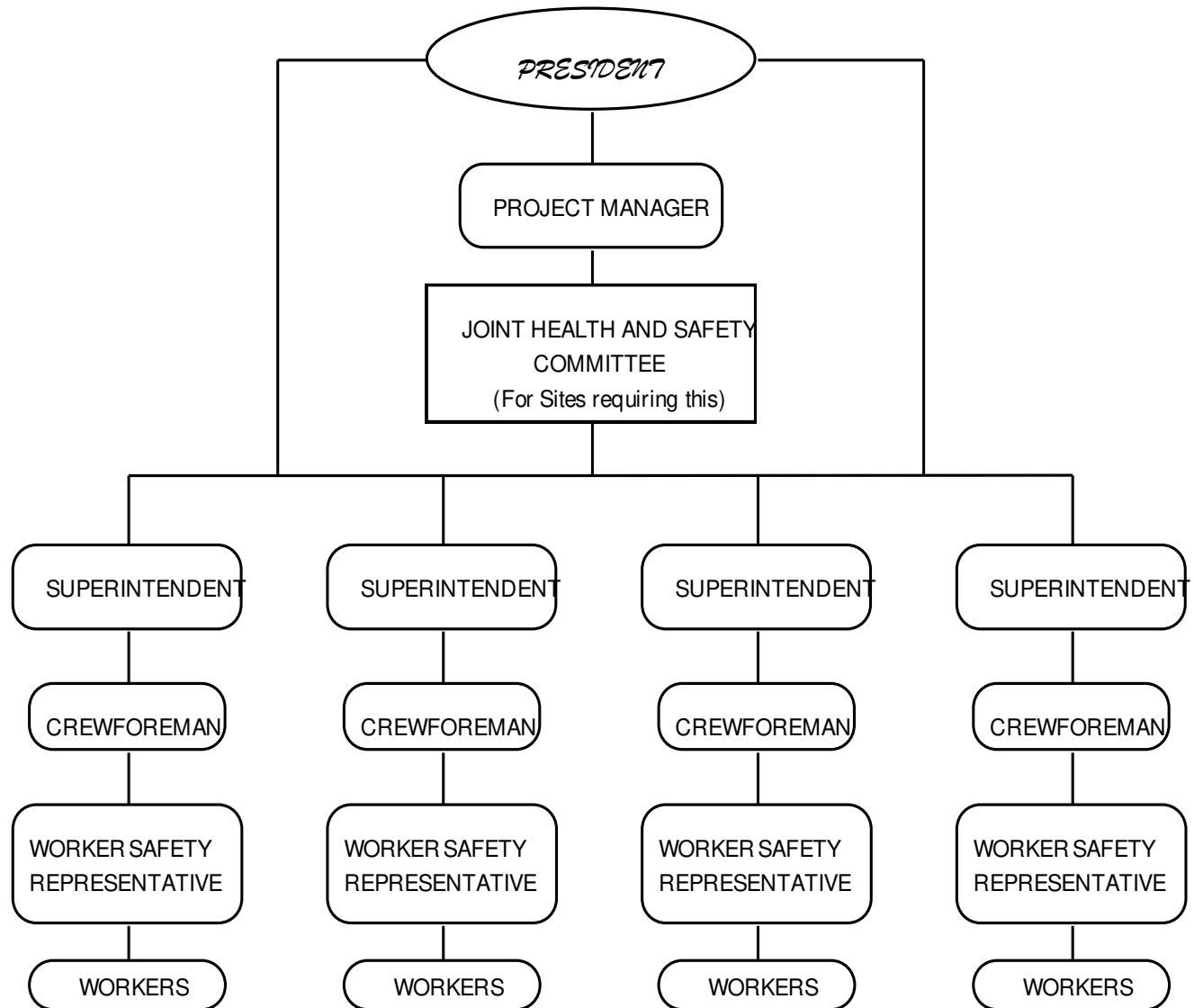
Requirements for Health and Safety Representatives and JHSC For The Workplace

NUMBER OF WORKERS AT A PROJECT REGULARLY	GENERAL REQUIREMENTS
5 (five) or more	one health and safety representative [section 8(1)]
20 (twenty) or more	Joint health and safety committee of two persons. One committee representative selected by management and one committee representative selected by the workers or if it is a unionized project, their unions. [see sections 9(2), 9(5)(a) & 9(5a)]
50 (fifty) or more	A joint health and safety committee of at least four persons. Two management committee representatives and two labour committee representatives. At least one labour and one management representative must be certified. [see sections 9(5f), 9(5g) and 9(8a)]
Trades Committee:	The joint health and safety committee shall cause a worker trades committee to be formed. [see section 10] <u>THE DURATION OF A PROJECT MUST EXCEED 3 (three) MONTHS</u>

3.0 COMMUNICATIONS AND SPECIFIED RESPONSIBILITIES:

The following pages outline the flow of communications within our organization and the specified responsibilities for management, supervisors and workers. All employees and management personnel are to familiarize themselves with these procedures.

COMMUNICATION FLOW



3.1 WORK REFUSAL PROCESS WHERE HEALTH & SAFETY IS IN DANGER

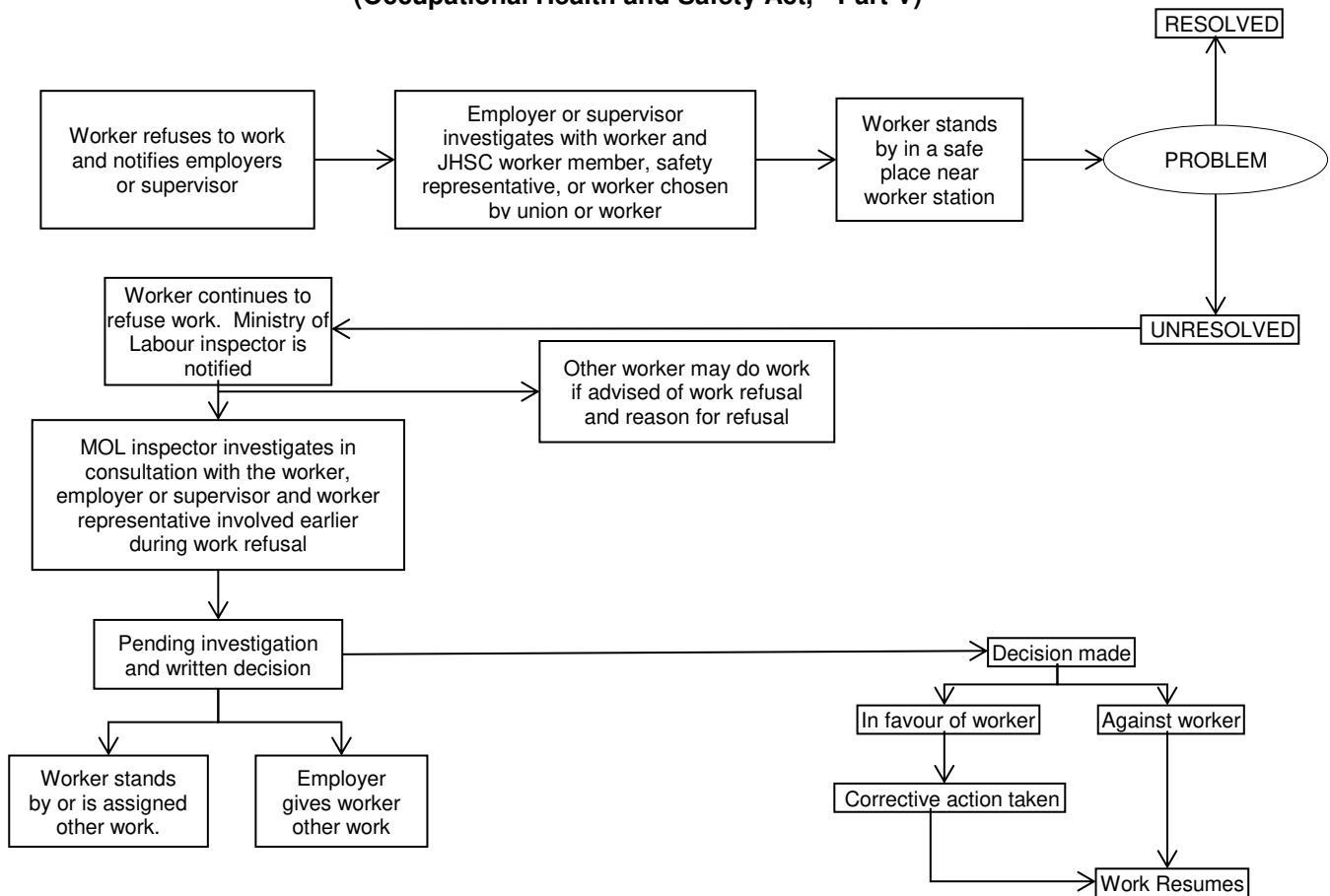
Should a worker feel that the assignment given to him may place his health or safety in danger, the worker has a right to refuse, what he perceives to be unsafe work. The worker will notify his immediate supervisor or employer of the work refusal and the superintendent and /or employer must immediately assess the situation in consultation with of a Joint Health & Safety Labour Committee member, his labour safety representative or a worker chosen by his union or fellow workers.

The employer and / or superintendent have a legal responsibility to investigate and make a determination whether the work refusal is substantiated and if so, make the necessary corrections. Another worker may perform the work being refused provided he is informed that an unsafe work refusal is in process and is explained the reasons for the work refusal.

If the employer and / or supervisor do not agree that a “dangerous circumstance” exists, the Ministry of Labour inspector for the area must be notified and this M.O.L. inspector will investigate the work refusal in the presence of the employer, supervisor, labour safety representative. Pending the results of the investigation, the worker refusing the work may be assigned another job during the investigation process or stand by for further direction by the employer. The Ministry of Labour inspector’s decision is final.

RIGHT TO REFUSE WORK WHERE HEALTH AND SAFETY IS IN DANGER

(Occupational Health and Safety Act, - Part V)



3.2 SPECIFIED HEALTH AND SAFETY PROGRAM MANAGEMENT RESPONSIBILITIES

Management's primary responsibility is to document and provide a safe and healthy work environment and to ensure that the measures and procedures required by the Occupational Health and Safety Act and its regulations and our corporate safety policy are carried out on our projects. Management will maintain an accurate and up to date record of all safety training for all employees.

J.J. MCGUIRE GENERAL CONTRACTORS INC. **require** all management personnel, including Subtrades on our projects, to ensure that:

1. Work in compliance with – Management Responsibilities as found in OSHA and the applicable Regulation see Appendix BB.
2. All employers and employees on our projects comply with the Ontario Health and Safety Act and its regulations.
3. Safe work procedures and practices are adhered to.
4. The equipment and protective devices required by law are provided, maintained in good condition and used as prescribed.
5. Only competent persons, based on their knowledge, experience and training, are to be appointed as supervisors and that these supervisors are capable of safely organizing their work and its performance with an awareness of the hazards and safety laws applicable to their work.
6. Information, instruction and supervision is provided to workers for their health and safety.
7. Every precaution reasonable in the circumstances is taken to protect the health and safety of the workers.
8. Accidents and incidents are fully investigated and the findings forwarded to senior management for appropriate action.
9. All workers are aware of any actual or potential hazards that may be present in their jobs and at the workplace.
10. All employers and employees comply to the WHMIS (workplace hazardous materials information system) regulations and that all material safety data sheets and corresponding labeling are provided for all hazardous materials delivered, stored, handled or used in the workplace.
11. Safety violations are dealt with in accordance to the governing safety policy and result in warnings and disciplinary action.

3.3 SPECIFIED HEALTH AND SAFETY PROGRAM SUPERVISOR RESPONSIBILITIES

All supervisors (Superintendent and Foreman), including SUBTRADE SUPERVISORY PERSONNEL shall supervise the work of workers under their authority, either personally or by having an assistant who is a competent person, do so personally.

All supervisors must:

1. Works in compliance with the OSHA and the applicable Regulations.
 2. Ensure all workers including Subtrade employees are orientated to the J.J. MCGUIRE GENERAL CONTRACTORS INC. corporate health & safety policy and program.
 3. Ensure that all workers work in a manner that will not endanger themselves or other workers.
 4. Conduct weekly documented weekly site inspections and follow-up activities as required to prevent reoccurrence.
 5. Apply progressive and applicable disciplinary actions to enforce site specific requirements.
 6. Ensure that workers wear and use the proper personal protective equipment, devices or clothing that is required by the employer to prevent injury.
 7. Advise worker and management of any potential or actual health and safety hazard of which he/she may be aware.
 8. Prepare and ensure compliance to applicable Emergency Response plans.
 9. Provide the information, instruction, and supervision to protect the worker's health and safety.
-

10. Review each Pre-Task and Hazard Control Plan with the Health and Safety Coordinator and sign off on completeness. The Superintendent will provide the completed site specific Pre-Task and Hazard Control Plan of expected work descriptions and scheduled activities as part of the Pre-Task and Hazard Control Plan Form.
11. Take every precaution reasonable in the circumstance to protect the health and safety of workers.
12. Where prescribed by law, provide oral and/or written instruction to a worker (in a language he/she understands), as to the measures and procedures the worker is to follow for his/her protection.
13. Hold weekly safety meetings with the crew and provide minutes of these meetings to the J.J. MCGUIRE GENERAL CONTRACTORS INC. project superintendent for review.
14. Investigate all accidents/incidents promptly and provide a written report of the findings, with corrective measures to prevent a recurrence, to the J.J. MCGUIRE GENERAL CONTRACTORS INC. head office immediately.
15. Deal with worker safety violations in a responsible and disciplinary manner, and provide documentation of the circumstances and action taken to management.
16. Obtain a "declaration of supervisor competency" from Subtrade on our projects.
17. Site Supervisor/Foreman will conduct weekly inspections and may be completed in conjunction with the Health & Safety Representative or independent.

3.4 SPECIFIED WORKER RESPONSIBILITIES

ALL WORKERS SHALL:

1. Work in compliance to the occupational health and safety act and its regulations.
2. Work in compliance with the governing corporate health and safety policy.
3. Wear and use any personal protective equipment/clothing that is required for his/her health and safety.
4. Report any hazardous conditions or unsafe practices immediately to their supervisor.
5. Work in a manner that will not endanger his/her self or other workers.
6. Report any accidents/incidents regardless of its severity, to his/her supervisor, without delay.
7. Not remove or make ineffective any protective device required by the regulations or by the employer without providing an adequate temporary protective device and when the need for removing or making ineffective the protective device has ceased, the protective device shall be replaced immediately.
8. Not engage in any prank, contest, and feat of strength, unnecessary running or rough boisterous conduct.
9. Shall exercise his right to know and undertake the precautions to be taken when working with hazardous materials in the workplace, by reviewing the material safety data sheets for the particular material in question and follow the instructions outlined in addition to any further measures, for his/her protection.
10. Obtain first aid promptly and notify their supervisor of any first aid situation that becomes a medical aid condition so the proper authorities can be notified.
11. All employees are prohibited from consuming any alcoholic beverages or being under the influence of alcohol, on our projects. Workers are to notify their supervisor if he/she has to take prescription drugs that may affect their functional abilities while on the job.

3.5 SUBTRADE RESPONSIBILITIES

See guidelines [Section 14, page 72]

4.0 PROGRESSIVE DISCIPLINE

Progressive Discipline will be used as a deterrent to prevent employees from working in an unsafe manner. This procedure will become a "last resort" management tool in the prevention of workplace accidents and/or unsafe acts or conditions.

Progressive Discipline will be used as an equal and unbiased means of enforcement of company policies and procedures to all workplace parties.

4.1 PROGRAM RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Ensure all company employees receive the appropriate training and workplace specific overviews.
- Defining and setting acceptable standards in the workplace for safe work practices and procedures.
- Distribute applicable disciplinary policies and forms as needed.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.

Senior Management Responsibilities:

- Defining and setting acceptable standards in the workplace for safe work practices and procedures.
- Ensuring this policy is applied objectively, promptly and consistently to all Subtrade and worker.
- Follow up on Progressive Discipline documentation and recommendations as required.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the equipment, materials and protective devices are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Ensuring this policy is applied objectively, promptly and consistently to all Subtrade and worker.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.

Superintendent Responsibilities:

- Regularly communicate performance expectations with Subtrade and worker and to confirm expected consequences of non-compliance.
 - Ensuring this policy is applied objectively, promptly and consistently to all Subtrade and worker.
-

- Take prompt and appropriate action any workplace party is working in an unsafe or ineffective manner.
- Take prompt and appropriate action any workplace party is working in an unsafe or ineffective manner.
- Documenting all disciplinary activities on the appropriate form.
- Review findings with each Foreman to ensure that corrective measures are taken.
- Follow-up on the findings and implement recommendations for each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Documenting all disciplinary activities on the appropriate form.
- Ensure, where reasonably possible, that every Subtrade, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.

Workers Responsibilities:

- Work in a manner that is consistent to all corporate policies, procedures and training objectives.
- Advise Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

4.2 PROCEDURE

If any worker or Subtrade who willingly or unwillingly work in an unsafe manner or is not following corporate policies, procedures or training objectives, the Superintendent, and the Foreman must take reasonable precaution to prevent this situation from reoccurring including appropriate Progressive Disciplinary Actions.

4.3 DOCUMENTING CONTRAVENTIONS WITH WORKERS:

Where J.J. MCGUIRE GENERAL CONTRACTORS INC. Workers are in contravention of their workplace responsibilities or Safe Work Practices, they will be subject to any of the following disciplinary actions as is appropriate in the circumstance:

1. Verbal or written warning
 2. Written warning
 3. Removal, suspension or dismissal
-

The Corporate Progressive Disciplinary Policy will be included in orientation package and communicated to all new hires. All disciplinary actions must be delivered in a fair and progressive manner. If disciplinary actions must be taken against our Worker, the following steps must be followed as a minimum;

1. The Worker must be asked to stop work and proceed to a private location or appropriate safe location.
2. The workers direct **Manager/Superintendent**, OR **Foreman** must be present when the disciplinary actions are taken and records must be taken.
3. The Worker must be notified in writing of the reason for the disciplinary actions.
4. The Worker must also be given a chance to defend or explain his/her actions.
5. Documentation of the disciplinary actions will use our Progressive Discipline Form (TAB NN) and must be forwarded to **Senior Management** and the **Health and Safety Coordinator** as well as the involved worker.

Note:

Termination of a worker's employment can only be done with the consent of Senior Management.

If there is reason to believe that the worker may potentially become aggressive then do not put your safety at risk. Dial 911 immediately and request police services.

4.4 DOCUMENTING CONTRAVENTIONS WITH SUBTRADES:

J.J. MCGUIRE GENERAL CONTRACTORS INC. require all Subtrades, vendors and/or suppliers of goods and services, to comply with the Occupational Health and Safety Act and its Regulations for construction projects (current edition).

Subtrade are required as part of the J.J. MCGUIRE GENERAL CONTRACTORS INC. sub-contractual agreement to comply with the J.J. MCGUIRE GENERAL CONTRACTORS INC. Corporate Health and Safety Policy.

HEALTH AND SAFETY CONTRAVENTIONS OBSERVED AT THE WORK SITE MAY BE RECORDED BY THE PROJECT SUPERINTENDENT OR HIS COMPETENT REPLACEMENT OR AN AUTHORIZED REPRESENTATIVE, THROUGH A DOCUMENTED WRITTEN WARNING FORM.

In the event that a Subtrade refuses or neglects to rectify a hazardous condition, practice or any violation, J.J. MCGUIRE GENERAL CONTRACTORS INC. shall exercise the right to take immediate steps to correct the unsafe condition at the expense of the responsible parties.

This will be recorded on form (TAB I) completed by the Health and Safety Site Representative in conjunction with the Health and Safety Coordinator and Superintendent. The complete form will be copied with one copy left on site and one sent to the VP of Operations.

Dismissal of an employee shall be reviewed with a party of three:

1. Superintendent,
-

2. Management Representative member of JHSC.
3. Labour Representative member of JHSC.

J.J. MCGUIRE GENERAL CONTRACTORS INC. may also remove from the work site any individual whom continues to cause the unsafe condition to remain or performs in a manner inconsistent with the guidelines of the Occupational Health & Safety Act, its Regulations or our Safety Policy.

If there is reason to believe that the worker may potentially become aggressive then do not put your safety at risk. Dial 911 immediately and request police services.

AS A MINIMUM SUCH WRITTEN WARNINGS SHALL INCLUDE:

- Project name and number
- Subtrade / vendor responsible
- Identity of Subtrades Superintendent / Foreman in charge of the work, and his signature of acknowledgment
- Names of individual violators if any an explanation of the health and safety violation observed
- Reasonable date and time as to when the infraction is to be rectified
- The signature of J.J. MCGUIRE GENERAL CONTRACTORS INC. project superintendent and the safety representative.

Distribution of safety directives shall be as follows:

- Copy to the supervisor in charge of the subcontract work
- Copy to the project superintendent or his competent replacement
- Copy to the Subtrades head office
- Copy to the J.J. MCGUIRE GENERAL CONTRACTORS INC. president

<< NOTICE >>

Violations to the following safety concerns represent a serious level of neglect and the J.J. MCGUIRE GENERAL CONTRACTORS INC. project superintendent or his competent replacement has the right to exercise a "ZERO TOLERANCE" policy and have the violator(s) dismissed from the project. No further warnings are required or will be given:

Fall protection violations
Trenching violations
Lock-out and tagging violations
Confined space work violations

5.0 THE CORPORATE SAFETY PROCUREMENT SYSTEM

Through Subtrade Procurement procedures, we will be able to select Health and Safety minded Subtrades and Suppliers based on a selection process that incorporates a review of the Subtrades past performance and documented policies and procedures.

All prospective Subtrade or Supplier is provided with information pertaining to our health and safety requirements and can bid on the work accordingly. Procurement of appropriate Subtrades will help achieve our corporate health and safety objectives.

5.1 RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Development workplace requirements under Subtrade requirements.
- Assist in the completion of Subtrade checklists under the Letter of Intent.
- Assist where requested in requesting Subtrade documents to ensure all Subtrades can demonstrate competency and implement the site specific workplace requirements.

Senior Management Responsibilities:

- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.

Project Manager Responsibilities:

- Ensure communication of the requirements is scheduled with all site level personnel including workers and Subtrades.
- Requesting Subtrade documents to ensure all Subtrades can demonstrate competency and implement the site specific workplace requirements.
- Review defined workplace specific requirements.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Review submitted documents to ensure all Subtrades can demonstrate competency and implement the site specific workplace requirements.
 - Review findings with each Foreman to ensure that corrective measures are taken.
 - Follow-up on the findings and implement recommendations for each unsafe condition.
 - Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
 - Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
-

Foreman Responsibilities:

- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Ensure, where reasonably possible, that every Subtrade, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.

Workers Responsibilities:

- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

5.2 EVALUATING SAFETY AND COMPLIANCE OF SUBTRADES:

The Project Manager shall be responsible for qualifying Subtrades and Suppliers and will ensure that all Subtrades are provided a Subtrade checklist Letter of Intent requesting:

- Subtrade Health and Safety Agreement
- Declaration of Competent Supervisor
- Ministry of Labour form 1000
- Copies of your Health and Safety Program Policy
- Current WSIB certificate of clearance Certificate and CAD 7
- Certificate of Public Liability and Property Damage insurance certificate showing coverage of this project and naming J.J. MCGUIRE GENERAL CONTRACTORS INC. as an additional insured
- Emergency Contact Information
- Subtrades Written Safe Work Plan

Copies and records of the above written documents will be maintained by the Project Manager with the Project Files at the Head Office.

Non-Compliance Penalties

- The Subtrade shall hold harmless the owner, constructor and their respective officers, employees for any failure by the Subtrade to comply with their statutory responsibilities.
 - The Subtrade shall be responsible, financially and otherwise for the non-compliance of his employees, Subtrades, suppliers or visitor on the project.
-

- Progressive discipline and penalties may be levied without recourse, against the Subtrade, his employees, suppliers or other person for non-compliance.
- Verbal, written and removal from site provided on a progressive and documented method
- Immediate ejection from the site of any offending employee, Subtrade, supplier or another person, temporarily or permanently

6.0 PROJECT EMERGENCY RESPONSE AND LAYOUT INFORMATION

Through the use of a well-planned project layout and emergency response, the project will be able limit suffering, losses and resume normal operations as soon as reasonably possible.

A documented project layout and emergency response will be developed for each construction project. Once developed, the scope of the Emergency Plan and requirements (location specific) will be explained to all site personnel.

6.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Assist in developing site and location specific Emergency Response Plans for each workplace.
- Coordinate with management personnel to ensure emergency drills are conducted where required.
- Arrange training for workers regarding Emergency Response as required.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any emergency situations or deficiencies reported.

Senior Management Responsibilities:

- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Post or ensure Constructor or Owner has a site specific emergency procedures and a response plan in a high traffic area available for reference.
 - Assist in develop location specific emergency procedures and a response plan where required.
-

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Ensure general communication to all site level personnel the site specific emergency procedures and a response plan.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Post site specific emergency procedures and a response plan in a high traffic area available for reference.
- Assist in develop location specific emergency procedures and a response plan where required.
- Follow-up on the findings and implement recommendations for each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Post the site specific emergency procedures and a response plan in a high traffic area.
- Assist in conducting emergency drill where required.
- Ensure, where reasonably possible, that every Subtrade, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.

Workers Responsibilities:

- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations, emergency situation or the absence/defect in any equipment or protective device.

6.2 PROCEDURE

An Emergency Response plan will be developed for each company location or site by the Health and Safety Coordinator and/or Project Manager the where a site specific plan has not already been provided by the Constructor or the Project Owner.

The Project Manager and Foreman must do walk through or site review to define the Site Access and Routing to ensure adequate plan implementation. These plans must be

available so that in the event of an undesired event, all workplace parties are able to respond in an effective manner and used in the development of the emergency response plan.

A site specific Emergency Response Plan will be made for each project. All Foreman, Workers and Subtrades will receive an explanation of the Emergency Plan during initial or site orientation meetings.

As a minimum, all emergency plans will include;

- Procedures for Evacuation and Emergencies
- Emergency Warning Systems
- Emergency Contact Information
- Maps and/or directions to the nearest medical facility

The Emergency Plan will be posted on the bulletin board or a common high traffic area. Emergency Drills will be conducted annually to evaluate the plan and make any necessary changes. Additionally, a formal review of the Emergency response plan shall be conducted after an emergency which caused the initiation of the plan to evaluate the critical components of the overall response process.

6.3 WORK SITE ACCESS AND ROUTING:

As soon as practical, during the on-site mobilization process, the project superintendent will develop an emergency access plan specific to the site with major access routes identified for emergency vehicles. The site drawing or plan shall contain the following minimum information and be posted in the site trailer and at each First Aid Station. *This emergency access plan shall be communicated to all Subtrades:*

- Location of entrances and major access routes to site.
- Location of J.J. MCGUIRE GENERAL CONTRACTORS INC. site office.
- Location of Emergency Telephones.
- Location of First Aid Stations.
- Location of Washroom Facilities.
- Location of storage and parking areas.
- Location of Fire Hydrants.
- Location of other fire protection equipment, (Eg. Fire Extinguishers)
- Location of Overhead Power Lines.
- Location and Street names of streets around site.

AMBULATORY ROUTE TO NEAREST HOSPITAL

All project superintendents or their competent replacements must post an ambulatory route map indicating the nearest hospital to the project, with its most direct route. Emergency procedures and telephone contact numbers must accompany this posting.

An EMERGENCY is general defined as any event causing loss of life, immediate property loss or an immediate threat to the public or workers. Specifically, an **EMERGENCY** can be any of the following incidents as prescribe in Construction Regulations:

For the purposes of the Act and Regulations, "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) involves the amputation of a leg, arm, hand or foot but not a finger or toe;
- f) consists of burns to major portion of the body, or
- g) causes loss of sight in an eye

Prescribed reportable incidents

- a) Any critical injury or death as defined by the Occupational Health & Safety act.
- b) A worker falling a distance of three metres or more.
- c) A worker who falls and is arrested by a fall arrest system.
- d) A worker becoming unconscious for any reason.
- e) Accidental contact by a worker or by a worker's tool or equipment with a live electrical conductor or live electrical equipment [fuses, switches, disconnects].
- f) Contact by a backhoe, shovel, crane or similar lifting device or its load with an energized power line rated at more than 750 volts.
- g) Structural failure of all or part of false work designed by, or required by the Act or its regulations to be designed by a professional engineer.
- h) Structural failure of a principal supporting member, including a column, beam, wall or truss, of a structure.
- i) Failure of all or part of the structural supports or a scaffold.
- j) 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.
- k) 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.
- l) Overturning or the structural failure of all or part of a crane or similar hoisting device.

PRIMARY CONSIDERATIONS:

Stabilize the situation to the extent possible:

- ensure medical assistance is provided
- preserve the accident scene
- ensure no further damage occurs by:
 - cutting off power, gas, water lines, etc.
 - shore, brace, secure or stabilize area from further damage
 - isolate the area where it is not practical or safe to stabilize
 - insure the public and/or workers are protected

Restore access and services as soon as possible when permitted by the authority in charge – eg. Police, Fire Department, Ministry of Labour, Gas Company, Utility Company, Property Owner or Agent **Comply** immediately with any instruction or order given by the authority in

charge, eg. – Police, Fire Department, Ministry of Labour, Gas Company, Utility Company, Property Owner or Agent.

Instruct all employees and trade Subtrades not to provide information to the press but to direct them to the designated spokesperson [project superintendent]. This information should be provided a the tie of hiring, transferring or mobilization information can be obtained from the press and authorities will be:

Leo Urrasio - VP of Finance Mobile: 416-435-3624

Code of Conduct:

- Do **not** speculate
- Do **not** assess blame or fault
- Do **not** use unnecessarily inflammatory language when describing the situation – e.g. refer to it as an emergency not a disaster.
- Do provide the names and telephone number of the corporate designated spokesperson who will provide follow up and background information to the press and authorities.
- Do provide the designated corporate spokesperson with accurate information as soon as it becomes available. Names, ages, addresses, occupations, etc. of the injured parties. Also all pertinent information relating to the actual situation – who, what, where, when, how. Include actions taken or planned.
- Retain all information relating to the emergency services attending the site.
- Service, name, rank, actions, follow up, etc.,

c) EVACUATION CONTINGENCY PLAN:

In a critical emergency (e.g.- uncontrollable fire), the evacuation plan will be as follows:

- All visitors will follow the instructions of your host.
- Evacuate the site and office areas through the nearest exits (see site layout).
- Meet in a designated gathering zone as far from the fires, spills, or other hazard as necessary so a head count can be taken. Notify adjoining neighbors.
- This will be appropriately integrated with external authorities (police, fire department).
- Notify the head office immediately of the fire, spill or another hazard.
- The J.J. MCGUIRE GENERAL CONTRACTORS INC. site superintendent or his/her competent replacement will be responsible for activating the emergency responses appropriate to the event.

d) EMERGENCY RESPONSE WARNING SYSTEM AND EQUIPMENT:

When an emergency arises, someone must start the emergency response process. This may be an individual on the project or someone in authority. It may be necessary to have a siren, horn or whistle signal to alert individuals that an emergency exists so that appropriate action is taken. In certain situations, the J.J. MCGUIRE GENERAL CONTRACTORS INC. supervisory personnel may have to consider the extra emergency equipment which may be required to assist ambulatory response personnel in evacuating the injured from difficult to access areas. Such equipment may consist of:

- Basket stretchers equipped with four way spreaders for removal from pits.
 - Approved rescue containers to raise/lower personnel via crane.
-

e) HAZARDOUS SPILLS CONTINGENCY PLAN

In the event of a hazardous spill, the following contacts should be made:

- Ensure no danger to personnel - Evacuate them from the spill scene.
- Assess the situation and notify the Health and Safety Coordinator.
- The Health and Safety Coordinator shall notify his/her senior management.
- The Health and Safety Coordinator shall assess the situation and call the Spills Action Centre and provide notification and any other related information they request.
- The Health and Safety Coordinator shall begin organizing the containment and removal of the hazardous spill through the assistance of the local authorities.
- The Health and Safety Coordinator shall contact and notify the owner of the property.
- Clean-up efforts shall be dictated by the requirements set out by the Federal, Ministry of Environment.

f) FIRE PROTECTION POLICY:

Localized or minor fires may be handled by qualified operators in how to properly use fire extinguishing equipment.

- a) Fire extinguishers shall be readily available near all open-flame operations, including welding operations, fuel fired equipment, where combustible or flammable liquids are stored, handled or used.
- b) Fire extinguishers are to be marked with their appropriate manufacturer symbols designating its class and use and their WHMIS supplier label. These fire extinguishers are to be routinely inspected on a monthly basis and tagged as such, indicating the date of inspection and by whom. 4A40BC class fire extinguishers are required.
- c) Classification of Dry Chemical Fire Extinguishers:

Class A <u>Ordinary flammable</u>		Class B <u>Flammable liquids and Gases</u>		Class C <u>Electrical</u>
Trash	Cloth	Oils	Gasoline	Motors
Wood	Rubber	Oil based paints	Propane	Switch-gears
Paper	Plastics	Acetylene	Gases	Electrical Panels
		Solvents		Electrical Wiring

7.0 HEALTH AND SAFETY ORIENTATION AND TRAINING:

When employees or Subtrades to conduct work on behalf of the company, it is important that each group has been made aware of the company specific safety requirements and the other site-specific policies.

Orientation using the company specific package relating to Subtrades and Workers Safe Work Practices which will provide every company employee with the specific health and safety expectations prior to commencing their employment obligations.

7.1 PROCEDURES RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Assist in conducting orientations and collecting documents and ensure both parties sign the documents.
- Assist in coordinate the communication and confirmation of the Employment Guidelines including Safe Work Practices during orientation meetings as needed.
- Schedule any required re-orientation of the employee guidelines package based on revision or addition of required content.
- Maintain all documentation related to the employee guidelines and orientation progress including the Orientation Checklist (TAB G).
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.

Senior Management Responsibilities:

- Ensure all company employees receive the appropriate training and workplace specific overviews during orientation.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace.

Project Managers Responsibilities:

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Conduct orientations and collecting documents and ensure both parties sign the documents.
 - Coordinate the communication and confirmation of the employee guidelines during orientation meetings as needed.
 - Complete all documentation related to the orientation progress including the Orientation Checklist and Sign Offs.
 - Gather existing training and certification documents from employees completing the orientation process.
 - Communicate with the Health and Safety Coordinator that a worker has successfully completed the orientation process with identified paperwork.
 - Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
-

- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure that all workers who are under their supervision have successfully received an appropriate orientation.
- Ensure, where reasonably possible, that all workplace parties comply with all Occupational Health and Safety Act and Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.

Workers Responsibilities:

- Participate in the health and safety workplace orientation.
- Provide employee guidelines sign-off, training documentation and other relevant documentation identified on the Orientation Checklist (TAB G).
- Advise Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

7.2 ORIENTATION PROCEDURE

No person younger than 16 years of age shall be employed or be permitted to be present in or about the workplace while work is being performed.

This policy will reinforce our efforts to achieve and maintain a zero accident condition throughout

Upon hiring employees, the Orientation Checklist (**TAB QQ**) will be completed by the Workers and the Superintendent and/or the Health and Safety Coordinator to detail the following steps;

- Copies of the Employment Guidelines defining the relevant Safe Work Practices package will be provided prior to the commencement of work.
 - The Employment Guidelines will be reviewed directly with all applicable individuals.
 - Upon review of the relevant Safe Work Practices package, an acknowledgement sheets must be completed by a competent individual and handed back to the Superintendent and/or the Health and Safety Coordinator prior to the commencement of work with both parties having signed the document.
 - Review and verify that all mandatory training requirements are met and arrange any subsequent required training accordingly prior to the commencement of work.
-

- All minimum qualifications identified must be met by each position including years of experience and required certifications prior to commencing work.
- Complete the Orientation Checklist (**TAB QQ**) to detail the entire process for the compliance and awareness of topics.

7.3 SITE SAFETY ORIENTATION:

It is a J.J. MCGUIRE GENERAL CONTRACTORS INC. SUBTRADES policy that each trade Subtrade ensures its workers engaged on our projects, are aware of:

- Their obligations under the Occupational Health and Safety Act.
- Specific hazards to the site and of the work.
- J.J. MCGUIRE GENERAL CONTRACTORS INC. safety policies and procedures.
- Hiring Clients Drug and Alcohol Policy to Subtrades where applicable.

It is a J.J. MCGUIRE GENERAL CONTRACTORS INC. policy during pre-award negotiations with any trade Subtrade, that the trade Subtrade be made aware of and become contractually bound to the J.J. MCGUIRE GENERAL CONTRACTORS INC. Pre-Task Plans (PTP), Safe Work Practices and Orientation Checklist (**TAB QQ**). This process fosters the desired attitudes and reinforces the J.J. MCGUIRE GENERAL CONTRACTORS INC. commitment to a safe work environment.

The Superintendent or his/her competent shall ensure that all employees, direct or sub-contractual, are orientated to our PTP, Health and Safety Guidelines and Orientation Checklist (**TAB QQ**). Personal skills in the proper use of safety equipment and construction hazards recognition, specific to the project should be communicated to all employees before starting work.

When operating under a General Subtrade or Constructor, all J.J. MCGUIRE GENERAL Subtrades staffs and Subtrades must attend a provided site orientation by the General Subtrade or Constructor. Records of this site orientation shall be kept by completion of (**TAB QQ**)

7.4 SAFETY TRAINING:

It will be the responsibility of the Health and Safety Coordinator or competent designate to review the Health and Safety Related Training Requirements of everyone in the organization, including Senior Management.

The review will be conducted every quarter using the training matrix and documentation as found in the organization's orientation and training files. This process will be documented on the subsequently revised training matrix.

Expired or new training requirements will be initiated and scheduled by the Health and Safety Coordinator or designate with input from Senior Management and Superintendent.

The J.J. MCGUIRE GENERAL CONTRACTORS INC. objective is to deliver health and safety related training to everyone in the organization, including supervisory and

management staff. Basic occupational health and safety awareness training for workers and supervisors that meet the Legislation Requirements. Specific safety related training courses available are:

- First Aid and Cardio-Pulmonary Resuscitation (CPR)
- Health and Safety Representation Certification Training
- Working at Heights - Fall Protection Systems Training
- WHMIS – [Workplace Hazardous Materials Information System Training]
- Construction Safety Act and Regulations Training
- Site Safety Orientation and Hazards Recognition
- Accident Investigation and Reporting Procedures
- Basics of Supervising
- Propane Handler's Certification Training
- MOL Workers Safety Awareness Program
- MOL Supervisors Safety Awareness Program

7.5 WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM:

The Canada-wide Workplace Hazardous Materials Information System (WHMIS) is designed to ensure that all workers have access to information about hazardous products used, stored, handled or disposed of in the Workplace.

In order to meet the requirements of the (WHMIS) regulations, J.J. MCGUIRE GENERAL CONTRACTORS INC. requires all employees, including all Subtrade, to be WHMIS trained, *both fundamentally and specifically* of the hazardous products being used on our sites. No hazardous products shall be handled, stored, used or disposed of on our sites unless the proper labeling and Safety Data Sheets of such materials are on site and made readily available to the workers.

On an annual basis J.J. MCGUIRE GENERAL CONTRACTORS INC. shall re-assess the WHMIS training needs of their employees and retrain if necessary. This reassessment and training is a requirement of the law and the J.J. MCGUIRE GENERAL CONTRACTORS INC. requires all Subtrade to comply.

The WHMIS System requires that all persons exposed to, likely to be exposed to or in close proximity to, hazardous products classified as "hazardous products" under WHMIS, - receive instruction and training to protect their health and safety. The three main elements to this education delivery shall consist of:

- a) **SDS** - Safety Data Sheets - Workers to be made aware of the detailed information contained in these sheets.
 - b) **Labels** - Workers must be able to read and understand the contents of supplier and workplace container labels.
 - c) **Education** - Specific training in the use, handling, storage and disposal of WHMIS hazardous products must be provided to the workers of their protection. All training whether generic or specific, should be arranged in consultation with the Joint Health and Safety Committee.
-

All J.J. MCGUIRE GENERAL CONTRACTORS INC. project superintendents or their competent replacements shall implement the following WHMIS Compliance Plan on our projects to ensure trade Subtrade supervisory and employee personnel remain compliant to Ontario's WHMIS Regulations. No worker shall be allowed to be present on our projects unless Generic WHMIS Training has been provided to said worker.

7.5.1 WHMIS COMPLIANCE PLAN

The WHMIS compliance plan shall be initiated by the Superintendent during the Site Orientation and prior to engaging in work activities on sites. This Plan shall consist of the following information;

1. All workers entering the project shall carry proof of WHMIS Training.
 2. All trade Subtrades shall provide unexpired Safety Data Sheets for all WHMIS hazardous products to be brought on site, to the J.J. MCGUIRE GENERAL CONTRACTORS INC. Project superintendent or his/her competent replacement, before these hazardous products are stored or used on the project.
 3. All trade Subtrades shall ensure WHMIS hazardous products have their required supplier and workplace labels affixed to the outer containers. Labels must also be affixed when hazardous products have been transferred from the original container into another container.
 4. All Subtrade supervisors are to provide site-specific instruction to their workers on the storage, handling, use and disposal of any WHMIS hazardous products brought on site. The J.J. MCGUIRE GENERAL CONTRACTORS INC. project superintendent or his competent replacement will require each trade Subtrade to provide written evidence that their workers have received generic and site specific instruction for their worker's health and safety.
 5. The J.J. MCGUIRE GENERAL CONTRACTORS INC. project superintendent or his/her competent replacement will post all SDS documents in a conspicuous area to allow unrestricted access and review to all workers on the project.
 6. All trade Subtrades are to use the designated storage areas provided to them by the Constructor. Any WHMIS hazardous products not in use shall be kept under storage. Appropriate fire extinguisher equipment shall be provided near these storage areas.
 7. The J.J. MCGUIRE GENERAL CONTRACTORS INC. project superintendent or his/her competent replacement, and when required in consultation with the Joint Health and Safety Committee for the project, shall periodically review the suitability of the WHMIS training and practices in place by the trade Subtrades on site, keeping in mind that the results of such training and instruction provided, must enable the workers to use the information in a performance based manner to protect their health and safety.
 8. Failure to follow safe work procedures in the use, storage, handling or disposal of a hazardous product by a trade Subtrade employee will cause disciplinary measures to be taken against the worker and supervisor of the trade Subtrade.
-

8.0 WORKPLACE INSPECTIONS AND REPORTS:

Workplace inspections will be conducted to identify, monitor, follow-up and control or eliminate all hazards.

Workplace Inspections will help determine the degree of compliance with applicable legislation and site safety policies

8.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Will schedule each Health and Safety Worker Representative to conduct his/her scheduled inspection using at minimum monthly or as directed by the inspection schedules at their current workplace location.
- Conduct a monthly Site Safety Inspection (TAB FF)
- Distribute Workplace Inspection documentation to be used to record the site specific health and safety observations.
- Set general workplace inspection schedule for all required workplace inspections.
- Collect and file all completed Workplace Inspection forms from all completed inspections at the conclusion of each project.
- Inspect Project Binders for the completeness of inspections.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Develop corporate health and safety orientation documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.
- Ensure all company employees receive the appropriate training and workplace specific overviews.

Senior Management Responsibilities:

- Review all completed Monthly inspection for follow-up and Trends identification.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace;

Project Manager Responsibilities:

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
 - Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
-

Superintendent Responsibilities:

- Complete Weekly Workplace Inspections to be completed on all projects under authority according to the schedule and site specific needs.
- Record the findings, observations and follow up activities on the Site Safety Inspection (TAB FF) to demonstrate compliance.
- Site locations that are scheduled to last 5 working days or longer during a standard work week shall have a minimum of one weekly workplace inspection.
- Review findings with each required Foreman to ensure identified non-conformities to correct each unsafe condition.
- Assist in the follow-up on the findings and correction of each unsafe condition.
- Ensure that copies (hard copy or electronic) of completed workplace inspections are submitted to the Health and Safety Coordinator on a weekly basis.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Participate in the review of the completed workplace inspections with the Superintendent to identify unsafe conditions noted on the Site Safety Inspection (TAB FF).
- Assist the Superintendent in the follow-up to the findings and correction of each unsafe condition.
- Ensure records of the corrected unsafe condition are recorded.
- Allow for follow up questions and clarification of topics as needed.
- Ensure, where reasonably possible, that every workplace party complies with all Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.

Workers Responsibilities:

- Participate in the Site Safety Inspection (TAB FF).as required.
- Advise Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the

8.2 INSPECTION PROCEDURE:

As a means to enhance safe working conditions and practices on our projects, and to prevent accidents from happening, safety inspections shall be conducted at all J.J. MCGUIRE GENERAL CONTRACTORS INC. work sites regularly.

The Health and Safety Coordinator ensures an appropriate inspection schedule outlining Health and Safety Worker Representative and Superintendent Inspections.

Formal Site Safety Inspection Form (TAB FF) will be in place to detail the findings, actions taken and distributed. The Workplace Inspection schedule will be at the discretion of the Superintendent or Health and Safety Worker Representative as is as follows:

Inspector	Frequency of Inspection	Date/ Day
Superintendent and Safety	1/week	To be determined at their Construction location each week
Senior Management and Project Management	2/month	To be determined at their Industrial / Construction location during each month

The Health and Safety Worker Representative and the Health and Safety Coordinator will conduct his/her scheduled inspection using the Site Safety Inspection Form (TAB FF) at minimum monthly or as directed by the inspection schedule at their current workplace location.

The Superintendent or a competent replacement will conduct a site level inspection using Site Safety Inspection Form (TAB FF) at minimum weekly as directed by the inspection schedule. Completed weekly workplace inspections shall be signed, dated and maintained on site available for the Health and Safety Coordinator to review as required.

Identified Hazards will be rated based on the likelihood of personal injury or facility, material or equipment damage. This rating system is defined on each inspection form and will be recorded for each identified hazard.

Hazard Rating System:

- A = Major. Potential for loss of life, severe injury or extensive property damage / environmental harm
- B = Moderate. Potential for a disabling injury or serious property damage / environmental harm
- C = Minor. Potential for non-disabling injury or non-disruptive property damage / environmental harm.

Each individual who completes a workplace inspection will ensure or assist in correcting unsafe practices and/or conditions or scheduled these findings to be completed through documented directive to the responsible parties.

The Project superintendent or his/her competent replacement shall ensure such hazardous conditions or practices brought to his/her attentions are rectified in a timely manner. Copies of these project safety inspection reports will be distributed to the Project superintendent or his/her competent replacement and posted on the site bulletin board for review by worker and safety committee members.

Repeated and/or serious violations, will be cause for additional "Corrective Actions" or Progressive Disciplinary Actions where required.

Inspections are to be conducted and recorded for any vehicles, machines, tools, and equipment greater than 10 HP by a competent person annually or more frequently as recommended by the manufacturer.

J.J. MCGUIRE GENERAL CONTRACTORS INC. reserve the right to remove anyone who causes an unsafe condition to exist, or who refuses or neglects to perform in a manner consistent with the safety statutes and our safety policy.

8.3 PRE-USE INSPECTION PROCEDURE:

Inspection of our vehicles, and equipment is not only a good safety measure, it in many cases is also required through legislation. These types of inspections will be performed to ensure that equipment and/ or machinery is maintained in accordance with the manufacturer's specifications and the legislative requirements. Pre-use inspections will following the following steps,

Step 1 - Review legislation, operators or manufacturers specifications to determine the vehicles/ equipment/ processes where inspections are required.

Step 2 - The Supervisor and the Health and Safety Coordinator will obtain or develop inspection checklists for vehicles and equipment

Step 3 - Train workers how to perform inspections, reported defects or other deficiencies observed during inspections are documented on our inspection forms. Substandard or otherwise unsafe conditions must be rectified where possible, reported to management to be scheduled for repair or made safe.

Step 4 - All commercial vehicles and machinery/ equipment will be inspected on a pre-use. Identify specific responsibility to complete each inspection to the required worker(s), operator(s) and supervisor(s).

Note: If a hazardous condition is identified, the vehicle or equipment must not be used until repairs or adjustments have been made by an authorized person. The supervisor must be made aware of the circumstances immediately and given a copy of the inspection report.

9.0 VIOLENCE AND HARASSMENT

The Workplace Violence and Harassment Prevention Policies and Programs have been developed to communicate the accepted corporate health and safety principles. It establishes the right to a workplace free of violence and harassment, and requires employers to take positive action to prevent any form of these issues in the workplace.

The Workplace Violence and Harassment Prevention Programs and Policies are to be regarded by all workplace parties as directives for compliance with the Health and Safety Manual.

9.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Develop a corporate violence and harassment policy statement.
- Ensure all company employees receive the appropriate training and workplace specific Safe Work Practices regarding Violence and Harassment prevention.
- Review, update and provide the corporate violence and harassment policy statement to Senior Management annually.
- Distribute and post corporate violence and harassment policy statement.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate violence and harassment training documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.
- Complete periodic violence risk assessments of active project sites to identify risks, set controls, procedures for summoning assistance and reporting and investigation.

Senior Management Responsibilities:

- Endorse the corporate violence and harassment policy statements.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace;

Project Manager Responsibilities:

- Enforce the violence and harassment policy statement, programs and corporate expectations.
 - Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
 - Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
-

Superintendent Responsibilities:

- Ensure the violence and harassment policy statement, practices, procedures and corporate expectations are met.
- Conduct a workplace violence assessment as it relates to all workplace locations and the head office.
- Assist in conduct incident investigations where reports of workplace Violence and or Harassment have been identified.
- Review findings with each required Foreman to ensure identified and correct each unsafe condition.
- Assist in the follow-up on the findings and correction of each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Assist in conducting incident investigations where reports of workplace Violence and or Harassment have been identified.
- Ensure, where reasonably possible, that every Subtrade, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for the protection of the worker.

Workers Responsibilities:

- Mutual respect must be the basis of interaction, co-operation and understanding among all workplace parties.
- Advise the Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

9.2 VIOLENCE PROGRAM

Required programs, policies or procedures associated with the prevention of workplace violence and/or harassment have been developed and reviewed to ensure compliance with the Occupational Health and Safety Act and Applicable Regulations.

Specific Corporate Workplace Violence and Harassment Prevention Policies have been developed. An annual review will be conducted to each policy is to be signed and dated by Senior Management, distributed by the Health and Safety Coordinator and implemented by all Superintendent and each Foreman.

Specific documents for Workplace Violence Assessments will be developed for all appropriate locations by the Health and Safety Coordinator and completed on the construction sites by the Superintendent or competent designate. An annual review of these assessments will be conducted to ensure all programs, polices and training is appropriate and maintained.

The Superintendent will conduct a Workplace Investigation to determine contributing factors, root cause and follow up actions required where situations of potential Workplace Violence and/or Harassment have been reported.

If Progressive Discipline is deemed necessary, the Superintendent or Senior Management will ensure that the appropriate people are assembled and the documentation is recorded. All related documents must be forwarded to the Health and Safety Coordinator immediately for review and filing.

This policy provides the framework for the development of procedures and programs regarding the prevention of workplace violence. To this end, the following process will be conducted as part of our company workplace violence prevention program:

9.3 RISK ASSESSMENT

Senior Management will ensure a violence risk assessment is conducted periodically on all company locations (Refer to Workplace Violence Assessment Form) (TAB MM). Any risks identified through this process will result in the development and implementation of a specific violence controls to address this risk. Measures for summoning immediate assistance and reporting and investigation procedures. A review of the risk assessment and violence prevention plan will be conducted by Senior Management or designate (e.g. Project Manager) on an annual basis. These documents will also be reviewed and changes will be made, if the following situations take place:

- Change in nature of the workplace, type of work or work conditions*
- Workers or Health and Safety Representative indicate that procedures or programs in place to address workplace violence are inadequate
- Violent incident has occurred

Note: *Nature of the workplace refers to the physical aspects of the workplace, including exits, entrances, lighting and objects that can be used as weapons. Type of work refers to the tasks workers perform and the workplace parties they interact with (e.g. clients, members of the public, etc.). Work conditions refer to work hours, working alone, the surrounding neighbourhood, etc.

As part of the violence risk assessment process, the following issues will be considered:

- Past occurrences of violence at that workplace
 - Violence incidents that have occurred in similar workplaces
 - Potential circumstances and interactions that occur in the course of performing work
 - Geographic location and layout of the workplace
 - Domestic Violence
-

9.4 INCIDENT REPORTING, INVESTIGATION AND FOLLOW-UP

All workers are required to report any act or threatening statement of violence or harassment arising out of their employment, to their respective superintendent.

Senior Management will ensure that all violence and/or harassment incidents are investigated by the appropriate competent designated personnel. Any actions or incidents deemed to be of risk to worker health or wellbeing will be dealt with following progressive disciplinary measures. In addition, local authorities will be summoned where required. This process will be documented and kept on file, and will be used in future risk assessments.

REPORTING

Anyone who experiences or witnesses' violence or a threat of violence in the workplace, or who feels that a colleague or visitor is likely to become violent, is encouraged to report the situation to his supervisor or an alternate from department management as soon as practicable.

The supervisor/alternate shall ensure that first aid and health care treatment are made available promptly, if necessary.

The supervisor/alternate shall promptly confirm that the matter has been reported to Police, and that an ***Injury/Incident Report*** is completed and forwarded to the Health and Safety Coordinator by the end of the business day following the incident.

There shall be no reprisal against any employee or Subtrade employee who, in good faith, reports an incident of violence or participates in an investigation.

DOMESTIC VIOLENCE

If a worker reports that domestic violence may enter the workplace and cause physical injury, precautions will be taken to protect the safety of all workers by implementing appropriate safety measures.

COMMUNICATION

When a worker can expect to encounter a person with a history of violent behaviour in the course of their duties *and* if the worker is at risk of physical injury, the worker will be notified of the risk, and any safety precautions required.

Personal information disclosed shall be limited to what is reasonably necessary to protect the worker.

WORKPLACE HARASSMENT

Workplace harassment can involve unwelcome words or actions that are known or should be known to be offensive, embarrassing, humiliating or demeaning to a worker or group of workers. This can also include behaviour that intimidates, isolates or even discriminates against the targeted individual(s).

9.5 Training

All employee orientations and if necessary, during safety talks, the following items will be reviewed:

- Company Workplace Violence and Harassment Prevention Policy
- Our expectations of conduct while engaging in work activities
- Violence and Harassment prevention procedures, correct response procedures
- Workplace emergency procedures and incident reporting procedures

All Subtrades will be advised of our company policies regarding workplace violence and harassment prevention during site orientations and/or safety meetings.

10.0 TOOLS, EQUIPMENT & VEHICLE PREVENTATIVE MAINTENANCE:

Preventative Maintenance (PM) Programs are implemented to ensure that tools, equipment and vehicles are serviced according to the manufacturer's specifications and/ or to meet all legislative requirements.

We will ensure that all tools, equipment and vehicles used or operated is operating at its full capacity and not being burdened with undue stresses caused by poorly/ under serviced equipment.

10.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Assist in developing PM Program for all workplaces and sites level equipment and vehicles.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Distribute and communicate information to the appropriate parties regarding any non-conformance or deficiencies reported.

Senior Management Responsibilities:

- Arrange for specific PM to be scheduled and followed up.
 - Ensure appropriate PM requirements are completed for all equipment or machinery as required.
 - Take all measures reasonably necessary in the circumstances to protect employees from vehicles and equipment failures and breakdowns.
 - Review Occupational Health and Safety Act and Regulations to ensure compliance within the PM Program.
 - Ensure the appropriate PM is completed for all equipment or machinery is implemented across all areas of responsibility.
 - Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.
-

Project Manager Responsibilities:

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Ensure known site related hazards are defined and appropriate PM requirements are completed for all equipment or machinery as required.
- Ensure appropriate PM requirements are completed for all equipment or machinery as required.
- Ensure Preventative Maintenance schedule colour coded tagging system is used to identify appropriate tools, equipment and vehicles and their stage of maintenance.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure Preventative Maintenance schedule colour coded tagging system is used to identify appropriate tools, equipment and vehicles and their stage of maintenance.
- Take prompt and appropriate action when contraventions with the use or maintenance equipment or machinery been identified.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker

Workers Responsibilities:

- Complete or schedule all equipment or machinery PM as required.
- Report any damage or malfunctioning equipment or machinery immediately to your superintendent / Foreman.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

10.2 PREVENTATIVE MAINTENANCE PROCEDURE

Due to the nature of our projects and the contractual relationship with our clients, there are at times major items of capital equipment owned and maintained by J.J. MCGUIRE GENERAL CONTRACTORS INC. is responsible to ensure all plant and/or equipment located on the work site is maintained in a safe operating condition which meets or exceeds all requirements of the Occupational Health and Safety Act and it's Regulations, as it pertains to the safe operation of that equipment.

J.J. MCGUIRE GENERAL CONTRACTORS INC. shall

The Project superintendent or his/her competent replacement shall monitor and control the periodic inspection, service, maintenance and testing of any machine or equipment located on the work site, including and without limitation, the review of log books, certificates of authorization, service records and safe operating procedures, to ensure compliance with all legislative requirements.

When the Project superintendent or his/her competent replacement transfers or assigns equipment into the control, operation, care or authority of other authorized person(s), the Project superintendent or his/her competent replacement shall ensure that all applicable legislation pertaining to such equipment, is complied with before such transfer. The Project superintendent or his/her competent replacement shall insist that trade Subtrades having equipment on our sites - meet these legislative requirements

All tools and equipment directly owned by all J.J. MCGUIRE GENERAL CONTRACTORS INC. shall be;

- Recorded on an establish equipment inventory.
- All tools and equipment directly owned by J.J. MCGUIRE GENERAL CONTRACTORS INC. shall be maintained in first class working conditions as per our inspection schedule to meet manufacturers and legislated requirements.
- All equipment and tools will be tagged by the Project superintendent using J.J. MCGUIRE GENERAL CONTRACTORS INC. tagging system.

Defective equipment identified shall follow the following procedure;

- Equipment is identified as defective. For items over 10 HP, this is identified on the equipment inspection checklist.
- The defective equipment is immediately reported by the worker to their direct supervisor.
- The supervisor is immediately required to apply a "DO NOT OPERATE THIS EQUIPMENT" tag to the equipment. If the supervisor is unable to apply the tag immediately, he/she must make arrangements for an alternate to do so.
- The supervisor is to remove any operator keys from the equipment immediately and store them in a secure location. If the supervisor is unable to remove the keys immediately, he/she must make arrangements for an alternate to do so.
- The supervisor or alternate will make arrangements for maintenance or substitution of equipment in consultation with the J.J. McGuire Equipment Manager.
- Once the equipment has been serviced or substituted, the tag can be removed, deeming the equipment operational.
- Copies of all service records are to be provided to the J.J. McGuire Equipment Manager for record keeping purposes.

Once the tool and/or equipment has been inspected by J.J. MCGUIRE GENERAL CONTRACTORS INC. Equipment Manager, it will then be tagged according to the following categories:

- Green – Good to use
 - Red – Unserviceable/no good – not to be used
 - Yellow – In need of service/repair – not to be used
-

If the tool/equipment has been deemed good for use, the green tag will remain on and it is ready to be sent out to the next jobsite with a green tag attached.

If the tool/equipment has been deemed in need of service/repair, the yellow tag will remain on until it has been serviced/repared. Upon return from service/repair the tool/equipment will be re-inspected by the J.J. MCGUIRE GENERAL CONTRACTORS INC. Equipment Manager and if deemed good for use, a green tag will replace the yellow tag.

If the tool/equipment is deemed unserviceable/no, then it will get a red tag. If the tool/equipment is deemed unserviceable a red tag will remain and will no longer be used on any site and will be properly disposed of.

10.3 PROCESS AND EQUIPMENT PURCHASE AND/OR MODIFICATIONS:

The purpose of this procedure is to ensure that any goods purchased are assessed for existing or potential hazards and ensuring that appropriate controls are put in place. This procedure also applies to any modifications of existing processes or equipment.

Regulatory compliance and industry standard safety procedures are also expected to be adhered to:

- At the design stage
- In purchase specifications
- During construction and/or
- Installation phases

The Health and Safety Coordinator will:

- Review the new/modified main activities to determine whether hazards exist
- If a hazard does exist, will first attempt to eliminate the hazard(s). If hazard(s) cannot be eliminated, ensure appropriate controls are in place.
- Ensure each new purchase or modification meets all appropriate regulation and industry standards (CSA)
- Be involved in conducting the initial pre-use inspection

Superintendent will:

- Assist with the Hazard review
- Train the appropriate staff who will be exposed to or work with the new or modified equipment or process. This will be documented on the Training Matrix.

Pre-start-up inspections (prior to the initial use of the new, modified or processed equipment will be conducted with the involvement of the:

- Health and Safety Coordinator
- Superintendent
- Any operator or persons who has the potential to operate the machine, or is involved in the new or modified process

All new/modified equipment will be added to the existing list of equipment that requires pre-use operator inspections.

10.4 SAFE DRIVING POLICY

J.J. MCGUIRE is committed to driving safety and minimizing the risk of injury to workers and members of the public, and loss of property arising from vehicle incidents.

The following policy addresses the important safety issues around automobile use while on the job. Application of the safe driving practices outlined in this policy is strongly encouraged while driving during non-working hours as well.

This policy applies to all workers and Subtrades involved in the management and use of all vehicles provided or funded for business purposes. This includes the use of your personal vehicle for work purposes.

- The following standards will be adhered to by J.J. MCGUIRE GENERAL CONTRACTORS INC. and its workers and Subtrades.
- Fleet vehicles will be selected, equipped maintained and serviced to ensure the safety of drivers, passengers and members of the public.
- All incidents and near misses will be reported and investigated in accordance with the Traffic Safety Act and the Occupational Health and Safety Act, and Regulation.
- Driving safety will be managed, monitored and reviewed as part of our general health and safety programs.
- Drivers abstracts will be reviewed as required for all drivers of company owned vehicles.
- Regular maintenance will be performed as per manufactures guidelines on all fleet/company owned vehicles
- Driving safety will be managed, monitored and reviewed. Violations under the Highway Traffic Act and the Ministry of Transportation will also be part of our general health and safety programs

RESPONSIBILITIES

Managers responsible for drivers and vehicles shall:

- Ensure the drivers hold appropriate and current licenses
- Ensure that drivers of commercial vehicles meet medical standards of drivers
- Ensure that drivers do not drive while fatigued; be mindful of workers traveling long distances after their work shift has finished
- Encourage drivers to use safe driving practices
- Select appropriate vehicles for the task
- Monitor and take action on motor vehicle incident data
- Conduct investigations, including driver interviews following motor vehicles incidents
- Ensure that drivers complete mandatory driving safety training and are provided with appropriate driving safety information

Workers who must drive for their job shall adhere to the following safe driving practices:

SPEED

Speed and speed variance (sudden and unsafe increases or decreases in speed) are critical safety issues that contribute to motor vehicle deaths, injuries and property damage. A worker driving unduly fast may place the safety of co-workers or members of the public,

his or her job performance, or the safe and efficient operation of the vehicle at risk. Speeding is not acceptable and adversely affects J.J. MCGUIRE GENERAL CONTRACTORS INC.'s reputation in the community. The speed driven must be appropriate to existing conditions and maximum speed in accordance with posted speed limits. Drivers found to be speeding will be disciplined according to company disciplinary policy.

SEAT BELT USE

J.J. MCGUIRE GENERAL CONTRACTORS INC. recognizes that seat belt use is an important and effective means of protection for our workers. While traveling on J.J. MCGUIRE business, drivers and passengers must use seat belts correctly at all times. The driver will operate the vehicle only after others are buckled up. Drivers and / or passengers on company business will be disciplined according to company policy if found not to be wearing seats belts while driving.

DISTRACTED DRIVING

Operating a motor vehicle requires the driver's full attention at all times and readiness to deal with any emergency situation. Workers of J.J. MCGUIRE GENERAL CONTRACTORS INC. who are driving for work should not engage in any activity that results in them being distracted including, but not limited to, reading, writing, grooming, using cellular phones and manually entering information into computers or navigation systems. When it is safe to do so, workers should pull over and park the vehicle in a safe and legal location prior to using and electronic device. Drivers found to be distracted during driving will be disciplined according to company disciplinary policy.

EMERGENCY PREPAREDNESS

Drivers need to ensure their vehicle is prepared for potential road and weather conditions including equipping it with emergency kit and a winter survival kit appropriate for the areas in which they drive.

TRIP PLANNING

Plan your trips ahead of time. Decide what time to leave so you have enough time to drive safely and arrive on time. Plan which roads to take and make someone aware of your planned route. Try to avoid heavy traffic and poor weather conditions.

OTHER SAFE DRIVING PRACTICES

When driving on J.J. MCGUIRE GENERAL CONTRACTORS INC.'s business, a worker must:

- Provide a copy of a valid driver's license; to be submitted yearly in the month of July.
 - Hold a valid vehicle operator's license for the class of vehicle being driven
 - Comply with the rules and regulations in Ontario's Traffic Safety Act at all times
 - Never drive while impaired by drugs (prescription, non-prescription or illicit) or alcohol
 - Never drive while impaired by fatigue. As a guideline, employees should not drive more than 8 hours per day or more than 5 hours when combined with regular (non-driving)
-

- work. Employees should take a rest break at least every two hours. Ensure you are parked in a safe location.
- At a maximum, provincially regulated drivers can drive 13 hours out of 15 hours on duty and no more than four consecutive hours in accordance with the Hours of Service legislation.
 - Workers under federal legislation may drive for 13 hours of a maximum 14 hours on duty
 - Perform a pre-trip inspection when traveling for an extended period of time. If you are unfamiliar with the vehicle or have not driven it in some time, a more thorough inspection is warranted.
 - Ensure that all loads and miscellaneous articles are properly secured
 - Ensure all equipment is set and adjusted properly (i.e. mirrors, head restraints)
 - Drive with headlights on at all times (not just daytime running lights)
 - Drive defensively
 - Daily walk around inspections will be performed on all company owned vehicles and personal vehicles used for company business.
 - Pull through parking techniques will be employed in parking lots whenever practical. Where pull through techniques cannot be utilized, operators of motor vehicles should back into parking spots.

11.0 ACCIDENT/INCIDENT REPORTING AND INVESTIGATING:

An investigation and follow-up procedure is an essential element of the Health and Safety Program. We shall prepare a written report detailing the entire situation in an attempt to determine appropriate conclusions and follow-up actions needed to prevent reoccurrence.

An investigation and follow-up will be conducted relating to all incidents as defined under our procedure to determine the causes, contributing factors and subsequently implement corrective actions to prevent a reoccurrence.

11.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Distribute Accident/Incident Investigation Report (TAB P) to all Superintendents as required.
- Review all injury reports and follow up with Superintendents and Foreman as required.
- Ensure all required incidents are investigated and appropriate follow up actions are completed.
- Participate in the Investigation process and follow as required.
- Retain all investigation reports and follow up actions as required.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Distribute and communicate information to the appropriate parties regarding any non-conformance or deficiencies reported.

Senior Management Responsibilities:

- Ensure all company employees receive the appropriate training and workplace specific overviews.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace;

Project Manager Responsibilities:

- Ensure all required incidents are investigated and appropriate follow up actions are completed.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Complete the Workplace Investigation from all required situations and complete all required reports by the situation.
- Conduct the Workplace Investigation using the Accident/Incident Investigation Report (TAB P) and complete all required reports required by the situation.
- Ensure accurate recording of Voluntary Witness Statements where required as part of the Accident/Incident Investigation Report (TAB P).
- Document and determine the causes, contributing factors and subsequently implement corrective actions to prevent a reoccurrence from the incident.
- Ensure each recommendation on the Accident/Incident Investigation Report (TAB P) is implemented within the established timelines.
- Review findings with each Foreman to ensure that corrective measures are taken.
- Follow-up on the findings and implement recommendations for each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Immediately report all incidents that require an investigation to be conducted to the Superintendent and Health and Safety Coordinator where required.
 - Manage the accident scene and identify witnesses.
 - Assist in the completion of the Workplace Investigation using the Accident/Incident Investigation Report (TAB P) as required.
 - Ensure, where reasonably possible, that every Subtrade, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
 - Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
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- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.

Workers Responsibilities:

- Assist or participate in the workplace investigation as part of the Accident/Incident Investigation Report (TAB P) as required.
- Provide statements and incident summaries as requested by the Superintendent or Foreman.
- Advise Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any injuries, incidents, contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

11.2 REPORTING AND INVESTIGATION PROCEDURE

All employees and/or Subtrades must be instructed to report all incidents to your Superintendent and/or Foreman immediately. A formal investigation will be conducted regarding incidents as following;

- Outside Medical Aid Required,
- Incidents
- Near Misses
- Critical Injuries
- Property Damage
- Work Refusals
- Notices Required by Governing Authorities
- Fires
- Acts of Violence or Harassing Situations

Investigation Policy

The Superintendent will conduct the investigations with the assistance of the Foreman and where required the Health and Safety Coordinator and Worker Health and Safety Representative within TWENTY-FOUR HOURS of the report being received. Members of the investigation team will be provided appropriate training in the investigation techniques through their Supervisory Awareness Training.

The investigation team will complete the investigation using the Accident/Incident Investigation Report (TAB P) which outlines all company specific investigation techniques and detail all related information required to complete the forms within this kit.

It is the responsibility of the Superintendent to make recommendations and conclusions to identify contributing factors and conduct follow up actions to prevent reoccurrence.

The Superintendent will be required to immediately forward any and all Investigation reports to the Health and Safety Coordinator for review.

Completed investigations reports must be documented with the purpose of coming to contributing factors and preventative actions to be communicated for ongoing proactive initiatives.

Of injuries or incidents caused by or involving Subtrades on our projects, an accident investigation report containing all pertinent information and future preventative measures shall be forwarded to the project superintendent or his/her competent replacement within TWENTY-FOUR HOURS of the occurrence. The project superintendent or his/her competent replacement is responsible for evaluating the cause of all accidents/incidents and the possible effect on other workers doing similar tasks, so that suitable preventative measures can be implemented.

11.3 EMERGENCY RESPONSE AND NOTIFICATION PROCEDURES:

Incidents that have occurred on any J.J. MCGUIRE GENERAL CONTRACTORS INC. work site which fall within the following categories shall be reported to senior management as soon as practicable by telephone or facsimile. Immediately following the accident or incident, a supervisor's accident investigation report form is to be completed and signed by the project superintendent or his/her competent replacement and forwarded to the J.J. MCGUIRE GENERAL CONTRACTORS INC. Safety Manager and President. It is extremely important of our supervisory personnel to report these injuries as there are legal requirements of management to notify the appropriate authorities.

11.3.1 NOTIFICATION PROCEDURES

A) FATALITY/CRITICAL INJURIES:

When an accident occurs and results in the critical injury or death of a worker, the following contacts must be notified immediately:

1. J.J. MCGUIRE GENERAL CONTRACTORS INC. Superintendent or His/Her Competent Replacement
2. J.J. MCGUIRE GENERAL CONTRACTORS INC. Project Manager
3. J.J. MCGUIRE GENERAL CONTRACTORS INC. Senior Management
4. The Ministry of Labour Office
5. The Direct Employer of the Injured
6. Our Health and Safety Coordinator

B) MEDICAL AND LOST TIME INJURIES:

When an accident occurs and which results an injury requiring medical aid to a worker, the following contacts should be notified:

1. J.J. MCGUIRE GENERAL CONTRACTORS INC. Superintendent or His/Her Competent Replacement
2. J.J. MCGUIRE GENERAL CONTRACTORS INC. Project Manager
3. J.J. MCGUIRE GENERAL CONTRACTORS INC. Senior Management
4. The Direct Employer of the Injured Person
5. Our Health and Safety Coordinator

C) FIRST AID INJURIES:

For minor injuries requiring First Aid, the following contacts should be notified:

1. J.J. MCGUIRE GENERAL CONTRACTORS INC. Superintendent or His/Her Competent Replacement
2. The Supervisor of the Injured Worker
3. The Employer of the Injured Worker

D) NEAR MISS INCIDENTS WITH INJURY or PROPERTY DAMAGE POTENTIAL:

1. J.J. MCGUIRE GENERAL CONTRACTORS INC. Superintendent or His/Her Competent Replacement
2. J.J. MCGUIRE GENERAL CONTRACTORS INC. Project Manager
3. J.J. MCGUIRE GENERAL CONTRACTORS INC. Senior Management
4. The Direct Employer Involved
5. Ministry of Labour If Required, Under The Act and Regulations
6. Our Health and Safety Coordinator

11.4 INJURY RESPONSE PROCEDURES

INJURIES REQUIRING FIRST AID ONLY:

1. Have the designated first aid attendant treat the injured person and record the particulars in the first aid treatment log book (TAB M).
2. Inform the injured person to notify his/her foreman or head office immediately if due to complications, he/she visits his/her doctor.
3. Provide the injured person with a treatment memorandum if there is any possibility he/she may visit his/her doctor and instruct him/her to sign and give the memorandum to his/her doctor to fill out. The top copy of this form should be returned to the employer by the injured on the next day.

INJURIES REQUIRING MEDICAL AID:

1. Provide immediate first aid treatment and arrange transportation for the injured to a medical facility by ambulance if required, a taxi or company vehicle accompanied by a first aid attendant or designate (supervisor, foreman, another worker). Should the
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- injured person refuse transportation, alternative means should be explored (i.e. family member or friend). The injured person will not be allowed to transport him or herself unattended.
2. Escort the injured person to a medical facility. Have the injured person sign the treatment memorandum and give it to the doctor to fill out.
 3. Preserve the accident scene for an accident investigation.
 4. Phone senior management and report the circumstances.
 5. The supervisor must investigate the accident and report in writing. Senior management may however elect to follow-up with a professional investigation. The initial investigation should be completed within twenty-four hours.
 6. Follow-up attention on the injured person's progress, the WSIB claim status and to rapid-re-employment (modified duties) should be performed.
 7. Therefore, any first aid treatment which becomes a medical situation must be reported by the injured to his/hers foreman or head office immediately so the proper WSIB forms can be processed.

POLICY FOR TRANSPORTATION OF INJURED WORKERS

J.J. MCGUIRE GENERAL CONTRACTORS INC. will provide transportation to the hospital, doctor's office or worker's home when necessary, following an injury or illness. The preferred method of transportation, if required, is an ambulance. Should this method of transportation not be appropriate then the company will designate a management personal to transport the injured worker to the selected medical provider.

Should the employee refuse the transportation, the company will attempt to:

1. Identify any other transportation methods that the worker would prefer.
2. Reiterate the importance of accepting the transportation to the hospital, doctor's office or workers home.
3. Call 911 and get the ambulance attendant to administer medical attention on site.
4. Employee's will not be allowed to continue work until medical clearance is provided.

Responsibilities of the individual traveling with the injured worker:

1. Continue to administer first aid, if required.
2. Ensure a Treatment Memorandum (TAB Q) is provided and taken to the medical facility.
3. Maintain contact with the company providing updates when the worker has reached their destination (hospital, doctor's office or the worker's home).
4. Return to the company to provide additional follow-up and assist in the completion of the injury / incident documentation.
5. Additional duties may be added based on each individual circumstance

Notes:

- Under no circumstances is a Superintendent to allow a worker who sustains a workplace injury to transport themselves to a medical facility or their residence.
 - If the injured worker has reservations about receiving Medical treatment, is nervous and/or does not speak English fluently, a co-worker who speaks the injured worker's native language and English must be sent with the injured worker to the medical facility.
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11.5 EMERGENCY RESPONSE PROCEDURES FOR CRITICAL INJURIES OR FATALITIES

1. Assess the situation calmly and take command.
2. Protect the accident scene from further hazards, such as fire, live wires, traffic, operating machinery, etc.
3. Provide first aid to the injured, if any, as soon as possible and keep the injured party warm.
4. Arrange for immediate medical help:
Call the ambulance at 911
Call the police at 911
5. Call the corporate head office at **(905) 436-2554**, and advise senior management so they can contact the ministry of labour immediately and notify the injured person(s) relatives.
6. Notify the safety representative/safety committee and local union office (if applicable).
7. Have someone meet and direct the ambulance to the accident scene.
8. For follow-up purposes, find out which hospital the injured will be taken to and have someone there.
9. Isolate the accident scene by barricade, rope, caution tape, etc., and post a guard to make sure nothing is tampered with until the authorities arrive on the scene and all investigations are completed.
10. Co-operate fully with all emergency response crews and ministry of labour personnel.

Note:

Once the injured worker has been effectively looked after and the authorities informed, the site supervisor or his/her competent replacement should begin their own investigation and obtain witness statements without disturbing the accident scene or interfering with the ministry of labour's own investigation.

11.5.1 CRITICAL INJURIES DEFINED

For the purpose of the occupational health and safety act and its regulations, "critical injury" means an injury of a serious nature that:

1. Places life in jeopardy.
2. Produces unconsciousness.
3. Results in substantial loss of blood.
4. Involves the amputation of a leg, arm, hand, or foot but not a finger or a toe.
5. Involves the fracture of a leg, arm, hand, or foot but not a finger or a toe.
6. Consists of burns to a major portion of the body.
7. Causes loss of sight in an eye.

Preservation of the accident scene

Where a person is critically injured at the workplace, no person shall, except for the purposes of:

- A) Saving life or relieving human suffering;
- B) Maintaining an essential public service or a public transportation system;
- C) Preventing unnecessary damage to equipment or other property;

Interfere with, disturb, destroy, alter or carry away any wreckage, article or thing at the scene of or connected with the occurrence until permission to do so has been given by an inspector of the Ministry of Labour.

11.6 REPORTING A CRITICAL INJURY TO THE AUTHORITIES

MANAGEMENT RESPONSIBILITIES:

Where a person is killed or critically injured from any cause at a workplace, the constructor if any, and the employer shall notify an inspector from the MINISTRY OF LABOUR (MOL), in addition to the safety committee, health and safety representative and trade union, if any, immediately of the occurrence by telephone, telegram, or other direct means and the employer shall within forty-eight hours after the occurrence, send to the director (MINISTRY OF LABOUR), a written report of the circumstances of the occurrence containing such information and particulars as the regulations may prescribe.

THE REPORT SHALL INCLUDE THE FOLLOWING:

1. Name and address of the employer and constructor.
2. The nature and circumstances of the occurrence and a description of the bodily injury sustained.
3. A description of the equipment and/or machinery involved.
4. The time and place of the occurrence.
5. The name and address of all witnesses to the occurrence.
6. The name and address of the person who was critically injured.
7. The name and address of the physician or surgeon, if any, by whom the person was or is being attended of the injury.
8. The steps taken to prevent a recurrence.

Important: *contact the authorities:*

- A) Immediately by telephone, facsimile, etc. And
- B) Provide a written report of occurrence to the ministry of labour within forty-eight (48) hours.

12.0 CARE AND REHABILITATION OF WORKERS / RAPID RE-EMPLOYMENT PROGRAM:

J.J. McGuire General Contractors' involvement in the Rapid Re-Employment Policy using the WSIB Procedures and Policy as a guideline outlines in the clearest possible manner the requirements and obligation of J.J. McGuire General Contractors and the Superintendent to ensure that this program is effective in returning the worker to the pre-incident job position, or to modified or rehabilitative job duties.

We will respond to all concerns and conditions for the safety of our workers and the safe conditions and practices on our work sites are of the highest priority. Every reasonable precaution shall be taken to provide such an environment.

Procedure Responsibilities

Health and Safety Coordinator Responsibilities:

- Communicate with the WSIB relating to the Rapid Re-Employment Policy process and existing claims.
- Maintain all documentation related to the injury, WSIB, modified work, and recovery progress.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Cooperate with the Rapid Re-Employment Policy and worker restrictions as required.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Arrange for suitable Modified Work
- Assist Superintendent and the Health and Safety Coordinator in developing / offering suitable Modified Work.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Follow-up on the findings and implement recommendations for each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
 - Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
 - Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
-

Workers Responsibilities:

- Participate in the Rapid Re-Employment Policy diligently.
- Obtain Functional Abilities information at each Health Care Practitioner's visit related to the work related injury.
- Provide all Rapid Re-Employment Policy documentation provided by the Health Care Practitioner to you Foreman or Superintendent.
- Advise Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

12.1 MONITORING THE INJURED WORKER:

To promote the care and rehabilitation of our injured, it is essential that the best medical care and response be available of each project. It is the responsibility of Management to ensure

- Each is provided with adequate First Aid facilities and qualified (trained) First Aid personnel, consistent with their scope of work
- Follow-up attention and rehabilitation of injured workers is critical to a good safety program.
- Perform these activities, and encourages others to do likewise.
- The Project superintendent or his/her competent replacement continues to be responsible to any injured employee and is expected to keep in contact with the injured worker, monitor his/her recovery and as soon as the worker is able, accept the worker back on the work site.
- Monitor the injured worker's recovery process through medical progress reports, discussions with the doctors and adjudicators of the WSIB, and others, in an effort to ensure the worker's earliest possible return.
- Management supports rapid re-employment measures and will implement them when possible.

12.2 RAPID RE-EMPLOYMENT PROGRAM - [Modified work and Vocational Rehabilitation]

This program is designed to reduce the effects of a work-related accident or illness. Its success depends on communication and the worker's return to the pre-incident job position or to a "modified or "rehabilitative" job is the only measure of success.

J.J. MCGUIRE GENERAL CONTRACTORS INC. POLICY AND INVOLVEMENT:

It is a company policy to become involved in the worker's accident from the very beginning. Once the worker has been attended to medically and all aspects of the accident investigation has been completed, the employer should consult with the medical practitioner regarding the injured worker's ability to participate in management's offer of light duties, modified work or his/her pre-incident job duties.

Management personnel shall ensure the injured worker that the rehabilitative job will not be a health or safety risk for the worker. The worker may be anxious about his/her condition and can be legitimately concerned that the return to work will cause his/her condition to get

worse. We must respond to these concerns for the rapid re-employment program to be successful.

PROCEDURES TO FOLLOW:

STEP ONE – CALL THE WORKER!

First collect the information you need to prepare for the worker's return. Contact the worker or the worker's family as quickly as possible. Concentrate on establishing a good relationship with the worker and the worker's family by offering assistance and information. Unless it is impossible for the worker to return to work, contact the worker regularly. Try the following steps and write down the worker's responses. You should explain to the worker that this information is needed to plan for the worker's return.

1. Contact the worker within 48 hours of the accident.
 2. After the accident has been investigated and the worker has received medical care, phone the worker.
 - a) Show that you care about the worker by offering assistance:
 - how you are feeling?
 - is there anything we can do for you?
 - b) Make sure the worker understands the policy on sick and injured workers by explaining:
 - your commitment to keep the workplace safe and healthy
 - availability of a rehabilitative job if the worker cannot do the same job
 - your responsibility to help the worker return to work
 - your commitment to treat all workers with dignity, respect and compassion - explain the goals, procedures and benefits of the rehabilitative job.
 - c) Ask what the doctor called the worker's medical problem or condition.
 - d) Ask how long the doctor thinks the worker will be unable to work.
 - e) Ask if the doctor said the worker could return to the pre-incident job or if the job should be changed in some way.
 - f) If the worker cannot return to the pre-incident job, ask if the doctor will fill in a treatment rehabilitative work form so you can tailor a job to the worker's conditions. A functional abilities form should also be filled out to aid in determining our modified duties for the worker.
 - g) Ask if the worker believes he or she can return to the pre-incident job.
 - Now? – skip to "(i)"
 - On _____ (Skip to "(i)")
 - Never – (Explain rehabilitative work)
 - h) Ask when the worker believes he or she can return to a rehabilitative job?
 - Now? – (Skip to "(i)")
-

- On _____ (Skip to “(i)”)
 - Never – refer to example 5 in Step 2, if worker cannot return to work.
- i) Repeat your commitment to help the worker return to work. Let the worker know that everyone wishes the worker a speedy and lasting recovery.
- j) Ask for a convenient time to call back in the next two days, unless the worker can return to work within one or two days.

The main purposes of this contact are to open the lines of communication and to make sure that both the worker and the doctor are aware of the possibilities of rehabilitative work. Remember: active involvement and support from all parties are necessary to make the worker’s return to work possible.

STEP TWO: HOW TO PROCEED

Review the Employer’s Report of Accidental Injury and Industrial Disease, the Worker’s Statement of Accidental Injury and Industrial Disease and the worker’s responses from questions in Step One, before deciding how to proceed. Some examples of how to proceed are:

1. Worker can return to regular work immediately or within 1 or 2 working days.
2. The worker can return to regular work within 2 to 5 working days.
3. Worker can return to rehabilitative job immediately or within 20 working days.
4. The worker can return to regular work within 20 working days.
5. The worker can return to regular work within 20 or more working days.

You should be prepared to change your approach as more information becomes available or if the worker’s condition changes.

Example 1:

The worker can return to regular work immediately or in 1 to 2 working days.

The Superintendent should meet with the worker when he or she returns to work. Ask how he or she is feeling and go over the work duties. Note the worker’s responses. Do whatever is necessary to help the worker do the job right away.

Meet with the worker again during the second half of the shift. Ask again how the worker is feeling and whether the worker is having difficulty. Note the worker’s responses.

Continue to follow up with the worker daily, then weekly, until full recovery.

Example 2:

The worker can return to regular work in 2 to 5 days.

If the worker is expected to return to the pre-incident job, phone the worker the day before the scheduled return. Ask the following questions and note the responses. Compare them to the worker’s responses in Step 1.

1. Do you feel better?
 2. Are you coming back to your regular duties tomorrow?
-

3. Do you need any assistance from me or from your co-workers?
4. When are you planning to see your doctor again? _____

Advise the worker of your desire to protect the worker's health and safety, and caution the worker to take care not to make the medical condition worse.

One the day of the worker's return, meet with the worker at the start of his or her shift. Ask again how the worker is feeling and repeat your offer of assistance.

Comment: If worker is having difficulty during the shift, go over the worker's difficulties in detail. You can suggest that the worker go home and return the next day.

Meet with the worker at the end of the shift. Repeat questions 1 or 4 and take note of the worker's responses. Again, suggest the worker be careful not to make the medical condition worse. Ask the worker to call you immediately if he or she cannot return to work the next day.

Comment: If the worker cannot return to work the next day, repeat Step 1.

Meet with the worker every day for the next week and review the above questions. Continue to follow the worker's condition until the worker has completely recovered.

Example 3

Worker can return to a rehabilitative job immediately or within 20 working days.

If the worker can return to a rehabilitative job, everyone should work toward creating a job that fits the worker's abilities. This means meeting with the worker to determine those abilities and then developing an appropriate job. In some situations, you or the worker might check with the worker's doctor that the position is appropriate before starting it. That way, you can offer more suitable, less risky work instead of delaying the worker's return.

MEETING WITH THE WORKER:

When you meet with the worker to discuss creating a rehabilitative job, the two of you should prepare a Physical Abilities Analysis. This is the worker's description of his or her capacity for work, for example, the ability to walk, stand or lift. You can compare this analysis to the Physical Demands Analysis for the rehabilitative job to see if it is suitable.

You and the worker should agree on:

- a) the type of rehabilitative work and the conditions of the workplace.
- b) how long the rehabilitative job will last (for example, three days, ten days)

Write out a description of the rehabilitative job and attach the Physical Demands Analysis. Note the date and time of your meeting and include the following statement:

"_____ and "_____ agree to the rehabilitative job assignment for the term noted." (Insert your name and the worker's.)

WHEN THE WORKER IS READY TO RETURN:

One the day before the return to work, phone the worker. Note the worker's responses to the following:

1. Are you feeling well enough to start your rehabilitative job?
2. Have you seen your doctor since we met?
3. Has your doctor said you can start the rehabilitative job?
4. Can you get a note from your doctor that says you can start the rehabilitative job? (The employer pays for this if necessary.)
5. is there anything we should do before you return to work? (For example, are there any temporary physical problems? Do you need a back support for your chair?)
6. Can you work your regular hours?
7. How can we arrange your hours to make this job possible (for example, chiropractor or physiotherapy appointments during work hours, etc.)?

Let the worker know that everyone is pleased he or she is returning.

Confirm with the worker's supervisor that the worker will return. The supervisor can arrange a time to greet the worker. If the supervisor is not available, he or she can write a short note welcoming the worker back.

POINTS TO COVER

- Discuss the worker's physical restrictions or limitations. What could be changed to make it possible for the worker to return to the pre-incident job?
- If the worker cannot return to the pre-incident job, review the Physical Demands Analysis of four rehabilitative jobs. Which is the most suitable job? How long should the worker do the rehabilitative job? Ask the worker for examples of what job he or she thinks is reasonable.

You must write to the doctor for advice on the rehabilitative jobs and the worker's condition, and send a copy to the worker, your director of human resources, the worker's supervisor and the WSIB.

Make sure the worker sees the doctor as soon as possible.

MANAGEMENT CONSIDERATIONS

The worker must have the opportunity to voice his or her opinion and must agree with any decision made. Take careful notes if the worker objects in any way. Take your time and make sure you understand the cause of the worker's objections.

COMMENT: The worker might be finding it difficult to adjust to his or her medical condition.

If the rehabilitative job is permanent or for an extended period of time, you must consider the appropriate level of wages. The goal is always that the worker returns to a position that pays the same as the pre-incident one.

However, if the rehabilitative job pays less and you pay the lower rate, the worker is paid the difference by the WSIB. This means the goal of Rapid Re-Employment Program is not fully achieved.

Discuss what can be done to help the worker return to work. Contact the WSIB or your Vocational Rehabilitative caseworker for advice.

- If no rehabilitative job can be agreed on, consider Vocational Rehabilitation such as:
 - training for another job
 - courses to improve job skills (such as, computer training, language training).
 - counseling (for example, psychological, financial, marital, vocational)
- Discuss who will pay for the Vocational Rehabilitation. The employer should offer to pay if the WSIB will not or if there is a delay. In any case, the cost of paying VR up front is often less than the cost of additional compensation.

IF VOCATIONAL REHABILITATION IS INVOLVED

- Arrange Vocational Rehabilitation to start as soon as possible. Use the WSIB's services whenever possible.
- Meet with the worker weekly to discuss progress, concerns and problems. Go over the suggested return-to-work date and the rehabilitative job.

COMMENT: Let the worker know that everyone is looking forward to his or her return to work as soon as possible.

- At end of the Vocational Rehabilitation plan, meet with the worker to discuss rehabilitative work.

IF THE WORKER CAN NEVER RETURN TO WORK

If a worker feels unable to return to work, verify that feeling.

- Does the doctor support the worker's opinion?
- Does the WSIB support the worker's opinion?
- Do you support the worker's opinion?
- Is there no possible rehabilitative job?

If the answer is yes to these questions, it is unlikely that the worker will return to work

Your new goal at this point, is to work with the WSIB and the worker in finding him a new job. This can be a temporary rehabilitative job while the worker recovers, until he or she can return to work.

Consult the Vocational Rehabilitative caseworker and, if possible, a private consultant who specializes in job placement.

Regardless of the outcome, because of the effect that rapid re-employment has on the worker's FEL (future economic loss) reviews; you should keep in touch with the worker for six years from the date of the incident. You must do everything possible to see that

the worker is employed. Perhaps the condition has changed or perhaps the worker is now able to return to work.

For the first two years, contact the worker at least monthly. Over the next four years, contact the worker twice a year.

Remember, a worker who is not working with you or another employer can receive WSIB benefits that are included in your Accident Cost Statement.

Always make sure that the WSIB is also doing everything possible to assist you worker. Keep in touch with the WSIB on a weekly or monthly basis.

12.3 WORKER SUBSTANCE ABUSE PROGRAM:

It is the policy to assist any employee in dealing with substance abuse [drugs or alcohol]. We recognize the inherent dangers to other workers who have to work with a worker who is impaired through substance abuse, as well as the personal problems associated with the substance abuser.

All Foreman and work Superintendents are to keep a watchful eye of any signs or symptoms associated with possible substance abuse by workers on our work sites. Workers suspected of being impaired shall not be allowed to continue working but rather shall be interviewed at the site office / trailer and if necessary, escorted back home for his/her personal safety. Our company management will follow these procedures:

- a. The Superintendent will discuss the situation with the all parties involved including the Joint Health and Safety Co-chair members where applicable. These people will talk and assess the problem. Where the party involved determines that the employee is unfit of work, the employee should be taken home and an Accident/Incident Investigation Report (TAB P) will be completed. Follow up action including progressive disciplinary Action will be records as requires.

13.0 FIRST AID & MEDICAL TREATMENT REQUIREMENTS:

PURPOSE

Through prompt treatment by First-Aid Trained personnel, pain and suffering endured by injured workers may be minimized and where required, injured workers will be provided appropriate and timely care. Provisions for first-aid are a legislative requirement under Regulation 1101 and the Workplace Safety Insurance Act (WSIA).

13.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Ensure adequate and appropriate first aid stations in the workplace are available.
 - Ensure that trained first aid responders are readily available during working hours for the number of workers within the workplace.
 - Comply with all the requirements as defined under the WSIA Regulation 1101, Occupational Health and Safety Act and Regulations.
-

- Assist in developing corporate health and safety documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported

Senior Management Responsibilities:

- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace;

Project Manager Responsibilities:

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Coordinate with Foreman that adequate first aid stations and supplies are available in the workplace.
- Ensure that competent first aid responders are readily available during working hours for the number of workers within the workplace.
- Ensure there is an effective means of communication between first aid attendants, the workers and a means to summon outside assistance.
- Ensure first aid kits are supplied to each site and inspected for appropriate contents as required.
- Assist in the follow-up on the correction of each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Maintain a first aid station in the workplace.
- Ensure records of the first aid treatment/advice given to the worker are recorded on the First Aid Record Book (TAB M).
- Apply First Aid if trained to do so.
- Ensure, where reasonably possible, that every Subtrade, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of;
- Take every precaution reasonable in the circumstances for the protection of a worker.

Workers Responsibilities:

- Seek first aid right away from a trained first aid responder if needed.
- Ensure accurate record of first aid treatment is recorded on the First Aid Log.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any injuries or contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

13.2 FIRST AID PROCEDURE

Annually, the health and safety legislative requirements for First-Aid – WSIA Regulation 1101 – will be reviewed and it will be determined if compliance is met within the company. When required, arrangements will be made to ensure that an adequate amount of staff have current Standard First-Aid Training. The requirements for first-aid kits will be determined for the office, and site personnel.

All first aid Kits will be equipped with a First Aid Kit Inspection Checklist (TAB OO), First-Aid Manual and a Treatment Form.

Each First Aid Kit Inspection shall be inspected using Checklist on a monthly basis. This inspection shall be completed by the Foreman or a competent designate.

Our Workers and Foreman will be instructed to report injuries immediately and seek the assistance of a First-Aid Trained person when they are injured in the workplace. The First-Aiders will document the treatment provided on the Treatment Form.

13.3 FIRST AID SUPPLY REQUIREMENTS:

Every project must possess the proper first aid kit and supplies. The required contents of the kit are defined by the FIRST AID REGULATIONS (1101) of the WSIB according to the size of the workforce at the particular project. Also defined is the size and contents of the room designated at the First Aid Station. Stretchers, cots, running water, sterilized instruments and the qualifications of the person in charge of such a facility, in accordance to the *size of the workforce* on site and the proximity to the nearest medical facility.

In all cases, the employer must post a form 82 - " IN ALL CASES OF INJURY ", in accordance to the WSIB First Aid Regulations 1101, which is available from the WSIB, on every construction project and its first aid stations. This form outlines the responsibilities and obligations of both the worker and employer, when an injury occurs at the work site.

13.4 FIRST AID TREATMENT RECORDS:

Whenever first aid is administered on the work site, a record must be made in the First Aid Record Book (TAB M). The record must indicate the name of the worker, the nature of the injury, date/time of occurrence, date/time injury/illness was reported, date/time of treatment, nature of treatment rendered and the name of the person rendering the treatment. This is a confidential document and must be treated as such. Once the record book has been filled, or the project completed, the record must be forwarded to the company office management of filing.

13.5 FIRST AID CERTIFICATION:

It is a company policy that each Project Superintendent or his competent replacement possesses first aid training and certification as documented on our Training Matrix. Where the Project Superintendent or his competent replacement does not possess this certification or where the certification has expired, the Project Superintendent or his/her competent replacement shall be responsible to ensure that one or more qualified first aid attendants (workers) are employed at the work site. Unless otherwise instructed, *each Subtrade company* shall provide their own first aid equipment and trained first aid attendants (workers) as per the WSIB First Aid Regulations, which require all employers to provide first aid coverage.

13.6 MEDICAL TREATMENT:

In the event First Aid is insufficient to treat the injuries of an injured worker and the worker requires the services of a Physician, the Project superintendent or his/her competent replacement must assure that the injured worker signs the Treatment Memorandum Form (TAB Q) and that the attending Physician receives a copy of the signed form.

This treatment memorandum permits the doctor to release information to a company representative regarding the worker's condition, as well as giving a written account of the nature of the worker's injuries. The doctor also has the option to return the worker to modified duties of a specified period of time as our treatment memorandum relates to the doctor that those duties are generally available. It is the Project superintendent or his/her competent replacement's responsibility to try to accommodate the injured worker's restrictions as prescribed by the attending Physician.

Please ensure the worker signs in the upper right hand corner of the Treatment Memorandum Form (TAB Q), *before* he/she leaves the site to visit the doctor. A copy of the signed form should be transmitted to the Workers Compensation Board for their records.

It is in the best interest of each party that the worker is accompanied to the medical facility by a project management member to inform the doctor of our modified duty options and to be briefed on the worker's condition.

14.0 TRADE SUBTRADE GUIDELINES TO OUR SAFETY PROGRAM:

The J.J. MCGUIRE GENERAL CONTRACTORS INC. contractual commitment with Subtrades and other vendors, suppliers or service firms engaged at the work site requires their active participation in our site safety program and adherence to the rules and procedures as set out in this safety policy.

The Employment Guidelines will be used to convey minimum health and safety requirements that must be followed by all Subtrades performing work on our projects. This document provides a baseline of requirements that will help us ensure that Subtrades and their worker's, Subtrades and visitors have guidelines and requirements that they are contracted to follow. The Employment Guidelines includes specific Safe Work Practices responsibilities for our personnel as well.

All management staff, workers and/or Subtrades must regard the Employment Guidelines as a directive for compliance with the Health and Safety Program and the minimum legislative health and safety requirements.

14.1 RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Review workplace specific requirements under the Employment Guidelines.
- Assist in the completion of Jobsite Orientation Form (TAB QQ).
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety policies and procedures.

Senior Management Responsibilities:

- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace;

Project Manager Responsibilities:

- Work with management team to define workplace specific requirements under the Employment Guidelines.
- Review Subtrade documents to ensure all Subtrades can implement their workplace specific requirements and the site specific expectations under the Employment Guidelines.
- Approve and set workplace requirements under the Employment Guidelines.
- Assist in the completion of Jobsite Orientation Form (TAB QQ).
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Assist in the completion of Jobsite Orientation Form (TAB QQ) documented the completion of the Employment Guidelines.
- Follow-up on the findings and implement recommendations for each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure communication and enforcement of the project specific and workplace requirements as defined under the Employment Guidelines.
-

- Ensure, where reasonably possible, that every Subtrade, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations;

Workers Responsibilities:

- Works in the manner and with the protective devices, measures and procedures required by the Employment Guidelines, Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

14.2 SUBCONTRACTOR MONITORING PROCEDURE

Trade Subtrade companies shall only start work when J.J. MCGUIRE GENERAL CONTRACTORS INC. is in receipt of the Jobsite Orientation Form (**TAB QQ**), (included with these Employment Guidelines) which is to be signed by the management representative of the Subtrade. The trade Subtrade shall ensure that any Subtrades, suppliers or persons working on their behalf, are provided with a copy of these Trade Subtrade Guidelines and policy/site requirements.

The Employment Guidelines include our corporate health and safety rules to assist them in reducing accidents and incidents, and in complying with Employment Guidelines. Also in addition to the trade Subtrade signing off on the Jobsite Orientation Form (**TAB QQ**).

Additionally, the trade Subtrade shall also sign off on the J.J. MCGUIRE GENERAL CONTRACTORS INC.– Subtrade Health and Safety Agreement as part of the Employment Guidelines before commencement of work on any of our projects.

TRADE SUBTRADES PROVISION OF DOCUMENTATION:

The trade Subtrade shall provide to J.J. MCGUIRE GENERAL CONTRACTORS INC. any or all of the following:

- Copy of valid WSIB Clearance Certificate and CAD 7. *Note: That ALL Subtrades WSIB CAD 7 will be reviewed carefully before hiring all subtrades.*
 - Employment Guidelines
 - Copy of their health and safety policy and procedures.
 - Declaration of supervisor competency for crew supervisors placed on our projects, (Tab Y).
 - Any engineered stamp and signed design drawings and specifications of equipment or structures
 - Any licenses or permits, log books and operator manuals of equipment and operators.
 - All documents required by Ontario's Occupational Health & Safety Act and Regulations.
 - Written safe work procedures as required [eg. Working at Heights Plan]
 - Copies of Material Safety Data Sheets and proof of worker WHMIS training and H&S Awareness in 4 Steps.
-

The trade Subtrade shall maintain copies of all documentation required to be kept on the work site, in accordance to applicable legislation, prior to the commencement of work and the arrival of material/equipment arriving on site. This includes but is not limited to the above.

NOTIFICATION OF NEAR MISSES, INCIDENTS OR ACCIDENTS:

- Trade Subtrades, their employer, supervisors or workers are required to report all incidents, accidents or near misses to the J.J. MCGUIRE GENERAL CONTRACTORS INC. site superintendent as attached.
- J.J. MCGUIRE will participate in Subtrade investigation and all information will be passed on to Owner/ Client by J.J. MCGUIRE as necessary including all incidents which initiated our investigation process.
- Submit copies of documentation required by provisions of Occupational Health and Safety Act, of reporting accidents, incidents and injuries to the authorities shall be submitted to the governing authorities and J.J. MCGUIRE GENERAL CONTRACTORS INC. for review. In cases of accidents resulting in Critical Injuries, the trade Subtrade shall ensure the accident scene is not disturbed except for the purposes of:
 - Saving life or relieving human suffering;
 - maintaining an essential public utility service or public transportation system, or;
 - preventing unnecessary damage to equipment or other property

INVESTIGATING AND REPORTING PROCEDURES:

All trade Subtrades must conduct a full investigation of any accident or incident causing personal injury or property loss. The investigation should identify the events leading to the accident, incident or near miss, along with the root causes, witness statements, related information and measures to be taken to prevent a recurrence.

Trade Subtrades are to ensure the J.J. MCGUIRE GENERAL CONTRACTORS INC. are directly contacted and that the proper authorities are notified. The Subtrade must ensure the appropriate reporting forms are submitted within the prescribed time restraints as set out in legislation to allow for all information to be passed on to Owner/ Client by J.J. MCGUIRE as required.

J.J. MCGUIRE GENERAL CONTRACTORS INC. requires to be notified within twenty-four hours of any claim made by anyone against the Constructor or a trade Subtrade of any accident, incident or material or property damage.

ENSURING COMPLIANCE ON OUR WORK SITES:

Trade Subtrades will be held accountable to their obligations to ensure compliance to all provisions of Ontario's Health and Safety Act and its Regulations of Construction Projects, and to our own Corporate Health and Safety Policy requirements and rulings.

Trade Subtrades are required to enforce the above in addition to ensuring safe work practices and work site conditions prevail on our projects as part of the Employment Guidelines. In accordance to the J.J. MCGUIRE GENERAL CONTRACTORS INC.-

Employment Guidelines, penalties may be assessed against the trade Subtrade of non-compliance behavior of their employers, employees and suppliers.

Any remedial action having to be taken by J.J. MCGUIRE GENERAL CONTRACTORS INC. for any reason, to correct trade Subtrade work site conditions or neglect, and other reasons as per our agreement, such costs incurred by J.J. MCGUIRE GENERAL CONTRACTORS INC. shall be back charged to the trade Subtrade.

TRADE SUBTRADE PERFORMANCE REVIEW:

An evaluation of any trade Subtrade on our projects must be conducted to be determined at intermittent stages of their contract and an overall rating assessed. Such assessments will be forwarded to J.J. MCGUIRE GENERAL CONTRACTORS INC. management for record and review. Trade Subtrades exhibiting poor ratings may not become eligible of future contract bid considerations.

SUMMATION:

The corporate health and safety rulings below are meant as a guide to establishing safe work practices and conditions. They are not all inclusive. Subtrades are advised to refer to the provisions of the Ontario statutes (legislation) and industry standards of further guidance.

15.0 CORPORATE HEALTH AND SAFETY RULES AND SAFE WORK PRACTICES

It is the policy of J.J. MCGUIRE GENERAL CONTRACTORS INC. to insist that all Subtrades, their employers and employees, and our direct workforce, understand and strictly adhere to the provisions of the Occupational Health and Safety Act of Construction Projects and its regulations.

This will be accomplished by providing every company employee with the specific Safe Work Practices and health and safety expectations prior to commencing their employment obligations as part of our Employment Guidelines Package.

15.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Develop the Corporate Rules and Safe Work Practices as part of our health and safety orientation documentation, policies and procedures as part of our Employment Guidelines Package.
 - Coordinate the communication and confirmation of the Employment Guidelines.
 - Maintain all documentation related to the employee guidelines and orientation progress.
 - Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
-

- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Approve the corporate health and safety orientation documentation, policies and procedures as part of our Employment Guidelines Package.
- Ensure all company employees receive the appropriate training and workplace specific overviews as part of our Employment Guidelines Package.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Provide and records site orientation to all Subtrades using our Employment Guidelines Package.
- Review findings with each Foreman to ensure that corrective measures are taken.
- Follow-up on the findings and implement recommendations for each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure, where reasonably possible, that all workplace parties complies with all Occupational Health and Safety Act and Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.

Workers Responsibilities:

- Provide sign-off and documentation from the Corporate Rules and Safe Work Practices as part of our Employment Guidelines Package.
 - Advise Superintendent if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
-

- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device;

15.2 CORPORATE RULES AND SAFE WORK PRACTICES PROCEDURE

The following appropriate Corporate Rules and Safe Work Practices (SWP) will be developed and implemented by the **Health and Safety Coordinator** and approved by **Senior Management** detailing both Construction, Industrial and Office level workplace specific requirements as part of our Employment Guidelines Package. These will be held as a guidance document describing the minimum health and safety expectations needed to work within the workplace.

The appropriate Corporate Rules and Safe Work Practices (SWP) will be reviewed by all workplace parties prior to their commencement of work. This training will be documented by each employee by completing the acknowledgment sign-off sheets at the end of the package to demonstrate all the information has been received, read and understood by the employee.

Below, are the some of the most fundamental of are Corporate Safety Rules and Safe Work Practices (SWP). Know them and adhere to them. Your foreman or project superintendent or competent his/her competent replacement, will inform you of any additional safety rules and procedures, governed by the corporate policies of the owner of our projects.

The project foreman, or superintendent, or competent replacement will supply protective clothing, equipment or devices "as necessary to protect the worker against hazards to which the worker may be exposed"

It is mandatory to wear CSA approved hardhats and safety boots at all times when working on all J.J. MCGUIRE GENERAL CONTRACTORS INC. projects.

15.3 FALL PROTECTION REQUIREMENTS

WARNING! *No worker shall be exposed to heights greater than three metres when near an unguarded edge to a floor, roof, platform, opening or on a ladder without first providing travel restraint, fall arrest or guardrail protection. Any person found doing so shall be subjected to disciplinary action. Fall protection is also required if a worker may fall into operating machinery, into water or other liquids, into or onto hazardous substances or objects regardless of height. Fall Protection training is mandatory for all workers on site.*

EQUIPMENT STANDARDS AND SET-UP:

All safety belts, full body harnesses and lanyards must be C.S.A. certified and carry a C.S.A. label. Safety harnesses and belts are to be snug-fitting and worn with all hardware and straps intact and properly fastened. Lanyards are to be 5/8" diameter nylon or equivalent. The D-rings on the safety belts should be centered on the person's back. The

lanyard or lifeline and lanyard combination must be secured to a rigid support capable of resisting the peak arrest forces of 1800 lbs. minimum of fall arrest protection purposes and its length should be adjusted so the wearer will be prevented from falling no greater than 1.5 meters from where he stands. When the lifeline consists of wire rope, or the connecting lanyard consists of nylon webbing, a shock-absorbing lanyard shall be used. All fall protection equipment must be inspected before each use. If a component is found to be defective it will be immediately taken out of service.

LIFELINES AND THEIR SET-UP:

All lifelines shall be:

- 16 millimeters (5/8") diameter polypropylene or equivalent.
- used only by one worker at a time.
- free of any cuts, abrasions, other defects and protected against chaffing.
- long enough to reach the ground or be knotted at the end.
- connected at right angles to the worker's position.
- provided with a rope grab (cam lever) device of lanyard attachment.

FALL PROTECTION SYSTEMS

FALL RESTRICTION SYSTEM: (definition)

This consists of an assembly of components that is attached to an adequate fixed support on the project and is designed and arranged in accordance with the manufacturer's instructions, so that a worker's fall distance does not exceed 0.6 metres [2 feet].

FALL ARREST PROTECTION: (definition)

This consists of a shock absorbing lanyard or lifeline/lanyard set-up where the wearer is allowed some movement at an unguarded edge and if he should trip or lose his balance he could possibly fall over this edge. This fall protection system should be adjusted so as to limit the wearer's fall to within 1.5 meters from where he stands or sits and only full body safety harnesses with a shock absorber / lanyard device shall be used for his protection.

TRAVEL RESTRAINT SYSTEM: (definition)

Travel restraint protection consists of a lanyard or lifeline/lanyard set-up, which restrains the wearer travel from placing himself at an unguarded edge. Because the worker's travel is restricted, should the worker lose his balance he will not fall over the edge. This is the only situation where a waist type safety belt is being allowed. Full body harnesses however are preferred.

GUARDRAIL PROTECTION:

Guardrails consisting of a top rail, middle rail and toe board must be provided around work platforms, ramps, and open areas where a worker can fall from one level to another. Temporary removal of a guardrail by workers in order to perform work, will require the worker(s) to protect themselves by use of either travel restraint or fall arrest protection methods and take appropriate measures to cordon off the work area and post signs warn others to stay clear. The guard railing must be re-installed once the work is completed. Guard railing will be required around the exposed edges of all scaffold work platforms over eight feet in height. This includes the open ends of outrigger drop platforms.

COVERINGS OVER OPENINGS:

It is generally expected that openings are to be guard railed if at all possible. When coverings are required however, planking laid tightly side by side shall be the material of choice, or such material suitable to support and resist all anticipated loads. All coverings must be securely fastened and marked ["DANGER-OPENING – DO NOT REMOVE"], to prevent accidental removal. At times planked platforms, due to their layout arrangement will create openings, which will require securely attached coverings

WORKING OFF LADDERS:

Workers up higher than three metres on a ladder, or higher than and in close proximity to a guard railing, must wear, set-up and use fall arrest protection. There is a risk the worker could fall off the ladder and over the adjacent guard railing. Workers must lock step ladder braces in place and stay off its the top rung or shelf. If heavy exertion or body extension is a consideration, scaffold or other work platforms should be used. Do not use step ladders to mount or dismount from or to work surfaces. Use of secures lean-to ladder instead.

EMERGENCY RETRIEVAL PROCEDURES FOR REMOVAL OF A WORKER(S) SUSPENDED ON A FALL ARREST SYSTEM

In the event a worker falls and is arrested by his/her fall arrest lifeline and/or lanyard, it is imperative that action be taken to retrieve this worker within fifteen minutes from the time of Suspension. Being suspended for prolonged durations beyond fifteen minutes could cause serious internal injury and stress to the worker. The following aspects of retrieval must be setup.

COMMUNICATIONS:

All workers will be informed of these procedures during site orientation sessions. The crew foreman shall collaborate with the project superintendent in organizing a response procedure. Hand held radios or telephones shall be available so the Foreman can notify the project superintendent of a fall arrest situation.

RETRIEVAL EQUIPMENT:

- 1st Choice - ARTICULATED BOOM LIFTS OR SCISSOR LIFTS
Upon notification, the nearest articulated boom lift or scissor lift will be utilized to rise up from under the suspended worker and land him on the platform.

 - 2nd Choice - LADDERS
In the event that articulated boom lifts or scissor lifts are not available for retrieval, ladders of appropriate length will always be made available to retrieve the suspended worker. At least two workers will be summoned by the crew foreman to assist in placing the ladder in a manner so that the suspended worker can mount the ladder from his suspended position.

 - 3rd Choice - FIRE DEPARTMENT RESCUE
There may be situations where due to location and height, the Fire Department rescue unit may have to be summoned to affect the retrieval of the worker.
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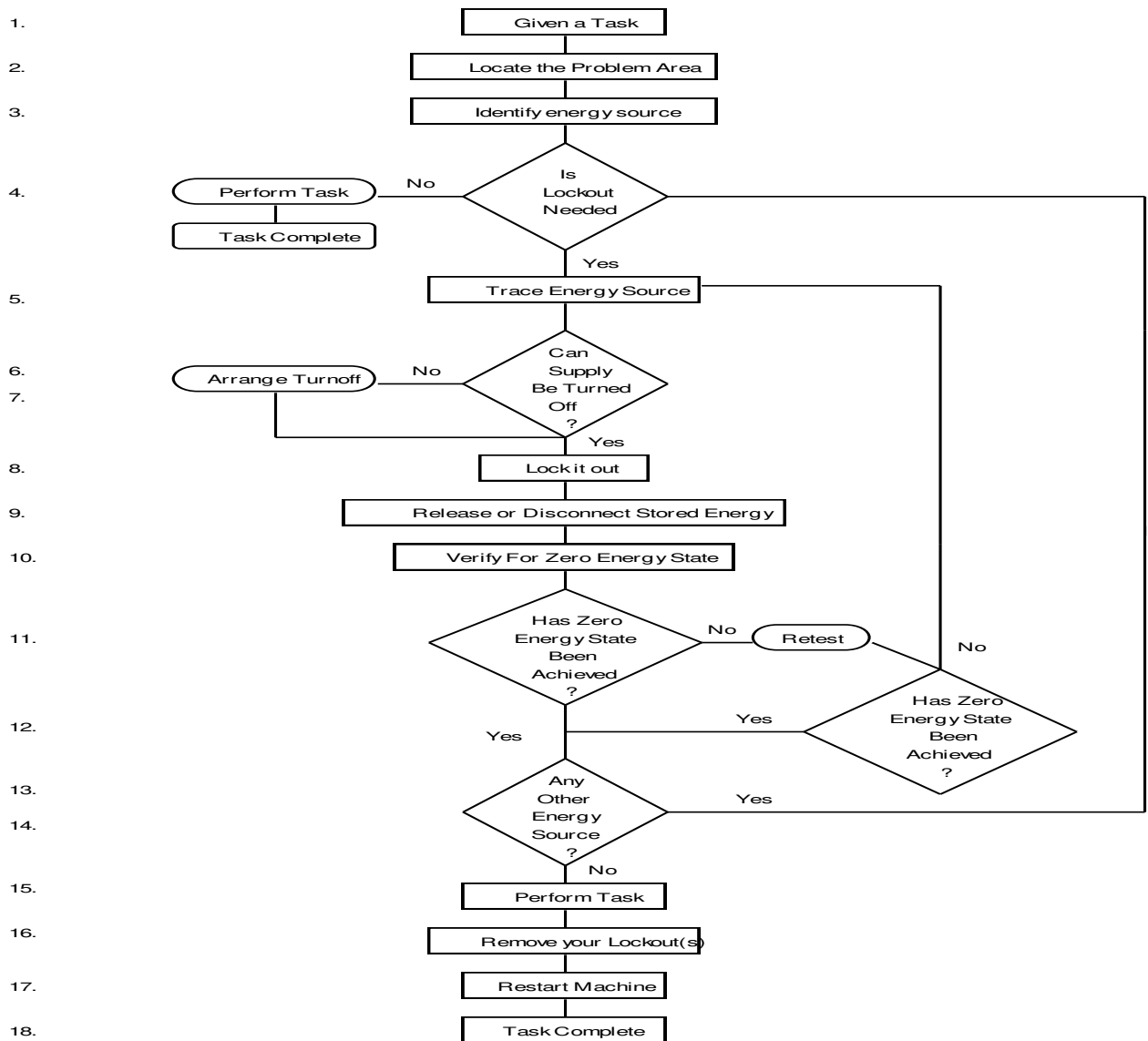
REUSE OF FALL PROTECTION GEAR:

The fall arrest harness and shock absorbing lanyard activated during the fall arrest event, shall be taken out of service and not re-used until inspected and approved for re-use by the manufacturer.

15.4 SCAFFOLDING COMPLIANCE GUIDELINES

1. The Erection, Alteration and Dismantling of Scaffolds Must Be Carried Out Under the Supervision of a Competent Person.
 2. Scaffolds must be supported on solid or compacted surfaces.
 3. Have footings, sills, or supports that are sound, rigid and capable of supporting two times the maximum anticipated load without entitlement or deformation of the scaffold.
 4. Be tied (secured) to the building at vertical intervals, not exceeding times the least lateral dimension of the scaffolding. If this is not possible, guy lines shall be used.
 5. Have all fittings, including foot plates, screw-jack legs, coupler pins, castors, braces, installed in accordance to the manufacturer's instructions and design drawings.
 6. Have all work platforms equipped with guardrails consisting of a top rail, middle rail and toe board. All openings to platforms are to be securely guard railed or covered.
 7. Be provided with secured ladder access to work platforms.
 8. Scaffold platforms shall consist of rough sawn (2" x 10") planking of sound no. 1 grade spruce quality and be secured from slippage by cleating or other means.
 9. Load all cubes of masonry brick directly over framing.
 10. Have clean platforms and grounds, free of ice, snow, oil, debris, and other slippery material to prevent tripping hazards.
 11. Workers shall wear and use full-body harnesses/lanyards attached to the project when erecting or dismantling scaffolding, above three meters in height.
 12. Scaffold platforms must be at least 18 inches wide and if they are over eight feet above the floor base, they must consist of planks laid tightly side by side, the full width of the scaffold frame.
 13. Wheels and castors on rolling scaffolds must be equipped with braking devices on each castor or wheel and have the brakes applied when a worker is on the scaffold.
 14. Set up of standard frame scaffolds over 15 metres (50 feet) in height and tube and clamp system scaffolds 10 metres (30 feet) in height must be designed by a professional engineer and erected as per drawings.
 15. Temporary work platform/scaffold will be inspected by competent person prior to use. A red tag/green tag will be affixed to platform indicating safe to use (green tag) or unsafe to use (red tag).
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15.5 LOCKOUT PROCEDURAL FLOW GRID



EXPLANATION OF LOCK-OUT PROCEDURAL SEQUENCE

All affected employees will be trained in Lock-Out/Tag-Out procedure sequence. The Owner's procedure will take precedence with on-site training.

1. Receive work assignment.
2. Locate the area and identify the equipment or machinery to be worked on.
3. Identify all power sources affecting the equipment or machinery, such as electrical, pneumatic, hydraulic, steam, gravity or momentum.
4. Determine whether lockout is required to perform the work assignment.
5. Locate and identify all power source components on equipment or machinery.
6. Determine whether it is physically possible to lock out each power source.
7. If lockout is required, check with qualified operations personnel before proceeding.
8. Have qualified personnel shut down the equipment or machinery. Install your personal safety lock with tag indicating name, employer, time/date and work location.

9. Any power or product remaining in the equipment or machinery must be discharged or disconnected by qualified personnel.
10. With extreme caution, try to start the equipment or machine manually.
11. Look of any movement or functions.
12. If none observed, try to restart again.
13. Look of any movement or functions.
14. If none observed, confirm that all power sources are at a zero energy state.
15. Carry out work assignment.
16. When work is complete and the area is ready to resume operations; remove all locks, tags, and lockout devices. Check that all personnel are clear of the equipment or machinery.
17. Have qualified personnel restart the equipment or machinery.
18. Assignment complete once equipment or machinery is operating satisfactorily.

Note: Each employee shall be responsible of hanging their own lock and tag on the equipment before starting work. No employee or other Subtrade may remove a lock or tag belonging to another employee. Each employee involved with lockouts shall have his/her own personal lock with & key. No locks with duplicate or master keys shall be used. If more than one employee is required to lockout and tag a circuit or piece of equipment, a multiple padlock device shall be used. Any employee who removes a tag or lock belonging to another employee or person, or overrides a tag or lock in any way, shall be subject to immediate reprimand or termination. Electrical work performed by electrical Subtrades may only be performed by competent/qualified workers. (see also Section 14 Trade Subtrade Guidelines to our Safety Program).

16.0 OCCUPATIONAL HEALTH

Prior to the commencement of work activities, a risk assessment for occupational health hazards shall be performed and controls developed and implemented for identified hazards. Those may include but are not limited to:

Confined Space Entry- Hazard Assessment Rating, Procedures, Worker selection & Training
H2S- Other Dangerous Gases- Procedures, Air Monitoring Equipment, Escape Procedures & Equipment
Hazardous Materials (Silica, etc.)- Inventory Assessment, Abatement by Controlled Workers
Chemical/ Biological Substances- Sharps, Exposure Control Plans, Worker Training & PPE, Spill Kits

16.1 CONFINED SPACE & PROCEDURE RESPONSIBILITIES

The following Program provides an overview of a system to direct owners, constructors, employers, Subtrades, supervisors and workers involved in confined space entry work to work safely. This confined space and safe work procedures, training and equipment must be employed to work in all potential confined space situations.

Health and Safety Coordinator Responsibilities:

- Develop confined space procedures and safe work procedures to define corporate expectations relating to Confined Space work.
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- Schedule and coordinate Confined Space awareness training as required.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety orientation documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Ensure all company employees receive the appropriate training and workplace specific overviews.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Ensure confined space and safe work procedures, training and equipment are procured as required.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Coordinate appropriate Subtrades to perform all Confined Space work as required.
- Review findings with each Foreman to ensure that corrective measures are taken.
- Follow-up on the findings and implement recommendations for each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure, where reasonably possible, that every Subtrade, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
 - Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations;
 - Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of;
 - Take every precaution reasonable in the circumstances for the protection of a worker.
 - Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.
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Workers Responsibilities:

- Advise Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations;
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device;

16.2 PROCEDURE

In general, entry into confined spaces shall be avoided whenever possible. Where possible, work will be conducted by alternate means from outside the space (work from outside the space, use an extender, possibly utilize a robot, etc.).

All potential confined spaces will be identified and assessed by a competent person/ worker who has adequate knowledge, training and experience to perform/ conduct this exercise.

A Confined Space Entry Permit (CSEP) provided by the Subtrade that is to enter or perform work will be completed before (and during) each entry into a confined space. This permit will be reviewed by the Superintendent and must identify/ assess potential hazards, detail duties and responsibilities, identify competent entrants and outline the specific safe work procedures for the work that is to be completed.

Confined Space Procedure (TAB SS) shall be reviewed and completed prior to the commencement of work.

CONFINED SPACE DEFINITION:

“Confined Space” means a fully or partially enclosed space,

- 1) That is not both designed and constructed for continuous human occupancy, and
- 2) In which atmospheric hazards may occur because of its construction, location or contents or because of work that is done in this space.

(access or egress is not the main reason a space is classed as confined)

The above definition may be applied to tanks, vats, sewers, pipes, ducts, flues, reactors, vessels, chambers, boreholes, manholes, vaults or some excavations.

THE SUPERINTENDENT SHALL ENSURE:

1. Subtrades Supervisor(s) must be trained in Confined Space Entry/Awareness before workers enter a confined space, the supervisor will *provide a means of egress* from the parts of the confined space which is accessible to his workers.
 2. The Subtrades supervisor shall ensure that all mechanical equipment in the confined space is *disconnected* from its power source and *locked out* and that all pipes or other supply lines in and to the confined space, whose contents are likely to create a hazard, are *blanked off*.
 3. A *competent* person shall *test and evaluate* the confined space before a worker enters it, to determine whether it is free from hazards to a worker, who will be present in it and as
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often as necessary to ensure that it remains free from hazard.

4. The person who performs the tests *shall certify in writing* whether the confined space may endanger a worker and these test results are to be kept in a permanent record, on site, for review.

NOTE: Regardless of the character of the confined space, this written certification is required unless the conditions listed in item 6 are compiled to:

5. The tests referred to in item 3, shall record and evaluate the content levels of any hazardous gas, vapor, dust, mist, smoke or fume, as well as an oxygen content of less than 18 per cent or more than 23 per cent, measured at atmospheric pressure unless the items a, b, c, & d below, are adhered to:
 - a) the confined space is *purged and ventilated* to provide an atmosphere which does not endanger workers and the *measures necessary to maintain* this atmosphere is taken.
 - b) suitable arrangements shall be made to remove a worker from the confined space should assistance be required.
 - c) when a worker is present in the confined space, another worker shall be stationed outside the confined space who is preferably trained in first aid and knows how to give artificial respiration.
 - d) if the person stationed outside the confined space does not know how to adequately perform artificial respiration, then a person so trained shall be conveniently available.

NOTE: A worker may be present in a confined space that is not purged or ventilated and for which no certificate under item 3 is required if the following conditions in item 6 are compiled to:

CONFINED SPACE WORK PROCEDURES

6. All Subtrades workers who may be required to enter into a Confined Space shall use *suitable protective breathing apparatus* equipment and *full body harnesses* securely attached to a rope;
 - a) whose free end is attached securely to a fixed support located outside the confined space; and
 - b) that is being held by a worker outside the confined space who is equipped with a full body harness and lifeline and is provided with an alarm device to signal an emergency.
 - c) an effective means of communication between a worker in a confined space and the worker outside the confined space shall be provided.

NOTE: The equipment mentioned in item 6, shall be inspected and maintained as often as is necessary to ensure that it is in prime working order.

EXPLOSIVE OR FLAMMABLE ATMOSPHERES:

No Subtrade shall be present in a confined space that contains or is likely to contain an explosive or flammable gas, dust, mist, or vapor except under the conditions as outlined in item 7 below:

7. A Subtrade may engage in *cleaning or inspection* activities that do not create a source of
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ignition in a confined space providing the concentration of explosive or flammable gas, dust, mist or vapor is not likely to exceed *50 per cent of the lower explosive limit* of the gas, dust, mist or vapor.

A Subtrade may engage in *cold work* in a confined space in which the concentration of the explosive or flammable gas, dust, mist or vapor is not likely to exceed *10 per cent of the lower explosive limit* of the gas, dust, mist or vapor.

NOTE: "Cold Work" refers to a work procedure that does not generate heat and does not cause sparks or open flames, explosions or flash fires.

GENERAL PRECAUTIONS

Where air quality tests reveal and it is known through purging and ventilation that no hazardous atmospheric conditions or other hazards exists, but for which a worker will be entering inside the confined space; the worker(s) intending to enter the confined space, shall wear full body harness and an attached lifeline leading out a tender stationed outside.

Communication capabilities between the worker and tender shall be implemented and a warning signal shall be used by tender to warn responsible parties outside the confined space of any problems. The immediate area outside the confined space shall be cordoned off and have danger signs posted. Suitable arrangements and equipment for rescue operations shall be set up and placed on standby. Suitable entry and equipment checklists and permits should be used to ensure all considerations have been addressed.

16.3 CHEMICALS

Hazards involving chemical handling can lead to serious worker injuries, occupational diseases and even death. In particular, workers may be at risk of injuries from chemical flammability/reactivity, contact with corrosive chemicals, asphyxiation hazards or damage to body organs or systems. Workers are at risk of developing occupational diseases, such as contact dermatitis, occupational asthma and occupational cancers. Proper chemical handling prevents these types of injuries and occupational diseases.

J.J. McGUIRE GENERAL CONTRACTORS INC. shall take all necessary measures and procedures by means of training, engineering controls, work practices and hygiene practices to protect worker from exposure to chemical. In addition to the above, where the strict duty cannot be complied with because, an emergency exists, or the measures and procedures necessary to control the exposure of a worker to biological agents do not exist or are unavailable, are not reasonable or practical for the length of time or frequency of exposure or the nature of the process, operation or work, or are not effective because of a temporary breakdown of equipment, the worker shall be provided with personal protective equipment which shall be used by the worker.

An assessment is to be made in writing of the exposure or likelihood of exposure of a worker to the chemicals. Where the assessment discloses that a worker is likely to inhale, ingest, absorb, or inject chemicals and that the health of the worker may be affected, the supervisor shall develop, establish, put into effect and maintain measures and procedures to control the exposure of the worker to chemicals.

As part of the project and job planning, all chemicals shall be identified to all workers on the site. It is not J.J. McGUIRE GENERAL CONTRACTORS INC. intention to complete any handling of chemicals without the review of a Safety Data Sheet (SDS). This procedure is meant to identify the minimums to be considered as part of regular work activities.

16.4 BIOLOGICAL AGENTS

Biological agents include bacteria, viruses, fungi, other microorganisms and their associated toxins. They have the ability to adversely affect human health in a variety of ways, ranging from relatively mild, allergic reactions to serious medical conditions, even death. These organisms are widespread in the natural environment; they are found in water, soil, plants, and animals. Because many microbes reproduce rapidly and require minimal resources for survival, they are a potential danger in a wide variety of occupational settings.

J.J. McGUIRE GENERAL CONTRACTORS INC. shall take all necessary measures and procedures by means of training, engineering controls, work practices and hygiene practices to protect worker from exposure to biological agents. In addition to the above, where the strict duty cannot be complied with because, an emergency exists, or the measures and procedures necessary to control the exposure of a worker to biological agents do not exist or are unavailable, are not reasonable or practical for the length of time or frequency of exposure or the nature of the process, operation or work, or are not effective because of a temporary breakdown of equipment, the worker shall be provided with personal protective equipment which shall be used by the worker.

An assessment is to be made in writing of the exposure or likelihood of exposure of a worker to biological agents Where the assessment discloses that a worker is likely to inhale or ingest, absorb or inject biological agents and that the health of the worker may be affected, the supervisor shall develop, establish, put into effect and maintain measures and procedures to control the exposure of the worker to biological agents.

As part of the project and job planning, any containing material shall be identified to all workers on the site. It is not J.J. McGUIRE GENERAL CONTRACTORS INC. intention to complete any handling of biological agent containing material at any time as this process is left to qualified contractors and should be identified to building and facility owners. This procedure is meant to identify the minimums to be considered as part of regular work activities.

16.5 PHYSICAL AGENTS

NOISE

J.J. McGUIRE GENERAL CONTRACTORS INC. shall inform workers about the dangers of hazardous noise exposure and instruct and supervise workers on the proper use and maintenance of hearing protection when it is required. Identified areas where workers may be exposed to noise levels over 85 decibels for sustained periods will reduce noise levels where possible by using sound barriers, ensuring equipment is maintained or, by other engineering means. Where noise levels cannot be reduced below 85 decibels, appropriate hearing protection will be provided to the workers who are exposed. J.J. McGuire will monitor construction noise intermittently during construction as required and post signage at every approach to an area where the sound level regularly exceeds 85 dBA.

ULTRAVIOLET RADIATION

Excessive exposure to ultraviolet radiation is associated with different types of skin cancer, sunburn, accelerated skin aging, as well as cataracts and other eye diseases. The severity of the effect depends on the wavelength intensity, and duration of exposure. Workers must use eye and skin protection while working with UV radiation sources which present the potential of eye harmful exposure. The selection of eye protection depends on the type and intensity of the UV source.

HOT WORK ENVIRONMENTS

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 (syncope) are also types of heat related illnesses which are not fatal but can interfere with a person's ability to work.

The victims of heat stroke are unable to notice the symptoms when they are happening to themselves, and therefore, their survival depends on co-workers' ability to identify symptoms in others, and to get medical help.

While symptoms can vary from person to person, the warning signs of heat stroke can include complaints of sudden and severe fatigue, nausea, dizziness, light-headedness, and may or may not include sweating. If a co-worker appears to be disorientated or confused (including euphoria), or has unaccountable irritability, malaise or flu-like symptoms, the worker should be moved to a cool location and get medical help immediately.

J.J. McGUIRE GENERAL CONTRACTORS INC. shall take every reasonable precaution to ensure the workplace is safe for the worker. This duty includes taking effective measures to protect workers from heat stress disorders if it is not reasonably practicable to control indoor conditions adequately, or where work is done outdoors. Certain steps will be taken to reduce discomfort in hot work environments. These include:

- using fans or air conditioning
- wearing light, loose fitting clothing
- taking more frequent rest breaks
- drinking cold beverages (ones that do not have caffeine or alcohol)
- allowing flexibility to permit less physically demanding activities during peak temperature periods.
- using screens or umbrellas to create shade

COLD WORK ENVIRONMENTS

At very cold temperatures, the most serious concern is the risk of hypothermia or dangerous overcooling of the body. Another serious effect of cold exposure is frostbite or freezing of the exposed extremities such as fingers, toes, nose and ear lobes. Hypothermia could be fatal in absence of immediate medical attention. Warning signs of hypothermia can include complaints of nausea, fatigue, dizziness, irritability or euphoria. Workers can also experience pain in their extremities (hands, feet, ears, etc), and severe shivering. Workers should be moved to a heated shelter and seek medical advice when appropriate.

J.J. McGUIRE GENERAL CONTRACTORS INC. shall take every reasonable precaution to make sure the workplace is safe for the worker. This duty includes taking effective measures to protect

workers from cold stress disorders if it is not reasonably practicable to control indoor conditions adequately, or when the work is done outdoors.

General recommendations include to:

- Dress in layers of warm clothing, with an outer layer that is wind-resistant.
- Cover all exposed skin.
- Wear a hat, mittens or insulated gloves, a scarf, neck tube or face mask, and insulated, waterproof footwear.
- Stay dry (including taking steps to prevent excess sweating).
- Keep active.
- Maintain a work/break schedule. Breaks should be taken in a warm area, with protection from drafts.
- When very cold, consider cancelling outdoor activities.

VIBRATION

Vibration transferred from hand-operated tools and equipment (for example, a chain saw) can lead to white finger disease. J.J. MCGUIRE GENERAL CONTRACTORS INC. shall take every reasonable precaution to make sure the workplace is safe for the worker and will inform workers about the hazards associated with exposure to vibration and inform workers on how to protect themselves.

General recommendations include to:

- Use a minimum strength hand grip that still allows the safe operation of the tool or process.
- Wear sufficient clothing, including gloves, to keep 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.
- Consult a doctor at the first sign of vibration disease and ask about the possibility of changing to a job with less exposure.

The following precautions help to reduce whole-body vibration exposure:

- Limit the time spent by workers on a vibrating surface.
- Mechanically isolate the vibrating source or surface to reduce exposure.
- Ensure that equipment is well maintained to avoid excessive vibration.
- Install vibration damping seats

16.6 ASBESTOS

The human health effects from long-term unsafe asbestos exposure are well documented. Asbestos fibres are easily inhaled and carried into the lower regions of the lung where they can cause fibrotic lung disease (asbestosis) and changes in the lining of the chest cavity (pleura). These diseases can lead to reduced respiratory function and death. Long-term inhalation of asbestos fibres also increases the risk of lung cancer and mesothelioma.

Enlargement of the heart can also occur as an indirect effect from the increased resistance of blood flow through the lungs.

People are more likely to experience asbestos-related disorders if they:

- are exposed to high concentrations of asbestos,
- are exposed for longer periods of time, and/or
- are exposed to asbestos more frequently.

J.J. McGUIRE GENERAL CONTRACTORS INC. shall take all necessary measures and procedures by means of training, engineering controls, work practices and hygiene practices to protect worker from exposure to asbestos. In addition to the above, where the strict duty cannot be complied with because, an emergency exists, or the measures and procedures necessary to control the exposure of a worker to airborne asbestos do not exist or are unavailable, are not reasonable or practical for the length of time or frequency of exposure or the nature of the process, operation or work, or are not effective because of a temporary breakdown of equipment, the worker shall be provided with respiratory equipment which shall be used by the worker.

An assessment is to be made in writing of the exposure or likelihood of exposure of a worker to the inhalation or ingestion of asbestos. Where the assessment discloses that a worker is likely to inhale or ingest asbestos and that the health of the worker may be affected, the supervisor shall develop, establish, put into effect and maintain measures and procedures to control the exposure of the worker to asbestos.

As part of the project and job planning, any asbestos containing material shall be identified to all workers on the site. It is not J.J. McGUIRE GENERAL CONTRACTORS INC. intention to complete any handling of asbestos containing material at any time as this process is left to qualified contractors and should be identified to building and facility owners. This procedure is meant to identify the minimums to be considered as part of regular work activities.

16.7 LEAD

Lead exposure can cause permanent damage to the nervous system. Symptoms may include restlessness, reduced ability to think, muscle tremors, memory loss and personality changes. In severe cases, symptoms may include muscle weakness, loss of feeling or prickly sensation in the hands, feet, arms or legs, clumsiness and paralysis. Can cause permanent damage to the kidneys. Kidney function tests may show abnormal results. In severe cases, symptoms may include fatigue, increased or decreased urination, nausea, and vomiting. May harm the blood. Can cause a decrease in the number or size of red blood cells (anemia). Blood tests may show abnormal results. In severe cases, symptoms may include paleness, fatigue, weakness, dizziness, confusion, shortness of breath and headache. Has been associated with: increased blood pressure.

Two routes of entry are of major concern: inhalation and ingestion.

- **Inhalation:** Airborne lead particles in the form of fumes, dusts, and mists can be inhaled deeply into the lungs if they are small enough such as less than five micrometres (mm) (i.e., five one-millionths of a metre). Larger particles are trapped in the upper respiratory tract, cleared from the lungs, and subsequently swallowed.
- **Ingestion:** Can occur if it gets in your food or drinks, or if you eat or smoke without washing your hands first.

A significant portion of lead that is inhaled or ingested gets into the bloodstream. Once in the bloodstream, lead circulates through the body and is stored in various organs and body tissues. Some of this lead is filtered out of the body and excreted, but some remains in the blood and

tissues. As exposure continues, the amount stored will increase if the body absorbs more lead than it excretes. The lead stored in the tissue can slowly cause irreversible damage, first to individual cells, then to organs and whole body systems.

To avoid the ingestion, inhalation, and unintentional transfer of lead from contaminated areas, it is essential to have the following control methods in place:

- elimination and substitution,
- engineering controls,
- work and hygiene practices, and
- protective clothing and equipment.

Even with appropriate measures to control lead, some workers may still be affected. For this reason, periodic medical examinations are important to determine if the control measures are effective and if workers are suffering from the effects of lead exposure.

Elimination and Substitution

- Remove lead based products where possible by using safe work practices when removing or disturbing lead (see engineering controls for examples).
- Substitute lead-containing paints, coatings and materials with lead-free products.

Engineering Controls

Engineering controls include:

- Select methods and equipment for the removal or installation of lead-containing products that will reduce dust generation (e.g., wet methods, such as wet sweeping and shovelling). Local mechanical ventilation should be provided to remove contaminants at the source. This method is the most effective. For example, power tools that can generate lead-containing dust should be equipped with effective dust collection systems.
- General mechanical ventilation should be provided to remove contaminated air from the workplace, and filtered air should be provided to replace the exhausted air.

Work and Hygiene Practices

Lead-containing material can accumulate on hands, clothing and hair. From there it can be disturbed, re-suspended in air, and then inhaled or ingested. Workers should therefore be able to wash and shower at the end of each shift. For all work involving lead exposure, there should be no smoking, eating, drinking or chewing in contaminated areas. Food and beverages should be stored in an uncontaminated area.

An effective housekeeping program requires the regular clean-up and removal of lead-containing dust and debris. Surfaces should be kept clean by washing with water or vacuuming with a vacuum equipped with a high efficiency particulate air (HEPA) filter. Containers of lead-containing waste should be kept tightly covered to prevent dust from becoming airborne. Cleaning with compressed air or dry sweeping should be avoided.

Protective Clothing and Equipment

Appropriate personal protective clothing and equipment to prevent skin contamination, include but are not limited to:

- coveralls or full-body work clothing,
- gloves,
- hats,
- footwear or disposable coverlets, and
- safety glasses, face shields or goggles.

Where respirators are provided, they should be appropriate in the circumstances for the anticipated concentrations of airborne lead. Respirators should be selected according to the NIOSH assigned protection factors. Please also see the chemical profile on lead for the current NIOSH respirator recommendation.

J.J. McGUIRE GENERAL CONTRACTORS INC. shall take all necessary measures and procedures by means of engineering controls, work practices and hygiene practices to protect worker from exposure to lead. An assessment is to be made in writing of the exposure or likelihood of exposure in a workplace of a worker to the inhalation, ingestion or absorption of lead. Where respiratory equipment is used by an employee, the respiratory equipment shall be appropriate in the circumstances for the type and the concentration of airborne lead. Training and instruction to a worker in the proper care and use of respiratory equipment shall be provided.

An assessment is to be made in writing of the exposure or likelihood of exposure in a workplace of a worker to the inhalation, ingestion or absorption of lead. Where the assessment discloses that a worker is likely to inhale or ingest lead and that the health of the worker may be affected, the supervisor shall develop, establish, put into effect and maintain measures and procedures to control the exposure of the worker to lead.

As part of the project and job planning, any lead containing material shall be identified to all workers on the site. It is not J.J. McGUIRE GENERAL CONTRACTORS INC. intention to complete any handling of asbestos containing material at any time as this process is left to qualified contractors and should be identified to building and facility owners. This procedure is meant to identify the minimums to be considered as part of regular work activities.

16.8 SILICA

Silicosis is an incurable lung disease caused by inhaling dust that contains free crystalline silica. Silicosis is the result of the body's response to the presence of the silica dust in the lung. Silica dust particles are small in size and can reach deep into the lungs (to the alveoli). The dust particles which land on these surfaces are removed by white blood cells known as macrophages. However, particles of free crystalline silica cause the macrophages to break open, which form scar-like patches on the surface of the alveolus. When a large number of these "scars" form, the alveolar surface becomes less elastic. This effect reduces the transfer of gases, which can lead to shortness of breath.

J.J. McGUIRE GENERAL CONTRACTORS INC. shall take all necessary measures and procedures by means of engineering controls, work practices and hygiene practices to protect worker from exposure to silica. An assessment is to be made in writing of the exposure or likelihood of exposure in a workplace of a worker to the inhalation, ingestion or absorption of silica. Where respiratory equipment is used by an employee, the respiratory equipment shall be appropriate in the circumstances for the type and the concentration of airborne silica. Training and instruction to a worker in the proper care and use of respiratory equipment shall be provided.

An assessment is to be made in writing of the exposure or likelihood of exposure in a workplace of a worker to the inhalation, ingestion or absorption of silica. Where the assessment discloses that a worker is likely to inhale or ingest silica and that the health of the worker may be affected, the supervisor shall develop, establish, put into effect and maintain measures and procedures to control the exposure of the worker to silica.

16.9 CHEMICAL SPILL CLEANUP

J.J. McGUIRE GENERAL CONTRACTORS INC. shall take all measures reasonably necessary in the circumstances to protect workers from exposure to a chemical spill because of the storage, handling, processing or use of such agent in the workplace.

J.J. McGUIRE GENERAL CONTRACTORS INC. shall protect workers from exposure to a chemical spill without requiring the workers to wear and use personal protective equipment.

J.J. McGUIRE GENERAL CONTRACTORS INC. shall provide, and workers shall wear and use, personal protective equipment appropriate in the circumstances to protect the workers from exposure to a chemical spill.

Environmental & Waste Management Policy – Hazardous Spill Contingency Plan shall be reviewed and implemented in the event of a spill including spill categorization and emergency spills action plan.

17.0 PRE-JOB HAZARD RISK ASSESSMENTS, PRE-TASK PLAN (PTP) AND JOB SAFETY HAZARD ANALYSIS (JSA)

Pre-Task and Plans (PTP) along with Job Safety Hazard Analysis (JSA) are vital components of the Health & Safety Manual and organizing health, safety, and production activities. This analysis is undertaken to determine potential hazards and the control strategies as our corporate Safe Work Procedures (SWP), which must be employed to perform our daily work activities safely.

Each PTP will be completed based upon the findings of the project Pre-Job Hazard Risk Assessment. This will be reviewed on site to “break down” the job into individual components (tasks) and identify all requirements necessary to perform these tasks. This process will be completed when not required to complete the Constructors required similar daily analysis activity. Daily Job Safety Hazard Analysis will be completed and reviewed with the workforce to identify the daily hazard and implement proper controls prior to the commencement of work activities.

17.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Arrange for specific Pre-Job Hazard Risk Assessment to be produced, scheduled and distributed as required defining our SWP's.
 - Assist in developing the site specific packages and Pre-Task Plans.
-

- Ensure copies of completed Pre-Task Plans and Job Safety Hazard Analysis' are maintained on-site by the Superintendent.
- Assist in developing hazard awareness and training for all workplace and site personnel.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.
- Comply with all the requirements as defined under the Occupational Health and Safety (OHS) Act and Regulations.

Senior Management Responsibilities:

- Approve processes and distribution of Pre-Task Plan and Job Safety Hazard Analysis Forms.
- Take all measures reasonably necessary in the circumstances to protect employees from exposure to any related hazards at all locations.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.

Project Manager Responsibilities:

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Complete the Pre-Task Plan and Job Safety Hazard Analysis using the information from the sequence outlined under the provided Project Safety Plan and Job Hazard Analysis package defining our SWP's.
- Complete the Daily Supervisors Hazard Analysis Form to break down and describe the work tasks, jobs and hazards for all expected activities that day including the appropriate PPE and controls that are required for the specific work and location.
- Ensure a specific Pre-Task and Hazard Control Plan Form along with Supervisors Hazard Analysis is completed as defined by the completion schedule.
- Ensure a specific Pre-Task and Hazard Control Plan Form for all workplaces activities and sites are maintained and their records are in place.
- Review findings with each Foreman to ensure that corrective measures are taken.
- Follow-up on the findings and implement recommendations for each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with verbal and written instructions as to the measures and procedures to be taken for protection of the worker.

Workers Responsibilities:

- Where provided, follow all requirements as defined within the Pre-Task and Hazard Control Plan as directed by your Superintendent.
- Report any damage or missing guards, PPE or equipment immediately to your Superintendent.
- Workers are encouraged to provide constructive feed back to the Pre-Task and Hazard Control Plan based on their work experience and knowledge of site level activities.
- Works in the manner and with the protective devices, measures and procedures required by the OHS Act and Regulations.
- Report to his or her Foreman any contravention of the OHS Act and Regulations or the absence/defect in any equipment or protective device.

17.2 PRE-JOB RISK ASSESSMENTS, PRE-TASK PLAN (PTP) AND SUPERVISOR JOB SAFETY HAZARD ANALYSIS (JSA) PROCEDURE

A preliminary Pre-Job Hazard Risk Assessment will be conducted upon the initial planning stages of a project to determine potential site hazards and expected control measures. This assessment along with review of the project schedule will determine the necessary Pre-Task Plans required.

It is essential that a detailed and work specific Pre-Task Plan along with our Supervisors Job Safety Hazard Analysis is conducted and communicated to all site workplace personnel prior to starting each work day as part of the Pre-Task Plan Form. We require genuine effort into the completion of the process.

The Health and Safety Coordinator or a competent designate shall develop all site required Pre-Task Plans defining our corporate Safe Job Procedures (SJP) that cover the expected scope of work and scheduled activities for the project.

The Superintendent shall review each Pre-Task Plan with the Health and Safety Coordinator and sign off on completeness. The Superintendent will review the completed site specific Pre-Task Plan with all required site workplace personnel prior to the commencement of the work activity and capture sign-off verification.

All Superintendents who will be conducting and overseeing the descriptions and scheduled activities will conduct daily Supervisors Job Safety Hazard Analysis (JSA) identifying all necessary control strategies to perform tasks safely and on time.

The completed Pre-Task Plan with Supervisors Job Safety Hazard Analysis will be filed on site, maintained at the head Office upon completion of the project.

The Supervisors Job Safety Hazard Analysis as part of the Pre-Task Plan Form will identify hazards associated with the work tasks by assessing the risks within the job by:

- Communicating the required SWP with documentation
 - Ensuring controls are in place prior to commencing work so that risks are kept to an acceptable level.
 - Pre-job planning to increase the reliability of work.
 - Identifying activities required for the job at the start of the day.
 - Document site level due diligence as well as potential areas of improvements.
 - Documenting the site specific workplace violence assessment.
-

- Defining and labeling hazards within the job as follows:
- Providing daily awareness of all identified work activities for all workplace parties.
- Provide a comment and feedback section for workers to participate in the ongoing hazard assessment process.

When the Supervisors Job Safety Hazard Analysis is completed detailing the required daily activities, the Superintendent will review the completed JSA with all required site workplace personnel prior to the commencement of the work activity and capture sign-off verification.

Supervisors Job Safety Hazard Analysis will be completed for each job/common hazards in work environment as follows:

- The Site Foreman, Site Superintendent, Health and Safety Coordinator, with input from affected Worker(s).
- Subtrades are required to submit Pre-Task Plans prior to work start-up and subsequently reviewed and approved by J.J. MCGUIRE's safety department
- Supervisor Job Safety Hazard Analysis and Daily Worker Sign In forms will be used as pre Job Hazard Assessment.
- See attached J.J. M Tab Z and Tab EE.

A Hazard Class will be assigned to each of the identified hazards and control methods will be documented on the Pre-Job Hazard Risk Assessment, Pre-Task Plan, when required on the Supervisor Job Safety Hazard Analysis.

Severity	Frequency		
	Minor	Moderate	Major
Minor	C	B	B
Moderate	C	B	A
High	B	A	A

The hazard classes are as follows and require the following:

Class "A" - Likelihood of death, loss of body part; permanent loss of major structure or Item. Work does not commence/continue until a written mitigation plan has been implemented into the PTP and approved by the Manager/Supervisor directing the work.

Class "B" - Likelihood of serious interruptive injury, serious reparable damage. Work commences/continues with a written mitigation plan and program has been implemented in the PTP to reduce the hazard.

Class "C" - likelihood of minor loss. Work can commence/continue with appropriate mitigation and continue improvement plan implemented in the PTP.

18.0 PERSONAL PROTECTIVE EQUIPMENT (PPE) PROGRAM

The following Personal Protective Equipment (PPE) procedure will be used to identify the specific requirements for the use of PPE regarding selection, control and replacement.

To protect employees from potential workplace hazards, control of exposure to the hazards will be performed through use of the three general control strategies in the following order: Control at the Source, Control Along the Path and Control at the Worker.

18.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Arrange with the Project Manager for all company supplied and site specific PPE to be purchased and distributed.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing PPE Plan for all workplaces and sites.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.
- Ensure PTP's include the written rules and/or guidelines for proper fitting, care and use of specialized PPE.

Senior Management Responsibilities:

- Take all measures reasonably necessary in the circumstances to protect employees from exposure all related hazards at all locations.
- Review Occupational Health and Safety Act and Regulations to ensure compliance within the PPE requirements.
- Ensure the appropriate PPE is implemented across all areas of responsibility.
- Ensure that the equipment, materials and protective devices as prescribed are provided, maintained in good condition and used as prescribed.

Project Manager Responsibilities:

- Arrange with the Health and Safety Coordinator for all company supplied and site specific PPE to be purchased and distributed.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Ensure a site specific PPE for all workplaces and sites is used, maintained and in place.
 - Follow-up on the findings and implement recommendations for each unsafe condition.
 - Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
 - Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
-

- Ensure workers are made aware of the requirements for PPE for all activities.

Foreman Responsibilities:

- Ensure known site related hazards are defined with a site specific plan or Hazard Assessment and appropriate PPE is defined and provided as required.
- Take prompt and appropriate action when contraventions with the use or maintenance or PPE have been identified.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker
- Ensure workers are made aware of the requirements for PPE for all activities.

Workers Responsibilities:

- Use and maintain all required PPE as defined under the PSP.
- Report any damage or missing PPE immediately to your Foreman.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

18.2 PERSONAL PROTECTIVE EQUIPMENT PROCEDURE

The **Health and Safety Coordinator** with the assistance of the **Superintendent** will develop a Personal Protective Equipment Program. Once the program has been completed, the **Health and Safety Coordinator** will arrange to meet with the department **Superintendent** to review the agreed upon requirements for the PPE Program.

All required workers will receive specific training regarding their selection, use/ care and limitations of their PPE during orientation with applicable demonstrations where required. (PTP required update)

The primary focus of our Health and Safety Program is to eliminate or control potential hazards to which our employees could be exposed. It has been acknowledged that the use of Personal Protective Equipment (PPE) is the least desired method of controlling workplace hazards, therefore, the use of Personal Protective Equipment will only be considered after other control methods have been explored.

Potential harmful hazards exist at our locations and we will implement control measures to eliminate and/or control the harmful effects of these hazards. Engineering and Administrative Controls will be used for the most part; however, there are some circumstances and job functions which require the use of PPE to control the exposure to the hazard.

The following program will identify the need for PPE and the implementation of a program designed to protect our workers. This program will encompass the following areas:

- selection/ use
 - maintenance
 - monitoring
-

- employee training

18.3 SELECTION AND USE OF PERSONAL PROTECTIVE EQUIPMENT (PPE)

In order to determine the required PPE for the workplace, health and safety audits must be performed by the Health and Safety Coordinator and the Superintendents. Once hazardous conditions warranting the use of PPE have been identified, the appropriate selection of such equipment may begin.

In our Orientation program as part of our Employment Guidelines, all our requirements for the use of PPE have been identified and will be communicated.

The selection of PPE should be based on the following criteria:

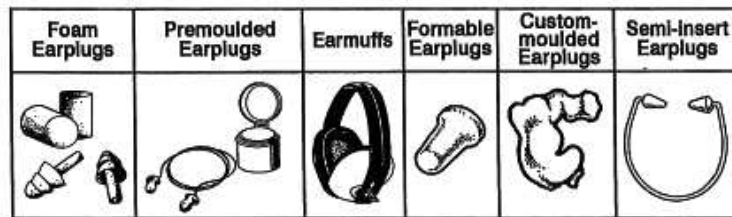
- 1.) Protection of workers
- 2.) Compliance with legislative requirements
- 3.) Hazard Assessments
- 4.) MSDS's

The following are the minimum requirements for PPE which will be used. This listing is not all-inclusive and when required, it may be necessary for workers to use alternative PPE. All PPE must be CSA Approved or equivalent and maintained in proper working order.

Hearing Protection

- hearing protection will be required in designated areas of the facility where noises levels exceed 85 decibels (dBs). Hearing protection will be either plugs or muffs. The type of hearing protection to be used may vary according to the noise levels, therefore, specific types of hearing protection will be provided for employees exposed to excessive noises (job/department specific)

We recommend a proper hearing protection device for any loud noise (see chart below):



Options for Hearing Protection

Recommended Hearing Protection

Level of Noise Exposure L_{Ex} (dBA)	Grade	Class
< 90	1	C
< 95	2	B
< 100	3	A
< 105	4	A
< 110	Dual*	
> 110	Dual†	

* Dual hearing protection required. Use a minimum of a Grade 2 or Class B earmuff and a Grade 3 or Class A earplug.

† Dual hearing protection required. It is also recommended that exposure durations be limited, octave-band analysis be conducted for attenuation predictions, and twice-annual audiometry be provided to the affected individuals.

Note: These recommendations are based on a daily 8-hour exposure. Adapted from CSA Standard Z94.2-02

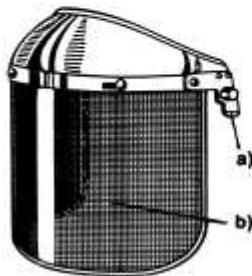
Face Protection

- Full-face protection must be worn to protect workers against the hazards of flying projectiles or hot liquids. A face shield will be worn in addition to safety and prescription glasses and cover goggles when worker is exposed to potential flying projectiles. Workers must wear face shields when dispensing hot liquids or exposed to projectiles.
- Workers must be wearing a face shield when dispensing hot liquids or exposed to projectiles.



Class 6A
Face shield for impact, piercing, splash, head, and glare protection.
a) hard hat attachment; b) face shield (window).

Class 6B
Face shield for light non-piercing impact, splash, low heat, and glare protection. The major difference between 6A and 6B is the degree of thickness in the shield.



Class 6C
Face shield for light non-piercing impact and high heat protection only (usually wire screen windows). a) hard hat attachment; b) wire screen.

Eye Protection

- workers will be required to wear CSA approved safety eyewear, with side shields, in designated areas including all industrial location. For workers who perform tasks which require additional eye protection (e.g. welding shields), equipment is available.
- face shields in addition to glasses must be worn which protect against splashes, sparks.
- wear goggles or face shield for additional protection against dust and flying particles.



Class 1A
Spectacles with side protection

Hand/ Arm Protection

- Gloves should fit snugly at the wrist or elastic cuffs should be worn to keep out hot liquid where exposed.

- Use the right gloves for the job as hands also need protection against chemicals. Check the label to see whether a product must be handled with gloves and what types of gloves are required.
- For your protection on the job, do not wear loose clothing, greasy or oily clothing, torn or ragged clothing and finger rings, bracelets or neck chains.
- Personal clothing shall be construction clothing suitable to afford full protection to the skin. Wearing of short pants and short sleeve shirts or removal of shirts is not permitted. Remember to cuff your pant and shirt lengths over your gloves and boots.

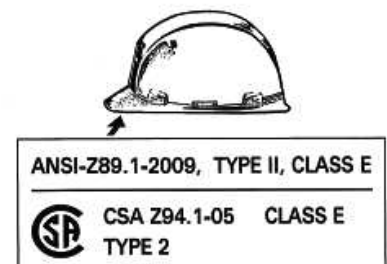
Foot Protection

- In all our Industrial and Construction workplace, all workers must wear CSA Certified Grade 1 Footwear (Green Patch/ heavy duty with sole protection) as a minimum which are appropriate foot protection for the location.
- Safety boots must be properly laced and tied at all times.
- Safety boots must have proper sole to protect against electric shock under dry conditions.



Head Protection

- Where exposed to the hazard of being struck by falling objects, an CSA Class E approved hard hat, in good condition, must be worn
- Hard hats are required at all times on construction projects.
- Workers must visually inspect the hard hat every day before using it.
- Never wear a baseball cap or other material under the hard hat.
- A hard hat should normally be worn facing forward. It may be worn backwards only if it has a reverse orientation mark.
- Workers must check the suspension for cracks or tears. Make sure straps are not twisted, cut, or frayed.
- If a worker finds any signs of damage or degradation, remove the hard hat from service immediately.



CSA label stamped into the shell
indicating Class E hard hat

Specialized Personal Protective Equipment

Fall Arrest Harness

- A CSA approved full body harnesses and shock absorbing lanyards must be worn at heights of 10 feet or over from the edge of any raised work surfaces or roof edges, unless properly scaffolded or guard rails provided.

- All components of the fall arrest system involved in arresting the worker in the fall shall be gathered and taken out of service. Lanyard and full body harness shall be disposed of after the completion of all investigation(s).
- Workers will receive specific training in Working at Heights for all applicable workers.

Respirators

- Appropriate NIOSH or equivalent approved respiratory protection will be provided to all required workers as defined on the MSDS sheet.
- Appropriate training and fit test will be provided for all required workers.

Note: Additional or specialized Personal Protective Equipment will be made available as is necessary for the task and/ or when recommended on a product's Material Safety Data Sheet. (e.g. fall protection, neoprene gloves, etc.). Where required, all workplace parties shall wear a retro-reflective vest or retro-reflective garments in addition to his/her other personal protective equipment when exposed to vehicular traffic hazards.

18.4 MAINTENANCE & INSPECTION OF PPE

All employees will be trained on the limitations and proper care and maintenance and inspection of their Personal Protective Equipment by the Health and Safety Coordinator. This instruction will be done according to the manufacturer's specifications. Maintenance and inspection will meet all manufacturer and legislative requirements.

All defective, damaged or non-repairable items will be taken out of service and replace with suitable replacements as required. In addition, all clothing that has come into contact with solvents or other curative material must be removed from use as required.

Monitoring for use of the required PPE will be conducted by all Superintendent / Foreman and the Health and Safety Coordinator where applicable. Foreman will visually check all workers to ensure that everyone is adequately wearing/ using their PPE where required according to the manufacturer's specifications and the job requirements.

Superintendent are responsible to ensure that the PPE and equipment required for the project at all times where required. Where required and they will be forced to use Progressive Disciplinary Action for those employees when they fail to wear the appropriate Personal Protective Equipment as required. The Foreman reserve the right to remove anyone who causes the unsafe condition or practice to exist, or who performs in a manner not consistent with the requirements of the Occupational Health and Safety Act and/or it's Regulations.

All workers will immediately report missing or broken PPE to their Foreman for replacement or repairs as required.

Training for the proper use, care and limitations of the PPE provided to employees will be arranged by the Health and Safety Coordinator. This training will cover the following topics:

- how to obtain required PPE
 - how to use the Protective Equipment
 - how to clean the equipment
 - how and where to store the equipment
 - the limitations of the equipment
-

All training sessions provided to workers will be documented and maintained on file. New employees will receive this training during their Orientation to the workplace and during specific task training.

19.0 TOOL BOX SAFETY TALKS

Tool Box Safety Talks will be used as a communication method to provide specific information on current health and safety related issues and as a means of providing basic health and safety awareness information to Workers and Subtrades.

19.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Receive completed copies of Tool Box Talks Form (TAB E) each Superintendent.
- Respond to and report any nonconformance or deficiencies observed to Senior Management.
- Respond to any nonconformance or deficiencies observed from the Superintendents.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Ensure all company employees receive the appropriate training and workplace specific overviews.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Project Managers Responsibilities:

- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Select appropriate Tool Box topics as part of our Safe Work practices package as identified as part of our weekly workplace inspection findings or as site conditions dictate.
 - Ensure Tool Box Safety Talk are delivered to all workers on their site as required.
 - Record the topics and attendance on the Tool Box Safety Talk form to demonstrate compliance.
 - Allow for follow up questions and clarification of topics as needed.
-

- Ensure that appropriate Toolbox Safety Talks are completed by each Foreman on a weekly basis.
- Ensure that copies (hard copy or electronic) of completed Toolbox Safety Talks are submitted to the Health and Safety Coordinator on a weekly basis.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure, where reasonably possible, that every workplace party complies with all Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.

Workers Responsibilities:

- Participate in Tool Box Safety Talk sessions and provide input to topics where required.
- Sign in on the Tool Box Safety Talk form to demonstrate participation and attendance.
- Advise Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

19.2 TOOL BOX SAFETY TALK PROCEDURE

The **Superintendent** will conduct weekly Tool Box Safety Talks with our workers using the Tool Box Safety Talk Forms (TAB E). The Topics will be chosen by the **Superintendent** based on observations from the completed weekly workplace inspections unless a topic specific to a project is provided by the **Project Manager** or the **Health and Safety Coordinator**.

Tool Box Safety Talk Forms (TAB E) must be completed by the Subtrade Supervisors when requested by the Superintendent with all Subtrade workers all in attendance signing in on the Tool Box Safety Talk Forms.

The completed Tool Box Safety Talk Forms must be kept in the site safety file and provided to the **Health and Safety Coordinator** at the end of the project or as requested through the duration of the project.

Tool Box Talks conducted by the **Superintendent** will be maintained review. The **Superintendent** will ensure all completed Toolbox Safety Talks will be filed on site, maintained at the head Office upon completion of the project.

Tool Box Safety Talks will be retained on file (site specific) for a period of Five years after project completion.

20.0 HEALTH AND SAFETY MANAGEMENT MEETINGS

Our health and safety programs, systems and statistics must be reviewed on a regular basis and at least annually, to ensure that it is in compliance with current regulations and that it meets the needs of the company.

Where changes and summaries must be made, it is necessary to have an approval system in place to ensure that company objectives and activities are reviewed by approved personnel and distributed appropriately.

20.1 PROCEDURE RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Schedule and hold quarterly management Health and Safety review meetings to identify activities relating to Programs, Revision, Procedures, Statistics, Policies, and Follow up activities.
- Record and distribute meeting minutes and updates to the appropriate parties as required.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety orientation documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.
- Create Quarterly Health & Safety Management Report and distribute to all personnel on a quarterly basis.
- Schedule and hold an annual health and safety meeting for all personnel.

Senior Management Responsibilities:

- Direct and participate in the quarterly management Health and Safety review meetings to identify activities relating to Programs, Revision, Procedures, Statistics, Policies, and Follow up activities.
- Annually sign and authorize the updates as required.
- Ensure all company employees receive the appropriate training and workplace specific overviews.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the equipment, materials and protective devices are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Participate in Management Meetings on a quarterly basis.
 - Ensure equipment, materials and protective devices provided are provided, maintained and used as required at site and office locations.
 - Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
-

Superintendent Responsibilities:

- Participate in Management Meetings on a quarterly basis.
- Participate and provide input when requested to all distributed documentation from the annual manual review.
- Allow for documented statistics, records and follow up actions as needed.
- Ensure that appropriate site documentation is completed by each as required.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.

Foreman Responsibilities:

- Participate in annual health and safety meetings.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations;
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which the is aware of;
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker.

Workers Responsibilities:

- Participate in annual health and safety meetings.
- Advise Supervisor if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Supervisor any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

20.2 HEALTH AND SAFETY MANAGEMENT MEETING PROCEDURE

The Health and Safety Coordinator will schedule Quarterly management meetings to review and identify actives relating to Programs, Revision, Procedures, Statistics, Policies, and Follow up activities.

Specific agenda items and topics will be standardized where the Health and Safety Coordinator will prepare summaries and meeting content prior to each set meeting.

Requests for revisions to any policies, procedures or forms can be made at this time to the Health and Safety Coordinator. Revisions to the Health and Safety Manual shall be made by the Health and Safety Coordinator in consultation with Senior Management. Follow up on each activity will be reviewed during the following meeting.

The Health and Safety Coordinator will use the Management Meeting Minutes to document the meeting topics and ideas tabled and/or suggestions of revisions to communicate required updates to the workforce. Meeting Minutes and topics include the following:

- define health and safety goals and activities
- provide target dates
- assigned appropriate responsibility
- allocation of people, time and financial resources
- senior management approval
- schedule of progress reviews and distribution of progress reports
- summary of incident and investigation findings and follow-up
- celebration and recognition of successes as goals are achieved

All findings or revisions will be distributed to any member of the company who has a copy of the Health and Safety Manual, including;

- Senior Management
- Superintendent
- Health and Safety Coordinator

20.3 STATISTICS AND RECORDS

Quarterly, the Health and Safety Manager will create an annual report summarizing and identifying trends from the information reviewed and approved within each management meetings from the previous quarter. This quarterly report will summarize relevant injury, incident and site related trends with the goal to communicate positive findings and identify areas where improvements can be made.

Specific Statistic analyzed and monitored shall include:

- Manhours
 - Lost-Time Incidents
 - Medical Aid Incidents
 - Modified Duties Incidents
 - First Aid Incidents
 - Total Recordable Incident Rate (TRIR)
 - Incident Types
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21.0 FIT FOR DUTY POLICY

Expectations for Workers & Contractors Procedure

21.1 PURPOSE

J.J. McGuire has an overriding obligation to protect the health and safety of all individuals by ensuring that all Workers performing Work are Fit for Duty, as defined in this Fitness for Duty Expectations for Workers & Contractors Procedure (“Expectations”). In light of this obligation and recognizing the safety-sensitive nature of J.J. McGuire operations, the expectations are intended to outline in more detail the standards associated with being Fit for Duty while performing Work.

21.2 APPLICATION

Contractors are encouraged to implement their own Fitness for Duty policy. At a minimum, a Contractor is expected to ensure, that all Workers they employ, contract with, or assign to perform Work, and to ensure that Subcontractors and their workers, understand and meet the requirements set out herein.

21.3 RESPONSIBILITIES

i. Contractor Responsibilities

Contractors are expected to:

- adhere to the requirements of the Expectations and ensure, by enforcing these requirements, that their Workers and Subcontractors do the same.

ii. Worker Responsibilities

Workers performing Work are expected to adhere to the requirements of the Expectations including, but not limited to:

- reporting Fit for Duty and remaining fit while On Duty or otherwise on Site;
- co-operating with any investigation required by the Expectations; and
- taking appropriate action(s) to minimize any safety risk.

If unexpected circumstances arise where a Worker is requested to perform Work while he or she is not Fit for Duty, it is the responsibility of the Worker to inform the Contractor or Subcontractor, as applicable, the Worker’s supervisor and/or a J.J. McGuire representative that he or she cannot perform the Work.

iii. Subcontractor Responsibilities

Subcontractors are expected to adhere to the requirements of the Expectations, as applicable, and to ensure, by enforcing these requirements, that their Workers and any Subcontractors they contract with do the same.

Subcontractors that are individuals are also expected to adhere to the requirements of the Worker Responsibilities, set out above.

21.4 STANDARDS

i. Illicit Drugs

The following are prohibited while On Duty or otherwise on J.J. McGuire premises or worksites:

- reporting for duty or remaining On Duty under the influence of illicit drugs;
- consuming any illicit drugs during meals or other breaks; and
- the use, possession, distribution, offering or sale of illicit drugs or Drug Paraphernalia.

ii. Alcohol

The following are prohibited while On Duty or otherwise on J.J. McGuire premises or worksites:

- the use, possession, distribution, offering, or sale of alcohol;
- reporting for duty or remaining On Duty under the influence of alcohol from any source; and
- consuming any product containing alcohol.

iii. Cannabis

The following are prohibited while On Duty or otherwise on J.J. McGuire premises or worksites:

- the use, possession, distribution, offering, or sale of cannabis and cannabis-based products;
 - reporting for duty or remaining On Duty under the influence of cannabis from any source; and consuming any product containing cannabis.
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iv. Medications

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

The following are prohibited while On Duty or on J.J. McGuire premises or worksites:

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

iv. Extreme Fatigue

Workers are expected to report Fit for Duty and are responsible for taking appropriate action(s) to avoid Extreme Fatigue while On Duty. When performing Work, Workers are prohibited from reporting for duty or remaining On Duty when suffering from Extreme Fatigue. All Workers are responsible for:

- ensuring sufficient rest periods prior to starting work and utilizing breaks provided within and between shifts to rest and recuperate; and
- recognizing the symptoms of fatigue and reporting incidents of Extreme Fatigue to the Contractor or Subcontractor, as applicable, his or her supervisor and/or a J.J. McGuire representative.

21.5 INVESTIGATIONS AND REPORTING REQUIREMENTS

i. Fit for Duty

a. Investigations by Contractors:

If there are reasonable grounds to believe that a Worker is not Fit for Duty, or has otherwise violated the Expectations, the Contractor is required to notify a J.J. McGuire representative immediately, to remove the Worker from performing Work and to provide the Worker with an opportunity to explain the situation.

If the Contractor is unavailable or otherwise unable to have the Worker removed, J.J. McGuire will remove the Worker.

The Worker shall not perform any further Work, perform additional Work or enter upon any Site pending the results of the investigation without the permission of the Contractor.

All investigations by the Contractor must be performed to J.J. McGuire's satisfaction. A Contractor must prepare a written report directed to the applicable J.J. McGuire representative setting out the nature of its investigation and the results.

ii. Alcohol and Drug Testing

When an investigation is conducted into whether a Worker is Fit for Duty, or has otherwise violated the Expectations, an alcohol and Drug testing policy assists in complying with the obligations under applicable legislation, including the Occupational Health and Safety Act and the Human Rights Code.

J.J. McGuire reserves the right to alcohol and Drug test in consultation with J.J. McGuire unionized worker representatives under three conditions:

- Reasonable cause – reasonable grounds to believe the Worker is impaired while On Duty.
- Post-incident – where there is a significant accident or near miss and there is no explanation except the Worker's act or omission.
- Return to work – conditions imposed following treatment for substance abuse in consultation with local unions.

iii. Impaired Driving Situations

If required to operate any vehicle, Workers must report the loss of a valid driver's license to the Contractor, their supervisor and/or a J.J. McGuire representative immediately. In addition, Workers are required to immediately report to the Contractor, their supervisor and/or a J.J. McGuire representative the receipt of any impaired driving charges and/or suspensions received while operating a vehicle On Duty.

iv. Possession of Alcohol or Drugs

Contractors are required to notify a J.J. McGuire representative if they have reasonable grounds to believe that a Worker possesses alcohol and/or illicit drugs while performing Work or otherwise on J.J. McGuire premises or worksites while On Duty. In cases where the

Contractor or J.J. McGuire has reasonable grounds to believe this, the police must be contacted. If police do not conduct an investigation, J.J. McGuire or the Contractor will conduct the investigation. A Worker may not perform any Work or additional Work pending the results of an investigation.

If a Contractor conducts the investigation, a report must be prepared setting out the nature of its investigation and the results. All investigations conducted by Contractors must be performed to J.J. McGuire's satisfaction.

v. Worker Refusal to Participate in Investigation

Where a Worker refuses to participate in an investigation required by the Expectations, he or she will be directed to cease performing any Work and additional Work.

21.6 VIOLATIONS AND CONSEQUENCES

i. Violations

In the case of a confirmed violation of the Expectations, the Contractor and/or Worker shall not perform any further or additional Work and/or enter upon any J.J. McGuire premises or worksites without J.J. McGuire's written permission. If requested by J.J. McGuire the Contractor and/or Worker must provide a written safety program detailing how the Contractor/Worker will ensure adherence to these Expectations when performing further and/or additional Work to obtain this written permission.

The decision to permit a Contractor and/or Worker to perform further and/or additional Work and to enter upon J.J. McGuire premises or worksites, is at the sole discretion of J.J. McGuire.

If the Contractor and/or Worker does receive J.J. McGuire's written permission to perform further and/or additional Work, the Contractor and/or Worker must adhere to the written safety program, if applicable, and any imposed written conditions that the Commission in its sole discretion may determine are appropriate to ensure that future violations of the Expectations do not occur.

ii. Consequences

Contractors that are in violation of the Expectations may be in breach of their contract with J.J. McGuire. This breach of contract may result in the Contractor being required to pay liquidated damages pursuant to the terms of the contract to the Commission, and/or suspension and/or termination of the contract.

At the sole discretion of J.J. McGuire, it may choose to not consider the Contractor who has violated these Expectations for additional Work for a period of one year from the date of the termination letter. In such an instance, during the one-year period, the Contractor and/or Worker will be removed from the J.J. McGuire bidders list and any bid submissions from the Contractor will not be considered. The Contractor and/or the Worker will also be prohibited from entering any Site.

Workers that are in violation of the Expectations will be refused from working and are liable to be severely disciplined or terminated from employment in consultation with J.J. McGuire unionized worker representatives.

21.7 DEFINITIONS:

“Worker” means:

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

“Drug” means any substance, including but not limited to alcohol, illicit drugs, medications, or other substances the use of which has the potential to change or adversely affect the way a person thinks, feels or acts. For purposes of this procedure, Drugs of concern are those that inhibit a Worker’s ability to perform Work safely and productively.

“alcohol” refers to beer, wine and distilled spirits, and includes the intoxicating agent found in medicines or other products.

“illicit drug” means any Drug or substance which is not legally obtainable and whose use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g. street Drugs such as marijuana and cocaine).

“medication” refers to a Drug obtained legally, either over-the-counter or through a doctor’s or Nurse Practitioner’s prescription.

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

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

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

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



